



RECORDS MANAGEMENT POLICY

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PURPOSE

The purpose of the Records Management Policy is to ensure that full and accurate records of all activities and decisions of the Lutheran Women's Missionary League (LWML) are created, managed, and retained or discarded at the proper time. This will enable the LWML to achieve information accessibility, business enhancement, office continuity, and improvement. It will also allow the LWML to meet its obligations for accountability while ensuring that it protects the interests of the organization, the committees, the board, the staff, and the members. Effective management of information is essential to sustain the efficiency and effectiveness of the LWML.

POLICY STATEMENT

The LWML's information and records are a corporate asset, vital both for ongoing operations and in providing valuable evidence of business decisions, activities, and transactions.

All LWML records must be managed and maintained regardless of their format in an authorized records management system.

All LWML board and committee members and staff must comply with this policy, and associated records management procedures, in their conduct of official business for the LWML by:

- Ensuring that full and accurate records are created and maintained for each business process followed in the LWML.
- Preserving records, whether hard copy or electronic, safely and securely.
- Ensuring that electronic records are saved and stored in the LWML's cloud-based record keeping system, with appropriate naming procedures used to enable their efficient retrieval and use.
- Ensuring records are accessible over time to support the conduct of business, and that they are only retained for as long as required according to the LWML's Records Retention Schedule.
- Assigning responsibilities for record keeping within the LWML.

The LWML aspires to proactively implement systems and processes which will enable records and information to be stored in an electronic format wherever possible.

All practices and procedures concerning records management within the LWML must be in accordance with this Policy.

SCOPE

This policy applies to the management, maintenance, and retention periods of records through their life cycle from creation, receipt or capture, to preservation and disposal. It includes records in any format held in the LWML's information systems. This policy covers board and committee members and staff who:

- Create information.
- Access information.
- Have responsibility for information including storage, retrieval, dissemination, and disposal.
- Have management responsibilities for officers engaged in any of these activities.

Records exist in a variety of formats including, but not limited to, paper documents, electronic messages, word processed letters, webpages, information in databases, photographs, film, charts, audio and video files, etc.

Regardless of format, records must be created, captured, maintained, secured, and disposed of in accordance with the requirements of this Policy.

GOALS

The goals of this Policy are:

- To ensure effective organizational records management, covering the creation and maintenance of authentic, reliable and useable records.
- To ensure the LWML's records support the accountability and transparency of its business functions and activities for as long as those records are required.
- To provide evidence of the LWML's commitment to best practice records management.
- To set out the responsibilities of committee and board members and staff, clarifying their accountability for records and information management.
- To ensure that records and information management is done in accordance within the LWML business requirements.
- To ensure that records of long-term value are identified and protected for historical and other research.
- To protect vital information in the event of a disaster.

DEFINITIONS

Record

A “record” is any information (paper or electronic) recorded in a tangible form that is created or received by the LWML and documents some aspect of its operations. A record has some enduring value to the LWML that merits its retention for some period of time. Records include original and copies of contracts and other legal documents, memos, reports, meeting minutes, bylaws, handbooks, manuals, forms, checks, accounting journals and ledgers, drawings, maps, images, and photographs. These records may be found in various electronic or machine-readable formats, including without limitation, CD-ROMs, DVDs, tape recordings, voice mail messages, emails, microfiche, webpages, computer, and other electronic files.

Other Information/Data

“Other information” or “data” is any other material that is of a transitory nature, that after serving its limited purpose or being transferred to a more permanent form or being incorporated with other record material, LWML has no need to retain such information except in the event of a legal hold.

Access to Records

Information is a corporate resource to which all board and committee members and staff may have access, except where the nature of the information requires restriction. Access restrictions should not be imposed unnecessarily but should protect:

- Individual staff, board, or committee member privacy.
- Sensitive material classified as “confidential.”

Retention or Destruction of Records

LWML records are destroyed when they reach the end of their required retention period as outlined in the Records Retention Schedule. Destruction may occur by the following acceptable methods:

- Recycling or trash if not sensitive, personally identifiable, or confidential information is included.
- Shredding, burning, or pulverizing if sensitive, personally identifiable, or confidential information is included.
- Deletion of records and data on shared network files, computer desktop, and laptop hard drives, including personal copies.
- Deletion of distributed data/records on peripheral devices and portable storage media (PDAs, memory sticks, CDs, etc.).

Some records can be destroyed in the normal course of business. These are records of a short-term, facilitative, or transitory value that are destroyed as short-term value records.

Suspension of Destruction/"Legal Hold"

A legal hold is the process for suspending the destruction of records and other information that becomes necessary for the LWML to preserve. A legal hold may need to be issued for various reasons, such as:

- A complaint is filed against the LWML.
- A credible threat of litigation has been received by the LWML.
- A discovery request is received by the LWML.
- A subpoena has been issued on the LWML.

- An event has occurred that resulted in death or serious bodily injury.
- A circumstance has arisen that is likely to cause the LWML to file a lawsuit against someone or some entity.
- An employee has made a complaint/allegation/report regarding a violation of law, LWML policy, or other improper conduct prompting an internal investigation.

Monitoring the Records Management Program

The records management program will be monitored for breaches of this Policy by the Department of Organizational Resources.

RECORDS RETENTION SCHEDULE

Business records must be created and preserved by everyone subject to this policy and should provide a reliable and accurate account of business decisions and actions. Therefore, it is necessary to include all information to support business needs including the names, dates and time, and other key information needed to preserve the business context.

Ultimately, if the record contains a business transaction or evidence of any decision that has been made on behalf of the LWML, it must be kept for the required time as per the Records Retention Schedule outlined below.

The Record Retention Schedule is organized as follows:

- A. Accounting and Finance
- B. Contracts
- C. Corporate Records
- D. Correspondence and Internal Memoranda
- E. Electronic Documents
- F. Grant Records
- G. Insurance Records
- H. Legal Files and Papers
- I. Miscellaneous
- J. Payroll Documents
- K. Pension Documents
- L. Personnel Records
- M. Property Records
- N. Tax Records
- O. Contribution Records
- P. Programs & Services Records
- Q. Fiscal Sponsor Project Records

A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Biennial Audit Reports and Financial Statements	Permanent
Biennial Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Biennial Plans and Budgets	4 years
Financial Institution Statements and Canceled Checks	7 years
Scanned Checks Processed Via Mobile Deposit	60 days

Employee Expense Reports	7 years
General Ledgers	Permanent
Interim Financial Statements	7 years
Notes Receivable Ledgers and Schedules	7 years
Investment Records	7 years after sale of investment
Credit Card Records (documents showing customer credit card number)	Shred after processing

1. Credit card record retention and destruction

A credit card may be used to pay for the following: convention registration fees, invoice payment, donations, pledges, LWML Store products, and *Lutheran Woman's Quarterly* subscriptions.

All records showing customer credit card number must be locked in a desk drawer or a file cabinet when not in immediate use by staff.

If it is determined that information on a document, which contains credit card information, is necessary for retention then the credit card number will be redacted or cut out of the document.

B. CONTRACTS

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

C. CORPORATE RECORDS

Record Type	Retention Period
Corporate Records (minute books, signed minutes of the Board and all committees, all meeting agendas, corporate seals, articles of incorporation, bylaws, annual corporate reports)	Permanent
Board and committee rosters	Permanent
Licenses and Permits	Permanent

D. CORRESPONDENCE AND INTERNAL MEMORANDA

General Principle: Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (seven years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:

1. Those pertaining to routine matters and having no significant, lasting consequences should be discarded *within two years*. Some examples include:
 - Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
 - Form letters that require no follow-up.
 - Letters of general inquiry and replies that complete a cycle of correspondence.
 - Letters or complaints requesting specific action that have no further value after changes are made or action taken (such as name or address change).
 - Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
 - Chronological correspondence files.

Please note that copies of interoffice correspondence and documents where a copy will be in the originating department file should be read and destroyed, unless that information provides reference to or direction to other documents and must be kept for project traceability.

2. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.

E. ELECTRONIC DOCUMENTS

1. **Electronic Mail:** Not all email needs to be retained, depending on the subject matter.
 - All email — from internal or external sources — is to be saved or deleted after 12 months.
 - Personnel will strive to keep all but an insignificant minority of their email related to business issues.
 - Email that is deleted by a user stays in the Deleted Items folder permanently unless the user also deletes the email from the Deleted Items folder. In that case, the email is deleted permanently after 14 days and non-recoverable at that time.
 - Personnel will not store or transfer LWML-related email on non-work-related computers except as necessary or appropriate for LWML purposes.
 - Personnel will take care not to send confidential/proprietary LWML information to outside sources.
 - All user mailboxes have a 50 GB limit. Personnel will be notified if their email account size reaches 50 GB.
 - Any email the office staff deems vital to the performance of their job should be copied to the personnel's H: drive folder, and printed and stored in the employee's workspace.

- All email storage is Cloud-based at Microsoft. A local copy of the email is cached in each users OST file which should be on the H: drive. Microsoft takes all necessary steps to make sure the system is secure and protected including redundancy.
- 2. Electronic Documents:** including Microsoft Office Suite and PDF files. Retention also depends on the subject matter.
- **PDF documents** – The length of time that a PDF file should be retained should be based upon the content of the file and the category under the various sections of this policy.
 - **Text/formatted files** – Personnel will conduct annual reviews of all text/formatted files (e.g., Microsoft Word documents) and will delete all those they consider unnecessary or outdated.
- 3. Webpage Files:** Internet Cookies
- All workstations: Web browsers should be scheduled to delete internet cookies once per month.

LWML does not automatically delete electronic files beyond the dates specified in this Policy. It is the responsibility of all personnel to adhere to the guidelines specified in this Policy.

A Backup and Disaster Recovery Appliance is installed and maintained on the LWML network and it performs onsite server backups every 60 minutes. The backups are stored both locally for quick file retrieval and on the Cloud for complete disaster recovery. This system is fully managed and monitored by LWML's information technology contractor. This applies to data stored on our network server not on individual computers (C: drive).

In certain cases, a document will be maintained in both paper and electronic form. In such cases, the official document will be the electronic document.

F. GRANT RECORDS

LWML as Grantee:

Record Type	Retention Period
Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
All requested IRS/grantee correspondence including determination letters and "no change" in exempt status letters	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period

All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Report assessment forms	7 years after completion of grant period
Documentation relating to grantee evidence of invoices and matching or challenge grants that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	7 years after completion of grant period
Grantee work product produced with grant funds	7 years after completion of grant period

LWML as Grantor:

Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period
All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Documentation that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and documentation	7 years after completion of grant period

G. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment
Certificates Issued to LWML	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans – Active Employees	Until Plan is amended or terminated

Group Insurance Plans – Retirees	Permanent or until 6 years after death of last eligible participant
Inspections	3 years
Insurance Policies (including expired policies)	Permanent
Journal Entry Support Data	7 years
Loss Runs	10 years
Releases and Settlements	25 years

H. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject files)	7 years after close of matter
Litigation Files	1 year after expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years

I. MISCELLANEOUS

Record Type	Retention Period
Consultant's Reports	2 years
Material of Historical Value (including pictures, media releases, news articles)	Permanent
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals – Copies	Retain current version only
Annual Reports	Permanent

J. PAYROLL DOCUMENTS

Record Type	Retention Period
Employee Deduction Authorizations	4 years after termination

Payroll Deductions	Termination + 7 years
W-2 and W-4 Forms	Termination + 7 years
Garnishments, Assignments, Attachments	Termination + 7 years
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Time Cards/Sheets	2 years
Unclaimed Wage Records	6 years

K. PENSION DOCUMENTS AND SUPPORTING EMPLOYEE DATA

General Principle: Pension documents and supporting employee data shall be kept in such a manner that LWML can establish at all times whether or not any pension is payable to any person and, if so, the amount of such pension.

Record Type	Retention Period
Retirement and Pension Records	Permanent

L. PERSONNEL RECORDS

Record Type	Retention Period
Commissions/Bonuses/Incentives/Awards	7 years
EEO-1/EEO-2 – Employer Information Reports	2 years after superseded or filing (whichever is longer)
Employee Earnings Records	Separation + 7 years
Employee Handbooks	1 copy kept permanently
Employee Medical Records	Separation + 6 years
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	6 years after separation
Employee Contracts – Individual	7 years after separation

Employment Records – Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision
Employment Records – All Non-Hired Applicants (including all applications and resumes – whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	2-4 years (4 years if file contains any correspondence which might be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
Forms I-9	3 years after hiring, or 1 year after separation if later

M. PROPERTY RECORDS

Record Type	Retention Period
Correspondence, Property Deeds, Assessments Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreement	Permanent
Property Insurance Policies	Permanent

N. TAX RECORDS

General Principle: LWML must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return.

These documents and records shall be kept for as long as the contents thereof may become material in the administration of federal, state, and local income, franchise, and property tax laws.

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
Excise Tax Records	7 years
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years

Tax Returns – Income, Franchise, Property	Permanent
Tax Workpaper Packages – Originals	7 years
Sales/Use Tax Records	7 years
Annual Information Returns – Federal and State	Permanent
IRS or other Government Audit Records	Permanent

O. CONTRIBUTION RECORDS

Record Type	Retention Period
Records of Contributions	Permanent
LWML's or other documents evidencing terms of gifts	Permanent

P. PROGRAM AND SERVICE RECORDS

Record Type	Retention Period
Gifts of Love, LWML Store, and biennial convention	7 years
LWML convenings	Permanent (1 copy only)
Research and Publications (including <i>Lutheran Woman's Quarterly</i>)	Permanent (1 copy only)

Q. FISCAL SPONSOR PROJECT RECORDS

Record Type	Retention Period
Sponsorship agreements	Permanent

PROPER FILE NAMING CONVENTIONS

The most important thing that a filename can do for a documents collection is to provide a form of **unique identification** (or [UID]) for each digital “asset.” However, if there is an exchange of files with clients or colleagues (often using different computer operating systems), then some standards for cross-platform compatibility to ensure maximum portability need to be observed. Here are the filing naming standards that will avoid potential problems:

- When creating file and folder (directory) names limit your filenames to the characters A-Z, a-z, 0-9, underscore (_), , and hyphen (-).
- Do not use spaces in file names.
- Do not use characters in the file name such as ! | < > ? / \ * : “ # ‘ , .
- Avoid using additional characters such as % \$ ^ ~ +
- Do not use . (dot) in folder names.
- Do not use . (dot) more than once in file names; including the extension; allow programs to automatically generate the proper extension Some common file extensions include .mov (MPEG file), .xml (XML file), .zip (ZIP compressed archive file), .aif (AIFF audio file), .wav (WAVE audio file), .psd (Photoshop graphics file), .jpg (JPEG graphics file), and .png (TIFF graphics file).
- Numbers are permissible; avoid using as the first single character (exception is the date).
- Avoid use of all capital letters.
- Maximum of 255 characters allowed for file names but shorten names where possible – eliminating articles (the, an, a).
- Date files [title]_ “[year]-[mm]-[dd]_” especially for successive editions.
- Meeting documents may have the meeting date at the beginning of the file name.

FOLDER NAMING CONVENTIONS FOR DEPARTMENT MEETING MINUTES

The folder name for department minutes shall be in this format YYYY-YYYY-AA-minutes where YYYY-YYYY is the biennium, AA is the department abbreviation. The department abbreviations are the following:

- CL — Christian Life
- CO — Communication
- GO — Gospel Outreach
- OR — Organizational Resources
- SFM — Special Focus Ministries

Example: 2021-2023-CL-minutes