

DOCUMENT RETENTION POLICY

Society for the Study of School Psychology

ARTICLE I

PURPOSE

The purposes of this document retention policy are for the Society for the Study of School Psychology (the “Organization”) to enhance compliance with the Sarbanes-Oxley Act and to promote the proper treatment of corporate records of the Organization.

ARTICLE II

POLICY

Section 1. General Guidelines. Records should not be kept if they are no longer needed for the operation of the business or required by law. Unnecessary records should be eliminated from the files. The cost of maintaining records is an expense that can grow unreasonably if good housekeeping is not performed. A mass of records also makes it more difficult to find pertinent records. Also, unless otherwise specified, all records shall be maintained in (or, in the case of paper documents, converted to) an electronic format and kept in a manner consistent with procedures specified in Section 4 of this document.

From time to time, the Organization may establish retention or destruction policies or schedules for specific categories of records to ensure legal compliance, and to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that warrant special consideration are identified below. Although minimum retention periods are established, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention, as well as the exception for litigation relevant documents and any other pertinent factors.

Section 2. Exception for Litigation Relevant Documents. The Organization expects all officers, directors, and employees to comply fully with any published records retention or destruction policies and schedules, provided that all officers, directors, and employees should note the following general exception to any stated destruction schedule: If you believe, or the Organization informs you, that Organization records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then you must preserve those records until it is determined that the records are no longer needed. That exception supersedes any previously or subsequently established destruction schedule for those records.

Section 3. Minimum Retention Periods for Specific Categories.

- a) Organizational Documents. Organizational records include the Organization’s articles of incorporation, by-laws and IRS Form 1023, Application for Exemption. Organizational records will be retained permanently. IRS regulations require that the Form 1023 be available for public inspection upon request.
- b) Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of contributions made by donors, accounting procedures, and other

documents concerning the Organization's revenues. Tax records will be retained for at least seven years from the date of filing the applicable return.

- c) Employment Records/Personnel Records. State and federal statutes require the Organization to keep certain recruitment, employment and personnel information. The Organization has not had employees, and currently does not plan to have any in the future. If the Organization hires employees, it will keep personnel files that reflect performance reviews and any complaints brought against the Organization or individual employees under applicable state and federal statutes. The Organization should also keep in the employee's personnel file all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel. Employment applications will be retained for three years. Retirement and pension records will be kept permanently. Other employment and personnel records will be retained for seven years.
- d) Board and Board Committee Materials. Meeting minutes will be retained in perpetuity in the Organization's minute book. A clean copy of all other Board and Board Committee materials will be kept for no less than three years by the Organization.
- e) Press Releases/Public Filings. The Organization will retain permanent copies of all press releases and publicly filed documents under the theory that the Organization should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the Organization.
- f) Legal Files. The Organization will consult legal counsel to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten years.
- g) Marketing and Sales Documents. The Organization should keep final copies of marketing and sales documents for the same period of time it keeps other corporate files, generally three years. An exception to the three-year policy may be sales invoices, contracts, leases, licenses, and other legal documentation. These documents should be kept for at least three years beyond the life of the agreement.
- h) Development/Intellectual Property and Trade Secrets. Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Organization and are protected as a trade secret where the Organization:
 - a. derives independent economic value from the secrecy of the information; and
 - b. has taken affirmative steps to keep the information confidential.The Organization should keep all documents designated as containing trade secret information for at least the life of the trade secret.
- i) Contracts. Final, execution copies of all contracts entered into by the Organization should be retained. The Organization should retain copies of the final contracts for at least three years beyond the life of the agreement, and longer in the case of publicly filed contracts.
- j) Correspondence. Unless correspondence falls under another category listed elsewhere in this policy, correspondence will be saved for two years.
- k) Banking and Accounting. Accounts payable ledgers and schedules will be kept for seven years. Bank reconciliations, bank statements, deposit slips and checks (unless for important payments and purchases) will be kept for at least three years. Any inventories of products, materials, and supplies and any invoices will be kept for seven years.
- l) Insurance. Expired insurance policies, insurance records, accident reports, claims, etc. will be kept permanently.
- m) Audit Records. External audit reports should be kept permanently. Internal audit reports will be kept for three years.

Section 4. Electronic Mail and Documents. The retention period depends upon the subject matter of the e-mail or document, as covered elsewhere in this policy. However, the following policies shall apply:

- a) All officers and directors shall conduct Organization business using their Organization Gmail accounts (e.g., treasurer.sssp@gmail.com).
- b) Records and documents an officer or director creates or receives when conducting the Organization's business shall be stored electronically on the drive associated with the Gmail account. Officers and directors must scan and store an electronic facsimile (e.g., PDF) of all paper documents relevant to the Organization on their Google drive. Officers and directors will then destroy the original paper document(s) in a manner that maintains appropriate security (e.g., shredding of confidential information).
- c) In contrast to working documents described in Section 4(b) above, all documents officially adopted by the Organization (e.g., meeting minutes, handbooks, policies, reports, bylaws) shall be retained in the Organization's Dropbox folder.
- d) All officers and directors will provide the Director of Operations access to their Gmail account via a secure medium (e.g., text, written letter, phone call), and not via email.
- e) When an officer or director leaves the Organization, the departing officer or director will provide the new officer or director with access to the Gmail account, including all archived emails and documents associated with the account. The incoming officer will change password protections on the Gmail account for security, and will provide the new password to the Director of Operations.
- f) All Gmail accounts used for Organizational business shall employ two-factor authentication to increase security and reduce risk of unauthorized access to Organizational records.
- g) All documents with Personally Identifiable Information (PII) must be stored in accordance with the Organization's operational manual describing such records (i.e., encrypted and then destroyed seven years after the last payment received by the individual).