



Document Retention and Destruction Policy

Arab Student Aid International (ASAI)

Adopted by the Board of Directors on January 15, 2021

1. Purpose

The purpose of this policy is to ensure that Arab Student Aid International (ASAI) maintains accurate, complete, and secure records documenting its activities, programs, and financial operations, and that such records are retained for the appropriate period of time in accordance with federal, state, and local laws. This policy also establishes guidelines for the proper destruction of records once they are no longer needed, protecting both the organization and the individuals it serves.

2. Policy Statement

ASAI is committed to the responsible management, retention, and destruction of its documents and records. The organization will retain records as long as required by applicable laws, regulations, or business needs and will dispose of them securely when they are no longer necessary. No document will be destroyed if it may be relevant to a current or anticipated legal proceeding, government investigation, or audit.

3. Responsibilities

The Executive Director is responsible for implementing this policy and ensuring that all staff, volunteers, and board members understand their obligations under it. The Treasurer and the organization's accountant are responsible for overseeing the retention of financial and tax-related records. All employees, interns, and volunteers must comply with this policy and obtain proper authorization before destroying any records.

4. Retention Periods for Major Record Categories

Certain records must be retained permanently. These include articles of incorporation, bylaws, amendments, the IRS determination letter recognizing ASAI's tax-exempt status, minutes of the board of directors and committees, organizational policies, and annual financial statements and audit reports.

Financial and accounting records, such as ledgers, budgets, bank statements, canceled checks, wire confirmations, payroll information, and grant-related financial documentation, shall generally be retained for seven years. Federal and state tax returns, including all supporting schedules and documentation, must be retained permanently.

Program-related documents, including student applications, loan or grant agreements, and reports from universities or partner institutions, should be kept for at least seven years after the conclusion of the program or grant period. Donor records, contribution acknowledgments, and correspondence related to fundraising activities should also be kept for seven years after the last donation or contact.

Contracts, memorandum of understanding, leases, insurance policies, and other legal documents should be maintained for seven years following their expiration or termination, except for those that have continuing legal or historical value, which should be retained permanently.

Personnel files, including employment applications, performance evaluations, and termination records, shall be maintained for seven years after the end of employment. Volunteer and intern records shall be kept for at least three years after completion of service. Time sheets and payroll records must be kept for seven years.

Digital and electronic records, including email correspondence related to legal, financial, or organizational matters, will be retained for seven years unless otherwise specified. Backup data stored on secure cloud systems or servers will follow the same retention period as the original records.

5. Suspension of Destruction (Legal Hold)

In the event of litigation, audit, or government investigation, the Executive Director shall immediately issue a “legal hold” order suspending all document destruction. All personnel will be informed and required to preserve any and all records that may be relevant until the legal hold is lifted in writing.

6. Method of Destruction

Records that have reached the end of their retention period will be destroyed in a secure and confidential manner. Paper documents containing confidential or sensitive information will be shredded or destroyed by a professional document disposal service. Electronic records will be permanently deleted from systems, servers, and backups in a manner that prevents recovery or reconstruction. Under no circumstances shall documents be discarded in ordinary waste bins or unsecured digital locations.

7. Electronic Records and Backups

Electronic files are subject to the same retention and destruction rules as physical records. ASAI will maintain secure digital storage systems, including password-protected servers or cloud

services, and ensure that backup copies of critical files are retained for disaster recovery purposes.

8. Review and Compliance

This policy will be reviewed at least once every 10 years by the Governance Committee or the Executive Director to ensure compliance with applicable regulations, IRS guidance, and best practices for nonprofit organizations. Revisions will be presented to the Board of Directors for approval.