LIMITLESS COMMUNITY DEVELOPMENT
RECORDS RETENTION AND DESTRUCTION POLICY

Effective July 1, 2026

1. Purpose

Limitless Community Development (LCD) adopts this Records Retention and Destruction Policy to ensure that organizational records are maintained for appropriate periods, confidential and sensitive information is protected, legal and contractual requirements are met, and records that are no longer required are disposed of in a secure and consistent manner.

2. Scope

This policy applies to LCD directors, officers, employees, volunteers, contractors, and others who create, receive, maintain, or control LCD records. It applies to records in all formats, including paper files, email, electronic documents, accounting systems, cloud storage, databases, photographs, text messages used for organizational business, and other electronic communications.

3. Responsibility

The CEO is responsible for the day-to-day administration of this policy, with oversight by the Board of Directors. Staff members are responsible for maintaining records within their areas of responsibility and following the retention schedule below. The Board, legal counsel, auditor, CPA, funder, or other authorized advisor may recommend a longer retention period when appropriate.

4. Records Retention Schedule

Record Type	Minimum Retention
Articles of incorporation, bylaws, IRS determination letters, tax-exempt status documents, major governance policies, Board and committee minutes, major resolutions	Permanent
Annual financial statements, audits, Form 990 filings and supporting tax records	Permanent
General ledgers, year-end financial reports and significant accounting records	Permanent
Bank statements, reconciliations, invoices, receipts, accounts payable/receivable records, expense documentation and routine accounting records	7 years
Grant agreements, applications, award letters, reports and supporting program/financial documentation	7 years after closeout, or longer if required
Contracts, leases, MOUs and vendor agreements	7 years after expirati on/termination
Payroll records and payroll tax documentation	7 years
Personnel files	7 years after separation

Record Type	Minimum Retention
Employment applications for individuals not hired and routine recruitment records	3 years
Insurance policies, claims and related records	Permanent for policies/significant claims; otherwise 7 years
Property deeds, titles, major asset records and ownership records	Permanent while relevant; disposition records 7 years
Donor records and contribution documentation	7 years; permanent for lasting restrictions
Program participant/service records	At least 7 years after inactive, unless other requirements apply
General correspondence and routine administrative records	3 years unless subject matter requires longer
Electronic communications	According to underlying subject matter

5. Legal Hold and Suspension of Destruction

No record may be destroyed if LCD knows or reasonably anticipates that the record may be relevant to litigation, an audit, investigation, government inquiry, subpoena, claim, dispute, or other legal or regulatory proceeding. Upon notice of such a matter, routine destruction of potentially relevant records must stop immediately. Records subject to a legal hold must be preserved until the hold is formally released.

6. Electronic Records

Electronic records are subject to the same retention requirements as paper records. Records should be stored in approved organizational systems whenever practicable and organized so they can be located and produced when needed. Employees and representatives should not rely solely on personal devices, personal email accounts, or personal cloud storage to maintain official LCD records.

7. Confidential and Sensitive Information

Records containing personal, financial, personnel, donor, participant, health-related, banking, identification, or other confidential information must be protected against unauthorized access, disclosure, alteration, or loss. Access should be limited to individuals with a legitimate organizational need.

8. Secure Destruction

When the applicable retention period has expired and no legal hold or other preservation requirement applies, records may be destroyed. Paper records containing confidential information should be shredded or otherwise securely destroyed. Electronic records should be deleted using reasonable methods designed to prevent unauthorized recovery.

Destruction should be carried out consistently and not selectively to conceal or remove unfavorable information.

9. Duplicate and Convenience Copies

Duplicate copies, drafts, transitory communications, and convenience copies that are not official records may generally be destroyed when they are no longer needed, provided they are not subject to a legal hold and do not contain unique information that must be retained.

10. Compliance

Failure to comply with this policy may expose LCD and individuals to legal, financial, contractual, or operational risk. Questions regarding whether a record should be retained or destroyed should be referred to the CEO or Board Chair before action is taken.

11. Review of Policy

The Board of Directors may review and revise this policy periodically to reflect changes in applicable law, contractual requirements, funder requirements, organizational operations, and recognized nonprofit governance practices.

Acknowledgment

I acknowledge that I have received and reviewed the Limitless Community Development Records Retention and Destruction Policy and agree to comply with its requirements.

Name: ____

Signature: ______________________________ Date: _______________