

WARRIOR CANINE CONNECTION DOCUMENT MANAGEMENT, RETENTION AND DESTRUCTION POLICY

This Document Management, Retention and Destruction Policy identifies the document and information management, filing, storage, retention and destruction protocols and responsibilities of Warrior Canine Connection (“WCC”) staff and members of the Board of Directors.

General Policies:

1. WCC will retain records in an orderly fashion for time periods that comply with legal and governmental requirements, and as needed for general business requirements.
2. Access to confidential information must be limited to the appropriate level of management or to those individuals who are required to have such access to perform their work.
3. Files and information must be clearly labeled and filed in an organized manner. Document and file titles, in electronic or paper form, should follow common sense naming conventions that make the type of file or document, subject, date of creation, and level of security easy to find and identify. For example, folders and subfolders grouped by subject matter, populated with documents that have clear titles and dates in the file path, and stored in locations appropriate to the level of confidentiality required.
4. All staff must complete HIPAA training at least on an annual basis, and all HIPAA security and information management protocols must be followed.
5. After two years, paper files may be placed in storage, onsite or offsite, unless a different time is required by this policy. If onsite or offsite paper file storage is used, it should have the appropriate level of security based on the materials being stored. Storage locations and containers used should be sufficient to protect the files from weather or other damage such as rodents or mold.
6. Department managers or directors are required to review this policy on an annual basis to assure the types of documents or information used and maintained by the department is adequately reflected herein, and to make recommendations to the Executive Director or his/her designee on adjustments to the requirements stated here.
7. No paper or electronic documents, including correspondence, will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding, or private litigation (check with legal counsel or the human resources department for any current or foreseen litigation if employees have not been notified).
8. No paper or electronic documents will be destroyed or deleted if retention is required to comply with government auditing standards.
9. Whenever feasible, records and materials should be maintained directly in Salesforce or other secure software platforms.

10. Unless specifically stated otherwise in the table below: (a) paper documents may be destroyed after three years, and (b) other electronic documents may be deleted from all individual computers, data bases, and networks after one year; provided however, that electronic files may be deleted earlier from individual systems sooner if a backup is made.

11. Paper records scheduled to be destroyed should be shredded unless the Executive Director has approved a different method of destruction.

12. Employees are not permitted to erase emails from WCC accounts prior to termination or conclusion of employment, and appropriate steps must be taken to prevent access and unauthorized deletion of emails once a termination decision is made.

13. Employee (non-executive) email accounts should be reviewed by the Department Director or approved designee, and sensitive materials saved or archived, prior to account deletion.

14. Employees are not permitted to retain company documents on non-WCC computers or systems.

Record Retention Timelines

The following table indicates the minimum document retention policies of WCC based on the type of document. Because statutes of limitations and state and government agency requirements may change or vary from state to state, this policy should be reviewed by WCC management on an annual basis. Paper or electronic documents identified below will be maintained centrally at WCC headquarters and Department Directors are responsible for proper maintenance and retention of records applicable to their department.

Type of Document	Minimum Requirement
Accounting and Financial Documents:	
Accounts payable ledgers and schedules	7 years
Audit reports	Permanently
Bank reconciliations	3 years
Bank statements	3 years
Checks (for important payments and purchases)	Permanently
Determination letter for income tax exemption	Permanently
Depreciation schedules	Permanently

Type of Document	Minimum Requirement
Duplicate deposit slips	2 years
Expense analyses/expense distribution schedules	7 years
Year-end financial statements	Permanently
Internal audit reports	3 years
Internal financial statements	3 years
Inventory records (products, materials, and supplies)	3 years
Invoices (to customers, from vendors)	7 years
Payroll records and summaries	7 years
Tax returns and worksheets	Permanently
Withholding tax statements	7 years
Donor records	7 years
Legal and Property Documents:	
Contracts and MOU's (after expiration)	7 years
Leases (after expiration)	7 years
Correspondence (legal and important matters)	Permanently
Internal policies (after replacement or expiration)	3 years
Deeds, mortgages, notes, and bills of sale	Permanently
Insurance records, accident reports, claims, policies (active and expired)	Permanently
Patents, trademark registrations, copyrights, and related papers	Permanently
Volunteer releases and liability waivers	7 years
Board Records and Documents:	
Board Reports (reports submitted to the Board by staff)	Permanently

Type of Document	Minimum Requirement
Minutes and committee documents	Permanently
Board member lists	Permanently
Bylaws and corporate charter documents	Permanently
Personnel Files and Human Resource Documents:	
Employee handbook (after replacement)	7 years
Employment applications	3 years
Personnel files (terminated employees)	7 years
Retirement and pension records	Permanently
Timesheets	7 years
Credentials of staff working under third party contract, e.g. clinical site work (after contract or employment termination)	3 years
Canine Records:	
All veterinary records, behavior assessments, pedigree information, other records required by ADI	Permanently
Puppy Parent Records:	
Application, contract, emergency contacts, disclosures, checklists, waivers, media release, emergency treatment form, other ADI required records	3 years
MBTR Records:	
Daily logs, monthly reports, KPI data, session notes, releases, applications (after participation has ended)	3 years
General Business / Other Documents:	
Correspondence (general)	2 years
Correspondence (with customers and vendors)	2 years

Type of Document	Minimum Requirement
Key Performance Indicator (KPI) reports and summaries	Permanently
Senior management email files (after termination)	7 years
Research studies and final reports (if WCC directly involved)	Permanently
Research supporting documents (after publication)	5 years (or as required)



WARRIOR CANINE CONNECTION EXECUTIVE DIRECTOR COMPENSATION POLICY



According to the Warrior Canine Connection Bylaws, the Executive Director may receive reasonable compensation for his or her services. The annual process for determining Executive Director compensation is as follows:

1. The Warrior Canine Connection Board of Directors, through the Executive Committee, will annually evaluate the Executive Director on his/her performance, and make a recommendation to the full Board regarding Executive Director compensation (salary and benefits).
2. The Executive Director will be given the opportunity to provide his/her input on matters of performance and compensation.
3. Prior to making its recommendation to the full Board regarding compensation, the Executive Committee will review data and information which documents compensation levels and benefits for similarly qualified individuals in comparable positions at similar organizations. Such data and information may include, for example:
 - (a) Salary and benefit compensation studies by independent sources;
 - (b) Written job offers for positions at similar organizations;
 - (c) Documented telephone calls about similar positions at both nonprofit and for-profit organizations; and
 - (d) Information obtained from the IRS Form 990 filings of similar organizations.
4. To approve the compensation for the Executive Director, the Board must document how it reached its decisions, including the data on which it relied, in minutes of the meeting during which the compensation was approved. Such documentation will include:
 - (a) A description of the compensation and benefits and the date it was approved;
 - (b) The members of the board who were present during the discussion about compensation and benefits, and the results of the vote;
 - (c) A description of the comparability data relied upon; and
 - (d) Any actions taken (such as abstaining from discussion and vote) with respect to consideration of the compensation by anyone who is otherwise a member of the Board but who had a conflict of interest with respect to the decision on the compensation and benefits.
5. The President of the Board of Directors will operate independently without undue influence from the Executive Director, and no member of the Executive Committee will be a staff member, the relative of a staff member, or have any relationship with staff that could present a conflict of interest. If the Executive Director is a member of the Board, he or she may not serve on the committee or vote on matters pertaining to his or her compensation.
6. The Board of Directors may by resolution constitute and appoint a separate compensation committee to perform the Executive Committee duties and functions identified herein.