

Document Retention and Destruction Policy

WhidbeyHealth Foundation

Purpose

WhidbeyHealth Foundation is committed to maintaining accurate and complete records to support its mission, comply with legal requirements, and preserve donor and community trust. This policy establishes guidelines for how long records are kept and how they are securely destroyed when no longer needed.

Scope

This policy applies to all Foundation records, whether physical or electronic, including but not limited to:

- Financial documents
- Donor and fundraising records
- Governance and Board materials
- Legal and contractual documents
- Communications and marketing files
- Administrative and operational records

HIPAA Compliance

As part of a healthcare organization, the Foundation may come into incidental contact with protected health information (PHI). All records that contain or may contain PHI will be handled in accordance with the Health Insurance Portability and Accountability Act (HIPAA) to ensure confidentiality, integrity, and security. Such records will be retained and destroyed in compliance with HIPAA requirements and any applicable state privacy laws. Staff and volunteers must be

trained to recognize and appropriately manage any PHI in accordance with HIPAA privacy and security standards.

Retention Guidelines

The following general timelines apply unless laws, contracts, or special circumstances require longer retention:

- **Governing Documents (Articles, Bylaws, Board Minutes):** Permanent
- **Financial Records (audits, tax returns, ledgers):** 7 years
- **Donor Records (gift agreements, acknowledgments, correspondence):** 7 years after last activity
- **Grant Records (proposals, reports, agreements):** 7 years after grant completion
- **Contracts and Leases:** 7 years after expiration
- **Personnel and Employment Records:** 7 years after termination
- **Insurance Policies:** 7 years after expiration
- **Routine Administrative Correspondence and Drafts:** As needed, typically 2 years

Note: Records relating to ongoing investigations, audits, or litigation must be preserved until resolution.

Destruction Procedures

When records reach the end of their retention period, they will be securely destroyed to protect confidentiality.

- **Paper documents:** Shredded or securely disposed of.
- **Electronic files:** Permanently deleted from storage systems.
- **Backups:** Overwritten or securely erased.

Responsibility

The Executive Director, in consultation with the Board and legal/financial advisors as needed, is responsible for ensuring compliance with this policy. Staff and volunteers are expected to follow these guidelines in handling Foundation records.

Review and Updates

This policy will be reviewed periodically and updated as necessary to reflect changes in legal requirements, best practices, or organizational needs.