

**Madison Audubon Society, Inc.**  
**Recordkeeping Policy**

**I. PURPOSE**

Madison Audubon Society recognizes that maintenance of consistent, complete, secure, and authentic records is essential to the achievement of its mission. The MAS Recordkeeping Policy is developed to ensure, in perpetuity, MAS compliance with the intentions of all donors, including donors of real property, and to document and sustain the conservation values of preserved lands under conservation easement or in fee simple ownership, and to secure MAS' charitable status. This policy relates to the retention and storage of financial, fundraising, general office and land-related records and ensures they are preserved for an appropriate amount of time. Any given record does not need to be destroyed after the listed time, but must be retained for at least that time.

**II. AUTHORITY FOR THIS POLICY**

Authority for this policy is provided by the MAS bylaws and corporate law. This policy is adopted by the MAS board of directors. This policy is applicable to all MAS staff, volunteers and board members. All MAS files are the property of MAS and not of staff or board members. Additionally, the MAS executive director is empowered to develop and amend procedural documents as needed to implement the Recordkeeping Policy.

**III. FINANCIAL RECORDS**

As a public charity MAS must manage its finances and assets in a responsible and accountable manner. To that end, it is the policy of MAS to maintain complete, accurate and credible documentation of its financial management activities.

MAS staff shall follow generally accepted non-profit accounting principles to ensure clear and credible financial records. To the extent possible, internal controls and separation of duties shall be established and followed to prevent misappropriations and to ensure credible records. An annual independent audit or review by a certified public accountant shall be performed. The auditor's report shall be made available to funders, members, and donors.

The types of financial records to be maintained include a) MAS accounting software, b) monthly, quarterly, and annual reports, c) balance sheets, d) budgets, e) reconciliations and

cancelled checks, f) invoices and receipts of payables, g) copies of checks deposited, and h) copies of donor restrictions.

Access to these records is limited to the executive director, board and, when appropriate, the Financial Assistant, due to the confidential nature of certain contents (i.e., payroll). Specific reports that do not contain confidential information shall be made available to staff and volunteers as needed. The accounting software is password protected, as are certain digital financial reports.

#### **IV. PERSONNEL RECORDS**

Personnel records contain each employee's personal information and work-related information, are maintained for each employee and shall be held confidential. Access to personnel files is limited to the executive director, officers of the board, and Financial Administrator, when appropriate. Employees shall be given access to their individual files. Physical personnel records shall be stored with financial records.

#### **V. PAYROLL RECORDS**

All employees shall complete the appropriate forms and other records necessary to be placed on the payroll and acknowledge receipt of the Personnel Policies. Evidence of certain information for benefits and other personnel records shall be required as a condition of employment. Payroll records are maintained by the executive director for each employee. To protect employee privacy, MAS restricts information about employment records from others unless written authorization by the employee is provided, or as required to provide information by law. The only information that shall be released without written authorization is the dates of employment, position held and work location. Additional information shall be provided when requested in writing and authorized by a signed release or other legal authorization.

#### **VI. PRIVACY OF PERSONAL INFORMATION**

The privacy and confidentiality of each employee's personal data (such as SSN and medical information) shall be maintained by MAS. Documents containing personal data shall be kept in confidential files. Except as required by necessary and legitimate business purposes, no employee may access personal data or keep, use, copy, or distribute another person's data, or in any other way disclose another's personal data. Anyone who accesses personal data for necessary and legitimate business purposes must do this in a manner that avoids access by unauthorized individuals and with the knowledge and approval of the executive director.

## **VII. FUNDRAISING RECORDS**

Fundraising records are maintained in a donor software program. Access to this software is password protected. All documentation indicating the intent of the donor for restricted and unrestricted gifts shall be kept on file according to the accompanying guidelines. In addition, if project or time use restrictions are placed on the gift, this documentation shall also be kept according to the accompanying guidelines. If the gift is designated as permanently restricted (e.g., an endowment), the documentation shall be kept in perpetuity. When documents are expired or no longer needed, all documents must be shredded, or otherwise disposed of to ensure confidentiality.

## **VIII. OUTREACH RECORDS**

All publications shall be kept in an archive file for the purposes of creating a historical record of MAS activities and accomplishments. Other outreach records such as press releases and news articles shall be saved accordingly. These files are kept by MAS staff members and volunteers and are not confidential.

## **IX. ADMINISTRATIVE RECORDS**

Minutes of board meetings and Executive Committee meetings shall be maintained in a secure manner. Paper copies of the official minutes shall be organized chronologically and maintained at the MAS office. Electronic copies of board minutes, as well as the entire board packet, are saved by the executive director to the MAS computer system.

## **X. COMPUTER SYSTEM AND RECORDS**

Access to the computer records of MAS is protected through an employee password system. The only employee who has complete access to all areas of the computer system is the executive director, or any other person(s) so designated by the executive director. All files are backed up weekly to a cloud based data backup system. The system does not overwrite previous saves, but rather creates a new copy of all files and stores previous saves for a period of one month.

## **XI. NOTICE OF LEGAL INQUIRY**

In the event MAS receives notice of a legal inquiry into its operations, all documents reasonably believed relevant to that legal inquiry shall be preserved.

## **XII. LAND AND STEWARDSHIP RECORDS**

The MAS mission of land and habitat conservation requires sound management and storage of completed and existing land project files. The executive director shall ensure staff shall create and maintain sufficient documentation and records for all existing and future conservation easement and fee land projects.

### **A. Permanent Files**

Permanent files are MAS' completed land purchase and easement acquisition projects. These files are safely stored in a way that ensures that they shall last and be acceptable evidence in the event of a court proceeding. The executive director, or other MAS staff appointed by the executive director, is responsible for maintaining the permanent files.

Permanent files take two forms: paper and electronic. MAS shall ensure that original documents are protected from daily use and are reasonably secure from fire, floods or other foreseeable hazards by storing irreplaceable documents (listed below) in labeled folders within the locked, MAS fireproof (UL 1-hour class 350 fire rating) and water-resistant file cabinet that is located in the MAS offices. MAS offices are on the ground floor of a building that meets City of Madison safety codes. The executive director or other MAS staff appointed by the executive director will have access to cabinet key, which is stored in the MAS office safe. In addition, scanned electronic copies of irreplaceable documents shall be placed in a locked, password-protected cloud-based folder. The executive director or other MAS staff appointed by the executive director will be provided with the instructions and password to access this folder. The password shall be changed in the event of turnover in staff with knowledge of the password.

Hard copy duplicates of irreplaceable project documents shall be stored in file cabinets separately from the originals where MAS has full control over the retention of the document. Electronic duplicate files shall be stored on the main MAS computer server and on a secure cloud-based file storage system as specified in Section X above. Electronic duplicates shall be replicas of the signed originals with all exhibits and attachments in a format that cannot be altered (i.e., not draft or unsigned versions of documents).

Irreplaceable Documents include:

Document	Original	Duplicate
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	<b>Required</b>	<b>Required</b>
Legal agreements, deeds, conservation easements, amendments, etc.	Yes	Yes
Critical correspondence with land owner	Yes	Yes
Baseline documentation report for conservation easements	Yes	Yes
Title insurance policies or evidence of title investigation	Yes	Yes
Surveys, if any	Yes	Yes
Full appraisals, or summary if full appraisal is not available	Yes	No
Form 8283 for projects where the landowner claimed a tax deduction (original can be a copy of the landowner's signed original)	Yes	No
Monitor reports (conservation easements and fee land)	Yes	No
Fee property inspection records essential to stewardship and defense of the property	Yes	No
Contracts and leases relative to long-term management of fee lands	Yes	No

## **B. Working Files**

Working files shall be created for each completed land conservation project and shall be stored in binders and file cabinets at the MAS office. These files are copies of the permanent files that are used daily by MAS staff. Working files may have additional information on the conservation project that would not need to be stored in off-site storage. These copies shall be accessible to the board and staff members. They are stored per project in folders labeled as such in the MAS office. These files may travel outside the office during monitoring visits, but should remain protected from the elements. Electronic working files for each conservation project are stored on a cloud-based server and accessible from the MAS office computer network.

## **C. Active Land Projects**

Active land project files shall be maintained at the MAS office and shall be accessible to the board and staff members. All information in these files shall be confidential. The MAS land protection staff shall develop at minimum an electronic land project file for all inquiries of land acquisition.

These files shall contain information such as:

- Assessment opinion from MAS staff and partners
- Correspondence with landowner
- Property Information such as aerial photographs, parcel maps, and topographic maps
- Contact information
- Property tax Information
- Other relevant project information as identified in Section XII, A. Permanent Files.

#### **D. Conservation Easement Field Copy**

Each completed conservation easement project shall have a field copy available for monitoring and enforcing. The field copy shall include copies of the baseline document, annual monitoring reports, management plans, contact information and reserved rights requests. Items for each easement shall be stored in individual binders and stored in the MAS office.

#### **E. Land Transfers**

Records for properties that are acquired by MAS through either donation or purchase and then given to a partner or sold (see also *Gift Acceptance and Administration Policy*) shall be treated as 'permanent files' until the divestiture. At that time, critical files (e.g., deed) may be turned over to the acquiring party. Any records related to deed restrictions or other contracts retained by MAS after divestiture of the property shall be retrained as permanent files.

One copy of the transaction, with pertinent records shall be kept in permanent hardcopy storage. An electronic record of the transaction shall also be maintained.

### **XIII. RECORDKEEPING POLICY REVIEW**

The executive director or other appropriate MAS staff and one or more committees or subcommittees of the board shall review this Recordkeeping Policy at least every three years to ensure organizational compliance and to ensure that the policies stated herein continue to serve in the best interests of MAS. The executive director or other MAS staff shall review specific record retention procedures at least every five years to ensure organizational compliance and to ensure that the procedures therein set forth continue to serve the best interests of MAS.

### **XIV. RECORDS DESTRUCTION**

Destruction of business records at the expiration periods listed in MAS's Records Retention Schedule below shall be completed by the Executive Director, or designated staff, but only after approval by the MAS Executive Director. Documents will be shredded to ensure the privacy or records.

### **XV. RECORD RETENTION SCHEDULE**

**Corporate Organization Records**

Constitution (corporate charter)	Permanent
Articles of Incorporation	Permanent
Bylaws	Permanent
IRS determination letter	Permanent
Documents with continuing legal or tax significance	Permanent
State tax-exempt documents	Permanent
Annual reports	Permanent
Minutes of board of directors meetings	Permanent
Newsletter - two copies of each issue	Permanent

**Accounting Records**

General journal and ledger	Permanent
Cash receipts and disbursement journals	Permanent
Accounts receivable and accounts payable ledgers	7 years
Bank statements and cancelled checks	7 years
Payroll records (payroll company statements)	Permanent
Time sheets	7 years
Financial statements - annual (audit)	Permanent
Financial statements - monthly/quarterly	7 years
Petty cash records	4 years

**Fixed Assets**

Land and buildings (acquisition records, as identified in Section XII, A. Permanent Files, and capitalized improvements)	Permanent
Equipment in use	Keep on file
Equipment traded in to similar asset	Keep on file
Equipment disposed of (no trade-in)	7 years

**Tax Records**

Federal form 990	Permanent
State tax forms	Permanent
Payroll tax returns	5 years
Withholding tax statements (W-2s)	7 years

**Contracts**

Leases (after termination)	7 years
Grant agreements	10 years
Restricted fund documentation (e.g. individual donation records)	10 years

**Personnel Records**

Individual employee records	Permanent
Employee insurance records	Permanent
Applications, resumes (before employment)	1 year
Performance evaluations	7 years after termination
Continuing professional education records	4 years after termination
Employment contracts	7 years after termination
Salary information	7 years after termination
INS I-9 forms	Longer of 3 years from date of filing or 1 year after termination

**General Correspondence**

5 years

*Approved by Board of Directors August 10, 2015*