



Taking Action to Prevent Hunger and Homelessness

Records Retention Policy

1. Purpose: Center for Food Action has established this Records Retention Policy to help it manage its records efficiently, report its performance accurately, substantiate its disclosures, and comply with applicable laws relating to preservation and confidentiality of such records. These laws include the Internal Revenue Code, the Sarbanes-Oxley Act, other statutes, and court rules of procedure.
2. Covered documents and people: This Policy covers documents in electronic as well as hard copy format. It covers CFA's directors, officers, employees, volunteers and, as appropriate, vendors and other outside providers.
3. Compliance: CFA is committed to compliance with legal requirements relating to document integrity, document retention, and privacy. CFA will retain documents as necessary to comply with law and as needed for operations and will seek to retain them no longer than is needed for such purposes. CFA may establish retention schedules for specific categories of records; several such schedules are set out in the table below. While the table reflects minimum retention schedules for certain categories of records, retention of a document, whether or not identified in the table, and of documents not identified in the table, should be determined primarily by application of the general principles of this policy and the specific requirements below relating to litigation-relevant materials.
4. Legal proceedings: CFA will not alter, destroy, mutilate, conceal, cover up, falsify, or make a false entry in a record, or attempt to do so, with the intent to impair the record's integrity or availability for use in a legal proceeding (defined below) or impede, obstruct, or influence a legal proceeding. If CFA learns of, or reasonably anticipates, a claim that may give rise to a legal proceeding, the agency will take appropriate actions, including cessation of destruction of records, to ensure safeguarding of records relevant to the legal proceeding. "Legal proceeding" means any investigation, civil or criminal litigation, official proceeding, or any proper administration of any matter within the jurisdiction of any department or agency of the United States or of any state or local government.
5. Administration: Management is responsible for administering this Policy in a manner that is reasonably attainable given CFA's resources and administrative capacity. Those responsibilities include:
 - a) setting standards for data collection and security;
 - b) overseeing protocols for compliance with privacy laws and Client's own privacy policies;
 - c) setting standards for document integrity, such as guidelines for backup and archiving procedures, document retention in case of an emergency, and checkups of system reliability;
 - d) consulting with Client associates about storage and destruction of specific categories of documents; (e) issuing instructions with respect to litigation matters; and
 - e) reviewing arrangements with volunteers and outside providers.



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6. Non-compliance consequences: Failure to comply with this Policy, including, particularly, disobeying any destruction halt order, could result in possible civil or criminal penalties including fines and imprisonment, contempt orders, litigation sanctions, disciplinary action for individual employees, and increased costs and inefficiencies.

7. Relationship to laws and contracts: This Policy is intended to supplement and not supersede any applicable federal and state laws, or any contracts to which Client is party, relating to retention and confidentiality of specific documents and information.

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