

BSA Record Retention and Destruction Policy for Local and National Councils (effective 1-1-2019)

Official records of the Boy Scouts of America must be retained for as long as they are in use or retention is necessary for historical reference or contractual or legal requirements. Records and documents outlined in this policy include paper, electronic files (including email), and voicemail records, regardless of where the document is stored, including network servers, desktop or laptop computers, handheld computers, and other wireless devices with text messaging capabilities. Records may be retained in paper or digital form. **Councils are encouraged to consider batch scanning documents into PDF format for long-term storage.**

This policy specifies a minimum retention period. If it appears prior to or at the expiration of the retention period that a record should be retained longer, then steps must be taken to safeguard the file and indicate when it will be appropriate to purge the record. This policy is intended to provide general parameters for the retention of records. Ambiguities and exceptions must be resolved by proper written approval and documentation.

It is against Boy Scouts of America policy to knowingly destroy a record or document with the intent to obstruct or influence an investigation. If notice of an ongoing investigation or a legal hold is placed on records or documents, the records or documents are to be segregated and/or duplicated and placed in a safe location until notice that the investigation is over, or the legal hold is lifted. Documents subject to a litigation hold or which may relate to a pending or threatened lawsuit must be retained until the suit is resolved. If there are any questions regarding documents which may need to be retained due to a pending or threatened lawsuit, call the legal department.

Prior to the destruction of any records or documents regardless of form or how its stored, approval for the destruction shall be obtained from the department head of the originating department, the legal department and the records management team leader. Destruction approval may be accomplished by paper or digital approval and a record of the approval is to be permanently obtained in digital format. Paper records and documents containing confidential, personal, or other sensitive information shall be identified on the destruction approval form for shredding where appropriate.

| Type of Document | Retention Period | Format |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------|
| Corporate Records | | |
| Articles of incorporation/bylaws | Permanent | Digital |
| Minutes and resolutions | Permanent | Digital |
| Annual reports | Permanent | Digital |
| Copyright & trademark registrations, deeds, royalties, trusts, wills/bequests (records that are required by law for documentation) | Permanent | Original |
| Executive board conflict of interest | 7 years | Digital |
| Policies and procedures | 10 years after obsolete | Digital |
| Organizational Charts | Permanent | Digital |
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| Awards (documents containing multiple categories, such as application to attend with integrated release from liability, should be kept the longer of the periods specified) | | |
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| Eagle, Silver Buffalo, Beaver, Fawn, Wood Badge, O/A, Lifesaving, Whitney M. Young, Hornaday, etc. | Permanent | Digital |
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| Type of Document | Retention Period | Format |
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| Contract Files The contract file includes bids, performance- and acceptance related documents including correspondence, insurance certificates, and other performance-related documents. | Expired + 10 years | Digital |
| Benefits Retirement plan, refunds, window, gift history, consultants, tax annuities, SEA (Scout Executives' Alliance), consultants, tax annuities, tax folders, vendor claim reports (United Healthcare audit), pension records | Permanent | Digital |
| Death folders/SEA (Scout Executives' Alliance) beneficiary (request for benefits of a member) | 7 years | Digital |

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| Financial Accounting records: General journal, general ledger — yearend file copy with supporting details, grants, fixed assets and depreciation, account notice files, chart of accounts | Permanent | Digital |
| Statements: Cash and investment statements, notes receivable, travel expense reports, financials, budgets, payroll records, year-end physical, credit card receipts, inventory reports, subsidiary ledgers, bank statements | 7 years | Digital |
| Invoices: Account payable/receivable invoices, A/P control, group reports, purchase orders, internal audit reports | 4 years | Digital |
| Tax-exempt bonds | Permanent | Digital |
| Forms | While current | Digital |
| Health and Safety Incident and investigation reports (incident specific with attachments such as medical records, plans, camp inspections, logs, etc.) | 18 years | Digital |
| Reports, plans, inspection reports, and first-aid logs | 5 years | Digital |
| Type of Document | Retention Period | Format |

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| Insurance | | | |
| Claim files (workers' compensation, liability claims, general litigation files, auto claim files) | Permanent | | Digital |
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| Insurance policies, Certificate of Insurance (COI), actuarial studies, ESIS contracts | Permanent | | Digital |
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| Tour permits/tour and activity plans | Keep only till April 1, 2021 | | Digital |
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| Membership Records | | | |
| Applications (including Eagle applications) | Permanent | | Digital |
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| Authorization and disclosure forms | Permanent | | Digital |
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| Background checks | Permanent | | Digital |
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| Ineligible files (leaders, youth, and reviews) | Permanent | | Digital |
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| Unit rosters and Troop Histories | Permanent | | Digital |
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| Youth Protection incident and investigation reports | Permanent | | Digital |
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| Documentation/application of clearances or background checks | Permanent | | Digital |
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| Personnel Records | | | |
| Attendance, illness, resumes, relocation, unemployment claims, goals, promotions, and other related reports | 3 years | | Digital |
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| Conflict of Interest Policy — signed copies | 7 years | | Digital |
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| EEOC Yearly Diversity Report EEOC1 | 3 years | | Digital |
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| Type of Document | Retention Period | | Format |

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|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|---------------|
| I-9s: Employment eligibility and verification | 3 years after date of hire or 1 year after termination, whichever is later | Digital |
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| Personnel files and individual staff records | 7 years | Digital |
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| Personnel files and individual records of commissioned professionals or pro-tech employees, staff and seasonal employees - terminated for cause and for persons whose commission has been denied or revoked. Chief Scout Executives' sealed personnel files. | Permanent | Digital |
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| Reorganization plans | 5 years | Digital |
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| Summer camp staff files or seasonal staff files, including letters of employment | 5 years | Digital |
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| Program If a document is potentially identified in more than one category, such as an application to attend with integrated release from liability, the document should be kept for the longest potentially applicable period. | | |
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| Boy Scouts, Cub Scouts, Learning for Life/Exploring, Leadership Support, International, Jamboree, Order of the Arrow, NESA (National Eagle Scout Association), Venturing, National Events unless otherwise specified below | 5 years | Digital |
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| Risk Acknowledgement or Release from Liability forms from program events | 10 years | Digital |
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| Talent release or photo use authorization | 10 years | Digital |
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| Advancement records | Permanent | Digital |
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| Training records | Permanent | Digital |
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| Friends of Scouting pledge forms | 7 years | Digital |
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| Type of Document | Retention Period | Format |

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| Territory transfers/council mergers | Permanent | Digital |
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| Charter applications | Permanent | Digital |
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| Event files | 5 years | Digital |
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| Properties | | |
| Blueprints, maps of facilities, construction as-built drawings, construction specifications, equipment manuals and purchase documents, and engineering reports | May be transferred with ownership or 10 years after property conveyed away | Paper or Digital |
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| Environmental reports and hazardous waste disposal records | Permanent | Digital |
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| Security, fire safety, access, postage and delivery | Current + 3 years | Digital |
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| Software Licenses | | |
| Software registrations, warranties, and license agreements | Until software removed | As provided |
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| System Backups | | |
| Magnetic tape and similar devices. Includes security, testing, and upgrades | 13 Months | Digital |
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| Tax Records | | |
| Federal and state tax: 990, 900-T, 5500, 1099, 1042, 5227, 1041-A, 1065, 941, 945, trust returns, unclaimed property returns, tax sheltered annuity reports | Permanent | Digital |
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| State and federal sales and payroll tax: payroll withholding, unemployment, garnishment and workers' compensation reports, sales tax returns, support, and Scout Shop detail reports (used during audits), annual license, charitable registrations, and corporate filings | 7 years | Digital |

Approved effective: 1/1/2019



Steven P. McGowan, General Counsel

If it is an electronic application, the data is already retained and there is no paper application to which the policy applies.

Applications contain important answers to screening questions, which may be valuable in terms of the BSA showing it is consistent in processing registration applications. Cost-effective scanning and storage make retention in digital format an efficient choice.

Paper applications should be scanned and retained in PDF format immediately after they are processed. They can be bulk-scanned into folders organized by processing date or even month or some other logical manner of organization so long as it provides the ability to narrow the search for a specific application if it is required in the future.

Any question regarding this policy may be directed to the Legal or Records Management departments.



TO: Scout Executives Group Directors
Area Directors Department Managers
Regional Directors High-Adventure Base General Managers

FROM: Steven P. McGowan
General Counsel

SUBJECT: Revised Record Retention Policy for Local and National Councils
Effective 1/1/19

NOTE: PLEASE REVIEW AND PROVIDE TO APPROPRIATE STAFF MEMBERS

Official records of the Boy Scouts of America must be retained for as long as they are in use or retention is necessary for historical reference or contractual or legal requirements. Records and documents outlined in the attached Record Retention Policy includes paper, electronic files (including email), and voicemail records, regardless of where the document is stored, including network servers, desktop or laptop computers, handheld computers, and other wireless devices with text messaging capabilities.

Most records may be retained in either paper or digital form. Councils are encouraged to consider batch scanning documents into PDF format for long-term storage. The Member Data Shared Services team at the National Service Center can also help your council manage document retention.

While this policy specifies a minimum retention period, if it appears prior to or at the expiration of the retention period that a record should be retained longer, then steps must be taken to safeguard the file and indicate when it will be appropriate to purge the record. This policy is intended to provide general parameters for the retention of records. Ambiguities and exceptions must be resolved by proper written approval and documentation.

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Prior to the destruction of any National Council records or documents, including those in the custody of local councils, destruction approval must be obtained from the department head of the originating department, the Legal Department, and the records section team leader. Destruction





approval may be accomplished by paper or digital approval and a record of the approval is to be permanently obtained in digital format. Paper records and documents containing confidential, personal, or other sensitive information shall be identified on the destruction approval form for shredding where appropriate.

Documents that may be described in multiple categories, such as Eagle Scout Award and advancement records, should be kept the longer of the applicable periods. Documents authorized to be kept in digital form may be kept in paper form until digitized or the expiration of the required retention period.

Documents subject to a litigation hold or which may relate to a pending or threatened lawsuit must be retained until the suit is resolved. If there are any questions regarding documents that may need to be retained due to a pending or threatened lawsuit, call the Legal Department.

Any questions regarding this policy may be directed to the Records Management or Legal Departments.