



PO Box 73466
Washington DC 20056-3466
202-827-5967
inbox@peacethroughaction.org
peacethroughaction.org
@peaceactusa #PeaceBeginsWithWe

RECORDKEEPING POLICY

Approved by the Board of Directors on 04172016

Amended by the Board of Directors on 10262024, 07262025

Policy Purpose

To establish the preservation, retention, maintenance, and destruction of the records of Peace Through Action® USA (the "Corporation").

Definitions

1. Interested Person—Any director, officer, employee, intern, contractor, or volunteer of the Corporation.
2. Award—Financial assistance in the form of money to the Corporation by a grant, contract, cooperative agreement, or other instrument.
3. Governing Authorities—constitutions, statutes, regulations, award terms and conditions, and unit policies.
4. Permanent—Preserved in perpetuity.
5. Record—Material, regardless of form or characteristics, made or received by the Corporation that contains information about the Corporation's incorporation status, governance, policies, plans, money, property, operations, program services, or performance.
6. Temporary—Retained for a determinable period of time less than perpetuity.
7. Unit—A department or agency of the government.

Policy

1. Peace Through Action® USA (the "Corporation") shall achieve and maintain an organization culture and practice of accountability and transparency to persons and organizations interested in the governance, management, operations, and program services of the Corporation.
2. The Corporation places a high priority on recordkeeping as one means of fulfilling its accountability and transparency objectives.
3. The Corporation shall comply with all applicable governing authorities establishing recordkeeping and record disclosure requirements of corporations and public charities. In cases of inconsistency, recordkeeping requirements of governing authorities supersede the recordkeeping requirements of the Corporation.
4. The Corporation shall retain records pertaining to any litigation, claim, or audit until such action is completed or resolved.

5. The Corporation shall retain all records pertaining to awards by units for at least three years following the date of submission of the final financial report to the unit, or for as long as the Corporation is subject to audit, investigation, or claim pertaining to an award until such action is completed or resolved.
6. The Corporation shall make records available for inspection to any public authority with jurisdiction over the Corporation and with a legal right to access and inspect the Corporation's records.
7. The Corporation shall make particular records widely available for inspection by any person with a legal right to inspect the particular records, including records pertaining to the Corporation's tax-exempt status and tax return.
8. The Corporation shall permit persons to access and review records of the Corporation that pertain uniquely to that person.
9. The chief executive officer shall establish a system for recordkeeping, to include procedures for a) classifying records as permanent or temporary, b) setting periods for records retention and retirement, c) maintaining and retaining records in a manner that is protective of the confidentiality and privacy of personal identifying information, d) storing records in a secure manner, including protection from physical damage or electronic loss, and e) storing records in a manner in which they are physically accessible to authorized users, clear and accurately labeled, and stored in a usable, open and machine readable format.
10. The Corporation shall classify the following types of records as permanent: a) records pertaining to the Corporation's incorporation, corporation registrations, and tax-exempt status determination and maintenance, b) records of the Board of Directors and committees with Board of Directors delegated powers, c) contracts and leases, d) financial statements and audits, e) payroll and benefits records, f) records pertaining to whistleblower-reported violations, g) records pertaining to allegations of discrimination, h) records pertaining to allegations of harassment, i) records pertaining to investigations, audits, and claims, j) trademark registrations; and k) historical and archival records.
11. The Corporation shall maintain and retain records necessary for a) measuring operations and programs services performance, b) monitoring its budget, c) preparing financial statements, to include an accounting of assets, liabilities, expenses, and revenues, and d) preparing information returns, taxation returns, and notices pertaining to the Corporation's incorporated status, tax exemptions, tax obligations, and grant and contract terms.
12. The Corporation instructs interested persons of the Corporation's recordkeeping policy by an orientation to the policy, notices in the organization's print and online materials, and the distribution of policy and procedures.