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AIHA Record Retention and Destruction Policy

Approved September 1998; Revised June 2017

The American Industrial Hygiene Association (hereinafter referred to as the “AIHA”) creates a wide variety of records for both internal and external uses. This Record Retention and Destruction Policy (hereinafter referred to as the “Policy”) identifies key records and describes the retention periods and responsibilities of the AIHA staff, volunteers, officers, directors, committee members, and outside advisors and consultants for retaining and periodically destroying such records.

This Policy will help ensure that the AIHA maintains essential records for tax, audit and historical purposes, while providing for the systematic destruction of documents based on government recordkeeping requirements and business needs. Retention of records that are not otherwise necessary to conduct business is both expensive and inefficient and could expose AIHA to legal challenges based on outdated or irrelevant materials.

Generally, AIHA’s policy is that documents should be retained only so long as they are (1) necessary to the current conduct of the AIHA business; (2) required to be kept by statute or government regulation; or (3) relevant to pending or foreseeable investigations or litigation. Generally, drafts of documents should be destroyed after the document is in final form.

Courts make no distinction between electronic (e.g., email) and paper documents when ordering the production of discovery. Therefore, this Policy applies to all documents and records, in whatever form, unless otherwise specified. AIHA’s records include documents or publications created by AIHA’s employees, officers, the board of directors, committees, work groups, task forces, volunteers, and third-party contractors retained by AIHA.

As a reminder, all records should be written with the expectation that they may be read by persons other than the intended recipient. Thus, all documents should be drafted in a courteous and professional manner. Although it may sound arcane, sensitive communications should only occur orally.

This Policy also provides that confidential or privileged documents remain protected from disclosure. Confidential records should be distributed only on a “need to know” or “as needed” basis. Documents with sensitive information should be secured and access or distribution limited. Communications containing legal advice should be marked “Confidential and Privileged” and clearly identify the authors or recipients as lawyers.



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Employees, officers, or directors should not redistribute documents containing privileged attorney-client information without specific authorization from the attorney.

Documents should not be retained past the designated times set forth in this Policy. In addition, all paper and electronic files should undergo periodic review by staff, at least annually, to ensure compliance with the Policy.

SUSPENSION OF THIS POLICY IN THE EVENT OF LITIGATION OR INVESTIGATION

In the event that AIHA is served with any subpoena or request for documents, any employee or other relevant person becomes aware of a government investigation or audit, or the commencement of any litigation, against or concerning AIHA, or AIHA is provided with actual or constructive notice of litigation or government investigation to which AIHA is subject, AIHA's regular document destruction practices shall be suspended with respect to potentially relevant or responsive documents and should not be resumed without the written approval of legal counsel or the AIHA Chief Executive Officer.

RECORDS RETENTION PROCEDURES

Staff: The Management Team will be responsible for the storage, retrieval, and maintenance of all hard copy, computerized records and archival material described in this Record Retention and Destruction Policy. Because schedules will be specific to the needs of each individual department/team, there may be different retention periods for similar classes of records.

Once annually, generally following the annual conference in the month of June, the AIHA Chief Executive Officer will direct the staff to purge all hard copy and computerized records that exceed their retention period. Either a schedule will be set through which individual departments, and for large departments individual teams, will have separate dates in which to accomplish this process or a single day will be devoted to such for all staff.

Board: During this same period and using similar retention schedules, the AIHA Board of Directors will be requested to purge their files as well. The Chief Executive Officer or an appointed staff person will advise the Board of Directors of this requirement. Follow-up by that individual will take place to ensure compliance. Individuals cycling off the Board will be requested to purge their files as part of the exiting process.

Other Volunteers: During this same period, the Chief Executive Officer will advise the Management Team to apprise appropriate volunteers (including members of AIHA's



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Committees and Task Forces) of the need to purge documents and communications from their files and records in compliance with the Record Retention and Destruction Policy, procedures, and schedule. Individuals ending their volunteer tours of duty will be requested to purge their files as part of the exiting process.

Annually, the AIHA Chief Executive Officer will review the Record Retention and Destruction Policy to ensure full compliance with current legal and governmental requirements.

EMAIL RETENTION GUIDELINES

Purpose: As a component of the AIHA Record Retention and Destruction Policy, these Email Retention Guidelines are intended to help employees and volunteers determine what information sent or received by email should be retained and for how long. The information covered in these guidelines includes, but is not limited to, information that is either stored or shared via electronic mail or instant messaging technologies.

EMAIL RETENTION PROCEDURES

All employees and volunteers should familiarize themselves with AIHA's Email Retention Guidelines and Procedures. Questions about the proper classification of a specific piece of information should be addressed to the appropriate staff manager or the Chief Executive Officer. Questions about these guidelines should be addressed to the Chief Executive Officer.

These Email Retention Guidelines are secondary to AIHA's Record Retention and Destruction Policy. Any email that contains information in the scope of the Policy should be treated in that manner. All AIHA email information is categorized into four main classifications with the following retention guidelines:

- Administrative Correspondence (duration of volunteer service)
- Fiscal Correspondence (duration of volunteer service)
- General Correspondence (1 year)
- Ephemeral (Short-term) Correspondence (Retain until read, destroy)

EMAIL CLASSIFICATION DEFINITIONS

Administrative Correspondence: AIHA Administrative Correspondence includes, though is not limited to, policy discussions, work place behavior, and legal issues. All email with the information sensitivity level of "Management Only" shall be treated as Administrative Correspondence.

Fiscal Correspondence: AIHA Fiscal Correspondence is all information related to revenue and expense for AIHA, including policies & procedures, financial reports, and audits.



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General Correspondence: AIHA General Correspondence covers information that relates to operational & business discussions, strategic planning, and product development.

Ephemeral (short-term) Correspondence: AIHA Ephemeral Correspondence is by far the largest category and includes personal email, routine interaction with members and customers, staff interaction, routine staff-volunteer interaction, requests for recommendations or review, updates and status reports, and non-binding vendor correspondence.

RECOVERING DELETED EMAIL VIA BACKUP MEDIA

AIHA maintains backup tapes from the email server and once a quarter a set of tapes is taken out of the rotation and moved to offsite storage. No effort will be made to remove email from the offsite backup tapes. Tapes will be maintained for a one-year period and then destroyed.

RECORD RETENTION SCHEDULE: ACCOUNTING (STAFF)

RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Accounts (charged off)	7 Years
Accounts Payable Ledgers and Schedules	7 Years
Accounts Receivable Aging Reports	7 Years
Accounts Receivable Ledgers and Schedules	7 Years
Audit Reports of Accountants	Permanent
Bank Deposit Receipts	3 Years
Bank Statements & Reconciliations	7 Years
Budgets/Business Plans (AIHA, SIGs)	3 Years
Cash Receipts Postings	7 Years
Cash Sales Slips	7 Years
Charge Slips	7 Years
Chart of Accounts	Permanent
Checks (canceled)	7 Years



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Checks (canceled payroll)	7 Years
Checks (canceled important payments, taxes, property purchase)	7 Years
Check Register	7 Years
Correspondence (accounting)	5 Years
Correspondence (credit collection)	7 Years
Depreciation Records	7 Years
Employee Expense Reports	3 Years
Employee Payroll Records (W-2, W-4, annual earnings records)	Permanent
Employee Salary History	8 Years
Expense Analyses and Expense Distribution Schedules	7 Years
Financial Statements (annual)	Permanent
Financial Statements (interim/internal)	7 Years
General Ledger	Permanent
Income Tax Returns and Worksheets	(see separate "Taxes" schedule)
Inventory Records	Permanent
Investments (sales/purchases)	Permanent
Invoices from Vendors	7 Years
Journal Entries	7 Years
Notes Receivable Ledgers and Receivables	7 Years
Payroll Journal	7 Years
Trial Balance	Permanent
Uncollectible Accounts	7 Years
Vouchers (for payment to vendors, employees, board members and others for travel and entertainment expenses)	7 Years
Voucher Register and Schedules	7 Years



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RECORD RETENTION SCHEDULE: AIHA BOARD OF DIRECTORS (STAFF)

Responsible TEAM: EXECUTIVE DEPARTMENT

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of the Board during their tenure will also be retained by the appropriate members of the staff or in official archives. In the instance of multiple Board/Officer terms, unless otherwise designated document destruction will occur at the completion of each term.

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Permanent, or as otherwise set forth in the Email Retention Guidelines above
Reports	5 Years
Minutes	Permanent

RECORD RETENTION SCHEDULE: AIHA BOARD OF DIRECTORS (VOLUNTEERS)

Responsible TEAM: EXECUTIVE DEPARTMENT

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of the Board during their tenure will also be retained by the appropriate members of the staff or in official archives. In the instance of multiple Board/Officer terms, unless otherwise designated document destruction will occur at the completion of each term.

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Duration of Board Term, or as otherwise set forth in the Email Retention Guidelines above
Reports	Duration or Board Term
Minutes	Duration of Board Term



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record retention schedule: committees and volunteer groups (staff)

responsible team: membership and professional community

<u>Type of Record</u>	<u>Retention Period</u>
Committee Annual Reports	5 Years
Committee Meeting Minutes (as available)	Permanent
Committee Membership Lists	10 Years
Committee Budgets & Business Plans	5 Years
Correspondence (general)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (committee)	5 Years, or as otherwise set forth, in the Email Retention Guidelines above

RECORD RETENTION SCHEDULE: COMMITTEES AND VOLUNTEER GROUPS (VOLUNTEERS)

Responsible TEAM: MEMBERSHIP AND PROFESSIONAL COMMUNITY, MARKETING AND COMMUNICATIONS, AND FINANCE DEPARTMENTS

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of committees and task forces during their tenure will also be retained by the appropriate members of the staff or in official archives.

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Duration of Com./VG Team, or as otherwise set forth in the Email Retention Guidelines above
Budgets	Duration of Com./VG Term
Reports	Duration of Com./VG Term
Minutes	Duration of Com./VG Term



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PUBLICATIONS COMMITTEE: Additional Retention Schedule

Manuscripts (published or accepted/unpublished) Not applicable/AIHA does not maintain

FINANCE COMMITTEE: Additional Retention Schedule

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Budgets/Business Plan	Duration of Com. Term
Correspondence (accounting)	Duration of Com. Term
Financial Statements	Duration of Com. Term
Audit Reports	Duration of Com. Term
Investment Reports	Duration of Com. Term

RECORD RETENTION SCHEDULE: CORPORATE (STAFF) RESPONSIBLE TEAM: EXECUTIVE DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Amendments	Permanent
Annual Reports	Permanent
Articles of Incorporation	Permanent
By Laws	Permanent
Correspondence	1 Year
Election Records	7 Years
Minutes (board, committees and task forces with board authority)	Permanent
Minutes (membership meetings)	Permanent
Organizational Charts	7 Years



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**RECORD RETENTION SCHEDULE: DESIGN AND
PRODUCTION (STAFF)
RESPONSIBLE TEAM: MARKETING AND COMMUNICATIONS
DEPARTMENT**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Publications Artwork	Keep on CD until used again



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**RECORD RETENTION SCHEDULE: EDUCATIONAL
PROGRAMMING (STAFF)
RESPONSIBLE TEAM: GLOBAL EDUCATION and MEETINGS
DEPARTMENTS**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Abstracts	7 Years
Advertising/Marketing (includes brochures & catalogs)	Permanent
Contracts & Agreements	7 Years, or as long as active
Evaluations/Survey Reports	5 Years
Cumulative History Reports (hotel block/registration/exhibits)	5 Years
Invoices (attendees)	7 Years
Invoices (exhibitors)	7 Years
Invoices (sponsors)	7 Years
Registration Forms & Lists	7 Years



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RECORD RETENTION SCHEDULE: GOVERNMENT RELATIONS (STAFF)

RESPONSIBLE TEAM: GOVERNMENT RELATIONS DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Contracts	5 Years, or as long as active
Correspondence (general)	3-5 Years (staff discretion), or as otherwise set forth in the Email Retention Guidelines above
Correspondence (positions)	Permanent, or as otherwise set forth in the Email Retention Guidelines above
Federal Legislation/material	2 Years after Session
Lobbying Reports and Supporting Documentation	10 Years
Position Statements/White Papers	Permanent
State Legislation/material	2 Years after Session

RECORD RETENTION SCHEDULE: INSURANCE (STAFF)

**RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION and HUMAN
RESOURCES DEPARTMENTS**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Accident/Injury Reports (settled cases)	7 Years (unless exceeded by OSHA requirements)
Insurance Claims	7 Years after claim
Insurance Policies	7 Years after expiration of policy
Safety Records	6 Years (unless exceeded by OSHA requirements)



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RECORD RETENTION SCHEDULE: JOURNAL LLC BOARD (STAFF)

Responsible TEAM: AIHA and ACGIH Chief Executive AND AIHA MARKETING AND Communications DEPARTMENTS

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of the Board during their tenure will also be retained by the appropriate members of the AIHA and ACGIH staff or in official organizational archives.

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Permanent, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (editor, Board)	5 Years, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (vendors)	5 Years, or as otherwise set forth in the Email Retention Guidelines above
Budgets	5 Years
Audit Reports	Permanent
Financial Statements	3 Years
Reports	5 Years
Minutes	Permanent
Contracts	5 Years (after expiration)
Administrative Information	3 Years

Manuscripts (published or accepted/unpublished) Not applicable/AIHA does not maintain



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RECORD RETENTION SCHEDULE: LEGAL (STAFF)
**RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION, HUMAN
RESOURCES and EXECUTIVE DEPARTMENTS**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Affidavits	10 Years
Claims and Litigation	Permanent
Contracts (employee-after termination)	7 Years
Contracts (general)	5 Years (after expiration)
Contracts (government)	4 Years (after close of project)
Contracts (sales)	4 Years (after expiration)
Copyrights	Permanent
Correspondence (legal)	Permanent
Deeds/Titles	Permanent
Leases (expired)	7 Years
Leases (in effect)	Permanent
Licenses (federal, state, local)	Permanent
Mortgages	Permanent
Notes (canceled)	10 Years
Patents	Permanent
Trademarks	Permanent
Permits (business & construction)	Permanent



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RECORD RETENTION SCHEDULE: LOCAL SECTIONS COUNCIL (STAFF)

**Responsible team: MEMBERSHIP AND PROFESSIONAL COMMUNITY
DEPARTMENT**

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of the Council during their tenure will also be retained by the appropriate members of the staff or in official archives.

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Permanent, or as otherwise set forth in the Email Retention Guidelines above
Budgets	5 Years (digital)
Local Sections' Bylaws	Permanent
Group Exemption Filing and Forms, including annual report	Permanent
Minutes	Permanent
Reports	5 Years

RECORD RETENTION SCHEDULE: LOCAL SECTIONS COUNCIL (VOLUNTEERS)

**Responsible Staff TEAM: MEMBERSHIP AND PROFESSIONAL
COMMUNITY DEPARTMENT**

Note: Many of the reports, meeting minutes, statements and correspondence generally received by members of the Council during their tenure will also be retained by the appropriate members of the staff or in official archives. Related and although local sections are separate entities, AIHA recommends that local sections pursue a similar records retention schedule to that which exists for the AIHA program manager for local sections.



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<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence (non-legal)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (legal)	Permanent
Budgets	Duration of Council Term
Minutes	Duration of Council Term
Reports	Duration of Council Term



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**RECORD RETENTION SCHEDULE: MARKETING AND
COMMUNICATIONS (STAFF)
RESPONSIBLE TEAM: MARKETING AND COMMUNICATIONS
DEPARTMENT**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Advertising	2 Years
RFPs and Responses	2 Years
Brochures	Until Superseded
Contracts	5 Years (after expiration)
Correspondence (general)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (marketing and product development)	5 Years, or as otherwise set forth in the Email Retention Guidelines above
Invoices	5 Years
Mailing & Prospect Lists	3 Years
Marketing Plans	3 Years
Marketing Studies	5 Years
Marketing Surveys	5 Years
Price Lists/Catalogs	Until Superseded



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RECORD RETENTION SCHEDULE: MEMBERSHIP (STAFF)
RESPONSIBLE TEAM: MEMBERSHIP AND PROFESSIONAL COMMUNITY
and MEMBER AND CUSTOMER RELATIONS DEPARTMENTS

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Applications (new members)	3 Years
Contracts	5 Years (after expiration)
Correspondence (general)	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Correspondence (membership)	5 Years, or as otherwise set forth in the Email Retention Guidelines above
Membership Directory	7 Years
Membership Reports (growth, acquisition, retention)	7 Years
Renewal Invoices (membership)	3 Years
Rental List Agreements	3 Years



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RECORD RETENTION SCHEDULE: PERSONNEL AND BENEFITS (STAFF)

RESPONSIBLE TEAM: HUMAN RESOURCES DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Affirmative Action	2 Years
Background Checks	5 Years
Benefits (Dental)	6 Years
Benefits (Life Insurance)	6 Years
Benefits (medical)	6 Years
Disability Records	8 Years
Employee Performance Records	4 Years after Termination
Employee Personnel Records (after termination)	4 Years
Employee Personnel Records (current)	Permanent
Employee time Records (including leave requests)	4 Years after Termination
Employment Applications, resumes, etc. (not hired)	3 Years
FMLA and USERRA and related leave records	3 Years after Termination
Form I-9 (after termination)	Later of 3 Years from DOH or 1 Year after Termination
Garnishments	7 Years (after expiration)
Government Reports	6 Years
Job Descriptions	Until Superseded
Medical or Exposure to Toxic Substances Records	30 Years after End of Employment (or as required by OSHA)
OSHA 300/300A (note: AIHA no longer covered)	5 Years after Posting
Pension/Profit-sharing Plans	Permanent
Workers Compensation Records	30 Years



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RECORD RETENTION SCHEDULE: PUBLIC RELATIONS (STAFF)

**RESPONSIBLE TEAM: MARKETING AND COMMUNICATIONS
DEPARTMENT**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Press Releases	5 Years

RECORD RETENTION SCHEDULE: PUBLICATIONS (STAFF)

**RESPONSIBLE TEAM: MARKETING AND COMMUNICATIONS
DEPARTMENT**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Administrative	3 Years
Administrative/Marketing	3 Years
RFPs and Responses	3 Years
Contracts	Permanent
Copy of Each Issue	Hard Copies 1 Year Digital Version Permanent
Correspondence	5 Years
Manuscripts (published)	Until next edition or until superseded
Manuscripts (accepted but unpublished)	Not applicable
Organizational Charts	7 Years

RECORD RETENTION SCHEDULE: PURCHASING (STAFF)

RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Contracts	5 Years (after expiration)
Service Agreements (after completion of contract)	3 Years



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RECORD RETENTION SCHEDULE: REAL ESTATE (STAFF)

RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION and EXECUTIVE DEPARTMENTS

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence	1 Year, or as otherwise set forth in the Email Retention Guidelines above
Damage Reports	7 Years
Maintenance	10 Years
Plans, Blueprints, and Drawings	Permanent
Purchase Agreements	Permanent
Register & Cost Ledger	Permanent
Sales Agreement	Permanent
Taxes	7 Years
Leases	7 Years

RECORD RETENTION SCHEDULE: TAXES (STAFF)

RESPONSIBLE TEAM: FINANCE AND ADMINISTRATION DEPARTMENT

<u>Type of Record</u>	<u>Maximum Retention Period</u>
Correspondence	7 Years
Income Tax Returns and Worksheets (AIHA)	7 Years
Income Tax Returns and Worksheets (Foundation)	7 Years
Payroll Tax Returns	7 Years
Property Tax Returns	7 Years
Sales and Use Tax Returns	7 Years
Form 1024 Exemption Application	Permanent
IRS Determination Letter	Permanent



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**RECORD RETENTION SCHEDULE: SCIENTIFIC &
TECHNICAL INITIATIVES (STAFF)
RESPONSIBLE TEAM: SCIENTIFIC & TECHNICAL INITIATIVES**

<u>Type of Record</u>	<u>Maximum Retention Period</u>
ANSI Files (as required by ANSI)	10 Years (or when standard is updated)
Task Forces (scientific-technical)	10 Years