



Responsible Department	Financial Affairs	Effective Date	07/01/2010
Responsible Person	Record Retention Committee	Prior Revision Date	08/01/2009 11/17/2010

Contents

Appendix I Definitions1

Appendix II Retention Periods.....2

Appendix I Definitions

For the purpose of this policy, “record” shall be interpreted to mean:

By law, University records are any papers, books, photographs, tapes, films, recordings, or other documentary materials, or any copies thereof, regardless of physical form or characteristics, made, produced, executed, or received by any department or office of the University or by any academic or administrative staff member in connection with the transaction of University business, and retained by that agency or its successor as evidence of its activities or functions because of the information contained therein.

University records include the data generated via automated information systems. If your office has developed a computer application to manage some particular facet of its operations, the information in that system is considered a University record, whether or not you generate any actual paper or hard copy from it. You are not, however, responsible for information systems such as the accounting information system for which your office does not bear major responsibility. Although your office may access and/or input data into the accounting system, the responsibility for the system and its contents belongs to the business services-accounting office.

Non-Records

Certain categories of materials are not considered records:

- *Stocks of printed or reproduced documents kept for supply purposes when file copies have been retained for records purposes; for example, handbooks or manuals prepared for the instruction of a particular course.*
- *Books, periodicals, newspapers, and other library and museum materials made or acquired and preserved solely for reference or exhibition purposes.*
- *Duplicate microfilm.*
- *Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes which do not represent significant basic steps in the preparation of the record document.*
- *Materials not filed as evidence for department operations that have no informational value, such as telephone call slips, letters of transmittal, routing slips, etc.*

When there is any doubt as to whether or not any document (paper or other format), record, or group of records is a University record, it should be considered an official record until determined otherwise.

Definition from University of Wisconsin-Madison web site. Used with permission of Records Officer per e-mail dated December 1, 2000.



NOTE: The adoption of this policy does not relieve or otherwise affect the pre-existing obligation of any department to maintain records relating to a matter under litigation, government audit, or investigation. All such records should be preserved until the matter to which they relate has been finally resolved and University Counsel has approved their disposition. Any questions about the application of this exception should be directed to the Office of the Vice President and General Counsel at 687-6457.

Active Records

Records needed to support the current business activity of a department, division, business support center, or institutional business office.

Business Process

A series of related activities designed to accomplish a specific objective (e.g., collecting and depositing University funds, payment of invoices, etc).

Inactive Records

Records for which the active period has passed, and which are being held for the remainder of the specified retention period.

Permanent (archival) Records

Records that have long-term or permanent value to the University, such as endowment indentures, University bylaws, deeds, continuing agreements with external parties, and other similar documents.

Retention Period

The minimum required length of time for which a department or central administrative office is responsible for the maintenance of records.

Appendix II Retention Periods

October 22, 2008

Records designated as permanent (PERM) should specify a storage location. For example, Board of Directors minutes should note “Perm, transfer to University Archives after five years.”

ACT = While active, employed, or enrolled

LIFE = Life of affected employee

PERM = Permanent

TYPE OF RECORDS	DOCUMENT	Business Owner	RETENTION PERIOD	TRANSFER TO ARCHIVES
University Information Systems	HOYANet [^]	UIS	PERM A backup will be retained permanently.	



INSTITUTIONAL AND LEGAL RECORDS	Articles of Incorporation	Secretary of the University	PERM	
	Charter	Secretary of the University	PERM	
	By-Laws	Secretary of the University	PERM	
	Minutes of Directors' Meetings	Secretary of the University	PERM	
	Minutes of Directors' Committee Meetings	Secretary of the University	PERM	
	Deeds and Titles	Risk Management	PERM	
	Attorney Opinion Letters (property)	Office of University Counsel	ACT + 4 years	
	Leases	University Architect	3 years beyond the end of the term	
	Campus Crime Reports (annual)	University Safety	4 years	Transfer to Archives at end of retention period
	Campus Crime Reports (interim)	University Safety	3 years	
	Campus Security Act/Student Right to Know Act Compliance Records	University Safety	ACT + 3 years	
	OFCCP (Office of Federal Contract Compliance Programs) Compliance Records	Each compliance office would be responsible for his/her records.	ACT + 3 years	
	Data/Statistics on Criminal Offenses	University Safety	3 years	
	Contracts	Human Resources Purchasing & Contracts Departments	3 years beyond the end of the term	
Patent and Trademark Records	University Counsel	ACT + 6 years		



APPLICATION MATERIALS FOR STUDENTS WHO ARE ACCEPTED AND METRICULATE	Acceptance Letters	Admissions/Registrar	5 years after the date of last attendance	
	Applications	Registrar	PERM	
	Entrance Exams and Placement Scores	Registrar	1 year after matriculation	
	Previous Transcripts or Test Scores	Registrar	PERM	
	Letters of Recommendation	Admissions	Until Admitted	
APPLICATION MATERIALS FOR STUDENTS WHO ARE ACCEPTED BUT DO NOT ENTER	Acceptance Letters	Admissions	1 year after application	
	Applications	Admissions	1 year after application	
	Correspondence	Admissions	1 year after application	
	Transcripts	Admissions	1 year after application	
INDIVIDUAL STUDENT RECORDS	Course Drop/Add Slips	Registrar	ACT	
	Disciplinary Files	Registrar/Dean of Students	ACT	
	Student Bio/Demo Data	Registrar	PERM	
	Academic Record – Transcript	Registrar	PERM	
	Pass/Fail Requests	Registrar	1 year	
	Registration Data Forms	Registrar	PERM	
	FERPA Requests	Registrar	Life of requested record (If requested by the student, no records are required.)	
Transcript Request Data	Registrar	PERM		



	Disciplinary or any other committee or council resulting in transcript note	Registrar	PERM	See specific policy for school
	Academic action reported on transcript	Registrar	PERM	See specific policy for school
	Career Services Records	Career Services Office	ACT + 1 year	
	Name Change Authorizations and Name Change Data	Registrar	PERM	
	Disciplinary Letters (Academic and Behavioral) to students on overseas programs.	Registrar/Office of International Pgn for Main Campus	ACT	
	Consortium grade data	Registrar	PERM	
GENERAL STUDENT RECORDS	Faculty grade data	Registrar	PERM – Retain paper copies 1 year	Retained in Banner.
	Applicant Statistics	Admissions	PERM	Transfer to Archives at end of retention period
	Catalogues, Handbooks and/or other documents containing policies governing students and student records access	Registrar	PERM	
	Statistical Reports	Registrar/Office of Institutional Research	PERM	Transfer to Archives at end of retention period
	Change of grade data	Registrar	PERM	
	Medical Student Pictures	Registrar	PERM	
FOREIGN VISITORS	Foreign Student (1-20) (J and F) Immigration Document Forms	Office of International Programs	3 years after the date of last attendance	



	Foreign Scholars (J, H, O, P, PR, etc.)	Office of International Programs	3 years after the last day of employment or immigration status	
	F-1 and M-1 Visas	Office of International Programs	1 year following report to INS	
	J-1 Visas	Office of International Programs	ACT + 3 years	
COMPLIANCE RECORDS	HIPAA Compliance Records	Each HIPAA covered entity is required to maintain their own records related to their compliance with HIPPA (i.e., CAPS, GERMS, etc. each retains own records)	6 years	
	Title IX Records	IDEAA. Athletics for NCAA purposes	ACT + 3 years	
	Title VI Records	IDEAA	ACT + 1 year	
	Rehabilitation Act Compliance Records	IDEAA	ACT + 3 years	
	SEVIS Registration Records (I-17 and DS-3036)	Office of International Programs	PERM	
	Drug Free Schools and Communities Act Compliance Records	Student Affairs	4 years	
FINANCIAL AID RECORDS	Financial Aid Transcripts	Student Financial Services	5 years	
	FAFSA/CSS Profile	Student Financial Services	10 years	
	Financial Aid Awards	Student Financial Services	ACT + 5 years	



	FISAP/Supporting Documentation	Student Financial Services	3 years	
	Lender's Name and Address	Student Financial Services	Term of entry + 10 years	
	Promissory Notes	Student Financial Services	ACT – Until loan is paid in full	
	State/Outside Grant Scholarship Programs	Student Financial Services	3 years	
	Gift-Funded GU scholarships: Gift negotiations/final agreements (including donor restrictions)	Student Financial Services	Permanent	
	Job Placement - Hiring Documents	Student Financial Services	ACT + 5 years	
	Individual Repayment History - University Loans	Student Financial Services	ACT - Until Loan is paid in full	
EMPLOYMENT APPLICATION AND EMPLOYMENT LISTINGS	Job Announcements and Advertisements	Human Resources	2 years	
	Individual Applicants Who Are Not Hired	Human Resources	Note: The University must properly dispose of records of background investigations, which includes shredding or burning them, in order to comply with the FTC's disposal requirements. See http://www.ftc.gov/opa/2005/06/disposal.htm for details. This also applies to background investigations for people who are employed by Georgetown University.	
	Employment Applications Background Investigation Results Resumes Letters of Recommendation	Human Resources	2 years 2 years 2 years 2 years	



		Individual Applicants Who Are Hired		
	Employment Applications	Medical Examinations	ACT + 5 years	
	Background Investigation Results	Letters of Recommendation	ACT + 5 years	
	Resumes	Human Resources	ACT + 5 years	
PAYROLL RECORDS General Information	Individual Employee Files Wage or Salary History	Manager HR Info Systems (Genesys)	6 years	
	Wage Rate Tables	Manager HR Info Systems	3 years	
	Cost of Living Tables	Manager HR Info Systems	1 year	
	Salary or Current Rate of Pay	Manager HR Info Systems	6 years	
	Payroll Deductions	Manager HR Info Systems	6 years	
	Time Cards or Sheets	Payroll Director	5 years	
	W-2 Form	Payroll Director	6 years	
	W-4 Form	Payroll Director	6 years	
	Garnishments	Payroll Director	ACT	
	I-9s	Human Resources (except students)	ACT + 3 years	
		Students – Student Employment Office - OSFS	ACT + 3 years.	
	Employee Reimbursements through Genesys	Payroll Director	ACT + 3 years	
	PERSONNEL FILES			
Superseded HR Policies		<i>Human Resources</i>	PERM	



	Superseded Job Descriptions	<i>Human Resources</i>	5 years	Archives after 5 years
	Expired Collective Bargaining Agreements	<i>Human Resources</i>	6 years	
	Grievance Files	Human Resources	Act + 5 years	
	Family & Medical Leave Act Documentation	Human Resources	5 years	
	<i>Faculty Files</i>			
	Correspondence	EVP or Provost's Office	ACT + 5 years	Transfer to Archives 5 years after faculty member's departure Note: The University must properly dispose of records of background investigations, which includes shredding or burning them, in order to comply with the FTC's disposal requirements.
	Course Evaluation Forms		5 years	
	Peer Review Documents	EVP or Provost's Office		
	Scholastic Evaluation		ACT + 7 years	
	Rank and Tenure Records	EVP or Provost's Office	ACT + 5 years	
	Faculty Committee		ACT + 5 years	
	Evaluation Reports	EVP or Provost's Office		
	Faculty Appointment/Promotion Applications C.V.	EVP or Provost's Office	PERM ACT + 5 years	
	Letters of Appointment, Promotion and Tenure	EVP or Provost's Office	ACT + 5 years	
		EVP or Provost's Office	ACT + 5 years	
		EVP or Provost's Office		
		EVP or Provost's Office		



	Faculty Evaluations	Provost's Office	ACT + 5 years	Transfer to Archives at end of retention period.
	Faculty Handbooks	Provost's Office	PERM	
	<i>Academic Calendars</i>	Provost's Office	PERM	
	Individual Employee Files	Human Resources		
	Employment Application or Resume		ACT + 5 years	
	Employment History		ACT + 5 years	
	Beneficiary Designation		ACT	
	Emergency Contacts		ACT + 5 years	
	Medical Records		ACT	
	Promotions		ACT + 5 years	
	Attendance Records		3 years	
	Employee Evaluations		ACT + 5 years	
	Transfers		ACT + 5 years	
	Personnel Actions		ACT + 5 years	
	Disciplinary Warnings and Actions		ACT + 5 years	
	Layoff or Termination Plans		ACT + 7 years	
EMPLOYEE MEDICAL, HEALTH AND SAFETY RECORDS	<i>Exposed Employee Medical Records</i>	Risk Management	30 years	See note below
	<i>Accident Reports</i>	Risk Management	7 years	
	<i>Employee Exposure Records</i>	Risk Management/Safety & Environmental Health	30 years	
	If an exposure results in a workers' compensation claim, Risk Services maintains the medical records associated with the incident. If the employee elects to consult with Occupational Health in the Medical Center, they would also maintain a file. Additionally, if there is environmental exposure monitoring involved, either of the health and safety functions would maintain records as required by OSHA.			



	<i>Safety Records</i>	Safety & Environmental Mgt	6 years	
	<i>Employee Medical Complaints</i>	Risk Management – work related	7 years	
	<i>Faculty and Staff Assistance</i>	Human Resources	5 years	
	<i>Employee Injury Records</i>	Risk Services	7 years	
PENSION AND BENEFITS RECORDS	Vesting	Personnel Benefits	6 years	
	Individual Employee Files	Personnel Benefits	LIFE	
	Education Assistance	Personnel Benefits	LIFE of the employee AND through the life of the beneficiary	
	Sick Leave Benefits	Personnel Benefits	LIFE	
	Retirement Benefits Accrued	Personnel Benefits	LIFE	
	Disability Records	Personnel Benefits	LIFE. If the participant is allowed to choose a “lump sum” payment, then the retention period is 6 years.	
	Actuarial Records	Personnel Benefits	6 years	
	Incentive Plans (after expiration)	Personnel Benefits	6 years	
	Pension Plan (after expiration)	Personnel Benefits	6 years	
	Retirement Plans (after expiration)	Personnel Benefits	6 years	
FEDERAL TAX RECORDS	Form 990	Tax Office	PERM	
	Form 941	Tax Office	6 years from the date of filing	
	Form 990-T	Tax Office	PERM	



	IRS Determination Letter	Tax Office	PERM	
	Form 1099	Purchasing & Contracts	6 years from the date of filing	
	Form W-9	Purchasing & Contracts	6 years from the date of filing	
	Form 1042s	Tax Office	6 years from the date of filing	
	Form D-20	Tax Office	PERM	
STATE TAX RECORDS	Sales and Use Tax Reports and Support	Tax Office	PERM for all open (un-audited) periods	
	Receipts	Tax Office	7 years	
	Accounts Payable Ledgers	Accounts Payable	7 years	
ACCOUNTS PAYABLE RECORDS	Purchase Requisitions	Purchasing & Contracts	7 years	
	ACH Payments	Accounts Payable	7 years	
	Invoices	Accounts Payable	7 years	
	Payment/Disbursement Records	Accounts Payable	7 years	
	Expense Reports	Accounts Payable	7 years	
	Insurance Payments	Accounts Payable	7 years	
	Royalty Payments	Accounts Payable	7 years	
	Petty Cash Reports	Accounts Payable	7 years	
	Procurement Card Reports	Purchasing & Contracts	7 years	
	Depreciation Schedules	General Accounting	ACT + 4 years	
PROPERTY RECORDS	Property Records/Inventory	General Accounting	ACT + 4 years	
CAPITAL PROPERTY	Equipment Inventory	General Accounting	ACT	
	Mortgage Records	General Accounting	ACT + 4 years	



	Property Improvement Records	General Accounting	ACT + 4 years	
	Sales	General Accounting	4 years	
	Purchase Requisitions	Purchasing & Contracts	4 years	
PURCHASING and CONTRACTS	Leases, agreements and other contracts	Purchasing & Contracts	3 years beyond the end of their term	
	All Personnel Service Contracts with overseas individuals who provide support for GU students studying abroad	Purchasing & Contracts	ACT + 3 years. Retained in OIP	
	ProCard Reconciliations	Individual Users or Cost Center Managers	10 years	
	Balance Sheets	General Accounting	ACT + 4 years	
FINANCIAL RECORDS	General Ledgers	General Accounting	ACT + 4 years	
	Annual Financial Reports	Financial Planning and Analysis	PERM	
	University Financial Plans (for tuition & fee schedule)	Financial Planning and Analysis	PERM	
	Account Ledgers	General Accounting	ACT + 4 years	
	Description of Accounting System	General Accounting	ACT	
	Auditor's Reports	General Accounting	ACT + 4 years	
	Departmental CSR Review and Reconciliation Log	Department Administrator	Retain in department for 7 fiscal years.	



INSTITUTIONAL PUBLICATIONS	Student Newspapers	Student Affairs	3 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Alumni Newsletters	Advancement	3 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Alumni Directories	Advancement	3 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Institutional Newspapers/Newsletters	Specific Department	3 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Student Directories	Student Affairs	5 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Employee Directories	UIS	5 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Commencement Programs	University Archivist	PERM	
	Statistical Reports (GU & IPEDS)	Registrar/Institutional Research	PERM	
	College Press Publication List	GU Press	5 years	Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed
	Office Layouts	Architect	ACT	



FACILITIES RECORDS	Zoning Permits	Facilities & Student Housing	ACT	
	Building Permits	Facilities & Student Housing	ACT + 1 year	
	Building Plans and Specifications	Facilities & Student Housing	PERM	
	Operating Permits	Facilities & Student Housing	ACT	
	Maintenance Records	Facilities & Student Housing	ACT	
	Motor Vehicle Records	Facilities & Student Housing	ACT	
	Air or Water Waste Emissions	Facilities & Student Housing. Safety & Environmental Mgt.	3 years	
	Hazardous Chemical Waste Records	Safety & Environmental Mgt.	5 years	
	Laboratory Practices	Safety & Environmental Mgt./EH&S	ACT	
	Deposition Transcripts	University Counsel/Safety & Environmental Mgt.	ACT + 4 years	
LITIGATION RECORDS	Discovery Materials	University Counsel	ACT + 4 years	
	Claims	University Counsel	ACT + 4 years	
	Court Documents and Records	University Counsel	ACT + 4 years	
	Litigation Files	University Counsel	ACT + 4 years	
	Work Papers	University Counsel	7 years	



INTERNAL AUDIT WORK PAPERS	A-133 Audits	Sponsored Accounting	PERM	
INSTITUTIONAL RESEARCH	Notice of Grant Awards	Regulatory Affairs	3 years from the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual report, as authorized by the Federal Agency. Refer to OMB Circular A-110; section 4 (e).53 (b) for exceptions, www.whitehouse.gov/omb/circulars/index.html .	
	<p>IRB and IACUC RECORDS Note: 15CFR27.115 spells out in detail the records of IRB activities that must be kept for 3 years, including proposals and correspondence www.gpoaccess.gov/cfr/index.html. Records should be kept for no less than 3 years after completion of the research with which they are associated. Awar 2.35 for IACUC and 45 CFR 46.115 (b) for IRB. A large proportion of proposals are never funded and the research is never undertaken. IRB must keep such proposals, correspondence, etc. on file for 3 years; the record that appears in the minutes, for example, is not sufficient by itself.</p>			
	Sub-recipient Audits	Sponsored Accounting	3 years from the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual report, as authorized by the Federal Agency. Refer to OMB Circular A-110; section 4 (e).53 (b) for exceptions, www.whitehouse.gov/omb/circulars/index.html .	
	Federal Contracts	Office of Sponsored Programs	3 years FAR 4.703 spells out that contractors shall make available books, records, documents, and other supporting evidence to satisfy contract negotiation, administration, and audit requirements of the contracting agencies and the Comptroller General for (1) 3 years after final payment or, for certain records, (2) the period specified in 4.705 through 4.705.3, whichever of these periods expire first	
	Disclosure Statement (DS2)	Cost Accounting	PERM	
Indirect Cost Proposal	Cost Accounting	3 years from the submission date		



<i>PERSONNEL BENEFITS Form</i>	403(b) retirement plans	Personnel Benefits	6 – 10 years* The time period is counted from the last possible event in a participant’s life	
Salary Reduction Agreement	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
Fidelity enrollment	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
Fidelity distribution	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
Vanguard enrollment	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
Vanguard distribution	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
TIAA-CREF enrollment	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
TIAA-CREF distribution	403(b) retirement plans	Personnel Benefits	6 – 10 years*	
Maximum Exclusion Allowance calculation	Georgetown University Retirement Plan (GURP)	Personnel Benefits	6 – 10 years*	
GURP beneficiary designation	GURP	Personnel Benefits	6 – 10 years*	
GURP final calculation	GURP	Personnel Benefits	6 – 10 years*	
GURP election form	Life insurance	Personnel Benefits	6 – 10 years*	
Life insurance enrollment	Life insurance	Personnel Benefits	6 – 10 years*	
Life insurance change	Long term disability	Personnel Benefits	6 – 10 years*	
Long Term Disability enrollment	Health insurance	Personnel Benefits	6 – 10 years*	
Georgetown Health Plan enrollment	Health insurance	Personnel Benefits	6 – 10 years*	
Georgetown Health Plan Student Certification	Health insurance	Personnel Benefits	6 – 10 years*	



Kaiser HMO enrollment	Health insurance	Personnel Benefits	6 – 10 years*	
Kaiser HMO change	Dental insurance	Personnel Benefits	6 – 10 years*	
Blue Cross Blue Shield enrollment	Dental insurance	Personnel Benefits	6 – 10 years*	
Blue Cross Blue Shield change	Dental insurance	Personnel Benefits	6 – 10 years*	
Blue Cross Blue Shield student certification	Dental insurance	Personnel Benefits	6 – 10 years*	
Prudential DMO enrollment	Flexible benefits	Personnel Benefits	6 – 10 years*	
Flexible benefits enrollment	Flexible benefits	Personnel Benefits	6 – 10 years*	
Flexible benefits change	Tuition Assistance Program	Personnel Benefits	6 – 10 years*	
DEVELOPMENT RECORDS	Gift Agreements	Advancement	PERM in Office of Advancement and Legal Counsel. Also scanned and stored on database	
	General Correspondence with Major Donors	Advancement	PERM in Donor Files – NOTE: Donor files may be microfilmed after the death of the donor or as the amount of the documentation gets too bulky. This is usually information that is over 15 years old.	
	Original Gift Batches	Advancement	Retention varies by gift type. See detail below	
	PNC/Lockbox.	Advancement	All documents are stored on a CD provided by PNC bank and is kept in Gift Processing for 5 years. A scanned image is attached to the donor’s record on Gambit of gifts \$250+. No original copies are kept/or received	
	Securities and Wires	Advancement	Documents are maintained in Gift Processing for 3 years then moved to off-site storage for 5 years.	



	Gift Agreements/Statements of Intent	Advancement	Documents are scanned in Gambit on the donor’s record, and a copy is maintained in Gift Processing for 3 years then moved to off-site storage for 5 years.
	PCI Online Gifts	Advancement	Documents are maintained in Gift Processing for 3 years then moved to off-site storage for 5 years.
	Phonathon Credit Cards and Pledges		Documents are maintained in Gift Processing for 3 years then moved to off-site storage for 5 years.
	Gift-in-Kind, Unreimbursed Expenses and Pre-deposited		Documents are maintained in Gift Processing for 3 years then moved to off-site storage for five years.
	Documentation for Gifts over \$10,000	Advancement	PERM in donor files Documents scanned and stored on database
	Trusts/Bequests	Advancement	PERM in Donor files and Legal Counsel