



<b>Responsible Department</b>	Financial Affairs	<b>Effective Date</b>	07/01/2010
<b>Responsible Person</b>	Record Retention Committee	<b>Prior Revision Date</b>	08/01/2009 11/17/2010 01/30/2013

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### 100.01 Purpose

*This policy seeks to:*

- *Promote compliance with federal, state, and other legal requirements for record retention*
- *Promote the efficient management, sharing, and transfer of information among authorized University staff within prescribed security standards*
- *Effectively utilize limited office space for active records and utilize low-cost, remote storage space for inactive records*
- *Dispose of records no longer needed to satisfy legal, regulatory or other requirements*
- *Ensure that no record is disposed of unless authorized*
- *Ensure that the means of destruction is appropriate for the type of record under consideration*
- *Ensure the preservation of records of permanent value*
- *Ensure that record retention policies, schedules and procedures are reviewed and modified as necessary to respond to changes in technology or regulations*

The purpose of this policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed or of no value are destroyed at the appropriate time. This policy is also intended to preserve University history.



Records management and retention policies apply to all records, regardless of format, whether they be paper, electronic, or microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), or other more traditional media. The University encourages record retention in an electronic format whenever possible. Where paper records are converted to an electronic format that captures and retains all information contained in the paper documents (e.g., PDF files), preservation of the original paper documents may not be required. Departments should consult with the Office of University Counsel before destroying original paper versions of documents that have been converted into an electronic format, to determine if there are any laws that prohibit the destruction of the paper documents.

Individuals responsible for the retention of records are also responsible for the destruction of records following the retention period. Documents should be destroyed in a manner that ensures that all sensitive or confidential material can no longer be read or interpreted. This means that paper documents should be shredded, and electronic documents should be erased or otherwise rendered unreadable (contact UIS for assistance with this process).

### **100.02 Statement**

This policy provides guidelines for retention of official University records, including payroll and related records. It applies to all University departments and offices, all University financial records and all University employees who create, receive or maintain such records in the course of University business.

This policy does not address the retention of student academic records, patient medical records, or any other area of operations outside the University's financial administration. Consult the appropriate University office for further information about those areas. The University's policy is to comply with local, state and federal laws regarding the retention and disposition of Georgetown University records.

This policy applies only to documents in departments that have primary responsibility for the specific records (retention and disposition) as defined in the documentation mission statement(s), e.g., Financial Aid, Financial Affairs, Benefits, or Human Resources. Document copies retained by other departments that do not have primary responsibility per their mission statements are not covered in this policy. Please refer to the HIPAA policy located at <http://policies.georgetown.edu/hipaa/sections/security/> for records that are covered under HIPAA.

### **100.03 Applicability**

This policy applies to all records, as defined in the "definitions" section below, generated in the course of the university's operations, including both original documents and reproductions, and paper and electronic documents. It also applies to records stored on computer and microform as well as paper records. This policy does not apply to records of individual faculty members except as such records may apply to the university's official business rather than the faculty member's research or teaching.

This policy applies ONLY to the department of record as spelled out in the Policy Statement above and does not apply to departments that have copies of documents but do not have primary responsibility for maintaining those documents, such as copies that are retained within a department and the original record is



stored centrally. Departments that have copies of documents for which they do not have primary responsibility should carefully consider whether they need to retain those documents, should destroy them when they are no longer needed, and should handle the documents in accordance with other applicable University policies, including those relating to information security.

## **100.04 Enforcement and Accountability**

### **Policy Sections**

#### **I. 100.1 Ownership of Institutional Records**

University financial records are the property of the University and do not belong to those who prepare such records. No employee has any personal or property right to financial records of the University, including those records that the employee helped develop or compile, and no employee may remove or copy such records for personal use.

#### **II. 100.2 Retention Periods, Storage and Disposition**

##### **Retention Periods**

Financial record schedules are primarily calendar-driven; that is, the retention period begins on the last day of the fiscal year that the records were created. The retention period for University tax documents generally begins on the filing date for that period. However, the retention period for tax returns, as well as for records which support tax filings, will not begin until either the due date of the filing or actual date filed, whichever is later.

##### **Record Retention Categories**

Records fall into one of the three retention categories:

1. Archival records ( permanent);
2. Non-permanent records requiring retention for legal or audit purposes; and
3. Routine administrative records.

Active records are those needed to support the current business activity of a department, division, business support center, or institutional business office. Normally, the active period for financial records ends on the last day of the fiscal year following the fiscal year in which the records were created.

##### **Storage Standards and Locations**

At the end of the active period, records must be labeled and stored for the balance of the retention period according to University guidelines and procedures.

Regardless of where inactive records are stored, the originating department is responsible for maintaining files or logs describing the contents of stored records, and for retrieving records upon official request.



### **Disposition of Records**

At the end of the appropriate retention period, inactive records, including transaction records, inactive agreements and other non- permanent records, shall be destroyed according to the applicable schedule. The disposal process and methods should preserve the confidentiality of documents through the final point of disposition. Records containing personal and confidential information must be shredded or boxed and sent to the recycle center for disposal. Non- confidential paper records may be put into recyclable containers.

If litigation is pending, threatened or anticipated, records bearing on such litigation must not be destroyed except by permission of the University's General Counsel. Similarly, documents under audit must not be destroyed.

#### **III. 100.3 Accessibility of Records**

Financial records must be easily retrievable for examination by authorized departmental and central administrators, auditors and other authorized individuals.

#### **IV. 100.4 Use of Document Imaging**

Document Imaging may be the most effective and efficient means for retaining certain types of records. However, any department that is contemplating replacing original financial documentation with images of those records must consult the Office of University Counsel prior to implementing such a system.

Departments proposing such systems must be prepared to demonstrate that the following requirements would be met:

1. Electronic records must exhibit a high degree of legibility and readability
2. Paper copies or computerized books and records must be transferred to electronic storage media in an accurate and complete manner
3. Procedures must be developed to index, store, preserve, retrieve, and reproduce all electronically stored books and records
4. Controls must be developed to ensure the integrity, accuracy, and reliability of the electronic records
5. Controls must be developed to prevent and detect the unauthorized creation, alteration, addition, deletion, or deterioration of electronically stored books and records and,
6. An inspection and quality assurance program must be developed which must include regular evaluations of the system and periodic checks of stored books and records

#### **V. 100.5 Records Related to Grants and Contracts**

Records related to grants and contracts must be retained for a period of three (3) years from the date of the submission of the final financial report to the funding agency, unless the terms of the award specifically state otherwise, or if there is a pending audit or litigation matter.

Retention periods for such records vary widely depending upon the sponsoring agency and individual contract terms. In any case where the sponsoring agency's retention period is longer than that dictated by the University policy, the longer period shall apply.

Departments and business support centers are strongly encouraged to consult the office of Sponsored Programs (Main Campus) or Sponsored Research (Medical Center) determine the appropriate



retention period for records related to specific grants or contracts. Prior to destruction, department administrators must consult the OSP or OSR to ensure that the records are not related to pending audits or litigation.

### **100.05 Administration**

The retention and disposition of the university's records pursuant to this policy is overseen by the records committee.

The records committee consists of the following people: **Kelly Blevins, the Office of University Counsel; Jett McCann and Brandon Hudson, Dahlgren Library; Lennie Carter, Chair, Financial Affairs; Lynn Conway, University Archivist; Jonalyn Ware Greene, Facilities and Student Housing; ; Deborah Bassard, Human Resources; Charles DeSantis, Benefits; Jason Ackerman, Internal Audit; Charles Pruett, Law Center; Mieke Martinez, Main Campus Finance; Cindy Chance, Provost Office; Jo Ann Grainger, Office of Advancement; Mary Glasscock, Medical Center Finance; Miriam Markowitz, Medical Center COO, and James Ward, OCE.**

**The records committee is responsible for the following:**

- a. overseeing the process of identifying and evaluating which records should be retained;
- b. publishing retention and disposition schedules to maintain compliance with local, state, and federal laws;
- c. helping the University to monitor local, state, and federal laws affecting record retention;
- d. annually reviewing the record retention and disposition policy;
- e. developing appropriate training for personnel responsible for record storage and maintenance; and
- f. monitoring compliance with the record retention and disposition program.

Each University unit or department will prepare a listing of the primary documents used and maintained by the department and will compare this list to the list referenced in the Record Retention Policy and inform the records committee of any inconsistencies. In addition, each unit or department will review annually the records and forms that it maintains to determine whether retention of each of these records and forms is appropriate and whether these records and forms are adequate for that unit or department's ongoing operational needs and record-keeping requirements.

Records can have historical value, even when no longer of immediate administrative value. If an office has any doubt if a record should be maintained, it should consult with the University Archivist, Law Center Archivist, or other appropriate authority before destroying records not covered by the Policy.

Financial records must be retained for a minimum of seven (7) years from the fiscal year of creation, unless the retention schedule specifically states otherwise, as is the case with records related to grants and contracts. It may be necessary to retain certain non-archival records for a period longer than seven (7) years if they are required to support an audit, litigation, or other matter.

Those who give final approval to financial transactions must identify, safeguard and retain the official or "record" copies of documents supporting those transactions. Therefore, department administrators who have been delegated authority for certain kinds of transactions are responsible for the original records related to those transactions. Duplicate records must be eliminated to the extent possible.

University records must be maintained in a manner that supports operational needs and internal control



directives, and must also meet federal, state and regulatory requirements. Document retention standards and systems must ensure that transactions and related authorizations are fully supported in the event of an audit, litigation, or other external action. Each unit or department will annually review this policy to determine the need for changes in the retention policy and periods that apply to documents for which it is responsible. Requests for changes in retention periods or deviations from specified retention periods should be made to, and implemented only after review by, the policy committee. The members of the committee should ensure that the departments with which they are affiliated follow these instructions.

Any destruction or disposal of documents pursuant to this policy must be suspended whenever the University reasonably anticipates litigation or is the subject of a subpoena, governmental audit, or investigation. Once the University has notice of the litigation, subpoena, governmental audit, or investigation, the University must preserve all documents and records (both hard copy and electronic) that relate to the matter. Departments must immediately notify the Office of University Counsel if they receive notice of such litigation, subpoena, audit, or investigation. University Counsel will instruct all individuals likely to have relevant documents (both paper and electronic) to preserve those documents until further notice from University Counsel. A preservation notice from University Counsel supersedes all other record retention and disposition directives, including this policy.

**100.06 Resources**

Information Security Policy: <http://policies.georgetown.edu/31707.html>

**100.07 Approval**

This policy was approved by the Records Retention Committee on June 30, 2001. The policy is reviewed and updated bi-annually by the committee.

**100.08 Review Process**

Each unit or department will bi-annually review this policy to determine the need for changes in the retention policy and periods that apply to documents for which it is responsible.