

GEORGETOWN UNIVERSITY



**FINANCIAL AFFAIRS
RECORD RETENTION POLICY**

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| Issuing Department Financial Affairs | Topic: Record Retention Policy | Policy # FA-100-07 | Last updated: January 2008 |
| New <input checked="" type="checkbox"/> | Revised August 13, 2003 July 31, 2004 October 5, 2005 September 26, 2006 January 14, 2008 | Supersedes Policy # | Effective Date : July 1, 2001 |

Presented to Core Group by Vice President and Treasurer, June 2001.

100.1 Policy University Record Retention Policy

100.2 Statement

It is the university's policy regarding the retention and disposition of Georgetown University records to comply with local, state and federal laws.

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

100.3 Purpose

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 discarded at the appropriate time. The purpose of 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), and other more traditional media. The University encourages record retention in an electronic format whenever possible. Individuals responsible for the retention of records are also responsible for the destruction of records following the retention period. Records must be destroyed by shredding or other means to ensure that all sensitive or confidential material can no longer be read or interpreted.

100.4 Administration

The records committee governs the retention and disposition of the university's records. 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."

The records committee consists of the following: Kathryn Baerwald, Legal Counsel; Lennie Carter, Chair, Financial Affairs; Ray Carter, Financial Affairs; Lynn Conway, Library; Jonalyn Ware Greene, Facilities and Student Housing; Ardoth Hassler, University Information Services; Mary Ann Mahin, Human Resources; and Beers and Cutler, Internal Audit. The Associate Vice President of Administrative Services within Financial Affairs or other designated officer shall serve as the committee chair.

The records committee is authorized to perform the following functions:

- a. identifies and evaluates which records should be retained;
- b. publishes or reference retention and disposition schedules to maintain compliance with local, state, and federal laws;
- c. monitors local, state, and federal laws affecting record retention;
- d. annually reviews the record retention and disposition policy;
- e. develop a training program for personnel responsible for record storage and maintenance; and
- f. monitors all departments for compliance with the record retention and disposition program.

Each department will prepare a listing of major documents used and maintained by the department and will compare these documents to the documents listed or referenced in the Record Retention Policy. In addition, each department will review annually its records and forms to determine whether retention of these records and forms is adequate and appropriate for each department's 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, that individual should be directed to the University Archivist, Law Center Archivist, or other appropriate authority before destroying records not covered by the Policy.

Each department will annually review the policy to determine the need for changes in the retention policy and periods. Requests for changes in retention periods or deviations from specified retention periods should be made to and implemented only after review of the policy committee. The members of the committee ensure that the departments with which they are affiliated follow these instructions.

In the event of a governmental audit, investigation, or pending litigation, record disposition may be suspended at the direction of the individual that oversight of the records within the department. In addition, the university counsel should be informed upon notification of any such audit, investigation or litigation.

This policy applies ONLY to the department of record as spelled out in the Policy Statement above and does not apply to copies of documents that do not have primary responsibility, such as records that are retained within a department and the original record is stored centrally.

100.5 Applicability

This policy applies to all records generated in the course of the university's operation, including both original documents and reproductions. 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.

100.6 Definition

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.

—Convenience copies of reports, memoranda, etc. for which your office was not the originator or the office of record, and which have not been annotated by your office.

—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.

100.7. Retention Periods

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 | RETENTION PERIOD | TRANSFER TO ARCHIVES |
|---------------------------------|---|---------------------------------------|---|
| INSTITUTIONAL AND LEGAL RECORDS | Articles of Incorporation | PERM | |
| | Charter | PERM | |
| | By-Laws | PERM | |
| | Minutes of Directors' Meetings | PERM | |
| | Minutes of Directors' Committee Meetings | PERM | |
| | Licenses | ACT | |
| | Expired Licenses | 6 years | |
| | Deeds and Titles | PERM | |
| | Attorney Opinion Letters (property) | ACT + 4 years | |
| | Leases | ACT + 6 years | |
| | Policy Statements | 10 years | Transfer to Archives at end of retention period |
| | Campus Crime Reports (annual) | 4 years | Transfer to Archives at end of retention period |
| | Campus Crime Reports (interim) | 3 years | |
| | Campus Security Act/Student Right to Know Act Compliance Records | ACT + 3 years | |
| | OFCCP (Office of Federal Contract Compliance Programs) Compliance Records | ACT + 3 years | |
| | Data/Statistics on Criminal Offenses | 3 years | |
| Contracts | ACT + 4 years | | |
| Patent and Trademark Records | ACT + 6 years | | |
| APPLICATION MATERIALS FOR | Acceptance Letters | 5 years after date of last attendance | |

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| STUDENTS WHO ENTER | Applications | 5 years after date of last attendance | |
| | Correspondence | 5 years after date of last attendance | |
| | Entrance Exams and Placement Scores | 5 years after date of last attendance | |
| | Letters of Recommendation | Until Admitted | |
| APPLICATION MATERIALS FOR STUDENTS WHO ARE ACCEPTED BUT DO NOT ENTER | Acceptance Letters | 1 year after application term | |
| | Applications | 1 year after application term | |
| | Correspondence | 1 year after application term | |
| | Transcripts | 1 year after application term | |
| INDIVIDUAL STUDENT RECORDS | Course Drop/Add Slips | 1 year | |
| | Disciplinary Files | ACT | |
| | Pass/Fail Requests | 1 year | |
| | Class Schedules | 1 year after date of last attendance | |
| | Registration Forms | 1 year | |
| | FERPA Requests | Life of requested record (If requested by the student, no records are required.) | |
| | Transcript Requests | 1 year | |
| | Academic Records | PERM | |
| | Application for Graduation | 1 year after date of last attendance | |
| | Advanced Placement | 5 years after date of last attendance | |
| | Date of Graduation and Degree Award | PERM | |
| | Career Services Records | ACT + 1 year | |
| | Degree Audit Records | 5 years after date of last attendance | |
| | Transfer Credit Evaluations | 5 years after date of last attendance | |
| | Personal Data Forms | 1 year after date of last attendance | |
| | Name Change Authorizations | 5 years after date of last attendance | |
| | Disciplinary Letters (Academic and Behavioral) to students on overseas programs. | ACT | |
| Tuition and Fee Charges | 5 years after date of last attendance | | |

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| GENERAL STUDENT RECORDS. | Grade Statistics | 10 years | Transfer to Archives at end of retention period |
| | Applicant Statistics | 5 years | Transfer to Archives at end of retention period |
| | Enrollment Statistics | 10 years | Transfer to Archives at end of retention period |
| | Racial/Ethnic Statistics | 3 years | Transfer to Archives at end of retention period |
| | Medical Student Pictures | PERM | |
| | Student Handbooks | PERM | |
| | Tuition Deferment Forms | 5 years | |
| | Loan Disbursement Forms (If applicable to division) | 5 years | |
| | Degree Statistics | 10 years | Transfer to Archives at end of retention period |
| FOREIGN VISITORS | Foreign Student (1-20) (J and F) Immigration Document Forms | 3 years after the date of last attendance | |
| | Foreign Scholars (J, H, O, P, PR, etc.) | 3 years after the last day of employment or immigration status | |
| | F-1 and M-1 Visas | 1 year following report to INS | |
| | J-1 Visas | ACT + 3 years | |
| COMPLIANCE RECORDS | HIPAA Compliance Records | 6 years | |
| | Title IX Records | ACT + 3 years | |
| | Title VI Records | ACT + 1 year | |
| | Rehabilitation Act Compliance Records | ACT + 3 years | |
| | SEVIS Registration Records (I-17 and DS-3036) | PERM | |
| | Drug Free Schools and Communities Act Compliance Records | 4 years | |
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| FINANCIAL AID RECORDS | Financial Aid Transcripts | 5 years | |
| | FAFSA/CSS Profile | 10 years | |
| | Financial Aid Awards | ACT + 5 years | |
| | FISAP/Supporting Documentation | 3 years | |
| | Lender's Name and Address | Term of entry + 10 years | |

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| | Promissory Notes | ACT – Until loan is paid in full | |
| | State/Outside Grant Scholarship Programs | 3 years | |
| | Gift-Funded GU scholarships: Gift negotiations/final agreements (including donor restrictions) | Permanent | |
| | I-9s | 7 years | |
| | Job Placement - Hiring Documents | ACT + 5 years | |
| | Individual Repayment History - University Loans | ACT - Until Loan is paid in full | Peer institutions retain for 3-5 years after a loan is repaid, assigned, or cancelled, whichever is longer |
| EMPLOYMENT APPLICATION AND EMPLOYMENT LISTINGS | Job Announcements and Advertisements | 2 years | |
| | Individual Applicants Who Are Not Hired Employment Applications Background Investigation Results 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/dissposal.htm for details. This also applies to background investigations for people who are employed by Georgetown University. Resumes Letters of Recommendation | 2 years 2 years 2 years 2 years | |
| | Individual Applicants Who Are Hired Employment Applications Background Investigation Results Resumes Medical Examinations Letters of Recommendation | ACT + 5 years ACT + 5 years ACT + 5 years ACT + 5 years ACT + 5 years | |
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| PAYROLL RECORDS General Information | Individual Employee Files | 6 years | |
| | Wage or Salary History | | |
| | Wage Rate Tables | 3 years | |
| | Cost of Living Tables | 1 year | |
| | Salary or Current Rate of Pay | 6 years | |
| | Payroll Deductions | 6 years | |
| | Time Cards or Sheets | 5 years | |
| | W-2 Form | 6 years | |
| | W-4 Form | 6 years | |
| | Garnishments | ACT | |
| | I-9s | ACT + 3 years | |
| Employee Reimbursements through Genesys | ACT + 3 years | | |
| PERSONNEL FILES | General Files | | Transfer 2 copies of each faculty & staff manual, together with any relevant revisions and amendments to Archives after 5 years |
| | IPEDS Reports | 3 years | |
| | Superseded Employee Manuals | PERM | |
| | Superseded Job Descriptions | 5 years | |
| | Expired Collective Bargaining Agreements | 6 years | |
| | Faculty Committee Evaluation Reports | ACT + 2 years | |
| | Grievance Files | Act + 5 years | |
| | Family & Medical Leave Act Compliance Records | 5 years 3 years | |

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| | <p>Faculty Files</p> <p>Correspondence</p> <p>Course Evaluation Forms</p> <p>Peer Review Documents</p> <p>Scholastic Evaluation</p> <p>Rank and Tenure Records</p> <p>Faculty Committee Evaluation Reports</p> <p>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/di_sposal.htm for details.</p> <p>Faculty Appointment/Promotion Applications</p> <p>C.V.</p> <p>Letters of Appointment, Promotion and Tenure</p> <p>Faculty Evaluations</p> <p>Faculty Handbooks</p> <p>Academic Calendars</p> | <p>ACT + 5 years</p> <p>5 years</p> <p>ACT + 7 years</p> <p>ACT + 5 years</p> <p>ACT + 5 years</p> <p>PERM</p> <p>ACT + 5 years</p> <p>ACT + 5 years</p> <p>ACT + 5 years</p> <p>PERM</p> <p>PERM</p> | <p>Transfer to Archives 5 years after faculty member's departure</p> <p>Transfer to Archives at end of retention period</p> <p>Transfer to Archives at end of retention period</p> |
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| | Individual Employee Files Employment Application or Resume Employment History Beneficiary Designation Emergency Contacts Medical Records Promotions Attendance Records Employee Evaluations Transfers Personnel Actions Disciplinary Warnings and Actions Layoff or Termination | ACT + 5 years ACT + 5 years ACT ACT + 5 years ACT ACT + 5 years 3 years ACT + 5 years ACT + 5 years ACT + 5 years ACT + 5 years ACT + 7 years | |
| EMPLOYEE MEDICAL, HEALTH AND SAFETY RECORDS | Exposed Employee Medical Records | 30 years | |
| | Accident Reports | 6 years | |
| | Employee Exposure Records | 30 years | |
| | Safety Records | 6 years | |
| | Employee Medical Complaints | 6 years | |
| | Faculty and Staff Assistance | 5 years | |
| | Employee Injury Records | 6 years | |
| PENSION AND BENEFITS RECORDS | Vesting | 6 years | |
| | Individual Employee Files | LIFE | |
| | Education Assistance | LIFE of the employee AND through the life of the beneficiary | |
| | Sick Leave Benefits | LIFE | |
| | Retirement Benefits Accrued | LIFE | |
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| | Disability Records | LIFE. If the participant is allowed to choose a “lump sum” payment, then the retention period is 6 years. | |
| | Actuarial Records | 6 years | |
| | Incentive Plans (after expiration) | 6 years | |
| | Pension Plan (after expiration) | 6 years | |
| Retirement Plans (after expiration) | 6 years | | |
| FEDERAL TAX RECORDS | Form 941 | 6 years from the date of filing | |
| | Form 990 | PERM | |
| | Form 990-T | PERM | |
| | IRS Determination Letter | PERM | |
| | Form 1099s | 6 years from the date of filing | |

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| | Form W-9 | 6 years from the date of filing | |
| | Form 1042s | 6 years from the date of filing | |
| STATE TAX RECORDS | Form D-20 | PERM | |
| | Sales and Use Tax Reports and Support | PERM for all open (un-audited) periods | |
| ACCOUNTS RECEIVABLE RECORDS | Receipts | 7 years | |
| | Accounts Receivable | 7 years | |
| | Accounts Receivable Ledgers | 7 years | |
| | Uncollected Amounts | 7 years | |
| | Collection Records | ACT | |
| ACCOUNTS PAYABLE RECORDS | Accounts Payable Ledgers | 7 years | |
| | Purchase Requisitions (Purchasing) | 7 years | |
| | Invoices | 7 years | |
| | Payment/Disbursement Records | 7 years | |
| | Expense Reports | 7 years | |
| | Insurance Payments | 7 years | |
| | Royalty Payments | 7 years | |
| | Form 1099s | 7 years | |
| | Petty Cash Reports | 7 years | |
| Procurement Card Reports | 7 years | | |
| PROPERTY RECORDS CAPITAL PROPERTY | Depreciation Schedules | ACT + 4 years | |
| | Property Records/Inventory | ACT + 4 years | |
| | Equipment Inventory | ACT | |
| | Mortgage Records | ACT + 4 years | |
| | Property Improvement Records | ACT + 4 years | |
| | Sales | 4 years | |
| PURCHASING /CONTRACTS CONTRACTS | Requisitions | 4 years | |
| | Leases, agreements and other contracts | 3 years beyond the end of their term | |
| | All Personnel Service Contracts with overseas individuals who provide support for GU students studying abroad | ACT + 3 years. Retained in OIP | |
| | ProCard Reconciliations | 10 years | |
| FINANCIAL RECORDS | Balance Sheets | ACT + 4 years | |
| | General Ledgers | ACT + 4 years | |
| | Account Ledgers | ACT + 4 years | |
| | Description of Accounting System | ACT | |
| | Auditor's Reports | ACT + 4 years | |
| | Departmental CSR Review and Reconciliation Log | Retain in department for two fiscal years. | |

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| INSTITUTIONAL PUBLICATIONS | Bulletins and Course Catalogs | 10 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Student Newspapers | 3 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Alumni Newsletters | 3 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Alumni Directories | 3 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Institutional Newspapers/Newsletters | 3 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Student Directories | 5 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | Employee Directories | 5 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| | College Press Publication List | 5 years | Transfer 2 copies to Archives at end of retention period. Other copies then can be destroyed |
| FACILITIES RECORDS | Office Layouts | ACT | |
| | Zoning Permits | ACT | |
| | Building Permits | ACT + 1 year | |
| | Building Plans and Specifications | PERM | |
| | Operating Permits | ACT | |
| | Maintenance Records | ACT | |
| | Motor Vehicle Records | ACT | |

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| | Air or Water Waste Emissions | 3 years | |
| | Hazardous Chemical Waste Records | 5 years | |
| | Laboratory Practices | ACT | |
| LITIGATION RECORDS | Deposition Transcripts | ACT + 4 years | |
| | Discovery Materials | ACT + 4 years | |
| | Claims | ACT + 4 years | |
| | Court Documents and Records | ACT + 4 years | |
| | Litigation Files | ACT + 4 years | |
| INTERNAL AUDIT WORK PAPERS (Beers and Cutler) | Work Papers | 7 years | |
| INSTITUTIONAL RESEARCH IRB 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 . 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. | A-133 Audits | PERM | |
| | Notice of Grant Awards | 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 . | |
| | Sub-recipient Audits | 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 | 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) | PERM | |

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| | Indirect Cost Proposal | 3 years from the submission date | |
| PERSONNEL BENEFITS Form | Benefit | Time Period | |
| Salary Reduction Agreement | 403(b) retirement plans | 6 – 10 years* According to the legal advisor to the Georgetown University Faculty and Staff Benefits Office, this is a safe range for all benefits forms. The time period is counted from the last possible event in a participant's life, related to the Georgetown University benefit specified (e.g., for life insurance, 6-10 years from the payment of the death benefit or from the termination of the policy, whichever is applicable), www.acgnet.gov/far/ . | |
| Fidelity enrollment | 403(b) retirement plans | 6 – 10 years* | |
| Fidelity distribution | 403(b) retirement plans | 6 – 10 years* | |
| Vanguard enrollment | 403(b) retirement plans | 6 – 10 years* | |
| Vanguard distribution | 403(b) retirement plans | 6 – 10 years* | |
| TIAA-CREF enrollment | 403(b) retirement plans | 6 – 10 years* | |
| TIAA-CREF distribution | 403(b) retirement plans | 6 – 10 years* | |
| Maximum Exclusion Allowance calculation | 403(b) retirement plans | 6 – 10 years* | |
| GURP beneficiary designation | Georgetown University Retirement Plan (GURP) | 6 – 10 years* | |
| GURP final calculation | GURP | 6 – 10 years* | |
| GURP election form | GURP | 6 – 10 years* | |
| Life insurance enrollment | Life insurance | 6 – 10 years* | |
| Life insurance change | Life insurance | 6 – 10 years* | |
| Long Term Disability enrollment | Long term disability | 6 – 10 years* | |
| Georgetown Health Plan enrollment | Health insurance | 6 – 10 years* | |
| Georgetown Health Plan Student Certification | Health insurance | 6 – 10 years* | |

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| Kaiser HMO enrollment | Health insurance | 6 – 10 years* | |
| Kaiser HMO change | Health insurance | 6 – 10 years* | |
| Blue Cross Blue Shield enrollment | Dental insurance | 6 – 10 years* | |
| Blue Cross Blue Shield change | Dental insurance | 6 – 10 years* | |
| Blue Cross Blue Shield student certification | Dental insurance | 6 – 10 years* | |
| Prudential DMO enrollment | Dental insurance | 6 – 10 years* | |
| Flexible benefits enrollment | Flexible benefits | 6 – 10 years* | |
| Flexible benefits change | Flexible benefits | 6 – 10 years* | |
| Tuition Application | Tuition Assistance Program | 6 – 10 years* | |
| DEVELOPMENT RECORDS | Gift Agreements | PERM in Office of Advancement and Legal Counsel. Also scanned and stored on database | |
| | General Correspondence with Major Donors | 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 | Maintained in Gift Accounting for 3 years then moved to off site storage | |
| | Documentation for Gifts over \$10,000 | PERM in donor files Documents scanned and stored on database | |
| | Trusts/Bequests | PERM in Donor files and Legal Counsel | |

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 687-5417.

Resources/Related Policies:

Information Security Policy: <http://www.georgetown.edu/policy/technology/security.htm>

Approval:

This policy was approved by the Records Retention Committee on June 30, 2001.

The following representatives reviewed and revised, as necessary, the most recent policy with his/her respective executive/senior management:

Kathryn Baerwald, Legal Counsel – Jane Genster

Jett McCann and Laurie Silver – Howard Federoff

Lennie Carter, Chair, Financial Affairs – Christopher Augostini

Raymond Carter, Financial Affairs – Christopher Augostini

Lynn Conway, University Archivist – Mark Jacobs

Jonalyn Ware Greene, Facilities and Student Housing – Karen Frank

Ardoth Hassler, University Information Systems – David Lambert

David Achenbach, Human Resources – Mary Anne Mahin

Charles DeSantis, Benefits – Spiros Dimolitsas

Beers & Cutler, Internal Audit – Spiros Dimolitsas, Jane Genster, Christopher Augostini

Linda Davidson, Law Center Financial Affairs - T. Alexander Aleinikoff

Mieke Martinez, Main Campus Finance Office – Darryl Christmon

Marcia Mintz, Provost – James J. O'Donnell

Jo Ann Grainger, Office of Advancement - James Langley

Kathy Byington, Medical Center Finance Office – Howard Federoff

Jeanne Walther, Medical Center Dean's Office – Howard Federoff