

GEORGETOWN UNIVERSITY



FINANCIAL AFFAIRS RECORD RETENTION POLICY

Issuing Department Financial Affairs	Topic: Record Retention and Disposition Policy	Policy # FA-100-09	Last updated: October 22, 2008
New ✓	<u>Revised</u> August 13, 2003 July 31, 2004 October 5, 2005 September 26, 2006 January 14, 2008 October 22, 2008 August 2009	Supersedes Policy #	Effective Date : July 1, 2001

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

100.1 Policy University Record Retention and Disposition Policy

100.2 Statement

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.

100.3 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 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).

100.4 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, Legal Counsel; Jett McCann and Brandon Hudson, Dahlgren Library; Lennie Carter, Chair, Financial Affairs; Raymond Carter, Financial Affairs; Lynn Conway, University Archivist; Jonalyn Ware Greene, Facilities and Student Housing; Heidi Wachs, University Information Systems; David Achenbach, Human Resources; Charles DeSantis, Benefits; Jason Ackerman, Internal Audit; Linda Davidson, Law Center; Charles Pruitt, Law Center Financial Aid; Mieke Martinez, Main Campus Finance Office; Marcia Mintz, Provost Office; Jo Ann Grainger, Office of Advancement; David Rubenstein, Medical Center Finance; Jeanne Walther, Medical Center Dean's Office; James Ward, OCE; John Q. Pierce, Registrar.

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.

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.

100.5 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.

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.

—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.

Resources/Related Policies:

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

Approval:

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