

**APPENDIX A**

**Retention Periods – FA100-09A**

**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

<b>TYPE OF RECORDS</b>	<b>DOCUMENT</b>	<b>Data Steward</b>	<b>RETENTION PERIOD</b>	<b>TRANSFER TO ARCHIVES</b>
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	General Accounting Office	PERM	
	Attorney Opinion Letters (property)	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 APPLY	Acceptance Letters	Admissions/Registrar	5 years after the date of last attendance	
	Applications	Registrar	PERM	
	Entrance Exams and Placement Scores	Registrar	PERM	
	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 term	
	Applications	Admissions	1 year after application term	
	Correspondence	Admissions	1 year after application term	
	Transcripts	Admissions	1 year after application term	

INDIVIDUAL STUDENT RECORDS	Course Drop/Add Slips	Registrar	PERM	
	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
	Transcript	Registrar	PERM	
	Career Services Records	Career Services Office	ACT + 1 year	
	Name Change Authorizations	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	
	Name change data	Registrar	PERM	
GENERAL STUDENT RECORDS	Faculty grade data	Registrar	PERM	
	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	
	I-9s	Student Financial Services	7 years	
	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	Note from Internal Audit: 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	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 <a href="http://www.ftc.gov/opa/2005/06/disposal.htm">http://www.ftc.gov/opa/2005/06/disposal.htm</a> 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	
<b>Individual Applicants Who Are Hired</b>				
	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	ACT + 3 years	
Employee Reimbursements through Genesys	Payroll Director	ACT + 3 years		
PERSONNEL FILES	IPEDS Reports	Human Resources	3 years	Transfer 2 copies of each faculty & staff manual, together with any relevant revisions and amendments to Archives after 5 years
	Superseded Employee Manuals	Human Resources	PERM	
	Superseded Job Descriptions	Human Resources	5 years	
	Expired Collective Bargaining Agreements	Human Resources	6 years	
	Faculty Committee Evaluation Reports	Human Resources	ACT + 2 years	
	Grievance Files	Human Resources	Act + 5 years	
	Family & Medical Leave Act	Human Resources	5 years	
	Compliance Records	Human Resources	3 years	

	<b>Faculty Files</b>  Correspondence  Course Evaluation Forms Peer Review Documents Scholastic Evaluation Rank and Tenure Records Faculty Committee Evaluation Reports Faculty Appointment/Promotion Applications C.V. Letters of Appointment, Promotion and Tenure	Provost's Office  Provost's Office Provost's Office Provost's Office Secretary of the University Provost's Office  Provost's Office Provost's Office Provost's Office	ACT + 5 years  5 years ACT + 7 years ACT + 5 years ACT + 5 years PERM  ACT + 5 years ACT + 5 years 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. See for details.
	Faculty Evaluations Faculty Handbooks Academic Calendars	Provost's Office Provost's Office Provost's Office	ACT + 5 years PERM PERM	Transfer to Archives at end of retention period.
	<b>Individual Employee Files</b> 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 Plans	Human Resources	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	Risk Services	30 years	See note below
	Accident Reports	Risk Services	6 years	
	Employee Exposure Records	Risk Services/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 .			

	Safety Records	Safety & Environmental Mgt	6 years	
	Employee Medical Complaints	Risk Services – work related	6 years	
	Faculty and Staff Assistance	Human Resources	5 years	
	Employee Injury Records	Risk Services	6 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	
	Form 941	Tax Office	6 years from the date of filing	
FEDERAL TAX RECORDS	Form 990	Tax Office	PERM	
	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 CAPITAL PROPERTY	Property Records/Inventory	General Accounting	ACT + 4 years	
	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 /CONTRACTS 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	Budget Office	PERM	
	University Financial Plans (for tuition & fee schedule)	Budget Office	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 two 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, <a href="http://www.whitehouse.gov/omb/circulars/index.html">www.whitehouse.gov/omb/circulars/index.html</a> .	
	<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 <a href="http://www.gpoaccess.gov/cfr/index.html">www.gpoaccess.gov/cfr/index.html</a>. 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, <a href="http://www.whitehouse.gov/omb/circulars/index.html">www.whitehouse.gov/omb/circulars/index.html</a> .
	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
<b>PERSONNEL BENEFITS Form</b>	403(b) retirement plans	Personnel Benefits	<b>6 – 10 years*</b> 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), <a href="http://www.acgnet.gov/far/">www.acgnet.gov/far/</a> .
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*	
Tuition Application	Gift Agreements	Advancement	PERM in Office of Advancement and Legal Counsel. Also scanned and stored on database	
DEVELOPMENT RECORDS	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	Maintained in Gift Accounting for 3 years then moved to off site storage	
	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	
	HoyaNet	UIS	PERM	A backup will be retained permanently.