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Record Retention Policy

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Applies to: (examples; Faculty, Staff, Students, etc)

Faculty , Staff

Policy Overview:

Issued: 11-23-2015

Next Review Date: 09-21-2024

Frequency of Review: Annually

The policy establishes responsibility for oversight of Records retention administration and establishes procedures and timelines for retaining, archiving, and destroying Records.

Applies to any University staff or faculty member responsible for the maintenance of records in any format, as well as all University of Health Sciences and Pharmacy in St. Louis faculty and staff members who create, store, or use University records in any format.

Definitions:

Active Record: An original University Record currently used by the office, department or other areas of the University that generated it. Active Records remain active for varying numbers of years, depending on the purpose for which they were created and regulatory requirements. Active Records include Records in all formats including, but not limited to: paper, micro fiche, digitized or scanned documents, electronic documents, etc.

Archival Record: An original University Record that has **permanent or historic value**, is inactive, and is not required to be retained in the office in which it originated or was received. Archival Records are retained and preserved indefinitely in the University Archives. The University's Records Administrator will make all final decisions concerning whether Records will be preserved in the University Archives.

College Record: The original or official copy of any record/document, including Electronic Records, in any format. Formats include but are not limited to: paper, micro fiche, and electronic. The Records Administrator or designee will make the final determination concerning the Official Repository for University Records and the Official Repository for these records are identified in the Record Retention Table. There is no need for offices and departments that are not the Official Repository for a University Record to retain copies of those records.

Electronic Record: A University Record kept in a non-tangible electronic format. Electronic Records include, but are not limited to: word processor documents, spreadsheets, databases, HTML documents, scanned or imaged documents, and any other type of file warehoused online, on a mainframe, on a computer hard drive, or on any external storage medium (including disks and thumb drives). The same retention standards that apply to tangible University Records also apply to Electronic Records, and the retention periods outlined in the Record Retention Table apply equally to University Records in all formats.

Inactive Record: An original University Record that is not an Active Record, but still must be maintained pursuant to the Record Retention Table set forth below. Inactive University Records are typically maintained at the University's preferred Offsite Storage vendor or at other locations on campus; however, Inactive University Records of historical significance are maintained by the University Archives as directed by the Records Administrator or its designee(s).

Microfiche: A type of record format consisting of a flat sheet of microfilm, typically used for the purpose of maximizing space efficiency. University Records kept on fiche are bound by the same standards and retention periods as Records kept in paper or electronic formats.

Official Repository: The office or department designated as having responsibility for retention and timely destruction of particular types of official University Records. The University's Records Administrator, or designee(s), will make the final determination concerning the Official Repository for University Records. For example: The Payroll Office is the Official Repository for annual employee payroll Records. There is no need for offices and departments that are not the Official Repository for a University Record to retain copies of those Records.

Offsite Storage: University Records that are in any format and are no longer needed may be stored with the University's preferred vendor for Offsite Storage. The Offsite Storage vendor provides a fee based service for picking up and maintaining Inactive Records, and also delivering those Records if they are needed again on campus. See the Procedures section of this policy for instructions on how to store records at Offsite Storage.

Personal Information: Records that include an individual's name together with that individual's Social Security Number; driver's license number or Missouri state identification card number; financial account number, or credit or debit card number, with or without

any required security code, access code, personal identification number or password that would permit access to an individual's financial account; or biometric indicator. Personal Information is highly sensitive, and must be safeguarded and secured at all times.

Records Administrator: The Records Administrator shall be appointed by the President and shall be initially the Assistant Vice President of College Services/Chief Compliance Officer. In consultation with the appropriate President's Staff Member(s), the Records Administrator may designate certain policy implementation functions to other offices.

Records Committee: The University's Records Administrator shall convene a Records Committee to develop procedures for the implementation of this Policy and to help ensure compliance. The Records Committee shall include representatives from the Office of the President, Information Technology Department, Business Office, College of Arts & Sciences, St. Louis College of Pharmacy, Human Resources, Marketing & Enrollment Services Unit, General Counsel, and any other office or department as the Records Administrator, in consultation with the President, deems appropriate, including representatives from the faculty.

Details:

University of Health Sciences and Pharmacy in St. Louis requires that University records be retained for specific periods of time, and has designated official repositories for their maintenance. These records must be managed according to procedures that are outlined in this document.

University of Health Sciences and Pharmacy in St. Louis is committed to effective records retention to preserve its history, ensure that critical records are available to meet business needs, comply with legal requirements, protect the privacy of constituents, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed.

The University Records Administrator is responsible for the implementation of this Policy across all departments and units that maintain University Records in any format. The University Records Administrator shall oversee, with the assistance of the Records Committee, the implementation of this Policy, including developing procedures concerning the review, oversight, and governance of this Policy, and any necessary training. Each unit manager or department head is responsible for implementing this Policy within his or her unit or department consistent with the procedures developed by the Records Administrator and the Records Committee.

Procedures:

In consultation with and under the direction of the Records Administrator or designee(s), each unit manager or department head, or designee(s), must:

- Determine the appropriate format for University Records under their area of responsibility;
- Implement the unit's and/or office's record management practices;
- Ensure that record management practices are consistent with this policy;
- Educate staff within the administrative unit on sound records management practices;
- Preserve Inactive University Records of historic value, and transfer those Records to the University Archives;
- Ensure that access to confidential files and documents or electronic media that contain Personal Information is restricted in accordance with all University policies and federal regulations. Long term restrictions on access to selected Archival Records should be noted at the time of their transfer to the University Archives; and
- Destroy Inactive University Records that have no archival value upon passage of the applicable retention period.

When the prescribed retention period (see the Record Retention Table) for University Records has passed, the unit's administrative manager should ensure that the Records are properly disposed of unless the Records are of historic value to the University. The administrative manager should consult the Records Administrator to designate those Records that are archival.

Inactive University Records

If you have determined that Active Records are no longer needed for business reasons but the applicable retention period has not yet expired, the Inactive University Records may be transferred to one of the University's preferred Offsite Storage vendors. Contact the Records Administrator or its designee(s) to:

1. Review Records to be sent to Offsite Storage.
2. Request storage boxes (1 full file drawer = 2 boxes).
3. Request a transfer form from the University's preferred Offsite Storage vendor.
4. Schedule a time for boxes to be picked up.

Archival Records

If you, in consultation with the Records Administrator or its designee(s), have determined that you are in possession of Archival Records and the applicable retention period has expired, please forward those Records to the University Archives.

Non-Archival Records

If you have determined that Active Records are not Archival Records and the applicable retention period has expired, you should destroy those Records in one of the following ways:

1. Recycle non-confidential paper Records that do not contain Personal Information.
2. For Records that contain Personal Information:

a. Records must be redacted, burned, pulverized, or shredded so that Personal Information cannot practicably be read or reconstructed;

b. Electronic Records and other non-paper media containing Personal Information and metadata shall be destroyed or erased so that Personal Information or other sensitive data cannot practicably be read or reconstructed. Contact the Office of Information Technology to ensure that electronic media are destroyed appropriately.

Periodically review Records generated and maintained in University information systems or equipment (including mainframe, mini, and micro computing/storage systems) to ensure that these requirements are met.

The attached Record Retention Table lists the official repositories for University Records as well as how long these Records must be retained. These time periods have been reviewed for legal sufficiency by the General Counsel taking into account the minimum requirements of applicable laws and regulations and relevant statutes of limitations periods for filing complaints or claims.

Record retention periods may be increased by government regulation; judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy. The suspension of record destruction required by any of these reasons will be accomplished by a Legal Hold notice sent out to affected units by the General Counsel.

No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in these tables should be addressed to the Records Administrator or the Office of the General Counsel.

Departments and units that are not Official Repositories and that retain duplicate or multiple copies of these University Records should dispose of them when the Records are no longer useful (no later than the duration noted in this Policy).

RECORD RETENTION TABLE

I. Academic / Student Records		
Type of Record	Official Repository	Duration
Academic Integrity Code Violations	Dean College of Arts & Sciences (undergraduate and professional)	Records of final disposition that result in suspension or expulsion: permanent. All other records: 5 years from graduation or last date of attendance
Academic Personnel	Human Resources	See Sections VI-VII
Academic Probation	Registrar	Permanent
Admissions Data for Applicants Who Enroll	Admissions Office	5 years from graduation or date of last attendance
Admissions Data for Applicants Who Do Not Enroll, Whether Accepted or Rejected	Admissions Office	1 year after acceptance/rejection date
Advanced Placement Records and other Placement Test Records/ Scores	Registrar	5 years from graduation or date of last attendance
Annual Conflict of Interest Disclosure Statements (Research)	Office of Research Compliance	5 years from date research project ends
Applications for Admission, professional program (P1) final outcomes rating sheet, letters of reference, progression letter	Admissions Office	5 years after graduation or date of last attendance for students who enroll/1 year after acceptance/rejection for applicants who do not enroll
Applications for Graduation	Registrar	1 year after graduation or date of last attendance
Audit Authorizations and Records	Registrar	1 year after date submitted
Academic Catalogs	Registrar, Enrollment Services	Permanent
Board of Pharmacy Student Completion Reports	Registrar, Experiential Education	Permanent
Change of Course Forms- Continuing Education, Summer Sessions, and Extramural Studies	Registrar	1 year after submission
Change to Student College ID number	Registrar	Permanent
Class Lists (original)	Registrar	Permanent
Consent to Release Personally Identifiable Information (Requests for Non-Disclosure)	Registrar	Kept until next academic year; signatures kept 5 years
Correspondence, relevant	Registrar	5 years from graduation or date of last attendance for students who

		enroll/1 year after acceptance/ rejection for applicants who do not enroll
Course syllabus, any graded student activity or assignment, quizzes, tests, etc.	Learning Management System	End of semester after grade awarded to allow for grade appeals consistent with Academic Catalog
Course Offerings	Registrar	Permanent
Credit / no credit approvals (Audit, Pass/Fail, etc.)	Registrar	1 year after date submitted
Credit by Examination Records	Registrar	5 years from graduation or date of last attendance
Curriculum Change Authorizations	Chairs, College of Arts & Sciences/ Chairs, St. Louis College of Pharmacy	5 years from graduation or date of last attendance
Degree, Grade, and Enrollment Statistics	Registrar	Permanent
Disciplinary Records – Students (findings of violation and related case files)	Vice President Campus Life	Record of final disposition for offenses that result in suspension or expulsion: permanent. All other records: 5 years from graduation or last date of attendance
Enrollment Verifications	Registrar	1 year from enrollment date
Entrance Exam Reports	Registrar	5 years from graduation or date of last attendance/1 year after acceptance rejection for applicants who do not enroll
Financial Aid Records (applicants who enroll), including Federal Perkins Loan Records	Office of Financial Aid	5 years after the end of the award period
Grade and Dismissal Appeals	Dean College of Arts & Sciences/ Dean St. Louis College of Pharmacy	Record of final disposition: permanent; All other records: 5 years after graduation or date of last attendance
Grade Change Forms	Registrar	Permanent
Grade Sheets	Registrar	Permanent
Graduation Lists	Registrar	Permanent
International Student Forms (visa documentation, etc.)	International Programs Office/ Registrar	5 years from graduation or date of last attendance/1 year after acceptance rejection for applicants who do not enroll
Letters of Recommendation (enrolled students)	Enrollment	5 years after graduation or date of last attendance
LMS Courses	Learning Management System	1 year following the end of the current semester
Medical Records, Immunizations, Vaccines, Drug Screens, Background Checks	Enrollment Services (Undergraduate) Experiential Education (Professional)	5 years after graduation or date of last attendance
Name Changes	Registrar	Permanent
Personnel Files, Appointment Letters and Forms	See Human Resources Section	See Human Resources Section
Racial/Ethnic/Statistics	Office of Institutional Research	Permanent
Recruitment Materials (enrolled students)	Admissions Office	5 years after graduation or date of last attendance
Request for Non-Disclosure	Registrar	Permanent
Residency Certificates (enrolled students)	Director of Residency Programs	Until date of enrollment
Schedule of Classes (Institutional)	Registrar	Permanent
Student accommodations (academic)	Student Success Center	5 years from graduation or last date of attendance
Student accommodations (non- academic)	Section 504 Coordinator or designee(s)	5 years from graduation or last date of attendance
Student Class Schedules	Registrar	1 year from graduation date or date of last attendance

Student related codes, handbooks and policies	Registrar	Permanent
Student FERPA Waivers/for Right of Access (enrolled students)	Registrar	Until graduation or date of last attendance
Experiential Program Training Records (HIPAA, Bloodborne Pathogen)	Experiential Education	5 years after graduation or date of last attendance
Transcripts	Registrar	Permanent
Transcripts – High School and Other College (applicants who enroll)	Registrar	5 years from graduation or date of last attendance
Transfer Credit Evaluations	Registrar	5 years from graduation
Trustee Decisions Regarding Academic Personnel and Designated Executives	President's Office	Permanent
Veteran Administration Certifications	Registrar	5 years from graduation or date of last attendance
Withdrawal Authorizations/Leave of Absence	Registrar	Permanent with student academic file

II. Accounting & Finance

Type of Record	Official Repository	Duration
Account Reconciliations (Balance Sheet)	Business Office	7 years
Accounts Payable Vouchers and Attachments	Business Office	7 years
Accounts Receivable Statements, Centrally Generated	Business Office	7 years
Annual Conflict of Interest Disclosure Statement	President's Office	7 years
Annual Financial Reports and Work Papers	Business Office	Permanent
Banking Records, Including Deposits and Withdrawal Records, Bank Statements and Reconciliation, Voided and Canceled Checks	Business Office	7 years
Billing Records	Business Office	7 years
Capital Equipment Records	Business Office	List of Asset: records of equipment purchased on federal funds must be retained for three years after final disposition
Cash Receipts	Business Office	7 years
Contracts	Business Office	Duration of Contract plus 5 years
Depreciation Records	Business Office	Life of Asset
Effort Certifications	Research Administration	7 years
Indirect Cost Rate Calculations	Research Administration	7 years
Inventories	College Services	Life of Asset
Journal Entries	Business Office	7 years
New Account Records and Back-up Documentation	Business Office	7 years after account closing
Procurement Card Charge Documentation	Business Office	7 years
Travel Reimbursements and Attachments	Business Office	7 years
College Audit Work Papers	Business Office	7 years

III. Alumni Affairs & Development

Type of Record	Official Repository	Duration
Alumni records	Development	Permanent
Gift Records	Business Office	7 years
Original Gift Letter Agreements, All Others	Business Office/Development	Permanent
Planned gifts (trusts, life income, agreements, annuities) Real Estate Gifts	Business Office/Development	Permanent

IV. Athletics, Fitness, & Recreation

Type of Record	Official Repository	Duration
Athletic rosters	Athletics Department	Permanent
Medical records; physical exams and medical history, primary insurance carrier, injury eval & treatment	Athletics Department	2 years after graduation or last date of attendance or injury whichever is longer
Player photographs	Athletics Department	Permanent
Eligibility Paperwork (certificates, clearance)	Athletics Department/team physician	5 years after graduation or last date of attendance
Student-Athlete Advisory Committee Annual Report	Athletics Department	Permanent
Alternate Transportation forms	Athletic Department	2 years after completion of season
Supplemental insurance injury claims, back up, follow up submitted info (bills, EOB's, etc.)	Athletic Department	2 years after graduation or last date of attendance or injury whichever is longer
Disciplinary records	Campus Life	See Academic/Student Records
Athletic Scholarship Allocations	Financial Aid	5 years after the end of the award period
Student-Athlete scholarship agreement letters	Athletics Department	5 years after the end of the award period
Leadership through Athletics grades	Athletics Department	Permanent
Annual team records	Athletics Department	Permanent
End of Season Surveys from S-A	Athletics Department	3 calendar years after year of survey
Staff certification records (CPR, etc.)	Athletics Department	See Human Resources personnel file (staff)
Inventory Records	Athletics Department	2 years after date of inventory
Injury Reports (intercollegiate sports, intramurals, F&R) – need a standard form	Athletics Department (Training Room)	2 years after graduation or last date of attendance or date of report
Equity in Athletics Disclosure Act survey	Athletics Department	3 calendar years after year of survey
End of Season surveys (intramurals)	Athletics Department (Fitness & Rec)	3 calendar years after year of survey
Fitness & Rec equipment/room check out logs	Athletics Department (Fitness & Rec)	1 calendar year
Fitness Equipment daily cleaning / regular safety check logs	Athletics Department (Fitness & Rec)	Duration of possession or life of equipment plus 6 months unless injury report then 5 years from the date of report
Fitness Equipment repairs	College Services	7 years from date of repair
V. Construction and Facilities Management		
Type of Record	Official Repository	Duration
As-built Drawings	College Services	Permanent
Contracts and Agreements	College Services	10 years
Record of repairs	College Services	5 years from date of repair
VI. Corporate Records		
Type of Record	Official Repository	Duration
Accreditation Records	President, Deans	Permanent
Articles of Incorporation	President's Office	Permanent
Board of Trustee Minutes	President's Office	Permanent
Bylaws	President's Office	Permanent
Charter	President's Office	Permanent
Trustees' Policies	President's Office	Permanent
VII. Equal Opportunity / Affirmative Action		
Type of Record	Official Repository	Duration
Affirmative Action Plans	Human Resources	1 year
Misc. Federal and State Required Statistics and Reports	Human Resources	2 years
Non-Academic Search Materials and Documents Supporting Hiring Selection Decisions	Human Resources	3 years from date of appointment

Academic Search Materials and Documents Supporting Hiring Selection Decisions	Human Resources	3 years from date of appointment
Complaints of Unlawful Discrimination and Harassment	Human Resources	Permanent
Title IX reports, formal complaints, supportive measures, investigations, evidence, informal processes and resolutions Title IX hearings, appeals, transcripts, evidence, and determinations including disciplinary sanctions and remedies Title IX training materials for investigators, decision-makers, and facilitators (informal process)	Title IX Coordinator	7 years from date of creation
VIII. Human Resources		
Type of Record	Official Repository	Duration
Certificates of Insurance, Indemnification agreements, Contracts and Insurance Policies for Benefits	Human Resources	Permanent
Employee Personnel Files, Non-Faculty (including application, resume, appointment/salary forms, benefits enrollment and application forms, beneficiary designations)	Human Resources	7 years after separation
Faculty Benefits Applications and Paperwork, including Long-Term Disability Forms	Human Resources	7 years after separation
Faculty Handbooks and Policies	Dean College of Arts & Sciences/ Dean St. Louis College of Pharmacy/Human Resources	Permanent
Faculty Personnel Files (including hire paperwork, salary records, status changes, tenure/promotion, retirement/termination, and appointment recommendations)	Dean College of Arts & Sciences/ Dean St. Louis College of Pharmacy	7 years after separation
Faculty Rank & Tenure mid-review (third-year review) assessment dossier, teaching portfolios, evaluation summary	Human Resources	Retain evaluation summary in faculty member's personnel file and return dossier and teaching portfolios to faculty member
Faculty Rank & Tenure Final Application for Tenure and/or Promotion	Human Resources	Retain copies of all committee letters and related correspondence including peer review letters from outside sources; if tenure/promotion denied keep copies of dossier and teaching portfolio and related correspondence 7 years after separation and return original dossier/teaching portfolio to faculty member
Faculty and Staff Benefits Handbook	Human Resources	Permanent
Federal Reporting Requirements: Welfare Benefits and other Fringe Benefit Plans (i.e., 5500-s)	Human Resources	Permanent
Files for Disabled Employees	Human Resources	7 years after benefits end
I-9 Forms (Faculty and Staff)	Human Resources	3 years, or 1 year after separation (whichever is greater)
I-9 forms (Students)	Human Resources	3 years after employment date, or 1 year after termination (whichever is greater)
Individual Contracts of Employment	Human Resources	7 years after separation

Occupational exposure, related employee medical records, monitoring, analysis, material safety data sheets	Human Resources	Duration of employment plus 30 years
OSHA Form 300, Form 301 incident report & annual summary	Human Resources	5 years from end of calendar year covering the incidents
Performance Appraisals	Human Resources	7 years after separation
Records Covered Under HIPAA	Human Resources	7 years after employee's termination
Search Committee Records, including employment applications, resumes, and all applicant search materials	Human Resources	1 year after position is filled
Severance Agreements	Human Resources	5 years after expiration
Staff Handbooks and Policies	Human Resources	Permanent
Union Agreements	Human Resources	Permanent
Worker's Compensation Claims and Insurance Policies	Human Resources	18 years
IX. Insurance		
Type of Record	Official Repository	Duration
Certificates of Insurance, Indemnification Agreements, Hold Harmless Agreements, Contracts	Business Office	5 years after expiration
Insurance Policies (Liability, Property, and Other Policies)	Business Office	Permanent
Incident Reports, Accident Reports	College Services	7 years after report date
X. Legal		
Type of Record	Official Repository	Duration
Consent Orders	Office of the General Counsel	Permanent
Court Orders	Office of the General Counsel	Permanent
Judgments	Office of the General Counsel	Permanent
Releases	Office of the General Counsel	Permanent
Settlements	Office of the General Counsel	Permanent
XI. Marketing and Communications		
Type of Record	Official Repository	Duration
News Releases	Office of Marketing and Communications	10 years
Film, Video, Recordings (negatives, digital assets)	Office of Marketing and Communications	Permanent
Photography Records (negatives, digital assets)	Office of Marketing and Communications	Permanent
Work and Stationery Requests	Office of Marketing and Communications	5 years
Publication Records	Archives	Permanent
Photo and Video Releases	Office of Marketing and Communications	???
Brand Assets and Artwork (digital files)	Office of Marketing and Communications	Permanent
XII. Patent, Trademark and Copyright Records		
Type of Record	Official Repository	Duration
Copyright and Trademark Registrations	Office of the General Counsel	Permanent
Invention Assignment Forms	Office of the General Counsel	Permanent
Licensing Agreements	Office of the General Counsel	7 years after termination
Original Patents and Related Work Papers	Office of the General Counsel	Permanent
Royalty Records	Business Office	Life of Patent or TM plus 7 years
XIII. Payroll		
Type of Record	Official Repository	Duration
Information Returns filed with Federal and State authorities (W-2, 941, 1042S, etc.)	Business Office	7 tax years after filing

Payroll Deduction Authorization Forms (W4, ACH, Bonds)	Business Office	5 years after employment ends
Payroll Vouchers	Business Office	3 years after employment ends
Record of Payments and Deductions (payroll registers, deductions lists, garnishments, adjustments)	Business Office	5 years after employment ends
Time Cards, student	Business Office	3 years after pay date
Time Cards, non-student	Business Office	3 years after employment ends

XIV. Public Safety; Environmental Health and Safety

Type of Record	Official Repository	Duration
Accident Reports	College Services	7 years after report date
Crime Reports	College Services	7 years after report date
Daily Log	College Services	Permanent
Employee exposure, monitoring, analysis	Human Resources	Duration of employment plus 30 years
Property Damage Reports	College Services	7 years after report date
Fume Hood Testing Records	College Services	3 years
Hazardous Waste Disposal Manifests and Reports	College Services	3 years
Incident Records	College Services	5 years
Radiation Safety Training Records	College Services	3 years
Controlled Substances Request Form: DEA Schedule II	EH&S	2 years
Controlled Substances Request Form: DEA Schedule III-V	EH&S	2 years
Controlled Substances Aliquot Log	EH&S	2 Years
Controlled Substances Initial Inventory Form: DEA Schedule II	EH&S	Permanently
Controlled Substances Initial Inventory Form: DEA Schedule III-V	EH&S	Permanently
Controlled Substances Annual Inventory Form: DEA Schedule II	EH&S	2 Years
Controlled Substances Annual Inventory Form: DEA Schedule III-V	EH&S	2 Years
Copy of Invoice(s) Schedule II	EH&S	Permanently
Disposal Form, DEA Form 41,	EH&S	2 Years
DEA Inventory Transfer Form	EH&S	2 Years

XV. Purchasing

Type of Record	Official Repository	Duration
Purchase Orders, Contracts, Agreements	Business Office	7 years

XVI. Real Property

Type of Record	Official Repository	Duration
Property Deeds, Easements, Licenses, Rights of Way, Leases, Rights of First Refusal, Remainder Interests, Mortgages	Office of the General Counsel	Permanent
Property 7 years after close of grant or longer if required by granting agency Tax Returns filed with taxing jurisdiction	Business Office	7 years

XVII. Sponsored Projects, Contracts & Grants

Type of Record	Official Repository	Duration
Grant and contract Applications, Proposals, and Supporting Documentation	Business Office	7 years after close of grant or longer if required by granting agency or sponsor

Sponsored research contracts, subcontracts, material transfer agreements	Business Office	7 years after close of grant or longer if required by granting agency or sponsor
Records Concerning Animal or Human Subject Research	Institutional Animal Care Use Committee (animals)/Institutional Review Board (human subjects)	7 years from completion of study or longer if required by study sponsor
XVIII. Taxes		
Type of Record	Official Repository	Duration
Excise Tax Returns	Business Office	7 years
Information Returns (990, 1099, Form PC, etc.)	Business Office	20 years
Sales Tax Returns	Business Office	7 years

Responsibilities:

Position/Office/Department	Responsibility
Vice President, Operations	Oversight, coordination of Records retention policy administration
General Counsel	Supports Vice President of Operations to coordinate annual review and update of Records Retention Table

Resources:

Legal Hold Policy

Policy Contacts:

Name	Contact Information
Eric Knoll Vice President, Operations	Eric.Knoll@uhsp.edu
Ken Fleischmann General Counsel	Kenneth.Fleischmann@uhsp.edu