

# RECORDS MANAGEMENT POLICY

## GENERAL INFORMATION

Policy Statement: Washington University requires that its records be managed in a manner consistent with applicable law, and in accordance with plans developed by the schools, departments, and other units that maintain University Records.

Purpose of Policy: Washington University has adopted this Records Management Policy to meet the administrative, legal, financial, research, and historical needs and requirements of the University.

University Records: University Records are **all** forms of recorded information, regardless of physical characteristics, that are created, received, recorded or maintained in the course of University business. The term “University business” includes but is not limited to administrative, academic, clinical, and research endeavors. Formats and media for University Records include but are not limited to: documents, books, papers, notes, photographs, maps, sound recordings, e-mails, electronic records, and original microfilm. With the exception of those records that are owned by the individual authors of such records pursuant to our Intellectual Property Policy, all University Records are the property of the University, not the individual. In addition to original University Records, reproductions of these records (whether informational copies or personal copies) may have the same legal significance as the original and therefore are subject to this policy. The University is entitled to retain one or more copies of those University Records that are owned by the individual authors of such records pursuant to our Intellectual Property Policy, such as scholarly works prepared by faculty and students of the University, for the purpose of complying with applicable law or this policy.

Electronic Records: This policy applies to University Records regardless of format or medium, including University Records in electronic formats such as e-mail, voicemail, instant messages, text messages, word processing documents and spreadsheets, and databases. The content of an electronic document determines whether it is a University Record, the resulting retention period, and the appropriate method of disposal.

## RECORD RETENTION

Retention of University Records: It is the responsibility of each University employee and of independent contractors, appointees, and other non-employees performing University business, to maintain University Records in a manner consistent with legal requirements and University policy. The schedule below lists the minimum retention periods for

certain types of University Records. Schools, departments, divisions and functional units (collectively “University Areas”) should develop schedules of retention periods for University Records regularly used in the course of their activities. The retention periods set forth in those schedules should be at least as long as any applicable legal retention period, and must also be consistent with the business needs of the University Area. Questions regarding applicable legal retention periods should be directed to the Office of Executive Vice Chancellor and General Counsel (“OGC”) at msutton@wustl.edu.

It is sometimes the case that two or more University Areas will use or retain the same University Record. For example, some documents are often retained electronically by Administrative Information Systems or the Accounts Payable Department, and in hard copy by other units. In such cases, the Records Coordinators (designated in accordance with the Implementation section of this policy, below) for University Areas using the same University Record may agree in writing that one University Area will be responsible for retention of the official version under this Policy. The Records Coordinators are responsible for ensuring that staff in their University Areas understand and implement any such agreements.

Preservation of Records and Other Documents Related to Legal Matters: OGC may issue Legal Holds, directing recipients to retain certain documents, data, and tangible things related to legal matters such as litigation, arbitration, audits, and government investigations. Legal Holds apply to documents, data, and things within their scope, regardless of whether the information is a University Record, and regardless of the information’s format or medium (hardcopy paper, microfilm, e-mail, or other electronic documents), the status as an original or a copy, the location, or the custodian. Legal Holds supersede the Records Retention Schedule, and University Records subject to a pending Legal Hold must be preserved even if the applicable retention period under the Records Retention Schedule has expired.

University Areas aware of pending or anticipated legal matters, through receipt of a Legal Hold notice or otherwise, must identify the location of all documents, data, and tangible things related to the legal matter, suspend all destruction processes for such information, and retain such documents, data, and things in their existing format (paper, electronic, or other format) until otherwise notified by the OGC. If University Records are retained on personal devices, such as computers, laptops, tablets, cell phones, flash drives or other devices or media, those devices or media must be provided to the University for implementation of the applicable Legal Hold. OGC will notify the appropriate University Area when the Legal Hold has been lifted.

Retention of Email: Email messages are University Records if they are created or received in the transaction of University business. Email that does not meet the definition of a University Record (such as personal email or junk email) should be deleted

from the system to avoid unnecessary accumulation. Email messages that are University Records may be transferred to another electronic storage location (i.e. disk or electronic storage database) or printed and stored. The printed copy of an email should contain all of the following: who sent the message, who received the message, date and time the message was sent, the subject, the content of the message, and the full content of any attachments. Email messages that are subject to a Legal Hold must be preserved in their original, electronic format.

## DISPOSAL OF RECORDS

Consistent with the University's sustainability initiatives and to reduce storage costs, the University encourages University Areas to promptly dispose of University Records when their legal retention period has expired and there is no longer a business, historical or other need to retain the records, **unless** the records are subject to a Legal Hold.

Records are to be disposed in one of the following ways:

1. Non-confidential records: Recycle paper records that do not contain sensitive, confidential, personally identifiable, or other protected information. Delete or destroy electronic records that do not contain sensitive, confidential, personally identifiable, or other protected information.
2. Confidential records: Records that contain sensitive, confidential, personally identifiable, or other protected information should be disposed of in a manner that ensures that such information cannot be read or reconstructed. Contact OGC ([msutton@wustl.edu](mailto:msutton@wustl.edu)) if you have any questions regarding the confidential status of a document or category of documents, or appropriate disposal methods.
3. Permanent records: Records that have been determined to have permanent value to the University should be sent either to off-site storage or to the University archives. Contact the University Archivist if you believe you have records with historical significance to the University. Additional information regarding transfer of University Records to the Archives is located at <https://library.wustl.edu/spec/archives/giving.html>

## **POLICY IMPLEMENTATION**

Each University Area must designate a Records Coordinator. The Records Coordinator serves as a contact with OGC in the implementation of Legal Holds and therefore, the name of each Records Coordinator must be reported to the OGC. The Records Coordinator shall establish unit-specific procedures for record retention and disposition in accordance with this policy and shall ensure that the procedures are followed.

Suggested duties, among others as needed, for Records Coordinators include the following:














- Develop and document area-specific procedures for implementation of the retention and destruction obligations set forth in this policy and distribute to other unit personnel, including independent contractors, appointees, volunteers and other non-employees conducting University business, as appropriate.
- Establish contact with an off-site storage vendor for long-term record retention. Examples of vendors are Recall and Iron Mountain.
- Prepare an inventory or listing of the types of records produced, received or maintained by the unit in the regular course of business. Determine the legal retention period for type of University Record. Many, but not all, record types and retention periods are listed in the schedule attached to this policy. If your unit requires assistance in determining the applicable legal retention period for a type of University Record that is not listed below, consult with the Director of External Reporting (contact information below) or OGC ([msutton@wustl.edu](mailto:msutton@wustl.edu)).
- Maintain documentation of the disposition of University Records, whether destroyed, sent to long-term storage, or turned over to the University archives. Documentation for archived or stored University Records should be of sufficient detail and organized in a manner to facilitate efficient recall as the need arises.
- Ensure that procedures are in place to safeguard confidential, sensitive, personally identifiable, or other protected information.
- Monitor unit compliance with policies and procedures.

Effective Date: April 6, 2023

### RETENTION SCHEDULE

The table below lists a number of records commonly in use at the University. It is not an exhaustive list of all University Records to which this policy applies. Employees responsible for individual department record retention procedures are encouraged to contact the Director of External Reporting if they believe a particular type of record has broad usage and should be added to this schedule.

If you have questions about the University's record retention or disposal policies, please contact the Director of External Reporting at 935-4562 or at [joe\\_mcgarry@wustl.edu](mailto:joe_mcgarry@wustl.edu).

 <a href="#">Account Reconciliations</a>	 <a href="#">Time &amp; Leave Documents</a>	 <a href="#">Contracts</a>
 <a href="#">Accounts Receivable</a>	 <a href="#">Personnel</a>	 <a href="#">Student Files</a>
 <a href="#">Accounting</a>	 <a href="#">Work Orders</a>	 <a href="#">Additional Documents</a>
 <a href="#">Payroll</a>	 <a href="#">Drug Studies</a>	 <a href="#">Tax</a>
 <a href="#">Electronic Records</a>		

A brief description indicates what types of abbreviations you will see in the table.

<b>Abbreviations</b>	
<b>ACT</b>	Active; while the matter is active. For example, while the contract is active or you own the property
<b>CY</b>	Calendar Year; all records created in the same year are treated as though they were created on December 31 of that year
<b>IND</b>	Indefinitive; the retention for certain records cannot be determined in advance so those records must be reviewed periodically to determine whether or not they can be destroyed
<b>SUP</b>	Superseded; keep the records until they are replaced by more current ones.
<b>TAX</b>	Tax return filing date; all records created to document information in a tax return, including the tax return, are treated as though they were created on the day the tax return was filed.
<b>+</b>	Plus; some retention periods consist of two or more components. For example, capital asset records should be kept while they are active plus six years (ACT + 06)
<b>FR</b>	Final Report year; all records created while the project is active
<b>All record retention periods are in "years" unless months (M) or days (D) are specified.</b>	

<b>RESEARCH DATA AND MATERIALS</b>	See retention guidelines at <a href="https://research.wustl.edu/research-data-and-materials-policy/">https://research.wustl.edu/research-data-and-materials-policy/</a>
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<b>ACCOUNT RECONCILIATIONS</b>	<b>Unrestricted</b>	<b>Restricted</b>
Ledger sheets	CY + 04	FR + 04
Free balance reports	CY + 04	FR + 04
Year ending reports from Workday	CY + 04	Fr + 04

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<b>ACCOUNTS RECEIVABLE</b>	<b>Unrestricted</b>	<b>Restricted</b>
Patient charge batches	6M	6M
Patient payment batches	6M	6M
Patient adjustment batches	6M	6M
Cash receipt logs	CY + 04	FR + 04
Patient receipt books	CY + 04	FR + 04
Appointment books	CY + 04	FR + 04
Outside billings (not related to patients)	CY + 04	FR + 04
Lock box deposits	CY + 04	FR + 04
Patient billing records (fee tickets)	CY + 04	FR + 04
Facility bills	CY + 04	FR + 04
Telephone bills	CY + 04	FR + 04
Computing bills	CY + 04	FR + 04
Computing account number information	CY + 04	FR + 04
Tuition 3rd party and awards	CY + 04	FR + 04
Tuition TIP reports	CY + 04	FR + 04

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<b>ACCOUNTING</b>	<b>Unrestricted</b>	<b>Restricted</b>
Check Requests - auto approval	CY + 04	FR + 04
Check Requests - central area approval required	CY + 04	FR + 04
Journal	CY + 04	FR + 04
Payroll Cost Transfer	CY + 04	FR + 04
Invoice Statements	CY + 04	FR + 04
Budget Adjustments	CY + 04	FR + 04
Interdepartmental Orders	CY + 04	FR + 04
Purchase Orders	CY + 04	FR + 04
Purchase Order Requisitions	CY + 04	FR + 04
Travel Reports	CY + 04	FR + 04
Travel Advances	CY + 04	FR + 04
Petty Cash forms	CY + 04	FR + 04
Free balance and other A/P invoices	CY + 04	FR + 04

Receipt Vouchers	CY + 04	FR + 04
Asset acquisition and disposal forms	CY + 04	FR + 04
Equipment orders	CY + 04	FR + 04

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<b>PAYROLL</b>	<b>Unrestricted</b>	<b>Restricted</b>
Time Cards	CY + 04	FR + 04
Appointment funds	CY + 04	FR + 04
Bi-weekly time sheets	CY + 04	FR + 04
Authorization forms	CY + 04	FR + 04
PARS	CY + 04	FR + 04
Accruals	CY + 04	FR + 04
Payroll distribution reports	CY + 04	FR + 04

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<b>PERSONNEL</b>	<b>Unrestricted</b>	<b>Restricted</b>
Applications and resume	7 years after term.	7 years after term.
Performance evaluations	7 years after term.	7 years after term.
Corrective counseling documents	7 years after term.	7 years after term.
Pay change documentation	7 years after term.	7 years after term.
Training history	7 years after term.	7 years after term.
Resignation/termination letter	7 years after term.	7 years after term.
Personal Data Information Form	Destroy after posting to HRMS	Destroy after posting to HRMS
I-9 forms	Retained by Human Resources	Retained by Human Resources
Payroll deduction forms (W-4)	Retained by Payroll Services	Retained by Payroll Services
Benefit forms – related to health insurance, retirement, tuition reimbursement	Retained by the Benefits Office	Retained by the Benefits Office
Monthly leave records and time sheets	CY + 3	CY + 3
Garnishments	CY + 02	FR + 02

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<b>WORK ORDERS</b>	<b>Unrestricted</b>	<b>Restricted</b>
Custodial	CY + 04	FR + 04
Maintenance	CY + 04	FR + 04
Telephone	CY + 04	FR + 04

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<b>DRUG STUDIES</b>	<b>Unrestricted</b>	<b>Restricted</b>
Contracts	IND	IND
Patient files	IND	IND
Case report forms	IND	IND
Budget negotiations	IND	IND
IRB approvals	IND	IND
Protocols	IND	IND

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<b>CONTRACTS</b>	<b>Unrestricted</b>	<b>Restricted</b>
Maintenance	CY + 04	FR + 04
Community service	CY + 04	FR + 04
Laundry	CY + 04	FR + 04
Agreements with design professionals, contractors and other construction-related agreements	IND	IND

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<b>STUDENT FILES</b>	<b>Unrestricted</b>	<b>Restricted</b>
Loans	IND	IND
Student applications	IND	IND
Cancellations	IND	IND
Delinquency reports	IND	IND
Notes/Correspondence	IND	IND

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<b>ADDITIONAL DOCUMENTS</b>	<b>Unrestricted</b>	<b>Restricted</b>
Cashier balancing sheets	CY + 04	FR + 04
Customer requests for library	CY + 04	FR + 04



reference services		
Miscellaneous logs	CY + 04	FR + 04
Budgets	CY + 04	FR + 04
FIS authorizations	CY + 04	FR + 04
Insurance add/delete forms	CY + 04	FR + 04
Medical records	10 years from date of last visit (for minors, the LATER of the 23rd birthday or 10 years from date of last visit)	10 years from date of last visit (for minors, the LATER of the 23rd birthday or 10 years from date of last visit)
Patient insurance cards, photocopies and images	CY + 02	FR + 02
Patient videos	CY + 04	FR + 04
A/R month-end reports	CY + 04	FR + 04
Support service logs	CY + 04	FR + 04
Space - departmental space	CY + 04	FR + 04
Floor plans/blueprints	IND	IND
Renovation proposals/projects	IND	IND
Resource allocation report	CY + 04	FR + 04
Assets - moveable equipment	ACT + 06	ACT + 06
Daily log slips	CY + 04	FR + 04
Monthly reports	CY + 04	FR + 04
Sponsored awards/agreements	N/A	FR + 04

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<b>TAX</b>	
Employment tax filings	CY + 04
Excise tax filings	CY + 04
Income tax filings	CY + 04
Sales tax filings	CY + 04
Tax returns	CY + 04
Tax returns employment	CY + 04
Tax returns excise	CY + 04
Tax returns income	CY + 04
Tax returns motor fuel	CY + 04

Tax returns property	CY + 04
Tax returns sales	CY + 04
Tax returns unemployment	CY + 04
Tax returns use	CY + 04
Tax exempt debt records – for details see <a href="http://tax.wustl.edu/policies/Pages/TaxExemptDebtRecordRetention.aspx">http://tax.wustl.edu/policies/Pages/TaxExemptDebtRecordRetention.aspx</a>	Period debt issue is outstanding plus three years