

# University Records Management and Retention Policy

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Approved 6/5/07

## I. Purpose

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The purpose of this policy is to establish a records management governance structure for Saint Louis University in order to ensure:

- Fulfillment of all federal, state, and other legal and institutional requirements
- Privacy and security of institutional and constituent information
- Retention of and access to records throughout the retention period
- A consistent, orderly, and effective process of records review, transfer, and destruction
- More efficient use of resources, to minimize the costs associated with retention of records

## II. Scope

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This policy governs the management, handling, and destruction of all University Records.

University Records (or “Records”) include: any stored information, document, or image created, developed, or received by any academic, clinical, or administrative office of the University in the course of conducting University business or in pursuance of the University's legal obligations.

Materials that are generally not considered University Records within this policy include, but are not limited to University library and museum material made or acquired and preserved solely for research, reference or exhibition purposes, and personal papers neither related to the official function of an office nor created in pursuance of University activities.

## III. Definitions

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### A. Definitions of Record Types

There are two types of Records:

1. Permanent: A Permanent Record is a type of Record that has enduring value to the institution's existence and operation.
2. Temporary: A Temporary Record is a type of Record that has only temporary value to the institution and is normally not submitted to the Archives. Most University Records are Temporary Records. Some Temporary Records may be considered for retention in the Archives if they have sufficient enduring value.

## **B. Definitions of Record States**

A Record may be in any of the following five states:

1. Active: An Active Record is a type of Record that has not yet reached the end of the record retention period.
2. Expired: An Expired Record is a type of Record that has reached the end of its retention period but has not yet been destroyed.
3. Destroyed: A Destroyed Record is a type of Record that has been destroyed; normally only Expired, non-Preserved Records are eligible to be Destroyed.
4. Archived: An Archived Record is a type of Record that has been submitted to and accepted by the University Archives, and is maintained within the University Archives
5. Preserved: A Preserved Record is a Record that has been selected for special handling that supplements and overrides the parameters of the Record Retention Schedule.

A Record may be in only one of the states of Active, Expired, Destroyed, or Archived. A Record that is Active, Expired, or Archived may also be a Preserved Record.

## **C. Functional Areas**

Operational Unit: a University administrative unit, office, or function that handles (receives, stores, processes, or disseminates) University Records.

Primary Office of Record (“POR”): an Operational Unit that has been so designated by the Information Security Committee (“ISC”) and is responsible for oversight of a category of Records.

University Archives (“Archives”): the unit so named, which is part of the University Library

## **D. Other Terms**

Record Retention Schedule: the approved University document that specifies the retention duration and other key decisions about Record handling for each category and type of Record.

# **IV. Policy**

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## **A. Record Handling by Operational Unit**

Operational Units must handle all Records under their control in accordance with the requirements of this policy.

Operational Units are responsible for ensuring that University Records under their control are not destroyed, discarded, sold, or otherwise disseminated without proper authorization.

## **1. Record Storage and Labeling**

Each Operational Unit must adhere to the standards set by the POR for storage and labeling of Records under its control. There must be physical and environmental protections in place to preserve the confidentiality, integrity, and access to the Records. Labeling must be clear and unambiguous.

The Operational Unit shall notify the appropriate POR if there is any unnecessary or excessive risk to the Records or if any Records have been known to be lost or compromised. Examples of causes of loss of Records include, but are not limited to, water damage, fire, theft, computer server failure, or time-caused deterioration.

The minimum standards for labeling require a clear, accessible, legible label that contains the following information:

- The type of information
- The Operational Unit responsible for the Records
- Beginning and ending dates of the contents
- Date of destruction review along with the following notice  
“Record Retention Schedules may have changed since this label was created; consult the current Retention Schedule for guidance before taking action.”
- Sequential numbers of a set (e.g., 1 of 4, 2 of 4, etc.), and
- Any special tagging (e.g., “Attorney-Client Privileged”, “Regulatory Report”, “Permanent”, or “Preserved”)

It is the responsibility of each Operational Unit to update the labels of stored Records to the extent feasible to reflect current retention period in the destruction review date based on updates to the Record Retention Schedule.

In the event that an Operational Unit transfers possession of Records to another Operational Unit or a third party, it is the Operational Unit’s ongoing responsibility to ensure that the Records are handled and stored in accordance with appropriate standards.

## **2. Regular Review of Records**

### **a. Review Frequency**

Each Operational Unit (other than the University Archives) shall perform a review of all University Records under its control at least once per year or more frequently if required by the POR. The type of year (e.g., fiscal

year, calendar year, academic year) may be determined by the POR, and will be calendar year unless otherwise specified.

#### **b. Retention Decision**

The Operational Unit shall use the current Record Retention Schedule. The schedule lists types of Records and the retention period for each. The Operational Unit is responsible for consulting the POR if there is any uncertainty or confusion about the appropriate application of the Record Retention Schedule.

If a Record contains an inseparable combination of Record types with different retention periods (such as a report containing two categories of data), then the longest retention period will apply. In using the Record Retention Schedule, if there are inconsistencies in the retention periods, the longer period will apply.

The retention decision process shall incorporate the process of handling Preserved Records in order to ensure that Preserved Records are not destroyed.

#### **c. Reporting and Documentation**

The POR shall set a standard for reporting and documentation of reviews by category of Record. At a minimum, the Operational Unit is required to maintain a review log describing the date(s), location(s), personnel who performed the review, types of Records (categories and other distinguishing characteristics), the number and type of Records identified as Expired, and the number and type of Preserved Records.

### **3. Archive Submission**

Operating Units must submit Records to the University Archives according to the parameters of the Record Retention Schedule. For questions regarding any materials that have potential historical or institutional value but that are not included on the Record Retention Schedule, Operating Units should consult the Archives for guidance.

Any Operating Unit that maintains Permanent Records outside of the Archives may do so only in coordination with the University Archives.

### **4. Destruction**

Operational Units must destroy Expired, non-Preserved Records within a reasonable period of time after the retention period has elapsed.

It is prohibited to destroy any Record that is Active, Archived, or Preserved. Once a Preserved Record is no longer designated as a Preserved Record, it is to be handled according to its status and age.

The process of Record review and destruction must incorporate all media containing those Records. Records may exist in many types of media including, but not limited to paper, various electronic forms (e.g., on-line storage, backup tapes), microfilm, or microfiche.

All Expired non-Preserved Records that contain confidential information must be destroyed in an approved manner that renders them unreadable and irretrievable. The ISC will maintain a standard for destruction, such as using the University-contracted shredding service.

Each Operational Unit shall maintain a destruction log and retain the destruction log as a Permanent Record unless the Record Retention Schedule specifies that it is a Temporary Record with a schedule for expiration. The Operational Unit shall provide reports and information regarding Record status, activity logs, and other information as appropriate to the POR when requested.

## **5. Preserved Record Handling**

When an Operational Unit becomes aware of an action or has a reasonable basis for anticipating an action that represents a need to designate Records as Preserved Records, it is that Operational Unit's responsibility to either be the coordinating office or to locate the coordinating office for the action response. Types of actions that may require preservation include, but are not limited to, an audit, investigation, litigation, claim, or a legal or judicial action. The coordinating office is responsible for determining which Records are Preserved Records, notifying the appropriate Operational Units and working with them to preserve and use the Records for this action, and notifying the Operational Units when an action has been resolved and when the Records are no longer Preserved Records.

The coordinating office is responsible for notification of specific requirements regarding which Records are to be preserved. Additional requirements may include, but are not limited to preserving original documents rather than copies, and increased security safeguards. A modification in either content or format to a Preserved Record beyond what is specified is prohibited.

When designating Records as Preserved, the coordinating office must ensure that the designation is unique, unambiguous, and does not cause a breach in the confidentiality of the action or the response. In the event that a Record is designated as a Preserved Record for two separate actions, the resolution of one action must not result in the premature destruction of the Record for the purposes of the other action.

## **B. Record Management Roles**

The responsibility for oversight and operations of the records management system is distributed across four areas of responsibility: the ISC for coordination and oversight, POR for primary operational responsibility for a category of Record, Operational Units, and University Archives.

### **1. Role of Information Security Committee**

The ISC serves a centralized oversight and coordination role in the records management system.

The ISC is responsible for the following:

- General oversight of the records management system structure
- Designating which Operational Units are Primary Offices of Record for a category of Record
- Development of policy and retention schedules in coordination with Primary Offices of Record and other offices as appropriate
- Monitoring and review of effectiveness of records management policies, standards, and processes
- Submitting new or updated policies or retention schedules to University executive management for approval
- Disseminating information regarding policy and general record management information to the University community

### **2. Role of Primary Office of Record**

The Primary Offices of Record provide oversight for the handling and retention of a category of Record.

Each POR is responsible for the following

- Identifying and defining the retention periods for its category of Record and proposing a schedule to the ISC
- Coordinating with the University Archives on the storage, retention, and access for those Permanent Records that are not stored in the Archives
- Monitoring changes in legal, regulatory, best practices, and University goals and requirements, reviewing the retention schedule, and proposing retention schedule changes to the ISC
- Providing training and information to the Operational Units that handle their category of Record on records management procedures, policies.
- Providing assistance to Operational Units in identifying the Active Records that should be considered Expired. (The primary means of guidance is the Record Retention Schedule.)
- Setting a standard for ensuring that Records are properly maintained, protected, and accessible for the duration of the Record Retention Schedule.

- Setting a standard for documentation and reporting of reviews.
- Setting a standard for review frequency if a review is required more frequently than once per year
- Setting any additional specific standard for labeling of stored Records beyond the minimal standards as appropriate
- Reviewing the Operational Units Record handling to ensure compliance with the Record Retention Schedule, policies, and standards
- Reporting status and information on record management activities to ISC and others as appropriate

For those Primary Offices of Record with a Data Steward, the Data Steward will normally serve as the point of contact and responsibility for Records and records management.

### **3. Role of Operational Unit**

The Operational Unit is responsible for handling Records under its control according to policy, standards, and other guidance from the applicable Primary Offices of Record.

The Operational Unit is responsible for assisting the coordinating office for Preserved Records, and either retaining them securely, providing copies, providing originals, or assisting in any other appropriate manner. The Operational Unit shall coordinate any modification, format change, or destruction with the coordinating office to ensure that a Preserved Record remains preserved. Destruction of Preserved Records is prohibited. In the event that a Preserved Record is lost, the Operational Unit shall promptly notify the coordinating office.

Each Operational Unit is responsible for the following:

- Maintaining and securing Active Records under its control
- Developing unit-specific procedures that are consistent with the goals of the records management system for information and processes.
- Handling University Records in accordance with standards of each POR. In the event that the Record Retention Schedule is unclear, the Operational Unit should consult with the POR to ensure that the information is handled appropriately.
- Performing scheduled reviews of Records under their control
- Submitting Records to the University Archives when appropriate
- Maintaining an inventory of Records under its control, and coordinating records management with the appropriate Primary Offices of Record
- Maintaining logs of reviews and of Destroyed Records; retain as a Permanent Record unless otherwise specified in Record Retention Schedule
- Make documentation about Records (logs and related information) available for review and inspection by the POR or the ISC
- Destroying non-Preserved, Expired Records

- Ensure operational compliance with this policy in unit activities

In the event that an Operational Unit has or learns of a requirement to retain a Temporary Record beyond the retention period, the office must request and be granted an exception by the POR in order to do so.

It is expected that each Operational Unit will set a schedule for unit-specific Records that are not included in the Record Retention Schedule.

Operational Units may consult the University Archives regarding decisions concerning the reformatting and storage of Records.

#### **4. Role of University Archives**

The University Archives serves as the University repository of some Permanent Records, historical documents and information, and other items of enduring or long-term value to the University in order to:

- Preserve the institutional character and history
- Build and support reputation and image
- Respond to patron questions and requests
- Support research
- Public service; good will

In terms of records management, the University Archives is responsible for:

- Specifying the criteria and requirements for handling some types of Records prior to submission
- Providing advice and guidance to Operational Units:
  - During review of Active Records to determine value for the Archives
  - Regarding reformatting of Records
- Providing advice and guidance to Primary Offices of Record during review of retention periods and for questions about storage and handling of Permanent Records outside of the Archives
- Managing archives through:
  - Receiving, storage, preservation, and use of Archived Records
  - Reviews of Archived Records
  - Managing access requests to Archived Records, providing access on a need-to-know basis according to the specifications
  - Present archived materials through presentations, exhibits, reference services, and other community involvement
  - Determining space, accessibility, and cost trade-offs for archived materials

The University Archives may perform reviews of Archived Records as often as practical, and generally within every three (3) years.

As a result of the review, any Temporary Records may remain within the Archive, or may be removed from the Archive. When a Temporary, Archived Record is removed from the Archives, the Archives will make some attempt to consult with the POR for a decision either to proceed to destroy the Record or to return it to the POR.

The University Archives may develop and use policies and procedure to govern access to and use of Archived Records. In addition to the access restrictions specified by the POR, the University Archives may develop additional access restrictions including, but are not limited to, who may access, duration of access, right to copy and/or distribute, physical locations of access, special handling precautions, and other restrictions as appropriate to the value of the Records to the University.

### **C. Sanctions**

Violation of this policy may result in sanctions against those responsible. Destruction of Active or Preserved Records will be considered a serious offense. In addition to University discipline, violators may be subject to criminal prosecution, civil liability, or both.

### **D. Questions**

Questions about this policy or related matters may be referred to the ISC. Questions about a specific type of information should be referred to the POR for that information.

**Appendix: (not part of policy)**  
**Sample List of Primary Offices of Record**  
As of: 1/26/07

**DRAFT**

The Primary Offices of Records include, but are not limited to,

- Student (Registrar, Student Affairs, International, Housing & Dining, Residence Life)
- Financial
- Financial Aid
- Human Resources
- Development
- Provost and Academic Departments
- Faculty
- Library (includes Archives)
- Athletics
- Research
  - Sponsored Programs (financial sponsorship of research, both public and private)
  - Institutional Review Board (controls of research protocols)
  - Primary Investigators (substance of research activities)
- Medical (Clinical, Student Health, Medical Records)
- Administration (e.g., Audit, Affirmative Action, Committees, Faculty Senate, Accreditation)
- Contracts
- Publications and News Releases
- Facilities (includes Public Safety, Events)
- Information Technology
- General Counsel (for Preserved Records, Attorney-Client Privileged, Regulatory Reports; includes Legal, Audit, Affirmative Action, Risk Management)
- Safety (hazardous materials &c.)
- Madrid (?)
- Unit Functions

**Appendix: (Not part of policy)**  
**Record Retention Schedule**

As of: <date>

The following table is a *sample* of Record Retention Schedule elements.

<b>POR</b>	<b>Category</b>	<b>Retention</b>	<b>Description</b>
Finance	Accounting	3 prior years plus current year	Journal entry detail
Finance	Accounting	Permanent	Annual financial statements
Finance	Accounting	Current year (until audit)	Banner Report: Batch File List (VBM100)
Finance	Accounting	5 prior years	Banner Report: Detail Trial Balance
Finance	Accounting	Permanent	Active Fund Information Folders
Finance	Accounting	3 years after fund closing	Closed Funds Folders
Finance	Accounting	3 prior years plus current year	Security Transactions
Finance	Accounting	3 prior years plus current year	Tenet Hospital Bills
Finance	Accounting	5 prior years plus current year	Quarterly Financial Statements
Finance	Accounting	5 prior years plus current year	VP Designated/Restricted Report
Finance	Accounting	3 prior years plus current year	Campus Construction Projects
Finance	Sponsored Programs	3 prior years plus current year	Account Folders
Finance	Sponsored Programs	5 prior years plus current year	Quarterly Reports- LOC
Finance	Accounts Payable	3 prior years plus current year	Vouchers
Finance	Accounts Payable	3 prior years plus current year	Original Purchase Requisitions
Finance	Payroll	6 prior years plus current year	Time and Attendance Sheets
Finance	Payroll	6 prior years plus current year	Payroll Registers
Finance	Payroll	6 years after termination	W-4's
Finance	Payroll	2 years after settlement/termination	Garnishments
Finance	Payroll	6 prior years plus current year	W-3's
Finance	Payroll	6 prior years plus current year	1099's
Finance	Payroll	6 years after termination	Union Dues, Jury Duty
Finance	Payroll	6 years after termination	United Way, Parking Bonds
Finance	Payroll	6 years after termination	Teachers/Parks Credit Union
Finance	Payroll	6 prior years plus current year	Work Study Timesheets
Finance	Travel	6 prior years plus current year	Travel/Expense Reports
Finance	Student Accounts	3 prior years plus current year	Statements of Accounts
Finance	Student Accounts	3 years after paid in full	Delinquent Account Records
Finance	Student Accounts	3 prior years plus current year	Tuition and Fee Assessment Tables
Finance	Student Loans	4 years after paid in full	Loan Notes
Finance	Cashiers	3 prior years plus current year	Banner Daily Cash Report
Finance	Cashiers	3 prior years plus current year	Bank Deposit Slips

<b>POR</b>	<b>Category</b>	<b>Retention</b>	<b>Description</b>
Finance	Cashiers	3 prior years plus current year	Tuition Cards (payment stubs)
Finance	Cashiers	3 prior years plus current year	Bank Transfer and Cash Entries
Finance	Cashiers	3 prior years plus current year	Deposit of Funds Form
Finance	Financial Services	Permanent	Active Fund Information Folders
Finance	Financial Services	Permanent	Banner Finance Access Requests (Active)
Finance	Financial Services	Permanent	Credit Card Program Release and/or Employee Agreement Documentation
Student	Registrar	6 months	Academic Record Requests
Student	Registrar	Permanent	Census Enrollment Data
Student	Registrar	Permanent	Grade Change Forms
Student	Registrar	Permanent	Grade Sheets
Student	Registrar	2 years	Registration Forms (Normal)
Student	Registrar	2 years	Registration Forms (1818)
Student	Registrar	Permanent	Student Academic History
Student	Registrar	1 year	Student Address Update
Human Resources	HR	2 years	Applications for Employment
Human Resources	HR	Term of employment plus 7 years	Grievance Filings
Human Resources	HR	Term of employment	Individual Vacation and Sick Leave Accrual
Human Resources	HR	Term of employment plus 7 years once inactive	Personnel Files
SLUCare	Administration	Term of Lease plus 10 years	Lease Agreements
SLUCare	Administration	Indefinite	Policies and Procedures
SLUCare	Admissions	Permanent	Admissions Log Book
SLUCare	Admissions	Permanent	Death Register
SLUCare	Infection Control	3 years	Communicable Disease Reports to State and Local Health Departments
SLUCare	Infection Control	Permanent	Minutes & Reports of the Infection Control Committee
SLUCare	Laboratory	Permanent	Blood Bank Inventory
SLUCare	Laboratory	12 years	Infection Control Report
SLUCare	Laboratory	Permanent	Internal Report (Cytology)
SLUCare	Laboratory	Indefinite	Quality Control Procedures
SLUCare	Maintenance	3 years	Infectious Waste Incinerator: Maintenance Logs
SLUCare	Maintenance	1 year	Boiler Temperature Readings
SLUCare	Maintenance	3 years	Fire Drill Log
SLUCare	Medical Records	10 years or until a patient's 23rd birthday	Medical Records (Patient Chart File)
SLUCare	Medical Records	Permanent	Death Register
SLUCare	Medical Records	10 years Indices	Diagnosis, Procedure & Physician
SLUCare	Medical Records	Permanent	Emergency Room Patient Log
SLUCare	Medical Records	10 years or until a patient's 23rd birthday	Outpatient Emergency Room File

<b>POR</b>	<b>Category</b>	<b>Retention</b>	<b>Description</b>
SLUCare	Medical Records	10 years	Medical & Surgical Audit
SLUCare	Medical Staff Records	Permanent	Physician Files
SLUCare	Medical Staff Records	Permanent	Physician Agreements
SLUCare	MedicoLegal	10 years or until a patient's 23rd birthday	Incident Reports: Patient
SLUCare	MedicoLegal	5 years from Date of Incident	Incident Reports: Employee
SLUCare	MedicoLegal	5 years from Date of Incident	Incident Reports: Visitor
SLUCare	MedicoLegal	30 years	Material Safety Data Sheets
SLUCare	Nuclear Medicine	10 years or until a patient's 23rd birthday	Isotope Dosage Admitted to Patient
SLUCare	Nuclear Medicine	Permanent	X-Ray Film
SLUCare	Nursing	1 year	Daily Floor Census
SLUCare	Nursing	5 years	Daily Schedule for Nurses
SLUCare	Nursing	5 years	Minutes of all Committee Meetings
SLUCare	Occupational Health	Permanent	Employee Health Records
SLUCare	Patient Accounts	5 years	Insurance Claims
SLUCare	Patient Accounts	Completion of Annual Audit	Medicaid & Medicare Log
SLUCare	Patient Accounts	10 years or until a patient's 23rd birthday	Patient Account Files
SLUCare	Patient Accounts	Completion of Annual Audit	Petty Cash Receipts
SLUCare	Patient Accounts	Permanent	Transfer Log (Dismissals)
SLUCare	Pharmacy	Permanent	Chemotherapy Logs and Exposure Records
SLUCare	Pharmacy	Permanent	Controlled Substance Purchases
SLUCare	Pharmacy	Permanent	Dispensing and Administration Records for Controlled Substances
SLUCare	Pharmacy	5 years	Outpatient Prescriptions
SLUCare	Primary Care Records	10 years or until a patient's 23rd birthday	Primary Care (DOB) Records
SLUCare	Radiation Oncology	Permanent	Radiation Oncology Records
SLUCare	Radiology	10 years	Daily Log of Patient Exams
SLUCare	Radiology	Permanent	Procedure manual
SLUCare	Radiology	Permanent	Quality Control Records
SLUCare	Respiratory Therapy	3 years	Daily Rounds and Treatment

## **Appendix: FAQ (not part of policy)**

### **How are Primary Offices of Record selected?**

POR is normally one that is responsible for a category of Records that is handled by multiple Operational Units, is governed by regulations, or one that represents a significant component of University operations.

### **When there are multiple copies of a Record, which one is subject to the schedule?**

The Record Retention Schedule applies to all copies of a record. The designation of a particular copy or version as the “official record”, “designated record”, “legal record”, or any similar label does not signify any exemption from the Record Retention Schedule for any additional copies or versions.

### **How will the reviews be done?**

The POR and OU are expected to allocate the necessary personnel time and resources to execute these duties each year. It is suggested that each unit identify a point of contact for ensuring that this completed and documented.

### **Are there any qualifications for a document to be a record other than the definition in section II?**

A Record’s status is regardless of where and how the information is stored