



### **2.2.7 Record Retention Policy**

The University of San Diego is committed to effective record retention to comply with applicable law, to preserve its history, to optimize the use of space, and to ensure that university records that are no longer needed are properly discarded.

This policy sets forth the standards and procedures that govern the retention of university records. For the purpose of this policy, a university record includes any record that is made, produced, executed or received by any department, office, or employee of the university in connection with the transaction of university business. This policy applies to all records without regard to format, and includes but is not limited to documents in paper, electronic, microform (e.g. microfilm, microfiche, magnetic tapes, and CD-ROMS), and other traditional media format.

Individual departments or units may establish appropriate procedures that are consistent with and in furtherance of this policy.

#### **Retention Periods**

Table A, attached hereto and incorporated herein by reference, identifies the minimum retention period for university records. Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation, or audit requirements. Any such modifications supersede the requirements identified in this policy.

Please note that no document list can be exhaustive. The minimum retention period for a university record not identified on Table A shall be the retention period required by applicable law. Questions regarding the retention period for any specific document or class of documents not included in Table A should be addressed to the Office of the General Counsel.

#### **Disposal of University Records**

University records may be discarded once the minimum retention period is reached, provided that (1) the disposal of the records complies with all legal, contractual or accreditation obligations; (2) the records to be disposed of do not relate to or contain information regarding a current, pending, or known potential litigation, investigation, or audit involving the university; and (3) records containing student information, employee personnel information, or sensitive and/or confidential information are shredded or otherwise rendered unreadable prior to disposal.

A vice president, dean, or department head is responsible for ensuring that university records in his or her unit or department are retained or disposed of in a manner consistent with this policy.

(Effective February 25, 2009)

TYPE OF RECORD	RETENTION PERIOD
<b>Academic and Other Student Records</b>	
Academic action authorizations (dismissal, etc.)	7 years after graduation or last date of attendance
Academic records (including narrative evaluations, competency assessments, etc.)	Transcripts are retained permanently. Other records are retained for 7 years after graduation or last date of attendance.
Advanced placement and other placement tests	7 years after graduation or last date of attendance
Applications for graduation	7 years after graduation or last date of attendance
Audit authorizations	3 semesters after date submitted
Changes of course (add/drop)	3 semesters after date submitted
Changes of grade forms (update documents)	Permanent
Class lists (original grade sheets)	Permanent
Class schedules (for students)	Permanent (on transcript)
Correspondence, relevant	7 years after graduation or last date of attendance
Credit by examination reports/scores (e.g. Advanced Placement, CLEP, PEP)	Permanent (transferable credit appears on transcript)
Credit/no credit approvals (audit, pass/fail, etc.)	3 semesters after date submitted
Curriculum change authorizations	7 years after graduation or last date of attendance
Degree audit records	7 years after graduation or last date of attendance
Disciplinary files	7 years after graduation or last date of attendance (where the sanction included university probation, suspension, or removal from university housing) Permanent (where the sanction included expulsion or withdrawal pending a disciplinary action) 1 year after graduation or last date of attendance (where the sanction did not include expulsion, university probation, suspension, removal from university housing, or withdrawal pending a disciplinary action)
FERPA requests	7 years after graduation or last date of attendance

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>
Grade reports	1 year after date distributed
Graduation lists	Permanent
Hold or encumbrance authorizations	Until released
Military documents	Permanent
Name change authorizations	7 years after graduation or last date of attendance
Pass/fail request	3 semesters after date submitted
Personal data information forms	7 years after graduation or last date of attendance
Registration forms	3 semesters after date submitted
Student health records (student health center, counseling center, disability services)	7 years after graduation or last date of attendance
Student-athlete medical records (maintained by the Department of Athletics)	7 years after last date of participation
Substitution waiver records	7 years after graduation or last date of attendance
Transcripts	Permanent
Transcript requests	7 years after graduation or last date of attendance
Transfer credit evaluations	7 years after graduation or last date of attendance
Tuition charges, fee charges, and refunds	7 years after graduation or last date of attendance
Withdrawal and leave of absence records	7 years after graduation or last date of attendance
<b>Admissions Records For Applicants Who Do Not Enroll</b>	
Acceptance letters	18 months from the date of start of application term
Applications	18 months from the date of start of application term
Correspondence	18 months from the date of start of application term
Entrance exams and placement scores	18 months from the date of start of application term
Letters of recommendation	18 months from the date of start of application term
Transcripts	18 months from the date of start of application term

<b>Admissions Records for Applicants Who Enroll</b>	
Acceptance letters	7 years after graduation or last date of attendance
Applications	7 years after graduation or last date of attendance
Entrance exams and placement scores	7 years after graduation or last date of attendance
Letters of recommendation	7 years after graduation or last date of attendance
Transcripts (from institutions other than USD)	7 years after graduation or last date of attendance
<b>Corporate Records</b>	
Articles of Incorporation and any amendments	Permanent
Accreditation records	Permanent
Board of Trustee meeting notices, agendas, minutes, membership lists, resolutions, completed conflict of interest forms	Permanent
Board of Trustee committee meeting notices, agendas, minutes	Permanent
Institutional policies and manuals	Permanent
Merger documents	Permanent
Mission statement and strategic plan	Permanent
<b>Faculty</b>	
Application materials for individuals not hired (resumes, letters of recommendation, search committee records)	2 years after position is filled
Application materials for individuals hired (resumes, letters of recommendation)	7 years after last date of employment
Complaints, grievances, investigations and findings	7 years after last date of employment
Letters regarding appointment, reappointment, promotion, tenure	7 years after last date of employment
Performance evaluations	7 years after last date of employment
Personnel files	7 years after last date of employment
Rank and tenure files	7 years after last date of employment

<b>Finance and Accounting</b>	
Accounts payable (statements, ledgers, invoices, purchase requisitions, purchase orders, payment/disbursement records, expense reports, insurance payments, Form 1099s, petty cash reports, procurement card reports)	7 years
Audit reports	Permanent
Bank statements and deposit slips (custodial accounts, investment reports, etc.)	7 years
Budget appropriations	3 years
Budget books and worksheets	3 years
Cash receipts	5 years
Checks	7 years
Conflict of interest disclosure forms	7 years
Contracts	7 years after expiration or termination
Expense reports	7 years
Financial statements (audited)	Permanent
General ledgers	7 years
Investment reports	7 years
IRS determination letter	Permanent
Journal entries and AJE's	7 years
Leases, agreements, and other contracts	Term plus 5 years
Reconciliation	7 years
Sales tax records	7 years
Stock gift records	7 years
Support for endowment contributions	Permanent
Federal, state and local tax returns	7 years
Unclaimed property records	7 years
<b>Financial Aid/Loan Administration</b>	
Applications for financial aid	5 years from date of graduation or last date of attendance
Financial aid individual records	5 years from date of graduation or last date of attendance
Financial aid program records	5 years from the end of the award year for which the record was submitted or created
Job placement	5 years from date of graduation or last date of attendance
Lender's name and address	5 years from date of graduation or last date of attendance
Promissory notes	3 years after outstanding loan(s) are paid in full

Repayment history	3 years after outstanding loan(s) are paid in full
<b>Foreign Visitors</b>	
Foreign student or scholar (J and F) files	3 years after last date of attendance
Other foreign worker (H, O, P, PR, etc.) files	7 years after last date of employment
<b>Human Resources</b>	
Application materials for individuals not hired (applications, resumes, letters of recommendation, background investigation results, search committee records)	2 years after position is filled
Application materials for individuals hired (applications, resumes, letters of recommendation, background investigation results, medical examinations)	7 years after last date of employment
Beneficiary designation	7 years after last date of employment
Complaints, investigations, and findings	7 years after last date of employment
Disciplinary records	7 years after last date of employment
Emergency contacts	7 years after last date of employment
Employee personnel files	7 years after last date of employment
Employment history records	7 years after last date of employment
Individual contracts of employment	7 years after last date of employment
I-9 Forms	1 year after last date of employment or 3 years after date of hire, whichever is later
Leave of absence records	7 years after last date of employment
Medical records	7 years after last date of employment
Performance reviews	7 years after last date of employment
Personnel actions	7 years after last date of employment
Termination records	7 years after last date of employment

<b>Insurance and Risk Management</b>	
Certificates of insurance, indemnification agreements, hold harmless agreements, and other contracts	7 years after expiration
Insurance policies (liability, property, and other policies)	Permanent
Incident, accident and medical reports	7 years after report date
Insurance claim records	7 years after conclusion of claim
<b>Intellectual Property</b>	
Copyrights (applications, registrations)	Permanent
License agreements	7 years from expiration or termination of agreement
Patents (invention disclosure forms, assignments, filing papers, applications, original patents, correspondence papers)	Permanent
Royalty records	Life of copyright, trademark, patent, plus 7 years
Trademarks (applications, registrations)	Permanent
<b>Internal Audit</b>	
Audit reports and work papers	5 years
<b>Legal</b>	
Court orders	Permanent
Judgments	Permanent
Litigation records (e.g. deposition transcripts, discovery materials, court documents and records, litigation files)	5 years after conclusion of litigation
Settlement agreements and releases	Permanent
<b>Payroll</b>	
Garnishments	5 years
Information returns filed with federal or state authorities (e.g. W-2, 941, etc.)	5 years
Payroll deductions	5 years
Time records	5 years
Wage and earning records	5 years
<b>Public Safety</b>	
Accident reports	7 years after report date
Clery Act compliance records	7 years after report date
Crime reports	7 years after report date
Medical reports	7 years after report date
Parking citation records	3 years after date of citation
Property damage reports	7 years after report date



<b>Real Property and Construction</b>	
Property deeds, leases, title reports, easements, rights of first refusal, options to purchase, mortgages, remainder interests	Permanent
Title insurance policies	10 years after disposal of property
Property tax returns filed with taxing jurisdiction	Permanent
Building plans, blueprints, and design plans	Permanent
Contracts and agreements	10 years after completion of term and construction project
Licenses and permits	Permanent
Management engineering studies and reports	Permanent
<b>Research and Sponsored Programs</b>	
A-133 audits	Permanent
Animal research and welfare records	8 years after close of grant or contract
Grant and contract applications, proposals, awards, and other supporting documents	8 years after close of grant or contract
Institutional Review Board compliance records (agendas, minutes, proposals, correspondence, etc.)	8 years from the creation of the record or 8 years after the close of the matter considered, whichever is later
<b>Retirement Plan</b>	
Employee eligibility records	6 years after death of employee or beneficiary
Form 5500	Permanent
Individual employee pension and benefit files	6 years after death of employee or beneficiary
Retirement plans and summary plan descriptions	Permanent
Retirement plan enrollment records	6 years after death of employee or beneficiary
Retirement plan benefits accrued	6 years after death of employee or beneficiary
Retirement plan distribution records	6 years after death of employee or beneficiary
Retirement plan change records	6 years after death of employee or beneficiary
Salary reduction agreements	6 years after death of employee or beneficiary

<b>University Publications and Reports</b>	
Degree, grade, enrollment, and application statistics	Permanent
Bulletins and course catalogs	Permanent
Institutional newsletters or publications	Permanent
Student newspapers	Permanent
<b>University Relations</b>	
Alumni records	Permanent
Donor records	Permanent
Gift records	Permanent
<b>Workers' Compensation</b>	
Employee injury reports (not resulting in a claim)	7 years
Workers' compensation claim files	7 years after claim is closed