The University of San Francisco retains records for specific periods of time depending upon the type of records being retained, and has designated official repositories for their maintenance. These records must be managed in accordance with the procedures outlined below in order to ensure the University meets its legal obligations, optimizes the use of space, minimizes the cost of record retention, preserves the University's history, and destroys outdated and useless records.

This policy applies to paper records, records stored on hard disks, network servers, and backup tapes.

Following is a list of record categories and the official repository for their maintenance. Appendix A contains a guide to retention periods for specific record types.

<table>
<thead>
<tr>
<th>Record Category</th>
<th>Official Repository</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounting</td>
<td>Business &amp; Finance</td>
</tr>
<tr>
<td>Alumni records</td>
<td>Alumni Relations</td>
</tr>
<tr>
<td>Auditing</td>
<td>Internal Auditor</td>
</tr>
<tr>
<td>Board of Trustees</td>
<td>Corporation Secretary</td>
</tr>
<tr>
<td>Budgeting</td>
<td>Appropriate Schools, Colleges, Departments</td>
</tr>
<tr>
<td>Construction and renovation</td>
<td>Facilities Management</td>
</tr>
<tr>
<td>Environmental safety</td>
<td>Facilities Management</td>
</tr>
<tr>
<td>Gifts</td>
<td>University Advancement</td>
</tr>
<tr>
<td>Grants</td>
<td>Sponsored Projects</td>
</tr>
<tr>
<td>Historical records</td>
<td>University Archivist</td>
</tr>
<tr>
<td>Investments/endowment</td>
<td>Business &amp; Finance</td>
</tr>
<tr>
<td>Law enforcement</td>
<td>Public Safety</td>
</tr>
<tr>
<td>Personnel</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Public relations</td>
<td>Public Affairs</td>
</tr>
<tr>
<td>Real property</td>
<td>Business &amp; Finance</td>
</tr>
<tr>
<td>Student administration</td>
<td>University Registrar</td>
</tr>
<tr>
<td>Student life</td>
<td>University Life</td>
</tr>
</tbody>
</table>

When the prescribed retention period for official University records (Appendix A) has passed, a determination of whether to preserve or dispose of the documents must be made. If a particular record may be of historic value to the University, it should be discussed with the University Archivist who has authority to designate which records are archival.

If the determination is to dispose of the records, they may be destroyed as follows:

1. Non-confidential paper records may be recycled.
2. Confidential records must be shred or otherwise rendered unreadable.
3. Electronically stored records must be erased or destroyed.
Official repositories that use an outside party to dispose of records must conduct due diligence in hiring a document destruction contractor. Due diligence includes (i) reviewing an independent audit of a contractor’s operations and/or its compliance with this rule; (ii) obtaining information about the contractor from several references; (iii) requiring that the contractor be certified by a recognized trade association; and (iv) reviewing and evaluating the disposal company’s information security policies or procedures.

Departments that are not official repositories and that retain duplicate or multiple copies of University records should dispose of them in the prescribed manner when the records are no longer useful.

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. Suspension of record destruction required for any of these reasons will be accomplished by a notice sent out to affected units by the Office of the General Counsel, the Internal Audit Office, Business & Finance, or the Office of Sponsored Projects.

No document list can be exhaustive. Questions regarding the retention period for any specific record or class of records not included in Appendix A should be addressed to the Office of the General Counsel.

Approved OGC May 2009
Under review 2013
Appendix A

Non-Academic Records

<table>
<thead>
<tr>
<th>Record Description</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accident reports</td>
<td>4 years after report date</td>
</tr>
<tr>
<td>Account reconciliations (balance sheet)</td>
<td>6 Years</td>
</tr>
<tr>
<td>Accounting reports (monthly reports) Schedules of Department Balances, Transaction Statements, Account Analysis Statements, monthly and year-to-date salary and wage statements</td>
<td>6 Years</td>
</tr>
<tr>
<td>Accounts Payable Vouchers and attachments</td>
<td>6 Years</td>
</tr>
<tr>
<td>Accounts Receivable Statements, centrally generated</td>
<td>6 Years</td>
</tr>
<tr>
<td>Accounts Receivable Statements, unit generated</td>
<td>6 Years</td>
</tr>
<tr>
<td>Accreditation records</td>
<td>Permanent</td>
</tr>
<tr>
<td>Alumni records</td>
<td>Permanent</td>
</tr>
<tr>
<td>Annual Conflict of Interest Disclosure Statements</td>
<td>3 Years</td>
</tr>
<tr>
<td>Annual financial reports and work papers</td>
<td>Permanent</td>
</tr>
<tr>
<td>Annual payment records (W2, Alpha lists, employee transaction lists)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Banking records, including deposit and withdrawal records, bank statements and reconciliation, voided and canceled checks</td>
<td>6 Years</td>
</tr>
<tr>
<td>Billing records</td>
<td>6 Years</td>
</tr>
<tr>
<td>Board of Trustee minutes</td>
<td>Permanent</td>
</tr>
<tr>
<td>Bylaws</td>
<td>Permanent</td>
</tr>
<tr>
<td>Capital equipment records</td>
<td>Life of asset: records of equipment purchased on federal funds must be retained for three years after final disposition</td>
</tr>
<tr>
<td>Cash receipts</td>
<td>6 Years</td>
</tr>
<tr>
<td>Cause findings, Permanent</td>
<td>See Human Resources section</td>
</tr>
<tr>
<td>Information Type</td>
<td>Retention Period</td>
</tr>
<tr>
<td>--------------------------------------------------------------------------------</td>
<td>----------------------------------------</td>
</tr>
<tr>
<td>Certificates of insurance, indemnification agreements, hold-harmless agreements</td>
<td>6 years after expiration</td>
</tr>
<tr>
<td>agreements, and contracts</td>
<td></td>
</tr>
<tr>
<td>Crime reports</td>
<td>4 years after report date</td>
</tr>
<tr>
<td>Depreciation records</td>
<td>Life of Asset</td>
</tr>
<tr>
<td>Depreciation schedules</td>
<td></td>
</tr>
<tr>
<td>Documents for leases, licenses, construction contracts and other contracts of a</td>
<td>6 years after expiration of lease or</td>
</tr>
<tr>
<td>temporary nature, valued at less than $50,000</td>
<td>contract term</td>
</tr>
<tr>
<td>Effort Certifications</td>
<td>6 Years</td>
</tr>
<tr>
<td>Employee personnel files (including application, resume, payroll, appointment/sal</td>
<td>6 years after termination</td>
</tr>
<tr>
<td>ary forms)</td>
<td></td>
</tr>
<tr>
<td>Excise tax returns</td>
<td>6 Years</td>
</tr>
<tr>
<td>Federal reporting requirements: welfare benefits and other fringe benefit plans</td>
<td>Permanent</td>
</tr>
<tr>
<td>(i.e., 5500-s)</td>
<td></td>
</tr>
<tr>
<td>Gift records</td>
<td>6 years for hard copy records,</td>
</tr>
<tr>
<td></td>
<td>permanent for electronic records</td>
</tr>
<tr>
<td>Grievances</td>
<td>No cause findings: 3 years from</td>
</tr>
<tr>
<td></td>
<td>determination</td>
</tr>
<tr>
<td>I-9 Forms (faculty and staff)</td>
<td>3 Years, or 1 year after termination</td>
</tr>
<tr>
<td></td>
<td>(whichever is greater)</td>
</tr>
<tr>
<td>I-9 Forms (students)</td>
<td>3 Years, or 1 year after termination</td>
</tr>
<tr>
<td></td>
<td>(whichever is greater)</td>
</tr>
<tr>
<td>Imputed income records (auto usage, CCTS)</td>
<td>6 years</td>
</tr>
<tr>
<td>Incident Reports, Accident Reports</td>
<td>4 years after report date</td>
</tr>
<tr>
<td>Income tax returns</td>
<td>Permanent</td>
</tr>
<tr>
<td>Indirect Cost Rate Calculations</td>
<td>6 Years</td>
</tr>
<tr>
<td>Individual contracts of employment</td>
<td>6 years after termination</td>
</tr>
<tr>
<td>Information returns (990, 1099, 8282, 90.22, etc.)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Information returns filed with federal and state authorities (W-2, 941, 1042S,</td>
<td>6 years</td>
</tr>
<tr>
<td>etc.)</td>
<td></td>
</tr>
<tr>
<td>Insurance policies (liability, property, and other)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Policies</td>
<td>Retention Period</td>
</tr>
<tr>
<td>----------</td>
<td>----------------</td>
</tr>
<tr>
<td>Inventories</td>
<td>Life of Asset</td>
</tr>
<tr>
<td>Journal entries and back-up documentation</td>
<td>6 Years</td>
</tr>
<tr>
<td>Leave-reporting documents</td>
<td>4 years</td>
</tr>
<tr>
<td>New account records and back-up documentation</td>
<td>6 years after account closing</td>
</tr>
<tr>
<td>Occupational injury or illness, Records relating to</td>
<td>5 Years</td>
</tr>
<tr>
<td>Original gift letter agreements, signed by the President and the donor</td>
<td>Permanent</td>
</tr>
<tr>
<td>Original gift letter agreements, all others</td>
<td>Permanent</td>
</tr>
<tr>
<td>Payroll deduction authorization forms (W4, DBD, CFCU, Bonds)</td>
<td>5 years after employment ends</td>
</tr>
<tr>
<td>Payroll vouchers</td>
<td>3 years</td>
</tr>
<tr>
<td>Performance appraisals</td>
<td>3 years after separation</td>
</tr>
<tr>
<td>Planned gifts (trusts, life income, agreements, annuities), real estate gifts</td>
<td>Permanent</td>
</tr>
<tr>
<td>Procurement card charge documentation</td>
<td>6 Years</td>
</tr>
<tr>
<td>Property damage reports</td>
<td>4 years after report date</td>
</tr>
<tr>
<td>Property deeds, easements, licenses, rights of way, leases, rights of first refusal, remainder interests, mortgages</td>
<td>Permanent</td>
</tr>
<tr>
<td>Property tax returns filed with taxing jurisdiction</td>
<td>6 Years</td>
</tr>
<tr>
<td>Record of payments and deductions (payroll registers, deductions lists, adjustments)</td>
<td>5 years</td>
</tr>
<tr>
<td>Sales tax returns</td>
<td>6 Years</td>
</tr>
<tr>
<td>Search committee records, including employment applications, resumes, and all applicant search materials</td>
<td>3 Years</td>
</tr>
<tr>
<td>Subsidiary ledgers (accounts payable, accounts receivable, etc.)</td>
<td>6 Years</td>
</tr>
<tr>
<td>Summary Analysis Reports, end of year (fund, source, function)</td>
<td>6 Years</td>
</tr>
<tr>
<td>Tenure or promotion dossiers</td>
<td>If action approved, 3 years; If tenure denied, 3 years from end of term appointment</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>----------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Time cards, student</td>
<td>3 years after the date that all student loans are paid</td>
</tr>
<tr>
<td>Time cards, other</td>
<td>3 years</td>
</tr>
<tr>
<td>Title insurance policies</td>
<td>10 years after disposal of property</td>
</tr>
<tr>
<td>Transaction Authority cards</td>
<td>6 Years</td>
</tr>
<tr>
<td>Travel Reimbursements and attachments</td>
<td>6 Years</td>
</tr>
<tr>
<td>Trial Balances</td>
<td>6 Years</td>
</tr>
<tr>
<td>Trustee decisions</td>
<td>Permanent</td>
</tr>
<tr>
<td>Union agreements</td>
<td>Permanent</td>
</tr>
<tr>
<td>University Audit work papers</td>
<td>6 Years</td>
</tr>
<tr>
<td>Volunteer registration forms, parental consent forms, and agreements</td>
<td>3 Years</td>
</tr>
<tr>
<td>Wage assignment orders</td>
<td>5 years after closed</td>
</tr>
<tr>
<td>Workers' compensation claims and insurance policies</td>
<td>18 Years</td>
</tr>
<tr>
<td>Academic-Student</td>
<td>5 years from graduation or date of last attendance</td>
</tr>
<tr>
<td>------------------------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Academic actions (dismissal, etc.)</td>
<td></td>
</tr>
<tr>
<td>Academic integrity code violations (findings of violation and related case files)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Academic records (including narrative evaluations, competency assessments, etc.)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Advanced placement records, applications for admission or readmission, correspondence that is relevant, entrance exam reports</td>
<td>5 years from graduation or date of last attendance</td>
</tr>
<tr>
<td>Catalogs</td>
<td>Permanent</td>
</tr>
<tr>
<td>Change of Grade forms</td>
<td>Permanent</td>
</tr>
<tr>
<td>Change to Student ID number</td>
<td>Permanent</td>
</tr>
<tr>
<td>Class lists (original)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Consent to Release Personally Identifiable Information (requests for non-disclosure)</td>
<td>Kept until next academic year; signatures kept 5 years</td>
</tr>
<tr>
<td>Course offerings</td>
<td>Permanent</td>
</tr>
<tr>
<td>Curriculum Change Authorizations</td>
<td>5 years from graduation or date of last attendance</td>
</tr>
<tr>
<td>Degree, grade, enrollment, and racial/ethnic statistics</td>
<td>Permanent</td>
</tr>
<tr>
<td>Disciplinary records (findings of violation and related case files)</td>
<td>Permanent where penalty imposed is probation, suspension or expulsion (dismissal); otherwise in accordance with the record retention policy of the Office of Student Conduct</td>
</tr>
<tr>
<td>Enrollment Verifications</td>
<td>1 year from enrollment date</td>
</tr>
<tr>
<td>Financial aid records (applicants who do not enroll)</td>
<td>3 years from date of graduation</td>
</tr>
<tr>
<td>Financial aid records (applicants who enroll)</td>
<td>5 years from graduation date</td>
</tr>
<tr>
<td>Grade sheets</td>
<td>Permanent</td>
</tr>
<tr>
<td>Graduation lists</td>
<td>Permanent</td>
</tr>
<tr>
<td>Hold or Encumbrance Authorizations</td>
<td>Until released</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>------------------------------</td>
</tr>
<tr>
<td>International student forms (visa documentation, etc.)</td>
<td>5 Years</td>
</tr>
<tr>
<td>Letters of recommendation</td>
<td>Until date of admission</td>
</tr>
<tr>
<td>Name changes</td>
<td>Permanent</td>
</tr>
<tr>
<td>Original grade sheets</td>
<td>Permanent</td>
</tr>
<tr>
<td>Recruitment materials</td>
<td>Until date of enrollment</td>
</tr>
<tr>
<td>Residency certificates</td>
<td>Until date of enrollment</td>
</tr>
<tr>
<td>Schedule of classes (institutional)</td>
<td>Permanent</td>
</tr>
<tr>
<td>Student class schedules</td>
<td>1 year from graduation date or date of last attendance</td>
</tr>
<tr>
<td>Term reports</td>
<td>5-7 Years</td>
</tr>
<tr>
<td>Transcript requests</td>
<td>1 year from submission date</td>
</tr>
<tr>
<td>Transcripts</td>
<td>Permanent</td>
</tr>
<tr>
<td>Transcripts — high school and other college</td>
<td>5 years from graduation or date of last attendance</td>
</tr>
<tr>
<td>Transfer Credit Evaluations</td>
<td>5 years from graduation</td>
</tr>
<tr>
<td>Veteran Administration Certifications</td>
<td>5 years from graduation or date of last attendance</td>
</tr>
<tr>
<td>Withdrawal Authorizations/Leaves of Absence</td>
<td>2 Years</td>
</tr>
</tbody>
</table>