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| System-wide Policy: FI0120 - Records Management | |
| Version: 11 | Effective Date: 10/01/2017 |

FI0120 – Records Management

Topics:

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| General Policies | Procedures |
| Confidential Records | Forms |
| Electronic Recordkeeping | Contacts |
| Disposal of Records | Related Policies |
| Minimum Retention Periods For University Records | |

Objective:

To provide guidance for identifying, maintaining, preserving and destroying university records while complying with applicable laws and regulations.

Policy:

General Policies

1. All records created or received, by departments are the property of the university and must be retained and disposed of in accordance with this policy. No university record may be disposed of until the minimum retention period has elapsed. Retention periods should include time maintained in the department combined with retention in a university storage facility or computer system.
2. Records mean all documents, papers, letters, maps, books, photographs, microfilms, electronic media, or other digital format.
3. All university records must be maintained in a manner that provides the following: (1) Access for authorized faculty and staff to carry out their normal job responsibilities and (2) Reasonable protection against misplacement, loss, destruction, or theft.
4. Unless authorized by the campus/institute Chief Business Officer or Chief Financial Officer, university records must be stored on the premises or an approved off-site storage facility at all times. If records are loaned to other

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departments or university employees, the department should document the loan (i.e., describe the records, and the dates of loan and the name of the borrowing department, and requestor).

5. Records should be maintained in a secure environment that is free from vermin, flooding, fire hazards, and unusual amounts of moisture, heat, and dust.

Confidential Records

6. Many university records contain confidential information such as social security numbers, credit card information and bank account data. Furthermore, state and federal laws such as the Family Rights and Privacy Act, the Health Insurance Portability and Accountability Act, and the Gramm-Leach-Bliley Act require that various confidential records be protected from unauthorized access. Departments must implement practices that protects confidential information contained in university records in accordance with relevant laws and the University's Information Technology Policy. Such protections must be applied in maintaining paper records, electronic records, stored and archived records and in the destruction of records.
7. Records containing social security numbers, credit card numbers, medical information or other sensitive information should not be stored electronically outside of one of the major computer systems, unless approval has been obtained by the campus/institute information security officials.

Electronic Recordkeeping

8. Whenever possible, any paper records should be scanned and uploaded to one of the university's centrally managed enterprise-wide computer systems. Electronic documents saved in one of these systems are considered original records and the paper versions are considered copies for purposes of this policy and the record retention periods. Departments should ensure that information from the paper version has been properly imaged and saved in the system before destroying it. These systems are scheduled for frequent back-ups, are protected by computer security experts and provide easy access to all authorized

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university personnel. They also reduce filing and storing requirements in the department. The university's major computer systems include:

- a. IRIS - Financial and human resources system
 - b. ANDI - Fundraising
 - c. Taleo - Employee recruitment
 - d. E-Visions - Sponsored programs and award
 - e. ESM - Procurement and UT Marketplace system
 - f. Other campus systems including:
 - i. ARCHIBUS - Facilities management systems
 - ii. Banner - Student Systems
 - iii. Systems approved by the campus/institute information technology departments.
9. Departments storing records in an electronic format outside of one of these systems must ensure that the records stored are readable, easily retrievable, and are stored on university servers that are properly backed-up with adequate security measures. These records should not be solely stored on devices that are easily removable.
10. All records stored electronically, including the records on enterprise-wide systems must comply with all university Information Technology Policies.
11. Departments should establish and apply retention schedules for records in their custody that are not covered by this policy.

Disposal of Records

12. University records (regardless of the storage medium) may be disposed of provided that the minimum retention period stated below has elapsed and the department does not need the records for future administrative, legal, research/historical, or fiscal purposes.
13. No documents should be destroyed during the pendency of threatened or active litigation, when a litigation hold has been issued by the Office of General Counsel or if any pending or actual federal, state or other audit is being conducted.

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- 14. The department head (or designee) is responsible for performing, at least annually, a review to determine the value or usefulness of the department's records. During this review, the department head (or designee) should identify all records that have met their relevant retention period (time in office plus time in storage) and are no longer needed for any purpose identified in this policy. He/she must designate each record as either an historical document to be transferred to University Archives or a document ready for destruction.
- 15. The department head is responsible for authorizing the disposal of records. When the disposition is authorized, records containing social security numbers, credit card numbers, medical information or other sensitive information should be shredded or sanitized and not recycled. Records that do not have to be destroyed may be recycled if services are available.
- 16. Records stored on computers, jump drives, CDs, etc, should be destroyed in a manner consistent with media sanitization methods. Campus information technology and/or surplus property departments can provide assistance on these methods.

Minimum Retention Periods for University Records

- 17. The minimum retention periods for most records are specified below. Individuals in the responsible office (official repository) who are responsible for the records specified in this policy must comply with all applicable laws and external agency regulations that may supersede the minimum retention periods in this policy. Questions concerning the minimum retention period for records not listed below should be addressed to the campus/institute Records Management office or the Chief Business Officer. In the following retention schedule, the responsible office must hold the official record or series of records for the stated time period.

NOTE: For records associated with sponsored projects, The Responsible Office (as stated in the chart below) must comply with the sponsor's requirements for the destruction of the source documentation, unless the university's retention period is greater.

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| Business and Finance | | |
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| Document (Includes paper and electronic media) | Responsible Office | Minimum Retention Period |
| Accounts Payable - Invoices Processed Centrally | Treasurer's Office | 6 years after payment |
| Accounts Receivable and Supporting Documentation (includes customer account information, credit applications, fiscal year-end aging, returned check files, and other correspondence) | Department | 6 years |
| Annual Report of the Treasurer | Treasurer's Office | Permanently |
| Assignment Records for Dormitories | Housing | 6 years |
| Audit Reports - External | Department Audited | 12 years |
| Audit Reports - Internal | Internal Audit | 10 years |
| Audit Reports - Internal Investigation | Internal Audit | Permanently |
| Bank Statements and supporting documents including reconcilements, deposit slips, canceled checks and check register | Department | 6 years |
| Budget Material - Campus | Business Office | 10 years |
| Budget Materials - Official UT Budget | Treasurer's Office | Permanently |
| Capital Agreements (Construction/Renovation) | Treasurer's Office | Permanently |
| Cash Vouchers (CV's) | Bursar's Office | 6 years |
| Claim Files | Risk Management | 10 years |
| Collection Records ["ZK" document type or Report of Departmental Collections (Form T-33)] | Department | 6 years |
| Concession Sales Records | Department | 6 years |

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| Conference Rosters | Department | 6 years |
| Contracts, Copies | Department | 1 year after end of contract |
| Contracts, Originals | Treasurer's Office | 6 years after termination |
| Deeds | Treasurer's Office | Permanently |
| Effort Certification Records | Treasurer's Office | 6 years |
| Endowment and Living Trust Agreements | Treasurer's Office | Permanently |
| Equipment over \$50,000 | Purchasing | 6 years after equipment retires |
| Expenditure documents attached in IRIS. Including invoices, miscellaneous reimbursements, credit memos, moving allowances documents, travel expenses, conference registrations, T-27s, T-29s and internal transfers. | Treasurer's Office | 6 years after payment |
| Copies of expenditure documents attached in IRIS. Including invoices, miscellaneous reimbursements, credit memos, moving allowances documents, travel expenses, conference registrations, T-27s, T-29s and internal transfers. | Department | May be destroyed after ledger reconciliation |
| Facilities and Administrative Cost (formerly Indirect Cost) Study-Reports and Worksheets | Treasurer's Office | 6 years |
| Financial Statements | Treasurer's Office | 6 years |
| Housing Contracts | Housing Office | 6 years after payment final payment or termination of the contract |
| Incident Reports | Risk Management | 10 years |

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| Internal Transfer (formerly Transfer Voucher) Supporting Documentation ("ZD" or "ZE" document type) | Originating Department | 6 years |
| Inventory Records | Department | 6 years |
| Investment Records (includes trade tickets, broker statements, and general correspondence) | Treasurer's Office | 6 years |
| Journal Voucher/Entry and SA Supporting Documentation | Treasurer's Office | 6 years |
| Leases | Capital Projects | 6 years after either final payment or termination of contract term |
| Ledgers (reconciled and reviewed) | Department | 1 year |
| Minutes of Boards and Committees | General Counsel | Permanently |
| Mortgages/Debit Payment | Treasurer's Office | Permanently |
| Petty Cash - Receipts, duplicates (Form T-4) | Department | 6 years |
| Policies and Procedures | Treasurer's Office | Maintain until superseded or obsolete |
| Procurement Credit Card Statements | Department | 6 years |
| Procurement Credit Cards Receipts and Supporting Documents | Department | 6 years |
| Purchasing - Purchase Orders, Bid Documentation, Requisitions, Framework Purchase Orders, RFP, RFQ, Specifications, Bid Documentation, and Justification for Non-Competitive Purchases and Contracts forms | Purchasing Office | 6 years after either final payment or termination of purchase order |
| Receipts for Funds Collected including - Cash Register Tapes, Readings, and Reports | Department | 6 years |
| Sales and Use Tax Records | Department | 6 years |

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| Sales Tax Exemption Certificates | Department | 3 years |
| School Bond Authority Agreements | Treasurer's Office | Permanently |
| Service Center Rate Determination & Charges Backup | Department | Maintain until superseded |
| Surplus Sales Records | Campus Surplus Property | 6 years after the sale |
| Surplus – Forms | Campus Surplus Property & Originating Department | 6 years |
| Tickets, Ticket Stubs, and Reconcilements | Department | 1 year |
| Vendor Request Documents, including W-9s | Treasurer's Office | Permanently |
| Workers' Compensation Records | Risk Management | 5 years following end of year in which injury occurred, except when legal action is pending |

Employee Records

| Document | Responsible Office | Minimum Retention Period |
|--|--------------------|---|
| Additional Pay Form | Treasurer's Office | Permanently |
| Applicant Statistics by Job Vacancy (name, sex, race, qualifications etc.) | Human Resource | 10 years |
| Direct Deposit Forms | Treasurer's Office | 6 years after participation is terminated |

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| Employee Earnings Records | Treasurer's Office | Permanently |
| Employment Applications | Human Resources | 5 years |
| Employment Eligibility Verification (Form I-9) | Human Resources | Permanently |
| Flexible Benefits and Child Care Reimbursement Requests | University's Flexible Benefits Provider | 6 years |
| FMLA Documents | Human Resources | 5 years |
| Leave Records | Treasurer's Office | Permanently |
| Non-Exempt (Monthly and Biweekly) Time Records | Department | 3 years |
| Payroll and Check Registers | Department | 1 year |
| Payroll Deduction Cards | Campus Payroll Offices | 3 years |
| Payroll Reduction Agreements | Benefits and Retirement Services | 3 years |
| Personnel Files | Human Resources | Permanently |
| Personnel Requisitions | Human Resources | 10 years |
| Retirement Records | Benefits and Retirement Services | Permanently |
| Return-to-work Releases and Working Restrictions | Department | 5 years |
| Search Files (faculty and exempt staff) | Department or Head of Search Committee | 5 years |
| Sick Leave Bank Requests | Sick Leave Bank Administrator | 5 years |
| W-4 Forms | Payroll Offices | 4 years |

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| Student Records | | |
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| Document | Responsible Office | Minimum Retention Period |
| Academic Records | Registrar | Permanently |
| Academic Second Opportunity Applications | Registrar | 10 years |
| Admission Correspondence | Admissions | 3 years |
| Admissions - completed international files | Admissions | 5 years after graduation or date of last attendance |
| Advising Records | Advising Department | 6 years from graduation or from date of last interaction |
| All records involved in any loan, claim, or expenditure questioned by a Title IV, HEA program audit, program review, investigation, or other review | Financial Aid | The later of (a) the resolution of that questioned loan, claim, or expenditure or (b) the end of the retention period applicable to the record. |
| Application - admitted and not enrolled | Admissions | 2 years after application term |
| Application for Diploma | Registrar | 1 year |
| Applications | Financial Aid | 3 years from end of award year |
| Applications - admitted and enrolled | Admissions | 5 years after graduation or date of last attendance |
| Applications - not admitted | Admissions | 2 years after application term |
| Athletic Files | Department | 10 years |
| Athletics Aid Files | Financial Aid | 5 years from end of award year the student last attended |
| Athletics Eligibility and Student Files, NCAA | Registrar | Permanently |

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| CEU's - Files – Non-credit courses (correspondence, catalogs, etc.) | Department | 3 years |
| CEU's - Information –Non-credit courses (Rosters, payments, etc.) | Department | 7 years unless longer by contract of governing body |
| Changes of Registration Forms (e.g., drop/add rolls, wp/wf forms) | Registrar | 1 year |
| Correspondence (enrollment and degree verification) | Registrar | 5 years after graduation or date of last attendance |
| Correspondence Grade Cards (courses taken through distance education) | Registrar | Permanently |
| Family Educational Rights and Privacy Act Documents (Academic Consent to Release) | Registrar | 1 year |
| FERPA Privacy/Directory Exclusion Forms | Registrar | Permanently |
| Final Grade Rolls | Registrar | Permanently |
| Financial Aid Transcripts | Financial Aid | 3 years from end of award year the student last attended |
| Fiscal Operations Report and Application to Participate (FISAP) in the Federal Perkins Loan, FSEOG, and FWS programs, and any records necessary to support the data contained in the FISAP, including the "income grid information" | Financial Aid | 3 years after the end of the award year in which the FISAP was submitted |
| Graduation Files | Registrar | Permanently |
| Health Professions Student Award Records | Financial Aid | 3 years from end of award year the student last attended |
| Incomplete application files | Admissions | 1 year after application term |
| Loan Deferment Certifications | Registrar | 1 year |
| Loans - Emergency Student Loan Agreements | Financial Aid | 5 years after repayment |

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| Loans - Guaranteed Student Loan Award Records | Financial Aid | 3 years from end of award year the student last attended |
| Loans - Health Education Assistance Loan Award | Financial Aid | 3 years from end of award year the student last attended |
| Loans - National Direct (Perkins) Loan Award Records | Student Loans | 3 years from date loan is assigned to the Department of Education, cancelled, or repaid |
| Loans - Nursing Student Loan Award Records | Student Loans | 3 years from end of award year the student last attended |
| Military Records | Registrar | 5 years after graduation or date of last attendance |
| Nursing Student Loan Award Records | Financial Aid | 5 years |
| Other records relating to the University's participation in the FFEL or Direct Loan Program | Financial Aid | 3 years after the end of the award year in which the records were submitted |
| Readmissions applications | Admissions | 5 years after graduation or date of last attendance |
| Records relating to a student or parent borrower's eligibility and participation in the FFEL or Direct Loan Program | Financial Aid | 3 years from the end of the award year in which the student last attended |
| Registration Exceptions (late drop/add approvals, etc) | Registrar | 1 year |
| Scholarships | Financial Aid | 5 years from end of award year the student last attended |
| SEOG, Pell Grant, Direct Student Loans, College Work Study Program, PLUS/SLS | Financial Aid | 3 years from end of award year |
| Supplemental Grade Changes | Registrar | Permanently |
| Transcript Requests | Registrar | 1 year |

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| Transcripts (high school and non-university) | Admissions | 5 years after application term |
| Veterans' Records | Registrar | 3 years |
| Withdrawal Authorization | Registrar | 2 years after graduation or date of last attendance |

Transportation and Traffic

| Document | Responsible Office | Minimum Retention Period |
|---|-----------------------|--------------------------|
| Motor Pool – Accident Reports Involving UT Vehicles | Campus Motor Pool | 6 years |
| Motor Pool - Support for Departmental Charges | Preparing Office | 6 years |
| Motor Pool - Authorizations to Drive UT Vehicles | Campus Motor Pool | 1 year |
| Motor Pool - Depreciation Schedules | Campus Motor Pool | 6 years |
| Motor Pool - Equipment Purchase Records | Campus Motor Pool | 6 years |
| Motor Pool - Expense Folders by UT Vehicle | Campus Motor Pool | 6 years |
| Motor Pool - Gasoline Tickets | Campus Motor Pool | 6 years |
| Motor Pool - Internal Transfer Documentation | Campus Motor Pool | 6 year |
| Parking - Registration Records | Campus Parking Office | 6 years after payment |

RESEARCH

| Document | Responsible Office | Minimum Retention Period |
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| Sponsored Project Files (Original) | Sponsored Projects Accounting or Post Award Office | 6 years after termination and review by sponsor or by the contract clause |
| Sponsored Project Files (Original Documentation to Support Costs) [includes: effort certification documentation, invoices to vendors, payroll activity, transfer vouchers, cash receipts, cost sharing documentation, budget activity, travel, procurement card activity, journal vouchers, petty cash, purchase requisitions, etc] | Department | 6 years after termination and review and review by sponsor or by the contract clause |
| Sponsored Project Proposals (Funded) | Research Office | 6 years after termination of project and review by sponsor |
| Institutional Review Board (IRB) Minutes and other records | Research Office | 3 years after completion of the study; *all consent forms for clinical trials - 6 years after the date on which the subject signed the consent form containing a HIPAA authorization or the date when it was last in effect, whichever is later |
| Institutional Animal Care and Use Committees (IACUC) record (animal use protocols, meeting minutes, semi-annual program reviews and facility inspection records) | IACUC Office | The longer of 3 years or 3 years after the completion of IACUC protocol activities |
| IRB Study Records for all drug studies with an IND | HRRP/Research Office | 2 years after (1) date a marketing application is approved for the drug for the indication for which it is being investigated or (2) if no application is to be filed or if the application is not approved for such indication, the investigation is discontinued and FDA is notified |

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| Intellectual Property Documentation, Including All Documents Relating to the Application for and Granting of All University Copyrights, Patents, and Trademarks | Research Foundation | Permanently |
| Research Conflict of Interest | | 3 years from the date of close of the related awards, date of final expenditures report to Public Health Service, or government action related involving these records. |
| Export Control | Export Control Officer | 5 years after the end of the activity |
| Federal Grant Project Files | Business Office | 6 years after award end date |

Patients Records

| Record or Document (Includes all media types: paper, electronic, etc.) | Official Repository | Minimum Retention Period |
|--|---------------------|---|
| Patient Medical Records | Clinics | 10 years |
| Patient Dental Records | Clinics | 10 years |
| Patient Consent and Authorization Forms (Signed) | Clinics | 6 years |
| Medical Logs (include but not limited to, Patient Check In, Admissions, Discharge, Transport, Patient Photo, Patient Service, Expired Drug Disposal) | Clinics | 3 years |
| Clinical Trials Patient Records | Department | 2 years following the date a marketing application is approved; or after the investigation is discontinued and FDA is notified. |

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| Disclosure of Protected Health Information (PHI) (may include the following forms: Restriction Request Form, Request for Confidential Communications Regarding Medical Information, Request for Accounting of Disclosures, Accounting of Disclosures of PHI, other HIPAA Forms. | Clinics | Current fiscal year plus 6 years |
| Patient Need Risk Assessment-Screening Forms (Forms for patients that are accepted as a teaching case. Otherwise, forms go into the patient record and are retained for that length of time.) | Clinics | 1 year |
| Billing Detail (Provides itemized billing records for medical services rendered) | Clinics | 7 years |
| Vet Med Medical Records – Radiographs | Vet Med | 4 years |

PROCEDURES

To view links to campus policies and procedures, click here:

<https://policy.tennessee.edu/campus-policies-procedures/>

FORMS:

- [Records Request](#)

FOR MORE INFORMATION:

Debra Keck (865) 974-6328 dkeck@tennessee.edu

Related Policies: [FI0530 - Procurement Cards](#)