

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

FI0120 – Records Management

Topics:

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

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

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, electronical 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

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

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.

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

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.

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

Business and Finance		
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

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

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 the accounting system. 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 the accounting system. 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

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

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

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

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

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

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

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

Student Records		
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

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

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

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

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

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

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

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

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

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.
Disclosure of Protected Health Information (PHI) (may include the following forms: Restriction	Clinics	Current fiscal year plus 6 years

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

Request Form, Request for Confidential Communications Regarding Medical Information, Request for Accounting of Disclosures, Accounting of Disclosures of PHI, other HIPAA Forms.		
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](#)