
Records Management

This retention schedule is authorized under Policy 5.21 Records Management.

1. This policy applies to all employees of Emory University and Emory Healthcare, as well as contractors who conduct business for or on behalf of Emory, and those who create, receive, or retain University records. Any recorded information, regardless of media, characteristics, physical form, storage location, or means of transmission, is considered a record when it is relevant to Emory's legal obligations or business.
2. Each department or office will maintain and dispose of records in compliance with Emory's retention schedule. This schedule supersedes previously approved applicable schedules.
3. Records should not be maintained past the end of their stated retention unless involved in current litigation, investigation, or audit. All known audits, investigations, or court cases involving the listed records must be resolved before the records can be destroyed.
4. The retention schedule applies to all records, regardless of format. Records must be accessible throughout their retention period in analog or digital format.
5. Departments and offices will destroy records that have not been deemed permanent in the manner identified by the retention schedule. Confidential paper must be shredded; electronic records must be made unreadable by being overwritten or the storage media being physically destroyed. Record-keeping systems must be capable of the complete deletion of records; it is not sufficient to take information off-line.
6. Departments and offices will routinely transfer records with continuing and enduring value, as identified on the retention schedule, to the University Archives.
7. The heads of departments or offices are responsible for ensuring that procedures within their area of responsibility meet the requirements of Emory's records management program relative to record identification, control, maintenance, storage, and disposition. All employees are responsible for managing the records in their possession and in compliance with this schedule.

<i>Title</i>	Chemical and Hazardous Waste Disposal Records
<i>Description</i>	This series documents the receipt, shipment, and disposal of chemical material or hazardous waste. This series may include, but is not limited to chemical and waste inspection forms, drum packing sheets, Uniform Hazardous Waste Manifest forms (EPA 8700), vendor certificates of disposal, land disposal notifications, and waste disposal records.
<i>Retention</i>	Retain 3 years from end of calendar year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	40 CFR 262.23 (f)(4); Ga. Comp. R. & Regs. r. 391-3-11-.08 (3)(s1a); Ga. Comp. R. & Regs. r. 391-3-11-.08 (3)(s1b);

<i>Title</i>	Coding Manuals
<i>Description</i>	Complete guides to coding classification systems; provides an in-depth description of the classification system logic and structure
<i>Retention</i>	Retain six years from date materials were replaced or updated.
<i>Disposition</i>	Confidential destruction not required
<i>Citations</i>	

<i>Title</i>	Compliance Activity Reports
<i>Description</i>	Reports which generally summarize compliance activities to the Board of Directors or from the Compliance Liaisons to the Compliance Officer.
<i>Retention</i>	Retain six years from the date materials were replaced or updated.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	

Title Compliance Audit Records

Description A comprehensive review of Emory's adherence to regulatory guidelines. Audit reports evaluate the strength and thoroughness of compliance preparations, security policies, user access controls and risk management procedures over the course of a compliance audit

Retention Retain seven years after audit.

Disposition Confidential destruction required

Citations

Title Compliance Inquiries Records

Description Inquiry submitted in writing relative to compliance with a particular policy, regulation or law

Retention Retain 7 years after inquiry is addressed or processed

Disposition Confidential destruction required

Citations 42 CFR 93.317 (b);

Title Compliance Investigations Records

Description Independent review or examination of compliance records

Retention Retain 7 years after investigation is complete

Disposition Confidential destruction required

Citations 42 CFR 93.317 (b);

Title Compliance Log

Description Hotline calls reporting occurrences (retired logs).

Retention Retain six years after the last date of entry.

Disposition Confidential destruction required

Citations

Title Compliance Manual

Description Publication of operational policies and procedures that must be adhered to

Retention Retain six years after superseded.

Disposition Confidential destruction required

Citations

Title Compliance Records

Description Records that document the rules or guidelines put in place in units to ensure compliance within their field. File may include correspondence, policies and procedures, reports, reviews, and other related records.

Retention Retain five years after administratively useful.

Disposition Confidential destruction required

Citations

Title Contributor Records

Description Records showing the contributions of one to an Organization

Retention If there is a condition attached to the contribution then retain permanently; otherwise, retain six years after the date of filing for tax audits.

Disposition Confidential destruction required

Citations 26 USCS 6501 (a); 26 USCS 6501 (c)(10); 26 USCS 6501 (e)(1)(A);

Title Environmental Health and Safety Training Records

Description This series documents employee training and certification for equipment operation, hazardous material handling and emergency procedures, driver training, CPR and first aid training, and asbestos awareness training for removal, abatement, or transportation. This series may include, but is not limited to sign off sheets, indicating that employees have received training and instruction sheets.

Retention Retain 3 years from end of academic year.

Disposition Confidential destruction required

Citations

Title Environmental Regulation Reports

Description This series documents compliance with environmental laws and guidelines set by federal, state, or local government, such as the regional air pollution authority, Environmental Protection Agency (EPA), and Georgia Environmental Protection Division. This series may include, but is not limited to Title V air discharge permits and air quality reports; waste water discharge applications and permits; water quality reports; and notices of violation and non-compliance.

Retention Permanent

Disposition Records are ineligible for destruction and ineligible for transfer to University Archives.

Citations

Title Hazardous Materials

Description This series documents off-site shipping of hazardous materials.

Retention Retain 3 years after material has been removed from site.

Disposition Confidential destruction required

Citations

Title HIPAA Compliance Records

Description Records showing compliance with the HIPAA Privacy Rule, which establishes national standards to protect individuals' medical records and other individually identifiable health information.

Retention Retain 3 years after material has been removed from site.

Disposition Confidential destruction required

Citations

Title Insurance Fund Claims

Description Records that document requests for payment of insurance claims. Records may include auto/liability/ property claim reports, estimates of repairs, accident reports, police reports, correspondence, and other related records.

Retention Retain five years after claim paid or denied.

Disposition Confidential destruction required

Citations O.C.G.A. 9-3-31; O.C.G.A. 9-3-32; O.C.G.A. 9-3-33 (s1a); O.C.G.A. 9-3-33 (s1b); O.C.G.A. 9-3-33 (s1c);

<i>Title</i>	Material Safety Data Sheet Records
<i>Description</i>	This series documents the university's hazardous chemicals as mandated by the Hazardous Communications Program of the Occupational Safety and Health Administration (OSHA). This series may include, but is not limited to safety data sheets, which list chemical name, description, composition, intended use, flash point, transportation, hazards, safe handling, and extinguishing methods.
<i>Retention</i>	Retain 30 years from end of academic year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1910.1020 (d)(1)(ii)(B),(iii);
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<i>Title</i>	MDR Reportable Events
<i>Description</i>	Requirements for reporting medical device problems, including malfunctions and adverse events
<i>Retention</i>	Retain ten years after date of event.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	21 CFR 803.18 (c); 21 CFR 803.18 (c),(d)(2)(S1); 21 CFR 803.18 (c),(d)(2)(S2);
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<i>Title</i>	Medical Device Tracking Records
<i>Description</i>	Records used to track certain devices from the manufacture through the distribution chain to implement a tracking system for a certain type of device.
<i>Retention</i>	Retain records for the useful life of each tracked device manufacture or distribute.
<i>Disposition</i>	Confidential destruction required.
<i>Citations</i>	21 CFR 821.60;

<i>Title</i>	Medical Waste Manifests
<i>Description</i>	Manifests or a subject of waste that is a subset of wastes generated
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction and ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-4-.06 (3)(d)(12);
<i>Title</i>	Minors on Campus Records
<i>Description</i>	Records related to minors on campus participating in Emory-sponsored programs or programs operated by outside entities at Emory facilities.
<i>Retention</i>	Required Consent Forms and Documentation – Retain 3 years after minor’s 18 th birthday. Program Activity Staff Records – Retain 5 years Authorized Adult Background Checks – Retain 4 years from end of fiscal year and rerun every 4 years.
<i>Disposition</i>	Confidential destruction required.
<i>Title</i>	Radiation Licensing Records
<i>Description</i>	This series documents licensing to receive, use, store, dispose of, and ship radioactive materials and to provide a record of the reception, handling, shipment, and disposal of radioactive material or radioactive hazardous wastes. This series may include, but is not limited to: waste material pick up requests and tags; radioactive waste drum inventory forms; uniform hazardous waste manifest forms; radiation waste shipment and disposal manifest forms; radiation material inventory sheets; radiation material shipment receipt record forms; waste disposal record cards; disposal site letters of arrival acknowledgment; and sewer radioactive material log sheets.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction and ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(d); Ga. Comp. R. & Regs.
<i>Title</i>	Radiation Monitoring and Exposure Records
<i>Description</i>	This series documents radiation testing and monitoring of employees, visitors, facilities, and the surrounding environment. This series may include, but is not limited to: dosimeter reports, exposure history, statement of occupational radiation dosage, and procurement for material.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction and ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(d); Ga. Comp. R. & Regs.

<i>Title</i>	Radiation Safety Committee Records
<i>Description</i>	This series documents the establishment of policy and procedure of the Radiation Safety Office. This series may include, but is not limited to agendas, minutes, and reports.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction and ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-17-.05 (86)(a); Ga. Comp. R. & Regs. r. 391-3-17-.05 (87);

<i>Title</i>	Risk Management Records
<i>Description</i>	Records that document insurance policies and claims dealing with liability or loss from damage. File may include correspondence, reports, policies, claims and other related records.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction.
<i>Citations</i>	O.C.G.A. 9-3-31; O.C.G.A. 9-3-32; O.C.G.A. 9-3-33 (s1a); O.C.G.A. 9-3-33 (s1b); O.C.G.A. 9-3-33 (s1c);

<i>Title</i>	Safe Medical Act Device Reports
<i>Description</i>	Reports of all incidents in which a medical device was used.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction and ineligible for transfer to University Archives.
<i>Citations</i>	
