
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 Emory's 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>	Accident and Injury Records
<i>Description</i>	This series documents claims made by faculty and staff for occupational injuries, accidents, or illnesses, including workers compensation claims not related to hazardous or toxic material exposure. This series may include, but is not limited to: workers compensation accident reports; Occupational Safety and Health Administration (OSHA); incident logs; employer payroll reports; hearing transcripts; notices of claim disposition; determination orders; opinions and orders; appeal letters; claim adjustment documentation; medical reports; cost statements; records of insurance coverage and reimbursement; and reports of safety analysis and compliance inspections.
<i>Retention</i>	Retain the year of settlement or disposition of claim plus five years. (Non-employee: Retain until disposition of claim plus 10 years.)
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1904.33 (a); O.C.G.A. 34-9-82 (a)(S1); O.C.G.A. 34-9-82 (a)(S2); 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>	Affirmative Action and Equal Opportunity Compliance Records
<i>Description</i>	This series documents the university's policies, plans, and compliance with affirmative action policies and Equal Employment Opportunity Commission (EEOC) requirements, such as the Equal Pay Act. This series may include but is not limited to: audit reports; written responses showing how compliance will be accomplished; Equal Employment Opportunity (EEO-6) Reports; Vets 100 Employment Reports; final biennial plans and policy statements; executive department printouts; Affirmative Action (AA) policies and procedures; AA mission and goals; AA office reviews; departmental reports; status reports on minority action programs; AA compliance data sheets; guidelines; and specific case histories.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records are ineligible for destruction, but eligible for transfer to the University Archives.
<i>Citations</i>	29 CFR 1602.48;

<i>Title</i>	Benefits Records
<i>Description</i>	This series documents employee participation in employer-offered benefits programs. This series may include, but is not limited to: enrollment in life insurance, medical and prescription drug plans, changes to election in benefits, and enrollment or refusal of coverage under the Consolidated Omnibus Budget Reconciliation Act (COBRA).
<i>Retention</i>	Retain 6 years after discontinuation or change of benefits.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 USCS 1027;

<i>Title</i>	Courtesy Scholarship Records
<i>Description</i>	This series documents administration of the educational benefit plan offered to employees, their spouses or same-sex domestic partners, and their children. This series may include, but is not limited to: application and supporting documentation such as birth certificates and marriage licenses.
<i>Retention</i>	Retain 6 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	

<i>Title</i>	Employment Eligibility Verification
<i>Description</i>	Records that document information used to establish the identity and to verify the employment eligibility of employees to preclude the unlawful hiring of persons not authorized to work in the United States. Records include completed I-9 records and copies of documents that establish the identity and the employment eligibility of the employee.
<i>Retention</i>	Retain for three years after date of hire or one year after termination of employment, whichever is longer.
<i>Disposition</i>	Confidential destruction is required.
<i>Citations</i>	8 CFR 274a.2 (b)(2)(i)(A)(s1a); 8 CFR 274a.2 (b)(2)(i)(A)(s1b); 8 CFR 274a.2 (c)(2)(s1a); 8 CFR 274a.2 (c)(2)(s1b); 8 CFR 274a.2 (e); 8 CFR 274a.2 (e)(1)(ii); 8 CFR 274a.2 (g)(1); 8 CFR 274a.2 (h),(i);

<i>Title</i>	Faculty Staff Assistance Program Records
<i>Description</i>	This series documents professional counseling and consultative services provided to faculty and staff. This series may include, but is not limited to: presenting complaint or basis for request for services, documentation of informed consent for treatment, assessment, psychological testing, structured interviews notes, and treatment or work plan.
<i>Retention</i>	Retain a) 7 years after last contact or b) 3 years after the age of majority when a minor.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	

<i>Title</i>	Grievance Case Records
<i>Description</i>	This series documents faculty and staff concerns and complaints and the subsequent investigation. This series may include, but is not limited to: notice of grievance, formal and informal investigation or interview notes, appeal documentation, and final report or summary statement.
<i>Retention</i>	Retain 7 years after resolution.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1627.3 (b)(1); 29 CFR 1627.3 (b)(2); 29 CFR 32.49;

<i>Title</i>	Impaired Physician Records
<i>Description</i>	This series documents the detection, intervention, rehabilitation, and monitoring of physicians with mental health and substance abuse issues. This series may include, but is not limited to: reports, findings, recommendations, and interview notes.
<i>Retention</i>	Retain 30 years after employee separation.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	

<i>Title</i>	Incident Investigations
<i>Description</i>	This series documents the occurrence of an incident, and any subsequent investigation, that involves employees, facilities, or the public. This series may include, but is not limited to: damage to property, security incidents, hazardous materials and waste spills, fire safety management problems, medical or laboratory equipment problems, and utility systems management problems.
<i>Retention</i>	Retain 2 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	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>	National Faculty Exchange Programs
<i>Description</i>	This series documents exchange programs, which allow university faculty members to exchange teaching positions with other institutions' faculty members within the United States. This series may include, but is not limited to: contracts, summaries, and correspondence.
<i>Retention</i>	Retain 7 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction is required.
<i>Citations</i>	O.C.G.A. 9-3-24;

<i>Title</i>	Occupational Safety and Health Administration (OSHA) Records
<i>Description</i>	This series documents compliance with federal Occupational Safety and Health Administration (OSHA) regulations. This series may include, but is not limited to: reports, logs, and policy and program documentation.
<i>Retention</i>	Retain 5 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1904.33 (a);

<i>Title</i>	Personnel Records: Faculty
<i>Description</i>	This series documents the employment history of faculty. This series may include, but is not limited to: employment applications which may include skill code sheets; resumes/curriculum vitea; agreement or request for position change, merit increase requests and notices, reasonable accommodation request records; request for re-employment (letter of hire), resignation and termination letters; commendations; recommendations; reprimands and disciplinary action records; work plans; personnel actions; performance evaluations; pay/budget action records; designation of beneficiary records; awards; licenses and certifications; and college credit information.
<i>Retention</i>	Retain 7 years after employee separation.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1627.3 (a); 29 CFR 1627.3 (b)(1); 29 CFR 1627.3 (b)(2); O.C.G.A. 9-3-24;

Title Personnel Records: Staff

Description This series documents the employment history staff. This series may include, but is not limited to: employment applications which may include skill code sheets; resumes/curriculum vitea; agreement or request for position change, merit increase requests and notices, reasonable accommodation request records; request for re-employment (letter of hire), resignation and termination letters; commendations; recommendations; reprimands and disciplinary action records; work plans; personnel actions; performance evaluations; pay/budget action records; designation of beneficiary records; awards; licenses and certifications; and college credit information.

Retention Retain 7 years after employee separation.

Disposition Confidential destruction is required.

Citations 29 CFR 1627.3 (a); 29 CFR 1627.3 (b)(1); 29 CFR 1627.3 (b)(2); O.C.G.A. 9-3-24;

Title Personnel Records: Students

Description This series documents the employment of undergraduate and graduate students. This series may include, but is not limited to: resumes, interview questionnaires and notes, performance evaluations, and reasonable accommodation request records.

Retention Retain 3 years after end of fiscal year.

Disposition Confidential destruction required

Citations 34 CFR 668.24 (e)(1),(2); 34 CFR 668.24 (e)(3);

Title Position Descriptions

Description This series documents job descriptions for positions and is used for employee recruiting, Fair Labor Standards Act eligibility analysis, position review, and reclassification purposes. This series may include, but is not limited to: job titles, qualifications, functions and responsibilities, duties, hierarchical data, job codes, salary ranges, and position description.

Retention Retain as long as administratively useful.

Disposition Confidential destruction not required

Citations

<i>Title</i>	Retirement Plan Administration
<i>Description</i>	This series documents plans established and/or maintained to provide for the payment of benefits to employees, or their beneficiaries, over a period of years after retirement. This series may include, but is not limited to: participant account records and actuarial accrued benefit analyses; plan documents and amendments; benefit claim procedures and procedures for reviewing denied claims; trust documents, custodial agreements, group annuity contracts and other funding instruments; plan and notices, election forms, and distribution forms.
<i>Retention</i>	Retain 7 years after benefit ends or final payment. (Plan and Amendments: Retain permanently)
<i>Disposition</i>	Confidential destruction required for Plan Administration records; (Plan & Amendments ineligible for destruction)
<i>Citations</i>	29 USCS 1027; 29 USCS 1059 (a)(1),(2);

<i>Title</i>	Search Records
<i>Description</i>	This series documents the advertisement, recruitment, and selection of faculty, staff, and student positions. This series may include, but is not limited to: requests to fill forms; funding information; approvals of recruitment proposals; position announcements and descriptions; applications; curriculum vitae or resumes; academic transcripts; samples of writing or publications; candidate lists; certificate of eligible; affirmative action compliance data forms; telephone conversation notes; rating sheets, tallies, screening and interview notes; reference and background checks; and review committee notes.
<i>Retention</i>	Retain 3 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1602.48; 29 CFR 1620.32 (c);

<i>Title</i>	Substance Abuse Testing Records
<i>Description</i>	This series documents the administration and results of alcohol and drug screening or testing of faculty, staff, student employees, or job applicants. This series may include, but is not limited to: logs, registers, and reports.
<i>Retention</i>	Retain 1 year from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1627.3 (b)(1);

<i>Title</i>	Tax Withholding Authorization Records
<i>Description</i>	This series documents deductions from faculty and staff's checks. This series include, but is not limited to: Statement for Claiming Benefits Provided by Section 911 of the Internal Revenue Code; Withholding Allowance Certificates (W-4s); Earned Income Credit Advance Payment Certificates (W-5s); Non-resident Alien Request for Exemption from Tax Withholding (IRS Form 8233); Alien Information Request Form; Request for Exemption from State Income Tax Withholding, and authorizations to deducted for medical, dental, life, and disability insurance, and parking permits.
<i>Retention</i>	Retain 4 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction is required.
<i>Citations</i>	26 CFR 31.6001-1 (e)(2)(S1); O.C.G.A. 48-7-111 (b)(s1a); O.C.G.A. 48-7-111 (b)(s1b);

<i>Title</i>	Time, Attendance, and Leave Records
<i>Description</i>	This series documents tracking of all time earned and taken by faculty and staff, including leave authorized under the Family and Medical Leave Act (FMLA). This series may include, but is not limited to: requests, deduction authorizations and registers, leave without pay records, ledgers and reports, overtime authorization or certification, compensation files, retirement contributions, time and attendance records, time sheets, and personnel activity reports (PAR).
<i>Retention</i>	Retain 4 years from end of fiscal year.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	26 CFR 31.6001-1 (a),(e); 26 CFR 31.6001-1 (b),(e); 26 CFR 31.6001-1 (c),(e); 26 CFR 31.6001-1 (e)(2)(S1); 26 CFR 31.6001-1 (e)(2)(S2); 29 CFR 825.500 (a)-(c)(1)-(7),(d),(e); 29 CFR 825.500 (b)(s2),(s3);

<i>Title</i>	Toxic or Hazardous Substance Exposure Records
<i>Description</i>	This series documents health treatment or examination given to faculty and staff for exposure to hazardous or toxic substances. This series may include, but is not limited to: health assessments, medical clearance or release to duty notices, reports, and x-rays.
<i>Retention</i>	Retain 30 years after employee separation.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	29 CFR 1910.1020 (d)(1)(i); 29 CFR 1910.1020 (d)(1)(i)(A),(B),(ii)(B); 29 CFR 1910.1020 (d)(1)(i)(C);

Title Training and Education Development Records

Description This series documents voluntary and mandatory training, testing, and continuing education opportunities developed or offered by Human Resources to faculty and staff. This series may include, but is not limited to: course descriptions, syllabi/outlines, course material and presentations, job aids, enrollment/attendance rosters, and testing material.

Retention Retain 3 years from end of fiscal year.

Disposition Confidential destruction not required

Citations 45 CFR 164.530 (j)(1)(i); 45 CFR 164.530 (j)(2)(s1a); 45 CFR 164.530 (j)(2)(s1b); Ga. Comp. R. & Regs. r. 111-8-40-.12 (e)(4);

Title Training and Education Records

Description This series documents an employees participation in training, testing, and continuing education opportunities required for licensing, certification, or qualification. This series may include, but is not limited to: training requests and authorizations, scores, and certificates of completion.

Retention Retain 6 years after completion.

Disposition Confidential destruction required

Citations 45 CFR 164.530 (j)(1)(i); 45 CFR 164.530 (j)(2)(s1a); 45 CFR 164.530 (j)(2)(s1b);

Title Unemployment Compensation Claims

Description This series documents unemployment compensation claims submitted by former employees. This series may include, but is not limited to: request for separation information (form ESA-103FF), separation notice, and records generated by the appeal of claim determinations.

Retention Retain 4 years from end of fiscal year.

Disposition Confidential destruction required

Citations 26 CFR 31.6001-1 (e)(2)(S1); 26 CFR 31.6001-1 (e)(2)(S2); Ga. Comp. R. & Regs. r. 300-2-6-.01 (p1);

<i>Title</i>	Visa: Exchange Visitor
<i>Description</i>	This series documents short-term appointment of non-immigrant international scholars as visiting faculty, specialists, researchers, and trainees on a J-1 visa. This series may include, but is not limited to: United States Information Service Certificates of Eligibility for Exchange Visitors records (DS-2019); descriptions of work to be performed; methods of financial support; passports; check-in records such as addresses, telephone numbers, and information concerning dependents and eligibility of spouses and children to accompany or join the scholar.
<i>Retention</i>	Retain 3 years after expiration of visa.
<i>Disposition</i>	Confidential destruction is required.
<i>Citations</i>	22 CFR 62.10 (h);

<i>Title</i>	Visa: Immigrant Scholars
<i>Description</i>	This series documents the application and approval of international scholars for permanent immigrant status. Records may include but are not limited to: applications for permanent employment issued by the Department of Labor; advertisements for positions; curriculum vitae; transcripts; letters of recommendation; notes on all applicants for positions demonstrating that a petitioner was the best qualified candidate for an advertised position; forms indicating the institution's efforts to employ comparably qualified U.S. citizens; and interviewers' notes and memoranda.
<i>Retention</i>	Retain 5 years after approval of permanent resident status.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	20 CFR 656.10 (f);

<i>Title</i>	Visa: Temporary Employment
<i>Description</i>	This series documents temporary employment of internationals and is used to monitor compliance with Immigration and Naturalization Service regulations. This series may include, but is not limited to: Petition for a Non-immigrant Worker (Form I-797); Labor Conditions Applications (LCA) for H-1B Non-immigrant; Prevailing Wage Information Request (Form ETA-9141); Application to Immigrant and Naturalization Service (INS); documentation of requests for visa extensions; details of work assignments; and letter of support.
<i>Retention</i>	Retain 6 years after expiration of visa.
<i>Disposition</i>	Confidential destruction required
<i>Citations</i>	
