



Retention of University Records

POLICY STATEMENT

Cornell University requires that university records, as defined herein, regardless of format, be disposed of or retained for specific periods of time in accordance with legal or other institutional requirements, or for historical value. The university has designated official repositories to manage the retention and disposal of these records according to procedures outlined in this document.

REASON FOR POLICY

The university is committed to effective record management to meet legal and regulatory standards, preserve its history, optimize the use of space, and minimize the cost of record retention.

ENTITIES AFFECTED BY THIS POLICY

– All units of the university

WHO SHOULD READ THIS POLICY

– All members of the university community

MOST RECENT VERSION OF THIS POLICY

– www.dfa.cornell.edu/policy/policies/retention-university-records

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RELATED RESOURCES

University Policies and Documents Applicable to Only Ithaca Campus Units

[University Policy 4.4, Access to Alumni Affairs and Development Information](#)

[University Policy 4.5, Access to Student Information](#)

[University Policy 4.12, Data Stewardship and Custodianship](#)

[University Policy 5.5, Stewardship and Custodianship of Electronic Mail](#)

[University Policy 5.10, Information Security](#)

University Policies and Documents Applicable to Only Weill Cornell Campus Units

[WCMC 11.1 – Responsible Use of Information Technology Resources](#)

[WCMC 11.3 – Data Classification](#)

External Documentation

New York State Disposal of Personal Records Law

Forms and Systems Applicable to Only Ithaca Campus Units

[Cornell University Archives Transfer Report Form](#)

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CONTACTS

Direct any questions about this policy to your unit's administrative manager. If you have questions about specific issues, call the following offices:

Ithaca Campus Units

Subject	Contact	Telephone	Web Address/Email
Policy Clarification or Exceptions	University Counsel	(607) 255-5124	
Electronic Media Storage	Office of Information Technologies	(607) 255-3584	
Permanent Storage of Inactive Records	University Archives	(607) 255-3530	
Records Management	University Records Manager	(607) 255-3530	

Weill Cornell Campus Units

Subject	Contact	Telephone	Web Address/Email
Policy Clarification or Exceptions	University Counsel	(212) 746-0463	
Electronic Media Storage	Information Technologies & Services	(212) 746-4878	
Permanent Storage of Inactive Records	Weill Cornell Medical Center (WCMC) Archives	(212) 746-6072	

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DEFINITIONS

These definitions apply to terms as they are used in this policy.

Active Record	See "University Record," below.
Archival Record	See "University Record," below.
Fiscal Year	The university's fiscal year, which is from July 1 through June 30.
Inactive Record	See "University Record," below.
Official Repository	The unit, department, or division designated as having responsibility for retention and timely destruction of particular types of university or Weill Cornell Medical College (WCMC) records. Such responsibility is assigned to the unit's administrator or a designee. Official repositories are identified in Tables 1 and 2 of "Record Retention: Duration and Location" of Procedures.
University Archives	A part of the Division of Rare and Manuscript Collections that promotes knowledge and understanding of the university's origins, aims, programs, and goals; and facilitates effective records management. The Archives collects and preserves records of historical, legal, fiscal, and administrative value. It provides permanent retention of official records of the university, its officers, and component parts; maps and architectural records; audiovisual materials; publications; and artifacts documenting the university's history. See also, "WCMC Archives," below.
University Archivist	The individual responsible for (1) designating which university records have historical value, and (2) effecting the transfer of all archival records from the office in which they originated or were received to the University Archives at such times and in the manner and form prescribed by the Archives. See also, "WCMC Archivist," below.
University Record	<p>Any form of recorded information, regardless of physical characteristics, that is created, received, recorded, or legally filed in the course of university or WCMC business or in the university's or WCMC's legal obligations. University records serve as evidence of the university's organization, functions, policies, decisions, procedures, operations, transactions, or other activities.</p> <p>◆Note: An official record can be in hard-copy form (e.g., paper, magnetic tape, film, etc.) or electronic form. An electronic document (e.g., email, cloud-based documents, etc.) is considered a university record and is subject to the same retention period as the hard copy equivalent if the electronic document is created or received in the transaction of business; retained as evidence of official policies/decisions; and/or has historical significance or valuable informational content.</p> <p>Active Record</p> <p>A record with current use for the unit, department, or division that generated it. Records remain active for varying numbers of years, depending on the purpose for which they were created.</p> <p>Archival Record</p> <p>A record that is no longer required by the unit, department, or division in which it originated or was received, and that has permanent legal, institutional, or historical value.</p> <p>Inactive Record</p> <p>A record with no current use for the unit, department, or division that generated it and that has not yet reached the end of its retention period.</p>

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DEFINITIONS, CONTINUED

WCMC Archives	A part of the combined NewYork-Presbyterian/Weill Cornell Medical Center archive office that promotes knowledge and understanding of the center's origins, aims, programs, and goals; and facilitates effective records management. The Archives collects and preserves records of historical, legal, fiscal, and administrative value. It provides permanent retention of official records of the center, its officers, and component parts; maps and architectural records; audiovisual materials; publications; and artifacts documenting the center's history. See also, "University Archives," above.
WCMC Archivist	The individual responsible for (1) designating which WCMC records have historical value, and (2) effecting the transfer of all archival records from the office in which they originated or were received to the WCMC Archives at such times and in the manner and form prescribed by the Archives, and subject to the appropriate retention and disposition schedules that are outlined in this document. See also, "University Archivist," above.

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PROCEDURES – ITHACA CAMPUS UNITS

Responsibilities for Managing University Records

Certain departments and units are designated as “official repositories,” as listed in Tables 1 and 2, which follow. Official repositories are responsible for establishing and maintaining appropriate records retention management practices. Departments and units that are not official repositories are expected to retain records only while they remain active records.

Each unit’s administrator or a designee must do the following:

- Implement the unit’s and/or office’s records management practices
- Ensure that these records management practices are consistent with this policy
- Educate staff within the administrative unit in understanding sound records management practices
- Preserve inactive records of legal, fiscal, administrative, or historical value. These records should be transferred to the University Archives
- Ensure that access to confidential files is restricted. Long-term restrictions on access to selected archival records should be negotiated at the time of their transfer to the University Archives
- Destroy inactive records that have no archival value upon expiration of the applicable retention period

Direct questions about these responsibilities to the University Records Manager, who will work closely with units to ensure understanding of this policy and implementation of these responsibilities.

◆ **Note:** An official record can be in the form of original paper, or may be a digital surrogate, at the discretion of the official repository.

Preserving or Disposing of University Records

When the prescribed retention period (see Tables 1 and 2 of “Record Retention: Duration and Location” of Procedures) for university records has passed, a determination of whether to preserve or dispose of the documents must be made. To decide if the record is of historic value to the university, consult the University Archivist, who has the authority to designate which records are archival.

- **Option A**

Archival Records

Records in Hard Copy (paper, magnetic tape, CD, DVD, film, etc.) If you have determined that the records are archival, they should be transferred to University Archives. Call the University Records Manager to initiate the following:

1. Review records to be sent to University Archives

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2. Request archival boxes (one full file drawer = two boxes)
3. Request a transfer form (See Related Resources)
4. Schedule a time for boxes to be picked up

Records in Electronic Form

The official repository for electronic records, in cooperation with the University Archives, has the responsibility to manage those records and retain them appropriately, in accordance with the protection requirements detailed in University Policy 5.10, Information Security.

- **Option B**

Non-archival Records

Confidential Records: Shred or otherwise render unreadable records with confidential information, including records containing social security numbers, credit card information, drivers' license numbers, patient treatment information, or other information as designated by an information steward.

◆**Note:** New York State's Disposal of Personal Records Law requires that appropriate measures be taken when disposing of records containing personal identifying information, such as a name, number, personal mark, or other identifier, that can be used to identify a person, when coupled with one or more data elements including social security number, driver's license number, mother's maiden name, financial services or bank account number, by (1) shredding the record, (2) destroying the personal identifying information contained in the record, (3) modifying the record to make the personal identifying information unreadable, or (4) taking reasonable actions consistent with commonly accepted industry practice.

Other Records: Dispose of records that contain public information in an appropriate manner.

◆**Note:** Periodically, review records generated and maintained in university information systems or equipment to ensure that these requirements are met.

Record Retention: Location and Duration

Tables 1 and 2, which follow, list the official repositories for university records, as well as how long these records must be retained.

◆**Note:** Where a record falls into more than one category, the longer period governs.

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 University

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

Counsel, the University Audit Office, the Division of Financial Affairs, or the Office of Sponsored Programs.

◆ **Note:** No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in these tables should be addressed to the Office of University Counsel.

◆ **Caution:** If you have reason to believe that a claim may be asserted for which records scheduled for destruction may be relevant, do not destroy such records until you consult with the Office of University Counsel.

Table 1
Repositories and Retention Periods for Undergraduate, Graduate, Professional, Continuing Education and Summer Sessions, Extramural and Special Programs Student-Related, Academic Records, Ithaca Campus Units

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic, Student		
Academic action (leaves of absence, withdrawals, etc.)	<i>Office of the University Registrar</i>	Permanent
Academic action documentation	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Academic integrity code violations (findings of violation and related case files)	<i>Appropriate college</i>	Permanent
Academic records (petitions, degree progress, actions, grade change forms, etc.)	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Degree recipients	<i>Office of the University Registrar</i>	Permanent
Degree requirement exception/change petitions	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Disciplinary records (findings of violation and related case files), where penalty imposed is suspension or expulsion	<i>Office of the Judicial Administrator</i>	Permanent
Disciplinary records (findings of violation and related case files), where penalty imposed is probation	<i>Office of the Judicial Administrator</i>	Permanent, unless otherwise indicated by the Office of the Judicial Administrator
Disciplinary records (findings of violation and related case files), where penalty imposed is NOT probation, suspension, or expulsion, but includes a reprimand	<i>Office of the Judicial Administrator</i>	Until the student's graduation
Disciplinary records (findings of violation and related case files), where penalty imposed is NOT probation, suspension, or expulsion, but includes a warning	<i>Office of the Judicial Administrator</i>	No requirement to retain

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Disciplinary records (entire case files, including records of any hearing, regardless of whether there are findings of violation) for any formal complaint brought under the Procedures for Resolution of Reports Against Students Under Cornell University Policy 6.4 for the Following Acts of Prohibited Conduct: Dating Violence; Domestic Violence; Sexual Assault; Sexual Exploitation; Sexual and Gender-Based Harassment; Stalking; Aiding Prohibited Conduct; Attempting to Commit Prohibited Conduct; Retaliation; and Violating an Interim Measure.	<i>Office of the Judicial Administrator</i>	7 years from the date of a final, binding decision.
Grade changes (changes to final grades)	<i>Office of the University Registrar</i>	Permanent
Grade rosters (record of grade submitted)	<i>Office of the University Registrar</i>	Permanent
Grades (final grades)	<i>Office of the University Registrar</i>	Permanent
Holds (registration, diploma, transcript, etc.)	<i>Originating office</i>	Until released
Leave of absence/withdrawal authorizations	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Name change authorizations	<i>Office of the University Registrar</i>	5 years from graduation or date of last attendance
Transcripts	<i>Office of the University Registrar</i>	Permanent
Transfer credit evaluations	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance

Academic, Courses

Class Rosters	<i>Office of the University Registrar</i>	Permanent
Course offerings and schedule of classes	<i>Office of the University Registrar</i>	Permanent
Enrollment change forms	<i>Office of the college registrar</i>	1 year from date of enrollment
Enrollment changes	<i>Office of the University Registrar</i>	Permanent
Grade books	<i>Appropriate academic department</i>	5 years after completion of course
Graded course materials (homework, exams, etc.)	<i>Appropriate academic department</i>	1 year after completion of course
Student registration forms (Continuing Education, summer sessions, and extramural studies)	<i>Office of Continuing Education and Summer Sessions</i>	5 years from course registration

Admissions for Applicants Who Do Not Enroll, Whether Accepted or Rejected

Applications for admission or readmission, relevant correspondence, entrance exam reports (ACT, CEEB, et.al.), letters of recommendation, transcripts (high school and other colleges)	<i>Appropriate admissions office</i>	2 years from start of application term
Financial aid records	<i>Appropriate financial aid office</i>	1 year from start of application term

Admissions for Applicants Who Enroll

Advanced placement records, applications for admission or readmission, relevant correspondence, entrance exam reports (ACT, CEEB, et.al.)	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Financial aid records	<i>Appropriate financial aid office</i>	3 years from graduation or date of withdrawal 5 years from date of leave of absence

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
International student forms (visa documentation, financial certification, etc.)	<i>Office of International Students and Scholars</i>	5 years from expiration date of immigration document
Letters of recommendation (including waiver for right of access)	<i>Appropriate admissions office</i>	Until date of matriculation
Recruitment materials	<i>Appropriate admissions office</i>	Until date of matriculation
Residency certificates	<i>Appropriate admissions office</i>	Until date of matriculation
Transcripts (high schools and other colleges)	<i>Office of the college registrar</i>	5 years from graduation or date of last attendance
Publications, Statistical Documents, and Reports		
Commencement programs	<i>Commencement Office</i>	Permanent
Course catalogs	<i>Office of the University Registrar</i>	Permanent
Student degree, enrollment, and racial/ethnic reports and publications	<i>Institutional Research and Planning</i>	Permanent
SUNY reports	<i>Division of Planning and Budget</i>	10 years
Miscellaneous		
Enrollment verification requests	<i>Office of the University Registrar</i>	1 year from submission date
NCAA eligibility certifications	<i>Office of the University Registrar</i>	7 years from date of certification
Transcript requests	<i>Office of the University Registrar</i>	1 year from submission date
Veterans Administration certification of eligibility	<i>Office of the University Registrar</i>	5 years from graduation or date of last attendance

Table 2
Repositories and Retention Periods for Non-Student-Related Records, Ithaca Campus Units

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic Personnel		
Academic search records	<i>See "Affirmative Action/Equal Opportunity" section</i>	
Disclosures of external financial interests and commitments	<i>See "Research Integrity and Assurance" section</i>	
Grievances	<i>Appropriate college office</i>	No cause findings: 3 years from determination Cause findings, Permanent
Personnel files, appointment letters, and forms	<i>See "Human Resources" section</i>	
Tenure or promotion dossiers	<i>Appropriate college office (or, for Africana Studies only, the Provost)</i>	If action approved, 3 years; If tenure denied, 3 years from end of term appointment
Trustee decisions regarding academic personnel and designated executives	<i>Secretary of the Corporation</i>	Permanent
Accounting and Finance		
Account reconciliations (balance sheet)	<i>Division of Financial Affairs, or designated department</i>	6 years

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TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Accounting reports (monthly reports) schedules of department balances, transaction statements, account analysis statements, monthly and year-to-date salary and wage statements	<i>Division of Financial Affairs</i>	6 full fiscal years
Accounts payable vouchers and attachments	<i>Division of Financial Affairs</i>	6 full fiscal years
Accounts receivable statements, centrally generated	<i>Division of Financial Affairs</i>	6 full fiscal years
Accounts receivable statements, unit generated	<i>Division of Financial Affairs, or designated department</i>	6 full fiscal years
Annual financial reports	<i>Division of Financial Affairs</i>	Permanent
APPS invoices	<i>Division of Financial Affairs</i>	6 full fiscal years
Banking records, including deposit and withdrawal records, bank statements and reconciliations, voided and canceled checks	<i>Division of Financial Affairs</i>	6 full fiscal years
Billing records	<i>Division of Financial Affairs, or designated department</i>	6 years
Board of Trustees audit committee minutes	<i>University Audit Office</i>	Permanent
Capital equipment records	<i>Division of Financial Affairs</i>	Life of asset: records of equipment purchased on federal funds must be retained for 3 years after final disposition
Cash receipts	<i>Division of Financial Affairs</i>	6 full fiscal years
Depreciation records	<i>Division of Financial Affairs</i>	Life of asset
Effort certifications	<i>Division of Financial Affairs</i>	6 full fiscal years
Facilities and administrative cost and benefit rate calculations	<i>Division of Financial Affairs</i>	7 years
Inventories	<i>Division of Financial Affairs, or designated department</i>	Life of asset
Journal entries and back-up documentation	<i>Division of Financial Affairs</i>	6 full fiscal years
KFS e-docs, including supporting documentation such as invoices, vendor quotes, etc.	<i>Division of Financial Affairs</i>	6 full fiscal years (uploaded electronic copy or original documentation not uploaded [e.g., confidential material]) 60 days (original paper documents, included in uploaded electronic copy)
New account records and back-up documentation	<i>Division of Financial Affairs</i>	6 full fiscal years after account closing
Payment authority authorizations	<i>Division of Financial Affairs</i>	6 full fiscal years
Procurement card charge documentation	<i>Cardholder</i>	60 days for all fund types
Subsidiary ledgers (accounts payable, accounts receivable, etc.)	<i>Division of Financial Affairs</i>	6 full fiscal years
Travel reimbursements and attachments	<i>Division of Financial Affairs</i>	6 full fiscal years
University Audit work papers and reports	<i>University Audit Office</i>	6 years
Work papers for annual financial reports	<i>Division of Financial Affairs</i>	6 full fiscal years

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TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Administration, General		
Correspondence/email regarding legal matters, fiscal matters, administrative matters, and/or other non-routine messages/letters ◆Note: An official record may be in hard copy (e.g. paper, magnetic tape, film, etc.) or electronic form. An electronic document (e.g., email, cloud-based documents, etc.) is considered a university record and is subject to the same retention period as the hard copy equivalent if the electronic document is created or received in the transaction of business; retained as evidence of official policies/decisions; and/or has historical significance or valuable informational content.	Content will determine the appropriate retention period and location of correspondence/email	
Minutes and meeting proceedings	Content will determine the appropriate retention period and location of minutes and meeting proceedings	
Reports - annual, faculty, statistical, strategic, etc.	<i>Office of origin</i>	Permanent
Affirmative Action/Equal Opportunity		
Academic search plans and statements	<i>For forms, including the Academic Search and Selection form, Office of Workforce Diversity and Inclusion; for search materials and documents supporting decision, appropriate department</i> ◆Exception: If a newly appointed faculty member submits a permanent residency application to the federal Department of Labor, the appropriate department must retain the search materials and documents supporting the decision for all applicants of the position. <i>The retention for this exception is 5 years.</i>	3 years
Academic search waivers	<i>Office of Workforce Diversity and Inclusion; appropriate department</i>	For permanent waivers, 3 years from date of appointment; for limited-term waivers, 3 years from satisfaction of subsequent search requirements or appointment termination
Affirmative action programs	<i>Office of Workforce Diversity and Inclusion</i>	3 years
Conciliation agreements/orders on consent	<i>Office of Workforce Diversity and Inclusion</i>	Permanent
Documents supporting other academic and nonacademic employment decisions (e.g., promotion, termination, compensation)	<i>Appropriate department</i>	3 years from date of decision
Federal and state-required statistics and reports	<i>Office of Workforce Diversity and Inclusion</i>	3 years

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Nonacademic search and hiring forms	<i>Requisitions, applicant EEO identification, search waiver documents, and documentation of hiring decision, Office of Workforce Diversity and Inclusion; all other documentation, appropriate department</i>	3 years from date of appointment
A record (list) of complaints of prohibited discrimination and protected status (including sexual) harassment	<i>Office of Workforce Policy and Labor Relations</i>	Permanent
A record (list) of reported bias activity	<i>Office of Workforce Diversity and Inclusion</i>	Most recent 3 years
Records generated in the investigation of protected status (including sexual) harassment complaints or complaints of discrimination that are dismissed, or where parties do not pursue	<i>Office of Workforce Policy and Labor Relations</i>	3 years
Records generated in the investigation of protected status (including sexual) harassment complaints or complaints of discrimination that result in a finding of merit	<i>Office of Workforce Policy and Labor Relations</i>	Permanent
Records generated in the reporting of bias activity	<i>Office of Workforce Diversity and Inclusion</i>	3 years
Alumni Affairs and Development		
Alumni records	<i>Advancement Services, Alumni Affairs and Development</i>	Permanent
Gift records	<i>Advancement Services, Alumni Affairs and Development</i>	7 years
Gifts of art to the Johnson Museum	<i>Advancement Services, Alumni Affairs and Development</i>	Permanent
Original gift letter agreements, signed by the President and the donor	<i>Office of University Counsel</i>	Permanent
Original gift letter agreements, all others	<i>Advancement Services, Alumni Affairs and Development</i>	Permanent
Planned gifts (trusts, life income, agreements, annuities), real estate gifts	<i>Office of Trusts, Estates and Planned Giving, and Alumni Affairs and Development</i>	Permanent
Bursar		
Cashier reports	<i>Office of the University Bursar</i>	6 years
Disclosure statements	<i>Office of the University Bursar</i>	3 years after account has been paid in full
Residency change documents (non-resident to resident)	<i>Office of the University Bursar</i>	5 years from graduation or date of last attendance
Student loan records	<i>Office of the University Bursar</i>	3 years after the loan has been repaid in full
Tuition and fee charges	<i>Office of the University Bursar</i>	6 years
Construction		
Construction documentation	<i>IPP-UA/CPO – Facilities Archiving</i>	Permanent
Contracts, agreements, and certificates of insurance	<i>IPP-EPA – Facilities Contracts</i>	10 years or longer, as deemed appropriate

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Corporate Records		
Accreditation records	<i>Division of Planning and Budget</i>	Permanent
Board of Trustee minutes	<i>Secretary of the Corporation</i>	Permanent
Bylaws	<i>Secretary of the Corporation</i>	Permanent
Charter	<i>Secretary of the Corporation</i>	Permanent
Environmental Health and Safety		
Confined space entry – completed permits	<i>Fire Protection and Emergency Services</i>	1 Year
Evacuation drill records	<i>Fire Protection and Emergency Services</i>	5 years
Exposure monitoring records	<i>Fire Protection and Emergency Services</i>	30 years
Fire protection systems records	<i>Fire Protection and Emergency Services</i>	5 years
Fume hood testing records	<i>Laboratory and Radiation Safety</i>	3 years
Hazardous waste disposal manifests and reports	<i>Laboratory and Radiation Safety</i>	3 years
Homeland security chemical lists	<i>Fire Protection and Emergency Services</i>	3 years
Incident records	<i>Fire Protection and Emergency Services</i>	5 years
Injury and illness reports	<i>Fire Protection and Emergency Services</i>	5 years
OSHA training records	<i>Fire Protection and Emergency Services</i>	Until end of employment
Radiation dose reports	<i>Laboratory and Radiation Safety</i>	Permanent
Radiation safety training records	<i>Laboratory and Radiation Safety</i>	3 years
Radioactive materials license and safety committee records	<i>Laboratory and Radiation Safety</i>	Permanent
Radioactive material receiving and inventory records	<i>Laboratory and Radiation Safety</i>	3 years
Select agent records and correspondence	<i>Fire Protection and Emergency Services</i>	Permanent
Human Resources		
Employee personnel files (including application, resume, payroll, appointment/salary forms)	<i>Division of Human Resources</i>	6 years after termination
Federal reporting requirements: welfare benefits and other fringe benefit plans (i.e., 5500-s)	<i>Division of Human Resources</i>	Permanent
I-9 Forms (faculty and staff)	<i>Division of Human Resources</i>	3 years, or 1 year after termination (whichever is greater)
I-9 Forms (students)	<i>Office of Financial Aid and Student Employment</i>	3 years, or 1 year after termination (whichever is greater)
Individual contracts of employment	<i>Division of Human Resources</i>	6 years after termination

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Occupational injury or illness, records relating to	<i>Division of Human Resources</i>	5 years
Performance appraisals	<i>Departmental personnel files</i>	3 years
Search committee records, including employment applications, resumes, and all applicant search materials	<i>Departmental personnel files</i>	3 years
Union agreements	<i>Division of Human Resources</i>	Permanent
Volunteer registration forms, parental consent forms, and agreements	<i>Appropriate department</i>	3 years
Workers' compensation claims and insurance policies	<i>Division of Human Resources</i>	18 years
Insurance		
Certificates of insurance	<i>Risk Management and Insurance</i>	Permanent
Incident reports, accident reports	<i>Office of Risk Management and Insurance</i>	4 years after report date or until claim is settled or closed
Indemnification agreements, hold-harmless agreements, contracts	<i>Appropriate unit</i>	If no claim is presented, 3 years after activity is completed If claim is presented, turn over to Office of Risk Management and Insurance
Insurance policies (liability, property, and other policies)	<i>Office of Risk Management and Insurance</i>	Permanent
Legal		
Consent orders	<i>Office of the University Counsel</i>	Permanent
Court orders	<i>Office of the University Counsel</i>	Permanent
Judgments	<i>Office of the University Counsel</i>	Permanent
Releases	<i>Office of the University Counsel</i>	Permanent
Settlements	<i>Office of the University Counsel</i>	Permanent
Library		
Circulation records, excluding special collections	<i>Office of the University Librarian</i>	Retained until items are returned and discharged
Circulation records for special collections	<i>Appropriate department</i>	Permanent
Library Annex location records	<i>Office of the University Librarian</i>	Permanent
Library catalog	<i>Office of the University Librarian</i>	Permanent
License agreements	<i>Office of the University Librarian</i>	7 yrs. from expiration or termination of agreement
Memoranda of understanding/deeds of gift	<i>Appropriate department</i>	Permanent
Medical		
Gannett Health Services for regulatory required medical surveillance and monitoring records - Occupational Medicine	<i>Gannett Health Services</i>	30 years after person leaves the university
Gannett Health Services patient records -Non-regulatory / Non-occupational medicine	<i>Gannett Health Services</i>	6 years

POLICY 4.7
Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Gannett Health Services health records for minor patients.	<i>Gannett Health Services</i>	6 years and until one year after the minor patient reaches the age of 18 years
Inventions and Related Property Rights		
Foreign patent/application-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Licensing agreement-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	6 years from expiration or termination of agreement
Original executed invention disclosure forms	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original executed licensing agreements	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original executed United States Patent and Trademark Office (USPTO) assignment forms	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original letters, patents	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original registered trademarks	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Royalty records	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Life of technology/ patent or TM, plus 6 years
Trademark-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
U.S. patent/application correspondence papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
U.S. patent/application filing papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	1 year after issuance or abandonment
Payroll		
Annual payment records (W-2, alpha lists, employee transaction lists)	<i>University Payroll Office</i>	7 years
Imputed income records (auto usage, CCTS, etc.)	<i>University Payroll Office</i>	7 years
Information returns filed with federal and state authorities (W-2, 941, 1042-S, etc.)	<i>University Payroll Office</i>	7 years
Labor distribution adjustment records	<i>University Payroll Office</i>	6 full fiscal years
Leave reporting records, exempt employees	<i>University Reporting and Exempt Leave Accrual and Reporting System – The Division of Human Resources is the Official Repository</i> <i>Kronos Reporting System – University Payroll Office is the Official Repository</i> <i>Outside systems – Appropriate Dept/Unit is the Official Repository</i>	4 years
Leave reporting records, nonexempt employees	<i>University Payroll Office</i>	7 years
Payroll deduction authorization forms (W-4, IT-2104, garnishments, etc.)	<i>University Payroll Office</i>	7 years

POLICY 4.7
Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Payroll vouchers	<i>University Payroll Office</i>	7 years
Record of payments and deductions (payroll registers, deductions lists, adjustments)	<i>University Payroll Office</i>	7 years
Time cards, other	<i>Appropriate department</i>	7 years
Time cards, student	<i>Appropriate department</i>	7 years
Wage assignment orders	<i>University Payroll Office</i>	7 years
Pension		
Employee eligibility for pension	<i>Division of Human Resources</i>	6 years after death of eligible employee and beneficiary
Employee personal information (name, address, social security number, period of employment)	<i>Division of Human Resources</i>	6 years after death of eligible employee and beneficiary
Employee service records	<i>Division of Human Resources</i>	6 years after death of eligible employee and beneficiary
Pension paid to employees or their beneficiaries	<i>Division of Human Resources</i>	6 years after death of employee and beneficiary
Pension plans and all attached amendments	<i>Division of Human Resources</i>	Permanent
Pensions or pension plans filed with the Department of Labor and the Internal Revenue Service	<i>Division of Human Resources</i>	Permanent
Plan administrator setting forth authority to pay, records of	<i>Division of Human Resources</i>	Permanent
Planning and Budget		
Plans and projections	<i>Division of Planning and Budget</i>	Permanent
Police Department, Cornell University		
Accident reports	<i>Office of the University Police</i>	Permanent
Crime reports	<i>Office of the University Police</i>	Permanent
Property damage reports	<i>Office of the University Police</i>	Permanent
Policy, University		
University policies	<i>University Policy Office</i>	Permanent
Purchasing		
Purchase orders, contracts, agreements	<i>Cornell Procurement Services</i>	7 full fiscal years
Real Property		
Abstracts of title	<i>Office of the Department of Real Estate</i>	Until disposal of property
Documents for leases, licenses, construction contracts and other contracts of a temporary nature, valued at less than \$50,000	<i>Office of the Department of Real Estate</i>	6 years after expiration of lease or contract term
Property deeds, easements, licenses, rights of way, leases, rights of first refusal, remainder interests, mortgages, survey maps	<i>Office of the Department of Real Estate</i>	Permanent
Real property tax exemption applications and renewal forms filed with assessors	<i>Office of the Department of Real Estate</i>	6 years

POLICY 4.7
Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Title insurance policies	<i>Office of the Department of Real Estate</i>	10 years after disposal of property
Sponsored Projects Contracts, Grants		
Grant and contract proposals, awards, agreements and supporting documentation	<i>Office of Sponsored Programs</i>	6 years after close of grant for New York State 3 years after close of grant for all other grants and contracts
Research Integrity and Assurance		
Animal welfare records	<i>Office of Research Integrity and Assurance - Institutional Animal Care and Use Committee</i>	3 years or contract period
Disclosures of external financial interests and commitments	<i>Office of Research Integrity and Assurance</i>	5 years post-disclosure or 5 years after the grant period has ended (whichever is later)
Export control records	<i>Office of Research Integrity and Assurance</i>	5 years after the grant period has ended
Institutional biosafety committee records, including biohazardous agents, recombinant DNA molecules, gene therapy	<i>Office of Research Integrity and Assurance</i>	5 years after the grant period has ended
Institutional review board for human participants records	<i>Office of Research Integrity and Assurance</i>	5 years after grant period has ended for the full record Permanent for selected records
Scientific misconduct records	<i>Office of Research Integrity and Assurance</i>	10 years after the grant period has ended
Tax		
Assets: acquisition/disposition	<i>See "Accounting and Finance" section</i>	
Depreciation schedules	<i>See "Accounting and Finance" section</i>	
Excise tax returns	<i>Division of Financial Affairs</i>	7 years
Fringe benefit returns	<i>See "Human Resources" section</i>	
Income tax returns (990-T, CT-13, etc.)	<i>Division of Financial Affairs</i>	Permanent
Information return (990)	<i>Division of Financial Affairs</i>	Permanent
Information returns (1099, 8282, 90.22, etc.)	<i>Division of Financial Affairs</i>	7 years
Payroll tax returns (W-2, social security, unemployment tax)	<i>See "Payroll" section</i>	
Pension tax returns	<i>See "Pension" section</i>	
Property tax returns	<i>See "Real Property" section</i>	
Sales tax returns	<i>Division of Financial Affairs</i>	6 years

POLICY 4.7

Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS

Responsibilities for Managing University Records

Departments and divisions that maintain Weill Cornell Medical College (WCMC) records are responsible to do the following:

- Implement the records management practices identified in this policy
- Ensure that all records management practices are consistent with this policy
- Preserve inactive records of legal, fiscal, administrative, or historical value. These records should be transferred to the WCMC Archives
- Ensure that access to confidential files is restricted. Long-term restrictions on access to selected archival records should be negotiated at the time of their transfer to the WCMC Archives
- Destroy inactive records that have no archival value upon expiration of the applicable retention period

Direct questions about these responsibilities to the WCMC Records Manager.

Preserving or Disposing of WCMC Records

When the prescribed retention period (see Tables 1 and 2 of “Record Retention: Duration and Location” of Procedures) for WCMC records has passed, a determination of whether to preserve or dispose of the documents must be made. To decide if the record is of historic value to WCMC, consult the WCMC Archivist, who has the authority to designate which records are archival.

- **Option A**

Archival Records

All departments and divisions must send copies of any records (paper-based or electronic) that have enduring value to the WCMC archives. These records include, but are not limited to, the following items: annual reports, biographical information of faculty and staff, any information related to the history of the Medical College and its facilities, announcements, booklets, brochures, bulletins, calendars, catalogs, directories, flyers, guides, handbooks, invitations, journals, magazines, manuals, newsletters, pamphlets, programs and yearbooks.

- **Option B**

Non-archival Records

Confidential Records: Shred records with confidential information, including records containing social security numbers, credit card information, drivers’ license numbers, patient treatment information, or other information as designated by an information steward. A complete definition of confidential data is available in WCMC Policy 11.3 – Data Classification.

◆ **Note:** New York State’s Disposal of Personal Records Law requires

POLICY 4.7

Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

that appropriate measures be taken when disposing of records containing personal identifying information, such as a name, number, personal mark, or other information that can be used to identify a person, when coupled with one or more data elements including social security number, driver's license number, mother's maiden name, financial services or bank account number, by (1) shredding the record, (2) destroying the personal identifying information contained in the record, (3) modifying the record to make the personal identifying information unreadable, or (4) taking reasonable actions consistent with commonly accepted industry practice.

Other Records: Dispose of records that contain public information in an appropriate manner.

◆**Note:** At least every six months, review records generated and maintained in WCMC information systems or equipment to ensure that these requirements are met.

Record Retention: Location and Duration

Record Retention: Location and Duration

Tables 1 and 2, which follow, list the official repositories for WCMC records, as well as how long these records must be retained.

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 University Counsel, the University Audit Office, the Division of Financial Affairs, or the Office of Sponsored Programs.

◆**Note:** No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in these tables should be addressed to the Office of University Counsel.

◆**Caution:** Departments and divisions that are not official repositories and that retain duplicate or multiple copies of these WCMC records must comply with this policy.

◆**Caution:** If you have reason to believe that a legal claim may be asserted for which records scheduled for destruction may be relevant, do not destroy such records until you consult with the Office of University Counsel.

◆**Caution:** Certain records, for example in clinical practices, have set destruction policies based on when they are electronically scanned. Such specific policies take precedence over this general policy.

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

Table 1
Repositories and Retention Periods for Student-Related Records, Weill Cornell Campus Units

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic, Student		
Academic actions (dismissal, etc.)	<i>WCMC Registrar</i>	Permanent
Academic integrity code violations (findings of violation and related case files)	<i>Office of Academic Affairs</i>	Permanent
Academic records (including narrative evaluations, competency assessments, etc.)	<i>WCMC Registrar</i>	Permanent
Change of Course forms-Continuing Education, Summer Sessions, and Extramural Studies	<i>WCMC Registrar</i>	5 years from date of enrollment
Change to six digit SRSS ID number	<i>WCMC Registrar</i>	Permanent
Class lists (original)	<i>WCMC Registrar</i>	Permanent
Consent to Release Personally Identifiable Information (requests for non-disclosure)	<i>WCMC Registrar</i>	Keep most recent change until next academic year; signatures kept 5 years
Course offerings	<i>WCMC Registrar</i>	Permanent
Curriculum change authorizations	<i>WCMC Registrar</i>	5 years from graduation or date of last attendance
Disciplinary records (findings of violation and related case files)	<i>WCMC Registrar</i>	Permanent where penalty imposed is probation, suspension or expulsion (dismissal); otherwise in accordance with the record retention policy of the Office of Judicial Administrator
Enrollment verifications	<i>WCMC Registrar</i>	1 year from enrollment date
Financial aid records (applicants who enroll)	<i>WCMC Registrar</i>	5 years from graduation date
Grade sheets	<i>WCMC Registrar</i>	Permanent
Graduation lists	<i>WCMC Registrar</i>	Permanent
Hold or encumbrance authorizations	<i>Held by originating office</i>	Until released
Manual grade change forms	<i>WCMC Registrar</i>	Permanent
Name changes	<i>WCMC Registrar</i>	Permanent
Student registration forms-continuing education, summer sessions, and extramural studies	<i>WCMC Registrar</i>	1 year from registration
Term reports	<i>Appropriate department or college</i>	7 years
Transcript requests	<i>WCMC Registrar</i>	1 year from submission date
Transcripts	<i>WCMC Registrar</i>	Permanent
Transfer credit evaluations	<i>WCMC Registrar</i>	5 years from graduation
Veteran administration certifications	<i>WCMC Registrar</i>	5 years from graduation or date of last attendance
Withdrawal authorizations/leaves of absence	<i>WCMC Registrar</i>	2 years

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Admissions for Applicants Who Do Not Enroll, Whether Accepted or Rejected		
Applications for admission or readmission, correspondence that is relevant, entrance exam reports (ACT, CEEB, et.al.), letters of recommendation, transcripts — high school and other college	<i>WCMC Admissions</i>	2 years from date of start of application term
Admissions for Applicants Who Enroll		
Advanced placement records, applications for admission or readmission, correspondence that is relevant, entrance exam reports (ACT, CEEB, and et.al.)	<i>WCMC Registrar</i>	5 years from graduation or date of last attendance
International student forms (visa documentation, etc.)	<i>WCMC Registrar</i>	5 years
Letters of recommendation	<i>WCMC Registrar</i>	Until date of admission
Recruitment materials	<i>WCMC Registrar</i>	Until date of enrollment
Residency certificates	<i>WCMC Registrar</i>	Until date of enrollment
Residency change documents (nonresident to resident)	<i>WCMC Registrar</i>	5 years from graduation or date of last attendance
Student waivers for right of access (See letters of recommendation)	<i>WCMC Registrar</i>	Until graduation or date of last attendance
Transcripts — high school and other college	<i>WCMC Registrar</i>	5 years from graduation or date of last attendance
Publications, Statistical Data/Documents, and Reports		
Degree, grade, enrollment, and racial/ethnic statistics	<i>WCMC Registrar</i>	Permanent
Schedule of classes (institutional)	<i>WCMC Registrar</i>	Permanent
SUNY reports	<i>WCMC Registrar</i>	10 years
Catalogs	<i>WCMC Registrar</i>	Permanent
Commencement programs	<i>Office of Academic Affairs</i>	Permanent

Table 2
Repositories and Retention Periods for Non-Student-Related Records, Weill Cornell Campus Units

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic Personnel		
Academic search records	<i>See "Affirmative Action/Equal Opportunity" section</i>	
Annual conflict of interest disclosure statements	<i>Appropriate college officer</i>	3 years
Grievances	<i>WCMC Faculty Affairs</i>	No cause findings: 3 years from determination Cause findings, Permanent
Personnel files, appointment letters and forms	<i>See "Human Resources" section</i>	
Tenure or promotion dossiers	<i>WCMC Faculty Affairs</i>	If action approved, 3 years; If tenure denied, 3 years from end of term appointment
WCMC faculty documents (appointment, tenure, promotion)	<i>WCMC Faculty Affairs</i>	Permanent

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
WCMC Overseer decisions regarding academic personnel and designated executives	<i>Secretary of the WCMC Board of Overseers</i>	Permanent
Accounting and Finance		
Account reconciliations (balance sheet)	<i>WCMC Finance</i>	6 years
Accounting reports (monthly reports) schedules of department balances, transaction statements, account analysis statements, monthly and year-to-date salary and wage statements	<i>WCMC Finance</i>	6 full fiscal years
Accounts payable vouchers and attachments	<i>WCMC Finance</i>	6 full fiscal years
Accounts receivable statements, centrally generated	<i>WCMC Finance</i>	6 full fiscal years
Accounts receivable statements, unit-generated	<i>WCMC Finance</i>	6 full fiscal years
Annual financial reports and work papers	<i>WCMC Finance</i>	Permanent
APPS invoices	<i>WCMC Finance</i>	6 full fiscal years
Banking records, including deposit and withdrawal records, bank statements and reconciliation, voided and canceled checks	<i>WCMC Finance</i>	6 full fiscal years
Billing records	<i>WCMC Finance</i>	6 years
Board of Trustees audit committee minutes	<i>University Audit Office</i>	Permanent
Capital equipment records	<i>WCMC Finance</i>	Life of asset: records of equipment purchased on federal funds must be retained for three years after final disposition
Cash receipts	<i>WCMC Finance</i>	6 full fiscal years
Depreciation records	<i>WCMC Finance</i>	Life of asset
Effort certifications	<i>WCMC Research Compliance</i>	6 full fiscal years
Indirect cost and benefit rate calculations	<i>WCMC Finance</i>	7 years
Inventories	<i>WCMC Finance</i>	Life of asset
Journal entries and back-up documentation	<i>WCMC Finance</i>	6 full fiscal years
New account records and back-up documentation	<i>WCMC Finance</i>	6 full fiscal years after account closing
Payment authority authorizations	<i>WCMC Finance</i>	6 full fiscal years
Procurement card charge documentation	<i>WCMC Finance</i>	6 full fiscal years
Subsidiary ledgers (accounts payable, accounts receivable, etc.)	<i>WCMC Finance</i>	6 full fiscal years
Travel reimbursements and attachments	<i>WCMC Finance</i>	6 full fiscal years
University Audit work papers and reports	<i>University Audit Office</i>	6 years
Administration, General		
Correspondence/Email regarding legal matters, fiscal matters, administrative matters, and/or other non-routine messages/letters*	Content will determine the appropriate retention period and location of correspondence/email.	
Minutes and meeting proceedings	<i>Office generating minutes</i>	Permanent
Reports - annual, faculty, statistical, strategic, etc.	<i>Office of origin</i>	Permanent

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Affirmative Action/Equal Opportunity		
Academic search plans and statements	<i>WCMC Human Resources</i>	3 years
Academic search waivers	<i>WCMC Human Resources</i>	For permanent waivers, 3 years from date of appointment; For limited-term waivers, 3 years from satisfaction of subsequent search requirements or appointment termination
Affirmative action programs	<i>WCMC Human Resources</i>	3 years
Complaints of prohibited discrimination, protected status (including sexual) harassment and bias activity	<i>WCMC Human Resources</i>	Permanent
Conciliation agreements/orders on consent	<i>Office of the Vice Provost/WCMC Human Resources</i>	Permanent
Documents supporting other academic or nonacademic selection decisions (e.g., promotion, termination, compensation)	<i>Appropriate department</i>	3 years from effective date of decision
Federal and state-required statistics and reports	<i>WCMC Human Resources</i>	3 years
Investigated sexual harassment complaints and bias reports that are dismissed, or where parties do not pursue. Records of investigated complaints that result in finding of merit maintained permanently	<i>WCMC Human Resources</i>	3 years
Investigated sexual harassment complaints and bias reports that result in finding of merit	<i>WCMC Human Resources</i>	Permanent
Nonacademic search and hiring forms (Office of Workforce Diversity and Inclusion, copies of requisition forms, applicant flow cards, ACSS forms, search waivers, documentation of hiring decision forms)	<i>WCMC Human Resources</i>	3 years from date of appointment
Nonacademic search materials and documents supporting hiring selection decisions	<i>Appropriate department</i>	3 years from date of appointment
Alumni Affairs and Development		
Alumni records	<i>WCMC Alumni Affairs and Development</i>	Permanent
Gift records	<i>WCMC Development</i>	7 years
Gifts of art to the Johnson Museum	<i>WCMC Development</i>	Permanent
Original gift letter agreements, all others	<i>WCMC Development</i>	Permanent
Original gift letter agreements, signed by the President and the donor	<i>Office of University Counsel</i>	Permanent
Planned gifts (trusts, life income, agreements, annuities), real estate gifts	<i>WCMC Development</i>	Permanent
Bursar		
Cashier reports	<i>WCMC Finance</i>	6 years
Disclosure statements	<i>WCMC Finance</i>	3 years after account has been paid in full

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Student loan records	<i>WCMC Finance</i>	3 years after the loan has been repaid in full
Tuition and fee charges	<i>WCMC Finance</i>	6 years
Construction		
Construction documentation, itemized list of these items maintained by Project Design and Construction	<i>WCMC Capital Planning</i>	Permanent
Contracts and agreements	<i>WCMC Capital Planning</i>	Permanent
Corporate Records		
Accreditation records	<i>Office of Academic Affairs</i>	Permanent
Board of Trustee minutes	<i>Secretary of the WCMC Board of Overseers</i>	Permanent
Bylaws	<i>Secretary of the WCMC Board of Overseers</i>	Permanent
Charter	<i>Secretary of the WCMC Board of Overseers</i>	Permanent
Environmental Health and Safety		
Confined space entry – completed permits	<i>WCMC Environmental Health and Safety</i>	1 Year
Evacuation drill records	<i>WCMC Environmental Health and Safety</i>	5 years
Exposure monitoring records	<i>WCMC Environmental Health and Safety</i>	30 years
Fire protection systems records	<i>WCMC Environmental Health and Safety</i>	5 years
Fume hood testing records	<i>WCMC Environmental Health and Safety</i>	3 years
Hazardous waste disposal manifests and reports	<i>WCMC Environmental Health and Safety</i>	3 years
Homeland security chemical lists	<i>WCMC Environmental Health and Safety</i>	3 years
Incident records	<i>WCMC Environmental Health and Safety</i>	5 years
Injury and illness reports	<i>WCMC Environmental Health and Safety</i>	5 years
OSHA training records	<i>WCMC Environmental Health and Safety</i>	Until end of employment
Radiation dose reports	<i>WCMC Environmental Health and Safety</i>	Permanent
Radiation safety training records	<i>WCMC Environmental Health and Safety</i>	3 years
Radioactive material receiving and inventory records	<i>WCMC Environmental Health and Safety</i>	3 years
Radioactive materials license and safety committee records	<i>WCMC Environmental Health and Safety</i>	Permanent

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Select agent records and correspondence	<i>WCMC Environmental Health and Safety</i>	Permanent
Human Resources		
Employee personnel files (including application, resume, payroll, appointment/salary forms)	<i>WCMC Human Resources</i>	6 years after termination
Federal reporting requirements: welfare benefits and other fringe benefit plans (i.e., 5500-s)	<i>WCMC Human Resources</i>	Permanent
I-9 Forms (faculty and staff)	<i>WCMC Human Resources</i>	3 years, or 1 year after termination (whichever is greater)
I-9 Forms (students)	<i>WCMC Human Resources</i>	3 years, or 1 year after termination (whichever is greater)
Individual contracts of employment	<i>WCMC Human Resources</i>	6 years after termination
Occupational injury or illness, records relating to	<i>WCMC Human Resources</i>	5 years
Performance appraisals	<i>Departmental personnel files</i>	3 years
Search committee records, including employment applications, resumes, and all applicant search materials	<i>Departmental personnel files</i>	3 years
Union agreements	<i>WCMC Human Resources</i>	Permanent
Volunteer registration forms, parental consent forms, and agreements	<i>Appropriate department</i>	3 years
Workers' compensation claims and insurance policies	<i>WCMC Human Resources and WCMC Risk Management</i>	18 years
Insurance		
Certificates of insurance, indemnification agreements, hold-harmless agreements, contracts	<i>Appropriate unit</i>	If no claim is presented, 3 years after activity is completed If claim is presented, turn over to Office of Risk Management and Insurance
Incident reports, accident reports	<i>WCMC Risk Management and Insurance</i>	4 years after report date or until claim is settled or closed
Insurance policies (liability, property, and other policies)	<i>WCMC Risk Management and Insurance</i>	Permanent
Legal		
Consent orders	<i>Office of the University Counsel</i>	Permanent
Court orders	<i>Office of the University Counsel</i>	Permanent
Judgments	<i>Office of the University Counsel</i>	Permanent
Releases	<i>Office of the University Counsel</i>	Permanent
Settlements	<i>Office of the University Counsel</i>	Permanent
WCMC medical professional liability claims/cases/judgments/settlements	<i>New York Presbyterian Hospital Legal Affairs</i>	Permanent

POLICY 4.7

Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Library		
Circulation records, excluding special collections	<i>WCMC Library</i>	Retained until items are returned and discharged
Circulation records for special collections	<i>WCMC Library</i>	Permanent
Library Annex location records	<i>WCMC Library</i>	Permanent
Library catalog	<i>WCMC Library</i>	Permanent
License agreements	<i>WCMC Library</i>	7 yrs. from expiration or termination of agreement
Memoranda of understanding/deeds of gift	<i>Appropriate department</i>	Permanent
Medical		
HIPAA-related forms	<i>WCMC Privacy Office</i>	7 Years
WCMC Clinical Patient Records	<i>Appropriate department</i>	Minors or Obstetrical: to age 21 All others: 7 Years
WCMC patient billing records	<i>Appropriate department</i>	7 years
Inventions and Related Property Rights		
Foreign patent/application-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Licensing agreement-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	6 years from expiration or termination of agreement
Original executed invention disclosure forms	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original executed licensing agreements	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original executed United States Patent and Trademark Office (USPTO) assignment forms	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original letters, patents	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Original registered trademarks	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
Royalty records	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Life of technology/ patent or TM, plus 6 years
Trademark-related work papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
U.S. patent/application correspondence papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	Permanent
U.S. patent/application filing papers	<i>Cornell Center for Technology Enterprise and Commercialization</i>	1 year after issuance or abandonment
Payroll		
Annual payment records (W-2, alpha lists, employee transaction lists)	<i>WCMC Payroll</i>	7 years
Imputed income records (auto usage, CCTS, etc.)	<i>WCMC Payroll</i>	7 years
Information returns filed with federal and state authorities (W-2, 941, 1042-S, etc.)	<i>WCMC Payroll</i>	7 years
Labor distribution adjustment records	<i>WCMC Payroll</i>	6 full fiscal years
Leave reporting records EX	<i>Appropriate department</i>	4 years
Leave reporting records NEX	<i>WCMC Payroll</i>	7 years
Payroll deduction authorization forms (W-4, IT-2104, garnishments, etc.)	<i>WCMC Payroll</i>	7 years
Payroll vouchers	<i>WCMC Payroll</i>	7 years
Record of payments and deductions (payroll registers, deductions lists, adjustments)	<i>WCMC Payroll</i>	7 years
Time cards, other	<i>Appropriate department</i>	7 years
Time cards, student	<i>Appropriate department</i>	7 years
Wage assignment orders	<i>WCMC Payroll</i>	7 years
Pension		
Employee eligibility for pension	<i>WCMC Human Resources</i>	6 years after death of eligible employee and beneficiary
Employee personal information (name, address, social security number, period of employment)	<i>WCMC Human Resources</i>	6 years after death of eligible employee and beneficiary
Employee service records	<i>WCMC Human Resources</i>	6 years after death of eligible employee and beneficiary
Pension paid to employees or their beneficiaries	<i>WCMC Human Resources</i>	6 years after death of employee and beneficiary
Pension plans and all attached amendments	<i>WCMC Human Resources</i>	Permanent
Pensions or pension plans filed with the Department of Labor and the Internal Revenue Service	<i>WCMC Human Resources</i>	Permanent
Plan administrator setting forth authority to pay, records of	<i>WCMC Human Resources</i>	Permanent
Planning and Budget		
Plans and projections	<i>WCMC Planning</i>	Permanent
Police Department, Cornell University		
Accident reports	<i>New York Presbyterian Security Office</i>	4 years after report date

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Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Crime reports	<i>New York Presbyterian Security Office</i>	4 years after report date
Property damage reports	<i>New York Presbyterian Security Office</i>	4 years after report date
Policy, University		
University policies	University Policy Office	Permanent
Purchasing		
Purchase orders, contracts, agreements	<i>WCMC Purchasing</i>	7 full fiscal years
Real Property		
Abstracts of title	<i>WCMC Capital Planning</i>	Until disposal of property
Documents for leases, licenses, construction contracts and other contracts of a temporary nature, valued at less than \$50,000	<i>WCMC Capital Planning</i>	6 years after expiration of lease or contract term
Property deeds, easements, licenses, rights of way, leases, rights of first refusal, remainder interests, mortgages, survey maps	<i>WCMC Capital Planning</i>	Permanent
Real property tax exemption applications and renewal forms filed with assessors	<i>WCMC Capital Planning</i>	6 years
Title insurance policies	<i>WCMC Capital Planning</i>	10 years after disposal of property
Sponsored Projects Contracts, Grants		
Grant and contract proposals, awards, agreements and supporting documentation	<i>WCMC Research and Sponsored Programs</i>	6 years after close of grant for New York State 3 years after close of grant for all other grants and contracts
Research Integrity and Assurance		
Animal welfare records	<i>WCMC Research and Sponsored Programs</i>	3 years or contract period
Conflict of interest and commitment records	<i>WCMC Research and Sponsored Programs</i>	5 years after the grant period has ended
Export control records	<i>WCMC Research and Sponsored Programs</i>	5 years after the grant period has ended
Institutional biosafety committee records, including biohazardous agents, recombinant DNA molecules, gene therapy	<i>WCMC Research and Sponsored Programs</i>	5 years after the grant period has ended
Institutional review board for human participants records	<i>WCMC Research and Sponsored Programs</i>	5 years after grant period has ended for the full record Permanent for selected records
Scientific misconduct records	<i>WCMC Research and Sponsored Programs</i>	10 years after the grant period has ended
Tax		
Assets: acquisition/disposition	<i>See "Accounting and Finance" section</i>	

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Depreciation schedules	<i>See "Accounting and Finance" section</i>	
Excise tax returns	<i>WCMC Finance</i>	7 years
Fringe benefit returns	<i>See "Human Resources" section</i>	
Income tax returns (990-T, CT-13, etc.)	<i>WCMC Finance</i>	Permanent
Information return (990)	<i>WCMC Finance</i>	Permanent
Information returns (1099, 8282, 90.22, etc.)	<i>WCMC Finance</i>	7 years
Payroll tax returns (W-2, social security, unemployment tax)	<i>See "Payroll" section</i>	
Pension tax returns	<i>See "Pension" section</i>	
Property tax returns	<i>See "Real Property" section</i>	
Sales tax returns	<i>WCMC Finance</i>	6 years

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Retention of University Records

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