



Retention of University Records

Volume: 4, Governance/Legal
Chapter: 7, Retention of University
Records
Responsible Executive: General
Counsel
Responsible Office: General
Counsel/Division of Rare and
Manuscript Collections: Cornell
University Library
Originally Issued: March 1997
Last Updated: October 23, 2024

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

POLICY 4.7

Retention of 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 | General 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 | General 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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Retention of University Records

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:

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

1. Review records to be sent to University Archives
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,

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

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 General 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 General 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 General 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 Student Conduct and Community Standards</i> | Permanent |
| Disciplinary records (findings of violation and related case files), where penalty imposed is probation | <i>Office of Student Conduct and Community Standards</i> | Permanent, unless otherwise indicated by the <i>Office of Student Conduct and Community Standards</i> |
| 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 Student Conduct and Community Standards</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 Student Conduct and Community Standards</i> | No requirement to retain |

POLICY 4.7
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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 Student Conduct and Community Standards</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 |
|---|--|--|

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|--|--|
| 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 |
| 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</i> | If action approved, 3 years; If tenure denied, 3 years from end of term appointment |

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|--|---|
| 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 |
| 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 |

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|---|
| 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 |
| 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 Institutional Equity; 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 Institutional Equity, 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 Institutional Equity</i> | 3 years |
| Conciliation agreements/orders on consent | <i>Office of Institutional Equity</i> | Permanent |

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PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|----------------------------------|
| 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 Institutional Equity</i> | 3 years |
| Nonacademic search and hiring forms | <i>Requisitions, applicant EEO identification, search waiver documents, and documentation of hiring decision, Office of Institutional Equity; 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 Institutional Equity</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 Institutional Equity</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 General 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

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Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|---|
| Construction documentation | fcs.cornell.edu/services/building-information-documents/archiving-services | Permanent |
| Contracts, agreements, and certificates of insurance | FCS-EPA – Facilities Contracts | 10 years or longer, as deemed appropriate |
| 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>Environment, Health and Safety</i> | 1 Year |
| Evacuation drill records | <i>Environment, Health and Safety</i> | 5 years |
| Exposure monitoring records | <i>Environment, Health and Safety</i> | 30 years |
| Fire protection systems records | <i>Environment, Health and Safety</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>Environment, Health and Safety</i> | 3 years |
| Incident records | <i>Environment, Health and Safety</i> | 5 years |
| Injury and illness reports | <i>Environment, Health and Safety</i> | 5 years |
| OSHA training records | <i>Environment, Health and Safety</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>Select Agent Program Responsible Official</i> | 3 years |
| 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 |
| Occupational injury or illness, records relating to | <i>Division of Human Resources</i> | 5 years |

POLICY 4.7

Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|--|--|
| 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 General Counsel</i> | Permanent |
| Court orders | <i>Office of the General Counsel</i> | Permanent |
| Judgments | <i>Office of the General Counsel</i> | Permanent |
| Releases | <i>Office of the General Counsel</i> | Permanent |
| Settlements | <i>Office of the General 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>Cornell Health</i> | 30 years after person leaves the university |
| Gannett Health Services patient records -Non-regulatory / Non-occupational medicine | <i>Cornell Health</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>Cornell Health</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 Licensing</i> | Permanent |
| Licensing agreement-related work papers | <i>Cornell Center for Technology Licensing</i> | 6 years from expiration or termination of agreement |
| Original executed invention disclosure forms | <i>Cornell Center for Technology Licensing</i> | Permanent |
| Original executed licensing agreements | <i>Cornell Center for Technology Licensing</i> | Permanent |
| Original executed United States Patent and Trademark Office (USPTO) assignment forms | <i>Cornell Center for Technology Licensing</i> | Permanent |
| Original letters, patents | <i>Cornell Center for Technology Licensing</i> | Permanent |
| Original registered trademarks | <i>Cornell Center for Technology Licensing</i> | Permanent |
| Royalty records | <i>Cornell Center for Technology Licensing</i> | Life of technology/ patent or TM, plus 6 years |
| Trademark-related work papers | <i>Cornell Center for Technology Licensing</i> | Permanent |
| U.S. patent/application correspondence papers | <i>Cornell Center for Technology Licensing</i> | Permanent |
| U.S. patent/application filing papers | <i>Cornell Center for Technology Licensing</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 |

POLICY 4.7
Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|--|--|
| Payroll deduction authorization forms (W-4, IT-2104, garnishments, etc.) | <i>University Payroll Office</i> | 7 years |
| 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 |
| Division of Public Safety, Cornell University | | |
| Incident reports | <i>Cornell University Police</i> | 3 years to Permanent, depending on type of incident |
| Crime reports | <i>Cornell University Police</i> | Permanent |
| Property damage reports | <i>Cornell University Police</i> | Permanent |
| Recorded Video | <i>Access Control Program</i> | 14 days |
| Card Access Events | <i>Access Control Program</i> | 3 years |
| 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>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>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>Real Estate</i> | Permanent |

POLICY 4.7
Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|---|---|
| Real property tax exemption applications and renewal forms filed with assessors | <i>Real Estate</i> | 6 years |
| Title insurance policies | <i>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 (including filing of final financial report) for federal and 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 |

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Retention of University Records

PROCEDURES – ITHACA CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|--------------------------------------|-----------------|
| 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

POLICY 4.7

Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

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 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 General 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 General 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.

POLICY 4.7 Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

◆**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 General 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.

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 Student Conduct and Community Standards |
| 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 |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|--|--|
| 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 |
| 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 | | |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

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

Accounting and Finance

| | | |
|---|--------------------------|---|
| Account reconciliations (balance sheet) | WCMC Finance | 6 years |
| Accounting reports (monthly reports) schedules of department balances, transaction statements, account analysis statements, monthly and year-to-date salary and wage statements | WCMC Finance | 6 full fiscal years |
| Accounts payable vouchers and attachments | WCMC Finance | 6 full fiscal years |
| Accounts receivable statements, centrally generated | WCMC Finance | 6 full fiscal years |
| Accounts receivable statements, unit-generated | WCMC Finance | 6 full fiscal years |
| Annual financial reports and work papers | WCMC Finance | Permanent |
| APPS invoices | WCMC Finance | 6 full fiscal years |
| Banking records, including deposit and withdrawal records, bank statements and reconciliation, voided and canceled checks | WCMC Finance | 6 full fiscal years |
| Billing records | WCMC Finance | 6 years |
| Board of Trustees audit committee minutes | University Audit Office | Permanent |
| Capital equipment records | WCMC Finance | Life of asset: records of equipment purchased on federal funds must be retained for three years after final disposition |
| Cash receipts | WCMC Finance | 6 full fiscal years |
| Depreciation records | WCMC Finance | Life of asset |
| Effort certifications | WCMC Research Compliance | 6 full fiscal years |
| Indirect cost and benefit rate calculations | WCMC Finance | 7 years |
| Inventories | WCMC Finance | Life of asset |
| Journal entries and back-up documentation | WCMC Finance | 6 full fiscal years |
| New account records and back-up documentation | WCMC Finance | 6 full fiscal years after account closing |
| Payment authority authorizations | WCMC Finance | 6 full fiscal years |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|--|
| 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 |
| 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 |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|--|
| 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 General 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 |
| 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 |

POLICY 4.7

Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|-------------------------|
| 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 |
| 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 |
|--|-------------------------|--|

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|---|
| 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 General Counsel</i> | Permanent |
| Court orders | <i>Office of the General Counsel</i> | Permanent |
| Judgments | <i>Office of the General Counsel</i> | Permanent |
| Releases | <i>Office of the General Counsel</i> | Permanent |
| Settlements | <i>Office of the General Counsel</i> | Permanent |
| WCMC medical professional liability claims/cases/judgments/settlements | <i>New York Presbyterian Hospital Legal Affairs</i> | Permanent |
| 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 |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|---|--|
| 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>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 |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|--|--|--|
| 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 |
| 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 |

POLICY 4.7
Retention of University Records

PROCEDURES – WEILL CORNELL CAMPUS UNITS, CONTINUED

| TYPE OF RECORD | OFFICIAL REPOSITORY | DURATION |
|---|---|--|
| 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> | |
| 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 |