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## Records Management

This retention schedule is authorized under Policy 5.21 Records Management.

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

*Title* Chemical and Hazardous Waste Disposal Records

*Description* This series documents the receipt, shipment, and disposal of chemical material or hazardous waste. This series may include, but is not limited to: chemical and waste inspection forms; drum packing sheets; Uniform Hazardous Waste Manifest forms (EPA 8700); vendor certificates of disposal; land disposal notifications; and waste disposal records.

*Retention* Retain 3 years from end of calendar year.

*Disposition* Confidential destruction is required.

*Citations* 40 CFR 262.23 (f)(4); Ga. Comp. R. & Regs. r. 391-3-11-.08 (3)(s1a); Ga. Comp. R. & Regs. r. 391-3-11-.08 (3)(s1b);

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*Title* Coding Manuals

*Description*

*Retention* Six years from date materials replaced or updated.

*Disposition* Confidential destruction not required.

*Citations*

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*Title* Compliance Activity Reports

*Description* Reports which generally summarize compliance activities to the Board of Directors or from the Compliance Liaisons to the Compliance Officer.

*Retention* Retain for six years from the date materials replaced or updated then dispose of.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Compliance Audit Records

*Description*

*Retention* Retain for seven years after audit then dispose of.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Compliance Inquiries Records

*Description*

*Retention* Unless custody has been transferred to HHS under paragraph (c) of this section, or ORI has advised the institution in writing that it no longer

*Disposition* Confidential destruction is required.

*Citations* 42 CFR 93.317 (b);

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*Title* Compliance Investigations Records

*Description*

*Retention* Unless custody has been transferred to HHS under paragraph (c) of this section, or ORI has advised the institution in writing that it no longer

*Disposition* Confidential destruction is required.

*Citations* 42 CFR 93.317 (b);

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*Title* Compliance Log  
*Description* Hotline calls reporting occurrences (retired logs).

*Retention* Retain for six years after the last date of entry then dispose of.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Compliance Manual

*Description*

*Retention* Retain for six years after superseded then dispose of.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Compliance Records

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

*Retention* Retain for five years after administrative usefulness is completed then dispose of.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Contributor Records

*Description*

*Retention* If there is a condition attached to the contribution then retain permanently. Retain for six years after the date of filing for tax audits then dispose

*Disposition* Confidential destruction is required.

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

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*Title* Environmental Health and Safety Training Records

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

*Retention* Retain 3 years from end of academic year.

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Environmental Regulation Reports

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

*Retention* Permanent

*Disposition* Records are ineligible for transfer to University Archives.

*Citations*

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*Title* Hazardous Materials  
*Description* This series documents off-site shipping of hazardous materials.

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

*Disposition* Confidential destruction is required.

*Citations*

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*Title* Insurance Fund Claims

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

*Retention* Retain for five years after claim paid or denied.

*Disposition* Confidential destruction is required.

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

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*Title* Material Safety Data Sheet Records

*Description* This series documents the university's hazardous chemicals as mandated by the Hazardous Communications Program of the Occupational Safety and Health Administration (OSHA). This series may include, but is not limited to: safety data sheets which list chemical name, description, composition, intended use, flash point, transportation, hazards, safe handling, and extinguishing methods.

*Retention* Retain 30 years from end of academic year.

*Disposition* Confidential destruction is required.

*Citations* 29 CFR 1910.1020 (d)(1)(ii)(B),(iii);

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*Title* MDR Reportable Events

*Description*

*Retention* Retain for ten years after date of event then dispose of.

*Disposition* Confidential destruction is required.

*Citations* 21 CFR 803.18 (c); 21 CFR 803.18 (c),(d)(2)(S1); 21 CFR 803.18 (c),(d)(2)(S2);

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*Title* Medical Device Tracking Records

*Description*

*Retention* Retain records for the useful life of each tracked device manufacture or distribute then dispose of. The useful life of a device is the time a device

*Disposition* Confidential destruction is required.

*Citations* 21 CFR 821.60;

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*Title* Medical Waste Manifests

*Description*

*Retention* Permanent

*Disposition* Records are ineligible for transfer to University Archives.

*Citations* Ga. Comp. R. & Regs. r. 391-3-4-.06 (3)(d)(12);

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<i>Title</i>	Radiation Licensing Records
<i>Description</i>	This series documents licensing to receive, use, store, dispose of, and ship radioactive materials and to provide a record of the reception, handling, shipment, and disposal of radioactive material or radioactive hazardous wastes. This series may include, but is not limited to: waste material pick up requests and tags; radioactive waste drum inventory forms; uniform hazardous waste manifest forms; radiation waste shipment and disposal manifest forms; radiation material inventory sheets; radiation material shipment receipt record forms; waste disposal record cards; disposal site letters of arrival acknowledgment; and sewerred radioactive material log sheets.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records an ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(d); Ga. Comp. R. & Regs.

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<i>Title</i>	Radiation Monitoring and Exposure Records
<i>Description</i>	This series documents radiation testing and monitoring of employees, visitors, facilities, and the surrounding environment. This series may include, but is not limited to: dosimeter reports; exposure history; statement of occupational radiation dosage; and procurement for material records.
<i>Retention</i>	Permanent
<i>Disposition</i>	Records an ineligible for transfer to University Archives.
<i>Citations</i>	Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(b)(2)(s2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(1); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(c)(2); Ga. Comp. R. & Regs. r. 391-3-17-.03 (14)(d); Ga. Comp. R. & Regs.

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

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*Title* Risk Management Records

*Description* Records that document insurance policies and claims dealing with liability or loss from damage. File may include correspondence, reports, policies, claims and other related records.

*Retention* Retain for five years after claim is paid or denied then dispose of.

*Disposition* Confidential destruction is required.

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

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*Title* Safe Medical Act Device Reports

*Description*

*Retention* Permanent

*Disposition* Records an ineligible for transfer to University Archives.

*Citations*

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