



# NSU Records Management & Destruction Policy

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**Policy Applies to:** All NSU Academic and Administrative Units, administrators, faculty, employees, staff, and all NSU Health/Mental Health Care Centers/Clinics/Institutes/Departments.

## **I. Purpose**

To utilize reasonable efforts to ensure that Nova Southeastern University (“NSU”) adheres to applicable laws and regulations, accreditation standards, and operational and administrative requirements governing the management, retention and destruction of Records.

## **II. Policy Statement**

All members of the NSU Workforce are responsible for the proper creation, use, maintenance, preservation, and disposal/destruction of NSU Records in accordance with this Policy.

The goals of the NSU Records Management & Destruction Policy include, but are not limited to:

- To utilize reasonable efforts to ensure adherence to Federal and State laws and regulations;
- To incorporate professional standards for Records accountability, integrity, protection, compliance, availability, retention, disposition, and transparency;
- To maintain complete, accurate, and quality Records;
- To utilize efficient and cost-effective Records management techniques and technologies;
- To promote the responsible management of Records by avoiding the unnecessary accumulation of Records past their usefulness;
- To preserve original documentation of Records determined to hold unique legal and/or corporate value to NSU; and
- To preserve the University’s history.

## **III. Definitions**

**Active Records:** Those Records that still have sufficient administrative, fiscal, legal, medical, and/or historical value. They are consulted frequently and must be conveniently available for that purpose.

**Archival Material:** Those Records or materials determined to be of enduring value that are preserved and maintained in the University Archives.

**Certificate of Destruction:** A record that documents the disposal of specific records in conformity with an organization’s formally established retention policies and schedules.

**Confidential Record:** Document(s) containing any information that is the property of the University and would cause financial, reputational or other harm to the University if disclosed to unauthorized persons, either because of legal or business concerns.

**Department Designee:** The Department Designee is the individual designated by the Department Head/Manager and is responsible for overseeing and managing the implementation of this Policy for their respective Academic or Administrative Unit, and serves as the primary liaison to the NSU Records Manager. The responsibilities of the Department Designee are described further in Section IX.A. of this Policy.

Document Imaging: Images produced by document scanners and recorded onto computer storage media for retrieval, distribution, or other purposes.

Disposal and/or Destruction of Records: Any action that prevents the recovery of information from the storage medium on which it is recorded including, but not limited to, cross-shredding, pulverizing, incineration, erasure, and destruction of the medium and/or hardware used to store and/or recover the information contained therein.

Electronic Record: Recorded, machine-readable information maintained on magnetic tape or other storage Media. Electronic records include numeric, graphic, audio, video, and textual information that is recorded or transmitted in analog or digital form, such as electronic spreadsheets, word processing files, databases, electronic mail, instant messages, scanned images, digital photographs, and multimedia files.

Electronic Recordkeeping System: An automated information system for the organized collection, processing, transmission, and dissemination of information.

File-Level Inventory: A listing of each file within each box or container used to store Records (e.g., file cabinet or storage box).

Inactive Record: Those Records that are no longer needed to conduct current business, have lost some of their administrative, fiscal, legal, and/or historical value, or have been superseded by new Records, but must be retained until the end of their specified retention period. These are Records that are usually referenced or accessed infrequently and may be held for short or permanent duration.

Litigation Hold: A temporary suspension of destruction for Records that may be relevant to an internal or external investigation or audit, a lawsuit, an administrative proceeding, or some other form of legal proceeding. See Section V.F.

Medical Record: The Florida Statutes regulating practitioners and non-hospital facilities generally defines Medical Records/Patient Records as information generated from a physical or mental examination of, or administering treatment or dispensing legend drugs to, any person. The Medical Record may include Records maintained in an Electronic Medical Record System.

The Medical Record may also be known as the "Legal Medical Record," in that it serves as the documentation of healthcare services provided to a patient and/or client by a NSU Health/Mental Health Care Center/Clinic/Institute/Department healthcare provider and can be certified by the applicable NSU Health/Mental Health Care Center/Clinic/Institute/Department Record Custodian(s) as such.

The Medical Record excludes health records that are not official business records of NSU Health/Mental Health Care Centers/Clinics/Institutes/Departments, such as personal health records managed by the patient/client.

The Medical Record also generally excludes Records from non-NSU providers (e.g., health information that was not documented during the normal course of business at a NSU Health/Mental Health Care Center/Clinic/Institute/Department or by an NSU healthcare provider. However, if information from another provider, healthcare facility, or personal health record is used in providing patient care or making medical decisions, it may be considered part of the NSU Health/Mental Health Care Center/Clinic/Institute/Department Legal Medical Record, and may be subject to disclosure upon a subpoena or a specific request for same.

NSU Workforce: For purposes of this Policy, NSU Workforce members are defined as individuals who directly or indirectly perform work on behalf of NSU, regardless of whether efforts are compensated by the University.

Office of Record: The Academic or Administrative Unit or Department charged with the responsibility of maintaining, and in certain instances, disclosing or producing, the Record Copy of a particular Record.

Retention of a Record in an Electronic Recordkeeping System does not eliminate the Office of Record's recordkeeping responsibility.

Original Medical Record: A primary or first-generation version of a Medical Record.

Original Record: A primary or first-generation Record.

Paper Record: A Record in paper form, including, but not limited to, office files, business forms, engineering drawings, charts, maps, and computer print outs.

Permanent Record: Recorded information determined to have sufficient historical, administrative, legal, fiscal, and/or other value to warrant preserving same for an indefinite period. Permanent Records are identified as such in the NSU Records Retention Schedule.

Protected Health Information: The Privacy Regulations protect all "*individually identifiable health information*" maintained or transmitted by a covered entity or its business associate, in any form or medium, whether electronic, paper, or oral. The Privacy Regulations call this information "protected health information ('PHI')."

"Individually identifiable health information" is information, including demographic data, that is created or received by a healthcare provider, health plan, employer, or healthcare clearinghouse, and that relates to:

- The individual's past, present, or future physical or mental health condition;
- The provision of healthcare to the individual; or
- The past, present, or future payment for the provision of health care to the individual,

and that identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual. Individually identifiable health information includes many common identifiers (e.g., name, address, birth date, Social Security Number).

Record: Recorded, retrievable information, regardless of medium or characteristics, created or received in connection with the University's business, operations, activities, and/or legal obligations.

Records include, but are not limited to, original documents, papers, correspondence, meeting minutes, memorandums, reports, contracts, receipts, requisitions, invoices, books, general ledgers, financial statements, blueprints, charts, maps, drawings, presentation slides, x-rays, photographs, website pages, audio or video recordings, microfilm, magnetic tape, instant messages, or other forms of recorded information.

Record Copy: The official copy of a Record that is retained for legal, operational, business, and/or historical purposes.

Records Manager: An individual specifically tasked with the responsibility of administering the NSU Records Management & Destruction Policy. This responsibility will be assigned to an individual with records management skills or the ability to learn the skills necessary to oversee this Policy. The responsibilities of the Records Manager are described further in Section IX.A. of this Policy.

Records Retention Schedule: A schedule of standard and/or legally required retention periods for each type of Record, taking into account the administrative, fiscal, legal, medical, and historical value of those Records. The Records Retention Schedule is hereto attached to this Policy as Attachment "A."

Retention Period: The period of time during which Records must be maintained by the University because the Records have administrative, fiscal, legal, medical, historical and/or other significant value. The Records are eligible for disposal at the end of the retention period, subject to the appropriate authorization as described in this Policy.

Review Date: The retention Trigger Date, as defined below, plus the length of time Records must be retained, pursuant to the NSU Records Retention Schedule.

Example: If the Records Retention Schedule states that a particular Record is to be retained “four (4) years after the end of the fiscal year,” “end of the fiscal year” is the Trigger Date for the commencement of the retention period. To continue the example, if the Records are from fiscal year 2013, the Review Date would be June 30, 2017 (the end of fiscal year 2013 plus four (4) years).

Senior Administrator: The Vice President, Dean, Executive Director, or highest-designated individual of the applicable NSU College or Division.

Sensitive Personal Information: Information that can be used to identify an individual and/or an individual's financial account(s), credit history, or credit cards, as well as individual medical record and health plan information. This includes an individual's social security number, first name (or initial) plus last name along with his/her driver's license number or state identification card number, financial account numbers, and/or credit card number.

Trigger Date: The date of an event, action, or cut-off point that prompts the commencement of the retention period, pursuant to the NSU Records Retention Schedule.

Example: If the Records Retention Schedule states that a particular Record is to be retained “four (4) years after the end of the fiscal year,” “end of the fiscal year” is the Trigger Date for the commencement of the retention period. To continue the example, if the Records are from fiscal year 2013, the retention Trigger Date would be June 30, 2013 (the end of fiscal year 2013).

Vital Record: Those Records, regardless of medium, that are deemed essential to the continuing operation of the University. See Section IV.F.

#### **IV. Maintenance of Records**

NSU generates, manages and utilizes a wide variety of University Records to conduct its affairs and to support its educational mission. All NSU Workforce members share an equal responsibility to properly manage and retain such Records in accordance with the procedures outlined in this Policy. Thus, the purpose of this section is to utilize reasonable efforts to ensure that Records are properly and securely managed, stored, and retained to enable Records to be easily located and retrieved.

For specific information regarding the maintenance and storage of Electronic Records, see Section VI. of this Policy.

For specific information regarding the maintenance and storage of Medical Records and Records that contain Protected Health Information, see Section VII. of this Policy.

##### **A. Records**

Records shall be maintained and stored, either on-site or off-site, in accordance with the procedures outlined in this Policy and for the time designated in the **NSU Records Retention Schedule, attached hereto as Attachment “A.”**

In addition to the Records maintenance and retention procedures set forth in this Policy, individual Academic and Administrative Units may establish additional standards for the maintenance and organization of specific categories of Records. However, Academic and Administrative Units must, at a minimum, comply with all standards set forth in this Policy, including the mandatory minimum timeframes for retention set forth in the NSU Records Retention Schedule, irrespective of any additionally established standards.

## **B. Record Ownership**

Records created or received during the normal course of University business are the sole and exclusive property of NSU. As such, no member of the NSU Workforce, regardless of his or her position therein, has any personal or property right to such Records, even if he or she generated, developed or compiled them.

Any individual departing the NSU Workforce is required to leave all Records (including copies or drafts of such Records) for any successor(s) and/or supervisor(s). The individual may not depart with or destroy any Records prior to his or her departure from the University.

Nothing in this Policy is intended to assume ownership, liability, or responsibility for the retention and/or destruction of any materials belonging to any institutions other than NSU. The scope of this Policy applies only to NSU Records and NSU Workforce members who create, manage, utilize, or receive NSU Records.

## **C. Record Integrity**

No one may falsify or inappropriately alter information contained in any Record or document. Additionally, the unauthorized use, removal, destruction or disclosure of any NSU Record is strictly prohibited. NSU Workforce members who violate this Policy may be subject to disciplinary and/or legal action.

## **D. Permanent Records**

Permanent Records are Records for which the appropriate retention period is described as "Permanent" in the corresponding NSU Records Retention Schedule, Attachment "A" to this Policy, and which are to be retained indefinitely. Unless otherwise indicated on the Records Retention Schedule, each Academic and Administrative Unit is ultimately responsible for maintaining and preserving the Permanent Records generated and/or received therein. As such, Academic and Administrative Units are responsible for ensuring that Permanent Records are securely and adequately stored and maintained in an environment with appropriate safeguards in place to preserve the Records over a prolonged period of time. Where possible, Permanent Records should be created in, or transferred to, an immutable and durable medium to safeguard against inappropriate alteration or deterioration.

Additionally, Permanent Records must be organized and indexed in such a manner to enable such Records to be easily located upon request. Department Designees shall be responsible for creating and maintaining a file-level inventory list of all Permanent Records that are maintained within their respective Academic or Administrative Units by using a format approved by the NSU Records Manager. A copy of this file-level inventory list shall be securely maintained by the Senior Administrator of the Division or College and/or the Department Head/Manager of the Academic or Administrative Unit, with a copy provided to the NSU Records Manager. If the Permanent Records are stored off-site, the box- and file-level inventories will be maintained on the approved, recordkeeping platform (e.g., IMConnect and Long Description Field).

## **E. Historical Archives**

Archival Materials include, but are not limited to, institutional reports, manuscripts, course catalogs, commencement books, University publications, presidential papers, plaques, blueprints, scrapbooks, photographs, portraits, memorabilia, and any other material illustrating or documenting significant, historical University events. NSU Workforce members who generate, possess or discover any Archival Material or other items of historically significant value shall contact NSU Archives.

## **F. Vital Records**

Vital Records are Records deemed essential to the continuing operation of the University, which, if destroyed, would seriously impair or disrupt normal University affairs or, which by virtue of their loss or destruction, might place the University in a state of legal or fiscal jeopardy. Academic and Administrative Units have the primary responsibility of ensuring that Vital Records are maintained in locations with adequate security and environmental protections on a continuing basis, regardless of the media format on which they are stored. If not otherwise cost-prohibitive or infeasible, appropriate safeguards for Vital Records include off-site duplication or image scanning. It is important to note that a Record's retention period does not necessarily indicate that a Record is Vital, nor does a Record designated as "Vital" always remain Vital. Some examples of Vital Records include, but are not limited to:

- Accounting Records
- Building Plans or Blueprints
- Construction Specification Files / Engineering Drawings of University Buildings
- Emergency / Disaster Response Plans, including, but not limited to, orders of succession, delegations of authority, emergency staffing assignments, security codes, and relevant contact information.
- Insurance Records
- Land Deeds & Easements
- Medical Records
- Patient Accounts Receivables
- Payroll Records
- Personnel Files
- Student Academic Records, including Original Transcripts
- Student Admission Files
- Student Loan Notes
- University Leases & Contracts

Department Designees must maintain an active, up-to-date inventory list of the Vital Records identified and maintained within their respective Academic or Administrative Units. A copy of this inventory list shall be securely maintained by the Senior Administrator of the College or Division and/or the Department Head/Manager of the Academic or Administrative Unit, with a copy provided to the NSU Records Manager. Where multiple copies of Vital Records exist, the Record Copy should be identified by the Department Designee, and classified as the Vital Record.

Vital Records shall not be destroyed prior to the mandatory minimum retention periods set forth in the NSU Records Retention Schedule. Additionally, if a Vital Record is converted to an electronic format, the Original Vital Record shall not be destroyed prior to the mandatory minimum retention period set forth in the NSU Records Retention Schedule.

## **G. Records Imaging/Scanning**

Individual Academic and Administrative Units may establish standards and protocols for the scanning of Records into an Electronic Recordkeeping System. However, each Academic and Administrative Unit that substitutes Records into an Electronic Recordkeeping System must, at a minimum, adhere to the following principles:

- (1) Each Academic and Administrative Unit must always be able to substantiate that the imaged version of a Record is an exact copy of the original, paper document;
- (2) Each Academic and Administrative Unit must establish and implement a quality assurance process to verify that the imaged Record is an identical replication of the paper Record in every way;

(3) Each Academic and Administrative Unit must have written, documented procedures of the steps taken to image original Records;

(4) Each Academic and Administrative Unit must retain and designate the scanned image as the "Record Copy" for the mandatory minimum retention period as set forth in the Records Retention Schedule; and

(5) Each Academic and Administrative Unit must maintain the accessibility and ability to read the scanned Record in accordance with changes in technology.

Upon the scanning or imaging of a non-Vital Record into the Electronic Recordkeeping System, the Original, paper version of the Record may be destroyed in accordance with the procedures set forth in Section V. of this Policy, and the scanned Record may be re-classified as the Record Copy.

For more information regarding the maintenance of Electronic Records, please see Section VI. of this Policy.

For information pertaining to the scanning of Medical Records, please see Section VII. of this Policy.

## **H. On-Site Storage/Maintenance of Paper Records**

The policies and procedures regarding the maintenance of Records may differ depending on the Record's content and format. Records may exist in paper or electronic format, and may or may not contain Confidential and/or Sensitive Personal Information. Additionally, each individual Academic or Administrative Unit may have specific retention procedures corresponding to certain categories of documents. However, all such procedures must be approved in advance of their implementation by the NSU Records Manager.

### **1. Paper Records**

All Paper Records shall be maintained by their respective Office of Record until the Record is determined to be Inactive, as described in Section IV.I.1., below, or until the expiration of the mandatory minimum retention periods as set forth in the NSU Records Retention Schedule, as described further in Section V. Records maintained on-site at NSU must be clearly labeled and properly organized and maintained in a manner that enables Records to be easily located.

Records that contain any Confidential and/or Sensitive Permanent Information shall be maintained in a secure, on-site location with adequate controls in place to protect such Records from being improperly misplaced, altered, destroyed, disclosed and/or accessed by any unauthorized individual(s). If a Record consists of a combination of Confidential and/or Sensitive Permanent Information and non- Confidential and/or Sensitive Permanent Information, the Record shall be treated as a Confidential Record and maintained as such.

### **2. Electronic Records**

All Active, Electronic Records shall be maintained by their respective Office of Record until the expiration of the mandatory minimum retention periods set forth in the NSU Records Retention Schedule, as described in Section V. of this Policy. For information regarding the specific procedures for maintaining, storing, and backing up Electronic Records, please refer to Section VI., below.

## **I. Off-Site Storage/Maintenance of Records**

The policies and procedures regarding the off-site storage of Records may differ depending on the Record's content and format. Records may exist in paper or electronic format, and may or may not contain Confidential and/or Sensitive Permanent Information.



## **1. Paper Records**

Department Designees shall regularly review Records maintained within their Academic or Administrative Units to determine whether such Records are Inactive (i.e., no longer required for current operations). The Department Designees should make this determination by weighing the immediate usefulness of the Records against existing, on-site physical space limitations. If the Department Designee determines that any Records are Inactive, they may be considered for off-site storage. However, Inactive Records may only be stored in an off-site storage facility approved by the NSU Records Manager.

If the Department Designee determines that Inactive Records should be placed in an off-site storage facility, the Department Designee shall submit a work order with the NSU Records Manager. Upon review and approval of the work order, the NSU Records Manager will provide the Department Designee with approved storage box(es) and barcode labels. The Department Designee shall prepare the storage box(es) in accordance with the Box Preparation Instructions, located on the NSU Office of Business Services website, at [www.nova.edu/records](http://www.nova.edu/records). Inactive Records shall be placed in the storage box(es) in the order in which they were originally filed and maintained on-site at NSU.

The Department Designee shall also complete a Records Inventory List, which must include a date range and description of the contents of each storage box. For more information regarding how to complete and submit a Records Inventory List, please contact the Office of Business Services or email [records@nova.edu](mailto:records@nova.edu).

Box(es) that contain Protected Health Information, Confidential, Sensitive and/or Permanent Information shall be clearly labeled as such by the Department Designee. Boxes that contain such Records shall be securely and adequately maintained in the off-site storage facility in a manner that protects such Records from being improperly misplaced, altered, destroyed, disclosed and/or accessed by any unauthorized individual(s).

The off-site storage vendor will maintain a box-level inventory in a central inventory system. However, the Department Designee is responsible for creating and maintaining an inventory list containing a detailed description of the contents of each storage box. The inventory list shall be maintained in the approved, recordkeeping platform (e.g., IMConnect) for easy reference in order to enable future retrieval and accessibility. A copy of this inventory list must also be provided to and maintained by the Records Manager.

## **2. Electronic Records**

For information regarding the procedures related to inventorying and storing Electronic Records and backups of same, please refer to Section VI., below.

## **3. Retrieval of Records from Off-Site Storage Facilities**

The NSU Office of Business Services is responsible for facilitating the retrieval of paper Records from off-site storage facilities. For information regarding the Records retrieval process, please contact the Office of Business Services or email [records@nova.edu](mailto:records@nova.edu).

## **V. Destruction of Records**

All NSU Workforce members share an equal responsibility to properly retain and subsequently destroy Records in accordance with the procedures outlined in this section of the Policy.

For information regarding the destruction of Medical Records and Records containing Protected Health Information or patient-specific identifiers, please see Section VII. of this Policy, below.

## **A. Timing for Destruction**

Records may not be destroyed prior to the expiration of the mandatory minimum retention period set forth in the NSU Records Retention Schedule, attached hereto as Attachment "A."

## **B. Method of Destruction**

Records shall only be destroyed in accordance with the procedures set forth in this Policy, and shall never be disposed of in an unsecured trash or recycling receptacle.

## **C. Use of Outside Contractors for the Destruction of Records**

All Paper Records for which the mandatory minimum retention period has expired pursuant to NSU Records Retention Schedule shall be destroyed by an outside vendor. The use of outside contractors or vendors for the destruction of Records shall be pre-approved by the Office of Business Services. The Office of Business Services will be responsible for maintaining and safeguarding executed contracts with outside contractors or vendors.

## **D. Destruction of On-Site Records**

### **1. Paper Records**

If the mandatory minimum retention period for a Record stored on-site at NSU has expired in accordance with the NSU Records Retention Schedule, the Department Designee shall fill out the **NSU Records Destruction Request Form, Attachment "B" to this Policy**, providing an inventory, in sufficient detail, of the Records to be destroyed. The Form must be reviewed, approved and executed by the Senior Administrator of the Division or College and the Department Head/Manager of the Academic or Administrative Unit, and then submitted to the NSU Records Manager for final approval. Records subject to any holds, pursuant to Section V.F. of this Policy, shall not be destroyed, irrespective of the expiration of the mandatory minimum retention periods set forth in the NSU Records Retention Schedule.

If the NSU Records Manager approves the destruction of such Records, he or she shall notify the Department Designee of same, and will coordinate the destruction of the Records with NSU's Records destruction vendor. For purposes of this Policy, all Paper Records, regardless of whether they contain Confidential and/or Sensitive Permanent Information or non-Confidential and/or Sensitive Permanent Information, shall be cross-shredded by NSU's Records destruction vendor.

The NSU Records Manager is responsible for maintaining each NSU Records Destruction Request Form in an adequately secure location and in accordance with the NSU Records Retention Schedule.

Additionally, upon the destruction of a Record, regardless of its format or content, an outside contractor or vendor will issue a Certificate of Destruction to the Department Designee. Each Academic and Administrative Unit shall be responsible for maintaining each Certificate of Destruction in an adequately secure location. A copy of the Certificate of Destruction shall be provided to and maintained by the NSU Records Manager.

### **2. Electronic Records**

For information regarding the procedures related to the destruction of Electronic Records and the electronic media on which such Records are stored, please refer to Section VI., below.

## **E. Destruction of Off-Site Records**

### **1. Paper Records**

If the mandatory minimum retention period for a Record stored at an off-site storage facility has expired in accordance with the NSU Records Retention Schedule, the Department Designee shall fill out the **NSU Records Destruction Request Form, Attachment "B" to this Policy**, providing an inventory, in sufficient detail, of the Records to be destroyed. The Form must be reviewed, approved and executed by the Senior Administrator of the Division or College and the Department Head/Manager of the Academic or Administrative Unit, and then submitted to the NSU Records Manager for final approval. Records subject to any holds, pursuant to Section V.F. of this Policy, shall not be destroyed, irrespective of the expiration of the mandatory minimum retention periods set forth in the NSU Records Retention Schedule.

If the NSU Records Manager approves the destruction of such Records, he or she shall notify the Department Designee of same, and will coordinate the destruction of the Records with NSU's Records destruction vendor. For purposes of this Policy, all Paper Records, regardless of whether they contain Confidential/Sensitive/Personal or non-Confidential/Sensitive/Personal Information, shall be cross-shredded by NSU's Records destruction vendor.

The NSU Records Manager is responsible for maintaining each NSU Records Destruction Request Form in an adequately secure location and in accordance with the NSU Records Retention Schedule.

### **2. Electronic Records**

For information regarding the procedures related to the destruction of Electronic Records and the electronic media on which such Records are stored, please refer to Section VI., below.

## **F. Investigations, Audits and Legal or Administrative Proceedings**

In the event of an internal or external investigation or audit, a lawsuit, an administrative proceeding, or some other form of legal process for which particular Records may be relevant, those Records shall not be destroyed, irrespective of the Records retention periods set forth in the NSU Records Retention Schedule. In such cases, the relevant Records, whether contained on- or off-site, should not be maintained or intermingled with other Records that are subject to destruction, but rather segregated and placed under a "litigation hold" for proper handling and preservation of same. The NSU Records Manager shall verify that Records are not subject to a litigation hold prior to approving their destruction.

It is extremely important that NSU Workforce members carefully follow the instructions provided regarding the retention of Records subject to an investigation, audit, lawsuit, or other proceeding, to avoid the possibility of impeding an investigation or the defense/prosecution of legal proceedings. Any member of the NSU Workforce who becomes aware of an actual or reasonably foreseeable investigation, audit, lawsuit, administrative proceeding, or other form of legal proceeding, shall promptly notify NSU Risk Management of same.

Upon the conclusion of the investigation, audit, lawsuit, or other proceeding, normal retention and destruction procedures shall resume, absent instructions to the contrary.

If there are any questions regarding Records related to a proceeding, contact NSU Risk Management or the NSU Office of General Counsel before taking action.

## **VI. Maintenance and Destruction of Electronic Records**

The policies set forth in this Section pertain to the maintenance, storage, retention, and destruction of Electronic Records. Note that these policies are subject to revision as the NSU Office of Innovation and Information Technology ("OIIT") continues to update its policies and procedures to reflect changes in technology.

## **A. Electronic Records**

Records are defined and categorized by their content and purpose, regardless of their format. As such, Electronic Records are to be managed, retained and destroyed based on the content of the Record itself, pursuant to the corresponding retention periods set forth in the Records Retention Schedule, Attachment "A" to this Policy.

## **B. Electronic Records Ownership**

As with paper Records, Electronic Records created or received during the normal course of University business, including e-mails, are the sole and exclusive property of NSU. No member of the NSU Workforce, regardless of his or her position therein, has any personal or property right to such Records, even if he or she generated, developed or compiled them.

The maintenance, organization, storage and retention of Electronic Records shall be the responsibility of each Academic and Administrative Unit within which they are generated, received, and/or contained.

## **C. Electronic Records Inventory**

NSU OIIT maintains an active, up-to-date inventory of all OIIT-managed information systems and applications. However, each Academic and Administrative Unit shall be responsible for creating ongoing inventories as to the Electronic Records stored on such systems to enable such Records to be easily located and retrieved.

## **D. Electronic Records Integrity & Security**

Each Academic and Administrative Unit, in conjunction with OIIT, shall adequately protect Electronic Recordkeeping Systems so that Electronic Records contained therein are protected from accidental or intentional alteration and/or deletion. In order to facilitate this, OIIT-managed Electronic Recordkeeping Systems are secured behind network firewalls and intrusion prevention systems, server access is restricted at the operating-system level to authorized users, and application software requires user authentication and role-based authentication to access Records.

With respect to Electronic Recordkeeping Systems that are not yet under the management and control of OIIT, it is the responsibility of each Academic and Administrative Unit to implement proper mechanisms to prevent Electronic Records from improper and unauthorized access and/or alteration and/or deletion.

## **E. Preservation of Electronic Records**

Electronic Records, and the media on which Electronic Records are stored, can become unreadable over time due to physical, environmental, chemical, or other forms of deterioration. As such, special care and precautionary measures shall be taken to avoid the loss of Electronic Records stored on electronic media.

In order to preserve Electronic Records for future usability, OIIT copies such Records to back-up media and preserves such media in secure, off-site, environmentally controlled facilities specifically designed to provide the optimal conditions for preserving magnetic data. A formal, back-up system inventory is maintained by OIIT to catalog the name and location of every recorded data set. The electronic back-up media is labeled and indexed in the catalog for efficient location and retrieval purposes.

As technology advances and new media formats emerge, OIIT shall maintain equipment capable of reading older forms of electronic media until the Electronic Records contained thereon have reached or surpassed their mandatory minimum retention periods and/or the data is converted to a newer media format for preservation purposes.

## **F. Archiving & Organization of Electronic Records**

The maintenance and organization of Electronic Records are the responsibility of each Academic and Administrative Unit within which they are generated, received, and/or contained. Each Academic and Administrative Unit should utilize best efforts to ensure that standard conventions and a unified, consistent file naming system is put in place in order to facilitate easy and efficient retrieval. Additionally, shared, electronic storage within each Academic and Administrative Unit is strongly encouraged in order to properly organize and catalog back-up collections of individual departmental work files.

## **G. Maintenance of Electronic Back-Ups for Disaster Recovery**

Each Academic and Administrative Unit should maintain disaster recovery back-up tapes as a security precaution. It is important to note that back-up tapes and similar electronic media are not intended to serve as a Records retention tool; rather, they are only used for the restoration of lost Records. Therefore, Records that have not yet met their mandatory minimum retention periods shall not be disposed of solely on the basis of the existence of a back-up tape.

NSU OIIT currently maintains extensive back-ups for all OIIT-managed information systems. Electronic Records stored on such systems are backed up daily, with multiple copies kept and stored for a ninety (90)-day period. Monthly back-up copies of this data are kept for at least one (1) year, and longer as retention requirements may dictate. The current practice is to keep back-up data for seven (7) years.

All electronic media containing Electronic Records is stored off-site in secure, environmentally controlled facilities that are specifically designed with the optimal conditions for preserving magnetic data.

## **H. Off-Site Storage/Maintenance of Electronic Records**

Electronic Records are stored in an off-site facility managed by a third-party vendor. Media transit between NSU locations and the off-site facility is via secure courier. All requests for active or inactive electronic media is recorded and logged by OIIT so its location and custody is known at all times.

The environmental conditions for storing electronic media are the same for both short- and long-term storage. All electronic media containing Electronic Records is stored off-site in secure, environmentally controlled facilities that are specifically designed with the optimal conditions for preserving magnetic data.

## **I. Retention of Electronic Records**

Department Designees should utilize best efforts to ensure that their respective Academic or Administrative Units understand that Electronic Records are to be retained in accordance with the mandatory minimum retention periods set forth in the Records Retention Schedule.

Retention periods are determined by the nature, content, and purpose of Records, and are set based on their legal, fiscal, administrative and historical values, regardless of their format. As such, the retention of any particular Electronic Record shall be the same as the retention for Records in any other format that documents the same function or activity. In the event an attachment to an e-mail has a longer retention period than the e-mail itself, the entire Record is to be retained for the longer period.

## **J. Destruction of Electronic Records**

Electronic Records may not be destroyed prior to the expiration of the mandatory minimum retention period set forth in the NSU Records Retention Schedule, attached hereto as Attachment "A." As with paper Records, Electronic Records may not be destroyed unless and until it is determined that such Records is not subject to a litigation hold, pursuant to Section V.F. of this Policy.

Each Academic and Administrative Unit shall verify that all Electronic Records are destroyed in a manner that safeguards the interests of the University, as well as the safety, security, and privacy of individuals. Electronic Media that contains Sensitive Personal Information shall be destroyed in a manner that renders information contained on such Media is unreadable.

For assistance in the destruction of on- or off-site Electronic Records and/or electronic media containing such Records, please contact the Office of Innovation and Information Technology.

## **VII. Maintenance of Medical Records**

### **A. Medical Records**

A Medical Record shall be maintained for every individual who is evaluated and/or treated as a patient or an emergency patient at a NSU Health/Mental Health Care Center/Clinic/Institute/Department.

Currently, NSU's Medical Records are considered Hybrid Records, consisting of both electronic and paper documentation. Documentation that comprises the Medical Record may physically exist in separate and multiple locations in both paper-based and electronic formats. The contents of a Medical Record may be maintained in either paper (hardcopy) or electronic formats, including digital images, and can include patient-identifiable source information, such as photographs, films, digital images, and/or written or dictated summaries or interpretations of findings.

NSU Medical Records and Billing Records shall be maintained in locations with adequate security and/or environmental protections and in accordance with the mandatory minimum retention periods as set forth in this Policy and the NSU Records Retention Schedule.

### **B. Medical Records Ownership**

NSU is the designated Records owner of all NSU Health/Mental Health Care Centers/Clinics/Institutes/Departments patient Medical Records.

Original Medical Records may not be removed from NSU Health/Mental Health Care Center/Clinic/Institute/Department offices, except for University reviews and/or auditing (e.g., compliance reviews/auditing, risk management reviews, legal reviews), or by court order, subpoena, or as otherwise required by law.

If a NSU-employed healthcare provider separates from or is terminated by the University for any reason, he or she may not remove any Original Medical Record(s) and/or billing information from any NSU Health/Mental Health Care Center/Clinic/Institute/Department.

### **C. On-Site Storage of Medical Records & Billing Records**

Electronic and Paper Medical Records, Billing Records and/or Records that contain any Protected Health Information, Confidential, Sensitive and/or Permanent Information shall be maintained in a secure, on-site location with adequate controls in place to prevent such Records from being improperly misplaced, altered, destroyed, disclosed and/or accessed by any unauthorized individual(s).

### **D. Off-Site Storage of Paper Medical Records & Billing Records**

Paper Medical and Billing Records shall be maintained and organized in a way that facilitates adherence to this Policy. The Department Designee(s) responsible for the management of Medical and Billing Records maintained by applicable NSU Centers/Clinics/Institutes/Departments will determine when Paper Medical and Billing Records have become Inactive and should be transferred to an off-site storage facility that is approved by the NSU Records Manager. Department Designee(s) will verify that an accurate and complete inventory exists in order to enable individuals to locate and retrieve such Records from off-site storage facilities, pursuant to Section VII.D.3. of this Policy.

### **1. Use of Outside Vendors for Off-Site Storage of Paper Medical and Billing Records**

Off-site storage vendors will be pre-approved by the NSU Records Manager. Off-site storage facilities must be secure locations with the capability to reasonably safeguard Paper Medical and Billing Records against the unauthorized access, use, disclosure, or disposition (by any cause).

### **2. Business Associate Agreement**

A written and signed Business Associate Agreement approved by legal counsel is required for the engagement of any outside entities to assist in the off-site storage of any Paper Records that include Medical Records, Billing Records, and Records containing information about patients/clients.

The NSU Records Manager is responsible for maintaining and safeguarding executed copies of Business Associate Agreements in accordance with the NSU Records Retention & Disposition Schedule.

For further guidance pertaining to Business Associate Agreements, please refer to NSU HIPAA Policies and any amendments thereto.

### **3. Inventory Form & Storage Boxes**

The designated individual(s) responsible for the management of Medical Records maintained by applicable NSU Centers/Clinics/Institutes/Departments, must complete the **NSU Medical and Billing Records Inventory List, Attachment "C" to this Policy**, detailing the contents of each storage box. The inventory form must be maintained in the approved recordkeeping platform (e.g., IMConnect) for easy reference. A copy of the inventory form generated by the individual(s) responsible for safeguarding Paper Medical Records and Billing Records shall be maintained by each NSU Health/Mental Health Care Center/Clinic/Institute/Department.

Inventories of all Paper Medical Records shall include, for each Record:

- The name of the applicable NSU Health/Mental Health Care Center/Clinic/Institute/Department.
- Patient's Name.
- Patient's Date of Birth.
- Patient's NSU Medical Record Number.
- Dates of Service included in the Medical Record.
- Storage Box Number.

Inventories of all Paper Medical Business Office/Billing Records shall include:

- The name of the applicable NSU Health/Mental Health Care Center/Clinic/Institute/Department.
- Detailed Description of the Contents of each Box and Folder(s), including:
  - Encounter Form Dates of Service;
  - Explanation of Benefits;
  - Payer Information; and
  - Payment/Transaction Dates.
- Storage Box Number.

Further, box(es) that contain Medical/Billing Records and/or Records that contain Protected Health Information shall be clearly labeled as such by the designated individual(s) responsible for the management of Medical Records. Boxes that contain such Records shall be securely and adequately maintained in the off-site storage facility in a manner that prevents such Records from being improperly misplaced, altered, destroyed, disclosed and/or accessed by any unauthorized individual(s).

## **E. Medical Records Substitution/Scanning**

NSU Health/Mental Health Care Centers/Clinics/Institutes/Departments may establish standards and protocols for the scanning of Medical and Billing Records into an Electronic Medical Record System. However, each NSU Health/Mental Health Care Center/Clinic/Institute/Department that substitutes Medical and/or Billing Records into an Electronic Medical Record System must, at a minimum, adhere to the following principles:

- (1) Each NSU Health/Mental Health Care Center/Clinic/Institute/Department must always be able to substantiate that the imaged version of a Medical and/or Billing Record is an exact copy of the original, paper Medical and/or Billing Record;
- (2) Each NSU Health/Mental Health Care Center/Clinic/Institute/Department must establish and implement a quality assurance process to verify that the imaged Medical and/or Billing Record is an identical replication of the paper Record in every way;
- (3) Each NSU Health/Mental Health Care Center/Clinic/Institute/Department must have written, documented procedures of the steps taken to image original Medical and/or Billing Records;
- (4) Each NSU Health/Mental Health Care Center/Clinic/Institute/Department must retain the scanned image as the "Record Copy" for the mandatory minimum retention period as set forth in the Records Retention Schedule; and
- (5) Each NSU Health/Mental Health Care Center/Clinic/Institute/Department must maintain the accessibility and ability to read the scanned Medical and/or Billing Record in accordance with changes in technology.

Original Medical Records and Billing Records shall not be destroyed after being converted into a substitute image (e.g., scanning to a PDF document) and entering them into an Electronic Medical Record System. Rather, such Records shall be maintained in a hard copy patient chart and retained in accordance with the mandatory minimum retention period as set forth in this Policy and reflected in the NSU Records Retention Schedule, Attachment "A" to this Policy, and applicable University Policies (e.g., HIPAA).

## **VIII. Medical Records & Billing Records Retention & Destruction**

All NSU Health/Mental Health Care Centers/Clinics/Institutes/Departments shall retain, and properly destroy, Medical Records and Billing Records pursuant to the procedures set forth below.

### **A. Medical Records & Billing Records Retention Period**

Medical Records shall be maintained in accordance with applicable State and Federal laws and regulations, accreditation standards, and other requirements governing Record retention. Medical Records shall not be disposed of prior to the expiration of the appropriate retention period, in accordance with the mandatory minimum retention periods set forth in this Policy and the NSU Records Retention Schedule.

In Florida, the length of time a healthcare provider should retain his or her patient's/client's Medical Record varies, depending on the type of Medical Records, the reason for their disposition, and their potential use. As a result, all Medical Records and Billing Records, including claims information, shall be maintained for at least twelve (12) years after a patient's/client's last visit or treatment. With respect to Medical and Billing Records for Minors, which are defined as patients 17 years of age and younger, such Records shall be retained for at least twelve (12) years after he Minor reaches 18 years old.

However, Medical Records shall be maintained for each employee with occupational Bloodborne Pathogen exposure for at least the duration of employment plus thirty (30) years.



## **B. Destruction of Medical and Billing Records**

Short-term and long-term storage facilities must meet appropriate environmental standards to minimize the potential damage to Records from water, fire, theft, natural disasters, serious man-made accidents and/or other potential threats. The storage facilities must provide proper storage with temperature and humidity controls to maintain the viability of the different storage media for the duration of the retention period.

If a Medical Record stored at an off-site storage facility has expired in accordance with this Policy and the NSU Records Retention Schedule, the Department Designee shall fill out the **NSU Records Destruction Request Form**, Attachment "B" to this Policy, and attach a completed copy of the **NSU Medical and Billing Records Inventory List**, Attachment "C" to this Policy, to same. The Records Destruction Form must be reviewed, approved and executed by the Senior Administrator of the applicable NSU Health/Mental Health Care Clinic/Center/Institute/Department, and then submitted to the NSU Records Manager for final approval. Records subject to any holds, pursuant to Section VIII.D. of this Policy, below, shall not be destroyed, irrespective of the expiration of the mandatory minimum retention period set forth in the NSU Records Retention Schedule.

If the NSU Records Manager approves the destruction of such Medical Records, he or she shall notify the Department Designee of same, and will coordinate the destruction of the Records with NSU's Records destruction vendor. For purposes of this Policy, all paper Medical and Billing Records, including claims information, shall be either cross-shredded, pulped, or incinerated, so as to make whatever information present on the sheet unusable and unreadable by any individual, including, but not limited to, NSU's Records destruction vendor.

The Records Manager is responsible for maintaining each NSU Records Destruction Request Form, and the attached Inventory of Health Information Form, in an adequately secure location and in accordance with the NSU Records Retention Schedule.

## **C. Destruction of Electronic Medical Records**

Electronic Medical Records shall be maintained in their original form and in accordance with the NSU Records Retention Schedule. Policies regarding the destruction of Electronic Medical Records are currently being developed and reviewed. Guidance on the destruction of Electronic Medical Records shall be provided upon completion of same.

## **D. Investigations, Audits, & Legal & Administrative Proceedings**

In the event of an internal or external investigation or audit; an administrative or legal proceeding; or some other form of legal process for which particular Medical and Billing Records, including claims information, may be relevant, those Records shall not be destroyed, irrespective of the time frames outlined in the NSU Records Retention Schedule. The Medical and Billing Records should not be maintained or intermingled with other Records that are subject to destruction, but instead segregated and placed under a "litigation hold" for proper handling and preservation of same. The NSU Records Manager shall verify that Medical and Billing Records are not subject to a litigation hold prior to approving their destruction.

It is extremely important that NSU Workforce members carefully follow the instructions provided regarding the retention of Medical and Billing Records, including claims information, subject to an investigation, audit, lawsuit, or other proceeding, to avoid the possibility of impeding an investigation or the defense/prosecution of legal proceedings. Any member of the NSU Workforce who becomes aware of an actual or reasonably foreseeable investigation, audit, lawsuit, administrative proceeding, or other form of legal proceeding, shall promptly notify NSU Risk Management of same.

Upon the conclusion of the investigation, audit, lawsuit, or other proceeding, normal retention and destruction procedures shall resume, absent instructions to the contrary.

If there are any questions regarding Medical or Billing Records related to a proceeding, contact NSU Risk Management or the NSU Office of General Counsel before taking action.

## **E. Sanctions**

Adherence with this Policy is monitored by the designated individual(s) who are responsible for the management of Medical Records and Billing Records maintained by the applicable NSU Health Care/Mental Health Care Centers/Clinics/Institutes/Departments. Violations of this Policy will be reported to the appropriate supervising authority for potential disciplinary action, up to and including dismissal, in accordance with the Office of Human Resources Employee Policies.

## **IX. Policy Implementation & Monitoring**

### **A. Roles & Responsibilities**

NSU Academic and Administrative Units and all NSU Workforce members are responsible for maintaining, storing, retaining and disposing of Records in accordance with the procedures outlined in this Policy and in conjunction with the NSU Records Retention Schedule. In furtherance of this ongoing responsibility, each Academic and Administrative Unit will designate a Department Designee to assist in the Records Management process and to serve as the primary liaison to the NSU Records Manager. The specific responsibilities of the NSU Records Manager and Department Designees are described, in turn, below.

#### **1. NSU Records Manager**

The Vice President for Business Services will designate an individual under his/her management and supervision to serve as the NSU Records Manager. The NSU Records Manager will be responsible for the administration of the NSU Records Management & Destruction Policy, including, but not limited to:

- Serving as a liaison to Department Designees for the proper maintenance, storage, retention and destruction of NSU Records;
- Serving as the contract manager with approved, third party, off-site storage facilities and document shredding services;
- Verifying that Business Associate Agreements have been executed with outside contractors who destroy Paper Records containing Protected Health Information, and maintaining a copy of the executed Agreement;
- Arranging for and approving the destruction of Records in accordance with the NSU Records Retention Schedule;
- Ensuring that Records are not subject to a litigation hold (i.e., ensuring that they are not relevant to any internal or external investigation or audit and/or any administrative and/or legal proceeding) prior to approving the destruction of such Records; and
- Providing Records management training, education and ongoing assistance to the NSU Workforce, including Department Designees.

## **2. Department Designees**

The Senior Administrator of each Academic and Administrative Unit will designate a Department Designee, who will serve as the primary liaison to the NSU Records Manager. The Department Designees will be responsible for the administration of the NSU Records Retention Policy at the Unit level, including, but not limited to:

Serving as a liaison to the NSU Records Manager;

- Ensuring that Confidential/Sensitive Records, Records containing Personal Information and/or Records containing Protected Health Information are protected from inadvertent disclosure and/or access by unauthorized individual(s);
- Monitoring retention dates for departmental Records and regularly destroying eligible Records as set forth in the NSU Records Retention Schedule with the support and approval of the NSU Records Manager;
- Ensuring that Records are not destroyed prior to the expiration of the mandatory minimum retention periods set forth in the NSU Records Retention Schedule;
- Creating and maintaining inventory lists for Permanent Records, Vital Records and Records placed in off-site storage facilities;
- Facilitating the off-site storage of Inactive Records; and
- Periodically reviewing applicable retention schedules to determine if any updates, corrections, or additions may be necessary.

However, irrespective of the roles and responsibilities of the Department Designees, Senior Administrators will remain ultimately responsible for the maintenance and destruction of Records, as well as for the supervision of Department Designees.

## **B. Questions & Comments**

Questions or concerns regarding the retention and/or destruction procedures outlined in this Policy or regarding the retention time periods set forth in the NSU Records Retention Schedule should be directed to the NSU Records Manager. NSU Workforce members may also seek assistance from the NSU Office of General Counsel, or may e-mail questions or concerns to [records@nova.edu](mailto:records@nova.edu). For anonymous inquiries, NSU Workforce members may contact NSU's Compliance Hotline at (888) 609-NOVA.

An NSU Workforce member may propose a change, addition, or revision to the NSU Records Retention Schedule at any time. Proposals should be based on the legal, fiscal, administrative and historical value of the relevant Records. Such proposals are subject to the review and approval of the NSU Records Manager and legal counsel. Proposals may be submitted through any of the mechanisms described above.

## **C. Reporting Requirement**

NSU Workforce members are obligated to report any information regarding any individual's unauthorized disposition, falsification, alteration, removal, use, or disclosure of any Records. Such reports may be made through any of the mechanisms described in Section IX.B. of this Policy.

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Last Amended Date: June 30, 2014

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**Policy Approved By:**

Jacqueline Travisano  
Executive Vice President & Chief Operating Officer

Marc Crocquet  
Vice President, Business Services

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Date: \_\_\_\_\_

Date: \_\_\_\_\_

# **Nova Southeastern University Records Retention Schedule**

## **NSU Records Management and Destruction Policy**

### **(Attachment A)**

The NSU Records Retention Schedule is primarily based on Federal and State laws and regulations, accreditation standards, and University policies. In cases where a conflict exists between Federal, State, or other requirements, NSU generally will adopt and comply with the more stringent of the conflicting standards.

If you have any questions regarding a specific category of Record that does not appear on this Schedule, please contact the NSU Records Manager. The absence of a particular type of Record from this Schedule should not necessarily be interpreted to indicate that no retention requirements would apply.



# Nova Southeastern University

## Records Retention Schedule

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## **NSU RECORDS RETENTION SCHEDULE**

<b>RECORD CATEGORY</b>	<b>RETENTION PERIOD</b>	<b>REFERENCE (Where Applicable)</b>	<b>OFFICE OF RECORD</b>	<b>CODE</b>
<b>A. <u>ADVANCEMENT AND COMMUNITY RELATIONS</u></b>				
<b>Alumni Records:</b> Includes name change and address change records; biographical updates; record of death; return mail.	Permanent.	University Policy	Advancement & Community Relations	ADV-1
<b>Fundraising Plans:</b> Includes campaign database and reports.	Active + 3 years.	University Policy	Advancement & Community Relations	ADV-2
<b>Gift Agreements:</b> Includes donor and agreements.	Permanent.	University Policy	Advancement & Community Relations	ADV-3
<b>Gift Records:</b> Includes relevant correspondence, fund receipt and disbursement records. Gift agreements are retained separately.	Permanent.	University Policy	Advancement & Community Relations	ADV-4
<b>Special Event Files (University/Center Hosted):</b> Files maintained on special events hosted by the University or individual academic centers, such as dinners, convocations, and receptions. Files may include invitation lists, invitations, guest attendance lists, menus, programs, etc.	Retain until obsolete, superseded or administrative value is lost; then transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	ADM-SP-18
<b>B. <u>AFFIRMATIVE ACTION</u></b>				
<b>Affirmative Action Program Files:</b> Procedures and regulations to be followed, work force analysis, goals, timetable, statistics.	AAPs must be updated annually; documentation of good faith efforts must be retained for two (2) years.	Executive Order 11246, as amended by Executive Order 11375 41 C.F.R. § 60-1.12	Office of Human Resources	OHR-1
<b>Annual Reports: Federally Funded Programs:</b> Includes Integrated Postsecondary Education Data System ("IPEDS") reports; Office for Civil Rights ("OCR") reports; and Equal Employment Opportunity Commission ("EEOC") reports.	3 years after termination of federal funds.	29 C.F.R. § 1602.48	Relevant Administrative Center	ADM-SP-1
<b>Complaint Files (Internal):</b> Case files of staff, faculty, or student internal grievances based on equal opportunity and affirmative action regulations.	5 years after final disposition.	FLA. STAT. § 95.11	Office of Human Resources	OHR-2
<b>Complaint Files (Department of Education):</b> Case files of student grievances to the Department of Education.	5 years after final disposition.	FLA. STAT. § 95.11	Relevant Academic Center	ADM-SP-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>EEO-6/IPEDS:</b> Integrated Postsecondary Education Data System and all Records used to complete IPEDS (formerly EEO-6) and all related information.	3 years after most recently filed request.  Must be kept at Central Administration Office, at Central Office of Separate Campus or Branch, or at individual school that is subject to the report, wherever most convenient.	29 C.F.R. § 1602.48	Relevant Administrative Center	ADM-SP-3
<b>C. <u>ATHLETICS</u></b>  The NSU Department of Athletics competes in Division II of the National Collegiate Athletic Association ("NCAA") as members of the Sunshine State Conference. Continued familiarity with Conference and NCAA requirements, and any changes thereto, falls within the purview of the Athletic Department Compliance Director.				
<b>C1. <u>ADMINISTRATIVE RECORDS (ATHLETIC DEPARTMENT-SPECIFIC)</u></b>				
<b>Athletic Alumni Questionnaires</b>	Retain until obsolete, superseded or administrative value is lost.	University Policy	Athletic Department	ATH-1
<b>Athletic Camp(s) and Clinic(s) Compensation Records (Coaches and Student-Athletes):</b> Documents should reflect both amount and source per NCAA regulations.	7 years or until applicable audits have been released, whichever is greater.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Communication and External Operations	ATH-2
<b>Athletic Facility Rental Records:</b> Includes Facility Use Agreements and Certificates of Insurance.	1 year for short-term (1 day – 1 week) use agreements; 5 years for extended use agreements.  Certificates of Insurance to be provided to Risk Management.	FLA. STAT. § 95.11(2)	Athletic Communication and External Operations/ Office of Legal Services	ATH-3 LEG-1
<b>Meal Money Sign Forms:</b> Records reflecting per diem meal allotment for student-athletes.	7 years or until applicable audits have been released, whichever is greater.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Business Office	ATH-4
<b>NCAA Rules Review and Drug Meeting Files:</b> Provides a record of student attendance at yearly NCAA rules review and drug seminars, includes signed statements of those who have attended the seminars and lists of those who have not.	7 years or until applicable audits have been released, whichever is greater.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>NSU Game Contracts</b>	End of Academic Year or upon expiration, whichever is greater.	University Policy	Athletic Compliance Department	ATH-6
<b>Self-Study Reports and Evaluations:</b> Includes supervisor evaluations and all evaluations required by NCAA.	Permanent.	NCAA Division II Bylaws University Policy	Athletic Department	ATH-7
<b>Squad Lists:</b> Roster from each coaching staff member.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Athletic Compliance Department	ATH-8 ARCH-2
<b>Sports Media and Press Documentation:</b> Includes news releases; media guides; newsletters; photo files; statistical updates to SSC & NCAA; media press credentialing and documentation; student photo/image releases.	Transfer to University Archives for permanent retention.	University Policy	Athletic Communication and External Operations	ATH-9 ARCH-3
<b>Team Schedules:</b> Practice and Game/Match schedule Records.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Athletic Communication and External Operations	ATH-10 ARCH-1
<b>Team Travel Forms:</b> Includes itinerary, reimbursement forms, bus or van requests, rentals and other related documentation.	End of Academic Year.	University Policy	Athletic Compliance Department	ATH-11
<b>C2. STUDENT-ATHLETE ACADEMIC- AND MEDICAL-RELATED RECORDS</b>				
<b>ACT/SAT Document with Official Visit Form</b>	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-12
<b>Application Letters for Post-Eligibility Degree Awards (Fifth-Year Aid)</b>	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-13
<b>Medical-Related Records (Student-Athletes):</b> Includes medical history and initial orthopedic history questionnaires; ADHD letters; treatment records; medical excuses; medical referrals; medical clearance; waiver records; Insurance Release and Assumption of Risk Form; NSU Insurance Process Consent Form; NSU Authorization/Consent for Disclosure of Health Information Form.	12 years from date of last encounter.	FLA. STAT. § 95.11 FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Athletic Training Room and Athletic Director	ATH-14
<b>Student Athlete Advisory Committee (SAAC) Records</b>	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Student Athlete Advisory Committee	ATH-15

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Summer Financial Aid Request Forms</b>	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-16
<b>C3. <u>ATHLETIC COMPLIANCE RECORDS</u></b>  The following listing of Records to be retained for Conference and/or NCAA compliance purposes is not all inclusive. Some documentation may be set forth in one of the other Athletic Record Schedules. Continued familiarity with Conference and NCAA requirements, and any changes thereto, falls within the purview of the Athletic Department Compliance Director.				
<b>Athletic Scholarship Records:</b> Includes award letter, non-renewal, cancellation letters, and any other pertinent documentation.	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-17
<b>Certificates of Compliance:</b> Includes coaches and athletic trainer certification documentation.	7 years from date of termination of employment or until conclusion of any legal proceeding, if later.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-18
<b>Eligibility Records:</b> Includes, but is not limited to: Compliance Assistance Internet (CA) Eligibility Checklist; Eligibility Center Web Status Report; mid-season eligibility verification form; and statement concerning eligibility for NCAA compliance. Also includes the following Records, per student-athlete: Squad List Information Form; NSU Student-Athlete Agreement Form; Drug Screening Consent Form; NSU Department of Athletics Student-Athlete Agreement Concerning Hazing Form; Release of Practice Travel Liability Agreement.	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-19
<b>Hardship Eligibility Waivers (SSC Requirement)</b>	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-20
<b>Level II/Secondary Violations/Waiver Records/ Investigation Notes (NCAA Requirement)</b>	Permanent.	NCAA Division II Bylaws University Policy	Athletic Compliance Department	ATH-21
<b>Major Infractions Case/Investigation Notes/ NCAA Reports</b>	Permanent.	NCAA Division II Bylaws University Policy	Athletic Compliance Department	ATH-22
<b>National Letters of Intent (NLIs):</b> Includes NLI Request Forms and cover letters.	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-23

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Play/Practice Log Sheets</b>	Current + 4 years.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-24
<b>Player Pass List</b>	Current.	University Policy	Athletic Compliance Department	ATH-25
<b>Positive Drug Test Records:</b> Includes initial notification letter and reinstatement letter, if any.	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-26
<b>Recruiting Records:</b> Includes telephone and mail logs; contact and evaluation logs; official-visit records (five-visit notification, test scores, student-host forms, complimentary admissions); unofficial-visit records; recruiting files of prospects; documentation of coaches' travel and entertainment and expenses during recruitment.	One (1) year if recruited individual does not become an NSU Student-Athlete.  If individual becomes an accepted and registered Student-Athlete at NSU then 7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-27
<b>Shark Club (Booster) Records:</b> Includes applications and transmittal forms; accounting and financial reports.	7 years or until audit is complete, whichever is greater.	University Policy	Athletics	ATH-28
<b>Student-Athlete File (Departmental):</b> Includes recruiting records; National Letter of Intent; Student-Athlete required statements (Parts I-V) (Statement Concerning Eligibility; Buckley Amendment Consent; Promotion of NCAA Championships, Events, Activities or Programs; Drug Testing Consent; for incoming Freshman regarding valid ACT and SAT Scores); positive drug test letter; positive drug test reinstatement letter; roster removal forms; transfer information request.	7 years after graduation, transfer, withdrawal or date of last attendance.	NCAA Division II, Bylaw 32.6.3 University Policy	Athletic Compliance Department	ATH-29
<b>Sunshine State Conference Compliance Records:</b> Includes Sunshine State Conference Eligibility Forms; Competition Participation Forms; Declaration of Playing Season Form.	7 years or until applicable audits have been released, whichever is greater.	NCAA Division II, Bylaw 32.6.3 Sunshine State Conference Handbook University Policy	Athletic Compliance Department	ATH-30

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>D. BUILDINGS, EQUIPMENT, PROPERTY, &amp; OTHER FIXED ASSETS</b>				
<b>Appraisals – Property:</b> Property is defined for purposes of this category as land and buildings.	5 years, then transfer to Risk Management for permanent retention.	FLA. STAT. § 475.629	Relevant Executive Office	ADM-GEN-1
<b>Architectural Plans/Specifications – Preliminary Drawings:</b> Consists of those graphic and engineering preliminary drawing Records that depict conceptual, as well as precise, measured information essential for the planning and construction of facilities.	Retain until completion and acceptance.	University Policy	Facilities Management	FMGT-1
<b>Building and Grounds Infrastructure and Remodeling Records</b>	Active + 15 years.	FLA. STAT. § 95.11(3)(c)	Facilities Management	FMGT-2
<b>Building Plans and Specifications:</b> Includes architectural and engineering drawings, profiles and blueprints.	Transfer to University Archives for permanent retention.	University Policy	Facilities Management	FMGT-3 ARCH-5
<b>Capital Construction Project Records:</b> Includes design and schematic development; construction design and specifications; permitting, construction documents and other related project records.	15 years after completion of project.	FLA. STAT. § 95.11(3)(c)	Facilities Management	FMGT-4
<b>Depreciation Schedules</b>	Permanent.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Fixed Assets	FIN-1
<b>Disposal of Fixed Assets Records</b>	7 years for all capital furniture, fixtures and equipment, provided all applicable audits have been released.  Permanent for Buildings.	NSU Accounting & Financial Policies & Procedures	Fixed Assets	FIN-2
<b>Equipment Manuals</b>	Life of Asset.	University Policy	Facilities Management	FMGT-5
<b>Fixed Asset Inventory Forms:</b> Includes supporting documentation related to the transactions included in the periodic inventory, additions, deletions, and adjustments.	7 years for all capital furniture, fixtures and equipment provided all applicable audits have been released.	NSU Accounting & Financial Policies & Procedures	Fixed Assets	FIN-3
<b>Fixed Asset Inventory Listings:</b> Includes periodic inventory of fixed asset items (capital furniture, fixtures and equipment).	7 years for all capital furniture, fixtures and equipment provided all applicable audits have been released.	NSU Accounting & Financial Policies & Procedures	Fixed Assets	FIN-4

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Land Surveys</b>	Permanent.	University Policy	Facilities Management	FMGT-6
<b>Medical and Scientific Equipment Records:</b> Includes calibration and calibration checks; equipment maintenance and function checks; control procedures and remedial actions if taken.	2 years.	University Policy	Environmental Health Services	EHS-1
<b>Property Acquisition and Disposition Records:</b> Includes deeds, mortgages, inventory, bills of sales, and any relevant correspondence. Property is defined for purposes of this category as land and buildings.	Permanent.	University Policy	Facilities Management	FMGT-7
<b>UC Club Box Rental Forms</b>	Current + 5 years.	FLA. STAT. § 95.11(2)	University Center Arena	BSVS-2
<b>Vehicle Maintenance Records:</b> Includes maintenance agreements, inspection records, emission records, fuel records and mileage, oil change forms, warranty work on University-owned or leased vehicles.	Active + 4 years.	FLA. STAT. § 95.11(3)	Facilities Management	FMGT-7
<b>Vehicle Records:</b> Includes copy of registration and titles, confidential tag issuance information, other information relating to title to University-owned or leased vehicles. Does not include maintenance or inspection records.	One (1) year after disposition of vehicle, provided applicable audits have been released.	Chapter 319, Florida Statutes Chapter 320, Florida Statutes	Risk Management	RSK-1
<b>Work Orders</b>	4 years after completion.	FLA. STAT. § 95.11(3)	Facilities Management	FMGT-8
<b>E. <u>CAMPUS SECURITY &amp; SAFETY</u></b>				
<b>Clery Annual Security Reports:</b> Reports produced in compliance with federal programs.	Active + 4 years.	20 U.S.C. § 1092(f)	Public Safety	PSFT-1
<b>Clery Log:</b> Includes non-Clery incidents.	Active + 4 years.	20 U.S.C. § 1092(f)	Public Safety	PSFT-2
<b>Disaster Preparedness Drills:</b> The results of disaster preparedness exercises and the supporting documents including scenarios, location of safety related drills, time tables, response times, probable outcomes, areas of difficulties, descriptions of how difficulties were resolved, and areas for improvement. Types of drills include, but are not limited to: Fire, tornado, safety, hurricane and Superfund Amendments & Reauthorization Act ("SARA") chemical spills.	4 calendar years, provided reviews have been conducted.	Florida General Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-4
<b>Disaster Procedure Plans:</b> This record series consists of emergency and disaster preparedness and/or recovery plans.	4 anniversary years or until obsolete, superseded or administrative value is lost.	Florida General Records Schedule GS1-SL University Policy	Relevant Executive Office	ADM-GEN--2

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*Record Retention Schedule*

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Dispatch Logs:</b> Digital record of phone and radio transmissions from the campus security dispatcher.	Current + four (4) years.	FLA. STAT. § 95.11(3)	Public Safety	PSFT-3
<b>Driver Training Records</b>	Active + 4 years.	FLA. STAT. § 95.11(3)	Public Safety	PSFT-4
<b>Elevator Certifications</b>	Current until superseded.	FLA. STAT. § 95.11(3)	Facilities Management	FMGT-9
<b>Emergency Mass Notifications (Clery and Non-Clery Related)</b>	Active + 4 years.	20 U.S.C. § 1092(f) Florida General Records Schedule GS1-SL University Policy	Public Safety	PSFT-5
<b>Emergency Notification System Testing Records</b>	4 calendar years provided reviews have been conducted.	FLA. STAT. § 95.11(3) Florida General Records Schedule GS1-SL University Policy	Public Safety	PSFT-6
<b>Fire Orders:</b> Issued by Fire Marshal to correct fire code deficiencies. Record set includes fire inspection records.	4 years provided deficiency has been corrected.	FLA. STAT. § 95.11(3)	Physical Plant	FMGT-10
<b>Found and Unclaimed Tangible Property:</b> Includes misplaced, lost or abandoned personal property.	90 days.	University Policy	Public Safety	PSFT-7
<b>Identification Card Records (Shark ID):</b> Includes log of identification badges for NSU facilities issued, distributed and collected. Includes requests and agreements with vendors.	Retain as long as student is enrolled, employee is employed, or vendor is under contract.	University Policy	Business Services	BSVS-1
<b>Incident Reports:</b> Reports created by University Security for incidents that occur on campus. These records include, but are not limited to, lost and stolen property reports; property damage. These Records do not document medical attention rendered by staff or volunteers.	4 calendar years provided applicable audits have been released.	FLA. STAT. § 95.11(3) Florida General Records Schedule GS1-SL University Policy	Public Safety	PSFT-8
<b>Inspection Records (Fire, Security and Safety):</b> Reports for fire, security, and safety inspections of physical plant and property.	4 years after inspection provided applicable audits have been released.	FLA. STAT. § 95.11(3) Florida General Records Schedule GS1-SL University Policy	Facilities Management	FMGT-11
<b>Inspection Records (Medical/Scientific):</b> Safety inspections to assess conditions and practices in the workplace. Reports may include identification and recommended corrective action to address identified unsafe equipment, conditions, processes, and work practices in medical and scientific facilities, including laboratories.	30 years.	29 C.F.R. § 1910.1020	Environmental Health Services	EHS-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Inspection Records (Food Safety and Sanitation):</b> Reports for food safety and sanitation inspections, including inspection for compliance with sanitation standards and food handling, processing, and storage.	4 years after inspection provided applicable audits have been released.	FLA. STAT. § 95.11(3) Florida General Records Schedule GS1-SL University Policy	Facilities Management or Designee	FMGT-12
<b>Key Issuance Records:</b> Log of keys for NSU facilities issued, distributed and collected. Includes requests and agreements with vendors.	Retain as long as employee is employed or vendor is under contract.	University Policy	Public Safety	PSFT-9
<b>Material Safety Data Sheets</b>	30 years.	29 C.F.R. § 1910.1020	Environmental Health Services	EHS-3
<b>Parking Decal/Permit Records</b>	2 fiscal years, provided applicable audits have been released.	University Policy	One-Stop Shop	ESS-1
<b>Parking Records:</b> Includes appeal and citation records. Does not include collection effort records or parking decal records.	180 days after citation issued or after completion of appeals process, whichever is longer.  Any unpaid citations are to be forwarded to designated office handling collection efforts.	Florida General Records Schedule GS5 University Policy	Public Safety	PSFT-10
<b>Public Safety Coordinator Log</b>	Active + 4 years.	FLA. STAT. § 95.11(3) University Policy	Public Safety	PSFT-11
<b>Public Safety Officer's Log</b>	Active + 4 years.	FLA. STAT. § 95.11(3) University Policy	Public Safety	PSFT-12
<b>Safety Committee Reports</b>	4 years after report date provided applicable audits have been released.	FLA. STAT. § 95.11(3) University Policy	Risk Management	RSK-2
<b>Safety Training Documentation:</b> Records document employee training and certification such as for equipment operation, hazardous material handling and emergency procedures, driver 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; acknowledgment of safety rules; instruction sheets; copies of hazardous material data sheets; informational materials; and related documentation and correspondence.	30 years after employee separation.	15 U.S.C. § 2607(c) 29 U.S.C. § 657 29 C.F.R. § 1910.1020	Environmental Health Services	EHS-4
<b>Safety-to-Life Inspection Records:</b> Consists of reports and correspondence related to safety-to-life inspections of college facilities conducted in accordance with Florida law.	Active + 5 years.	Fla. Admin. Code r. 69A-60 Chapter 633, Florida Statutes	Facilities Management	FMGT-13

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*Record Retention Schedule*

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Security Access Records</b>	Permanent.	University Policy	Public Safety	PSFT-13
<b>Tow Records:</b> Vehicle removal from property.	4 years after report date provided applicable audits have been released.	FLA. STAT. § 95.11(3)	Public Safety	PSFT-14
<b>Workplace Chemical Lists</b>	Current + 30 years.	15 U.S.C. § 2607(c) 29 U.S.C. § 657 29 C.F.R. § 1910.1020	Environmental Health Services	EHS-5
<b>F. <u>ELECTRONIC COMMUNICATIONS/RECORDS</u></b>  There is no single retention period that applies to all electronic messages or communications, whether they are sent by e-mail, instant messaging, text messaging, multimedia messaging, chat messaging, social networking, or any other current or future electronic messaging technology or devise. <b><u>Rather, retention periods for Electronic Records are determined by the content, nature, and purpose of records and are set based on their legal, fiscal, administrative, and historical values, regardless of the format in which they reside or the method by which they are transmitted.</u></b> The retention can have a variety of purposes and relate to a variety of program functions and activities. The retention of any particular electronic message will generally be the same as the retention for records in any other format that document the same program function or activity. Electronic communications that are created primarily to communicate information of short-term value, such as messages reminding employees about scheduled meetings or appointments, may fall under the "Transitory Messages" series.				ADM-GEN-3
<b>G. <u>GENERAL OFFICE ADMINISTRATION RECORDS</u></b>				
<b>Abuse/Neglect Reporting Records:</b> Consists of any written Record reporting known or suspected abuse, neglect or abandonment of a child, including, but not limited to, DC&F reporting forms.	Permanent.  For DC&F reporting, DC&F maintains Record Copy. A copy of the Record shall be maintained with the relevant reporting center.	Florida General Records Schedule GS7 University Policy	Relevant Administrative or Academic Unit	ADM-GEN-4
<b>Administrative Convenience Records:</b> Files maintained for subjects of relevance to the work of an office which is located away from the official administrative or academic file(s). Such files can include information-only copies or extracts of documents, including duplicates retained for reference purposes. The materials filed in this series are NOT the Official Record or the Record Copy, but are maintained for the convenience in carrying out duties.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-5

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Calendars:</b> Official electronic or hand-written calendar of daily appointments and meetings.	Current + 5 years.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-6
<b>Committee Records:</b> Documents pertaining to the service of individuals on University or Department committees and boards. Includes agendas, meeting minutes, reports, working papers, related documentation and correspondence. The materials in this series do not include the University's Board of Trustee Committee Records.	Current + 5 years.	Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-GEN-7
<b>Computer-Generated Reports</b>	Reference the Specific Document Category and Retention Period; otherwise, retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-8
<b>Correspondence:</b> Correspondence concerning day-to-day office administration and activities; significant information about programs of a unit, fiscal status, or routine operations.	Current + 5 years.  Most correspondence should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract.	Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-GEN-9
<b>Drafts and Working Papers</b>	Retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-10
<b>Organization Charts (Institutional and Departmental)</b>	Retain until obsolete, superseded or administrative value is lost; then transfer to University Archives for permanent retention.  Copies shall be appropriately dated to identify relevant period of effectiveness.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-11 ARCH-6

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Policies and Procedures (Academic or Administrative Center-Specific):</b> Includes handbooks, mission and policy statements, official procedure guidelines, and directives.	5 years post-revision; then transfer to University Archives for permanent retention.	FLA. STAT. § 95.11(2) University Policy	Relevant Academic or Administrative Center	ADM-GEN-12 ARCH7
<b>Policies and Procedures (University-Wide):</b> Includes handbooks, mission and policy statements, official procedure guidelines, organization charts.	5 years post-revision; then transfer to University Archives for permanent retention.	FLA. STAT. § 95.11(2) University Policy	Relevant Administrative Center	ADM-GEN-13 ARCH-8
<b>Training Certification Records:</b> Record of completion of University- or Department-centered training courses. Does not include hazardous material training.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	FLA. STAT. § 95.11(2)	Office of Human Resources	OHR-3
<b>Training Material Records:</b> Materials used in training, such as films, slides, commentaries, manuals, workbooks and other related items. This record does not include individual training records.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	ADM-SP-15
<b>Transitory Messages:</b> Records having short-term value based upon the content and purpose of the message. Examples include, but are not limited to, e-mail messages or other communications reminding employees about scheduled meetings or appointments; most telephone messages; announcements of office events such as holiday parties or group lunches; and recipient copies of announcements of University-sponsored events, such as exhibits, lectures, workshops, etc.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-14
<b>Tuition and Fee Schedules</b>	Current + 5 years; then transfer to University Archives for permanent retention.	FLA. STAT. § 95.11(2)	Office of University Bursar	BUR-1
<b>Vendor Promotional Materials:</b> Include promotional materials relating to supplies, services, and products. Materials include advertisements, brochures, and catalogs.	Retain until no longer needed.	University Policy	Relevant Academic or Administrative Center	ADM-SP-16

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>H. <u>GRANTS, RESEARCH AND SPONSORED PROGRAMS</u></b>				
<b>H1. <u>FOOD &amp; DRUG ADMINISTRATION ("FDA") RECORDS:</u></b> Records related to studies involving investigational new drugs and devices.				
<b>Case Histories of Research Subjects:</b> Documentation that records all observations and other data pertinent to the investigation on each individual administered the investigational drug or employed as a control in the investigation. Case histories include case report forms and supporting data, including signed and dated consent forms.	To be retained by the Investigator for two (2) years following the date a marketing application is approved for the drug for the indication for which it is being investigated.  If no application is to be filed, or the application is not approved for such indication, the records are to be retained by the Investigator for two (2) years after the investigation is discontinued and the FDA is notified of same.	21 C.F.R. § 312.62 21 C.F.R. § 812.140	Principal Investigator	PI-1
<b>Records of Receipt, Shipment or Disposition of an Investigational New Drug:</b> Records documenting the receipt, shipment, and disposition of the drug, including dates, quantity, and use by subjects.	To be retained by the Investigator for two (2) years following the date a marketing application is approved for the drug for the indication for which it is being investigated.  If no application is to be filed, or the application is not approved for such indication, the records are to be retained by the Investigator for two (2) years after the investigation is discontinued and the FDA is notified of same.	21 C.F.R. § 312.62 21 C.F.R. § 812.140	Principal Investigator	PI-2

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>H2. <u>INSTITUTIONAL ANIMAL CARE AND USE COMMITTEE ("IACUC") RECORDS</u></b>				
<b>Animal Health &amp; Welfare Records:</b> Records associated with an animal needed to convey necessary information to all involved in the animal's care in contemplating utilizing these animals in research and to share with regulatory agencies responsible for verifying the appropriate provision of veterinary care. Also includes information as specified on any animal sold, euthanized, or otherwise disposed of; information as specified on any live animal acquired, purchased or otherwise held; proposed activities involving animals, including documentation of IACUC approval or denial, minutes, semi-annual inspections, and research records associated with the protocol; and proposed significant changes in activities involving animals, including documentation of IACUC approval or denial.	Records that relate to ongoing activities of the IACUC shall be maintained for the duration of the activity plus three (3) years.	Animal Welfare Act, 9 C.F.R. § 2.35; NIH Institutional Animal Care & Use Committee Guidebook, p. 174	Institutional Animal Care and Use Committee ("IACUC")	GRSP-1
<b>IACUC Records:</b> Includes IACUC Committee meeting minutes, deliberations and activities of the Committee, records of attendance, IACUC reports and recommendations, reports and recommendations as forwarded to the institutional official, records of accrediting body determinations, approval applications/forms, grant proposals, and research protocols.	Records that relate to ongoing activities of the IACUC shall be maintained for the duration of the activity plus three (3) years.	9 C.F.R. § 2.35 NIH Institutional Animal Care & Use Committee Guidebook	Institutional Animal Care and Use Committee ("IACUC")	GRSP-1
<b>H3. <u>INSTITUTIONAL REVIEW BOARD ("IRB") RECORDS</u></b>				
<b>Institutional Review Board Records:</b> Includes correspondence between IRB and Investigators, submissions and all versions of protocols, whether initiated or not; consent documents, including approved sample consent documents; scientific evaluations; progress reports; records of continuing review activities; reports of injuries to subjects; and statements of significant new findings provided to subjects.	Current + at least three (3) years.  For records relating to research that is currently being conducted, at least three (3) years after completion of the research, or in accordance with award stipulations, whichever is longer.	21 C.F.R. § 56.115(a)-(b) 45 C.F.R. § 46.115(a)-(b)	IRB Administrator	IRB-1

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>H4. <u>RESEARCH / SCIENTIFIC MISCONDUCT RECORDS</u></b>				
<b>Research/Scientific Misconduct Records</b>	7 years after completion of any proceeding or the completion of any PHS proceeding involving the research misconduct allegation, whichever is later.	42 C.F.R. § 93.317	Office of Research and Technology Transfer	RTT-2
<b>H5. <u>SPONSORED PROGRAMS RECORDS</u></b>				
<b>Award Files (Sponsored Programs/Research):</b> Files containing applications and proposals, F & A waivers, conflict of interest forms, approvals, e-mail correspondence prior to award acceptance, award documents, budget information, reporting, assurances, certifications, other relevant award documentation on program grants received by faculty members from federal and state agencies and private foundations.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Office of Sponsored Programs	GRSP-2
<b>Clinical Trial or Research Agreements:</b> Includes agreements for basic, applied, or clinical trial research.	Current + at least three (3) years, or in accordance with award stipulations, whichever is longer.	21 C.F.R. § 56.115(b) 45 C.F.R. § 46.115(b)	Office of Clinical Research	GRSP-3
<b>Cost Sharing Effort Requests:</b> Information concerning employees who are anticipated to contribute effort toward cost-sharing obligations of sponsored projects.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Office of Sponsored Programs	GRSP-4

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Effort Certification Reports:</b> Record of the employee's activity for the month in compliance with federal regulations.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Office of Sponsored Programs	GRSP-5
<b>Fee-for-Service Financial Reporting Records (Sponsored Programs):</b> Includes account request forms, billing records, financial reports, receipts and related communications.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Principal Investigator	GRSP-6
<b>Financial Conflict of Interest Disclosures for Sponsored Programs:</b> Includes records disclosing significant financial interests and determinations as to same, appeal, and documents regarding all actions taken to resolve actual or potential conflicts of interest.	Records of all financial disclosures and all actions taken by the institution with respect to each conflicting interest must be maintained at least three (3) years after the date of the submission of the final expenditures report.	42 C.F.R. § 50.604(e) 45 C.F.R. § 94.4(i)	Office of Sponsored Programs	GRSP-7
<b>Financial Reporting Records (Sponsored Programs):</b> Includes account request forms, final invoices, final financial reports, receipts and related communications.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department	Office of Sponsored Programs	FIN-1

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	<b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	of State, Division of Library and Information Services		
<b>Invoice and Expense Supporting Documents (Sponsored Programs)</b>	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Principal Investigator	GRSP-8
<b>Material Transfer Agreements:</b> Agreements to exchange biological and physical materials to conduct research, evaluate the materials, and explore collaborations; licensing; and other research-premised or intellectual property business arrangements.	Permanent.	University Policy	Office of Research and Technology Transfer	RTT-1
<b>Request for Use of Unobligated Balance from a Fixed-Price Grant/Contract</b>	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Office of Sponsored Programs	GRSP-9
<b>Research Drug Inventory Records:</b> Includes invoices and packing slips for controlled substances obtained for research purposes. Does not include any controlled substances utilized for teaching purposes only.	2 years from the date of such inventory or records.	21 C.F.R. § 1304.04(a)	Principal Investigator	GRSP-10

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Unfunded Proposals:</b> Applications and proposals by faculty and grants that were not funded.	One (1) year.	University Policy	Office of Sponsored Programs	GRSP-11
<b>Waivers of Facilities and Administration Costs (Indirect Costs)</b>	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Office of Sponsored Programs	GRSP-12
<b>I. INCIDENT REPORTING AND RISK MANAGEMENT</b>				
<b>Accident and Injury Reports (Environmental Health &amp; Safety):</b> Reports of exposure, chemical, biological, or radiological spill, fire, explosion, crush, electrical shock, fall, entrapment, etc., regardless of whether an injury occurred.	30 years.	29 C.F.R. § 1910.1020	Environmental Health Services	EHS-6
<b>Accident Reports/Claims (Settled Cases)</b>	7 years after claim settled.	FLA. STAT. § 95.11(3) NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Risk Management	RSK-3
<b>Authorized University Driver Records:</b> Includes records and documentation authorizing individuals to drive University-owned vehicles; driving records; consent to obtain State Motor Vehicle Records; and insurance coverage.	Active + 4 years.	FLA. STAT. § 95.11(3) University Policy	Risk Management	RSK-4
<b>Blood Borne Pathogen/Asbestos/Mold Exposure:</b> Medical Records of employees known or suspected to have come into contact with blood or other potentially hazardous materials. These Records may include, but are not limited to, the employee's name; social security number; Hepatitis B vaccination status, including the dates of testing, results of examinations, medical testing, and follow-up procedures; a copy of the healthcare professional's written opinion; a list of complaints potentially related to the exposure; a copy of	Duration of employment + 30 years after termination, retirement, or separation from employment.  Original Records to be retained with Office of Record for 30 days then transferred to Risk Management for remainder of	29 C.F.R. § 1910.1001 29 C.F.R. § 1910.1020 29 C.F.R. § 1910.1030	HPD Infection Control Coordinator or Environmental Health Services	HCLNIC-1 EHS-7

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*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
information provided to the healthcare professional; and Records documenting the exposure or possible exposure of an employee to a blood borne pathogen, contagion, radiation, and chemicals above the acceptable limits or dosage, including statistical analyses, incident reports, material safety data sheets, copies of Medical Records or reports, risk management assessments, and other necessary data to support the possibility of exposure.	retention period.			
<b>Certificates of Insurance</b>	Current + 15 years.	FLA. STAT. § 95.11	Risk Management	RSK-5
<b>Chemical and Hazardous Waste Inventory, Disposal and Shipping Records:</b> Includes documents that reflect the receipt, shipment, and disposal of chemical material or hazardous wastes on campus. This series includes, but is not limited to, chemical and waste inspection forms; drum packing sheets; Uniform Hazardous Waste Manifest forms (EPA 8700); Certificates of Disposal from vendors; land disposal notification forms; waste disposal records; and related documentation and correspondence.	30 years.	7 C.F.R. § 73.17 9 C.F.R. § 121.17 29 C.F.R. § 1910.1020 42 C.F.R. § 73.17	Environmental Health Services	EHS-8
<b>Chemical Spill Management Records</b>	30 years. Original Records to be retained with Office of Record for 30 days then transferred to Risk Management for remainder of retention period.	29 C.F.R. § 1910.1020	Environmental Health Services	EHS-9
<b>Hold Harmless Agreements</b>	5 years following termination of agreement.	FLA. STAT. § 95.11(2)	Office of Legal Services	LEG-2
<b>Insurance Records:</b> Consists of all policies, applications, correspondence and premium payment records which includes fire, theft, etc. on University property and/or employees. May also consist of a list of any insurance carriers and the premium payment amounts paid to them. This does not include health, life or other employee benefit policies maintained by the Office of Human Resources.	Permanent.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Risk Management	RSK-6
<b>OSHA Forms 101/200/300/300A</b>	30 years.  If employer is required to conduct medical examinations, monitor for exposure to hazardous materials or	15 U.S.C. § 2607(c) 29 U.S.C. § 657 29 C.F.R. § 1910.1020	Risk Management	RSK-7

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	chemicals or monitor significant adverse reactions to health of employees, those records must be kept for the duration of employment plus 30 years.			
<b>OSHA Form 102/300A (Annual Summary)</b> Note: Used to be Form 102, but replaced by Form 300A.	30 years.	29 C.F.R. § 1904.5	Environmental Health Services	EHS-10
<b>OSHA Form 200/300 Log and Records:</b> All records of occupational injuries and illnesses.	30 years.	29 C.F.R. § 1904.5 29 C.F.R. § 1904.33 University Policy	Risk Management	RSK-8
<b>Performance Bonds</b>	5 years after closed, terminated, completed, expired.	FLA. STAT. § 95.11(2)	Risk Management	RSK-9
<b>Red Flag Program Investigative Files</b>	10 years.	15 U.S.C. § 1601 15 U.S.C. § 1681 16 C.F.R. § 1681	Risk Management	RSK-10
<b>Surety Bonds (Non-Architectural or Construction):</b> Includes out-of-state performance bonds, educational bonds, etc.	5 fiscal years after paid, exchanged, or transferred and recorded in bond register provided applicable audits have been released.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL University Policy	Risk Management	RSK-11
<b>J. INFORMATION TECHNOLOGY AND SYSTEM SECURITY</b>				
The following retention periods set forth below apply to the main NSU computer network system. Note that certain exceptions apply with respect to the security requirements of HIPAA-related records.				
<b>Audit Trail Records:</b> Files needed for electronic data audits. Does not include any electronic security audit trail records required to be maintained under HIPAA.	3 months active + 12 months archived, provided applicable audits have been released.	Florida General Records Schedule GS1-SL University Policy	Office of Innovation and Information Technology	OIIT-1
<b>Computer System and Network Security Records:</b> Includes computer and network usage and security reports and records; wireless network security records, quality assurance records. Does not include "Red-Flag" suspicious activity or security breach records.	One (1) year.  HIPAA-Related Records to be retained six (6) years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	National Archives & Record Administration General Records Schedule 24 University Policy	Information Security Officer	OIIT-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Copies of or Other Records of Security Reminders (HIPAA Requirement)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-3
<b>Documentation of Backup Procedures, Schedules and Periodic Testing of Backup/Recovery Procedures (HIPAA Requirement)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-4
<b>Electronic Security ("Audit Trail") Records:</b> Includes documentation of audit trail reviews, including random and selective/focused audits. This Record Set relates to any audit trail review undertaken for HIPAA Security purposes.	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.  "Audit Logs" will be retained for a time period sufficient to allow for periodic review.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-5
<b>Hardware Documentation:</b> Operational and maintenance requirements of computer hardware.	Life of the Hardware.	University Policy	Office of Innovation and Information Technology	OIIT-6
<b>Imaged or Scanned Records:</b> Does not include Records <u>originally</u> created electronically.	Reference the Specific Document Category and Retention Period. A Record's mandatory minimum retention period is counted from the creation or receipt of the <u>Original Record</u> , not the date on which the substitute image was created.	Fla. Admin. Code r. 1B-24.003 Fla. Admin. Code r. 1B-26.003	Relevant Academic or Administrative Center	OIIT-7
<b>Input Documents:</b> Copies of records or forms designed and used solely for data input and control when the data processing unit provides centralized data input services and original records are retained by the program unit.	Destroy after use.	University Policy	Relevant Academic or Administrative Center	ADM-SP-17

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Inventory of all Hardware, Software and Information Systems and Locations (HIPAA Requirement)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.310 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-8
<b>List of All Users with Access to NSU Information Systems and Level of Privileges (HIPAA Requirement):</b> Information includes user account records, security logs, level of privileges and password files.	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-9
<b>Network Diagrams and Schematics</b>	Retain until obsolete, superseded or administrative value is lost.	University Policy	Office of Innovation and Information Technology	OIIT-10
<b>Network Maintenance Logs (HIPAA Requirement)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.310 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-11
<b>Network Operation Tests and Evaluations:</b> Routine or benchmark data sets, related documentation, and test results constructed or used to test or develop a system.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Office of Innovation and Information Technology	OIIT-12
<b>Network Security Policies and Procedures</b>	Retain for one (1) year after system is superseded, then transfer to University Archives for permanent retention.	University Policy	Office of Innovation and Information Technology	OIIT-13
<b>Operating System and Hardware Conversion Plans</b>	Conversion + one (1) year.	University Policy	Office of Innovation and Information Technology	OIIT-14
<b>Requests for Mass Distribution of Electronic Mail Messages:</b> Entire University population.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Originating Academic or Administrative Center	OIIT-15

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Requests for Network Services:</b> Includes requests for installation of web-based programs, requests for information (internal), and other network services requests.	60 days.	University Policy	Office of Innovation and Information Technology	OIIT-16
<b>Security Breach Records (Identity Theft):</b> Includes investigation reports of identified patterns, practices, or activities that demonstrate acquisition, access, use or disclosure of personal information which may result in identity theft; as well as claim forms and record of action taken.	10 years after record action taken.	15 U.S.C. § 1601 15 U.S.C. § 1681 16 C.F.R. § 1681 University Policy	Risk Management	RSK-12
<b>Security Breach Records (Networks and Systems):</b> Includes investigation reports of identified patterns, practices, or activities that demonstrate a breach of the University's networks and systems, including record of action and claim forms (if warranted). These Records include investigations related to FERPA, HIPAA, and Gramm-Leach Bliley security requirements, but do NOT include FTC "Red Flag" security regulations.	2 years after completion of internal investigation.  HIPAA-Related Security Incident Reports and Investigations to be retained 6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	University Policy	Information Security Officer	OIIT-17
<b>Software Management Records:</b> Includes software registrations, site licenses, software inventories, software purchase agreements, warranties and Software Licensing Agreements, and related documents.	Life of Software Use.	University Policy	Office of Innovation and Information Technology	OIIT-18
<b>Security Risk Analysis and Documentation of Periodic Evaluation (HIPAA Requirement)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-19
<b>Status Codes for Students and Employees</b>	Permanent.	University Policy	Office of Innovation and Information Technology	OIIT-20
<b>Suspicious Activity Records (Identity Theft):</b> Includes identified patterns, practices, or activities that indicate the possible existence of identity theft; record of action taken.	10 years after record action taken.	15 U.S.C. § 1601 15 U.S.C. § 1681 16 C.F.R. § 1681 University Policy	Risk Management	RSK-13

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Suspicious Activity Records (Networks and Systems)</b>	60 days.  If suspicious activity review results in an identified security breach, see retention period for Security Breach Records.	University Policy	Information Security Officer	OIIT-21
<b>System Backup Files:</b> Records needed to restore a system to current operational state.	There is no retention schedule for backup files or other forms of data backup. A backup tape or drive should be just that: a data/records backup kept solely as a security precaution, but not intended to serve as the Record Copy or as a Records retention tool.	University Policy	Office of Innovation and Information Technology	OIIT-22
<b>System Users Access Records:</b> Electronic or textual records created to control or monitor individual access to a system and its data created for security purposes.	6 years from the date of its creation, the date when it last was in effect, or in accordance with the governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-23
<b>University Computer Account Records (NSU E-mail Account)</b>	Permanent.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-5
<b>K. <u>INSTITUTIONAL DOCUMENTS</u></b>				
<b>Accreditation Records (Non-SACS):</b> Includes progress reports and final self-study accreditation report documenting the process and status of becoming accredited and/or activities associated with reporting and/or confirming the accreditation status of school.	One full accreditation cycle after most recent accreditation determination, then transfer to University Archives for permanent retention.	Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-SP-19 ARCH-10
<b>Accreditation Records (Non-SACS): Supporting Documents:</b> Consists of supporting documents referenced or relied upon in developing progress reports of final self-study.	One (1) year after accreditation determination, then transfer to University Archives for permanent retention.	Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-SP-20

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Accreditation Records: Southern Association of Colleges and Schools (SACS):</b> Consists of accreditation records, visiting accreditation team reports, related correspondence, board reviews, updates and status documentation, and supporting documents.	10 years, then transfer to University Archives for permanent retention.	Florida General Records Schedule GS5 University Policy	Office of Institutional Effectiveness	INST-EFF-1 ARCH-11
<b>Addresses, Speeches and Talks:</b> Speeches written and/or given by any Department Chair, Professor, or visiting dignitary, either on or off campus.	Permanent.	University Policy	University Archives	ARCH-9
<b>Artifacts/Memorabilia</b>	Transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	INST-1 ARCH-12
<b>Biographical Materials: Faculty/Administrators:</b> Includes, but is not limited to, vitae information, publications, honors, certifications.	Permanent.	University Policy	Relevant Academic or Administrative Center	INST-2
<b>Board of Trustee Committee Records:</b> Includes agendas, meeting minutes, reports, working papers, related documentation and correspondence.	Transfer to University Archives for permanent retention.	University Policy	Board of Trustees	INST-GOV-1
<b>Board of Trustee Governance Records:</b> Includes meeting notices, agendas, meeting minutes, membership lists, other informational documentation, including relevant correspondence to Board activity.	Transfer to University Archives for permanent retention.	University Policy	Board of Trustees	INST-GOV-2
<b>Bylaws and Charters</b>	Transfer to University Archives for permanent retention.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	University Archives	ARCH-13
<b>Commencement Program and Records</b>	Transfer to University Archives for permanent retention.	University Policy	University Archives	ARCH-14
<b>Directives of the President/Provost/Chancellor:</b> Consists of official statements of policy from the President's or Provost's Office for the University, including all memoranda and correspondence generated relating to the policies and procedures that are to be followed by employees.	Transfer to University Archives for permanent retention.	University Policy	Relevant Executive Office	INST-3 ARCH-15
<b>Distinguished Speaker Series Records</b>	Retain until obsolete, superseded or administrative value is lost, then transfer to University Archives for	University Policy	Relevant Academic or Administrative Center	INST-4 ARCH-16

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	permanent retention.			
<b>Films, Videos, Audiotapes</b>	Transfer to University Archives for permanent retention.	University Policy	University Archives	ARCH-17
<b>Governance Records (Other):</b> Includes meeting notices, agendas, meeting minutes, membership lists, other documentation, including relevant correspondence. Does NOT include Board of Trustee Records.	Transfer to University Archives for permanent retention.	University Policy	Relevant Governing Body	INST-GOV-3
<b>Lecture and Lecture Series Records:</b> Includes committee minutes/notes; financial support records; lecture recordings and transcripts; program records and announcements.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Relevant Academic or Administrative Center	INST-5 ARCH-8
<b>Maps and Architectural Plans</b>	Transfer to University Archives for permanent retention.	University Policy	University Archives	ARCH-19
<b>Mission Statement</b>	Permanent.	University Policy	Relevant Executive Office	INST-6
<b>News and Press Releases</b>	Office of Record to retain for 90 days then transfer to University Archives for permanent retention.	University Policy	University Relations	INST-7
<b>Newspaper and Magazine Articles (University-Related)</b>	Transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	INST-8 ARCH-20
<b>Oral Histories, Reminiscences, Interviews, Transcripts, Tapes</b>	Transfer to University Archives for permanent retention.	University Policy	University Archives	ARCH-21
<b>Organization Charts (Institutional and Departmental)</b>	Retain until obsolete, superseded or administrative value is lost, then transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-11 ARCH-6

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Photographs, Scrapbooks, Albums, Class Pictures</b>	Transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	INST-9 ARCH-23
<b>Policies and Procedures (Academic or Administrative Center-Specific):</b> Includes handbooks, mission and policy statements, official procedure guidelines, and directives.	5 years post-revision, then transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	ADM-GEN-12 ARCH-7
<b>Policies and Procedures (University-Wide):</b> Includes handbooks, mission and policy statements, official procedure guidelines, organization charts.	5 years post-revision, then transfer to University Archives for permanent retention.	University Policy	Relevant Administrative Center	ADM-GEN-13 ARCH-8
<b>State Licensing Records (Institutional)</b>	Permanent	University Policy	State Relations and Licensure	INST-EFF-2
<b>Strategic Plan</b>	Permanent.	University Policy	Office of Institutional Effectiveness	INST-EFF-3
<b>University Graphic Identity Components:</b> Includes University trademarked logos and unrelated marks.	Permanent.	University Policy	Office of Publications	INST-10 BSV-16
<b>University-Published Journals or Periodicals:</b> Includes faculty scholarly or professional journal publications, student publications.	Transfer to University Archives for permanent retention.	University Policy	University Archives	ARCH-24
<b><u>L. INSTITUTIONAL FINANCIAL &amp; ACCOUNTING RECORDS</u></b>				
<b><u>L1. AUDIT RECORDS (ACCOUNTING)</u></b>				
<b>Audit Reports: Independent:</b> Audits conducted by an independent accounting firm on an annual basis.	Permanent.	Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Controller's Office	FIN-2
<b>Audit Reports: Internal:</b> Audits conducted by University auditor.	5 fiscal years after completion of audit.  Working papers will be purged once a year after the Director's approval.	Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Internal Auditing Department	INST-11

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*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Internal Reports and Analysis (Not Conducted By University Auditor)</b>	5 fiscal years after completion of audit.	Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Relevant Financial Operations Division	FIN-3
<b>L2. <u>BANKING &amp; INVESTMENT RECORDS</u></b>				
<b>Bad Check Records:</b> Itemization of bad checks received.	7 years provided applicable audits have been released.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Treasury Operations	FIN-4
<b>Bank Account Authorization Records:</b> Authorizations to maintain a bank account and who is authorized to sign off on the account.	7 years from date authorization superseded, expired or cancelled, provided applicable audits have been released.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures	Treasury Operations	FIN-5
<b>Bank and Investment Statements:</b> Periodic statement of balances, deposits and withdrawals.	3 years provided applicable audits have been released.	Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Treasury Operations	FIN-6
<b>Bank Statement Reconciliations:</b> Explanations of differences between bank statement balance and actual balance and investment-related transactions.	3 years provided applicable audits have been released.	Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies and Procedures Manual, § 125.1	Treasury Operations	FIN-7
<b>Construction or Architectural Surety Bonds</b>	7 fiscal years after paid, exchanged, or transferred and recorded in bond register provided applicable audits have been released.	University Policy	Treasury Operations	FIN-8

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(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Wire Transfer Records:</b> Includes requests for outgoing wire transfer and supporting documentation.	7 years provided applicable audits have been released.	University Policy	Treasury Operations	FIN-9
<b>L3. BUDGET RECORDS</b>				
<b>Budget Records: Approved Annual Budget:</b> Final, approved, yearly budget for University, usually in printed form and amendments which are filed chronologically.	7 years provided applicable audits have been released.	University Policy	Office of Budget Administration	FIN-10
<b>Budget Records: Supporting Documents:</b> Budget requests, including program plans for coming year, usually by cost center.	4 years.	University Policy	Relevant Academic or Administrative Center	ADM-SP-20
<b>Budget Transfer Forms:</b> Forms that document interdepartmental payments.	1 year.	University Policy	Office of Budget Administration	FIN-11
<b>General Ledgers and Sub-Ledgers/Year-End Trial Balance:</b> A book containing a summary or detail of all transactions affecting the accounts of the institution.	7 years.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-12
<b>Invoices:</b> Bills for goods shipped or services rendered. Usually matched to purchase orders and delivery slips and attached to voucher for payment.	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Accounts Payable	FIN-13
<b>Invoices (Sponsored Program Funding):</b> Original invoices tied to Sponsored Program funding and submitted for payment via an electronic e-procurement system.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Principal Investigator	GRSP-8
<b>Journal Entries by Financial Operations:</b> Includes brief descriptions and supporting documents.	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Treasury Operations	FIN-14
<b>Petty Cash Account Records:</b> Includes Records reflecting authorization for petty cash account.	3 years after the account has been closed.	NSU Accounting & Financial Policies and Procedures, § 125.1	Accounts Payable	FIN-15
<b>Receipts:</b> Includes wire, ACH, cash, check, credit/debit payment card receipts and supporting documentation.	7 years provided applicable audits have been released.	NSU Financial Operations: Treasury Department	Any Academic or Administrative	FIN-16 ADM-SP-21

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	Payment Card Data shall be securely maintained for 1 year or less, unless specific business needs require longer retention and destroyed consistent with NSU FOP-Treasury Department Policy No. 101 (Payment Card Data Retention and Disposal Policy).	Policy No. 101: Payment Card Data Retention and Disposal Policy	Unit that collects and receives funds.	
<b>L4. GENERAL FISCAL RECORDS: SOURCE &amp; SUPPORTING DOCUMENTS</b>				
<b>Accounts Receivable:</b> Amounts due from others on open accounts as a result of providing goods and services.	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Relevant Academic or Administrative Center	FIN-17 ADM-SP-22
<b>Cash Collection Records:</b> Includes, but is not limited to, daily cash listings, copies of receipts, daily cash register tapes, cash collection and deposit slips used to balance cash deposits.	3 fiscal years or until applicable audits have been released, whichever is greater.	26 U.S.C. § 6501(a) University Policy	Any Academic or Administrative Unit that collects and receives cash funds.	ADM-SP-23
<b>Check Registers:</b> Book or original entry for all cash disbursements paid by check.	7 years provided applicable audits have been released.	26 U.S.C. § 6501(a) University Policy	Payroll Department; Accounts Payable	PAY-1 FIN-36
<b>Employee Expense Reimbursement Records (Non-Sponsored Programs):</b> Includes travel, moving, purchase reimbursement requests and supporting documentation.	7 years provided applicable audits have been released.  Any supporting documentation required to be maintained for non-sponsored programs beyond the 7-year minimum period for shall be retained by the individual department.	26 U.S.C. § 6501(a) University Policy	Accounts Payable	FIN-18
<b>Employee Expense Reimbursement Records (Sponsored Programs):</b> Original supporting documentation for Employee Expense Reimbursement Records tied to Sponsored Programs funding and submitted for payment via an electronic e-procurement system.	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11	Principal Investigator	GRSP-8

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	<b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	State of Florida Department of State, Division of Library and Information Services		
<b>Sales Tax Records:</b> Includes copies of sales tax reports, back up transaction documents, and ledgers.	Permanent.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-20
<b>W-9/OFAC Review Records</b>	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Accounts Payable/ Purchasing	FIN-19 PUR-1
<b>L5. GENERAL FISCAL RECORDS &amp; SUMMARY REPORTS</b>				
<b>Accounting Estimates:</b> Estimates calculated in furtherance of interim and annual financial statements including documentation supporting all key conclusions, bases and other elements associated with each accounting estimate.	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-21
<b>Bond Registers:</b> Listing of bonds sold, usually for building projects, showing purchaser, date redeemed, interest due, etc.; can also include performance bonds.	Permanent.	University Policy	Treasury Operations	FIN-22
<b>Chart of Accounts:</b> List of all accounts used by an organization with each account usually assigned a number or code.	Permanent.	University Policy	Controller's Office	FIN-23
<b>Collection Records:</b> Includes bad debt actions for overdue accounts, such as library fines, parking tickets, loans, payment for services rendered.	7 years after final payment or settlement.	University Policy	Office of Legal Services or its Designee	LEG-3
<b>Control List of all Operating and Capital Leases:</b> Includes all relevant lease terms, including a schedule of future annual lease payment obligations.	Permanent.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-24
<b>Financial Statements (Monthly):</b> Includes Statement of Financial Position; and Statement of Activities.	7 years.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-25
<b>Financial Statements (Year-End):</b> Includes Statement of Financial Position; Statement of Activities; and Statement of Cash Flows.	Permanent.	NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-26

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Merchant Services Agreements</b>	Current + 7 years.	University Policy	Treasury Operations	FIN-27
<b>Notes/Bonds Payable Schedules</b>	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Treasury Operations	FIN-28
<b>Original Application for Recognition of Tax-Exempt Status (Form 1023 or Form 1024) and all Accompanying Schedules and Attachments</b>	Permanent.	26 U.S.C. § 501(c)(3) University Policy	Controller's Office	FIN-29
<b>Payment Card Data:</b> Includes primary account number (PAN), expiration date, cardholder name, and service code.	One (1) year or less unless specific business needs require longer retention.	NSU Financial Operations: Treasury Department Policy No. 101: Payment Card Data Retention and Disposal Policy	Treasury Operations and any other Academic or Administrative unit which processes credit cards.	FIN-30 ADM-SP-24
<b>Quarterly State Unemployment Taxes</b>	7 years provided applicable audits have been released.	University Policy	Payroll Department	PAY-3
<b>Reconciliation of A/P Subsidiary Ledger to General Ledger</b>	7 years provided applicable audits have been released.	NSU Accounting & Financial Policies and Procedures, § 125.1	Accounts Payable	FIN-31
<b>Tax Returns and Worksheets, Examination Reports and Other Documents Relating to Determination of Income Tax Liability.</b>	Permanent.	26 U.S.C. § 6501(a) NSU Accounting & Financial Policies and Procedures, § 125.1	Controller's Office	FIN-32
<b>Tuition Waiver Records</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, whichever is later.	Florida General Records Schedule GS5 University Policy	Office of Human Resources	OHR-4
<b>Unclaimed Intangible Property:</b> Includes, but is not limited to monies, checks, drafts, deposits, interest, dividends, income, customer overpayments, security deposits, refunds, unpaid wages, amounts distributable from a trust or custodial fund established under a plan to provide any health, welfare, pension, vacation, severance, retirement, death, stock purchase, profit sharing, employee savings, supplemental unemployment insurance, or similar benefit.	5 years after the property becomes reportable. The reportable period varies by property type and state. As such, please refer to the applicable State's Escheatment Requirements.	Chapter 717, Florida Statutes	Accounts Payable	FIN-33

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>M. <u>INSTITUTIONAL STATISTICS &amp; REPORTS</u></b>				
<b>Aggregate Institutional Data:</b> Data used to develop University-published reports.	Destroy after use.	University Policy	Office of Institutional Effectiveness	INST-EFF-4
<b>Annual Report of the President:</b> Reports put out by the President of the University providing information and statistics on the University.	Office of Record to retain 3 years then transfer to University Archives for permanent retention.	Florida Records Schedule GS5 University Policy	Relevant Executive Office	INST-12 ARCH-25
<b>Annual Reports: Academic or Administrative:</b> Summaries of department, university or division activities by year.	Office of Record to retain 3 years then transfer to University Archives for permanent retention.	University Policy	Relevant Academic or Administrative Center	ADM-SP-24 ARCH-26
<b>Annual Reports: Board of Trustees:</b> Annual program, narrative, and statistical reports issued by the highest level of authority within the University.	Transfer to University Archives for permanent retention.	University Policy	Relevant Governing Body	INST-GOV-3 ARCH-27
<b>Audit Reports: Internal:</b> Audits conducted by a University auditor.	5 fiscal years after completion of audit.  Working papers will be purged once a year after the Director's approval.	NSU Accounting & Financial Policies and Procedures, § 125.1	Internal Auditing Department	INST-11
<b>Economic Impact Reports:</b> University and Academic Reports.	Current + 5 years.	University Policy	Office of Institutional Effectiveness	INST-EFF-5
<b>Independent Colleges &amp; Universities of Florida (ICUF) Reports</b>	Current + 10 years, then transfer to University Archives for permanent retention.	University Policy	Office of Institutional Effectiveness	INST-EFF-6 ARCH-28
<b>Institutional Effectiveness Reports</b>	One (1) year after report.	University Policy	Office of Institutional Effectiveness	INST-EFF-7
<b>Institutional Progress Report</b>	One (1) year after report.	University Policy	Office of Institutional Effectiveness	INST-EFF-8



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Institutional Statistics:</b> This Record Set includes degree, enrollment, grade, labor and other calculated statistics for internal and external Institutional reporting.	Permanent.	University Policy	Office of Institutional Effectiveness	INST-EFF-9
<b>Matriculation Status Reports</b>	Current + one (1) year, then transfer to University Archives for permanent retention.	University Policy	Office of Institutional Effectiveness	INST-EFF-10 ARCH-29
<b>NSU Fact Book</b>	Transfer to University Archives for permanent retention.	University Policy	Office of Institutional Effectiveness	INST-EFF-11 ARCH-30
<b>Off-Campus Directory</b>	10 years, then transfer to University Archives for permanent retention.	Review for continuing historical value or administrative value and potential transfer to University Archives.	Office of Institutional Effectiveness	INST-EFF-12 ARCH-31
<b>SRK (Student-Right-to-Know) Graduation/Completion, Transfer-Out Data</b>	3 years from date of required disclosure.	University Policy	Registrar	ESS-2
<b>Statistical Consulting Center Records</b>	Permanent.	University Policy	Statistical Consulting Center	ADM-SP-25 ARCH-32
<b>Sunshine State Conference Reports</b>	Current + 10 years, then transfer to University Archives for permanent retention.	University Policy	Office of Institutional Effectiveness	INST-EFF-13 ARCH-33
<b>Survey Responses and Reports/Summaries:</b> Employee, student and alumni institutional surveys.	Survey Responses: Retain until obsolete, superseded or administrative value is lost.  Survey Reports/Summaries: Retain one (1) year after superseded by new report.	University Policy	Office of Institutional Effectiveness	INST-EFF-14
<b><u>N. LEGAL RECORDS</u></b>				
<b>Affiliation Agreements:</b> Includes any agreement between the University and a facility where University departments want to send University students for course-related and graduate required off-campus fieldwork experience (Internship). This record series can include, but is not limited to, affiliation agreements, memorandums of understanding, internship/externship agreements, and Residency/Fellowship agreements.	5 years after completion or termination of agreement or as required per relevant accreditation standards, whichever is longer.	FLA. STAT. § 95.11(2)	Office of Legal Services	LEG-3

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Bond Resolution:</b> Reports of principal, interest, paying agents and reports. Includes legal agreements made to finance buildings.	Permanent.	Florida General Records Schedule GS1-SL University Policy	Relevant Executive Office	INST-13
<b>Collaboration Agreements:</b> Includes any agreement to establish a collaboration with another academic or research institution for various educational, research, or commercial purposes. This Record series can include, but is not limited to, Articulation Agreements, Collaboration Agreements, Cooperation Agreements, and Memorandums of Understanding.	5 years after completion or termination of agreement or as required per relevant accreditation standards, whichever is longer.	FLA. STAT. § 95.11(2)	Office of Legal Services	LEG-4
<b>Confidentiality Agreements:</b> Includes agreements to exchange confidential information to explore collaborations, licensing and other business arrangements.	Permanent.	University Policy	Office of Legal Services or Designee	LEG-5
<b>Copyright Clearances</b>	Permanent.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Office of Innovation and Information Technology	OIIT-24
<b>Copyrights General Records:</b> Includes registrations and submittals, permission for use of others, disclosure of inventions and related records.	Permanent.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Office of Legal Services or Designee	LEG-6
<b>Facility Use Agreements:</b> Includes special event agreements for use of University facilities, including but not limited to, the Rose and Alfred Miniaci Performing Arts Center; the Museum of Art; the University Center and Arena; and other on-campus athletic facilities (extended use).	5 years after completion or termination of contract.	FLA. STAT. § 95.11(2)	Office of Legal Services	LEG-7
<b>Leases: Real Property:</b> Real property means land, buildings, and fixtures. Land and real property may be used interchangeably.	7 years after completion or termination of contract.	FLA. STAT. § 95.12 NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Office of Legal Services	LEG-8
<b>Legal Agreements:</b> Consists of legally binding contracts or agreements, and related addendums and appendices. File should include any relevant correspondence, reports, etc. relating to negotiation, fulfillment and termination of agreements. It can also include various agreements entered into for goods and services.	5 years after completion or termination of contract.	FLA. STAT. § 95.11(2)	Office of Legal Services	LEG-9

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Legislative Relations Records:</b> Includes bill review and tracking forms; copies of pending or approved legislation; working papers; related documentation.	Retain until obsolete, superseded, or administrative value is lost.	University Policy	Office of Community & Government Affairs	GOV-1
<b>License and Option Agreements (Intellectual Property):</b> Includes agreements to license or option to commercialize rights of patents, copyrights, trademarks, trade secrets or other intellectual property.	Permanent.	NSU Accounting & Financial Policies and Procedures, § 125.1 University Policy	Office of Technology Transfer	RTT-3
<b>Litigation Case Files:</b> Consists of legal documents, reports, notes, background material, etc. created in the preparation of handling legal disputes.	6 years after case closed or appeal process expired or conclusion of representation, whichever is longer.	University Policy	Office of Legal Services, General Counsel, or Designee	LEG-10
<b>Patents and Trademarks General Records:</b> Includes applications, contract awards, and progress reports.	Permanent.	NSU Accounting & Financial Policies and Procedures, § 125.1	Office of Technology Transfer	RTT-4
<b>Professional Service Agreements:</b> Includes agreements with individuals for services to be rendered in any professional field including but not limited to legal services, accountant services, health care related services or consultation agreements.	5 years after completion or termination of contract.  10 years for any professional services agreement for health care-related services.	FLA. STAT. § 95.11 31 U.S.C. § 3731 Pub. L. 100-93, § 3(b)	Office of Legal Services or General Counsel	LEG-11
<b>Provider Enrollment Agreements:</b> This Record Set includes agreements entered into on behalf of NSU Health/Mental Health Care Centers and Clinics and/or individual physician faculty members to provide services as an approved and enrolled member. This includes, but is not limited to, Medicaid/Medicare/CMS or other federal or state agency Enrollment Agreements, as well as private insurance carriers.	10 years after completion or termination of agreement or as required per relevant accreditation standards, whichever is longer.	31 U.S.C. § 3731 Pub. L. 100-93, § 3(b) AHIMA Recommended Records Retention Standards University Policy	Office of Legal Services	LEG-12
<b>Settlements and Releases</b>	Permanent.	University Policy	Office of Legal Services or General Counsel	LEG-13

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>O. <u>LIBRARY SYSTEM &amp; THE ALVIN SHERMAN LIBRARY</u></b>				
<b>Accounting Books (Alvin Sherman Library):</b> Relating to operating expenses of the Alvin Sherman Library and Parking Garage.	At least 7 years after the year in which such records were created provided applicable audits have been released whichever is later.	University Policy per Agreement with Broward County	Controller's Office	FIN-33
<b>Acquisitions Records and Inventory:</b> Includes records relating to the acquisition of library materials including, but not limited to, books, periodicals, software, compact discs, videotapes, audiotapes, and films.	3 fiscal years provided applicable audits have been released.	Florida General Records Schedule GS15 University Policy	Relevant University Library	LIB-1
<b>Alvin Sherman Library Records:</b> Includes acquisition records; annual reports; catalog records; circulation records; equipment use records; fines and replacement charges; interlibrary loan requests; program registrations; reference request records; user applications; user registrations.	Please reference Florida Department of State General Schedule for Public Libraries GS15.	Florida General Records Schedule GS15 University Policy	Alvin Sherman Library	LIB-2
<b>Annual Financial Report (Alvin Sherman Library and Parking Garage):</b> Includes balance sheet and operating statement of revenues and expenditures relating to Alvin Sherman Library and Parking Garage.	At least 7 years after the year in which such records were created.	University Policy per Agreement with Broward County	Controller's Office	FIN-34
<b>Audit Reports (Alvin Sherman Library – Annual):</b> With management letter and responses.	At least 7 years after the year in which such records were created.	University Policy per Agreement with Broward County	Controller's Office	FIN-35
<b>Automated Tape Library System Files</b>	At least 5 years after the year in which such records were created provided applicable audits have been released, whichever is later.	University Policy	Alvin Sherman Library	LIB-3
<b>Circulation Records:</b> Includes physical or electronic records of the loan of materials to library users, including records of overdue or delinquent materials.	Retain until transaction completed.	Florida General Records Schedule GS15 University Policy	Relevant University Library	LIB-4
<b>Duplication Records:</b> Records maintained to track reproduction of copyright-protected materials consistent with Copyright Law.	Current + 5 years.	FLA. STAT. § 95.11 University Policy	Alvin Sherman Library	LIB-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Fines and Replacement Charge Records</b>	7 years or until audit is complete, whichever is greater (ASL).	Florida General Records Schedule GS15 Agreement with Broward County University Policy	Relevant University Library	LIB-6
<b>Interlibrary Loan Request Records</b>	Retain until transaction completed.	Florida General Records Schedule GS15 University Policy	Relevant University Library	LIB-7
<b>Library Card Application Files (Public Members)</b>	Term of the Agreement with Broward County + until transaction has been completed.	University Policy per Agreement with Broward County	Alvin Sherman Library	LIB-8
<b>Library Exhibition Records</b>	Retain until transaction completed.	Florida General Records Schedule GS15 University Policy	Alvin Sherman Library	LIB-9
<b>Membership Files:</b> Electronic Records that establish that an individual has library-borrowing privileges and includes the individual's name and may include their address, telephone number, date of birth.	Retain for 30 days after expiration of User Registration.	Florida General Records Schedule GS15 University Policy	Relevant University Library	LIB-10
<b>P. <u>PATIENT CARE RECORDS</u></b>				
<b>P1. <u>CLINIC RECORDS</u></b>  See also NSU's <i>Records Management &amp; Destruction Policy</i> and NSU's <i>Medical Records Standards Policy</i> , applicable to any and all NSU Health/Mental Health Care Centers and Clinic staff who provide clinical care including faculty, researchers, trainees under appropriate supervision, and all persons providing clinical services who document in the Medical Record of a NSU Health/Mental Health Care Center or Clinic patient and/or client.				
<b>Abuse/Neglect Reporting Records:</b> Consists of any written record reporting known or suspected abuse, neglect or abandonment of a child, including but not limited to DC&F reporting forms.	Permanent.  For DC&F reporting, DC&F maintains Record Copy. A copy of the Record shall be maintained with the relevant reporting center.	Florida General Records Schedule GS7 University Policy	Relevant Administrative or Academic Unit	ADM-GEN-6

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Billing Records:</b> Any and all patient billing and documentation records, including, but not limited to: explanation of benefits, patient encounter forms/superbills, and financial hardship documentation.	12 years from date of last patient encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Relevant Health/ Mental Health Care Center or Clinic	HCLNIC-1
<b>Billing Records (Minors):</b> Any and all patient billing and documentation records, including, but not limited to: explanation of benefits, patient encounter forms/superbills, and financial hardship documentation.	12 years after minor reaches age 18.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) AHIMA Recommended Records Retention Standards University Policy	Relevant Health/ Mental Health Care Center or Clinic	HCLNIC-1
<b>Clinical Protocols/Pathways, Standard Practice Manuals, and Patient Care Practices</b>	Current + 12 years after superseded.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) AHIMA Recommended Records Retention Standards University Policy	Relevant Health/ Mental Health Care Center or Clinic	HCLNIC-2
<b>Compounding Records:</b> Written Record maintained for each batch/sub-batch of a compounded product pursuant to Florida law.	Current + 2 years.	Fla. Admin. Code. r. 64B16-27.700	Pharmacy Clinic	HCLNIC-3
<b>Cytology Slides [Negative]</b>	At least 2 years from the date of the examination.	42 C.F.R. § 493.1105(a)(7)(i) 31 U.S.C. § 3731(b) FLA. STAT. § 95.11(4)(b) Fla. Admin. Code r 64B8-10.002 University Policy	Relevant Health Care Center or Clinic	HCLINC-4
<b>Cytology Slides [Suspicious/Positive]</b>	12 years from date of last patient encounter.  Any signed narrative reports, interpretations, or sample tracings generated to report results must be maintained as part of the Medical Record.	FLA. STAT. § 95.11(4)(b) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) 42 C.F.R. § 493.1105 University Policy	Relevant Health Care Center or Clinic	HCLNIC-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Dental Implant Requests:</b> Written request for stock implants held in inventory.	12 years from date of last patient encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 University Policy	Dental Clinic	HCLINC-6
<b>Division of Clinical Operations Contracting &amp; Credentialing Department Credentialing Files</b>	Permanent.	University Policy	Division of Clinical Operations Contracting & Credentialing Department	HCLINC-7
<b>Electrocardiography ("EKG") Tracings/Strips</b>	12 years from date of last patient encounter.  Any signed narrative reports, interpretations, or sample tracings generated to report results must be maintained as part of the Medical Record.	FLA. STAT. § 95.11(4)(b) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) 42 C.F.R. § 482.26 University Policy	Relevant Health Care Center or Clinic	HCLNIC-8
<b>Histopathology Slides [Negative]</b>	At least 2 years from the date of the examination.	42 C.F.R. § 493.1105(a)(7)(i) 31 U.S.C. § 3731(b) FLA. STAT. § 95.11(4)(b) Fla. Admin. Code r 64B8-10.002 University Policy	Relevant Health Care Center or Clinic	HCLNIC-9
<b>Histopathology Slides [Suspicious/Positive]</b>	12 years from date of last patient encounter.  Any signed narrative reports, interpretations, or sample tracings generated to report results must be maintained as part of the Medical Record.	42 C.F.R. § 493.1105(a)(7)(i) 31 U.S.C. § 3731(b) FLA. STAT. § 95.11(4)(b) Fla. Admin. Code r 64B8-10.002 University Policy	Relevant Health Care Center or Clinic	HCLNIC-10
<b>Laboratory Analytic Systems, Quality Assessment, and Testing Records:</b> Includes quality control and patient test records, records documenting all analytic systems activities, test system performance specifications that the laboratory establishes or verifies for the period of time the laboratory uses the test system, proficiency testing records,	At least two (2) years.	42 C.F.R. § 493.1105(a)(3) 42 C.F.R. § 493.1105(a)(4) 42 C.F.R. § 493.1105(a)(5)	Relevant Health Care Center or Clinic	HCLNIC-11

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
and laboratory quality systems assessment records.				
<b>Laboratory Test Procedures:</b> Documentation reflecting each laboratory test procedure, including the dates of initial use and discontinuance of the test procedure.	At least two (2) years after a procedure has been discontinued.	42 C.F.R. § 493.1105(a)(2)	Relevant Health Care Center or Clinic	HCLNIC-12
<b>Laboratory Test Requisitions &amp; Authorizations</b>	12 years from date of last patient encounter.	42 C.F.R. § 493.1105(a)(6)(ii) 31 U.S.C. § 3731(b) FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 University Policy	Relevant Health Care Center or Clinic	HCLNIC-13
<b>Laboratory Test Reports:</b> Original laboratory test reports (including final, preliminary and corrected reports), including, but not limited to, immunohematology and pathology test reports.	12 years from date of last patient encounter.	42 C.F.R. § 493.1105(a)(6)(ii) 31 U.S.C. § 3731(b) FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 University Policy	Relevant Health Care Center or Clinic	HCLNIC-14
<b>Medical Records (Clinics/Centers/Departments):</b> This Record series consists of the current and complete Medical Record for every patient seeking care or service from an NSU Health Care Clinic, including dental care, mental health and drug addiction counseling. The Medical Record may include Records maintained in an Electronic Medical Record System.	12 years from date of last patient encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Relevant Health/ Mental Health Care Center or Clinic	HCLNIC-15
<b>Medical Records for Minors:</b> This Record series consists of the current and complete Medical Record for every patient, 17 years and younger, seeking care or service from an NSU Health Care Clinic, including dental care, mental health and drug addiction counseling. The Medical Record may include Records maintained in an Electronic Medical Record System.	12 years after minor reaches age 18.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) AHIMA Recommended Records Retention Standards University Policy	Relevant Health/ Mental Health Care Center or Clinic	HCLNIC-16
<b>Medication Care or Drug Therapy Management Records</b>	12 years from date of last encounter or per relevant Prescriber Care Plan.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Pharmacy Clinic	HCLNIC-17

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Patient Profiles for Medicinal Drug Dispensing</b>	Current + 2 years.  Patient profiles are to be maintained separate from the prescription order for all patients for whom the pharmacist orders and dispenses medicinal drug products.	Fla. Admin. Code r 64B16-27.800 Fla. Admin. Code r 64B16-28.140	Pharmacy Clinic	HCLNIC-18
<b>Pharmacy Inventory of Controlled Substances:</b> Includes detailed listing of controlled substances lost, destroyed or stolen, if any; the kind and quantity of such controlled substances and the date of discovering such loss, destruction or theft.	Current + 2 years.	FLA. STAT. § 893.07	Pharmacy Clinic	HCLNIC-19
<b>Pharmacy Prescription Dispensation Records:</b> Includes Records of dispensing for original and refill prescriptions.	2 years from the date of the last filling or as required by manufacturer contract, whichever is longer.	Fla. Admin. Code r 64B16-27.800 Fla. Admin. Code r 64B16-28.140	Pharmacy Clinic	HCLNIC-20
<b>Practitioner Rotation Schedules</b>	Current + 12 years.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Program Office	ADM-SP-26
<b>Prescription Records:</b> Includes written, faxed or electronic orders by a licensed practitioner for the preparation and administration of a drug or device for a patient. This includes any optical or hearing device prescriptions.	7 years from the date of initial entry into the data processing system.	FLA. STAT. § 893.07 Fla. Admin. Code r 64B16-27.800 Fla. Admin. Code r 64B16-28.140 University Policy	Relevant Health Care Center or Clinic	HCLNIC-21
<b>Provider Enrollment Agreements:</b> This Record Set includes agreements entered into on behalf of NSU Health/Mental Health Care Centers and Clinics and/or individual physician faculty members to provide services as an approved and enrolled member. This includes, but is not limited to, Medicaid/Medicare/CMS or other federal or state agency Enrollment Agreements as well as private insurance carriers.	10 years after completion or termination of agreement or as required per relevant accreditation standards, whichever is longer.	31 U.S.C. § 3731 Pub. L. 100-93, § 3(b) AHIMA Recommended Records Retention Standards University Policy	Office of Legal Services	LEG-14

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Radiological Films, Scans, and Other Image Records</b>	12 years from date of last patient encounter.  Any signed narrative reports, interpretations, or sample tracings generated to report results must be maintained as part of the Medical Record.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	Relevant Health Care Center or Clinic	HCLNIC-22
<b>Student Health Insurance Waivers:</b> Signed waiver indicating student's acceptance or waiver of University student health insurance.	Until individual separates from the University.	University Policy	HPD Clinical Operations	HCLNIC-23
<b>Student Health Records</b>	12 years from date of last encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) University Policy	HPD Clinical Operations	HCLNIC-24
<b>Tissue Samples/Remnants</b>	Remnants of tissue shall be preserved for pathology examination until a diagnosis is made on the specimen.	42 C.F.R. § 493.1105(a)(7)(iii)	Relevant Health/Mental Health Care Center or Clinic	HCLNIC-25
<b>P2. <u>HIPAA PRIVACY &amp; SECURITY COMPLIANCE</u></b>  Unless otherwise noted, the Record category source document is the American Health Information Management Association Health Provider Document Retention Schedule and 45 C.F.R. § 164.316. The recommended retention period is based upon 45 C.F.R. § 164.316 (Document Retention Req. = 6 years from the date of creation); <i>see also</i> 64 Fed. Reg. 59918, 59994.				
<b>NSU Hybrid Entity Designation</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.105(c)(1) C.F.R. § 164.105(c)(2) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-1
<b>HIPAA Privacy and Security Policies and Procedures</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.316(b) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

<b>RECORD CATEGORY</b>	<b>RETENTION PERIOD</b>	<b>REFERENCE (Where Applicable)</b>	<b>OFFICE OF RECORD</b>	<b>CODE</b>
<b>HIPAA Privacy and Security Officer and Privacy/Security Liaison Designations (Responsible for Receiving and Processing Requests for Access, Amendments, and Accounting of Disclosures)</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308(a)(2) 45 C.F.R. § 164.530(a) 45 C.F.R. § 164.530(j) 45 C.F.R. § 164.524(e) 45 C.F.R. § 164.526(f) 45 C.F.R. § 164.528(d)	NSU Privacy Officer	HPRIV-3
<b>HIPAA Privacy and Security Training Records, including Need to Know and Confidentiality Agreements</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b) 45 C.F.R. § 164.530(b) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-4
<b>Documentation of Sanctions Taken Against Employees for Violation of HIPAA and/or HIPAA Policies and Procedures</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b) 45 C.F.R. § 164.530(e) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-5
<b>Complaint Records (HIPAA)</b>	10 years after last action.	45 C.F.R. § 164.530(d) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-6
<b>Notice of Privacy Practices</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.520(e) 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-7
<b>Acknowledgment of Receipt of Notice of Privacy Practices</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.520(e) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-17
<b>Good Faith Effort Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.520(e) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-18
<b>HIPAA Authorization for Use or Disclosure of Information for Educational and Related Purposes</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.508(b)(6) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-19

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

<b>RECORD CATEGORY</b>	<b>RETENTION PERIOD</b>	<b>REFERENCE (Where Applicable)</b>	<b>OFFICE OF RECORD</b>	<b>CODE</b>
<b>HIPAA Authorization for Audio/Visual Recording and Observation for Supervisory Purposes</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.508(b)(6) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-20
<b>HIPAA Authorization for Use or Disclosure of Information/Release Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.508(b)(6) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-21
<b>Accounting of Disclosures Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.528(d) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-22
<b>Internal Patient Restrictions on Use and Disclosure Tracking Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.522(a) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-23
<b>Internal Patient Alternative Method of Communication Tracking Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.522(b) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-24
<b>Denial of Access to Protected Health Information Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.524(d) & (e) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-25
<b>Denial of Request to Amend Protected Health Information</b>	Six years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.526(d) & (f) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-26
<b>Documentation of Patient Complaints</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract,	45 C.F.R. § 164.530(d)(2) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component and	HCLNIC-27 HPRIV-8

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	whichever is later.		NSU Privacy	
<b>Affidavit of Relationship</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-28
<b>HIPAA Authorization for Disclosure of Information in Connection with Deceased Individuals</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.502(f) 45 C.F.R. § 164.508(b)(6) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-29
<b>Request for Amendment of the Protected Health Information Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.526(f) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-30
<b>Approved Amendment of Protected Health Information Form</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.526(f) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-31
<b>Business Associate Agreement</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.504(e) 45 C.F.R. § 164.530(j)	All NSU HIPAA-Covered Healthcare Component	HCLNIC-32
<b>HIPAA Research Study Documents, including, but not limited to:</b> <ul style="list-style-type: none"> <li>Accounting of Disclosures Form for Research</li> <li>NSU Authorization for Use and Disclosure of PHI in Research</li> <li>IRB Waiver Request Form</li> <li>IRB Research on Decedent's Information Without Authorization Form</li> <li>IRB Review Preparatory to Research Forms</li> <li>42 C.F.R. Part 2 Addendum Form</li> <li>HIV Records Addendum Form</li> <li>Mental Health Addendum Form</li> </ul>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.  To be maintained in the patient's research chart and/or research section of the patient chart.	45 C.F.R. § 164.508(b)(6) 45 C.F.R. § 164.512(i) 45 C.F.R. § 164.530(j)	Principal Investigator	GRSP-13

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*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Electronic Security "Audit Trail" Records:</b> Includes documentation of audit trail reviews, including random and selective/focused audits.	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.  "Audit Logs" will be retained for a time period sufficient to allow for periodic review.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-5
<b>Copies of or Other Records of Security Reminders</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-3
<b>HIPAA-Related Security Incident Reports and Investigations</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.  A copy of any HIPAA-related security incident report or investigation shall be provided to the NSU Privacy Officer.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-25
<b>Security Risk Analysis and Documentation of Periodic Evaluation</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-19
<b>Inventory of all Hardware, Software and Information Systems and Locations</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.310 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-8
<b>List of all Users with Access to NSU information Systems and Level of Privileges</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-9

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Network Maintenance Logs</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.310 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-11
<b>Documentation of Backup Procedures, Schedules and Periodic Testing of Backup/Recovery Procedures</b>	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.308 45 C.F.R. § 164.316(b)	Information Security Officer	OIIT-4
<b>Breach Notification Investigation and Related Records:</b> This Record Set includes breach notification investigation records, breach notification risk assessment, individual notice(s), HHS notice(s) and media notice(s) (if applicable).	6 years from the date of its creation, the date when it last was in effect, or in accordance with governing contract, whichever is later.	45 C.F.R. § 164.414 45 C.F.R. § 164.530(j)	NSU Privacy Officer	HPRIV-9
<b>P3. <u>OIG-GSA EXCLUSION SCREENINGS</u></b>				
<b>Documentation of Screening for Excluded Individuals:</b> OIG documentation for individuals who have been excluded from participating in Medicare, Medicaid, and/or any other Federal Healthcare Program.	6 years from the date of termination of employment.	42 C.F.R. § 1003.132	Relevant Health Care Clinic	HCLNIC-33
<b>P4. <u>CLINICAL TRIALS</u></b>  Clinical trial documentation within the Medical Record will be managed in accordance with the retention standards set forth for Medical Records or in accordance with contract/grant stipulations, whichever is longer.  For all other Records pertaining to clinical trial research activities, the appropriate mandatory requirements as set forth under <b>Grants, Contracts and Research</b> , above, shall be followed.				
<b>Q. <u>PAYROLL RECORDS</u></b>				
<b>Authorization Record for Reimbursements of Employee Overpayments</b>	Active + 3 years.	29 C.F.R. §§ 516.2-516.8 University Policy	Payroll Department	PAY-4
<b>Changes in Human Resources / Payroll-Related Data:</b> Includes documentation regarding new hires, terminations, changes in salaries and pay rates, and voluntary payroll deductions.	7 years.	5 C.F.R. 630.1211 20 C.F.R. 825.500 29 C.F.R. §§ 516.2-516.8 29 C.F.R. § 1627.3(a) Florida General Records	Office of Human Resources	PAY-5 OHR-43

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
		Schedule GS1-SL NSU Accounting & Financial Policies & Procedures Manual, § 125.1		
<b>Federal and State Payroll Related Tax Forms/Reports</b>	Active + 7 years.	5 C.F.R. 630.1211 20 C.F.R. 825.500 29 C.F.R. §§ 516.2-516.8 29 C.F.R. § 1627.3(a) Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Payroll Department	PAY-6
<b>Garnishment Documentation:</b> Contains copies of court orders, pertinent employee data, computation data, employee acknowledgment forms, IRS notices of levy, and correspondence regarding employee garnishment cases.	Active + 7 years.	NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Payroll Department	PAY-7
<b>Overtime Documentation:</b> Includes overtime authorizations.	7 years.	29 C.F.R. §§ 516.2-516.8 University Policy	Payroll Department	PAY-8
<b>Payroll Records and Employment Tax Records (Social Security Documents):</b> Includes direct deposit forms; payroll deduction authorizations; changes to W-4 forms; supporting documentation for payroll adjustments; documentation for all student hires (SEAF); leave and absentee forms on all employees; changes in income tax withholding status; and court-ordered payroll deductions.	7 years or until audit is complete, whichever is greater.	5 C.F.R. § 630.1211 20 C.F.R. § 825.500 29 C.F.R. §§ 516.2-516.8 29 C.F.R. § 1627.3(a) Florida General Records Schedule GS1-SL NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Payroll Department	PAY-9
<b>Positions/Job Classification Review File:</b> Includes job classification, FLSA-supporting documents.	Current + 3 years after classification review.	29 U.S.C. § 255	Office of Human Resources	OHR-7
<b>Time and Attendance Records:</b> Includes documents signed by the employee and his/her supervisor documenting the number of hours worked in a given week.	7 years.	29 C.F.R. § 516.6 NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Payroll Department	PAY-10

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Unemployment Compensation Files:</b> Consolidated file listing all employees (classified, contract and faculty) for whom an unemployment claim has been filed. This includes copies of claim forms, correspondence, costs for the institution and amount of unemployment compensation paid.	3 fiscal years provided applicable audits have been released.	5 C.F.R. § 630.1211 20 C.F.R. § 825.500 29 C.F.R. §§ 516.2-516.8 29 C.F.R. § 1627.3(a) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-8
<b>Unemployment Insurance Payments</b>	7 years or until audit is complete, whichever is greater.	26 U.S.C. § 3101, <i>et. al.</i> 26 U.S.C. § 3301, <i>et. al.</i> 29 C.F.R. § 31.6001-2 University Policy	Payroll Department	PAY-11
<b>Withholding Tax Statements</b>	7 years.	29 C.F.R. § 31.6001-2 IRS Publication 15 Circular E NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Payroll Department	PAY-12
<b>Work Schedules/Assignments</b>	Current + 3 years.	29 U.S.C. § 255 29 C.F.R. § 516.5	Relevant Academic or Administrative Center	ADM-SP-26
<b>R. <u>PERSONNEL RECORDS</u></b>				
<b>R1. <u>PERSONNEL FILES</u></b>				
The following elements of documentation (if applicable) should be included in an employee/faculty member's personnel Record. This record category is not intended to apply to student employees.				
<b>Compensation/Pay Rate Information:</b> Record of compensation/pay rate for individual employee/faculty member.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 U.S.C. § 211(c) 29 C.F.R. § 516.5 29 C.F.R. § 1627.3(a) University Policy	Office of Human Resources	OHR-9
<b>Conflict of Interest Disclosures and Policy Acknowledgment:</b> This Record series does not include Financial Conflict of Interest disclosures required for Sponsored Programs.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-10
<b>Corrective/Disciplinary Actions:</b> Includes Written Warnings of Substandard Performance; Lists of Probationary Periods.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-11

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Employment Applications (Hired)</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.  Standard applies equally to employment applications submitted electronically.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-12
<b>Employee/Faculty Recognition:</b> Awards, incentives, etc.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-13
<b>Faculty Contract (If any)</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-14
<b>Job Title/Description (Employee and Faculty)</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. § 1627.3(b) University Policy	Office of Human Resources	OHR-15
<b>Licensing and Certification Records (Employee and Faculty):</b> Valid current licenses or credentials required by Federal and State requirements applicable to respective disciplines.	1 calendar year after expiration, revocation, or denial of license provided applicable audits have been released.	Florida General Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-27
<b>Offer Letter (Dated), if applicable</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) University Policy	Office of Human Resources	OHR-16
<b>Performance Evaluations</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-17
<b>Personnel Action Form (PAF):</b> Documenting all changes, including job title, grade, salary, promotions, etc.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-18

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Termination Notice/Letter (Dated)</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) University Policy	Office of Human Resources	OHR-19
<b>Training Certification Records:</b> Record of completion of University or Department-centered training courses. Does not include hazardous material training.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, if later.	29 C.F.R. § 1627.3(b) FLA. STAT. § 95.11(2) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-3
<b>Tuition Waiver Records</b>	5 years from the date of termination of employment or until the conclusion of any legal proceeding, whichever is later.	Florida General Records Schedule GS5 University Policy	Office of Human Resources	OHR-4
<b>R2. <u>OTHER HR FILES</u></b>				
<b>Employee Policy Manual</b>	6 years post-revision, then transfer to University Archives for permanent retention.	29 U.S.C. § 1027 29 U.S.C. § 1113	Office of Human Resources	OHR-20 ARCH-38
<b>Personnel or HR Documentation Furnished upon Request to Auditors from US Department of Labor (or Other Government Agency)</b>	Until audit is completed.	University Policy	Office of Human Resources	OHR-21
<b>R2.1. <u>EMPLOYMENT APPLICANTS</u></b>				
<b>Application and Recruitment Materials for Job Openings and Advertised Positions (Employee):</b> Includes applicant pool; appointment records; notifications of position openings, position descriptions, test forms and scores.	5 years from the date of application or date of advertisement. This retention standard applies to documentation for job applicants that are not interviewed, as well as applicants who are interviewed but are not selected. Standard applies equally to applications submitted electronically.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-22
<b>Applications for Employment (Not Hired):</b> Contains application, correspondence, resumes, etc. from applicants for positions.	5 years from the date of application.  This retention standard applies	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) Florida General Records Schedule GS1-SL	Office of Human Resources	OHR-23

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	to documentation for job applicants that are not interviewed, as well as applicants who are interviewed but are not selected. Standard applies equally to employment applications submitted electronically.	University Policy		
<b>Background Inquiries and Checks/Criminal Records:</b> Includes background screenings completed on employees, vendors and volunteers.	5 years from the date of the results or the conclusion of any proceeding, whichever is later.  Must be kept separate from personnel file.	Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-24
<b>Resumes (Unsolicited)</b>	Retain until obsolete, superseded or administrative value is lost.	Florida General Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-28
<b>Search Committee Files (Executive Level Search):</b> Includes notes, correspondence and other pertinent documentation to Committee actions taken.	5 years from the date of application or date of advertisement.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3(b) Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-25
<b>R2.2. <u>EMPLOYEE BENEFITS</u></b>				
<b>COBRA Required Notices and Related Documentation:</b> Includes notices; any valid documentation or signed acknowledgments that the notices were received by the employee/qualified beneficiary; detailed documentation related to any instance in which COBRA continuation is not offered due to gross misconduct, late notification, Medicare entitlement, etc.; all related correspondence.	6 years from the date of record.	29 U.S.C. § 1027 29 U.S.C. § 1059 29 U.S.C. § 1113	Office of Human Resources	OHR-26
<b>Employee Benefit Files:</b> Includes demographic info, election forms, beneficiary designations, misc. correspondence, and any other information necessary for determining benefits.	Current + 6 years or until the conclusion of any legal proceeding, if later.	29 U.S.C. § 1027 29 U.S.C. § 1059 29 U.S.C. § 1113	Office of Human Resources	OHR-27
<b>Employee Benefit Plan Information:</b> Includes correspondence and information such as pension plans and	Current + 1 year after termination of plan.	29 U.S.C. § 1027 29 U.S.C. § 1059	Office of Human Resources	OHR-28

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
insurance plans available to employees.		29 U.S.C. § 1113 29 C.F.R. § 1627.3(b)(2)		
<b>ERISA Benefit Plan Reports, Disclosures and Other Filings:</b> Summary Annual Report, and Summary Plan Description. Records must include any supporting data and documentation, such as vouchers, worksheets, receipts and applicable resolutions.	6 years after filing date.	29 U.S.C. § 1027 29 U.S.C. § 1059 29 U.S.C. § 1113	Office of Human Resources	OHR-29
<b>ERISA Form 5500</b>	6 years after filing date.	29 U.S.C. § 1027 29 U.S.C. § 1059 29 U.S.C. § 1113	Finance Department	FIN-34
<b>Insurance Records (Employee Benefits):</b> Consists of all policies, applications, correspondence and premium payment records for health, life, or other employee benefits. May also consist of a list of any insurance carriers and the premium payment amounts paid to them.	Permanent.	University Policy	Office of Human Resources	OHR-30
<b>R2.3. EMPLOYEE COMPLAINTS &amp; INVESTIGATIONS</b>				
<b>ADA Grievance Hearings:</b> Includes requests for hearings, grievance hearing records and decisions.	5 years from the date of termination of employment or until conclusion of any proceeding, whichever is later.  <u>Must be kept separate from personnel file.</u>	29 C.F.R. §§ 1602.7-1602.14 University Policy	Office of Human Resources	OHR-31
<b>Complaints (Discrimination, Sexual Harassment, Retaliation):</b> Includes investigation records and findings.	5 years from the date of termination of employment or until conclusion of any proceeding, whichever is later. <u>Must be kept separate from personnel file.</u>	29 C.F.R. §§ 1602.7-1602.14 University Policy	Office of Human Resources	OHR-32
<b>Disciplinary Case Files:</b> Includes documentation of disciplinary cases investigated that allege employee misconduct and/or violations of department regulations and orders, and state/federal statutes. Includes cases that were determined and those not sustained, determined unfounded, or exonerated charges.	5 years from the date of termination of employment or until conclusion of any proceeding, whichever is later.	29 C.F.R. §§ 1602.7-1602.14 University Policy	Office of Human Resources	OHR-33
<b>EEOC Charges of Discrimination and Responses</b>	5 years from the date of	29 C.F.R. §§ 1602.7-1602.14	Office of Human	OHR-34

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	termination of employment or until conclusion of any proceeding, whichever is later.	University Policy	Resources	
<b>Employee and Faculty Grievance Records and Decisions</b>	5 years from the date of termination of employment or until conclusion of any proceeding, whichever is later.	29 C.F.R. §§ 1602.7-1602.14 Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-35
<b>R2.4. EMPLOYMENT-RELATED HEALTH RECORDS</b>				
These Records are not personnel records and must be kept separate from personnel file with access on a need-to-know basis only.				
<b>Blood Borne Pathogen/Asbestos/Mold Exposure:</b> Medical Records of employees known or suspected to have come into contact with blood or other potentially hazardous materials. These Records may include, but are not limited to, the employee's name; social security number; Hepatitis B vaccination status including the dates of testing, results of examinations, medical testing, and follow-up procedures; a copy of the healthcare professional's written opinion; a list of complaints potentially related to the exposure; a copy of information provided to the healthcare professional; and records documenting the exposure or possible exposure of an employee to a blood borne pathogen, contagion, radiation, and chemicals above the acceptable limits or dosage, including statistical analyses, incident reports, material safety data sheets, copies of Medical Records or reports, risk management assessments, and other necessary data to support the possibility of exposure.	Original Records to be retained with Office of Record for 30 days than transferred to Risk Management for 30 years after termination, retirement or separation from employment.	29 C.F.R. § 1910.1001 (Asbestos) 29 C.F.R. § 1910.1020 (Access to Employee Exposure & Medical Records) 29 C.F.R. § 1910.1030 (Bloodborne Pathogens) Florida General Records Schedule GS1-SL	HPD Infection Control Coordinator or Environmental Health Services	HCLNIC-1 EHS-7
<b>Employee Assistance Program Records:</b> Documents related to services received by employees through an employer-sponsored employee assistance program.	5 years after separation.  <u>These Records are not personnel records and must be kept separate from personnel file.</u>	Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-36
<b>Employee Counseling Records:</b> Notes, memoranda, or reports relating to the counseling of an employee for work-related performance problems.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, whichever is later.	Florida General Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-37

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# Records Management & Destruction Policy (Attachment "A")

Record Retention Schedule

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	<u>These Records are not personnel records and must be kept separate from personnel file.</u>			
<b>Employee Disability Accommodation Files:</b> Includes written requests, relevant correspondence and supporting documentation.	Permanent.  <u>These records are not personnel records and must be kept separate from personnel file.</u>	University Policy	Office of Human Resources	OHR-38
<b>FMLA Employee Records:</b> Includes dates of leave/hours of leave; leave requests; employment practices; premium payment; records of dispute; written notice; medical examination records; records of health or disability limitations; release consent forms; return to work forms; short and long-term disability documentation.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, whichever is later.  <u>These records are not personnel records and must be kept separate from personnel file.</u>	29 C.F.R. § 825.500 University Policy	Office of Human Resources	OHR-39
<b>R2.5. IMMIGRATION &amp; NATURALIZATION RECORDS</b>				
<b>Form I-9</b>	3 years from date of hire or one (1) year after termination, whichever is later.	8 U.S.C. § 1324a(b)(3) INA Section 274A(b)(3)	Office of Human Resources	OHR-40
<b>H-1B Visa Documentation:</b> Includes visa application, documentation evidencing wage determinations, and any other pertinent documentation related to the issuance of an H-1B visa.	One (1) year beyond the last date on which any H-1B nonimmigrant is employed under the labor condition application or, if no non-immigrants were employed under the labor condition application, one (1) year from the date the labor condition application expired or was withdrawn.	20 C.F.R. § 655.760(a)-(c)	Office of Human Resources	OHR-41
<b>J-1 Visa Documentation</b>	3 years after termination.	22 C.F.R. § 62.10(h)	Office of Human Resources	OHR-42

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>R3. <u>FACULTY-SPECIFIC RECORDS</u></b>				
<b>Continuing Contract Committee Files:</b> Includes notes, correspondence and other pertinent documentation to Committee actions taken.	5 years if denied continuing contract; otherwise 5 years after termination of employment.	FLA. STAT. § 95.11 University Policy	Relevant Academic or Administrative Center	ADM-SP-29
<b>Continuing Contract Portfolios:</b> Includes documentation submitted by faculty member for the review process; contains forms, letters, and accompanying data.	5 years.	FLA. STAT. § 95.11 University Policy	Relevant Academic or Administrative Center	ADM-SP-30
<b>Faculty Application Files (Non-Hires):</b> Includes any declination letters to individuals who were offered a position and did not accept.	5 years from the date of application.  Standard applies equally to employment applications submitted electronically.	29 C.F.R. § 1627.3 University Policy	Office of Human Resources	OHR-43
<b>Faculty Assignment Reports:</b> Computer-generated reports issued each semester documenting faculty workload in instruction and/or research.	5 years from date report is generated.	University Policy	Relevant Academic Department	ADM-SP-31
<b>Faculty Handbooks</b>	Until superseded by new publication + 6 years, then transfer to University Archives for permanent retention.	29 U.S.C. § 1027 29 U.S.C. § 1059 University Policy	Relevant Academic or Administrative Center	ADM-SP-32 ARCH-39
<b>Faculty Search Committee Files:</b> Records of individuals who applied or interviewed for positions for which a committee was formed. Files contain position authorization forms, job descriptions, search committee minutes, applicant credentials, correspondence, and authorization to hire forms.	5 years after selection is finalized.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3 University Policy	Relevant Academic or Administrative Center	ADM-SP-33
<b>Instructor/ Faculty Evaluations:</b> Completed by students each term.	Current Academic Year + 5 years.	University Policy	Relevant Academic or Administrative Center	ADM-SP-34
<b>Privileging Documents:</b> Records reflecting clinical and preceptor privileges for University faculty.	One (1) calendar year after expiration, revocation, or revision to privileges.	University Policy	Relevant Health Professions Academic Unit	ADM-SP-35

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Promotion Committee Files:</b> Includes notes, correspondence and other pertinent documentation to Committee actions taken.	5 years after termination of employment.	FLA. STAT. § 95.11 29 C.F.R. § 1602.14 29 C.F.R. § 1627.3 Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-SP-36
<b>Promotion Portfolios:</b> Includes documentation submitted by faculty member for the review process; contains forms, letters, and accompanying data.	5 years.  Portfolios should be submitted in an electronic format when possible.  Retain in faculty employee file if promotion is not confirmed.	FLA. STAT. § 95.11 29 C.F.R. § 1602.14 29 C.F.R. § 1627.3 Florida General Records Schedule GS5 University Policy	Relevant Academic or Administrative Center	ADM-SP-37
<b>R4. <u>STUDENT-EMPLOYMENT-SPECIFIC RECORDS</u></b>				
<b>NSU Student-Employment Program Records:</b> Includes position descriptions; job availabilities; applications and other relevant documentation.	5 years after selection is finalized.	29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3 FLA. STAT. § 95.11 University Policy	Office of Student Financial Assistance	SFA-2
<b>Student Employee File:</b> Active and inactive files include student authorization forms, state and federal withholdings, step increases, termination notices, reclassification forms, exemptions, and other relevant documentation.	5 years from the date of termination of employment or until the conclusion of any legal proceeding, whichever is later.	5 C.F.R. § 630.1211 20 C.F.R. § 825.500 29 C.F.R. §§ 516.2-516.8 29 C.F.R. §§ 1602.7-1602.14 29 C.F.R. § 1627.3 FLA. STAT. § 95.11 Florida General Records Schedule GS1-SL University Policy	Office of Student Financial Assistance	SFA-3
<b>S. <u>POST-SECONDARY &amp; GRADUATE ENROLLMENT &amp; STUDENT RECORDS</u></b>				

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>S1. <u>ADMISSION RECORDS</u></b>  Certain information contained within Admission Records is protected confidential information. Destruction of documents must be in compliance with the NSU Records Management & Destruction Policy. Admission Records are <b>not considered a Student Record</b> for purposes of FERPA. FERPA protections begin after an individual has enrolled and become a student of the University.				
<b>Admission Records: Students Denied Admission:</b> Includes correspondence, application, transcripts, equivalency diploma, advanced placement records, entrance examination and placement test reports, residency affidavit, conditional enrollment form, and re-admission forms for students who have been denied admission.	5 years after application submitted or as required by accrediting body, whichever is later.	Florida General Records Schedule GS5 University Policy	Admissions Office	ESS-1
<b>Admission Records: Registered Students:</b> Includes acceptance letters, correspondence, application, transcripts, equivalency diploma, advanced placement records, entrance examination and placement test reports, other test scores, residency affidavit, conditional enrollment form, enrollment verifications and re-admission forms for students who have registered for classes.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 University Policy	Admissions Office	ESS-2
<b>Admission Records: Admitted but Never Registered Students:</b> Includes acceptance letters, correspondence, application, transcripts, equivalency diploma, advanced placement records, entrance examination and placement test reports, residency affidavit, conditional enrollment form, and re-admission forms for students who have not registered for classes.	5 years after application submitted or as required by accrediting body, whichever is later.	University Policy	Admissions Office	ESS-3
<b>Health Records:</b> Related to application for admission to the University.	To be retained consistent with applicable Admission Record category.	University Policy	Admissions Office	ESS-4
<b>International Student Forms:</b> <ul style="list-style-type: none"> <li>▪ Copy of Employment Authorization (if applicable)</li> <li>▪ Copy of Alien Registration Receipt Card (Evidence of Admissibility as an Indefinite Resident)</li> <li>▪ 1-20 (Certificate of Eligibility for F-1 visa)</li> <li>▪ Copy of I-94 Card (Document issued to non-immigrants; AKA Arrival-Departure Record)</li> <li>▪ DS 2019 (Certificate of Eligibility for J-1 Visa)</li> <li>▪ Passport Number</li> </ul>	To be retained consistent with applicable Admission Record category.	University Policy	Office of International Affairs	ESS-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<ul style="list-style-type: none"> <li>Statement of Educational Costs</li> <li>Statement of Financial Responsibility</li> </ul>				
<b>Letters of Recommendation:</b> Letters of reference supporting application to University.	<p>Until admitted.</p> <p>Waivers of rights of access filed with letters of recommendations should be retained as long as the file is retained. Students who revoke their waivers of right of access may not see letters of recommendation submitted during the time the waivers were in force.</p>	University Policy	Admissions Office	ESS-6
<b>Military Records:</b> Veteran's Administration benefits, correspondence; residency; official leave; withdrawals.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	University Policy	Admissions Office	ESS-7
<b>Recruitment Materials (General Student):</b> Includes videos, publications, posters, advertisements, generic letters and other print and web publications related to encouraging potential student(s) to attend the University.	3 years after application term.	University Policy	University Relations	INST-14
<b>Recruitment Materials (Student Specific):</b> Student-specific letters related to encouraging attendance at the University.	3 years after application term.	University Policy	Relevant Academic Center	ADM-SP-38
<b>Residency Classification Forms:</b> Documents supporting determination of legal domicile (residency), including request for Florida residence affidavits.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	University Policy	Relevant HPD Executive Office	ADM-SP-39
<b>TLI and TOEFL Exemptions and Waivers</b>	<p>5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.</p> <p>To be retained as part of the Student's Official Academic Record if admitted.</p>	University Policy	Registrar	ESS-8 STU-1

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>S2. <u>ACADEMIC RECORDS</u></b>				
<b>Applications for Graduation</b>	1 year after graduation or date of last attendance if approved; 5 years after application submitted if denied or pending.  Denied or Pending Applications for Graduation should be maintained with relevant Academic Center.	University Policy	Registrar	ESS-9
<b>Background Screening/Check Results for Clinical Participation</b>	5 years from the date of the results or the conclusion of any proceeding, whichever is later.  Must be kept separate from personnel file.	Florida General Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-40
<b>Clinic/Field Experience/Practicum Evaluations or Reports:</b> Relevant documentation completed by supervising practitioner or preceptor following completion of student rotation, field experience or practice experience at University or off-site clinics.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	University Policy	Relevant Academic Department	ADM-SP-41
<b>Competence Assessments</b>	Permanent.	University Policy	Center for Psychological Studies	ADM-SP-42 STU-2
<b>Continuing Education Student Records:</b> Files for students enrolled in special interest courses and students enrolled in professional certification programs.	Permanent.	University Policy	Relevant Academic Center	ADM-SP-43 STU-3
<b>Credit by Examination Reports/Scores:</b> e.g., Advanced Placement, CLEP, PEP.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-10 STU-4
<b>Curriculum Change Authorizations:</b> Includes class substitutions, waivers, etc.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-11 STU-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
	Denial Records should be retained in the Department's student file per the 5-year Schedule.			
<b>Degree Audit Records:</b> Documents certifying completion of degree requirements; CAP reports.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-12
<b>Examinations for Credit or Proficiency/Placement Examinations:</b> Student responses to placement examinations administered by School, College or Department to determine level of subject knowledge.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 University Policy	Farquhar Testing Center	ADM-SP-44
<b>FERPA Documents</b>	See Sub-Record Category entitled "FERPA."		Registrar	ESS-13
<b>Medical Student Performance Evaluations (MSPE)</b>	Permanent.	University Policy	Relevant Academic Department	ADM-SP-45 STU-6
<b>Name Change Authorizations</b>	Permanent.	University Policy	Registrar	ESS-14 STU-7
<b>Theses and Dissertations (Final)</b>	Permanent.	University Policy	University Archives	ARCH-34
<b>Transcript Requests and Transcript Release Forms</b>	One (1) fiscal year, provided applicable audits have been released.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-15
<b>Transcripts:</b> The Official Student Record documenting courses taken, grades received and degrees awarded.	Permanent.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-16 STU-8
<b>Transfer Credit Evaluations:</b> The underlying equivalency determinations.	Permanent.  Actual transfer credits awarded is reflected on the transcript and is retained as part of the Student's Official Academic Record.	University Policy	Relevant Academic Center	ADM-SP-45

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*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>S3. FERPA-RELATED DOCUMENTS</b>  FERPA specifically requires institutions to maintain Records of requests and disclosures of Personally Identifiable Information, except for defined "directory information" and requests from students for their own Records. The Records of disclosures and requests for disclosures are considered part of the students' Educational Records; therefore, they must be retained as long as the Education Records to which they refer are retained by the institution.				
<b>Formal Hearing Documents:</b> Includes requests for formal hearings.	Permanent.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-16 STU-9
<b>Requests and Disclosures of Personally Identifiable Information</b>	Permanent.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-17 STU-10
<b>Student Request for Nondisclosure of Directory Information</b>	Permanent or until terminated by student.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-18 STU-11
<b>Student Statements on Content of Records Regarding Hearing Panel Decisions</b>	Permanent.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-19 STU-12
<b>Student's Written Consent for Records Disclosure</b>	Permanent or until terminated by student.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-20 STU-13
<b>Waivers for Rights of Access</b>	Permanent or until terminated by student.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-21 STU-14
<b>Written Decision of Hearing Panels</b>	Permanent.	34 C.F.R. § 99, <i>et seq.</i> University Policy	Registrar	ESS-22 STU-15
<b>S4. Administrative Academic Records</b>				
<b>Certification Program Records (Administrative and Departmental)</b>	Retain consistent with applicable Record Category.		Relevant Academic Department	ADM-STU-1 STU-16
<b>Change of Grade Forms (Update Documents)</b>	Permanent.	University Policy	Registrar	ESS-23
<b>Class Roster Rolls:</b> Records include instructor grade reports, grade sheets, and grade changes that are used to create and update the students' transcripts; list of all students enrolled in class during a particular grading period.	Current + 5 years.	Florida General Records Schedule GS5 University Policy	Registrar	ESS-24
<b>Class Schedules (Students):</b> List of classes student took in a given term.	Until end of semester.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-STU-2
<b>Class, Course, Room and Faculty Schedules:</b> Class meeting times and days for each course; room assignments; teaching schedules, including office hours.	Until end of semester.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-STU-3

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Completed Class Tests and Examinations, Students' Course Papers:</b> Includes examination and test questions used to demonstrate student's knowledge of material learned in a particular course and may also include answer keys, test and course paper administrative instructions. This does not apply to class work in possession of a student.	One (1) semester after expiration of appeals process.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-STU-4
<b>Continuing Education Program Records</b>	5 years or as dictated by approval body.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-SP-46
<b>Course Catalogues</b>	Active + 1 year then transfer to University Archives for permanent retention.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-SP-47 ARCH-35
<b>Course, Curriculum, and Program Development:</b> Includes evaluations and improvements of existing courses and programs; design of evaluation instruments to establish bases for improvements as well as the designing of new programs; documents reflecting approval of new programs and degrees.	Retain until obsolete, superseded or administrative value is lost.	Florida General Records Schedule GS5 University Policy	Relevant Academic Department	ADM-SP-48
<b>Credit/No Credit Approvals (Pass/Fair, etc.)</b>	Active + one (1) year, provided grades posted to student record, unless student challenge.	University Policy	Registrar	ESS-25
<b>Departmental Student Academic Files:</b> Files maintained in individual college and department offices on students enrolled in that college or department. Includes students who have graduated, actively enrolled students, and students who are no longer actively enrolled. The Record Set may include grievance or disciplinary actions; logs of conversations; written communications; clinical assessments; and other relevant Records related to the student.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released UNLESS Records are relevant to student professional credentialing/licensing applications, then retain for 75 years after date of last attendance.	University Policy	Relevant Academic Department	ADM-STU-5
<b>Graduate Medical Education (GME) Files:</b> Includes any and all documentation required per any GME Affiliation Agreement entered into on behalf of the University. The material filed in this series can include copies of applications, ECFMG, training agreements, curriculum vitae, evaluations.	10 years after completion of program, withdrawal, or last day of attendance.		Relevant Academic Department	ADM-STU-6

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Graduation Lists</b>	Transfer to University Archives for permanent retention.	University Policy	Registrar	ESS-26 ARCH-36
<b>Hold or Encumbrance Authorizations</b>	Until released.	University Policy	Office of Student Financial Assistance/ Registrar	ESS-27
<b>Incomplete Grade Request</b>	1 year after graduation or date of last attendance.	University Policy	Relevant Academic Department	ADM-STU-7
<b>Pass/Fail Requests</b>	1 year after date submitted.	University Policy	Registrar	ESS-28
<b>Registration/Enrollment Forms</b>	5 fiscal years provided all applicable audits have been released.	Fla. Admin. Code r 6A-14.051 University Policy	Registrar	ESS-29
<b>Schedule of Classes (Institutional):</b> Schedule of classes offered each term by the University.	Transfer to University Archives for permanent retention.	University Policy	Relevant Academic Department	ADM-SP-49
<b><u>S5. STUDENT GRIEVANCES &amp; DISCIPLINARY ACTIONS</u></b>				
<b>Academic Action Authorizations:</b> Documentation identifying academic action to be taken with regard to dismissal, academic probation, etc.	Permanent.	University Policy	Registrar	ESS-30 STU-17
<b>Academic Grievance Files:</b> Includes appeals for grade changes, withdrawal after deadline, refunds, etc.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS5 University Policy	Relevant Academic Center	ADM-STU-7
<b>Grievance Procedure Files (Student Code/University Policy):</b> All nonacademic grievances of policies/procedures that are not governed by a specific academic center, program, college, or school. Does not include complaints or grievances related to allegations of harassment or discrimination.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 FLA. STAT. § 95.11(2) University Policy	Division of Student Affairs	STU-SVCS-1
<b>Harassment or Discrimination Complaint Files (Student):</b> Includes all complaints or grievances related to allegations of harassment or discrimination raised by a student.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	Florida General Records Schedule GS5 FLA. STAT. § 95.11(2) University Policy	Division of Student Affairs	STU-SVCS-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)



RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>S6. STUDENT AFFAIRS &amp; ACADEMIC SERVICES</b>				
<b>Academic Advising Records</b>	5 years after graduation, transfer, withdrawal, or date of last attendance.	FLA. STAT. § 95.11(2) University Policy	Relevant Academic Center	STU-SVCS-3
<b>Academic Probation and Remediation Records</b>	5 years after graduation, transfer, withdrawal, or date of last attendance.	FLA. STAT. § 95.11(2) University Policy	Relevant Academic Center	ADM-STU-8
<b>Alumni Records (Departmental):</b> Includes name change and address change records; biographical updates; record of death; return mail.	Permanent.	University Policy	Relevant Academic Center	ADM-SP-50
<b>Career Development Records:</b> Ongoing development records for current students and University alumni including advisement session records, mock interviews, workshop records.	Retain until obsolete, superseded or administrative value is lost.	University Policy	Division of Student Affairs	STU-SVCS-3
<b>Disability Services and Accommodation Requests (Students):</b> Includes requests, supporting documentation submitted by student, and other related documentation and correspondence.	Permanent. <u>Must be kept separate from academic file.</u>	University Policy	Office of Student Disabilities Services	STU-SVCS-4
<b>Graduate Assistantship Practicum Records:</b> Includes applications and related materials.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	FLA. STAT. § 95.11(2) University Policy	School of Humanities and Social Sciences	STU-SVCS-5
<b>Intramural Sport Records:</b> Includes liability waivers, incident and injury reports.	6 years after end of academic year.	FLA. STAT. § 95.11(2) FLA. STAT. § 95.11(3) University Policy	Office of Campus Recreation	STU-SVCS-6
<b>Learning Disability Testing Records</b>	Permanent.  To be retained consistent with Student Accommodation Records.	FLA. STAT. § 95.11(2) University Policy	Office of Student Disabilities Services	STU-SVCS-7
<b>Room Request/ Space Reservations (Students)</b>	One (1) year.	University Policy	Enrollment & Student Services: Room Scheduling	STU-SVCS-8
<b>Student Action Requests:</b> Written requests for waivers from specific university, college, or school policies under unusual circumstances.	5 years after date of last attendance or as required by accrediting body provided applicable audits have been released, whichever is later.	FLA. STAT. § 95.11(2) University Policy	Relevant Academic or Administrative Center	ADM-STU-9

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Student Events and Activities Board Records</b>	1 year.	University Policy	Office of Student Affairs	STU-SVCS-9
<b>Student Housing Agreements:</b> Includes short-term housing contracts and leases.	5 years after expiration of contract/lease.	FLA. STAT. § 95.11(2) University Policy	Office of Student Affairs	STU-SVCS-10
<b>Student Housing Records:</b> Includes student/critical incident files, related billing records.	Permanent.	University Policy	Division of Student Affairs	STU-SVCS-11
<b>Student Internship Records:</b> This Record Set does not include healthcare-related internships through the Health Professions Division programs or any other healthcare-related internship program.	One (1) year or as required by accrediting body then until obsolete, superseded or administrative value is lost.	University Policy	Office of Career Development	STU-SVCS-12
<b>Student Meal Plan Records:</b> Does not include student-athlete per diem meal plan documentation.	One (1) year.	University Policy	Division of Student Affairs	STU-SVCS-13
<b>Student Mediation Records:</b> Records maintained by student mediation services.	5 years following mediation file closing.	FLA. STAT. § 95.11(2) University Policy	Division of Student Affairs	STU-SVCS-14
<b>Student Organization Records:</b> Minutes, supporting materials, ephemera, and publications of a registered student organization, including, but not limited to, membership rosters, project-related materials, philanthropy records, and teacher-sponsor notes.	One (1) year then retain until obsolete, superseded or administrative value is lost.	University Policy	Division of Student Affairs	STU-SVCS-15
<b>Student Orientation Records</b>	One (1) year then retain until retain until obsolete, superseded or administrative value is lost.	University Policy	Division of Student Affairs or Relevant Academic Center	STU-SVCS-16 ADM-SP-51
<b>Tutoring Service Records</b>	5 years after student no longer utilizing service.	FLA. STAT. § 95.11(2) University Policy	Office of Academic Services or Relevant Academic Center	STU-SVCS-17 ADM-STU-9

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>T. <u>PRE-K, PRIMARY AND SECONDARY SCHOOL-SPECIFIC RECORDS</u></b>  The "Office of Record" identified in this Record category refer to the relevant pre-K, primary or secondary school office, and not the central NSU office, unless otherwise indicated.				
<b>Absentee Excuses and Admission Slips:</b> Notes from parents or guardians concerning excuses and admissions to classes.	Until obsolete, superseded, or administrative value is lost.	Florida General Records Schedule GS7 University Policy	Attendance Office	MSI- 1 USCH-1
<b>Abuse/Neglect Reporting Records:</b> Consists of any written record reporting known or suspected abuse, neglect or abandonment of a child, including but not limited to DC&F reporting forms.	Permanent.  For DC&F reporting, DC&F maintains Record Copy. A copy of the Record shall be maintained with the relevant reporting center.	Florida General Records Schedule GS7 University Policy	Relevant Administrative or Academic Unit	ADM-GEN-6
<b>Administration and Authorization of Medicine/Emergency Treatment:</b> Written authorization from a parent or guardian for school to administer prescription and non-prescription medicine, including name of medication administered and by whom; dosage; child's name; date and time; refusal of a student to take medication; quantity of drugs remaining; and written authorizations for emergency treatment.	12 years from date of last student encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002  31 U.S.C. § 3731(b) Florida General Records Schedule GS7 University Policy	Facility Nurse	MSI-N-1 USCH-N-1
<b>Admission Records:</b> Includes applications; registration and enrollment forms; required authorizations and acknowledgments.	3 years for applicants who do not matriculate; 5 years for students who matriculate.	Florida General Records Schedule GS7 University Policy	Admissions Office	MSI-2 USCH-2
<b>Agreements to Expunge, Delete, or Correct the Student Records:</b> Written agreement between the parent/guardian or adult student and school official attesting that student's cumulative record has been altered.	Permanent.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-3 USCH-3
<b>Athletic Eligibility Records (Upper School):</b> Documentation regarding a student's on-going academic eligibility for participation in athletic competitions; may require teacher to report current grade of student in his/her class.	6 months after the season ends.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-4 USCH-4
<b>Attendance Records (Student)</b>	Active + 5 years provided applicable audits are released and resolved.	Florida General Records Schedule GS7 Fla. Admin. Code r 6A-1.044 University Policy	Attendance Office	MSI-5 USCH-5

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Autism Research and Assessment Records</b>	<b>Federal:</b> 3 years from date of submission of final expenditure report for federal grants and contracts; or in accordance with award stipulations, whichever is longer.  <b>State or Private:</b> 5 years for state or private grants and contracts; or in accordance with award stipulations, whichever is longer.	OMB Circular A-110 2 C.F.R. § 215.53 34 C.F.R. § 74.53 45 C.F.R. § 74.53 45 C.F.R. § 92.42 FLA. STAT. § 95.11 State of Florida Department of State, Division of Library and Information Services	Mailman Segal Institute	MSI-6
<b>Ballots: Student Elections</b>	Until Results Announced.	Florida General Records Schedule GS7 University Policy	Student Affairs	USCH-6
<b>Baudhuin School Records and Documentation:</b> All student records; administrative and operational records other than employee and staff records.	To be retained in accordance with the State of Florida General Records Schedule for Public Schools Pre-K-12 GS7 and any other applicable Record retention policies implemented by the Broward County School Board.	Florida General Records Schedule GS7	Baudhuin School	BSCH-1
<b>Child Study Process:</b> Includes parent-teacher communications; child progress records.	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	FLA. STAT. § 95.11(2)	Mailman Segal Institute	MSI-7
<b>Classroom Observations:</b> Observations for specific purposes, i.e., child study, placement program, or teacher evaluation.	5 years.	FLA. STAT. § 95.11(2)	Relevant Pre-K, Primary or Secondary School	MSI-8 USCH-7
<b>Clinic Log:</b> List of which children enter the clinic, date and time, reason, nurse/parent/staff member on duty, and time departed.	12 years from date of last student encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) Florida General Records Schedule GS7 University Policy	Facility Nurse	MSI-N-2 USCH-N-2

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Course Outlines:</b> May include date of classes to be taught, subject matter and assignments, test dates, paper/project topics and due dates, and the office location and hours of the instructor.	Until obsolete, superseded, or administrative value is lost.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School	MSI-9 USCH-8
<b>Curriculum Files:</b> Curriculum course guides that establish requirements in the various areas of study showing philosophy, scope, approved instructional resources, objectives, methods of evaluation and handbooks.	Until obsolete, superseded, or administrative value is lost.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School Faculty or Staff Member	MSI-10 USCH-9
<b>Developmental Screenings (MSI)</b>	7 years.	FLA. STAT. § 95.11 University Policy	Mailman Segal Institute	MSI-11
<b>Discipline Policy Forms:</b> Parental acknowledgment of discipline policy.	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS7 University Policy	Administration Office	MSI-12 USCH-10
<b>Discipline Records (Major Offense):</b> Files and related materials created in reviewing an adverse action or statement against a student, copy of the proposed adverse action with supporting documents, statements of witnesses, reports and decisions.	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS7 University Policy	Administration Office	MSI-13 USCH-11
<b>Discipline Records (Minor Offense):</b> Files and related materials created in reviewing an adverse action or statement against a student, copy of the proposed adverse action with supporting documents, statements of witnesses, reports and decisions.	Retain until end of relevant Academic School Year or in accordance with Parent/Student Handbook.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-14 USCH-11
<b>Emergency Notification Records:</b> Emergency contacts, names of persons allowed to remove the student from school, and any family code words used to identify persons with permission to remove the child.	Retain until end of relevant Academic School Year.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School	MSI-15 USCH-12
<b>Enrichment Program Records (Pre-School)</b>	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS7 University Policy	Administration Office	MSI-16
<b>Examination Materials (Standardized):</b> Materials necessary to administer standardized examinations and tests including, but not limited to, test answer sheets, exam booklets, directions for administering test, grading scales or keys, and other testing protocols; <u>does not include</u>	5 years post-revision unless a separate document memorializes the changes.  Actual testing materials used	Florida General Records Schedule GS7 University Policy	Relevant Primary or Secondary School	USCH-15

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
psychological testing materials. DOES NOT include student examination results.	are to be retained 1 semester after any appeals process.			
<b>Examination Materials (Standardized Psychoeducational):</b> Materials necessary to administer standardized psychological, social, and educational evaluations and tests to facilitate measuring student's strengths and deficits for educational programming and planning including, but not limited to, test protocols and booklets, student written responses, examiner observations and assessment notes, parent and/or teacher behavior rating scales and test booklets for any standardized tests administered by the school's psychologist, social worker, guidance counselor, speech and language diagnostician, and other educational diagnosticians. DOES NOT include student examination results.	5 years post-revision unless a separate document memorializes the changes.  Actual testing materials used are to be retained one (1) semester after any appeals process.	Florida General Records Schedule GS7 University Policy	Relevant Primary or Secondary School	USCH-16
<b>Examination Results (Standardized):</b> Final results of a student's performance on a standardized test; does not include results of practice tests or psychological testing.	Permanent.	Florida General Records Schedule GS7 University Policy	Relevant Primary or Secondary School	USCH-17
<b>Exceptional Student Education Records:</b> These files may include, but are not limited to: staffing checklists or forms; Individual Education Plans (IEPs); Educational Plans (EPS); Family Support Plans (FSPs); parent invitations to attend IEP meetings; notices of re-evaluation; notice of a diploma option; formal notice of denial (into the program, to initiate formal evaluation, to include a requested component of the IEP ,and to make a program or placement change); case histories showing reasons for student's removal from regular classroom; parent consent form for testing; and evaluation and re-evaluation reports.	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-17 USCH-18
<b>Expulsion Records:</b> Suspension notices stating the reasons therefore, investigative reports, notices of hearing, transcripts, recommendations, and final outcomes.	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-18 USCH-19
<b>Extended Care Program Records (MSI)</b>	5 years after graduation, transfer out of program, refusal of admittance to program or withdrawal.	FLA. STAT. § 95.11(2) Florida General Records Schedule GS7 University Policy	Administration Office	MSI-19

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Field Trip Authorizations:</b> Parental/guardian approval/disapproval to take students on trips; normally includes purpose of trip, date, and destination.	Retain until end of school year.	Florida General Records Schedule GS7	Relevant Primary or Secondary School	USCH-20
<b>Grade Records:</b> Records include teacher grade reports, grade sheets, and grade changes that are used to create and update the students' transcripts; list of all students enrolled in class during a particular grading period.	Current + 5 years.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School Faculty or Staff Member	MSI-21 USCH-21
<b>Health Immunization Notice of Non-Compliance:</b> Letter or notice that informs parents, guardians, or adult students that they are not in compliance with Florida's immunization standards.	Until in compliance.	Florida General Records Schedule GS7	Administration Office	MSI-21 USCH-22
<b>Internship Records (Grades 9-12):</b> Related to placement of high school student as part of the student's educational program.	5 years after graduation, transfer out of program, refusal of admittance to the program, or withdrawal.	Florida General Records Schedule GS7	University School	USCH-23
<b>Lesson Plan Books/Files</b>	Retain until obsolete, superseded, or administrative value is lost.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School Faculty or Staff Member	MSI-22 USCH-24
<b>Parent/Student Handbooks</b>	5 years post-revision unless a separate document memorializes the changes.	FLA. STAT. § 95.11(2) University Policy	Administration Office	MSI-23 USCH-25 ARCH-37
<b>Parent/Teacher Conference Records</b>	Current + 5 years.	FLA. STAT. § 95.11(2) University Policy	Relevant Pre-K, Primary or Secondary School Faculty or Staff Member	MSI-24 USCH-26
<b>Parenting Place Program Records (Mailman-Segal):</b> Includes parent/child class schedules and records; Just for Kids class schedules and records; documentation related to parenting classes and enrichment programs offered through the Parenting Place Program.	Current + 5 years.	FLA. STAT. § 95.11(2) University Policy	Administration Office	MSI-25

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Professional Treatment Records (Health Related):</b> Documented confidential health information that is not part of the student cumulative Record. May include, but is not limited to, authorizations given for prescription medication administration and EpiPen use.	12 years from date of last patient encounter.	FLA. STAT. § 95.11(4)(b) FLA. STAT. § 456.073(13) Fla. Admin. Code r 64B8-10.002 31 U.S.C. § 3731(b) Florida General Records Schedule GS7 University Policy	Facility Nurse	MSI-N-3 USCH-N-3
<b>Release of Information (Generic):</b> Form or Record that authorizes the release of educational information to another party by the parent/guardian or adult student, indicating what records are to be sent and to whom or what institution. This retention period is not applicable to the release of medical or psychological information.	Permanent.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-26 USCH-27
<b>Requests and Disclosures of Personally Identifiable Information</b>	Permanent.	34 C.F.R. § 99.32 Florida General Records Schedule GS7 University Policy	Administration Office	MSI-27 USCH-28
<b>Security Screening Records:</b> Records documenting security screenings conducted on school or contractual personnel.	Permanent.	Florida General Records Schedule GS7 University Policy	Office of Human Resources	OHR-24
<b>Selection Process (Student Achievement and Teacher Awards):</b> Includes award criteria, nomination forms, committee evaluations, vote sheets, applications or nomination supporting documentation, and final decisions.	Current Academic Year.	Florida General Records Schedule GS7 University Policy	Administration Office	MSI-28 USCH-29
<b>Statement of Contest:</b> Statement of a student or parent contesting a school decision regarding part of the student educational record; statement is included in the cumulative record after a hearing.	As long as the Record is maintained.  Maintain the statement with the contested part of the Record.	34 C.F.R. § 99.21 Florida General Records Schedule GS7	Administration Office	USCH-30
<b>Student Class Work Records:</b> Non-standardized tests, term papers, homework, art work, lab projects, and other class work materials in the care of a teacher or other staff	Current Academic Year or after appeal time has expired.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School Faculty or Staff Member	MSI-29 USCH-31
<b>Student Lists:</b> Prepared for various programs and other activities, such as students participating in club meetings, attending an assembly, acting as hall monitors, or out of	Current Academic Year.	Florida General Records Schedule GS7 University Policy	Relevant Pre-K, Primary or Secondary School	MSI-30 USCH-32

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
school on a field trip or team sporting event.			Coordinator	
<b>Summer Camp Records (Pre-School)</b>	Current + 5 years.	FLA. STAT. § 95.11(2) University Policy	Administration Office	MSI-31
<b>Therapeutic and Support Services Programming (Baudhuin School) Records</b>	To be retained in accordance with the State of Florida General Records Schedule for Public Schools Pre-K-12 G87 and any other applicable record retention policies implemented by the Broward County School Board.	Florida General Records Schedule GS7	Baudhuin School	BSCH-2
<b>Vaccination Records</b>	Permanent.	University Policy	Facility Nurse	MSI-32 USCH-33
<b>Visitor Control Registers:</b> Logs, registers or similar records documenting visitors; security clearances.	Permanent.	University Policy	Administration Office	MSI-33 USCH-34
<b>Volunteer Records:</b> Records include security clearances; volunteer qualifications, types of work available, special event programming, and mentor appointments; security clearances.	Permanent.	University Policy	Administration Office	MSI-34 USCH-35
<b>Wait Lists (Enrollment):</b> Includes application forms, personal identifying information and credit card information.	Until no longer needed.	University Policy	Administration Office	MSI-35 USCH-36
<b>U. PURCHASING</b>				
<b>Bid Records: Capital Improvement:</b> Consists of information relative to the processing and letting of capital improvement successful and unsuccessful bids including advertisement. Capital improvements shall mean enhancement to buildings, fixtures and all other improvements to land.	10 fiscal years after award provided applicable audits have been released.	Florida General Records Schedule GS1-SL University Policy	Procurement Management	BSVS-3
<b>Bid Records: Non-Capital Improvement:</b> Consists of information relative to the processing and letting of non-capital improvement successful and unsuccessful bids including advertisement, requests for proposals, technical specifications, invitations to bid, correspondence, bid tabulations and responses.	10 fiscal years after award provided applicable audits have been released.	Florida General Records Schedule GS1-SL University Policy	Procurement Management	BSVS-4
<b>Publication Requisitions</b>	2 years.	University Policy	Publications	BSVS-5
<b>Purchase Order and Requisition Log:</b> Log of outstanding and paid requisitions and purchase orders that	7 years or until audit is complete, whichever is greater.	29 C.F.R. § 516.5 48 C.F.R. § 4.705-1	Procurement	BSVS-6

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RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
are used for cross-reference purposes.		NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Management	
<b>Purchase Orders and Requisitions (Purchasing and Copies)</b>	7 years or until audit is complete, whichever is greater.	29 C.F.R. § 516.5 48 C.F.R. § 4.705-1 NSU Accounting & Financial Policies & Procedures Manual, § 125.1	Procurement Management	BSVS-7
<b>Receiving Reports:</b> Documentation for the receipt of equipment, supplies ordered or services for payment.	7 years or until audit is complete, whichever is greater.	University Policy	Accounts Payable	FIN-33
<b><u>V. RECORDS MANAGEMENT</u></b>				
<b>Destruction Authorizations</b>	Permanent.	University Policy	Records Management	BSVS-8
<b>Imaged or Scanned Records:</b> Does not include Records <u>originally</u> created electronically.	Reference the Specific Document Category and Retention Period.		Relevant Academic or Administrative Center	OIIT-7
<b>Microfilm Documentation File:</b> Documentation may include authority to conduct microfilming, the identity of persons who supervised the imaging process, test and inspection results, arrangement of originals to be microfilmed, determination of documents to be or not to be imaged.	Permanent.	University Policy	Relevant Academic or Administrative Center	ADM-SP-52
<b>Quality Control Procedures:</b> Procedure or a set of steps taken during the scanning or imaging process to ensure legibility and accuracy in scanning or imaging process.	5 years post-revision unless a separate document memorializes the changes.	FLA. STAT. § 95.11(2) University Policy	Relevant Academic or Administrative Center	ADM-SP-23
<b>Record Retention Schedule</b>	5 years post-revision unless a separate document memorializes the changes.	FLA. STAT. § 95.11(2) University Policy	Records Management	BSVS-9
<b>Records Management Plan</b>	5 years post-revision unless a separate document memorializes the changes.	FLA. STAT. § 95.11(2) University Policy	Records Management	BSVS-10
<b>Records Transmittal Forms:</b> Documentation reflecting when records were transferred to off-site storage including the date of transfer and under whose authorization the	Permanent.	University Policy	Relevant Academic or Administrative	BSVS-11

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
transfer was made.			Center	
<b>W. <u>STUDENT FINANCIAL AID (SFA) RECORDS</u></b>  Educational institutions that participate in federal, state, and private programs of low-interest loans to students must retain, for three (3) years after graduation or withdrawal, students' records of academic progress, attendance, and courses studied according the General Education Provisions Act, amended by the Improving America's School Act of 1994 (Public Law 103-382). In the event of an open audit, Records must be retained until all questions are resolved.  Certain information contained within Financial Aid Records may be protected, confidential information. Destruction of documents must be in compliance with the NSU Records Management & Destruction Policy.				
<b>W1. <u>SFA PROGRAM RECORDS</u></b>				
<b>Documentation Supporting the School's Calculation of its Completion/Graduation or Transfer-Out Rate</b>	3 years after last enrollment provided applicable audits have been released.	34 C.F.R. § 668.24(e)	Office of Institutional Effectiveness	INST-EFF-16
<b>Federal Work-Study Administrative Records:</b> Includes award letters, job descriptions, payment records and related correspondence.	3 years from end of award year for which aid was awarded.	34 C.F.R. § 668.24(e) 34 C.F.R. § 675.19(b)(2)	Office of Student Financial Assistance	SFA-4
<b>Federal Work-Study Student Files:</b> Contains application, PERS exemption form, and evaluations of students employed under Work-Study Program.	3 years from end of award year for which aid was awarded.	34 C.F.R. § 668.24(e) 34 C.F.R. § 675.19(b)(2)	Office of Student Financial Assistance	SFA-5
<b>Financial Aid Annual Reports</b>	3 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e)	Office of Student Financial Assistance	SFA-6
<b>Gramm-Leach-Bliley (GLB) Opt-Out Records</b>	Permanent or until terminated by student.	34 C.F.R. § 668.24(e) University Policy	Office of Student Financial Assistance	SFA-7 OIIT-26
<b>Institutional Information:</b> Cost of attendance.	5 years from date of required disclosure (i.e., end of award year).	University Policy	Office of Student Financial Assistance	SFA-8
<b>Institutional Student Information Record (ISIR):</b> An electronic output document transmitted to the schools the student specified on the application and to state agencies that summarizes information submitted on the student's FAFSA and provides the student's Expected Family Contribution (EFC). The ISIR also includes full applicant data, information on eligibility matches, NSLDS financial aid history, comments, assumptions, and reject reasons.	3 years after last enrollment provided applicable audits have been released.	34 C.F.R. § 668.24(e)	Office of Student Financial Assistance	SFA-9

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Non-Recipient Files:</b> ISIR for students who did not receive aid or enter the University or College.	1 year.	University Policy	Office of Student Financial Assistance	SFA-10
<b>Program Participation Agreements:</b> Includes reports and forms used for University participation in the SFA program.	5 years.	FLA. STAT. § 95.11(2) American Association of Collegiate Registrars and Admissions Officers ("AACRAO") Guide for Retention and Disposal of Student Records University Policy	Office of Student Financial Assistance	SFA-11
<b>Scholarship and Grant Award Files:</b> Includes applications and awards given, including any rosters and reports.	5 fiscal years after award paid out provided applicable audits have been released.	34 C.F.R. § 668.24(e) Florida General Records Schedule GS5 University Policy	Office of Student Financial Assistance	SFA-12
<b>Student Aid Report:</b> A federal "output" document sent directly to a student from ED's Central Processing System that summarizes information submitted on the student's FAFSA and provides the student's Expected Family Contribution (EFC). The SAR is either a paper document mailed to the student or a Web document that can be accessed via a secure link the student receives through e-mail.	5 years after last enrollment provided applicable audits have been released.	34 C.F.R. § 668.24(e) Florida General Records Schedule GS5 University Policy	Office of Student Financial Assistance	SFA-13
<b>Tuition and Fee Schedules</b>	Current + 5 years.	Florida General Records Schedule GS5 University Policy	Office of University Bursar	BUR-2
<b>Veterans Administration Educational Assistance Records</b>	3 years after last enrollment provided applicable audits have been released.	38 C.F.R. § 21.4209(f) Florida General Records Schedule GS5 University Policy	Office of Student Financial Assistance	SFA-14
<b>W2. SFA FISCAL RECORDS</b>				
<b>Accrediting and Licensing Agency Review Approvals and Reports</b>	3 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records	State Relations and Licensure	INST-EFF-17

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
		University Policy		
<b>Audit and Review Reports:</b> Includes any self-evaluation reports.	3 years after completion of audit.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of Student Financial Assistance	SFA-15
<b>Disbursements (Financial Aid)</b>	5 years.	34 C.F.R. § 668.24(e) University Policy	Office of University Bursar	BUR-3
<b>Fiscal Operations Report (FISAP):</b> Reports to federal government on expenditures for federal programs.	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of University Bursar	BUR-4
<b>Perkins Promissory Notes (Original)</b>	Until loan is satisfied or documents are needed to enforce obligation.	AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of University Bursar	BUR-5
<b>Records of Student Accounts</b>	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of University Bursar	BUR-6
<b>Records Supporting Data on Other Required SFA Reports</b>	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of University Bursar	BUR-7
<b>SFA Program Reconciliation Reports</b>	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of Student Financial Assistance	SFA-16
<b>State Grant and Scholarship Award Rosters and Reports</b>	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of Student Financial Assistance	SFA-17

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
<b>Student Accounting Records:</b> Files on individual students' paid and unpaid accounts, including loan applications, correspondence, account activity records, etc.	5 years after graduation, transfer, withdrawal, or date of last attendance.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of Student Financial Assistance	SFA-18
<b>Student Refund and Repayment History</b>	5 years after the end of the award year for which the report was submitted.	34 C.F.R. § 668.24(e) AACRAO Guide for Retention and Disposal of Student Records University Policy	Office of University Bursar	BUR-8
<b>X. UNIVERSITY SUPPORT SERVICES</b>				
<b>Advertising:</b> Ads placed in local and national print media.	5 years, then transfer to University Archives for permanent retention.	University Policy	University Relations	INST-15
<b>Correspondence Tracking Records:</b> Any record created to track any type of incoming and outgoing correspondence or packages by the USPS or by private couriers.	Current Fiscal Year.	Florida Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-54
<b>Equipment Use Request Forms:</b> Includes audio/video and video conferencing requests.	One (1) year after expiration.	Florida Records Schedule GS1-SL University Policy	Office of Information Technology	OIIT-27
<b>Facilities Reservation/Rental Records (Short Term):</b> Includes short-term (1 day – 1 week) reservations at various on-campus locations. Does not include special event use agreements for use of the Rose and Alfred Miniaci Performing Arts Center; the Museum of Art; University Center and Arena; and other on-campus athletic facilities (extended use).	One (1) year after completion or termination of contract.	Florida Records Schedule GS1-SL University Policy	Facilities Management/ Business Services	FMGT-14 BSVS-12
<b>Lab Request Forms (Medical/Science Labs)</b>	One (1) year after expiration.	Florida Records Schedule GS5 University Policy	Environmental Health Services	EHS-11
<b>Lab Request Forms (Microlabs):</b> Includes BANNER Class and student Educational Center lab requests.	One (1) year after expiration.	Florida Records Schedule GS5 University Policy	Enrollment and Student Services	ESS-31
<b>Mail: Undeliverable First Class:</b> Mail returned due to insufficient postage or an incorrect address of the intended person.	One (1) year after returned undeliverable.	Florida Records Schedule GS1-SL University Policy	Relevant Academic or Administrative	ADM-SP-55

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**Records Management & Destruction Policy (Attachment "A")**

*Record Retention Schedule*

(Last Revised: June 30, 2014)

RECORD CATEGORY	RETENTION PERIOD	REFERENCE (Where Applicable)	OFFICE OF RECORD	CODE
			Center	
<b>Mailing and Telecommunication Listings:</b> Any mailing address, telephone or fax number, or e-mail address records maintained on employees or on entities or persons served.	Retain until obsolete, superseded, or administrative value is lost.	Florida Records Schedule GS1-SL University Policy	Office of Human Resources	OHR-44
<b>Permits: Mail Service:</b> Record series consists of bulk mailing permits.	Current Fiscal Year.	Florida Records Schedule GS1-SL University Policy	Office of Business Services	BSVS-13
<b>Photocopier and Telefax Use Logs and Reports</b>	Current Fiscal Year.  Any Records related to sponsored program costs shall be maintained by Principal Investigator in program file.	Florida Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-SP-56
<b>Postage Records:</b> Records and reports of postage expenses, including postage meter use.	Current Fiscal Year.  Any Records related to sponsored program costs shall be maintained by Principal Investigator in program file.	Florida Records Schedule GS1-SL University Policy	Office of Business Services	BSVS-14
<b>Receipts: Registered and Certified Mail</b>	One (1) fiscal year.	Florida Records Schedule GS1-SL University Policy	Relevant Academic or Administrative Center	ADM-GEN-15
<b>Requests for Corporate Credit Cards:</b> University-issued cards for travel expenses.	7 years from card cancellation or employee termination, whichever occurs first.	University Policy	Office of Business Services	BSVS-15
<b>Telecommunication Billing Detail:</b> Itemized monthly listing charges for telephone calls made by departments.	Current Fiscal Year.  Sponsored Program Records shall be maintained by Principal Investigator in program file.	Florida Records Schedule GS1-SL University Policy	Accounts Payable	FIN-34
<b>Telephone Log: Long Distance</b>	Current Fiscal Year.  Sponsored Program Records shall be maintained by Principal Investigator in program file.	Florida Records Schedule GS1-SL University Policy	Accounts Payable	FIN-35

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Section 1 – NSU Requestor Information			
Date:	Name and Title of Department Designee:		NSU Phone Number:
NSU Account Number/Index: (six digits)	Center/Department/Clinic:	Division:	NSU Email Address:
Center/Department Location: (Campus, Building Name, Address, Floor and Room #)			Location of Records: (Campus location /Off-site Facility)
Section 2 - Destruction Request			
Select location of Records and complete the number of Boxes and/or Records. <input type="checkbox"/> Destroy On-site Records <input type="checkbox"/> Destroy Off-site Records			Type of Record <input type="checkbox"/> Physical Records / Paper <input type="checkbox"/> Electronic Records <input type="checkbox"/> Other _____
Number of Boxes:	Number of Files:	Total Inventory Pages:	
Inventory Lists			
Please attach the corresponding NSU Records Inventory List for the box and/or file level as appropriate for all General and Administrative Records. Complete each box on the inventory list. For the destruction of Records containing Protected Health Information and/or Medical Business Office/Billing Records please complete the NSU Medical Records Billing and Inventory List (Attachment "C") to the NSU Records Management and Destruction Policy.			
Section 3 - Certification Statement and Authorization for Destruction:			
I have reviewed the Records listed on the attached Records Inventory List and found them to be obsolete in accordance with the NSU Records Retention Schedule. I certify that the Records are accurately represented, the retention period has been satisfied and to the best of my knowledge that further retention is <u>not required</u> due to any current or pending litigation, investigation, audit or other proceeding. I understand that Records must be destroyed in accordance with the NSU Records Management and Destruction Policy.			
Date:	Signature of Department Designee:		Typed Name for Signature:
Date:	Signature of Department Head: (if required by Senior Administrator)		Typed Name for Signature:
Date:	Signature of Division/College Senior Administrator (i.e., Dean, VP, ED):		Typed Name for Signature:
<b>PLEASE RETURN COMPLETED FORM TO THE NSU RECORDS MANAGER FOR REVIEW AND APPROVAL.</b> Located on Main Campus - Interoffice Mail Code: BSV			
Approval of Destruction Request			
Date:	Signature Vice President for Business Services:		Typed Name for Signature:
Date:	Signature Records Manager:		Typed Name for Signature:
These Records were destroyed on:			
Date:	Signature Records Manager or Employee Supervising On-Site Destruction:		



NSU RECORDS INVENTORY LIST – BOX LEVEL

Please complete the information for each Box to be destroyed. All Fields must be completed for each box. Please format dates as MM/DD/YY.								
Box Number Barcode	Record Category	Record Code	Box Title	Brief Description	Date Range MM/DD/YY – MM/DD/YY		Trigger Date MM/DD/YY	Review Date MM/DD/YY
12345678 -EXAMPLE-	L3. Budget Records -EXAMPLE-	FIN-13 -EXAMPLE-	FY13 Invoices -EXAMPLE-	Vendors A-G -EXAMPLE-	07/01/2012 -EXAMPLE-	06/30/2013 -EXAMPLE-	06/30/2013 -EXAMPLE-	6/30/2020 -EXAMPLE-





**Please complete the detailed information for each file to be destroyed. All Fields must be completed for each box. Please format dates as MM/DD/YY.**

ATTACHMENT B

## NSU MEDICAL RECORDS AND MEDICAL BILLING INVENTORY LIST – BOX LEVEL

Page \_\_\_\_ of \_\_\_\_

Please complete the information for each Box. All Fields must be completed for each box. Please format dates as MM/DD/YY.

Box Number Barcode	Record Category	Record Code	Patient Name	Date of Birth MM/DD/YY	Medical Record Number	Date Range MM/DD/YY – MM/DD/YY		Trigger Date MM/DD/YY	Review Date MM/DD/YY
12345678 -EXAMPLE-	P1. Clinic Records Medical Records -EXAMPLE-	HCLNIC-7 -EXAMPLE-	Last Name First Name -EXAMPLE-	09/07/1984 -EXAMPLE-	12345678 -EXAMPLE-	01/05/2009 -EXAMPLE-	05/01/2013 -EXAMPLE-	05/01/2013 -EXAMPLE-	6/30/2025 -EXAMPLE- Last visit 2013 +12 years



NSU MEDICAL RECORDS AND MEDICAL BILLING INVENTORY LIST – FILE LEVEL

Please complete the information for each Box to be destroyed. All Fields must be completed for each box. Please format dates as MM/DD/YY.								
Box Number Barcode	Record Category	Record Code	Box Title	Brief Description	Date Range MM/DD/YY – MM/DD/YY		Trigger Date MM/DD/YY	Review Date MM/DD/YY
12345678 -EXAMPLE-	P1. CLINIC RECORDS -EXAMPLE-	HCLINIC-1 -EXAMPLE-	FY13 EOB - 1 -EXAMPLE-	EXPLANATION OF BENEFITS -EXAMPLE-	07/01/2012 -EXAMPLE-	06/30/2013 -EXAMPLE-	06/30/2013 -EXAMPLE-	6/30/2025 -EXAMPLE-



NOVA SOUTHEASTERN  
UNIVERSITY

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