ADMINISTRATIVE POLICY

Policy Title	Record Retention Policy
Responsible Executive(s) (RE)	**Sr. VP and COO, Patrick Norton**
Responsible Office(s) (RO)	**Enterprise Risk Services**
Primary Point of Contact from RO	Click or tap here to enter text.
Contact Information (email and phone)	**oirm@tulane.edu 504-865-5653**
Date Proposed	**1/17/25**
Reviewed	**2/23/26**
Last Updated	**2/23/26**
Effective Date	**10/16/26**

☒Permanent ☐Temporary

1.0 POLICY STATEMENT

The Tulane University Records Retention Policy (hereafter "the Policy") establishes uniform standards for the retention and disposition of university Records.

2.0 PURPOSE AND SCOPE

The Policy establishes uniform standards for the retention and disposition of university Records. The Policy is intended to facilitate efficient administration of university business, preserve records with enduring historical value, and allow for the destruction of Records at the conclusion of the application Retention Period required by the university.

The University shall convene a Records Retention and Disposal Committee ("Committee") to guide the university in the implementation, monitoring, and periodic view of this Policy and compliance by the University with this Policy. The Committee shall include a chair and shall include representatives from the offices of all affected schools, departments, programs and other areas deemed appropriate by the Committee.

3.0 APPLICABILITY OF THIS POLICY

This Policy applies to all units and employees of the university who create, receive, maintain, control, process, store, or otherwise have access to university Records.

4.0 WEBSITE ADDRESS FOR THIS POLICY

www.policy.tulane.edu

5.0 CONTACTS

Subject	Contact	Telephone	E-mail/Web Address
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.

6.0 CONTENT

1.0 POLICY STATEMENT 1
2.0 PURPOSE AND SCOPE 1
3.0 APPLICABILITY OF THIS POLICY 2
4.0 WEBSITE ADDRESS FOR THIS POLICY 2
5.0 CONTACTS 2
6.0 CONTENT 2
7.0 DEFINITIONS 2
8.0 POLICY AND PROCEDURES 3
8.1 Records Retention Policy 3
8.1.1 Construction 3
8.1.2 Responsible Parties 3
8.1.3 Suspension of Disposition for Legal or Investigative Hold 4
8.1.4 Timing of Disposition 4
8.1.5 Disposition 5
8.1.6 Questions 5
8.2 Record Retention Schedule 5
8.2.1 Triggering Event 5
8.2.2 Retention Beyond Retention Period 5
9.0 CONSEQUENCE OF VIOLATING THE POLICY 6
APPENDIX I 6
APPENDIX II 19

7.0 DEFINITIONS

Confidential Record: The term "Confidential Record" means a Record that contains personally identifiable information or another kind of information the privacy or confidentiality of which is protected by law, university policy, or by a contract to which the university is a party. Confidential Records include, without limitation, records containing education record information protected by

the Family Education Record and Privacy Act of 1974 ("FERPA"), individually identifiable health information protected by the Health Information Portability and Accountability Act of 1996 ("HIPAA"), information protected by 42 CFR Part 2, customer financial information protected by the Gramm-Leach-Bliley Act of 1999, university employment records, records containing information that the university is contractually obligated to treat as confidential, records containing information not available to the public and treated as confidential under any university-wide or unit policy, and any records containing other kinds of information the disclosure of which might reasonably be regarded as a violation of privacy. For clarity, the term "Confidential Record" includes Level 3 (Confidential Data) and Level 4 (Restricted) as described in the University's Data Classification Policy and Data Governance Policy.

Record: The term "Record" means any recorded information in any retrievable medium or format, whether print or electronic (including email), maintained in any location, and created, received, or maintained in connection with university business.

Retention Period: The Term "Retention Period" means the minimum time for which Records must be retained, based on legal, regulatory or other institutional requirements.

8.0 POLICY AND PROCEDURES

8.1 Records Retention Policy

8.1.1 Construction

The Policy must be read in conjunction with the Record Retention Schedule (Appendix I), which establishes Retention Periods. The Policy does not supersede or replace any provision of the University GDPR Privacy Policy, the Health Information Portability and Accessibility Act ("HIPAA") Policy, the Family Educational Rights and Privacy Act ("FERPA") Policy, or the Retention of Research Data Policy. This Policy does not (a) supersede or replace currently existing internal record management policies or practices of any unit, or (b) preclude any unit from adopting internal record management policies and practices, provided that in each case (a) and (b) such policies and practices are both lawful and consistent with this Policy. If an internal unit policy prescribes a period that exceeds the Retention Period established by this Policy, then the longer period shall apply within that unit. In the event of a direct and irreconcilable conflict between this Policy and an internal unit policy or practice, this Policy shall control.

8.1.2 Responsible Parties

Records are the property of the University and not of the officers, faculty members, or employees who create them or to whom they are entrusted. No one person or unit can be directly responsible for all Records. Therefore, every unit managing is responsible for:

- Implementing records management practices consistent with this Policy and other applicable data management policies (e.g., Data Governance Policy, Retention of Research Data Policy).
- Educating employees in the Records management practices.

- Preserving Records as required under this Policy.
- Properly disposing of Records at the end of the applicable Retention Period.
- Protecting Records against misuse, misplacement, damage, destruction, or theft.
- Monitoring compliance with this Policy.

The administrative head of each unit may designate employees under his or her supervision to be responsible for the management of certain Records.

8.1.3 Suspension of Disposition for Legal or Investigative Hold

If the University is involved in or is reasonably anticipated to be involved in a lawsuit, investigation, or audit, then Records related to that matter **must not be deleted, destroyed, changed, damaged or otherwise disposed of**, even if the Retention Period has ended.

OGC will issue a written notice (sometimes called a "litigation hold" or "preservation notice") to pause Record disposal. All employees must follow that notice and keep the Records safe and unchanged until OGC confirms in writing that the hold is lifted and the Records can be disposed of. **University employees must not delete, destroy, change, damage or otherwise dispose of any Records that may relate to a legal matter unless they have written clearance from OGC.**

If an employee learns or believes that the university is or may become involved in a lawsuit, investigation, or audit, then the employee **must immediately notify OGC and the administrative head of the relevant unit**. This includes, but is not limited to, cases where an employee:

- receives a notice of legal action, subpoena, or audit;
- is asked to preserve Records by someone outside OGC;
- receives a letter, email, or other message making a legal complaint or demand; or
- is aware of an event that could lead to legal or regulatory scrutiny.

After you report it, do not delete, destroy, change, damage or otherwise dispose of any related Records until you receive further instructions from OGC.

8.1.4 Timing of Disposition

A Record should be destroyed only when all of the following conditions are met:

- The Retention Period in the Record Retention Schedule (Appendix I) has ended.
- There are no known additional retention requirements imposed by contracts related to the Records. Each unit is encouraged to identify and review any such contracts when considering disposal of Records.
- There is no active or reasonably anticipated lawsuit, investigation, or audit that requires a litigation hold (See Section 8.1.3 above).
- The Record is not needed by the University Archives for historical or research purposes.

If a Record type is not listed in the Schedule, or there is any doubt about how long to keep it, first contact the responsible administrator of the relevant unit, and if unresolved, contact OGC before destruction.

8.1.5 Disposition

"Disposition" means permanently destroying a Record so it cannot be reconstructed, retrieved, or reused.

- Records that are not Confidential Records
  - Paper: recycle or shred.
  - Electronic: delete in coordination with Information Technology (IT); storage media may be overwritten or physically destroyed.

- Confidential Records
  - Paper: securely shred (locked shred bins or approved vendor).
  - Electronic: permanently delete or physically destroy the media using an IT-approved secure-wipe or destruction method.

8.1.6 Questions

Questions about the Policy or Record Retention Schedule (Appendix I) should be directed first to the administrator responsible for the relevant unit, and if unresolved, to OGC. Information Technology assists with the management of electronic Records, including how to permanently dispose of Confidential Records. University Archives assists with the preservation of Records designated for permanent retention and Records determined to have enduring historical value.

8.2 Record Retention Schedule

Prior to consulting the Record Retention Schedule or destroying any Records, please carefully read the above Policy. To ensure compliance with all relevant laws, the Record Retention Schedule is subject to periodic revision.

8.2.1 Triggering Event

For each Record type, the Record Retention Schedule identifies the event that starts the Retention Period. The event is usually the date the Record is created or received, but it may instead be a later milestone such as contract expiration, grant close out, or student graduation. If multiple milestones are listed, the Record Retention Schedule specifies whether the period begins with the earlier or later event, and that instruction controls.

8.2.2 Retention Beyond Retention Period

Records may be retained past the minimum period when they remain administratively useful or when University Archives, after consulting the relevant unit, determines that the Records possess enduring historical value.

9.0 CONSEQUENCE OF VIOLATING THE POLICY

Violation of this Policy may result in disciplinary action, including termination. Unlawful destruction of, or failure to retain, required Records can also expose both the university and the responsible individual to civil or criminal penalties.

APPENDIX I

Record Categories:

I. Administration and Academic Affairs
II. Business and Finance
III. Corporate
IV. Employment
V. Environmental
VI. Healthcare
VII. Public Safety
VIII. Student Records
IX. Research Data
X. Sponsored Contracts and Grants

Administration and Academic Affairs:

Accreditation Records

Description: Records relating to the accreditation of the university and its academic programs, including preliminary and final accreditation reports and supporting documentation, letters of concern, continuous improvement reports, and correspondence with accreditation bodies.
Retention: Permanent
Citation: n/a

Annual Reports

Description: Records of any university-wide or program-specific annual evaluations or institutional effectiveness reports that document progress institutional objectives, including any periodic or summary statistical reports.
Retention: Permanent
Citation: n/a

Awards Records

Description: Records relating to the nomination and selection of faculty, staff, students, alumni, and other persons to receive university-wide awards, such as teaching awards and honorary degrees.
Retention: Permanent
Citation: n/a

Committee Governance

Description: Records relating to the governance of any standing or ad hoc committees, other than those internal to the Tulane Board, including agendas, minutes, and reports
Retention: Permanent
Citation: n/a

Course Records
Description: Records of the university's course offerings, including course catalogs, curriculum change authorizations, course descriptions, course proposals, and approvals from curriculum committees
Retention: Permanent
Citation n/a

Natural Disaster and Other Emergency Records
Description: Records documenting assessment of, planning, preparation, execution, and response to and recovery from natural disasters, fires, riots, and other emergency situations
Retention: 11 years from date of natural disaster or other emergency, unless response ongoing or records have enduring historical value
Citation: n/a

Event Records
Description: Records relating to the use of university facilities and services for on-campus events, including facility reservations records, facilities use agreements, programs, artist performance contracts and riders, and speaker engagement contracts
Retention: Retain all contracts in accordance with the general schedule for university contracts (11 years after termination or expiration); retain all other event records for three years after date of event
Citation: n/a

Graduation Records
Description: Lists of persons upon whom degrees conferred for each term
Retention: Permanent
Citation: n/a

Legal Records
Description: Records of litigation to which Tulane was a party or non-litigation legal matters on which the Office of the General Counsel has consulted, such as contract disputes, investigation, or audits. Records may include subpoenas, preservation notices, court filings, dispositions, correspondence, and research memoranda
Retention: Retain for a minimum of three years following the final resolution of the legal matter; thereafter, retain longer if administratively useful
Citation: n/a

Operational Records
Description: University-wide or departmental operating procedures and protocols
Retention: Retain until superseded

Organizational Charts

Description: Visual summaries of the organizational structure of the university and accompanying explanation, including departmental organization charts
Retention: Permanent
Citation: n/a

University Policies and Handbooks

Description: Written university-wide or departmental policies or handbooks
Retention: Optional
Citation: n/a

Public Statements by President

Description: Public statements from the Tulane president
Retention: Three years from date of statement, or longer if administratively useful
Citation: n/a

Strategic Plans and Mission Statements

Description: Strategic plans and mission statements, including any amendments, revisions, and progress reports
Retention: Permanent
Citation: n/a

U.S. Export Administration Regulations (EAR) Records

Description: Export control documents, including export license applications and issued licenses, Electronic Export Information (EEI) filings in the AES system, shipping and commercial invoices, end-user and end-use certifications, internal control plans, screening logs, and compliance records, written communications with customers and the U.S. Government related to the transaction
Retention: 5 years from the latest of the date of export, the date of reexport or transfer, or the date of any other activity involving the transaction.
Citation: 15 C.F.R. § 762.6

U.S. Office of Foreign Assets Control (OFAC) Transaction Records

Description: Records related to blocked or rejected transaction reports, license applications, and licenses issued by OFAC, communications with OFAC, internal compliance records, banking or transfer documentation, records of due diligence, screening, or matches to the SDN List or other sanctions lists
Retention: 10 years from the date of the transaction or from the date the blocked property is unblocked or transferred.
Citation: 31 CFR § 501.601 – Records and recordkeeping requirements and 31 CFR § 501.602 – Reports to be furnished on demand

Business and Finance:

Accounting Records

Description: Accounting records including general ledgers, invoices purchase orders, quarterly financial reports, accounts payable and receivable, receipts, cancelled checks, and payment schedules
Retention: Seven years from end of fiscal year in which created
Citation: n/a

Annual Budget Records
Description: Records relating to the annual institutional budget, including estimated tuition, gifts, grants, and other revenues and account summary reports
Retention: Permanent for annual operating budget; seven years from end of year in which created for other records
Citation: n/a

Building and Campus Design Records
Description: Building blueprints, building specifications, building designs, campus maps, and campus development plans
Retention: Permanent
Citation: n/a

Contractor Tax Records
Description: Form 1099; Form 940; Form 941
Retention: Seven years from issuance; permanent for From 940 and Form 941
Citation: 26 C.F.R. 31.6001-1; 26 C.F.R. 53.6001-1

Contracts
Description: Contracts and any related records such as waivers, modifications, notices of breach, certificates of insurance, and addenda
Retention: 11 years after termination or expiration of the contract or its most recent extension/renewal (liberative prescriptive period for breach of contract/personal actions + one year)
Citation: La. C.C. art. 3499

Debt Financing Records
Description: Letters of credit, loan agreements, and records relating to bonds and debentures
Retention: Seven years from date record created or satisfaction of debt to which the record relates, whichever occurs later
Citation: 26 C.F.R. 31.6001-1; 26 C.F.R. 301.6501(a)-1

Federal Tax Returns
Description: 990, 990T, and supporting materials
Retention: Permanent for 990 and 990T; seven years after fiscal year in which submitted for supporting materials
Citation: n/a

General Ledgers

Gift Records

Description: Records related to gifts to an endowment or trust, gifts of real/immovable property, including any gift letters, wills or testaments, and other instruments through which gifts were realized

Retention: Permanent

Citation: n/a

Insurance

Description: Insurance policies, endorsements, claims, and related records

Retention: Retain policies and endorsements permanently; retain claims and documents related to claims seven years after final resolution

Citation: n/a

Intellectual Property

Description: Records related to trademarks, copyrights, and other intellectual property rights

Retention: Permanent

Citation: n/a

Tax Exemption Determination Letters

Description: Determinations of tax-exempt status, including IRS determination letters, and application for tax-exempt status (Form 1023)

Retention: Permanent

Citation: n/a

Licenses and Permits

Description: Documents from federal, state, and municipal agencies authorizing the university to engage in certain business activities

Retention: Permanent

Citation: n/a

Mortgage Records

Description: Records of mortgaged property

Retention: Seven years after satisfaction of mortgage

Citation: 26 C.F.R. 1.6001-1(e); 26 C.F.R. 301.6501(a)-1

Real Estate Records

Description: Records related to ownership, possession, or lease of real/immovable property, including options, deeds, titles, plats, leases, sales, and contracts to sell

Retention: Ten years following the university's disposition of the property or termination of the lease, or longer if administratively useful

Citation: n/a

Reports to Tax Agencies

Description: Required reports to federal, state, and municipal tax authorities, such as Forms 720,1065,1096, 1098-T,1099,1042, and 1120 and quarterly reports of gross receipts (if applicable)

Retention: Six years from date of submission
Citation: n/a

Corporate:

Acquisitions, Mergers, and Reorganizations
Description: Records related to acquisitions, mergers, reorganizations, and other events affecting the form of business and business structure of the university
Retention: Permanent
Citation: n/a

Annual Reports to Secretary of State
Description: Annual report delivered to the Secretary of State
Retention: Permanent
Citation: La. R.S. 12:1-1601(7)

Audited annual financial statements
Description: Any annual financial statements, including Federal Awards audit reports that have been subject to audit or review and any records created in connection with the audit or review
Retention: Permanent; supporting documents retained for seven years from date audit concluded
Citation: 26 C.F.R. 301.6501(e)-1

Authorizations to Conduct Business
Description: Authorizations to conduct business in any state other than Louisiana
Retention: Retain until superseded plus five years
Citation: n/a

Articles of Incorporation, Charter, and Bylaws
Description: Articles of Incorporation, Charter, and Bylaws, including any amendments
Retention: Permanent
Citation: n/a

Corporate Governance
Description: Records of the Board of Administrators' actions and any of its standing and ad hoc committees, including resolutions, minutes, reports, and agendas.
Retention: Permanent
Citation: n/a

Corporate Officer Names and Addresses
Description: List of the names and business addresses of all current officers
Retention: Maintained as a current list
Citation: n/a

Employment:

Affirmative Action and Equal Opportunity Compliance

Description: Records relating to compliance with federal guidelines requiring certain parties to federal government contracts to maintain written Affirmative Action and Equal Opportunity compliance programs.

Retention: Permanent

Citation: 41 C.F.R. 60-250.80; 29 C.F.R. 1602.48

Continuation of Insurance Benefits (COBRA) Records

Description: Records of post-employment continuation of benefits and the university's compliance with the Consolidated Omnibus Reconciliation Act of 1986, such as required notices and acknowledgements of receipt

Retention: Seven years from discontinuation of benefits

Citation: 29 C.F.R. 825.500

Deduction Authorization Records

Description: Records documenting employee-authorized deductions from pay checks

Retention: Four years after year in which authorization given

Citation:

EEO-6 Records

Description: Records necessary to complete the EEO-6 report

Retention: Three years

Citation: 29 C.F.R. 1602.48

Employment Applications Records

Description: Applications for employment, employment inquiries, and hiring decisions, including resumes, applications, interview records, background checks, drug test results, driving records, employment verifications, notes, and letters of reference

Retention: Six years from termination of employment for successful applicants; Six years from denial of application for unsuccessful applicants

Citation:

Employee Benefits

Description: Records of employee eligibility and enrollment in benefit programs, including health insurance, dental insurance, and life insurance

Retention: Seven years after discontinuation of benefits

Citation: 29 U.S.C. 1027, 29 U.S.C. 1059

Employee Payroll Records

Description: Records for all employees, whether part-time or full-time, exempt or non-exempt, including name, sex, occupation, salary, job title, salary or rate of pay, additions or deductions from salary or rate of pay, hours worked per week for non-exempt employees, and records of any retroactive wage payments

Retention: Seven years from date of termination of employment

Citation: 29 C.F.R. 516, .5; 29 C.F.R. 1627.3(a); 29 C.F.R. 516.6

Employee Tax Records

Description: Form W-2; Form W-4; records of tax withholdings, and payments to state unemployment fund

Retention: Thirty years from issuance for Form W-2 and Form W-4; seven years from date created for all other records

Citation: 26 C.F.R. 53.6001-1; 26 C.F.R. 301-6501(a)-1

Environmental Health and Safety Training

Description: Records documenting employee completion of environmental health and safety training; training materials used to administer such training

Retention: Duration of employment for records documenting completion of employee health and safety training; for training materials, three years from the date the training occurred

Citation: n/a

Exposure to Hazardous Substances

Description: Records documenting employee exposure to hazardous substances and records of medical examinations and treatments given to employees for exposure

Retention: Thirty years after termination of employment, unless a specific occupational safety and health standard provides a different period of time

Citation: 29 C.F.R. 1910.1020

Family Medical Leave Act (FMLA) and the Uniformed Services Employment and Reemployment Act (USERRA)

Description: Requests for leave under the Family Medical Leave Act (FMLA) and the Uniformed Services Employment and Reemployment Rights Act (USERRA), including dates requested, dates taken, and any notices to employees regarding leave

Retention: Permanent

Citation: 29 C.F.R. 825.500

Garnishment Records

Description: Records documenting court orders to withhold wages from employee pay checks for garnishments, tax levies, and other purposes, including the garnishment petition and garnishment interrogatories

Retention: Five years from date record received or created

Citation:

Immigration and Naturalization Records

Description: I-9's and related records

Retention: The later of three years from the date of hire or one year following separation from employment

Citation: 8 C.F.R. 274a.2

Job Postings

Description: Postings, advertisements, and other public notices of employment opportunities

Retention: Three years from the date of posting

Citation: 41 C.F.R. 60-300.80, -741.80

Occupational Health and Safety (OSHA) and Employee Safety Records

Description: Records documenting compliance with Occupational Safety and Health Administration (OSHA) regulations, including safety and inspection logs and incident reports forms and other records related to employee safety (other than records related to exposure to hazardous substances)

Retention: Five years from the end of the year to which they relate

Citation: 29 C.F.R. 1904.33; 29 C.F.R. 1904.4

Personnel File

Description: Central or intra-departmental records in any format used to determine eligibility for employment, promotion, changes to job title or job description, salary or wage adjustments, discipline, and termination

Retention: Seven years from termination of employment (unless a more specific requirement in this document requires retention for a longer period)

Citation:

Search Records

Description: Records documenting the search process for faculty and staff positions, including candidate applications, candidate lists, candidate evaluations, interview materials, and the minutes, materials, reports, and agendas of search committees

Retention: Seven years from the date search concluded

Citation:

Unemployment Compensation Claims

Description: Records relating to former-employee claims for unemployment compensation benefits, including claims, notices, claim determinations, and appeals from claim determinations

Retention: Five years from claim determination or from date all appeals therefrom resolved

Citation:

Workers' Compensation Claims

Description: Claims for workers' compensation benefits, incident reports, medical evaluations, determinations, appeals, and notices

Retention: Five years from the end of the year to which they relate

Citation:

Environmental:

Asbestos Records

Description: Records related to asbestos hazards, including surveys, monitoring, inspections, correction plans, remediation, and exposure records

Retention: Thirty years following separation from employment for employee exposure records; thirty years from date created for all other records, except that objective data relied on to support an exemption from an asbestos requirement under 29 C.F.R. 1910.1001(d)(2)(iii) shall be retained for the duration of the employer's reliance upon it.

Citation: 29 C.F.R. 1910.1001(m)(1)-(3)

Chemical and Hazardous Waste Records

Description: Records relating to the packing, transport, receipt, inspection, maintenance, and disposal of chemical and hazardous waste; records of personnel training; records of waste determinations

Retention: Three years after materials disposed of, or after accepted by a transporter if shipped off-site

Citation: 40 C.F.R. 262.23(a)(3); 40 C.F.R. 262.40(a); 40 C.F.R. 262.11(f); LAC 33:V.1019.

Radioactive Waste

Description: Records relating to the transport, receipt, transfer, inspection, handling, storage, and disposal of radioactive waste; records of radiation monitoring; records of Nuclear Regulatory Commission licensure and radiation protection programs; records of the Radiation Safety Committee

Retention: Permanent

Citation: 10 C.F.R. 20.2108; 10 C.F.R. 20.2102; 10 C.F.R. 20.2106(f); 10 C.F.R. 30.51(a)(2)-(3); 10 C.F.R. 40.61(a)(2)-(3); 10 C.F.R. Part 20, Appendix G, § 1; 10 C.F.R. 61.80(f); 10 C.F.R. 35.2024; 49 C.F.R. 172.201

Healthcare:

42 CFR Part 2 Records

Description: Any records which:(i) would identify a patient as having or having had a substance use disorder either directly, by reference to publicly available information, or through verification of such identification by another person; and (ii) contain substance use disorder information obtained by a federally assisted substance use disorder program after March 20, 1972 (part 2 program), or contain alcohol use disorder information obtained by a federally assisted alcohol use disorder or substance use disorder program after May 13, 1974 (part 2 program); or if obtained before the pertinent date, is maintained by a part 2 program after that date as part of an ongoing treatment episode which extends past that date; for the purpose of treating a substance use disorder, making a diagnosis for that treatment, or making a referral for that treatment.

Retention: If the Part 2 program discontinues operations or is taken over or acquired by another program, destruction must occur within one year. Otherwise, records are retained in accordance with state law for medical records.

Citation: 42 CFR 2.19.

HIPAA Policies and Procedures

Description: Policies and procedures implemented to comply with the HIPAA Privacy Rule and/or the HIPAA Security Rule

Retention: Six years from the date of creation or date it was last in effect, whichever is later.

Citation: 45 CFR 164.316(b).

HIPAA Actions, Activities and Assessments

Description: Any action, activity or assessment required by the HIPAA Privacy Rule and/or HIPAA Security Rule to be documented, including without limitation, authorizations, HIPAA Notices of Privacy Practices, security system reviews, HIPAA risk assessments, business associate agreements, incident documentation, complaint and resolution documentation, and PHI access logs.
Retention: Six years from the date of creation.
Citation: 45 CFR 164.316(b).

340B Records, Policies and Procedures

Description: Auditable records, policies and procedures relating to the 340B Program, Section 340B of the Public Health Service Act (1992).
Retention: Three years.
Citation: Internal policies.

DEA Records

Description: Inventories and other records required to be kept under 21 CFR 1304.
Retention: Three years.
Citation: 21 CFR 1304.04.

Patient Treatment Records

Description: Maintenance of patient treatment records by health care providers under Louisiana state law.
Retention: Minimum of seven (7) years from date of last treatment of the patient.
Citation: La. R.S. 40:1165.1(A)(3)(a) and internal policies

Public Safety:

Campus Safety Records

Description: Campus safety statistics and supporting records gathered for inclusion in annual reports required under the Clery Act, crime alerts and documents relating to decisions not to issue crime alerts, as provided under the Clery Act, daily crime logs, arrest records, and notices to faculty, staff, and employees of the availability of annual campus safe
Retention: Seven federal award years from the award year in which the record was created
Citation: 20 U.S.C. 1092(f); 34 C.F.R. 668.46; 34 C.F.R. 668.24

Surveillance Records

Description: Routine surveillance audio and video recorded from posted security cameras, audio and video recordings from Tulane University Police Department dashboard and body cameras
Retention: 30 days from date of recording for routine surveillance; 180 days from date of recording, or longer if relevant to an investigation
Citation: n/a

Student Records:

Admissions Records

Description: Submitted academic applications along with supporting documents and any records relating to the review, evaluation, and outcome of the application

Retention: For students who enroll, three years after end of last term in which the student was enrolled; for students who do not enroll, one year after the end of the year in which the application was submitted.

Citation: n/a

Alumni Records

Description: Records created to keep track of alumni information, such as names, degrees, addresses, and employment

Retention: Permanent

Citation: n/a

Departmental Student Records

Description: Student files maintained by schools or departments for administrative purposes

Retention: Five years from date created or most recently updated/amended

Citation: n/a

Dissertations and Theses

Description: Final copies of dissertations and theses required for successful completion of a graduate program

Retention: Permanent

Citation: n/a

F-1 and M-1 Visa Records

Description: Records relating to the enrollment of students through F-1 and M-1 Visas and reports to U.S. Citizenship and Immigration Services ("USCIS") regarding student's departure from the school

Retention: Three years after the student ceases a full course of study or the university denied a student's reinstatement

Citation: 8 C.F.R. 214.3(g)

Family Educational Rights and Privacy Act (FERPA) Records

Description: FERPA disclosure log; directives through which students opt out of the disclosure of directory information

Retention: Permanent

Citation: n/a

J-1 Visa Records

Description: Records relating to exchange students attending the university on J-1 Visas

Retention: Three years from student's last date of attendance

Citation: 22 C.F.R. 62.10(h)

Loan Records: Federal Family Education Loan Program (FFELP) and Direct Loan Program (DLP)

Description: Records relating to the university's and student or parent borrower's eligibility and participation in the Federal Family Education Loan Program (FFELP) or the Direct Loan Program (DLP)
Retention: Three years after the end of the year in which the student last attended
Citation: 34 C.F.R. 668.24

Loan Records: Perkins Loan Management Records

Description: Records relating to the disbursement and repayment of Perkins student loans, including eligibility documentation, promissory notes, and loan agreements
Retention: Three years after repayment if repaid by borrower; five years after repayment if repaid by another party
Citation: 34 C.F.R. 668.24; 34 C.F.R. 674.19

Loan Records: Perkins Loan Repayment Records

Description: Records related to participation in the Perkins Loan program, including repayment records, statements of rights and responsibilities, and cancellation and deferment requests
Retention: Three years after loan assigned to the Department of Education, canceled, or repaid
Citation: 34 C.F.R. 668.24; 34 C.F.R. 674.19(e)

Student Course Work

Description: Papers, exams, and other materials students submit in satisfaction of course requirements
Retention: One year after the end of the course
Citation: n/a

Student Academic Record

Description: Final transcripts, grade changes, grade change forms, and other records reflecting a student's final academic status at the institution
Retention: Permanent
Citation: n/a

Student Life Record

Description: Records related to student conduct, residential life, Title IX-related records and Clery-related records, and Housing records.
Retention: Seven years (Records related to a student's expulsion shall be permanently maintained).
Citation: 34 C.F.R. 106.45(b)(10); 34 C.F.R. § 668.46

Title IV Program Records

Description: Records relating to the university's eligibility to participate in and administration of Title IV/Higher Education Act (HEA) programs, including program participation agreements, program recertification documents, and applications for program funds
Retention: Three years after the end of the year in which funds awarded or reports submitted, whichever occurs later
Citation: 34 C.F.R. 668.24

Research Data:

Please refer to the Retention of Research Data Policy located in appendix II.

Sponsored Contracts and Grants:

Description: Records including documentation supporting project expenditure, in accordance with the sponsors' requirements.
Retention: 11 years
Citation: 2 CFR 200-333

APPENDIX II

Other Relevant Information or Policies

1. Retention of Research Data Policy
2. Data Governance Policy
3. Data Classification Policy