

RECORDS RETENTION POLICY

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For any comments, feedback, or query, please contact: policies@aub.edu.lb.

Last updated on: July 28, 2008

Section 1 - Purpose

To establish the policy for identifying, retaining, storing, protecting, and disposing of the records of the University (AUB), except for the medical records at AUBMC.

AUB requires that records be maintained in a consistent and logical manner and be retained in such manner so that AUB:

1. Meets legal standards for protection, storage, and retrieval, including US federal, state, local agencies, and Lebanese laws.
2. Protects the privacy of its students and employees.
3. Optimizes the use of space and improves operating efficiency.
4. Minimizes the cost of records retention.
5. Identifies and preserves records of archival significance for historical and research purposes. See also the [Archiving Policy](#).
6. Destroys outdated records in a proper manner

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Section 2 - Policy

1. AUB shall maintain complete, accurate, and high quality records. Records are to be retained for the period of their immediate use, unless longer retention is required for historical reference, contractual or legal requirements, or for other purposes as stated in this policy. This policy does not cover the retention of medical records relating to AUBMC and its related facilities.
2. One of the general principles applicable to this policy is that e-mail records retained in electronic/digital form should be kept for the same retention period as the equivalent material in printed form, with due care, however, to the life of electronic preservation. However, the underlying records are not required to be maintained in more than one medium.
3. Retention periods may be changed due to any of the following reasons: government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such notifications or events may change the requirements listed in this policy.
4. Records containing confidential information (non-public information including, but not limited to, names, addresses, social security numbers, bank account numbers, financial or financial aid information, student numbers, etc.).
5. If it has been determined that it is appropriate to dispose of certain records, said records shall be destroyed in one of the following ways:
 - a. Recycle non-confidential paper records.
 - b. Shred or otherwise render unreadable confidential paper records.
 - c. Erase or destroy electronically stored data.

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Section 3 - Definitions

- 1. Permanent retention:** of records is synonymous with archival preservation.
- 2. Current:** is used in this policy to mean "current year or month to-date." Current plus a designated (X) number means records may be discarded "X" number of months or years after the last day of the current month or year. For example, records completed in 2002, with a retention period of current plus seven years may be discarded after 2009, thus in 2010.
- 4. Location of Records:** the location of records is indicated using the following abbreviations:

NYO	AUB's Head Office located at 3 Dag Hammarskjold Plaza, 8th floor New York, New York 10017-2303
Beirut	AUB's Beirut Campus
PBW&T	Counsel to AUB Patterson, Belknap, Webb & Tyler LLP 1133 Avenue of the Americas New York, New York 10036-6710
Colonial Consulting Corporation, Inc.	AUB's investment portfolio custodian company
Abousleiman and Partners11 Law Offices	Place de l'Etoile, 4th Floor Riad El-Solh Sector, Beirut Central District Lebanon
Moghaizel Law Offices	Ashrafieh 5585 Building Pierre Gemayel Avenue P.O. Box 166742 Ashrafieh, Beirut 2066 7113 Lebanon

Where "NYO/Beirut" is indicated as the location of a category of records, it means that relevant records will be found in both places. However, it does not mean that the same records or documents are required to be retained at both locations. Records in the listed category pertaining to activities in New York will be retained in the New York Office, and records pertaining to activities in Beirut will be retained in Beirut. For example, bank statements from New York bank accounts will be kept in the New York Office, while bank statements from Lebanese bank accounts will be retained in Beirut.

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Section 4 - General

Record Identification	Retention Period	Location of Records
Articles of Incorporation	Permanent	NYO
Department of Education Charter	Permanent	NYO and PBW&T
By-laws	Permanent	NYO
IRS determination letters	Permanent	NYO
Trustee appointments	Permanent	NYO, copies to Archives
Agendas for trustees meetings	Permanent	NYO, copies to Archives*
Minutes of trustees meetings	Permanent	NYO, copies to Archives
Minutes of NYO committees meetings	Permanent	NYO, copies to Archives
Minutes of Board of Deans meetings	Permanent	Beirut, copies to Archives
Minutes of University Senate meetings	Permanent	Beirut, copies to Archives,
Minutes of Beirut committees meetings	Refer to <u>Appendix I</u>	
Lebanese registration as an Educational Organization	Permanent	Beirut
Lebanese licenses	Permanent	Beirut

*NOTE – Access to certain documents is restricted, see [Policy on Archiving](#).

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Section 5 - Program and Administrative Files

Record Identification	Retention Period	Location of Records
General correspondence	Permanent except for routine material as listed below*	NYO/Beirut
Attorney opinion letters	Permanent	NYO/Beirut/PBW&T/AA&A
Powers of attorney and Instruments of delegation thereunder	Permanent	NYO/Beirut (PBW&T has some)
Insurance policies	Permanent	NYO/Beirut
Real estate deeds	Permanent	Beirut
Agreements and contracts relating to land issues	Permanent	NYO/Beirut
Investment agreements	7 years	NYO/Beirut
Equipment leases	10 years after expiration or cancellation	NYO/Beirut
Contracts "under seal"***	20 years after expiration or cancellation	NYO/Beirut
Promissory notes signed in presence of attesting witness	20 years after expiration or cancellation	NYO/Beirut
Other agreements and contracts	10 years after expiration or cancellation	NYO/Beirut
Curriculum	Current plus 10 years or permanent	Beirut
Student documents, including course catalogues, handbooks etc.	Permanent	NYO/Beirut, copies to Archives
Development documents, such as brochures	Current plus 7 years	NYO/Beirut, copies to Archives
Solicitations	Current plus 7 years	NYO/Beirut
Donor records, including names of donors and records of particular gifts	Permanent	NYO/Beirut
Tuition and fee charges	2 years after graduation or departure from AUB	NYO/Beirut
Financial Aid Applications	4 years (while the student is at AUB)	Beirut
Student employment agreements and timesheets	2 years after graduation or	NYO/Beirut

	departure from AUB	
Materials related to AID/ASHA grant awards (financial records, supporting documents and all records pertinent to an award, including applications and lenders name and address)	10 years from the date of submission of a final expenditure report	NYO/Beirut
Materials related to NIH grant (financial, programmatic, supporting documents and all other records requested by a grant)	10 years from the date of submission of an annual financial status report	NYO/Beirut
Materials related to NSF grants	3 years from the date of submission of the Final Project Report to the NSF Beirut: 10 years	NYO/Beirut
Building permits	Permanent	NYO/Beirut
Building plans and specifications	Permanent	NYO/Beirut
Occupancy permits	Permanent	NYO/Beirut
Maintenance records	Permanent	NYO/Beirut
Hazardous chemical records	10 years	NYO/Beirut
Litigation records (including claims, court documents and records, deposition transcripts, discovery materials, litigation files)	10 years after finalization	NYO/Beirut/PBW&T/AA&A
Property insurance policies	Permanent	NYO/Beirut
Liability insurance policies	Permanent	NYO/Beirut
Insurance claim documents	Permanent	NYO/Beirut

* The following materials may be discarded at the discretion of the staff:

1. Unimportant letters and notes requiring no acknowledgement or follow-up such as form letters, notes of appreciation, congratulations, letters of transmittal and plans for meetings.
2. Change of address or position notifications.
3. Unsolicited brochures or annual reports received from other parties, newsletters, press releases, or copies of papers or speeches.
4. Invitations to attend and/or participate in meetings, seminars, workshops.
5. Routine responses to inquiries.

** New York law extends the statute of limitations on sealed instruments, i.e., contracts that include words such as "signed as a sealed instrument" or "witness our hands and seals hereto."

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Section 6 - Financial Accounting and Reporting Documents

Record Identification	Retention Period	Location of Records
Annual financial report (audited)	Permanent	NYO/Beirut
Audit reports and correspondence related thereto (IRS/NYS/GOL)	Permanent	NYO/Beirut
Bank agreements	10 years after expiration or cancellation	NYO/Beirut
Bank statements	Beirut: current plus 10 years, NYO: current plus 6 years	NYO/Beirut
Wire transfer records	Beirut: current plus 10	NYO/Beirut
Deposit records	Beirut: current plus 10	NYO/Beirut
Budgets	Current plus 6 years	NYO/Beirut, copies to Archives
Cancelled checks	Beirut: current plus 10 years, NYO: current plus 6 years (checks are retained by the banks in Beirut)	NYO/Beirut
Cash receipts and disbursements	Beirut: current plus 10 years, NYO: current plus 6 years	NYO/Beirut
Invoices (paid)	Beirut: current plus 10 years, NYO: current plus 6 years	NYO/Beirut
Pension plans and all amendments thereto	Permanent	NYO/Beirut, copies to Archives
Retirement plans and all amendments thereto	Permanent	NYO/Beirut, copies to Archives
Reports of retirement plans filed with internal revenue service or U.S. department of labor and back-up materials	6 years after filing date of report	NYO
Files relating to retirement plans (including records regarding years of service, benefits accrued, benefits paid, all election forms and originals of beneficiary designation forms)	Permanent	NYO/Beirut
Other employee benefit plans (including HIP, educational benefits, etc.)	Permanent	NYO/Beirut
Employee earnings records	Permanent	NYO/Beirut
Certified Annual Financial Statements	Permanent	NYO/Beirut

Internal Revenue Service Reports	Permanent	NYO/Beirut
Annual Return (Form 990 and relevant forms in Beirut)	Permanent	NYO
Wage and tax statements (Form W-2 and relevant forms in Beirut)	Current plus 10 years	NYO/Beirut
Statement of miscellaneous income (Form 1099-Misc. and relevant forms in Beirut)	Current plus 10years	NYO/Beirut
Report of Benefit Plans (Form 5500)	Current plus 6 years	NYO
Federal Income Contributions Act (FICA) quarterly reports and background documents (Form 941)	Current plus 4 years after later of due date or date tax paid	NYO/Beirut
Payroll records (name, address, social security number, date of birth, occupation, rate of pay, weekly compensation)	Beirut: current plus 10 years, NYO: current plus 6 years	NYO/Beirut
Records of worker injury or illness	Current plus 18 years* 10 years for Beirut	NYO/Beirut
Purchases orders, completed	Beirut: current plus 10 years, NYO: current plus 6 years	NYO/Beirut
Securities custodial annual reports (year-end) only	Permanent	NYO
Settlement instructions	Current plus 10 years	Custodian keeps copies of instructions received from investment managers (after trade is executed) and monthly position statements
New York State unemployment insurance records	Current plus 3 years	NYO
Trial Balance and General Ledger	Current plus 10 years	NYO/Beirut
Vouchers, numerically filed	Beirut: current plus 10 years, NYO: current plus 1 year	NYO/Beirut

***Only applicable to the New York Office and employees and consultants in that office.**

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Section 7 - Human Resources

Record Identification	Retention Period	Location of Records
Faculty files, including: - letters of appointment - reviews	Permanent Six years after termination of employment	Beirut
Official status records, including: - single official status record - married official status record - marriage certificate - birth certificate - death certificate - divorce certificate - photocopy of ID and/or Passport - work permit - resident's permit	Beirut: 2 years after termination of employment	Beirut
NSSF records, including: - NSSF employment advice - NSSF termination advice - end of service indemnity records - photocopy of NSSF Card - family allowances records - NSSF certificates	Permanent	Beirut
Personnel records, including: - employment applications	Beirut: current plus 10 years, NYO: current plus 6 years after termination of employment	NYO/Beirut

<ul style="list-style-type: none"> - résumés - references - employment contracts - job description - performance appraisals - training - salary history - payroll deductions - attendance, sick, and vacation leave - transfers - personnel actions - disciplinary warnings and actions - layoff or termination - emergency contacts - beneficiary designation - employee medical, health and safety records (including accident reports, employee exposure records, exposed employee medical records, safety records, employee medical complaints, employee injury records) 		
Syndicate agreements	Permanent	Beirut, copies to Archives
Employment applications (not employed), résumés	Current plus 2 years	NYO/Beirut (retained only if AUB is looking to fill position; unsolicited résumés are discarded)

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Section 8 - Intellectual Property

Record Identification	Retention Period	Location of Records
Original patents and trademarks, related documents, work papers, correspondence, memos etc.	Duration of the ownership of the patent or trademark, plus 5 years	NYO/Beirut, copies to Archives
Research and scientific data, including recorded information, regardless of form or medium on which it is recorded	3 years after submission of final report on research project	NYO/Beirut
Royalty records	Current plus 10 years	NYO/Beirut
All copyright permissions for use of others' copyrighted material	Permanent	NYO/Beirut
All permissions to use any photographs, including photos of employees and students	Permanent	NYO/Beirut
All copyright registrations	Permanent	NYO/Beirut copies to archives
Website pages	Permanent	NYO/Beirut
Publishing agreements	Permanent	NYO/Beirut

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