



Document Retention Policy for Parishes

Introduction

From the very beginning, the Catholic Church has greatly esteemed the value of written records, and the history of the Church is attested to in no small measure on account of the Church's diligent record-keeping over the centuries.

As the People of God, the Church maintains not only records of her leadership and institutions but the sacramental history of each member of the Christian faithful. Moreover, in carrying out its mission of evangelization, the Church must engage in the administration of temporal goods. As part of the responsible administration of these goods, those who minister in the Church produce and receive many documents which must be protected with the greatest care.

These principles are reflected in the canon law of the Church, and, accordingly, this Document Retention Policy for Parishes ("Policy") for the Archdiocese of Portland in Oregon ("Archdiocese") further defines which records must be maintained for ecclesiastical, canonical, legal or historical purposes. All parish employees and staff are expected to comply fully with this Policy. It is assumed, however, that the Policy will not cover every record a parish may generate and staff are encouraged to contact the Chancellor's office at 503-233-8322 if they have questions. This policy also does not apply to parish school records which are covered by the records retention policy of the Department of Catholic Schools. For assistance there, contact the schools office at 503-233-8348.

Definition of Records

The word "records" as used in this Policy refers to all recorded information, documents, letters, maps, books, photographs, films, sound recordings, tapes (magnetic and otherwise), electronic data processing records, emails sent and received, recorded voice mails, electronic data banks and other documentary material created, received, maintained or preserved by any department or employee of the Archdiocese in the course of business or ministry or in pursuit of its legal obligations. Records normally maintained by the parish include: 1) sacramental records, 2) administrative records, 3) personnel records, 4) financial records, 5) property records, 6) cemetery records and 7) publications.

Ownership of Records

All records defined above and created or preserved by a parish of the Archdiocese in the course of employment or in the transaction of Archdiocesan business are solely the property of the parish.

Conservation of Records

No records shall be removed, destroyed, transferred, stored, transferred into another media or otherwise disposed of except in compliance with this Policy.

Administration

Administration of this Policy will be the responsibility of the Chancellor, who will publish the exact dates and confirm conformance to this Policy by all parishes. Each parish will designate a person to be responsible for document review, storage and disposal according to the retention schedule. That person will submit a written report of conformance to the Chancellor by December 31 of each year.

Retention Periods

Retention periods stated in this Policy are absolute, except when legally halted by official notice from the Archbishop's Office, the Chancellor or the General Counsel They will follow the schedule attached to this Policy.

Electronic Records

Records generated and/or stored electronically, including emails, are subject to this Policy and retention schedule in the same manner as printed documents. Retention decisions are to be based on the content of the electronic record in the same manner as a printed document. As is the case with all records, they must be accessible and retrievable for the stated retention period.

Adherence to Retention Schedules

Records are to be maintained only for the recommended retention period; documents no longer required for any ministerial, canonical, legal, historical or operational purpose must be disposed of or destroyed.

Annual File Review

If records of different date ranges are stored and interspersed with active files, the person in each parish who is responsible for document retention compliance should undertake an annual review of files to remove and segregate those records that no longer need to be retained under the applicable retention period. Any such records should then be destroyed.

Canon Law

This Policy is intended to complement the law of the Catholic Church, whether promulgated universally or as particular law for the Archdiocese of Portland. There it shall not be construed as contravening canon law in any way.

Sacramental Records

Concerning sacramental records, this Policy is to be interpreted not only in accord with canon law but the policies of the Archdiocese of Portland currently in force and as modified especially the most recent edition of *Parish Sacramental Records: Policies and Procedures*.

Litigation Holds

When litigation, an audit, or investigation occurs or is reasonably anticipated, a written notice (referred to as a "litigation hold notice" or "legal hold") will be issued to employees and staff. All records potentially relevant to the matter must be retained until the litigation hold is terminated. The effect of this notice is to suspend the destruction or alteration of records, electronically-stored information, and other materials identified in the notice. Records relevant to the matter may not be destroyed—even if the retention period in the records retention schedule has expired or expires during the litigation hold—until the action is resolved and a notice terminating the hold has been issued. There are serious legal and employment consequences for individuals who alter or destroy records under a litigation hold or know of a pending issue and do not halt destruction.

Disposal of Expired Records

Annually, each parish of the Archdiocese shall dispose of records whose retention time has expired. Records may be shredded or, if electronic, deleted or destroyed by another approved method.

Storage of Records & Filing Method

All parishes of the Archdiocese are to file and retain documents in a manner that permits ready application of the retention period for particular records. For example, documents or records of a uniform or like type and date range should be stored in boxes bearing a written designation "Destroy After _____ [insert date]."

Each parish is responsible for maintaining its own records. Records may be maintained on-site or stored off-site at a secure location determined by the pastor. The Chancellor, in consultation with the Archbishop's canonical adviser(s) and the General Counsel, is responsible for establishing retention schedules for any records not identified in the Record Retention Schedule (sorted by category and record type). Generally, if two retention times appear to conflict, the longer retention time controls, without prejudice to norms of canon law.

Conversion of Records to Electronic Medium

Paper records may be scanned or otherwise transferred to an electronic medium. When the conversion is complete the paper records will be destroyed.

Authorized Access to Files

The general rule on access to confidential documents is that regardless of where confidential records are located, they may be accessed at any time by the pastor or his delegate. The

Parish lay personnel and medical records will be maintained at the parish by the pastor or his designee. Records other than the general personnel file (such as medical or disability files) will be separately maintained in a confidential and secured manner, separate from general personnel records. Lay personnel records may be accessed only by the pastor or his delegate. An employee may review his/her file upon following the procedures outlined in the Employee Handbook. Financial records may be accessed by the appropriate staff of the parish and any persons granted access by the pastor. The pastor or his delegate may reproduce or verify sacramental records for certain interested parties only in accord with canon law (cf. canons 220, 487 §2, 535, 1539-1546, *inter alia*) and *Parish Sacramental Records: Policies and Procedures*.

Enforcement

The success of this Policy for the parishes lies in uniform and diligent application of its provisions. For this reason, the failure by a staff member to comply with these provisions may subject that staff member to disciplinary action, up to and including termination of employment, where applicable. Any staff member found to have knowingly and intentionally violated this Policy will be subject to serious sanctions.

Criminal Background Check Records

Consistent with the U.S. Conference of Catholic Bishops' Charter for the Protection of Children and Young People, criminal background check records are retained for as long as the individual continues to be associated with any location. Retention according to this schedule is an operational necessity, given that staff members may engage in ministry, work or volunteer at different locations (or may work in one location and volunteer at another). The records will be destroyed when the individual ceases engaging in ministry, being employed or volunteering at any location, and when the individual provides the Archdiocese with notice that he or she no longer intends thereafter to volunteer or work for any location.

Working Documents Not Included in Retention Schedules

Working documents, including drafts, rough notes, revisions and the like are not listed in the Schedules. Working documents may be destroyed once a final work product is produced and there is no longer any reference needed.

RECORD RETENTION GUIDELINES

A. Sacramental Records

Record Type	Retention Period
Baptism Register	Permanent
Confirmation Register	Permanent
First Communion Register	Permanent
Prenuptial Files	Permanent
Marriage Register	Permanent
Duplicates of marriage nullity case files upon completion of case	Permanent
Death Register	Permanent

B. Administrative Records

These records are produced in the course of the management of the affairs of the parish.

Record Type	Retention Period
Abstracts, deeds (property)	Permanent
Annual reports to Chancery	Permanent
Annual reports to the parish	Permanent
Articles of incorporation & bylaws	Permanent
Bequest and estate papers (<i>wills</i>)	Permanent
Census records	Permanent
Contracts, inactive	7 years after end of contract
Correspondence, legal	Permanent
Correspondence, official (<i>Re: parish policies, diocesan directives, etc.</i>)	Permanent
Correspondence, routine	Review/discard annually
Donor lists	Permanent
Endowment decrees	Permanent
Finance Committee minutes (<i>including notes sent to parish council</i>)	Permanent
Historical file (<i>Newspaper clippings, photos, etc. related to parish</i>)	Permanent
Insurance policies	Permanent
Inventories of property & equipment	Permanent
Leases	7 years after expiration

Liturgical minister's schedules (<i>Altar servers, ushers, lectors, etc.</i>)	Retain until superseded
Mass intention books	Permanent
Office files, subject	Retain those documenting parish activities
Parish council constitutions	Retain until superseded
Parish council minutes	Permanent
Parish Organization records (<i>Minutes, correspondence, publications, etc.</i>)	Permanent
Photographs (<i>relating to parish history, clergy, parishioners</i>)	Permanent
Policy statements	Permanent
Religious education reports (<i>for the diocesan offices</i>)	Permanent
Rosters of parishioners	Permanent
Subject files (<i>Correspondence, memos, rules, schedules, etc.</i>)	Review annually; destroy superseded files
Wills, testaments, codicils	Permanent

C. PERSONNEL RECORDS

Personnel records, many of which are stored in personnel files, must be maintained for each active parish employee. These records should include:

- ☐ Employee application
- ☐ Resume
- ☐ Eligibility verification form (I-9); all I-9s must be stored in a separate binder
- ☐ Salary information
- ☐ Sick leave taken and accrued
- ☐ Vacation record
- ☐ Performance evaluations

These records are **confidential** and should be made available only to parish representatives with a legitimate right to know, unless their disclosure is compelled by some legal action. Employees have the right to inspect their own personnel files. The parish, organization or employer has the right to require that the request be in writing and has 45 days to comply with the request.

Several items likely to be in a personnel file are specifically *excluded* from mandatory inspection, such as:

- ☐ investigation of criminal offenses
- ☐ reference letters
- ☐ test documents
- ☐ materials dealing with staff management planning
- ☐ personal information concerning another employee that could, if released, be

an invasion of privacy
 records relating to a pending legal claim that would be discoverable in court.

Personnel Records: Benefits

Record Type	Retention Period
Disability records	Permanent
Pension vesting files	Permanent
Retirement benefits	Permanent
Service records	Permanent

General

Record Type	Retention Period
Permanent earnings and records	7 years after benefit
Termination attendance records	7 years after termination
Employee contracts	7 years after termination
Employee salary schedules	7 years after termination

Health and Safety

Record Type	Retention Period
Accident/injury reports	6 years
Employee medical complaints	6 years
Employee medical records	30 years from termination
Employee time cards/sheets	7 years
Environmental test records/reports	6 years
Hazardous exposure records	30 years
Toxic substance exposure reports	30 years
Workers' compensation records	12 years after injury (filing), death or last compensation payment

Personnel Actions

Record Type	Retention Period
Applications hired/rejected	1 year
Employee evaluations	7 years after termination
Personnel files, terminated	7 years
Termination records	7 years

Salary Administration

Record Type	Retention Period
W-2 forms	4 years from time of filing
W-4 forms	4 years from date of filing
Time cards	7 years from date of filing
Time sheets	7 years from date of filing
1-9 Forms	See form for specific retention instructions

D. FINANCIAL AND ACCOUNTING RECORDS

Record Type	Retention Period
Bank deposits	7 years
Bank statements	7 years
Canceled checks	7 years
Check registers/stubs	7 years

General

Record Type	Retention Period
Audit reports	Permanent
Balance sheets, annual	Permanent
Balance sheets, monthly/quarterly	Destroy after 1 year
Budgets, approved, revised	Permanent
Financial reports, annual	Permanent
Financial reports, monthly	Destroy after 1 year
Financial statements	Permanent
Parishioner contribution envelope/statement	2 years

Investment/Insurance

Record Type	Retention Period
Bonds, canceled	4 years from date of cancellation
Certificates of deposit, canceled	3 years after redemption
Insurance policies/active	Permanent
Insurance policies/canceled	Permanent
Letters of credit	7 years
Mortgage records	7 years

Securities sales	5 years
Stock investment	5 years after sale

Accounting

Record Type	Retention Period
Accounts payable invoices	7 years
Accounts payable ledgers	7 years
Accounts receivable ledgers	7 years
Credit card statements/charge slips	7 years
Invoices & paid bills, major building/construction	Permanent
Invoices & paid bills, general accounts	7 years
Cash books	7 years
Cash journals	7 years
Cash journal, receipts on offerings & pledges	7 years
Receipts	7 years
Mortgage payments	7 years

Financial Records – Continued

Record Type	Retention Period
General ledger/annual	Permanent
Journals, general & specific funds	Permanent
Journal entry sheets	7 years
Ledgers, subsidiary	7 years
Payroll journals	7 years
Payroll registers, summary schedule of earnings, deductions and accrued leave	7 years
Pension records	Permanent
Pledge registers/ledgers	Permanent

Tax Records

Record Type	Retention Period
Employment taxes, contributions and payments, including taxes withheld, FICA	4 years from date of filing
W-2 forms	4 years from date of filing
W-4 forms	4 years from date of filing
Tax exempt certificates, form 990	Permanent

E. PROPERTY RECORDS

Record Type	Retention Period
Architectural records, blue prints, building designs, specification	Permanent
Architectural drawings	Permanent
Deeds files	Permanent
Mortgage documents	Permanent
Property appraisals	Permanent
Real estate surveys/plots, plans	Permanent
Title search papers & certificates	Permanent

F. CEMETERY RECORDS

Record Type	Retention Period
Account cards (<i>record of lot ownership & payments</i>)*	Permanent
Annual report	Permanent
Bank statements	7 years
Board minutes	Permanent
Burial cards (<i>record of internments—name, date of burial, lot number, etc.; arranged alphabetically</i>)	Permanent
Burial record (<i>record of internments—name, date of burial, etc.</i>)*	Permanent
Contracts documenting lot ownership	Permanent
Correspondence	Selective retention (<i>keep if item has historical, legal, fiscal value</i>)
General ledger	Permanent
Lot maps*	Permanent

****Must have duplicate records off site from original records.***

G. Publications

Record Type	Retention Period
Anniversary books	Permanent
Annual reports to the parish	Permanent
Newsletters of the parish or parish-affiliated organizations	Permanent
Other parish-related publications	Permanent
Parish bulletins	Permanent