

## **XVI. Records Retention**

### **Introduction**

A records management and retention policy is an important component of the administration of each diocese. Records are important for sacramental purposes, day-to-day management and administration, when needed for litigation, efficient management of space, etc. Each diocese should review and comply with the retention requirements applicable to that particular jurisdiction and the nature of the diocese's documents.

Many dioceses have developed and implemented such policies after careful thought, analysis and consultation with legal counsel. It is recommended that dioceses that do not have such a policy consult with those that do, particularly in the same province or state. The formulation of a compliant, practical policy should be done in collaboration with diocesan counsel, the Vicar General, CFO, Chancellor and Archivist.

### **Definition of Records**

Records retention policies should include paper records and electronic files, data and e-mails. Such records would likely be included in the following categories:

- Administrative
- Personnel
- Financial
- Legal
- Property
- Cemetery
- Publications
- Sacramental

Within each group, records could be categorized into the respective appropriate retention periods. Records older than the retention period should be destroyed. Those of permanent value should be stored appropriately.

*Confidential* records should be made available only to diocesan/parish representatives with a legitimate right to know, unless their disclosure is compelled by some legal action.

A comprehensive records retention policy should include the following:

1. Complete listing of all types of records and their retention periods.
2. Documentation to be used in storing, including indexing, labeling, pre-determined destruction dates, inventorying, etc.
3. Internal controls over retrieval, returns and destruction, along with appropriate documentation standards.

4. A process and calendar for updating records into and out of storage and destruction at least annually.
5. Security over stored records.
6. Training and education of all staff on the entire policy and the actual processes.

Particular attention should be given to appropriate retention and deletion policies and practices for emails, recorded voice mails, etc. as electronic media, technology and related state and federal laws continue to evolve.

A sample policy from a large diocese is included herein for reference purposes. Please consult local counsel when developing a records retention policy.

**SAMPLE POLICY – *Consult with Legal Counsel***  
Record Management and Retention Policy and Schedule  
Roman Catholic Diocese of XXXX  
[date]

1) Definition of records:

The word “records” 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 XXXX of the Diocese of XXXX in the course of transaction of business or ministry or in pursuit of its legal obligations.

2) Ownership of records:

All records as defined above and created or preserved by a department, ministry or employee of the Diocese of XXXX in the course of employment or in the transaction of Diocesan business are solely the property of the Diocese.

3) Conservation of records:

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

4) Retention periods:

Retention periods in this policy are absolute, except when legally halted by official notice. They are not minimum guidelines. There are no exceptions.

5) Electronic records:

Records generated and/or stored electronically, including emails, are subject to these policies in the same manner as printed documents. Retention decisions will 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.

6) Disposal of Expired Records:

Annually, the second week of [month], each department of the Diocese of XXXX will dispose of records whose retention time has expired. Records may be shredded or, if electronic, deleted or destroyed by another approved method. No exceptions may be made, the retention times are absolute. Arrangements will be made for commercial shredding. A copy of the Certificate of Destruction will be executed and signed by the department head. One copy should be sent to Archives and the other retained by the department.

7) Certification of disposal of expired records:

Each year, by [month] 1, every department head will submit to the Chancellor a letter testifying to the fact that all expired records pertaining to his/her department have been destroyed in accordance with the Record Retention Schedule.

8) Off-Site Storage of Inactive Records:

Records that are generally inactive but must be retained permanently or for a set period of time will be stored off site. Records will be prepared for storage annually during the second week of [month]. Boxes will be provided for the records. Each box will be identified with a label to be provided. A Certificate of Off-Site Storage must be completed in triplicate. One copy should be placed in the storage box. One copy sent to Archives and one copy retained by the department.

9) 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 in accordance with 6) above.

10) Administration:

Administration of the Record Management and Retention Program will be the responsibility of the Chancellor of the Diocese and will be the specific responsibility of the Diocese of XXXX Archivist, who will publish the exact dates and confirm conformance to this policy by all departments. The Archivist will submit a written report of conformance to the Chancellor by [month date] of each year.

11) Changes and implementation:

Changes to this policy or the Record Retention Schedule may be made only with the written approval of the Bishop of XXXX. This policy will become effective

upon approval of the Bishop of XXXX with the first period for record disposal the [month] following promulgation.

## Records Retention Schedule

Record Group	Type of Record	Time	Medium	Retained	Disposal
	<b>Note on Email</b>				
	<i>The fact that a record is electronic or Email should not affect its retention. The schedule to be followed should be determined by the content of the record. For example, an Email about finance matters would follow the schedule for financial records. An Email about Tribunal matters would follow the schedule for Tribunal records. A personal email, or spam would not be a record at all and could be disposed of, etc.</i>				
	<i>Emails may be filed in electronic folders or printed and filed as paper documents based on their content.</i>				
<b>Administrative Records All Departments</b>					
	Administrative Records (correspondence, memoranda, rules and regulations, etc.)				
	a. Records originating in the organization that document policy, procedure, rules or regulations	Permanent	Paper/electronic	On site	
	b. Records that document routine activities	2 years	Paper/electronic	On site	Shred/elec
	Abstracts, deeds (property)	Permanent	Paper	On site	
	Annual Reports to (Status Animarum)	Permanent	Paper	On site	
	Articles of Incorporation (of the church corporation, parish)	Permanent	Paper	On site	
	Bequest and estate papers	Permanent	Paper	On site	
	Bishop's Decrees	Permanent	Paper/electronic	On site	
	Communications from the Bishop regarding the parish	Permanent	Paper/electronic	On site	
	Constitution and Bylaws (Diocesan Agencies)	Until dissolved	Paper	On site	
	Correspondence, legal	Permanent	Paper/electronic	On site	
	Correspondence, official (paper and email) regarding diocesan/parish policies, directives and/or procedures	Permanent	Paper/electronic	On site	
	Correspondence, routine	Biennial review		On site	Shred/elec
	Donor lists	Permanent	Paper/electronic	On site	
	Finance Committee Minutes	Permanent	Paper/electronic	On site	
	Insurance policies	Permanent	Paper	On site	
	Inventories of property and equipment	Permanent	Paper/electronic	On site	
	Leases	Expiration + 7 years	Paper	On site	Shred/elec
	Office files, general	Biennial review	Paper/electronic	On site	Shred/elec
	Diocesan Pastoral Council constitutions	Until superseded	Paper/electronic	On site	Shred/elec
	Diocesan Pastoral Council minutes	Permanent	Paper/electronic	On site	Shred/elec
	Policy statements	Permanent	Paper/electronic	On site	
	Subject files (Memos, rules, schedules, etc.)	Annual review	Paper/electronic	On site	
	Wills, testaments, codicils	Permanent	Paper/electronic	On site	
<b>Archives</b>					
	Parish History Files	Permanent	Paper	On site	
	Deceased Clergy Files	Permanent	Paper	On site	
	Photo Files ( Priests, parishes, institutions, general)	Permanent	Paper/elec	On site	
	Clergy Card Files	Permanent	Paper	On site	
	Clergy Information Files	Permanent			
	Baptism Record Index files	Permanent	Paper/elec/micro	On site	
	Official Catholic Directories	Permanent	Paper	On site	
	Former Bishops's Files	Permanent	Paper	On site	
	Annuario Pontificio Directories	Permanent	Paper	On site	
	Parsh Boundaries Decrees and maps	Permanent	Paper/elec	On site	
	Historical material (Clippings, photos, booklets, etc. related to diocese and parishes)	Permanent	Paper/electronic	On site	

	Diocesan directories ( <i>File copies</i> )	Permanent	Paper/electronic	On site	
	<i>Publications-</i>				
	Diocesan/parish histories	Permanent	Paper/elec	On site	
	Diocesan/parish anniversary books	Permanent	Paper/elec	On site	
	Newslatters ( <i>diocesan, parish, affiliated organizations</i> )	Permanent	Paper/elec	On site	
	Parish directories	Permanent	Paper/elec	On site	
	Parish bulletins	Permanent	Paper/elec	On site	
<b><i>Bishop's Office</i></b>					
	Bishop's calendar	One year	Paper	On Site	Archives
	General Correspondence	Perm → File	Paper	On Site	Archives
	Holy See/Nuncio Correspondence	Perm → File	Paper	On Site	
	Official Diocesan Correspondence	Perm → File	Paper	On Site	
	USCCB Correspondence	Perm → File	Paper	On Site	
<b><i>Catholic Schools Office</i></b>					
<i>General</i>	Standardized Test Results	10 years	Paper	On site/school	Shred
	Curriculum Standards	Until supeceded	Paper/elec	On Site	Shred
	Federal Program Allotments	5 years`	Paper/elec	On Site	Shred
	NCEA Reports	Permanent	Paper	On Site	5 yrs archive
<i>AHERA</i>	School Management Plans	Permanent	Paper	On Site/school	
	Periodic Surv eillance Reports	Permanent	Paper	On Site/school	
	Abatement documents & manifests	Permanent	Paper	On Site/school	
	School Annual Report for Continued Accreditation	Permanent	Paper	On Site/school	
	School Self-Study Document	Permanent	Paper	On Site/school	
	VT Consensus Report/Notification of Status	Permanent	Paper	On Site/school	
	School Required Actions	Permanent	Paper	On Site/school	
	Interim Reports	Permanent	Paper	On Site/school	
	Guide to Quality and Effectiveness Manual	Until supeceded+5 yrs	Paper/elec	On Site/school	Shred
	TCCED Health Manual	Until superceded	Paper/elec	On Site/school	Shred
	Individual Deficiency Removal Plans/Verification	Termination + 5 years	Paper	On Site/school	Shred
<i>Education Personnel</i>	Certificates and Licenses	Termination + 5 years	Paper	On Site/school	Shred
	Employee Service Record including wage & salary	Permanent	Paper/elec	On Site/school	
	Official Teacher Service Record (included above)	Permanent	Paper/elec	On Site/school	
	Employment Applications (Potential Hires)	2 years from receipt	Paper/elec	On Site	Shred/delete
	Official Transcripts	Termination + 5 years	Paper	On Site/school	Shred
	Employment Contracts	Last Effective date+4 yrs	Paper	On Site/school	Shred
	Grievance Records (not EEOC)	2 years	Paper	On Site/school	Shred
	Training and Educational Attainment Records	Termination + 5 years	Paper/elec	On Site/school	Shred

<b><u>Catechetical Services</u></b>					
	Catechetical Student Database	Death of Student	Electronic	On site	Delete
	Contracts with educational institutions	7 years	Paper	On site	Shred
	Course evaluation	3 years	Paper	On site	Shred
	Diocesan Ministry Day Program Booklet	Permanent	Paper	On site	to Archives
	Handbooks and Manuals	3 years	Paper/elec	On site	Shred/delete
	Institutes (Christ the Servant and John Paul II)	Permanent	Paper/elec	On site	to Archives
	Parish Catechetical Profile	5 years	Paper	On site	Shred
	Renew/Why Catholic? Training Material	7 years	Paper/elec	On site	Shred/delete
	TCC-RE Annual Reports	Permanent	Electronic	On site	to Archives
	TCC-RE Diocesan Reports	1 year	Electronic	On site	Delete
	Religious Education Reports ( <i>for diocesan offices</i> )	Permanent	Paper/electronic	On site	
<b><u>Chancellor</u></b>					
	Claimant Files	Permanent	Paper	On site	
	Ordination Records	Permanent	Paper/elec	On site	
	Settlement Files	Permanent	Paper	On site	
	Clergy Assignment Letters	Permanent → priest's file	Paper	On site	
<b><u>Communications</u></b>					
	News Media Clippings	Permanent	Paper/elec	On site	
	Employee Performance Reviews	3 years	Paper	On site	Shred
	Diocesan News Releases	5 years	Electronic	On site	Delete
	Pastoral Center News	Permanent	Electronic	On site	
	Clergy Newsletter	Permanent	Electronic	On site	
<b><u>Business Office</u></b>					
<i>Risk Management</i>	Incident Reports (accidents/injury)	7 years	Paper/elec	On site	Shred/elec
	Employee medical complaints	7 years	Paper/elec	On site	Shred/elec
	Employee medical records	7 years	Paper/elec	On site	Shred/elec
	Environmental test records/reports	Permanent	Paper/elec	On site	
	Hazardous exposure records	Permanent	Paper/elec	On site	
	Toxic Substance exposure reports	Permanent	Paper/elec	On site	
	Workers Compensation Records	12 years	Paper/elec	On site	
<i>Payroll</i>	Permanent earnings and records	Termination + 7 years	Paper/elec	On site	Shred/elec
	Attendance records	Termination + 7 years	Paper/elec	On site	Shred/elec
	Employee contracts	Termination + 7 years	Paper/elec	On site	Shred/elec
	Employee deduction authorization	Termination + 7 years	Paper/elec	On site	Shred/elec
	Employee salary schedules	Termination + 7 years	Paper/elec	On site	Shred/elec
	Labor contracts	Termination + 7 years	Paper/elec	On site	Shred/elec
	W-2 years Forms	Filing + 7 years	Paper/elec	On site	Shred/elec
	W-4 years Forms	Filing + 7 years	Paper/elec	On site	Shred/elec
	Time Cards	Filing + 3 years	Paper/elec	On site	Shred/elec
	Time Records	Filing + 3 years	Paper/elec	On site	Shred/elec



<i>Banking</i>	Bank deposits	7 years	Paper/elec	On site	Shred/elec
	Bank statements	7 years	Paper/elec	On site	Shred/elec
	Cancelled checks	7 years	Paper/elec	On site	Shred/elec
	Check registers/stubs	7 years	Paper/elec	On site	Shred/elec
<i>General</i>	Audit reports	Permanent	Paper/elec	On site	
	Balance sheets, annual	Permanent	Paper/elec	On site	
	Balance sheets, monthly/quarterly	1 year	Paper/elec	On site	Shred/elec
	Budgets, approved, revised	7 years	Paper/elec	On site	Shred/elec
	Financial reports, annual	Permanent	Paper/elec	On site	
	Financial reports, monthly	1 year	Paper/elec	On site	Shred/elec
	Financial statements	Permanent	Paper/elec	On site	
<i>Investment/Ins.</i>	Certificates of deposit, cancelled	Redemption + 3 years	Paper/elec	On site	Shred/elec
	Insurance policies, active	Permanent	Paper/elec	On site	Shred/elec
	Insurance policies, cancelled	Permanent	Paper/elec	On site	Shred/elec
	Mortgage records	Permanent	Paper/elec	On site	Shred/elec
	Letters of credit	7 years	Paper/elec	On site	Shred/elec
	Securities sales	7 years	Paper/elec	On site	Shred/elec
	Stock investment	Sale + 7 years	Paper/elec	On site	Shred/elec
		7 years	Paper/elec	On site	Shred/elec
<i>Accounting</i>	Accounts payable, invoices	7 years	Paper/elec	On site	Shred/elec
	Accounts payable, ledgers	7 years	Paper/elec	On site	Shred/elec
	Accounts receivable, ledgers	7 years	Paper/elec	On site	Shred/elec
	Credit card statements/charge slips	7 years	Paper/elec	On site	Shred/elec
	Invoices and paid bills, major building construction	Permanent	Paper/elec	On site	
	Invoices and paid bills, general accounts	7 years	Paper/elec	On site	Shred/elec
	Cash books	7 years	Paper/elec	On site	Shred/elec
	Cash journals	7 years	Paper/elec	On site	Shred/elec
	Cash journal, receipts on offerings and pledges	7 years	Paper/elec	On site	Shred/elec
	Receipts	7 years	Paper/elec	On site	Shred/elec
	Mortgage payments	7 years	Paper/elec	On site	Shred/elec
	Chart of accounts	7 years	Paper/elec	On site	Shred/elec
<i>Other records</i>	General ledger, annual	Permanent	Paper/elec	On site	
	Journals, general and specific funds	Permanent	Paper/elec	On site	
	Journal entry sheets	7 years	Paper/elec	On site	Shred/elec
	Ledgers, subsidiary	7 years	Paper/elec	On site	Shred/elec
	Payroll journals	7 years	Paper/elec	On site	Shred/elec

	Payroll registers ( <i>summary schedule of earnings, deductions &amp; accrued leave</i> )	7 years	Paper/elec	On site	Shred/elec
	Pension records	Permanent	Paper/elec	On site	Shred/elec
	Pledge registers/ledgers	7 years	Paper/elec	On site	Shred/elec
	Permanently restricted gift documents	Permanent	Paper/elec	On site	
	Temporarily restricted gift documents	7 years after restrictions	Paper/elec	On site	Shred/elec
<i>Tax Records</i>	Employment taxes ( <i>Contributions and payments including withholding &amp; FICA</i> )	file + 7 years	Paper/elec	On site	Shred/e/ec
	W-2 years forms	file + 7 years	Paper/elec	On site	Shred/e/ec
	W-4 years forms	file + 7 years	Paper/elec	On site	Shred/e/ec
	IRS exemption determination letters ( <i>Other than OCD listed organizations</i> )	Permanent	Paper/elec	On site	
	Form 990	Permanent	Paper/elec	On site	
	IRS exemption determination letters ( <i>Income, excise, property, sales, use, etc.</i> )	Permanent	Paper/elec	On site	
<i>Property Records</i>	Architectural records, blueprints, building designs, specifications	Permanent	Paper/elec	On site	
	Architectural drawings	Permanent	Paper/elec	On site	
	Deeds files	Permanent	Paper/elec	On site	
	Mortgage documents	Permanent	Paper/elec	On site	
	Property appraisals	Permanent	Paper/elec	On site	
	Real estate surveys/plots, plans	Permanent	Paper/elec	On site	
	Title search papers and certificates	Permanent	Paper/elec	On site	
<i>Cemetery Records</i>	Account cards ( <i>record of lot ownership and payments</i> )	Permanent	Paper/elec	On site	
	Annual report	Permanent	Paper/elec	On site	
	Bank statements	7 years	Paper/elec	On site	
	Board minutes	Permanent	Paper/elec	On site	
	Burial cards ( <i>record of interred's name, date of burial, etc.</i> )	Permanent	Paper/elec	On site	
	Burial records ( <i>record of interred's name, date of burial, etc.</i> )	Permanent	Paper/elec	On site	
	Contracts documenting lot ownership	Permanent	Paper/elec	On site	
	Correspondence	BANR	Paper/elec	On site	
	General ledger	Permanent	Paper/elec	On site	
	Lot maps	Permanent	Paper/elec	On site	
<b><u>Human Resources</u></b>					
<i>Admin.Records</i>	Employee Policy Manual	Permanent	Paper/elec	On site	
	Job Descriptions	Permanent	Paper/elec	On site	
	Organizational Chart	Permanent	Paper/elec	On site	
	1-9 years Audit	Permanent	Electronic	On site	

<i>Personnel Records</i>	Employee Application	Termination + 4 years	Paper	On site	Shred
	Resume	Termination + 4 years	Paper	On site	Shred
	Employee Contracts/Offer Letters	Termination + 4 years	Paper	On site	Shred
	Salary Information	Termination + 4 years	Paper/elec	On site	Shred
	Attendance Records ( <i>Jury, PTO, STD, LTD, FMLA, Bereavement</i> )	Termination + 4 years	Paper/elec	On site	Shred
	Eligibility Verification Form I-9 years	Termination + 4 years	Paper	On site	Shred
	Performance Reviews	Termination + 4 years	Paper	On site	Shred
	Write Ups	Termination + 4 years	Paper	On site	Shred
	Promotions/Transfers	Termination + 4 years	Paper	On site	
<i>Benefit Records</i>	Open Enrollment	Termination + 4 years	Paper	On site	Shred
	New Hire	Termination + 4 years	Paper	On site	Shred
	Life Event	Termination + 4 years	Paper	On site	Shred
	Cont. of Benefits	Termination + 4 years	Paper	On site	Shred
	Term of Benefits	Termination + 4 years	Paper	On site	Shred
	Disability Records STD/LTD	Termination + 4 years	Paper/elec	On site	Shred
	FMLA	Termination + 4 years	Paper	On site	Shred
	403B Retirement Plan	Termination + 4 years	Paper	On site	Shred
	Life Insurance Policies	Termination + 4 years	Electronic	On site	Shred
	Benefit Plan Description	Rollout + 4 years	Electronic	On site	Delete
	Benefit Plan Annual Reports	6 years	Electronic	On site	Delete
	Personnel File	Termination + 4 years	Paper	On site	Shred
	Rejected Applications/Resumes	1 year	Paper	On site	Shred
<b><i>Pastoral Planning</i></b>					
	Ad Limina Reports (Quinquennial Report)	Permanent	Paper	On site 10 years	Archives
	Annual Vatican Report	Permanent	Paper	On site 10 years	Archives
	Official Catholic Directory Report	Permanent	Paper	On site 10 years	Archives
	May and October Mass Counts	Permanent	Paper	On site 10 years	Archives
	Census records (parish)	Permanent	Paper/electronic	On site 10 years	Archives
<b><i>Safe Environment</i></b>					
	Application	Termination + 7 years	Paper	On site	Shred/elec
	Screening Form	Termination + 7 years	Paper/elec	On site	Shred/elec
	Interviews	Termination + 7 years	Paper	On site	Shred/elec
	References	Termination + 7 years	Paper/elec	On site	Shred/elec
	Criminal Background Check	Termination + 7 years	Paper/elec	On site	Shred/elec
	Training Records	Termination + 7 years	Paper/elec	On site	Shred/elec
	Policy Acknowledgement	Termination + 7 years	Paper/elec	On site	Shred/elec
	Computer/Internet Policy	Termination + 7 years	Paper/elec	On site	Shred/elec

<b><u>Newspaper</u></b>					
	Newspaper back Issues	Permanent	Paper/elec	On site	
	Other newspaper back issues	Permanent	Paper	On site	
	Photos	Permanent	Paper/elec	On site ten years	Archives
	Photos	Permanent	Paper/elec	On site ten years	Archives
	Subscription Database	Permanent	Paper/elec	On site	
	Subscription Database	Permanent	Paper/elec	On site	
	Website	Permanent	Electronic	On site	
	Freelancer Information	Permanent	Electronic	On site	
	Advertising Contracts	Permanent	Paper/elec	On site	
	General Information Files	Permanent	Paper	On site	
<b><u>Tribunal</u></b>					
	Prenuptial Files	6 yrs paper/then electronic	Paper/elec	On site	
	Nullity File Decisions	Permanent	Paper	On site	
	Nullity File Acta (other than decisions)	Permanent	Paper		
<b><u>Vicar for Clergy</u></b>					
	Priests' Personnel Files	Permanent	Paper	On site	
	Deacons' Personnel Files	Permanent	Paper	On site	
	Clergy Rescript Files	Permanent	Paper	On site	
<b><u>Youth Ministry</u></b>					
	Waiver of liability forms	7 years	Paper	On site	Shred
	Medical release forms	7 years	Paper	On site	Shred
	Code of Conduct forms	7 years	Paper	On site	Shred
	Incident report forms	7 years after resolution	Paper	On site	Shred