

Records Retention Policy

I. **Introduction**

The Diocese of Manchester, including all parishes, Catholic schools, and institutions, creates, maintains, and preserves records every day to assist in fulfilling the pastoral mission of the Church in New Hampshire. Records are the principal means of recording the pastoral activity of the Church. Bearing this in mind, the Chancellor has prepared this Records Retention Policy (“Policy”) as a normative guide for diocesan administration staff and church personnel in parishes, schools, and other affiliated entities of the Diocese, in determining the manner and length of time for maintaining records. When indicated, records to be destroyed must be done so in a permanent manner. This Policy describes many types of records, and it is important that those responsible for establishing, maintaining, and preserving records appreciate the importance of all types of records and consistently follow the guidelines.

This records retention policy¹ was created with reference to the 1983 Code of Canon Law, state and federal statutes, and best practices in record retention. The list of Church records included is lengthy, but not definitive. If questions arise regarding records retention issues, please contact the Office of the Chancellor for additional information.

II. **Records Retention Overview**

A. Purpose. This Records Retention Policy defines which records must be retained for ecclesiastical, canonical, legal, or historical purposes, and the retention period for each type of record. Adherence to the established [retention schedule](#) is a priority for the Diocese so that (1) vital records are protected and retained; (2) the Diocese reduces its costs associated with maintaining and storing records; (3) the data management and storage operations are enhanced and more efficient.

B. Scope. All records created, received, used, or maintained by the diocese and its parishes, schools, or institutions are the property of the Diocese of Manchester. This Records Retention Policy applies to all church personnel of the Diocese and all parishes, schools, and institutions of the Diocese of Manchester.

C. Definitions.

1. “Record” is defined as correspondence, documents (digital or printed), or any other media generated, distributed, or maintained by church personnel in the performance of his or her job duties.
2. “Media” is defined as paper, electronic mail, or electronic/digital storage device (e.g., flash memory device, floppy disk, hard disk, CD-ROM, microfilm, or any other similar

¹ Some of the provisions in this policy are drawn from the Diocese of Sacramento, *Document Retention Policy* (June 2009) and the Archdiocese of Milwaukee, *Records Retention Guidelines for Parish Records* (1998).

data storage medium) used to develop, maintain, or transmit church records.

3. "Church personnel" is defined as clergy, religious, seminarians, employees, and volunteers.

D. Diocesan Archives. In the diocesan administration building, there is a permanent archive with three particular sections: general, historical, and confidential. This division of the diocesan archive is delineated in Canons 486-491 of the [1983 Code of Canon Law](#). An inventory of the records kept in each archive will be maintained at all times in the applicable archive. Documents should not be removed from the archives except for brief periods of time. If a document is removed from these archives, a retrieval record (loan authorization) form must be completed by the archivist and maintained to indicate who has accessed the file, the purpose for access, and the dates the file was loaned and returned.

Access to each section of the diocesan archives is governed by church law. Access to certain documents within some sections of the diocesan archives may be limited as necessary to preserve confidentiality, privacy, and/or the integrity of the records.

1. *General Archive* (Canons 486-488): The records pertaining to the general operations of the diocese are maintained in the *general archive*. The diocesan bishop, vicar general, chancellor, archivist, and chancery notaries (secretaries) are provided with access to the *general archives*. Access to other persons in the diocesan *curia* may be granted on a need-to-know basis with permission from the diocesan bishop or the chancellor.
2. *Historical Archive* (Canon 491): The *historical archive* contains records of historical significance to the diocese, parishes, Catholic schools, and institutions. The diocesan bishop, vicar general, chancellor, archivist, and chancery notaries (secretaries) are provided with access to the historical archive. Others may be granted permission from the bishop or the chancellor on a need to know basis or for research purposes.
3. *Confidential Canonical Archive* (*Archivum Secretum*, Canons 489- 90): The *confidential or secret archive* contains files with documents that are of canonical value or great sensitivity and which need to be kept in conditions of maximum care and security in accordance with the [1983 Code of Canon Law](#). Access to the *confidential canonical archive* is limited to those authorized under Canon 490, which provides that only the diocesan bishop and certain other people that he designates (e.g., the vicar general and chancellor) may have access.

III. **Records Retention Policy**

- A. Follow Applicable Retention Schedules:** Records are to be maintained according to the guidelines established in the [Records Retention Schedule](#). Church records older than the retention period should be destroyed in accordance with the destruction directives of this Policy.
- B. Exception— Litigation Hold.** If church personnel believe, or the Diocese informs them, that records are relevant to current civil or canonical litigation or potential civil or canonical litigation, church personnel must preserve those records until the Chancellor of the Diocese, in consultation with canonical and legal counsel, determines that the records are no longer

needed. This exception supersedes any previously or subsequently established destruction schedule for the affected records. If church personnel believe that an exception may apply, or have any question regarding the possible applicability of the exception, church personnel should contact their supervisors or the Chancellor.

C. Destruction of Records. Each department, parish, school, and institution is responsible for the prompt and permanent destruction of all records upon expiration of the scheduled retention period.

1. *Non-confidential documents:* Documents that do not contain any confidential information may be disposed of by recycling or by discarding with other refuse.
2. *Documents bearing confidential information:* Documents that contain any manner of confidential or otherwise private information must be destroyed (shredded) to prevent the danger of confidential information being obtained and misused.

D. Storage and Preservation of Records.

1. *Storage:* Records within the retention period and/or of permanent value should be stored appropriately (e.g., free from damage by insects, climate change, fire, and water). Confidential records and those of permanent value should be stored in a fire resistant and water resistant vault or cabinet that includes a lock, preferably a combination lock that restricts access to authorized personnel. Care should be taken to store records in appropriately labeled files so that they may be located easily in the future. Records of historical value should not be folded as creases may damage the records. When possible, records of historical value should be preserved on archival paper and stored in acid-free folders.
2. *Computer-generated/digital records:* While most church records exist in hard-copy form, computer-generated church records are also of great value. Church records stored in computer databases may include parish membership and giving (donor) records, financial data, ledgers, personnel records, and payroll information. To ensure the safekeeping of computer-generated/digital church records, records must be backed up remotely and regularly. Information stored on the Diocesan Administration's shared file systems are automatically backed up. If require, information falling into the categories described below should be printed when created and at the time of any revision and stored in hard copy (or should be maintained in accordance with the Digital Imaging provision of this Policy) in accordance with the prescribed retention periods.

IV. *Content and Treatment of Specific Types of Files*

A. Records of Clerics and Seminarians.

1. *Location of Records:* Certain records pertaining to seminarians, deacons, and priests incardinated in the Diocese of Manchester and assigned by the diocesan bishop are maintained in vaults in the diocesan administration building. Certain records pertaining to clerics who have been granted faculties by the diocesan bishop are maintained in the upper vault, and medical records and other confidential records are maintained in the lower vault (which has limited access). Records pertaining to clergy accused of some

form of misconduct are maintained in the Confidential Canonical Archive files or by the Office for Ministerial Conduct in accordance with the *Office for Ministerial Conduct File Management Policy*. Records regarding deceased priests are maintained in the lower vault.

2. *Contents of "Personnel Files" for Incardinated Priests, Seminarians, and Permanent Deacons:* Personnel files of priests and permanent deacons incardinated in and seminarians of the Diocese of Manchester should contain the following subfiles, where applicable:

- Education/Formation
- Assignments and letters granting faculties
- Correspondence
- Medical records (*Note: Although it is considered part of the personnel file, medical information should be maintained in a file that is physically separate from the personnel file and under lock and key.*)
- Safe environment records (Safe environment records are defined below)
- Legal (including any W-4, I-9, and other government forms)
- Immigration (when applicable)

Personnel files should not include any correspondence or other documents relating to court cases or alleged violations of the Code of Conduct and should not contain any investigation materials. Those documents are to be retained separately.

3. *Contents of "Personnel Files" for Non-Incardinated Priests and Permanent Deacons:* The following records regarding clergy granted faculties in the Diocese of Manchester (but not incardinated here) and assigned by the Bishop should include, for example:

- Statement of good standing or letter of suitability from bishop/eparch/provincial
- Letter granting faculties
- Assignments (if any)
- Correspondence
- Safe environment records (Safe environment records are defined below)
- Legal (including any W-4, I-9, and other government forms)

Personnel files should not include any correspondence or other documents relating to court cases or alleged violations of the Code of Conduct, and should not contain any investigation materials. Those documents are to be retained separately.

4. *Access to Records:* The bishop, vicar general, vicar for clergy, and the chancellor have access to the "personnel files" of priests, seminarians, and permanent deacons. The bishop will designate those other persons who have access. Upon request to the bishop or chancellor, clerics have access to view their own "personnel files," with the exception of recommendations, references, and other documents that are confidential or privileged under civil or canon law.

Lay Employee Records.

1. *Contents of Personnel Files for Lay Employees:* A personnel file should be maintained for each active diocesan, parish, school, or diocesan institution employee. Personnel files of employees should contain the following, where applicable:
 - Employee application
 - Resume
 - Eligibility verification form (I-9) (I-9 Forms may be maintained in a separate binder or file specifically designated for I-9 Forms and maintained in a confidential manner).
 - W-4 form
 - Employment contract
 - Salary information
 - Benefits information
 - Vacation record
 - Performance evaluations
 - Disciplinary information
 - Medical information (*Note: Although it is considered part of the personnel file, medical information should be maintained in a file that is physically separate from the personnel file and under lock and key.*)
 - Safe environment records

Personnel files should not include any correspondence or other documents relating to court cases, workers' compensation claims, complaints of discrimination or other illegal conduct, and should not contain any investigation materials. Those documents are to be retained separately.

2. *Access to Records:* These records are *confidential* and should be made available only to diocesan, parish, school, or diocesan institution representatives with a legitimate need to know, unless their disclosure is compelled by legal action. Those with a legitimate need to know may include the pastor of the parish where the employee works, the principal of the school where the employee works, the Cabinet secretary who supervises the employee, and the human resources or personnel director or staff member. They would not include, for example, parish or school advisory board members or clergy or lay staff not responsible for supervision of the employee. The employee has the right to review and request a copy of his or her personnel file, as defined by New Hampshire law. Requests should be made in writing and copies of the requests should be stored in the personnel file.

B. Safe Environment Records.

1. *Definition of Safe Environment Records:*

“Safe environment records” refers to all paper and electronic documents pertaining to the Diocese of Manchester safe environment screening and training procedures. Safe environment records include, but are not limited to, Screening Forms, Employment Applications, Volunteer Applications, Code and Policy Acknowledgment Forms, criminal records check results, correspondence regarding negative criminal records checks

results/restrictions, verification of sexual abuse awareness training completion, and sex offender registry results.

2. *Location of Safe Environment Records*

- a. *Employee and Volunteer Records:* Safe environment records for current parish, school, and other diocesan employees should be stored securely at the diocesan entity either in the employee's personnel file or in a separate file, with access limited to those with a legitimate need to view them. Applications and paper acknowledgement forms are stored at the diocesan entity, whereas training records, background check results, electronically-signed acknowledgement forms, and sex offender registry results are stored at the Diocese of Manchester Safe Environment Office and recorded in the Safe Environment Database. Original documents should not be transferred between diocesan entities.
 - b. *Records for former employees and inactive volunteers:* Safe environment records for former employees and inactive volunteers should be maintained at the parish, school, camp, or diocesan entity. The records should be stored securely with access limited to those with a legitimate need to view them. They should be maintained at the location for seven (7) years following the date when the employee was terminated from service or from when the volunteer discontinued his or her work with minors and will then be transferred to the Diocesan Safe Environment Office for storage.
3. *Archiving of Records:* Employee and volunteer safe environment records that are maintained at the parish, school, or diocesan entity will be electronically stored and archived after seven (7) years of inactivity in the Diocese of Manchester.

C. Electronic Records.

1. *"Electronic Record:"* The term electronic record means any record that is created, received, maintained, or stored in diocesan, parish, school, or diocesan institution workstations, central servers, or other electronic devices. Examples include but are not limited to: email, web files, text files, word processing documents, spreadsheets, databases, and other formatted files.
2. *Retention Schedules:* Electronic records must be managed the same as traditional records and in accordance to the [Records Retention Schedule](#) and the policy regarding [Litigation Hold](#) (above).
3. *Work-related Files:* Work-related electronic records are records of the diocese, parish, school, and/or diocesan institution and must be retained accordingly. Some records, such as personal or junk email, are not work-related emails and should be deleted from the system immediately.
4. *Archiving Electronic Records:* Computer/email servers are not intended for long-term record retention periods. As a result, all electronic documents required to be maintained should be printed and maintained on paper. Electronic mail in the diocesan

offices will be archived for six (6) months, after which the mail will be automatically and permanently deleted, subject to the Litigation Hold provision (above).

V. *Digital Imaging*

Certain paper records may be maintained in a digital imaging records system and the original paper records destroyed, provided that the original paper records are not required to be maintained under either civil or canon law, the document does not have historical significance, and the following conditions are met:

- The digital records are complete, accurate, and legible reproductions of the originals;
- The digital records are accessible, available, and readable to all those with a right to access them for as long as they are required to be maintained;
- There are appropriate indexes and other finding aids that will provide access to the information contained in the records;
- Security copies of the digital records and indexes are maintained in secure, off- site storage;
- The original paper records are maintained for a period of six (6) months after converting to digital format for quality control purposes; and
- Authorization for disposal of the original records is obtained from the Chancellor.

Records Retention Schedule

Record Retention Schedule

1. Accounting and Finance
2. Administrative Records (corporation sole/parish)
3. Cemetery Records
4. Confidential Canonical Files (Archivum Secretum – Canon 489)
5. Contracts
6. Correspondence and Internal Memoranda
7. Faith Formation Records
8. Emails
9. Insurance Records
10. Legal files and Papers
11. Miscellaneous
12. Payroll records
13. Pension Records/Supporting Employee Data (maintained by Plan Administrator)
14. Personnel Records (Clergy, Religious, Seminarians)
15. Personnel Records (Lay Employees)
16. Property/Physical Plant Records
17. Publications
18. Sacramental Records
19. Safe Environment Records
20. Safety and Environmental Records
21. School Department/School-Related Records
22. Tax Records
23. Tribunal Records

1. Accounting and Finance

Record Type	Retention Period
1. Accounting and Finance¹	
¹ The Diocesan Administration Finance Office also has a Records Retention policy that is consistent with this schedule but addresses specific records.	
<i>Accounting</i>	
Accounts payable invoices	7 years
Accounts payable ledgers	7 years
Accounts receivable ledgers	7 years
Credit card statements/charge slips	7 years
Tuition collection reports and statements	3 years
Parish collection counts sheets, sealed bag log sheets and fundraising counts sheets	3 years
Invoices and paid bills, major building construction	Permanent
Invoices and paid bills, general accounts	7 years
Cash books	7 years
Cash journals	7 years
Cash journal, receipts on offerings and pledges	7 years
Depreciation records	Permanent
Petty cash vouchers & reconciliation reports	3 years
Receipts	7 years
Mortgage payments & loan statements	7 years
<i>Banking records</i>	
Bank deposits, slips	7 years
Bank statements, reconciliations	7 years
Central Fund statements (savings and loans)	7 years
Cancelled checks, general	7 years
Cancelled checks, important payments	Permanent
Check registers/stubs	7 years
<i>General records</i>	

External audit reports	Permanent
Internal financial review reports	Permanent
Balance sheets, annual	Permanent
Balance sheets, monthly/quarterly	1 year
Budgets, approved/revised	2 years
Financial reports and income statements, annual	Permanent
Financial reports, monthly	1 year
<i>Investment</i>	
Bonds, cancelled	7 years from date of cancellation
Pooled investment reports	7 years
Certificates of deposit, cancelled	3 years after redemption
Letter of credit	7 years
Mortgage records	Permanent
Securities sales	7 years
Stock investments	7 years after sale
<i>Other Financial Records</i>	
Donor lists	Permanent
General ledger/annual	Permanent
Journals, general and specific funds	Permanent
Journal entry sheets	7 years
Chart of accounts	1 year
Year-end trial balance report	Permanent
Ledgers, subsidiary (including tuition, fees)	7 years
Pledge registers/ledgers	7 years
Permanently restricted gift documents	Permanent
Temporarily restricted gift documents	7 years after meeting restrictions
Grant documents (grants issued and grants received)	3 years from final payment or report, or date required by the grant, whichever is longest

2. Administrative Records (corporation sole/parish)

Record Type	Retention Period
2. Administrative Records (corporation sole/parish)	
Annual reports to the Bishop (<i>Status Animarum</i>)	Permanent
Annual Financial Reports	Permanent
Articles of incorporation and bylaws	Permanent
Authorizations and resolutions of the Bishop	Permanent
Bequest and estate records (wills, e.g.)	Permanent
Board/board committee minutes, agendas, resolutions	Permanent
Census records	Permanent
Correspondence, official (regarding diocesan/parish policies, directives)	Permanent
Correspondence, routine	Review/destroy biannually
Directives Issued by Decree	Permanent
Endowment decrees	Permanent
Finance Council minutes	Permanent
Historical record (newspaper clippings, anniversary books, photos, etc., regarding history of diocese/parish)	Permanent
Inventories of property and equipment	Permanent [<i>or retain until superseded</i>]
Leases (other than real property; for real property see Property/Physical Plant Records)	7 years after expiration of lease term
Liturgical ministers' schedules (altar servers, lectors, Eucharistic ministers, etc.)	Retain until superseded
Mass intention records/books	2 years
Office files	Selective retention: review and retain only those that document diocesan/parish administration and official activity
Organizational records for diocese/parish (minutes, correspondence, publications, etc.)	Permanent

Participant Release	4 years after event
Pastoral council constitutions	Retain until superseded
Pastoral council minutes	Permanent
Priest personnel board minutes	Permanent
Photographs (relating to diocesan/parish history)	Permanent
Policy statements, policy manuals, employee handbooks	Permanent
Religious education reports	Permanent
Rosters of parishioners/parish directories	Permanent
Wills, testaments, codicils	Permanent

3. Cemetery Records

Record Type	Retention Period
3. Cemetery Records	
Annual cemetery financial reports (statement of activities, statement of financial position, and general ledger transactions)	Permanent
Burial/interment (Lot Cards) for all interred. Record of the interred's name, date of burial, date of birth, date of death, lot location, section, grave number, and grave layout within the lot	Permanent
Cemetery Rules and Regulations of the Diocese of Manchester	Permanent
Cemetery Specific Supplemental Rules	Permanent
Electronic documents (spreadsheet and database systems) of interment records, lot licenses, family history, lot location, grave layouts, contracts, and maps	Permanent
Family (heir) information documents	Permanent
Heir authorization forms (for interment, designations, memorialization, and disinterment)	Permanent
Lot holder written instructions including lot holder rights' designation and burial designation documents	Permanent
Lot holder contracts (all)	Permanent
Lot licenses (formerly known as deeds, easements, burial licenses, and burial right contracts)	Permanent
Lot holder obituaries	Permanent
Lot holder rights relinquishment forms and/or lot sell back documents to the cemetery	Permanent
Management authorization forms for monuments/memorials/markers	3 years
Paper copies of maps of lots/burials and graphs- Grave layout within lots	Permanent
Permits from State (burial and disinterment)	Permanent
Perpetual care records	Permanent

4. Confidential Canonical Files (Archivum Secretum – Canon 489)

Record Type	Retention Period
4. Confidential Canonical Files <i>(Archivum Secretum – Canon 489)</i>	
All files	Retain for period prescribed by the Code of Canon Law

5. Contracts

Record Type	Retention Period
5. Contracts	
Contracts and related records	7 years after final performance under the contract

6. Correspondence and Internal Memoranda

Record Type	Retention Period
6. Correspondence and Internal Memoranda	
Correspondence or memoranda related to documents enumerated in this Schedule	Same time period as specified for the underlying record
Correspondence or memoranda having no significant or lasting consequences (such as routine letters or notes, letters or memoranda for which no acknowledgement or follow up are necessary)	1 year
Unwanted or unsolicited advertising or promotional material received through the mail or electronic mail	Discard/destroy immediately
Correspondence or memoranda pertaining to non-routine matters, or having lasting or significant consequences (such as letters explaining diocesan policy)	5 years

7. Faith Formation Records

Record Type	Retention Period
7. Faith Formation Records	
Registration forms	3 years
Attendance records	3 years
Permission slips, medical release forms	7 years from date of event
Class lists	Permanent
Class schedules	Retain until superseded by new schedule

8. Emails

Record Type	Retention Period
8. Emails	
Emails stored on the server	Six (6) months from date of creation of the email message (subject to longer period as directed by Bishop for compelling reason, including, but not limited to, need to preserve records for longer period due to pending litigation)
Emails containing material that falls within one of the longer retention periods in this policy	Print email or save electronically and retain for period specified in this policy
Ephemeral Correspondence (personal email, requests for recommendations or review, email related to day-to-day operations and ministry)	Retain until read, then delete as soon as possible but not later than six (6) months

9. Insurance Records

Record Type	Retention Period
9. Insurance Records	
<i>Policies</i>	
Insurance policies – active	Permanent
Insurance policies – cancelled	Permanent
<i>Claims files</i>	
Workers compensation claims files	20 years after close of matter
Liability claim	10 years after settlement or last correspondence with claimant

10. Legal files and Papers

Record Type	Retention Period
10. Legal files and Papers	
Correspondence, legal	10 years
Legal opinion/memorandum	10 years
Real estate claims	21 years

11. Miscellaneous

Record Type	Retention Period
11. Miscellaneous	
Policies/procedures manuals	Permanent

12. Payroll records

Record Type	Retention Period
12. Payroll records	
Payroll journals	7 years
Payroll registers, summary schedule of earnings, deductions, and accrued leave	7 years
Payroll/earnings records (timesheets, payroll reports, payroll deduction authorizations)	7 years after end of employment

13. Pension Records/Supporting Employee Data (maintained by Plan Administrator)

Record Type	Retention Period
13. Pension Records/Supporting Employee Data (maintained by Plan Administrator)	
Pension records/vesting files	For lifetime of plan
Retirement benefits records	For lifetime of plan
Pension payment records	For lifetime of plan

14. Personnel Records (Clergy, Religious, Seminarians)

Record Type	Retention Period
14. Personnel Records (Clergy, Religious, Seminarians)	
<i>Incardinated Clergy and Non-Incardinated Externs and Religious</i>	
Application for Seminary	Until date of death
Sacramental Documents	Permanent
Records concerning fitness for duty	Permanent
Summary regarding Assignments	Permanent
Background Screening documents	Permanent
Wills and Funeral wishes	Permanent
Statements of good standing from bishop/eparch (if applicable)	Permanent
Letter granting faculties	Permanent
Seminary records	Until date of death (or return to lay state)
Correspondence	Until date of death (or return to lay state)
Records regarding complaints, misconduct (if applicable)	Until date of death or ten years after condemnatory sentence, if applicable
Summary of allegations of misconduct and conclusions of investigations (if applicable)	Permanent
Medical Records	Until date of death (or return to lay state)
<i>Seminarians/Permanent Deacon Candidates</i>	

<p>Personnel file (including confidential medical and personal information and canonical/sacramental subfiles)</p>	<p>Until ordination – then maintain and follow schedule for incardinated clergy</p> <p>If not ordained by reason of death of the individual – 7 years</p> <p>If not ordained by reason of voluntary or involuntary departure from the program, documents (or a summary) related to the reasons for the departure from the program are to be maintained permanently. All other materials contained in the personnel file are to be retained for 7 years.</p>
<p>Records of applicants for seminary whose applications were rejected or were withdrawn before enrollment in seminary</p>	<p>2 years after the date on which the application was withdrawn or rejected</p>

15. Personnel Records (Lay Employees)

Record Type	Retention Period
15. Personnel Records (Lay Employees)	
<i>General records</i>	
Attendance records (time cards, time sheets)	7 years after end of employment
Emergency contact records	Retain until superseded
Employee contracts (teachers and principals at diocesan schools, extended day care directors, and certain cemeteries department employees)	7 years after end of employment
Employee salary schedules	7 years after end of employment
Payroll/earnings records (timesheets, master payroll reports, payroll deduction authorizations)	7 years after end of employment
Personnel file	7 years after end of employment
Vacation/sick leave records	7 years after end of employment
Separation records	7 years after end of employment
<i>School employee records</i>	
Any school-employee-specific records (such as credentials, degrees, fingerprinting information, tuberculosis screening, bloodborne pathogen training, catechist certification) that may be contained in the employee’s general personnel file	7 years after end of employment
<i>Disability/injury/medical records</i>	
Disability records (confidential)	7 years after return to work, retirement, or death
Accident/injury reports	7 years
Employee medical complaints	7 years
Employee medical records (confidential)	7 years from end of employment
<i>Job applicant records</i>	
Application records – individuals not hired	2 years
Job advertisement records	2 years
<i>Tax/eligibility/payroll records</i>	

W-2 forms	7 years from date of filing
W-4 forms	7 years from date of filing
I-9 forms	Retain during employment. After end of employment, maintain either: (1) 3 years from hire date; or (2) 1 year after termination date, whichever is greater.
1099 forms	7 years from date of filing

16. Property/Physical Plant Records

Record Type	Retention Period
16. Property/Physical Plant Records	
Architectural records, blueprints, building designs, specifications	Retain until property is sold
Architectural drawings	Retain until property is sold
Deeds and Easements	Permanent
Leases	Retain 7 years after the expiration of the lease
Licenses/Occupancy Agreements	Retain 4 years after the expiration of the licenses or occupancy agreement
Mortgage documents	Retain mortgage discharge permanently; retain all other documents until 3 years after mortgage is paid in full
Property appraisals	Retain until property is sold
Property assessments (such as environmental site assessment)	Permanent
Real estate surveys/plots, plans	Permanent
Short-Term Facility Use Agreement	Retain 4 years after the expiration of the agreement
Supporting file from closing of the purchase of real estate (including purchase and sale agreement and any other agreements)	Retain disclosures such as HUD Settlement Statement and Real Estate Transfer Tax Declaration (CD-57-S) for seven years following the transaction closing date; retain agreements until property is sold
Title search papers and certificates	Permanent

17. Publications

Record Type	Retention Period
17. Publications	
Anniversary books	Permanent (at least one copy at the Parish and one copy to the Historical Archives)
Annual reports to the diocese/parish	Permanent
Diocesan directories	Permanent
Magazines, newspapers, newsletters of the diocese/parish or affiliated organizations	Permanent
Parish directories	Permanent
Parish bulletins	Permanent

18. Sacramental Records

Record Type	Retention Period
18. Sacramental Records	
Baptism register	Permanent
First Communion register	Permanent
Catechumen register (if in use by the parish)	Permanent
Confirmation register	Permanent
Book of the Elect	Permanent
Ordination Records	Permanent
Marriage register	Permanent
Marriage preparation records, Marriage envelopes	Permanent
Sick call register	Permanent
Death register	Permanent

19. Safe Environment Records

Record Type	Retention Period
19. Safe Environment Records	
Safe environment records concerning employees and volunteers at parishes, schools, or other diocesan entities	Permanent. Parishes, schools, and other diocesan entities transfer the records to the Diocesan Safe Environment Office 7 years after employment or volunteer services permanently cease.
Safe environment records concerning clergy assigned to any parish or diocesan workplace	Permanent
USCCB Audit Report	Permanent
Children and youth training records (e.g., Circles of Care/Netsmartz tally sheets, opt-out and declination forms, attendance records)	7 years
Reports of suspected abuse regarding clergy, employees, volunteers in ministry	Permanent

20. Safety and Environmental Records

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Record Type	Retention Period
20. Safety and Environmental Records	
Accident/injury reports	7 years from end of year in which occurrence took place
Environmental test records/reports	Permanent
Hazardous exposure records	Permanent
Toxic substance exposure records	Permanent
Safety Data Sheets (Material Safety Data Sheets)	30 years after discontinuation of the use of the toxic substance

21. School Department/School-Related Records

Record Type	Retention Period
21. School Department/School-Related Records	
<i>Administrative records</i>	
School Advisory Council minutes	7 years
Accreditation files	Permanent
Assessment materials (student testing materials such as completed exams, forms, reports, and printed materials related to standardized tests/assessments)	Final reports: Permanent Other materials: retain until superseded
Catholic Identity Review report	7 years
Class lists	Permanent
Class schedules	Retain until superseded by new schedule
E-rate records	7 years from last date of service
Faculty meeting minutes	Retain until next accreditation cycle (or three years, whichever is later)
Field trip forms, permission slips, medical release forms	7 years after date of event/trip
Grade books	Cum file reports: Permanent Yearly grade books: 1 year
Student rosters (including graduation lists)	Permanent
Handbooks (faculty, staff, parent, student)	Retain until updated (archive at least one copy permanently)
Newsletters (to parents, school community)	Retain until next accreditation cycle (or three years, whichever is later)
Parent-Teacher Organization minutes	Permanent
Promotion lists	Retain until superseded
Teacher's attendance register	Permanent
Textbook inventory	Retain until superseded
Yearbooks	Permanent
<i>Student records</i>	
Academic dismissal	Permanent (record in cumulative file)

Accident Reports	5 years
Administration of Medication forms	Retain 1 year after transfer
Application, registration, and enrollment records	Retain until end of current school year
<p>Attendance Information:</p> <ol style="list-style-type: none"> 1. Record of Number of Days Absent and Times Tardy 2. Written Absence and/or Tardy notes, dated and signed by parents. 3. Attendance Registers (daily attendance recorded in legal register provide) 4. Sign-in, sign-out sheets (for Preschool, Extended Care and regular school day) 	<ol style="list-style-type: none"> 1. Permanent (reported on cumulative record) 2. Retain until end of current school year then destroy 3. Permanent school file 4. Retain in general school file until end of year then destroy
Behavioral Pattern Reports	Retain in separate file (not in cumulative file); destroy 6 months after cumulative file has been transferred to next school.
Certificate of Eligibility for Nonimmigrant (F-1) Student Status – for Academic and Language Students	Permanent; record in cumulative file
Child Abuse Reporting Record	Retain in a confidential separate school file permanently (*if the Administrator is aware of the Report)
Child Custody Records	Permanent; record in cumulative file. Retain in a confidential separate school file permanently.
Detention (Notice of Detention to parents)	1 year
Discipline data	Retain as long as student is enrolled in school
Emancipated Student	Permanent; retain in cumulative file
Emergency information cards	Retain most current card in general school file, destroy previous cards
Expulsion	Permanent; record in cumulative file
Guidance Counselor notes	Retain in separate file (not in cumulative file); destroy 6 months after cumulative file has been transferred to next school
Health record	Forward to receiving school when student transfers/graduates (do not retain a copy of the health record)

Health-related occurrence, record of student	Retain 3 years then destroy
Individual Education Plans	Retain until 1 year after student transfers/graduates; then send to parents/guardians
Parental authorizations or prohibitions of student participation in specific programs (not field trip forms)	Retain until end of current school year then destroy
Parental restrictions re: access to directory information or related stipulations	Retain until end of current school year then destroy
Permanent Student Record (cumulative record)	Original must be permanently retained by the sending school; a copy must be transferred by mail to the next school upon written request from parent/legal guardian obtained by the school or district where the student intends to enroll
Permission to walk home or to parent's work location after school	Retain until end of current school year then destroy
Referral of student to public agents or counselors	3 years
Restraining Orders	Retain in file until transfer of student or original is superseded
Sports Participation Forms	3 years after conclusion of season for the sport to which form applies
<p>Standardized test results</p> <ol style="list-style-type: none"> 1. Student record label 2. Copy of student report for tests administered while student attended school 	<ol style="list-style-type: none"> 1. Permanent – affix to cumulative file 2. Retain in separate file; destroy 1 year after student has transferred schools
Suspension records	3 years after student leaves school. Retain in separate file (not in cumulative file)

22. Tax Records

Revised May 1, 2023

Record Type	Retention Period
22. Tax Records	
Employment taxes, contributions, and payments, including taxes withheld and FICA	7 years from date of filing
W-2 Forms	7 years from date of filing
W-4 Forms	7 years from date of filing
Form 990	Permanent
State tax exemption certificates (income, excise, property, sales/use etc.)	Permanent
1099 Forms	7 years from date of issuance
Unemployment tax records	7 years from date of filing
IRS exemption determination letter (for organizations other than those under the USCCB Group Ruling)	Permanent

23. Tribunal Records

Revised May 1, 2023

Record Type	Retention Period
23. Tribunal Records	
Judicial cases	Permanent, according to the prescripts of Canon Law
Administrative and Documentary cases	Permanent, according to the prescripts of Canon Law
Marriage Dispensations and Permissions	Permanent, according to the prescripts of Canon Law
Radical Sanations	Permanent, according to the prescripts of Canon Law