



## DIOCESE OF SACRAMENTO

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OFFICE OF THE BISHOP

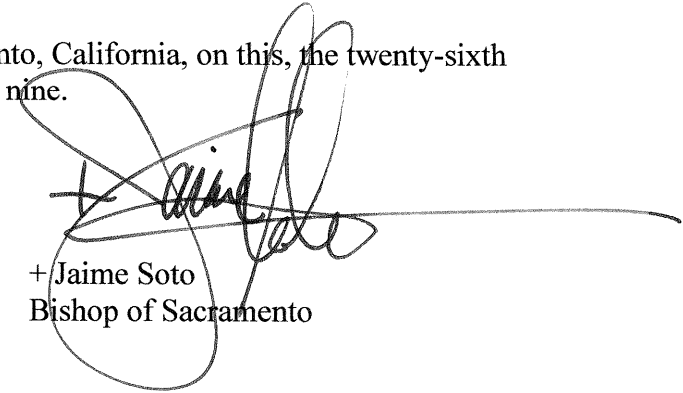
### DECREE OF PROMULGATION Document Retention Policy

In order to maintain and safeguard the acts of the diocesan curia in accordance with both Canon Law and civil law, I do hereby promulgate as particular law of the Diocese of Sacramento the attached *Document Retention Policy* for the Diocese of Sacramento, to be effective the first day of July, 2009.

I further order, in accordance with the 2006 *Diocesan Statutes* (#4), that notice of this promulgation be placed in the “official” column of the *Catholic Herald*, and that the policy be posted on the Diocesan website, and incorporated into all future relevant compilations of particular law (e.g., *Pastoral Policies and Guidelines*, *Parish Financial Management Handbook*).

Pastors, Diocesan department and agency directors, and others responsible for maintaining records are to be appropriately notified and educated on the policy by the Office of the Chancellor.

Given at the Diocesan Pastoral Center in Sacramento, California, on this, the twenty-sixth day of June, in the year of our Lord, two thousand nine.



+ Jaime Soto  
Bishop of Sacramento



Kathy Conner  
Chancellor

# DOCUMENT RETENTION POLICY

## DIOCESE OF SACRAMENTO

### STATEMENT OF POLICY

In carrying out its mission of ordering divine worship, caring for the decent support of the clergy and other ministers, and exercising works of the sacred apostolate and of charity, especially toward the needy, 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 a number of documents which, by law, must be protected with the greatest care. Indeed, the *Code of Canon Law* states, “In every curia there is to be erected in a safe place a diocesan archive, or record storage area, in which instruments and written documents which pertain to the spiritual and temporal affairs of the diocese are to be safeguarded after being properly filed and diligently secured.” (CIC, c. 486 §2) The oversight of the archives is the responsibility of the Chancellor, whose “principal function” is to “take care that acts of the curia are gathered, arranged, and safeguarded in the archive of the curia.” (CIC, c. 482 §1)<sup>1</sup>

Various provisions of state and federal law also require the Diocese to maintain certain types of records, usually for a specified period of time. Failure to follow this policy can cause significant harm to the diocese and its workers.

The records of the Diocese are, therefore, important patrimony. They include essentially all records produced by church workers during the course of their duties, whether on paper or electronically. A record may be as obvious as a memorandum, a letter, an e-mail, or a contract, or something not as obvious, such as a computerized desk calendar, an appointment book or an expense record.

Accordingly, the Diocese expects all church workers, at any diocesan or diocese-affiliated ministry site, to comply fully with the following records retention and destruction policies and schedules, provided that all church workers note and comply with the “general exception” set forth in section 2.0 of the Policy, below.

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<sup>1</sup> In the event the Chancellor of the Diocese is not a priest, then in light of certain restrictions required under Roman Catholic Canon Law, the policy of the Diocese is that the Chancellor shall not have custody of, or access to, records of priests. In such a circumstance, the custody of records of priests, and access to those records, shall instead be given to the vicar general, the episcopal vicar for clergy, the judicial vicar, and/or the vice chancellor (provided that office is held by a priest), or to such other individuals as the Diocesan Bishop may designate.

## **POLICY PROVISIONS**

### **1.0 PURPOSE**

The Document Retention Policy for the Diocese of Sacramento defines which diocesan 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, and will ensure that

- Vital records will be protected and retained
- The Diocese will reduce its costs associated with maintaining and storing records
- The data management and storage operations of the Diocese will be enhanced
- Fewer diocesan records will need to be maintained

### **2.0 SCOPE**

This Document Retention Policy applies to all church workers of the Diocese, all parishes within the Diocese, and to all affiliated entities of the Diocese. There are no exceptions to the implementation of this Policy, other than the following:

#### **\*\*General Exception to Document Retention Destruction Policy\*\***

If a church worker believes, or the Diocese informs him or her, that Diocesan records are relevant to current civil or canonical litigation, or potential civil or canonical litigation (i.e., a dispute that is likely to lead to litigation), then the church worker must preserve those records until the Chancellor of the Diocese in consultation with canonical and legal counsel determines the records are no longer needed. This exception always supersedes any previously or subsequently established destruction schedule for the affected records. If a church worker believes that an exception may apply, or has any question regarding the possible applicability of that exception, that employee should contact his or her supervisor, or the Moderator of the Curia or the Chancellor, who will, in turn, consult canonical and legal counsel as is appropriate.

### **3.0 GENERAL DEFINITIONS**

“Media”                      Paper, electronic mail, or electronic storage device (e.g., flash memory device, floppy disk, hard disk, CD-ROM, magnetic tape, microfilm, microfiche, or any similar data storage medium) used to develop, maintain, or transmit diocesan records

- “Records” Correspondence, documents, or any other media generated, distributed, or maintained by a diocesan employee in the performance of his or her job duties.
- “Retention period” The time period that records must be maintained to satisfy legal and business requirements.
- “Church worker” For purposes of this policy, a church worker includes clergy, religious, seminarians, deacon candidates, employees and volunteers.

## 4.0 DOCUMENT RETENTION POLICY

### 4.1 General Provisions:

- A. Follow Applicable Retention Schedules: Diocesan records are to be maintained according to the guidelines established in the Records Retention Schedule (attached as Appendix A).
- B. Implementation of Retention Schedules: Records are to be maintained only for the recommended retention period; records no longer required for any ministerial, canonical or legal purpose are to be discarded and destroyed. The filing and retaining of documents in diocesan ministry sites should therefore, to the extent possible, be done in a manner that permits ready application of the retention period for particular documents. An example of this principle would be the storage of documents of a uniform or like type and date range in boxes bearing a written designation “Destroy After [date].” In circumstances where documents of different date ranges are stored and interspersed with other active files, the ministry site supervisor responsible for document retention compliance should undertake at least an annual review of files to remove and segregate those documents whose retention is no longer required under the applicable retention period. Any such documents should then be destroyed.
- C. Destruction of Documents: Each department, parish, and/or agency is responsible for the prompt disposal or 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 for identity theft; fraud, or other unlawful purposes. Such documents must be destroyed under the direct supervision of the responsible supervisor, must be destroyed or shredded in a manner that reasonably ensures that confidential information may not be thereafter sifted out of the byproducts, and must be destroyed on the workplace premises. In lieu of destruction by the

responsible supervisor, the diocesan entity may retain the services of a reliable and reputable document-destruction company that provides secured document destruction/shredding and a certificate of destruction.

D. Miscellaneous Provisions:

- Each department, parish, or agency is responsible for maintaining its own records. Records may be maintained on-site or stored off-site at a secure document retention facility.
- The Chancellor, in consultation with the Bishop's canonical adviser and the Diocesan General Counsel, is responsible for establishing retention schedules for any records not enumerated in the Records Retention Schedule.
- If two retention times appear to conflict, select the longer retention time and contact the Chancellor for clarification.

E. Questions: All questions about the retention and destruction of specific records or the departmental, parish, or agency responsibility for maintaining certain types of records should be referred to the Chancellor who may then consult the canonical and civil counsel in determining a response.

**4.2 Enforcement.**

The success of the Document Retention Policy for the Diocese of Sacramento lies in uniform and diligent enforcement of its provisions. For this reason, the failure by an employee to comply with the provisions herein may subject that church worker to disciplinary action, up to and including termination of employment. Any church worker found to have knowingly and intentionally violated this policy will be subject to immediate dismissal.

**5.0 CONTENT AND TREATMENT OF SPECIFIC TYPES OF FILES.**

**5.1 Incardinated Clergy Personnel Records (Incardinated Presbyters and Deacons).**

A. File Types: Incardinated clergy records shall consist of the following files:

- (1) A "*Personnel File*" for the individual cleric, that shall include two sub-files: (a) a confidential medical and personal information file, and (b) a canonical/sacramental file; and
- (2) A "*Correspondence File*" associated with the individual cleric.

- B. File Categories: Incardinated clergy records are organized in three categories:
- (1) “*Active*,” pertaining to those clerics in active ministry in the Diocese of Sacramento;
  - (2) “*Inactive*,” pertaining to retired clerics and former active clerics no longer serving in active ministry in the Diocese of Sacramento.
  - (3) “*Deceased*,” pertaining to incardinated clergy who have passed away.
- C. Access to Files: Access to these files shall be determined by the Diocesan Bishop, who shall designate those persons, other than the Chancellor, who are to have access.
- D. Content of Personnel Files: Incardinated clergy personnel files contain general information regarding the respective cleric, including:
- Personnel File:
    - (1) Documents pertaining to any application for incardination in the Diocese (if applicable).
    - (2) The Clergy Data Sheet, and supporting documentation regarding parish or other diocesan assignments for the cleric.
    - (3) Immigration information (if applicable), including visas, residency permits, passport information.
    - (4) Driver’s license information.
      - *Sub File: Confidential Medical and Personal Information*:
        - (1) Psychological assessment or medical screening/treatment documentation pertaining to the cleric, that might be received by the Diocese in connection with screening or assessment of the cleric’s fitness to minister in this diocese.
        - (2) Personal, confidential information pertaining to the cleric (e.g., self assessment documents) that, in the determination of the Diocesan Bishop or his designee should be segregated from general personnel documents.
      - *Sub File: Canonical / Sacramental Information*
        - (1) Documents related to the cleric’s canonical status, including baptismal and confirmation certificates, ordination records, and, if applicable, declaration of nullity of marriage.

- Correspondence File:

- (1) Correspondence between the Bishop and the cleric, pertaining to the cleric's assignment, responsibilities, and any other work or ministry-related matters.
- (2) General correspondence received by the Bishop/Diocese about the cleric, that the Bishop or his designee deems worthy of retention as bearing upon the cleric's continued service in the Diocese (letters of appreciation, complaint, etc.)

## 5.2 Non-Incardinated Clergy Personnel Records (Externs and Religious)

### A. File Types: Non-incardinated clergy records consist of the following files:

- (1) A "*Personnel File*" for the individual extern or religious, that shall include two sub-files: (a) a confidential medical and personal information file, and (b) a canonical/sacramental file; and
- (2) A "*Correspondence File*" associated with the individual extern or religious.

### B. File Categories: Non-incardinated clergy records are organized into three categories:

- (1) "*Active,*" pertaining to those externs or religious who are in active ministry in the Diocese of Sacramento;
- (2) "*Inactive,*" pertaining to externs and religious who are no longer in ministry in the Diocese (either due to retirement or to return to their diocese or religious order of origin).
- (3) "*Deceased,*" pertaining to externs or religious who at some point ministered in the Diocese of Sacramento, but who have passed away.

### C. Access to Files: Access to these files shall be determined by the Diocesan Bishop, who shall designate those persons, other than the Chancellor, who are to have access.

### D. Content of Personnel Files: Non-incardinated clergy personnel files contain general information regarding the respective extern or religious, including:

- Personnel File:

- (1) Documents pertaining to application(s) for employment in, or the granting of faculties to minister in, the Diocese (if applicable).
- (2) The Clergy Data Sheet, and supporting documentation regarding parish or other diocesan assignments for the extern or religious.

(3) Immigration information (if applicable), including visas, residency permits, passport information.

(4) Driver's license information.

▪ *Sub File: Confidential Medical and Personal Information*

(1) Psychological assessment or medical screening/treatment documentation pertaining to the extern or religious that might be received by the Diocese in connection with screening or assessment of the individual's fitness to minister in this diocese.

(2) Personal, confidential information pertaining to the extern or religious that, in the determination of the Diocesan Bishop or his designee should be segregated from general personnel documents.

▪ *Sub File: Canonical / Sacramental Information*

(1) Documents related to the individual's canonical status, including baptismal and confirmation certificates, ordination records, and, if applicable, declaration of nullity of marriage, etc.

▪ *Correspondence File:*

(1) Correspondence between the Bishop and the extern or religious, or between the Bishop and the individual's diocesan bishop or religious superior, pertaining to the extern or religious' assignment, responsibilities, and any other work or ministry-related matters.

(2) General correspondence received by the Bishop/Diocese about the extern or religious, that the Bishop or his designee deems worthy of retention as bearing upon the individual's continued service in the Diocese (letters of appreciation, complaint, etc.)

### **5.3 Seminarian and Deacon Candidate Records**

A. File Types: The seminarian and deacon candidate records for the Diocese of Sacramento shall consist of the following files:

(1) A "*Personnel File,*" including two sub-files: (a) a confidential medical and personal information file, and (b) a canonical/sacramental file; and

(2) A "*Correspondence File.*"



- B. File Categories: Seminarian records are organized into three categories:
- (1) “*Active*,” pertaining to those seminarians or deacon candidates in active formation in the Diocese of Sacramento.
  - (2) “*Inactive*,” pertaining to seminarians or deacon candidates who fail, for any reason, to complete their formation in the Diocese of Sacramento.
  - (3) “*Deceased*,” pertaining to inactive seminarians or deacon candidates who have passed away prior to completion of priestly formation or ordination.
- C. Access to Files: Access to these files shall be determined by the Diocesan Bishop, who shall designate those persons, other than the Chancellor, who are to have access.
- D. Content of Seminarian Files: Seminarian Personnel files shall contain general information regarding the respective seminarian or deacon candidate, including:
- Personnel File:
    - (1) Application(s) for admission to the formation process.
    - (2) The Seminarian Data Sheet, and supporting documentation regarding parish or other diocesan assignments for the seminarian/transitional deacon.
    - (3) Transcripts and evaluations from the institution(s) attended by the seminarian during his formation process.
    - (4) Immigration information (if applicable), including student visas, residency permits, passport information.
    - (5) Drivers license information.
    - (6) In the event the seminarian does not complete the formation process and leaves the program, whether voluntarily or as directed by the Diocese, documents related to the individual’s departure. (In the event that the material is confidential and personal in nature, these materials may be filed in the “Confidential Medical and Personal Information” sub file.)
  - Sub File: Confidential Medical and Personal Information
    - (1) Psychological assessment documentation pertaining to the seminarian/deacon candidate, and medical reports received by the Diocese as part of the physical examination/health assessment portion of seminarian screening.

- (2) Personal, confidential information (e.g., self assessment documents) that, in the determination of the Diocesan Bishop or his designee should be segregated from general personnel documents.

- *Sub File: Canonical / Sacramental Information*

- (1) Documents related to the seminarian or deacon candidate's canonical status, including baptismal and confirmation certificates (and, if applicable, declaration of nullity of marriage), and documents pertaining to the seminarian's promotion to orders, requests by the seminarian to the bishop for installation and/or ordination, the call to ministry and orders, and installation and ordination certificates.

- Correspondence File:

- (1) Correspondence to/from the Office of Vocations and any seminary or institute attended by the seminarian prior to ordination.
- (2) General correspondence received by the Bishop/Diocese concerning the seminarian that the Bishop or his designee deems worthy of retention as bearing upon the decision to call the seminarian to orders (letters of appreciation, complaint, etc.)

Upon completion of priestly formation and ordination, that seminarian's records will thereafter be maintained in a manner consistent with the policies for Priest Records, set forth in paragraph 5.1, above.

#### **5.4 Lay Employee Records**

A. File Types: Lay employee records for the Diocese of Sacramento include a general personnel file, containing material set forth below. A lay employee may also have records related to work eligibility, workplace injuries, and medical records (for purposes of disability accommodation or protected leave) — materials that will be kept in separate confidential files.

B. File Categories: Lay employee records shall be classified according to the following three categories:

- (1) "*Active employee,*" pertaining to lay employees currently employed by the Diocese of Sacramento, whether at the Pastoral Center, a parish, a diocesan school, or at another diocese-affiliated entity.
- (2) "*Former employee,*" pertaining to lay employees who are now retired, resigned, discharged, or otherwise no longer employed by the Diocese.

- (3) *“Applicant / not hire,”* pertaining to individuals who have applied for employment within the Diocese of Sacramento, but who were not hired.

C. Access to Files:

- (1) *Pastoral Center:* Lay personnel records at the Pastoral Center will be maintained in a uniform manner by the Office of Lay Personnel, which will supervise access to such files by other departments, parishes, or agencies. Records other than the general personnel file (such as medical or disability files) will be maintained in confidential folders in secure filing cabinets, separate from general personnel records. Access to confidential records will be strictly limited to the Diocesan Bishop or his delegate, the Chancellor, or the Director of Lay Personnel.
- (2) *Parishes / Diocesan Schools:* Lay personnel records located at parish or school facilities in the Diocese will also be maintained in a uniform and organized manner, in secured files, with access to those records supervised by the pastor or his designee, or, in the case of school records, the principal or his or her designee. Records other than the general personnel file (such as medical or disability files) will be maintained by the parish or school in confidential folders, in secure filing cabinets, separate from general personnel records. Access to confidential records of this nature will be strictly restricted to the pastor or his designee, or the principal or his or her designee.

D. Content of General Personnel Files:

- (1) General personnel files for diocesan lay employees contain the following information:
  - Original, signed Pre-Application Statement & Acknowledgment
  - Original, signed Pre-Application Questionnaire
  - Application for employment
  - Copy of advertisement for that position (if any)
  - Resume of employee
  - New Employee form (PT 100)
  - Job description
  - Original, signed employment contract form (principals and teachers at diocesan schools, extended day care directors, and certain cemeteries department employees)

- Original, signed copies of Personnel Handbook acknowledgments (Acknowledgment of Receipt of Handbook; Acknowledgment of Diocesan Policies as Religious Employer; Antidiscrimination/Antiharassment Policy Acknowledgment; Electronic Communications Policy Acknowledgement; and Agreement Regarding Arbitration of Disputes)
  - A copy of the signed acknowledgment for the Code of Pastoral Conduct. (Originals of the acknowledgment form are forwarded to, and will be maintained by, the Safe Environments Coordinator for the Diocese, at the Pastoral Center.
  - Records concerning fingerprint/background clearance of the employee, if applicable. (Note: Actual criminal background information received from the Department of Justice will be retained as set forth in Section 5.5, below.)
  - IRS Form W-4
  - Direct deposit authorization form
  - Job-related training records (e.g., sexual harassment prevention training, safety training)
  - Job assignment/promotion record
  - Salary information
  - Records of sick leave
  - Records of vacation
  - Performance evaluations
  - Records related to workplace discipline (including written warning forms)
  - Benefits enrollment application
  - Pension plan beneficiary designation form
- (2) In addition to the contents outlined above, the personnel files for lay employees at diocesan schools contain the following additional materials:
- Catechist certification
  - Child abuse reporting acknowledgment form
  - Credential, license, or certification documents

- Educational transcripts and proof of degree(s)
- Fingerprinting information (documentation that fingerprint background check has been completed — not actual criminal background material, if any)
- Tuberculosis screening documentation
- Bloodborne pathogen training documentation

(3) Types of records not enumerated above should not be added to the general personnel file without review by the Director of Lay Personnel, who will ordinarily consult with canonical counsel and Diocesan Attorneys as appropriate in determining the appropriate manner of handling the type of file or record in question.

E. Records Not To Be Kept In General Personnel File (Confidential Files): In general, any records that are not job related should not be retained in an employee's personnel file. The following types of records, although job related, shall not be included in a lay employee's personnel file, but shall be retained in separate confidential files, in secure filing cabinets, with restricted access:

- Verification of eligibility to work in the U.S., Form I-9
- Emergency information sheet
- Medical leave records
- Medical information pertaining to the employee (including information protected under the Americans with Disabilities Act or the California Confidentiality of Medical Information Act)
- Records related to any complaint of discrimination filed with federal or state government agencies
- Workers' compensation claims and related records

## 5.5 Criminal Background Check Records

A. Purpose of Records: Consistent with the call of the Charter for the Protection of Children and Young People (adopted by the U.S. Conference of Catholic Bishops), the Diocese requires fingerprint background checks for all clergy and religious, as well as for all volunteers and employees (in connection with any diocesan entity or activity) who have contact with minor pupils at diocesan schools or who have supervisory or disciplinary power over minors in their care. After any employee or volunteer submits fingerprints to the California Department of Justice (DOJ), the Diocese thereafter receives confidential

reports from DOJ concerning whether the individual has a criminal record. The Diocese also receives follow up notices from DOJ concerning the individual, if, after the initial fingerprint background check, the individual is later convicted of any criminal offense.

- B. Use of Records: Criminal background check records are used by the Diocese to determine whether the individual has a criminal background that would disqualify him or her from employment or volunteering in certain settings (e.g., an applicant would be disqualified from employment as a teacher if he or she had a prior offense involving child abuse). The information received from DOJ is maintained in secured files, with strictly-limited access. It is the intent of the Diocese to receive and retain criminal history information received from DOJ in a manner consistent with the requirements of state law and the regulations issued by DOJ.
  
- C. Retention of Records: Criminal background check records on specific individuals will be retained for as long as that individual continues to engage in ministry within, volunteer with, or be employed by, any entity of the Diocese (parish, school, ministry, etc.). Retention according to this schedule is a business necessity for the Diocese, given that clergy, religious, volunteers or employees may engage in ministry in, or volunteer or work at different diocesan workplaces or ministries (or may work in one location and volunteer at another), and retention of the records will permit verification of qualification for a variety of positions without a gap in the coverage of such information or the need for re-submission of fingerprint records in connection with each ministry or diocesan activity in which the individual participates. These records will be destroyed at such time as the individual ceases engaging in ministry within, volunteering for, or being employed by, the Diocese, and where the individual provides the Diocese with notice that he or she no longer intends thereafter to volunteer or work for any diocesan workplace, ministry, or activity.

## 5.6 Electronic messages (Email)

- A. Purpose of Emails: The objectives of using electronic messaging are primarily to take advantage of a fast and automated means of communication, and to exchange information more efficiently than by telephone or written memorandum. Email also reduces the generation and handling of paper documents by shifting the creation, transmission, and retention of short-term correspondence to electronic form.
  
- B. Prohibited Uses: Email shall not be used for transmission of information that promotes or transacts the following: discrimination on any basis prohibited by applicable law; sexual harassment, or harassment based upon any other applicable protected characteristic; copyright infringement; or any other unlawful activity. Email shall also not be used in a manner that is inconsistent with the diocesan standards of conduct, as set forth in the relevant clergy or lay personnel policy materials.
  
- C. Purpose of Email Retention Policy: The purpose of having email provisions in the Document Retention Policy for the Diocese is to promote efficiency, reduce costs, and to assist the Diocese in its day-to-day operations. Authorizing deletion of unnecessary

electronic records will conserve valuable computer storage space and improve the efficient management of the Diocese's affairs.

- D. Scope: All emails on the diocesan server will be archived by the IT Department, and maintained for a period of four years from the date of creation of the email. Once archived emails have been stored for a period of four years, those emails will then be deleted from the archiving system, unless otherwise directed by the Bishop or his designee (for reasons including, but not limited to, the need to delay destruction of the email records due to pending litigation).

### 5.7 Confidential Canonical Files (*Archivum Secretum* — Canon 489)

- A. File Types: Pursuant to the Code of Canon Law, the Diocese is to maintain a separate grouping of files with documents that are of canonical value or great sensitivity and which need to be kept in conditions of maximum care and security.

Contents of the Confidential Canonical Files include:

- Documents of canonical penal cases;
  - Documents pertaining to dispensations granted from occult marriage impediments in the internal but non-sacramental forum;
  - Documents pertaining to marriages celebrated secretly;
  - Documents pertaining to canonical warnings or admonitions;
  - Documents that are part of a preliminary investigation for a canonical penal process that was closed without formal trial; and
  - Documents relating to other matters that the Bishop deems to be of greater sensitivity and necessary for confidential retention pursuant to the Code of Canon Law, because dissemination or revelation of the contents could seriously damage an individual's reputation or cause scandal within the community.
- B. Access to Files: Consistent with Canon Law, only the Diocesan Bishop shall have the authority to access the secure file room, but may designate those persons authorized to enter the secure file room on his behalf.

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**DIOCESE OF SACRAMENTO – 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. Insurance Records
8. Legal Files and Papers
9. Miscellaneous
10. Payroll Records
11. Pension Records / Supporting Employee Data
12. Personnel Records (Clergy)
13. Personnel Records (Lay Employee)
14. Criminal Background Check Records
15. Plant and Property Records
16. Publications
17. Sacramental Records
18. Safety and Environmental Records
19. School Department / School-Related Records
20. Tax Records
20. Tribunal
21. Emails



<b>Record Type</b>	<b>Retention Period</b>
<b>1. Accounting and Finance</b>	
<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
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	3 years
Receipts	7 years
Mortgage payments	7 years
<i>Banking records</i>	
Bank deposits, slips	7 years
Bank statements, reconciliations	7 years
Cancelled checks, general	7 years
Cancelled checks, important payments	Permanent
Check registers / stubs	7 years
<i>General records</i>	
Audit reports	Permanent
Balance sheets, annual	Permanent
Balance sheets, monthly/quarterly	1 year
Budgets, approved / revised	2 years
Financial reports, annual	Permanent
Financial reports, monthly	1 year

<b>Record Type</b>	<b>Retention Period</b>
Financial statements	Permanent
<b><i>Investment</i></b>	
Bonds, cancelled	7 years from date of cancellation
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
<b><i>Other Financial Records</i></b>	
General ledger / annual	Permanent
Journals, general and specific funds	Permanent
Journal entry sheets	7 years
Ledgers, subsidiary	7 years
Pledge registers / ledgers	7 years
Permanently restricted gift documents	Permanent
Temporarily restricted gift documents	7 years after meeting restrictions
<b>2. Administrative Records (corporation sole / parish)</b>	
Annual reports to the Chancery ( <i>Status Animarum</i> )	Permanent
Annual reports to the diocese / parish	Permanent
Articles of incorporation and bylaws	Permanent
Bequest and estate records (wills, e.g.)	Permanent
Board / board committee minutes	Permanent
Census records	Permanent
Correspondence, official (regarding diocesan/parish policies, directives)	Permanent
Correspondence, routine	Review / destroy biannually
Donor lists	Permanent

<b>Record Type</b>	<b>Retention Period</b>
Endowment decrees	Permanent
Finance Council minutes	Permanent
Historical file (newspaper clippings, photos, etc., regarding history of diocese/parish)	Permanent
Inventories of property and equipment	Permanent
Leases of any types	7 years after expiration of lease term
Liturgical ministers' schedules (altar servers, lectors, Eucharistic ministers, etc.)	Retain until superseded
Mass intention records	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
Pastoral council constitutions	Retain until superseded
Pastoral council minutes	Permanent
Priest personnel board minutes	Permanent
Photographs (relating to diocesan/parish history, clergy, parishioners)	Permanent
Policy statements	Permanent
Religious education reports	Permanent
Rosters of parishioners / parish directories	Permanent
Wills, testaments, codicils	Permanent
<b>3. Cemetery Records</b>	
Account cards	Permanent
Annual report	Permanent
Bank statements	7 years
Board minutes	Permanent

<b>Record Type</b>	<b>Retention Period</b>
Burial cards (record of the interred's name, date of burial, and related information)	Permanent
Burial records (record of interred's name, date of burial, etc.)	Permanent
Contracts documenting lot ownership	Permanent
Correspondence	2 years (assess whether record has historical, legal, or fiscal value)
Deeds / cemetery ownership records	Permanent
General ledger	Permanent
Maps of lots / burials	Permanent
<b>4. Confidential Canonical Files</b> <i>(Archivum Secretum – Canon 489)</i>	
All files	Retain for period prescribed by the Code of Canon Law, up to a maximum of 10 years
<b>5. Contracts</b>	
Contracts and related records	7 years after final performance under the contract
<b>6. Correspondence and Internal Memoranda</b>	
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
Correspondence or memoranda pertaining to non-routine matters, or having lasting or significant consequences (such as letters explaining diocesan policy)	5 years

<b>Record Type</b>	<b>Retention Period</b>
<b>7. Insurance records</b>	
<i>Policies</i>	
Insurance policies — active	Permanent
Insurance policies — cancelled	Permanent
<i>Claims files</i>	
Workers compensation claims files	10 years after close of matter
Tort / contract claim (no litigation)	7 years after last correspondence or contact with claimant
Disability claims files	7 years after return to work, retirement, or death
<b>8. Legal Files and Papers</b>	
Correspondence, legal	10 years
Legal opinion / memorandum	10 years
<b>9. Miscellaneous</b>	
Policies / procedures manuals	Permanent
<b>10. Payroll Records</b>	
Payroll journals	7 years
Payroll registers, summary schedule of earnings, deductions, and accrued leave	7 years
Payroll/earnings records (timesheets, ADP master payroll reports, payroll deduction authorizations)	7 years
<b>11. Pension Records / Supporting Employee Data (maintained by Plan Administrator)</b>	
Pension records / vesting files	For lifetime of plan
Retirement benefits records	For lifetime of plan
Pension payment records	For lifetime of plan

<b>Record Type</b>	<b>Retention Period</b>
<b>12. Personnel Records (Clergy, Religious, Seminarians)</b>	
<i>Incardinated Clergy</i>	
Personnel file (including confidential medical & personal information and canonical/sacramental subfiles)	Permanent during life of incardinated presbyter or deacon; retain only the Clergy Data / Assignment sheet after death
Correspondence file	2 years after death of incardinated presbyter or deacon
<i>Non-Incardinated Externs and Religious</i>	
Personnel file (including confidential medical & personal information and canonical/sacramental subfiles)	Permanent during life of the extern or religious; retain only Data / Assignment sheet after death
Correspondence file	2 years after death of extern or religious
<i>Seminarians / Deacon Candidates</i>	
Personnel file (including confidential medical & personal information and canonical/sacramental subfiles)	<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 departure from the program are to be maintained for 25 years. All other materials contained in the personnel file are to be retained for 7 years.</p>
Correspondence file	<p>Until ordination – then maintain and follow schedule for incardinated clergy</p> <p>If not ordained - 7 years</p>

<b>Record Type</b>	<b>Retention Period</b>
<b>13. Personnel Records (Lay Employees)</b>	
<i>General records</i>	
Attendance records (time cards, time sheets)	7 years
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
Payroll/earnings records (timesheets, ADP master payroll reports, payroll deduction authorizations)	7 years
Personnel file	7 years after end of employment
Vacation / sick leave records	7 years after end of employment
Termination 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	5 years
Employee medical complaints	5 years
Employee medical records (confidential)	5 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 form	3 years after end of employment

<b>Record Type</b>	<b>Retention Period</b>
<b>14. Criminal Background Check Records</b>	
Records concerning ongoing volunteers at parishes, schools, or other diocesan ministries	Continuous, until volunteer services permanently cease (see below)
Records concerning volunteers who leave the geographic territory of the Diocese or otherwise give notice of their intent to cease any further volunteer services with any diocesan organization or ministry	Destroy upon cessation of volunteer work
Records concerning ongoing employees at diocesan workplaces	Continuous, until employee separates and will not be providing volunteer services (see below)
Records concerning employees who separate from employment with the Dioceses (for any reason) and who provide notice of their intent not to serve in any volunteer capacity with any diocesan organization or ministry	Destroy upon separation from employment
Records concerning clergy or religious assigned at any parish or diocesan workplace.	Continuous, unless the individual leaves the service of the Diocese or otherwise ceases to engage in ministerial services.
<b>15. Property / Physical Plant Records</b>	
Abstracts, deeds	Permanent
Architectural records, blueprints, building designs, specifications	Permanent
Architectural drawings	Permanent
Deeds and supporting files	Permanent
Mortgage documents	Permanent
Property appraisals	Permanent
Real estate surveys/plots, plans	Permanent
Title search papers and certificates	Permanent
Property inventory lists	7 years



<b>Record Type</b>	<b>Retention Period</b>
<b>16. Publications</b>	
Anniversary books	Permanent (at least one copy)
Annual reports to the diocese/parish	Permanent
Diocesan directories	Permanent
Newsletters of the diocese/parish or affiliated organizations	Permanent
Parish directories	Permanent
Parish bulletins	Permanent
<b>17. Sacramental Records</b>	
Baptism register	Permanent
First Communion register	Permanent
Catechumen register	Permanent
Confirmation register	Permanent
Marriage register	Permanent
Marriage case files	Permanent
Sick call register	Permanent
Death register	Permanent
<b>18. Safety and Environmental Records</b>	
Accident / injury reports	5 years from end of year in which occurrence took place
Environmental test records/reports	Permanent
Hazardous exposure records	Permanent
Toxic substance exposure records	Permanent
<b>19. School Department / School-Related Records</b>	
<i>Administrative records</i>	
Accreditation files	Permanent

<b>Record Type</b>	<b>Retention Period</b>
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
Booster club minutes	Permanent
Class lists	Permanent
Class schedules	Retain until superseded by new schedule
Faculty meeting minutes	Retain until next accreditation cycle, then destroy
Field trip forms and permission slips	3 years after date of event/trip
Fingerprint information (employees and volunteers)	
Grade report cards and 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)
Library schedules	Retain until superseded
Newsletters (to parents, school community)	Retain until next accreditation cycle, then destroy
Parent-teacher conference files	Retain until superseded
Parent-Teacher Organization minutes	Permanent
Private School Affidavit	Permanent
Promotion lists	Retain until superseded
Reading Group lists	Retain until superseded
Retention lists	Retain until superseded
Scrapbooks	Permanent
Subject files	Annual review then destroy
Teacher's attendance register	Permanent
Textbook inventory	Retain until superseded
Yearbooks	Permanent

<b>Record Type</b>	<b>Retention Period</b>
<i>Student records</i>	
Academic dismissal	Permanent (record on cumulative file)
Accident Reports	5 years
Administration of Medication forms	Retain 1 year after transfer
Admission contracts	Retain in general school file (not in cumulative); destroy 6 months after cumulative file has been transferred to next school (do not forward to next school)
Application, registration, and enrollment records	Retain until end of current school year
Attendance Information: 1. Record of Number of Days Absent and Times Tardy 2. Written Absence and/or Tardy notes, dated and signed by parents. 3. Absentee Registers (daily attendance recorded in legal register provided) 4. Sign-in, Sign-out sheets (for Preschool, Extended Care and regular school day)	1. Permanent (reported on cumulative file) 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 on cumulative file
Child Abuse Reporting Form	Retain in a confidential separate school file permanently (*if the Administrator is aware of Report)
Child Custody Records	Permanent; record in cumulative file
Detention (Notice of Detention to parents)	Retain if behavior pattern persists, otherwise destroy

<b>Record Type</b>	<b>Retention Period</b>
Discipline data	Retain as long as student is enrolled in school
Emancipated Student	Permanent; retain in cumulative file.
Emergency cards	Retain most current card in general school file; destroy previous cards
Expulsion	Permanent; record on 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
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
Pregnancy	Destroy after 3 years, or after age 18
Referral of student to public agents or counselors	3 years
Restraining Orders	Retain in file until transfer of student

<b>Record Type</b>	<b>Retention Period</b>
Sports Participation Forms	3 years after conclusion of season for the sport to which form applies
Standardized test results 1. Student record label  2. Copy of student report for tests administered while student attended school	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)
<b>20. Tax Records</b>	
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
<b>21. Tribunal Records</b>	
Judicial cases	Permanent
Administrative cases	Permanent
Dispensations and permission	Permanent
Sanations	Permanent

Record Type	Retention Period
<b>21. Emails</b>	
Emails stored on the diocesan server	4 years 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 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

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