Records Retention Guidelines for WCMC Departments

To assist department staff and faculty with decisions related to record retention, the Medical College has compiled the following guidelines. These guidelines are based on Cornell University's policy regarding the retention and management of different types of records. While the Cornell University policy excludes Weill Cornell Medical College, underlying principles and methodology were reviewed and approved by the WCMC Human Resources and Finance Departments and the Office of University Counsel. These guidelines aim to ensure that necessary records are adequately maintained and that records no longer needed or of value are discarded at the appropriate time.

Each department should periodically review its records to determine whether they should be retained or discarded in accordance with these guidelines. Departments may choose to exceed standards for retention periods but any deviations below the minimum retention periods may be implemented only after approval by the Legal and/or other appropriate department.

It is the policy of the Medical College to meet or exceed all applicable statutory or regulatory requirements for the retention of business and financial records, and to maintain retention practices that are in accordance with generally accepted accounting principles.

Any questions regarding the maintenance of documents that have been retained for the standard period but that may be valuable to Weill Cornell Medical College or its departments should be directed to the Human Resources, Legal, Finance, and Academic Affairs Departments and/or to the individuals listed under “Contacts.”

Custodians of records must ensure that information in confidential or privacy-protected records is protected from unauthorized disclosure through the ultimate destruction of the information. The purpose of disposal or destruction is to permanently remove records from active use while maintaining the confidentiality of the protected health information they may contain. There must be no possibility that the information could be reconstructed. Normally, destruction of such records will be executed by shredding (preferably cross-shred), pulping, burning, or pulverizing. “Deletion” of such records in compute files or any other electronic storage media is not acceptable. Electronic records must be “wiped” clean (degauessed) or the storage media physically destroyed.

Records and Documents Categories
We have identified several major categories: patient clinical records, patient billing, accounting/finance, personnel/payroll, research records, and historical documents.

Accounting/Finance Records:
WCMC adheres to the Cornell University record retention policy for all financial records. The Finance Office maintains all official records for a period of 6 years. Please note that Finance will maintain only the documentation that typically passes through their offices (ex. check requisitions, purchase orders, cash receipts, travel reimbursements, deposits,
financial reports, budget submissions, etc.) Grant accounting will maintain records for 7 years after last agency audit. Departmental duplication of this is not legally necessary. For auditing purposes, the records maintained by Finance are the official records. Furthermore, the audit department will not review any departmental records older than 3 years. Departments should retain their active finance record for at least 1 year for verification of transactions against official financial reports, and for convenience. In the event of a legal dispute involving a contract, all financial records should be maintained until the legal dispute is finally resolved. The following types of documentations should be retained for longer periods of time:

**Specific Documents**

- External and internal audit reports - Permanently
- Contracts and leases - 6 years after expiration of lease or contract term
- Property records including costs, depreciation reserves, end-of-year trial balances, depreciation schedules, blueprints and plans - Permanently
- Property appraisals by outside appraisers - Permanently
- ePrint reports- Can be accessed on ePrint and a hard copy does not need to be retained. If the department chooses to retain the information, it should be maintained as an electronic file rather than a paper record.
- Petty cash vouchers - 3 years

**Summary:**


All financial documentation should be maintained for at least 1 year but no more then 3 years with the exception of documents specifically listed above.

**Contacts:**

Mark Domaszot, PO Finance 212-835-8552, mad2137@med.cornell.edu  
Derek Spears, WCMC Finance 212-680-7063, ddsppears@med.cornell.edu

**Human Resources Records:**

WCMC policy is that the Human Resources Department maintains all official personnel records, the Payroll Office maintains all official payroll records, and the Office of Faculty Affairs maintains all official appointment records. The following are guidelines regarding retention of specific categories of HR-related information in the departments. Please note that, notwithstanding these guidelines, all documentation regarding employees who are involved in a legal dispute with Cornell should be maintained until the legal dispute has been finally resolved.

Time sheets and time cards for all employees must be kept for a minimum of 3 years.

New hire documentation including logs, postings, reference checks, and resumes of applicants who were not hired must be retained for at least 1 year from the date that
employee was hired. New hire documentation for faculty recruits must be maintained for at least 2 years from the hire date regardless of whether the faculty member is active or inactive.

Appraisals of active employees should also be maintained for easy reference by supervisors. Appraisals for terminated employees should be disposed of as they are a part of the formal HR record maintained by the HR department. Prior to disposal, departments should review their appraisal paperwork and forward any informal documentation (i.e., documentation that was used to support a formal warning/praise) to HR-Employee Relations for inclusion in the formal record. Once a copy is sent to HR, the department can discard the document.

PAFs and salary information are part of the formal HR record and should be maintained by the departments for active employees only. Once the employee is terminated, the PAFs may be discarded. Furthermore, all payroll records are maintained by the finance department. Departments should not retain copies of any payroll documentation.

Information regarding disability, maternity, or any other leave of absence is part of the formal HR record and is maintained by HR-Employee Relations. It does not need to be maintained by the departments. Information regarding visas or any other immigration issue is part of the formal HR record and is maintained by HR-Immigration. It does not need to be maintained by the department. If specific information is needed, the department can contact employee relations or HR-Immigration for copies of the records.

Summary:
Maintain personnel files on all active faculty and staff.
Original timesheets/time cards should be maintained for 3 years.
New hire paperwork for staff must be maintained for 1 year from date of hire.
New hire paperwork for faculty must be maintained for 2 years from date of hire.
All documentation regarding employees who are involved in a legal dispute with Cornell should be maintained until the legal dispute is resolved.

Contacts:
Thomas Blair, Associate Director, Employee Relations 212-746-2190,
thb2002@med.cornell.edu
Valerie Grubman, Human Resources, Records Manager
Jeanie Huang, Human Resources, Immigration Manager 212-746-1033,
mjch2003@med.cornell.edu

Research Records:
There is no specific college policy on the number of years that investigators must retain research records. The standard and common practice is to maintain records as long as the investigator deems it necessary to defend against any claim of scientific misconduct.
(Refer also to Page 11.16, chapter 1 section B 4 – Data retention, RASP Guide to Rules and Regulations Concerning the Conduct of Research, 5th Edition – 1998.)
All research data from studies conducted by the faculty and employees of WCMC in the course of employment or through the use of University equipment or facilities are the property of Cornell University. As such, WCMC will provide storage for all research records through the RASP office. The department must pack records in storage boxes; clearly label boxes with the name of the Principal Investigator, description, and numbering system (for easy retrieval); and contact RASP to arrange for pick-up, storage, and future access to files.

In accordance with Federal regulations at 45 CFR 46.115(b), IRB records must be retained for no less that 3 years after the completion of the research.

**Summary:**
Investigators are to store inactive research records off-site in storage space provide by the RASP office.

**Contacts:**
Harry M. Lander, PhD, MBA, Associate Dean, Research Administration, Office of Research and Sponsored Programs, 212-746-5979, hmlander@med.cornell.edu

**Patient Health Information and Billing Records:**
For adult patients, PO members must maintain clinical patient records for a minimum of seven (7) years from the last contact with the patient. Records for minors and obstetrics patients must be maintained through age twenty-one (21) of the child or seven (7) years from the last date of service, whichever is longer. In the event a patient has filed a lawsuit against Cornell, NYPH, or a physician, the records should be maintained until the lawsuit is resolved. An electronic scan of the entire paper record would meet the retention requirement, provided that the technology to access the records is maintained for the applicable period of time. Therefore, to avoid confusion, groups that go through a retrospective scanning process should promptly destroy their charts once they are electronically stored in Epic. It is important to note that the department is ultimately responsible for the patient records; therefore, the departmental staff is responsible for performing a quality control review prior to destroying any paper records. This is typically done by auditing selected scanned charts and reviewing in detail all scanned chart manifests. Any group that is interested in scanning its clinical records should contact POIS to discuss the possible options.

Patient billing records, including all batches, should be retained for seven (7) years. All information contained in a batch, including super-bills, inpatient/surgery charge cards and logs, batch control forms, cash and credit card payment logs, and copies of checks, must be retained.

**Summary:**
Adult patients: records must be retained for 7 years from last encounter.
Pediatric patients and OB: records must be retained until age 21 of the child or 7 years from last encounter, whichever is longer.
Patient billing records must be retained for 7 years.
Contacts:
Legal – Michael Smith, Associate University Counsel (212) 746-0463
POIS – Curtis Cole, MD, Director of POIS (212)-746-0471
POBO – Ann Adenbaum, Director of POBO (212) 590-5780
Scanning – Svetlana Lipyanskaya, POIS (212)746-0241, svt2002@med.cornell.edu

Faculty Affairs Records:
The Office of Faculty Affairs retains indefinitely all the records that are submitted by the departments. Typically such records contain documents related to appointment, promotion, and tenure actions of all academic staff. Departments may maintain their own copies of such documents.

Contacts:
The Office of Faculty Affairs 212-746-6329

Legal Records:
The Office of the University Council maintains legal documents that it generates or for matters on which they have worked. Typically such records include: consent orders, court orders, judgments, releases, settlements, and legal correspondence. Departments may choose to maintain their own copies of such documents. Departments generally retain the originals of any contracts they generate, and should maintain those contracts for a period of six years after the contract has ended and all payments have been made. Documents related to legal malpractice claims are maintained by the NYPH Legal Affairs and Risk Management Office.

Summary:
Documentation for any contract generated by a department must be retained for 6 years after the contract has ended.

Contacts:
The Office of University Counsel WCMC Office (212) 746-0463

Historical Documents:
Any inactive departmental records that have historical value should be referred to The Medical Center Archives (Mail Box 34), the official records repository for Weill Cornell Medical College, Weill Cornell Graduate School of Medical Sciences, and NewYork-Presbyterian Hospital/Weill Cornell Medical Center.

In accordance with long-standing archival policy, all departments, divisions, offices, and units are requested to send copies of any records, paper-based or electronic, that have enduring value to the Medical Center Archives. These records include, but are not limited to, the following items: annual reports, biographical information of faculty and staff, any information pertaining to the history of the Medical College and its facilities, announcements, booklets, brochures, bulletins, calendars, catalogs, directories, flyers,
guides, handbooks, invitations, journals, magazines, manuals, newsletters, pamphlets, programs, and yearbooks.

Sending the records to the archive does not mean that the department should not retain a copy of the items for its own records. All records sent to the archives become archive property and are then available for viewing by appointment only. For any large transfer, please contact the archive staff in advance to ensure that adequate space and resources will be available to process your shipment.

Summary:
3 copies of any records of enduring value should be sent to the Medical Center Archives. Departments should retain copies of any above mentioned documents that they deem necessary.

Contacts:
Medical Center Archives: 1300 York Ave #34; New York NY 10065-4896, http://www.med.cornell.edu/archives
Jim Gehrlich, Head of Medical Center Archives, 212-746-6072.
Elizabeth Sheppard, Assistant Archivist, 212-746-6072, mems2001@med.cornell.edu

Additional Information:
Departments can refer to the Cornell University's Retention of University Records Policy Statement found on the University's policy web pages at:

Departments also should review NYPH retention policy found at:
Policy on disposal is at: