



# Diocese of Columbus Records Retention Schedule

**Current Version effective June 27, 2023**

## Diocesan Records Retention Schedule & Safekeeping

For all types of records required to be retained by these policies, the following is the policy for safe-guarding those records:

- All records will be retained in a safe and secure place
- All records will be kept on the premises of the entity and not stored in the home of an employee or other person, nor in a separate location that makes access to the records impractical

Where it is more practical than retention in paper format, records may be retained in image format (i.e. scanned, on microfiche) as long as the original paper copies are not needed for legal purposes. The image media are then subject to the same safekeeping and retention policies in this section.

The record retention policies are defined in the following sections:

- Administrative records
- Bishop’s Office/Chancery Office
- Cemetery Records
- Electronic Records
- Financial Records
- Historical Records
- Human Resources Records
- Sacramental Records
- Safe Environment Records
- School Records

**The following defines the types of records and time period they are to be retained:**

### **A. Administrative Records**

<b>Record Type</b>	<b>Retention</b>
Annual reports to the Chancery (Status Animarum)	Permanent
Annual reports to the diocese/parish	Permanent
Annual reports to agencies and other entities	Permanent
Articles of incorporation and bylaws	Permanent
Architectural drawings	7 years after property alienation
Architectural records, blueprints, building designs, specifications	7 years after property alienation
Articles of incorporation, bylaws, etc.	Permanent
Asbestos abatement	Permanent
Bingo – annual license application and other information, including financial records	7 years
Building construction contracts & supporting documents	12 years
Building easements & related documents	7 years after property alienation
Building & equipment specifications and changes	7 years after property alienation
Building furniture & equipment inventory records	7 years after disposal
Building maintenance & repair records	15 years
Census records	Permanent

Copyright files and registrations	Permanent
Constitutions and bylaws	Permanent
Contracts, inactive	15 years after termination
Court documents and records	Permanent
Correspondence, legal	Permanent
Correspondence, official	Permanent
Correspondence, routine and general	7 years
Damage & theft reports	7 years
Deeds & related files	7 years after property alienation and expiration of deed restrictions if those exist
Diocese/Parish organization records (minutes, correspondence, publications, etc.)	Permanent
Donor lists	Permanent
Endowment decrees	Permanent
Finance Council minutes	Permanent
Forms, original copies of	Until revised
Fundraising – correspondence & records	15 years
Furniture and equipment warranty and repairs, including maintenance records	15 years
Gifts (restricted) - documents	Permanent
Grant records & all related materials	7 years after completion of grant period or applicable tax filing, whichever is longer
Historical file (e.g. newspaper clippings, photos, etc. related to the Diocese; also note that for central offices, media files are maintained by the Communications Office).	Permanent
Parish/diocesan history books	Permanent
Parish organizations, including separate incorporations	Permanent
Insurance claims for loss, damage, accident reports, appraisals	7 years
Insurance policies – active	Permanent
Insurance policies – cancelled	Permanent
Inventories of property, equipment, other moveable goods, and goods of precious or significant value	7 years after property has been disposed – some suggest permanent
IRS exemption determination letters, for organizations other than those listed in The Official Catholic Directory	Permanent
Leases	15 years after lease expiration – some suggest 7 years after expiration
Legal – claims and litigation	Permanent
Legal – wills, bequests, endowments, trusts, testaments, codicils	Permanent
Licenses and permits	Until revised
Liturgical minister schedules	Retain until superseded
Mass Intention books	2 years after intentions have been satisfied
Mortgage documents	7 years after property alienation and expiration of deed restrictions if those exist
Office files	Selective retention – retain

	those that document diocesan/parish administration and activities
OSHA safety records (including 300 log, privacy case list, annual summary, and OSHA 301 incident report forms)	7 years following the end of the last year to which the records relate
Parish Bulletins	Permanent
Parish Council constitutions	Retain until superseded
Parish Council minutes	Permanent
Pest management plans	3 years
Photographs relating to diocesan/parish history, clergy, parishioners, etc.	Permanent
Policy statements	Permanent
Project records	15 years after completion (unless longer dictated by contract)
Property appraisals	Permanent
Property deeds & supporting documents	Permanent
Property title search information	Permanent
Publications of the Diocese (Catholic Times, newsletters, etc.)	Permanent
Real estate surveys/plots/plans	7 years after property alienation and expiration of deed restrictions if those exist
Religious education reports to diocesan offices	Permanent
Rosters of parishioners/members/students (confidential and must be kept under lock and key if they contain birth dates, Social Security numbers, license numbers, and any other personally identifying information)	Permanent
Safety training records	7 years
Sports/athletic program files	4 years
State tax exemption certificates	Retain until superseded by a new certificate
Title search papers and certificates	7 years after property alienation and expiration of deed restrictions if those exist
Toxic substance exposure records	30 years
Trademark files and registrations	Permanent
Zoning documents and restrictions	7 years after property alienation and expiration of deed restrictions if those exist

## **B. Bishop's Office/Chancery Office**

<b>Record Type</b>	<b>Retention</b>
Clergy files, active & deceased	Permanent
Clergy photo directories	Permanent
Episcopal calendars	Permanent
Episcopal correspondence	Permanent
Episcopal decrees	Permanent
Episcopal communications regarding agencies and other entities	Permanent
Episcopal homilies that are written	Permanent
Event/retreat planning documentation	7 years
Movements and organizations	Permanent
Policy statements	Active until superseded; all copies

to be archived for historical purposes

Publications (clergy bulletins, newsletters, etc.)

Permanent

### C. Cemetery Records

Record Type	Retention
Annual financial reports	Permanent
Bank deposits	7 years
Bank statements	7 years
Board or advisory council minutes	Permanent
Building contracts & warranties	Permanent
Burial permit (ORC 3705.17)	5 years
Correspondence	Review and discard biannually; or, if applicable, file correspondence in accordance with other provisions of this policy.
Cremation certificate	7 years
General ledger	7 years
Lot maps	Permanent
Lot records (which may also be called burial or lot cards, burial records, lot books, ledgers, or interment records, and includes the deceased name, place of death, date and location of the interment, entombment or inurnment, and any related documents such as contracts, invoices, payments, obituary, surviving heirs, and disinterments)	Permanent
Location of utilities records	Permanent
Right of burial records (which may also be called account cards, deeds, or easements, and includes interment, entombment or inurnment right owners, lot location and description, burial designation, transfer of ownership records, and other purchase details)	Permanent

**Per Ohio Cemetery Dispute Resolution Commission and Ohio Revised Code (Section 1721):** Electronic or paper cemetery records pertaining to interment, entombment or inurnment right owners and interment, entombment or inurnment records indicating the deceased name, place of death, date and location of the interment, entombment or inurnment should be maintained in the cemetery's office. Paper copies of records required for the verification of interment, entombment or inurnment rights and cemetery interment, entombment or inurnment records as indicated above should be maintained in a fireproof container within the cemetery office. If possible duplicate copies of all cemetery records should be maintained off-site. It is permissible to maintain records in an electronic format so long as the electronic copies are true copies of all the original documents.

### D. Electronic Records

- The term “electronic record” means any record that is created, received, maintained, or stored in Diocesan, Parish, Agency, School, or other affiliate workstations or central servers (Diocesan/affiliate). Examples include, but are not limited to email, Web files, text files, PDF documents, word processing documents, spreadsheets, databases, database data, backup tapes, and other formatted files.

- The legal custodian of an email message or an electronic document is the Diocesan/affiliate employee who originates the messages or to whom the email message or electronic document is sent. If the record is transferred, by agreement or policy, to another person for archival purposes, then that person becomes the legal custodian.
- It is the policy of the Diocese and its affiliates that electronic records must be managed in the same manner as traditional records to ensure compliance with state and federal regulations and to preserve institutional history. In the event of litigation or notice that litigation is imminent, litigation hold policies will apply to electronic documents as well as paper documents.
- The majority of parishes, schools, agencies, and institutions use a technology-based system for accounting, census and payroll. The following is the policy for backup, retention and safekeeping of these records:
  - A backup will be taken of **each** system daily (for systems with a high volume of transactions) or weekly (for systems with a low volume of transactions)
  - Once per week, the backup will be copied to a separate backup device (i.e. CD, memory stick, etc.) and moved to a fireproof storage device. The weekly backup will be retained for 3 weeks.
  - An annual backup will be made of the **Census** system at the end of the calendar year to a separate backup device (i.e. CD, memory stick, etc.) and moved to a fireproof storage device. This backup will be retained permanently.
  - An annual backup will be made of the **payroll** system at the end of the calendar year to a separate backup device (i.e. CD, memory stick, etc.) and moved to a fireproof storage device. This backup will be retained for 7 years.
  - An annual backup will be made of the **accounting** system at the end of the fiscal year to a separate backup device (i.e. CD, memory stick, etc.) and moved to a fireproof storage device. This backup will be retained permanently.
  - If a conversion is performed to a new accounting, Census or payroll system, a backup will be made of the old system at the time of conversion to a separate backup device (i.e. CD, memory stick, etc.) and moved to a fireproof storage device and retained permanently.
  - All backups are to be retained on-premises in a fireproof storage device (i.e. file cabinet, safe, etc.).

## E. Financial Records

Record Type	Retention
1099 forms	7 years
Accounting records – disbursement journal/register, receipts journal/register	7 years
Accounts payable invoices	7 years
Accounts payable ledgers *	7 years
Accounts receivable ledgers *	7 years
Audit Reports	Permanent
Balance Sheet – monthly/quarterly *	7 years
Balance Sheet, Annual *	Permanent
Bank Deposits	7 years
Bank reconciliations	7 years
Bank Statements	7 years
Bonds, cancelled	7 years after date of cancellation
Budgets – approved/revised	7 years
Cancelled checks or image copy	7 years
Cash books	Permanent
Cash journal, receipts on offerings and pledges	Permanent

Cash books/journals	Permanent
Certificates of Deposit, cancelled	7 years after redemption
Chart of Accounts	Permanent
Check register/stubs	7 years
Credit card authorization information (card number, expiration date, and cardholder's signature). <i>All Credit Card information should be kept secure, with only authorized employees having access.</i>	6 months following the last charge against that card
Credit card statements/charge slips	7 years
Depreciation schedules	Permanent
Documents substantiating fixed asset additions	Permanent
Expense reports	7 years
Financial reports – annual	Permanent
Financial reports – monthly/quarterly	7 years
Financial Statements	Permanent
Form 990	Permanent
General ledger – annual	Permanent
Gift documents, permanently restricted	Permanent
Gift documents, temporarily restricted	7 years after the restriction expires
Invoices and paid bills, general accounts	7 years
Invoices and paid bills, major construction	Permanent
IRS exemption determination letters for organizations other than those listed in the Official Catholic Directory	Permanent
IRS revenue agents' reports	Permanent
Journal entries	7 years
Journals, general and specific funds	Permanent
Ledgers – subsidiary	7 years
Letters of credit	7 years after expiration
Loan documents	7 years after final payment
Mortgage payments	7 years
Mortgage records	Permanent
Notes receivable from the Diocese	7 years after redemption
Notes payable to the Diocese	7 years after cancellation
Payment records	7 years
Payroll change actions	4 years
Payroll journals	7 years
Payroll registers, summary schedule of earnings, deductions and accrued leave	7 years
Payroll taxes – federal withholding, FICA, & Medicare taxes paid	7 years
Payroll taxes – Ohio income taxes paid	7 years
Payroll taxes – municipal income taxes paid	7 years
Pension records	Permanent
Pledge registers/ledgers	Permanent
Property taxes paid	15 years
Purchase orders	7 years
Receipts	7 years
Sales records	7 years
Securities sales	7 years after sale
State tax exemption certificates (income, excise, property, sales/use, etc.)	Permanent
Stock investment	7 years after sale
Stop payment orders	7 years

Tax shelter annuities withheld & paid	7 years
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**F. Historical records**

\* All historical records of the Diocese of Columbus (at the diocesan and not parochial level) are to be archived at the Chancery Office or other locations authorized by the Chancellor.

<b>Record Type</b>	<b>Retention</b>
Appointment letters for parish staff	Permanent
Authentication and supporting documents for relics	Permanent
Chronicle of events or parish calendar	Permanent
Clergy card files	Permanent
Clergy personnel files	Permanent
Confirmation register	Permanent
Deceased clergy files	Permanent
Diocesan decrees and correspondence relating to parish boundaries	Permanent
Diocesan entity history files	Permanent
Donation records for significant parish furnishings	Permanent
Historic parish and school correspondence, program documents, etc.	Permanent
Parish bulletins and newsletters	Permanent
Parish finance council by-laws, minutes, reports, officer roster	Permanent
Parish organizations' minutes, reports, rosters	Permanent
Parish pastoral council by-laws, minutes, reports, officer roster	Permanent
Parish videos or DVDs documenting parish history	Permanent
Photographic files – historic events, parish activities, etc.	Permanent
Sacramental records recordings (microfilm, scans, etc.)	Permanent
Sacred objects documentation, e.g. altars, statues, pews, sacred vessels, stained glass, etc.	Permanent
Status Animarum reports and addenda	Permanent

**G. Human Resources Records**

Personnel files must be maintained for active and inactive employees according to the schedule listed in this section. These records are the property of the Diocese of Columbus and are confidential and to be made available only to diocesan/parish representatives with a legitimate right to know, unless their disclosure is compelled by some legal action.

A human resource file is to be maintained for each active diocesan/affiliate employee. That file should contain the following to the extent that any of the following documents exist:

- Employee application
- Resume
- Reference letters
- Test documents
- BCII Report (Ohio Bureau of Criminal Investigation & Identification – note that these are retained permanently by the Safe Environment Office)
- FBI Report (Federal Bureau of Investigation – if required by the specific position – note that these are retained permanently by the Safe Environment Office)
- Employment Authorization Form (Form I-9)
- Salary information
- Job description
- PTO leave taken and accrued (currently document in the Paycor system)
- Performance evaluations

- Records of disciplinary actions
- W-4 form
- Employee contracts or Letter of Understanding (if applicable and approved by the COO)
- New Hire Form
- Pension Enrollment Form
- Official transcripts
- Application for all employee benefits plans
- W4 forms
- IT-4 (Withholding Exemption Certificate)
- IT-4 (Statement of Residency in Reciprocity State)
- B.4 Form
- Disciplinary actions
- General correspondence about the employee

The retention period is 7 years after conclusion of employment for the personnel file and the documents listed above. Note that for Diocesan offices, documents are maintained by the Human Resources Office.

Americans with Disabilities Act (ADA) requirements (if applicable): ADA requires that all medical records be maintained separately from personnel records. Thus, every location must maintain a personnel record for each employee that contains only medical records. The retention period for certain documents may vary, in accordance with the remainder of this policy:

- Notices of reasonable accommodation
- Physical examinations
- Fit for Duty statements for extended absences
- FMLA reports and other FMLA documents
- Medical records used in disciplinary or dismissal hearings
- Medical statements for insurance claims
- Medical exams ordered by administration
- Pre-employment examinations
- Reasonable cause drug test
- Request for leave for medical reasons
- Request for return to work following a leave for medical disability
- Request for maternity/paternity leave of absence

These records are confidential and should be made available only to Diocesan/affiliate representatives with a legitimate right to know, unless their disclosure is compelled by some legal action. In Ohio, employees and former employees have the right to access certain information, such as at least the name, address, occupation, pay rate, hours worked for each day worked, and each amount paid for the employee requesting the information, about himself or herself. The Diocesan/affiliate employer may ask that the request be in writing and generally has 30 days to comply with the request.

<b>Record Type</b>	<b>Retention</b>
Accident/injury reports (non-wc)	Termination + 5 years
Applications – rejected	3 Years
Attendance records	Termination + 7 years
Minor Employee Records (age 16)	Termination +2 years
Criminal Background Checks	Indefinite or at least 5 years
Disability records (Reasonable Accommodation)	Termination + 3 years
Employee Benefit Election Forms	Termination + 3 years



Employee contracts/agreements/letters of understanding	Termination + 7 years
Employee evaluations	Termination + 7 years
Employee medical complaints	Termination + 5 years
Employee medical records	Termination + 5 years
Employee salary schedules	Termination + 7 years
Employee Military Leave Records (USERRA)	Permanent
Employment taxes, contributions, and payments including taxes withheld, FICA (W-4, IT-4)	Termination + 7 years
Environmental test records/reports	30 Years from test date
FMLA records (Must be kept separately from other personnel records & documents)	Termination + 7 years
Form 941 Quarterly Federal Tax Withholding Report	4 years after filing 4 <sup>th</sup> quarter for the year
Garnishment requests	Termination + 4 years
Hazardous exposure records	30 years from test date
I-9 records	Termination +7 years
Job announcement	2 years
Pension vesting files	Termination + 50 years
Permanent earnings and records	Termination + 7 years
Personnel files for personnel no longer employed by the Diocese	Termination + 7 years
Retirement benefits	Termination + 50 years
Service records (Employment Record)	Termination + 7 years
Termination records	Termination + 7 years
Time sheets	4 years
Unemployment forms	5 years
W2 forms	4 years
Workers' compensation records	Termination + 30 years

## H. Sacramental Records

The following types of sacramental records are to be retained permanently:

- Baptism Register
- Confirmation Register
- First Communion Register (optional record, but must be retained permanently if the pastor keeps one)
- Death Register
- Marriage Register
  - Prenuptial files are retained for 60 years after wedding.

These records are to be retained in a fire-resistant cabinet or safe, both the current and all prior registers.  
**For a complete overview of the handling of Sacramental records, please refer to the Diocesan Sacramental Records Guidelines booklet.**

## I. Safe Environment Records

Record Type	Retention
Codes of conduct paperwork	7 years after conclusion of employment or volunteer service
Communications about clergy removed from ministry and employees removed from employment	Permanent
Complaint forms/email messages	Permanent
Criminal Background Checks	Permanent

Data Gathering Report and Onsite Audit Instruments	Retain the three most recent instruments; destroy the oldest instrument upon receipt of the corresponding new instrument.
Diocesan safe environment decrees	Permanent
Field trip documentation	7 years
Interim Notifications Regarding Data Gathering Reporting and Onsite Audits	Retain these notices until the notification of final outcome is received; then destroy interim notifications.
Notifications of Final Outcomes of Data Gathering Reporting and Onsite Audits	Permanent
Notifications of Final Outcomes of Data Gathering Reporting and Onsite Audits	Permanent
Parish sex offender agreements (retained at parish level)	Permanent
Personally Identifiable Release Forms	7 years
Record of Adult Permission and Liability	7 years
Record of Parental Consent and Permission	7 years
Requests for exceptions to policy/Criminal Records Analysis	Permanent
Review Board minutes	Permanent
Sign in sheets for <i>Protecting God's Children</i> and VIRTUS International Priests training	Permanent
Summaries from VAC	Permanent
Volunteer applications (parish)	7 years after conclusion of service
Volunteer driver forms (parish)	7 years

**J. School Records – For full details refer to Section 5125.1-2 of the Catholic Schools Policies & Procedures**

<b>Record Type</b>	<b>Retention</b>
ACR form 240 backup info	10 years
Admissions documents	7 years from date of graduation or rejection, whichever is longer
ADM	Permanent
Annual School Reports (State)	Permanent
Approved Course of Study	Until Superseded
Attendance records	Permanent
Auxiliary Services Requisitions and Budgets	7 years
Cafeteria Records	5 years
Curriculum standards	Until superseded
Diocesan and Local Tuition Assistance	7 years
Directory information	Permanent
Education personnel certificates and licenses	7 years after termination
Facility training manuals	Until superseded
Federal program requirements	5 years
Free and Reduced Lunch Applications	4 years
General academic files, including report cards, testing materials, general disciplinary records, parent/student/teacher communications, registration materials	2 years from date of graduation from school; 7 years for not-to-return students; permanent for incarcerated or expelled students
Government programs: federal and state grants	As mandated by government

	agency
Graduate and class ranking lists	Permanent
Grievance records	2 years
Handbooks	Until superseded
Health/Fire Inspections	7 years
Letters of recommendation	7 years from date of graduation or date on letter, whichever is longer
Medical records and information (These records are confidential and should be made available only to Diocesan staff with a legitimate right to know, unless their disclosure is compelled by some legal action.)	7 years from date of graduation
NCEA/CCO reporting	5 years
Official transcripts	Permanent
Official teacher service record	Permanent
Photographs pertaining to school history	Permanent
Preschool Student records	5 years after student leaves preschool
Required school services	3 years after services no longer provided
Scholarship applications, selection committee records, including selection criteria used, and other documentation regarding selection process	3 years
Scholarship recipient information, including names, addresses, and school attending	Permanent
Scholarship document, other – including funding documentation	7 years from date of award
School board agendas/minutes	Permanent
School Calendars	5 years
School Bus Safety Form	5 years
School office files, subject	Selective retention; retain those that document school administration and activities
Standardized test results	8 years
Student and Faculty Handbook	1 year after superseded
Student formal plan – service, written, academic support	Permanent
Student health records	Permanent
Student psychological testing	Permanent
Subject files (correspondence, memos, rules, schedules, etc.)	Annual review; destroy superseded files biannually
Substitute Teacher Records	7 years
Tornado/Fire Drills	7 years
Tuition Fees/ Payments	7 years