

RECORDS RETENTION MANAGEMENT

Policy Number: 207GS

Effective Date: 6/1/16

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Scope

The Policy on Records Retention applies to faculty, staff, predoctoral researchers, summer scholars and applicants ("Covered Individuals") of The Graduate School of the Stowers Institute for Medical Research ("The School").

Purpose

The SGC's records are a vital resource and critical to the achievement of its mission. The records preserve the knowledge created by research activities, assist management in decision-making, and ensure compliance with legal, contractual and ethical obligations. At the same time, failure by the SGC to prudently manage records can result in the inefficient use of time and effort, and potential legal liability if records are not preserved or destroyed in a systematic manner. The SGC has therefore established this Policy and Policy Number 605 (Recording of Scientific Data) and 610R (Records Retention and Management of Scientific Data) to promote economy, efficiency and discipline in the creation, organization, retention, and disposal of records.

This Policy is intended to assist members in determining which records should be kept for prescribed time periods and which records should be destroyed. The Policy should guide members through a periodic review of their file storage (both electronic and hard copy) to preserve important records and dispose of those that have been kept needlessly. Documents that members would routinely dispose of, absent any legal, regulatory or administrative need should continue to be treated in the same manner, even with the implementation of this Policy.

The School is included in the Stowers Group of Companies ("SGC") Organizations and has adopted the following policy as its own.

Policy

Definition of Records

This Policy applies to all records generated or received by SGC Organizations, regardless of the medium or format in which they appear. The term "records" includes all forms of communication in a SGC Organization's possession, custody or control whether they have been reduced to "hard copy," such as paper or film, or which can be retrieved or viewed from electronic or other media, such as computers, smartphones, tablets, drives, disks, or portable storage, and further including electronic mail (including voicemail recordings), instant messages, text messages, social media and other communications and electronic databases.

Current Status of Records

Currently electronic records are stored at the Institute in a variety of ways:

- Local Computer Drives: Documents are stored locally on an individual member's computer hard drive.
- Network Data Shares (including but not limited to H – SGC Home drive/My Documents, K – SGC Common drive, L – SGC Lab drive, S – SGC Core drive, and U – SGC Projects): All data on Network Data Shares are live data, meaning this data can be created, deleted or altered by anyone with appropriate permissions.
- Email
- The current practice for the back-up and retention for electronic records is shown on Schedule A.

General Statement of Policy

Each SGC organization will securely retain all its records for periods prescribed by any and all legal, contractual and ethical obligations, and promptly and consistently dispose of records in the ordinary course of business after they have outlived their respective retention periods. If required by pending or threatened litigation, audits, government investigations or similar proceedings ("triggering event"), the relevant SGC organization will issue a notice suspending the disposal or alteration of relevant records until a release notice is issued ("Records Retention Notice" and "Records Retention Release Notice.") Each Covered Individual is expected to fully comply with this Policy, and any records retention, preservation, or disposal schedules, notices and procedures issued pursuant to this Policy.

Policy Regarding Scientific Records

As previously mentioned, Scientific Data is covered in Policy Number 610R: Records Retention and Management of Scientific Data.

Records Management Program

The SGC's Records Management Program ("RM Program") consists of this Policy and the following additional components:

Records Retention Schedule

The Records Retention Schedule ("Retention Schedule") sets forth the retention periods applicable to each category of the SGC's records. The retention periods shown on the Retention Schedules are mandatory and are based upon the character, content and purpose of the various categories of records, as well as applicable law. Frequently a record will fit into more than one category. In these cases, each record must be retained for the longest retention period applicable to it.

Implementation Procedures

The RM Program will be implemented through standard operating procedures ("SOPs") issued from time to time. Some SOPs apply to the entire SGC, while others are applicable only to specific SGC Organizations or specified departments, divisions or other operating units of a SGC Organization. These procedures will be maintained in the Policy Manual on Helix.

Responsibilities

Records Oversight

The RM Program is developed and guided by the General Counsel Office whose responsibilities include:

- Educating members about the RM Program
- Periodically reviewing the RM Program to determine its efficacy and consistency with the business, research, and administrative needs of the SGC
- Performing audits to ensure ongoing compliance
- Monitoring and reviewing any additions or changes in existing law, ordinance or regulation regarding retention requirements affecting the SGC's records
- Evaluating, and if appropriate, approving, modifying and updating the RM Program
- Approving the issuance of a Records Preservation Notice and a Records Preservation Release Notice upon the occurrence of a triggering event

Corporate Records Manager

The General Counsel or their designee(s) will serve the role of Corporate Records Manager with the following responsibilities:

- Ensuring that records are identified, maintained, organized, filed, retained, inventoried, protected, retrieved, accessed, and/or disposed of in accordance with the RM Program
- Ensuring that inactive records are identified, packaged, and transferred to off-site storage and that those records are retrieved from and returned to storage, in accordance with the RM Program
- Assisting with periodic reviews of the RM Program, routine compliance audits, and implementing approved modifications and updates to the RM Program
- Issuing Records Preservation Notices and Records Preservation Release Notices upon approval
- Reviewing, and if appropriate, approving requests for retention of records beyond their retention periods
- Reviewing, and if appropriate, approving requests for disposal of records whose retention periods have expired
- Reviewing, and if appropriate, approving requests for disposal of records before the retention period expires.

Covered Persons

All Covered Persons are responsible for ensuring that their records are consistently identified, maintained, organized, filed, retained, inventoried, protected, retrieved, accessed and disposed of in accordance with the RM Program. A Covered Person is an "owner" of a SGC record if he or she is its creator, author, sender, recipient, copier, handler or forwarder. (*"Ownership" as used in the RM Program is meant to denote only responsibility for records. Members do not obtain any*

right, title or interest in and to the SGC's records except as may be provided in the SGC's Intellectual and Other Property, Confidential Information and Nonsolicitation Policy [Policy Number 201L.])

This policy was approved by the GSSIMR Board of Directors on September 5, 2018.

This policy was last updated by the GSSIMR Board of Directors on November 09, 2020.

This policy will be reviewed by the GSSIMR Board of Directors in 2022.

Attachment A
Records Retention Schedule

Area	Retention Period	Examples of Documents (included, but not limited to)	Examples of Exceptions
Finance, Tax, Accounting and Audit	7 years	Invoices; Vouchers; Receipts; Checks; Evidence of Expenses, Assets or Liabilities; Primary records of Purchases, Sales, Payables, Receivables, Amortization, Depreciation, Acquisition and Disposition; Materials Assembled, Created, Received and/or Externally Shared in Connection with Audits and Financial Statements (work papers, spreadsheets, charts, summaries, memoranda, notes regarding methods or assumptions, internal control documents); Expense Reports; Purchase Orders; Cost Center Reports; Capital Records (bills of sale, deeds, easements, licenses, amortization, depreciation, maintenance, repair); and Insurance Records.	The retention period for records assembled and/or externally shared in connection with audits and financial statements retain their original retention periods. Records received and created in connection with IRS audits, including Information Document Requests (IDRs) and responses to IRDs, must be retained in perpetuity.
Legal	7 years	Contracts (Agreements, Deeds, Definitive Contracts, Memoranda of Understanding and all internal and external communications and documents relating to those contracts); Legal Opinions; Legal research; Forms; Templates; Investigation Files; Litigation Files; Affidavits; Depositions; Settlement Agreements; Disputes; and Claims.	Fundamental Organizational Records (Leadership, Ownership, Governance, Reorganizations, and Public Filings) that are retained for historical record keeping; Contracts that are in effect for longer than the 7 year retention period.
PI (Labs) and Core Facilities	In perpetuity	Lab notebooks, any scientific data, samples and research tools stored on the appropriate Network Share Drives,	Equipment manuals (should be kept for the duration of the equipment life.)
Administration/ Human Resources/ Benefits/	7 years	Pre-employment forms; Resumes; Job Descriptions; Employment Agreements; Attendance; Discipline; Promotions; Evaluations; Health and Medical	Human Resources Records pertaining to current members of the SGC should be kept

Area	Retention Period	Examples of Documents (included, but not limited to)	Examples of Exceptions
Workers Compensation		Benefits; Employee Handbooks; Policies and Procedures; Member Security Clearances; and Workplace Accident Reports and Injury Reports related to Workplace Conditions.	throughout the member's tenure at the SGC. These records should be destroyed at the end of the retention period unless an exception is requested and approved.
Research Regulations & EH&S	10 years	Monitoring and Testing Records, Hazardous Emissions; Records of Actions Taken, Remediation; Records relating to Compliance and Certification; Exposure Records; Records relating to Injury or Medical Complaints related to Exposures; Emergency Action Plans; and Safety Records	
Operations & Services	7 years		Facility information (regarding renovations and maintenance), systems documentation should be retained in perpetuity.
Science Communications	7 years	Letters; Memoranda; Faxes; Press and Publications; Personal Convenience records (copies of original documents that have been kept for individual reference and have no other value to the SGC or communications that are strictly personal in nature); Voicemails; and all other Communications regardless of media (electronic, paper, etc.)	NOTE: Communications relating to science records that labs wish to retain after a member's departure should be stored on lab drives.
Information Management	7 years	System Security (Access); Data Backup Tapes and Other Media used for Disaster Recovery; Administrative (Operations, Project Records, etc.) and Media	
All	7 years	Twice a year departed members' email (as well as personal files from their H: drive) will be stored offline for the remainder of the retention period.	Emails of current members will be stored on the servers as long as members don't delete their items.

Retention Periods were determined using the following sources: Sarbanes Oxley; Paperwork Reduction Act (Evidence of US Congressional Intent), Uniform Preservation of Private Business Records Act (UPPBRA); Best Business Practices (including Consideration of Sedona Conference, ISO 15489, ANSI/ARMA International and AIIM). Research also included investigation into Mandatory Retention Periods, Personally Identifiable Information standards, and Statutory Limitation Periods.