

**Exhibit III**  
**Records and Information Management (RIM) Policy**

**Records Retention Schedule**

**DEFINITIONS FOR USE IN RECORDS RETENTION SCHEDULE**

**RECORDED INFORMATION:** information recorded on/in a tangible medium (e.g. paper documents and/or electronic documents) that has been created, produced, received, manipulated, maintained, or preserved for and/or on behalf of the Archdiocese, parishes within its territory, and/or for Ecclesiastical Organizations, or their respective employees, in the course or transaction of business and/or pursuant to legal obligations.

Sub-categories of Recorded Information:

**RECORDS:** information recorded on/in a tangible medium and intentionally retained and managed as evidence of the Archdiocese's activities, events, and/or transactions and because of their ongoing business, operational, legal, and/or historical value. Records are retained according to their respective Records Retention Schedule.

**NON-RECORDS:** information recorded on tangible medium with little to no organizational value and not subject to canon, federal, or state law. Non-Records are not included in Records Retention Schedules and shall be disposed of once they no longer have organizational value—normally not to exceed three years.

**RECORDS RETENTION SCHEDULE:** represents the particular law of the Archdiocese and specifies the Record categories and required retention periods per canon, federal, and state law requirements, and per operational requirements and historical value.

**LEGAL HOLD:** the procedure that ceases otherwise routine disposal of certain Recorded Information related to initiated, threatened, anticipated, or pending Church and/or secular investigations, or litigation, even if Records and Information Management Policies, including Records Retention Schedules, mandate disposal under normal circumstances.

**THE RETENTION PERIODS LISTED IN THIS RECORD RETENTION SCHEDULE  
ARE ABSOLUTE AND ONLY TO BE SUPERSEDED BY A LEGAL HOLD**

<b>RECORDS RETENTION SCHEDULE</b>	
<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
<b>ALL DEPARTMENTS / OFFICES – ADMINISTRATIVE RECORDS</b>	
applicable to every department / office unless otherwise specified by department / office policy	
<b>Contracts / Leases</b> (e.g., service agreements, copier leases)	Expiration + 7 years
<b>Communications, Official</b> (e.g., decrees, policies, directives, procedures, etc.)	Permanent
<b>Communications, Routine</b> (Office of Archbishop)	3 years, then transfer to Archives for review
<b>Communications, Routine</b> (excluding Office of Archbishop)	7 years, unless business needs require longer retention
<b>Council Documents, Archdiocesan / Parish</b> (e.g., minutes, agendas)	Permanent
<b>Deeds / Abstracts</b>	Permanent
<b>Donative Instruments</b> (e.g., bequests, estate papers, wills)	Permanent
<b>Donor Lists</b>	Permanent
<b>Event Records</b> (e.g., jubilee brochures, installation invitations, anniversary histories, worship aids)	Permanent
<b>Governing Documents</b> (e.g., articles of incorporation, bylaws, canonical statutes)	Permanent
<b>Insurance Policies</b> (active & cancelled)	Permanent
<b>Inventories</b> (e.g., property, equipment)	Permanent
<b>Office Files, Subject</b> (e.g., memos, schedules, notes, brochures)	7 years
<b>Periodical Clippings / Photographs</b> (e.g., newspaper articles, historical photos)	Permanent
<b>Seminar / Workshop Records</b> (e.g., attendee lists, worship aids, agendas)	Permanent
<b>Studies / Reports, General</b> (e.g., census / demographic reports, mass counts)	7 years, then transfer to Archives for review
<b>Studies / Reports, Official</b> (e.g., deanery reports, reports to Rome)	Permanent
<b>Rosters</b> (e.g., parishioner rosters)	Permanent

<b>RECORDS RETENTION SCHEDULE</b>	
<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
<b>ARCHIVES</b>	
<b>Approved Records Transfer Forms &amp; Destruction Applications</b>	20 years
<b>Archbishop Decrees</b>	Permanent
<b>Baptism / Confirmation / First Communion / Marriage &amp; Death Registers</b> (closed parishes only)	Permanent
<b>Building Blueprints</b>	Permanent
<b>Clergy Newsletters / Parish Bulletins</b> (record copy)	Permanent
<b>Denver Catholic Register</b> (back-issues & photos)	Permanent
<b>El Pueblo</b> (back-issues & photos)	Permanent
<b>Historical Files</b> (e.g., archdiocesan / parish / parish school / cleric / parishioner histories)	Permanent
<b>Kenedy Directory</b> (Official Catholic Directory)	Permanent
<b>Local Directories</b> (e.g., archdiocesan, parish)	Permanent
<b>Newsletters</b> (archdiocesan, parish, etc.)	Permanent
<b>Parish Decrees &amp; Boundaries / Maps</b>	Permanent
<b>Periodical Clippings / Photographs</b> (e.g., newspaper articles, historical photos)	Permanent
<b>Research Requests</b>	3 years
<b>Sacramental Record Indices</b> (inclusive of legal documentation regarding legal name changes, legal adoptions, etc.)	Permanent
<b>School Historical Materials</b> (e.g., yearbooks, newsletters)	Permanent
<b>School Transcript Requests</b> (closed parish schools)	3 years

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<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
<b>CATHOLIC SCHOOLS</b>	
<i>Consult Office of Catholic Schools</i>	
<b>CEMETERIES, ARCHDIOCESAN &amp; PARISH</b>	
<b>Account Cards</b> (record of lot ownership and payments)	Permanent
<b>Burial Cards</b> (record of interred name, date of burial, etc., alphabetically)	Permanent
<b>Burial Records</b> (record of interred name, date of burial, etc.)	Permanent
<b>Lot Maps</b>	Permanent
<b>Anniversary Books</b>	Permanent
<b>Contracts documenting lot ownership</b>	Permanent
<b>CHILD and YOUTH PROTECTION</b>	
<b>Master Training Lists</b>	Permanent
<b>Teaching Materials</b>	Until superseded
<b>USCCB Charter for the Protection of Children and Young People</b> (see Human Resources)	
<b>COMMUNICATIONS</b>	
<b>Advertiser Lists</b>	Until superseded
<b>Media Lists</b> (e.g., external reporter contact lists, external news outlets)	Until superseded
<b>News Releases / Press Statements</b>	Permanent
<b>Photographs</b>	Permanent
<b>Research / Issue Files</b> (e.g., documentation of media coverage on)	Permanent

<b>RECORDS RETENTION SCHEDULE</b>	
<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
<b>Subscription Database</b>	Until superseded
<b>CONSTRUCTION</b>	
<b>Architectural Records / Drawings, Blueprints, Building Designs, Specifications, Permits</b> (if project completed) (record copy)	Permanent
<b>DIACONATE</b>	
<i>Consult Office of Diaconate</i>	
<b>FINANCE, ACCOUNTING &amp; INTERNAL AUDIT</b>	
<b>Accounting</b>	
Accounts payable invoices	7 years
Accounts payable ledgers	7 years
Accounts receivable ledgers	7 years
Invoices and paid bills, major building construction	7 years
Invoices and paid bills, general accounts, receipts	7 years
Cash journals	7 years
Cash journal, receipts on offering, and pledges	7 years
Mortgage payments	7 years
<b>Banking</b>	
Bank deposits	7 years
Bank statements	7 years
Cancelled checks	7 years
Check registers/stubs	7 years
<b>General</b>	
Audit Reports	Permanent
Balance Sheets, annual	Permanent
Balance Sheets & Income Statements, monthly/quarterly	2 years
Budgets, approved / revised	7 years
External CPA Review Reports and Management Letter	Chancery Audit Dept – 5 years Parishes – Permanent
Financial Reports / Statements, annual	Permanent
Financial Reports, quarterly	2 years
Internal Audit Reports & Supporting Documentation	5 years

<b>RECORDS RETENTION SCHEDULE</b>	
<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
Internal Audit Investigation Reports	Upon closure + 7 years
<b>Investment / Insurance</b>	
Bonds, cancelled	Cancellation + 7 years
Certificates of Deposit, cancelled	Redemption + 3 years
Insurance Policies (active / cancelled)	Permanent
Letters of Credit	7 years
Mortgage records	Permanent
Securities sales	7 years
Stock investments	Sale + 7 years
<b>Other Records</b>	
General ledger/annual	Permanent
Journals, general and specific funds / entry sheets	7 years
Ledgers, subsidiary	7 years
Payroll journals	7 years
Payroll registers, summary schedule of earnings, deductions, and accrued leave	7 years
Pension records	Permanent
Pledge registers/ledgers	7 years
<b>Tax Records</b>	
Employment taxes, contributions, and payments (including taxes withheld) FICA	Filing + 7 years
W-2 Forms	Filing + 7 years
W-4 Forms	Filing + 7 years
IRS exemption determination letters	Permanent
Form 990	Permanent
State tax exemption certificates (income, excise, property, sales/use, etc.)	Permanent
<b>HUMAN RESOURCES</b>	
<b>Employee Benefits</b>	
Disability Records	Permanent
Pension Vesting Records	Permanent
Retirement Benefit Records	Permanent
Service Records	Permanent
<b>General</b>	
Permanent Earnings & Records	Benefit termination + 7 years
Attendance Records (unrelated to time sheets)	Termination + 7 years
Employee Salary Schedules & Pay Rate Changes	Termination + 7 years
<b>Health &amp; Safety</b>	
Employee Medical Complaints	7 years
Employee Medical Records under Family Medical Leave Act	3 years
Employee Physical / Medical Records under Americans with Disabilities Act (ADA)	1 year
& Age Discrimination in Employment Act of 1967 (ADEA)	

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<b>DEPT. / OFFICE</b>	<b>RETENTION PERIOD</b>
<b>Record Category / Type</b>	
Toxic Substance Control Reports	30 years
Workers' Compensation Records	Filing, death or final compensation period + 12 years
Drug Testing Records	Test Result + 5 years
Material Safety Data Sheet (MSDS)	30 years
<b>Personnel Actions</b>	
Employee Evaluations	Termination + 7 years
Personnel Files, terminated / deceased	7 years
I-9 Form (hired on/after 11/6/1986)	Termination + 1 year, or Date of hire + 3 years (whichever is greater)
Colorado Affirmation of Legal Work Status (hired on or after 1/1/2007)	Duration of Employment
<b>Salary Administration</b>	
W-2 Forms	Filing + 7 years
W-4 Forms	Filing + 7 years
Time Sheets / Cards	Filing + 3 years
<b>USCCB Charter for the Protection of Children and Young People</b>	
Background Checks	Termination + 7 years
Safe Environment Proof of Training Records	Termination + 7 years
Executed Acknowledgement of Code of Conduct Receipt Forms	Termination + 7 years
<b>REAL ESTATE</b>	
<b>Architectural Records / Drawings, Blueprints, Building Designs, Specifications, Permits</b> (if project completed) (record copy)	Permanent
<b>Deeds / Abstracts</b>	Permanent
<b>Government Related Documents</b> (e.g., tax exemption certificates, etc.)	Until Sold
<b>Inspections</b>	Until Superseded
<b>Leases</b>	Permanent
<b>Mortgage Documents</b>	Permanent
<b>Owner Records</b>	Until Sold
<b>Property Appraisals</b>	Permanent
<b>Surveys / Plots, Plans</b>	Permanent
<b>Title Search Documents / Certificates</b>	Permanent

<b>RECORDS RETENTION SCHEDULE</b>		
<b>DEPT. / OFFICE</b>	<b>Record Category / Type</b>	<b>RETENTION PERIOD</b>
	<b>Utility Records</b>	Until Sold
<b>RISK MANAGEMENT</b>		
	<b>Bloodborne Pathogens / Infectious Material Standard</b>	3 years
	<b>Drug Testing Records</b>	Test Result + 5 years
	<b>Environmental Test Records / Reports</b>	Permanent
	<b>Employee Physical / Medical Records</b> (includes bloodborne pathogens, infectious materials)	Termination + 30 years
	<b>Hazardous Materials Exposure Records</b>	30 years
	<b>Incident Reports / Claims</b> (accident / injury)	Expiration of Statute of Limitations, or Claim Settlement + 7 years, as applicable
	<b>Insurance Certificates</b> (issued internally)	Expiration + 7 years
	<b>Insurance Policies</b> (active & cancelled)	Permanent
	<b>Material Safety Data Sheet</b> (MSDS)	30 years
	<b>Toxic Substance Control Reports</b>	30 years
	<b>Training Records</b> (motor vehicle, OSHA)	7 years
	<b>Workers' Compensation Records</b>	Filing, death or final compensation period + 12 years
<b>TRIBUNAL</b>		
	<b>Consult Office of the Tribunal</b>	
<b>VICAR FOR CLERGY</b>		
	<i>Consult Office of Vicar for Clergy</i>	