

# **PROCUREMENT SERVICES POLICY ON DOCUMENT IMAGES AS DOCUMENT OF RECORD**

**Effective Date: July 2015**

**Revision: July 2016**

## **Policy Statement**

Pursuant to Columbia University's Records Retention policy, this policy establishes electronic images of documents provided as supporting documentation for Accounts Payable, Purchasing and Vendor Management transactions as documents of record for Procurement Services and the University.

## **Reasons for the Policy**

This policy is intended to provide guidance regarding which University records can be officially retained in a digital/electronic format. This policy also provides guidance for disposal of their paper counterparts in accordance with the schedule provided in Appendix A to this policy.

## **Primary Guidance to Which This Policy Responds**

This policy responds to IRS Revenue Procedure 97-22 and IRS Revenue Procedure 98-25. This policy is also guided by and in accordance with Columbia University's Records Retention policy.

## **Roles and Responsibilities**

### **Office of Record**

The Office of Record is responsible for identifying the records to be retained and determining, in collaboration with OGC, the period of retention. The Office of Record must also make arrangements for the proper storage of the records and coordinate with outside vendors for that purpose, where appropriate. Finally, the Office of Record arranges for the handling of the disposal of records whose retention period has expired.

### **Office of the General Counsel**

The Office of the General Counsel (OGC) is responsible for providing guidance regarding the legal retention requirements for documents and coordinating document holds when litigation is ongoing, pending, threatened, or likely. The University's General Counsel will designate one or more individuals to serve as the point of contact.

## **Responsible University Office**

Procurement Services

## **Revision History**

This policy revised an earlier version, dated July 2015

### **What Is Governed By This Policy**

The specific records covered by this policy are listed in the RRS. Any record not listed on the RRS is *not* covered by this policy and should be retained in a manner consistent with existing practice and procedure. Please note that the University has separate policies and procedures for records containing personal health information available at:

<http://www.cumc.columbia.edu/hipaa/>

### **Who Should Know This Policy**

All University employees, including student workers and temporary workers

All contractors who create, use, or store University records

All consultants who create, use, or store University records

All vendors who create, use, or store University records

### **Exclusions & Special Situations -- Document Holds**

Any records relevant to pending or ongoing litigation, government investigation, or audit **MUST BE RETAINED** until such matters have been resolved, all appeals are exhausted, and the retention period has expired. All disposal of relevant records must cease, including the disposal of records according to approved retention periods, when such a document hold is in place. In cases where litigation is threatened or likely, consult the Office of the General Counsel to determine whether a litigation hold is required.

### **Policy Text**

IRS Revenue Procedure 97-22 provides guidance to taxpayers that use an electronic storage system, including images of hardcopy (paper), and the requirements for having records in an electronic storage system considered to be records within the definition of the Internal Revenue Code. Under IRS Revenue Procedure 97-22, the University's electronic document management (EDM) system meets the general requirements for having records stored in the system considered to be records for IRS purposes. Records stored in the EDM system in accordance with established procedures for Procurement Services (Accounts Payable, Vendor Management, and Purchasing) can, therefore, be considered documents of record. Procurement Services will continue to be considered the Office of Record for the retention of documents of record, whether stored electronically or in hardcopy (paper) form, as listed in the Records Retention Schedule for Procurement Services (RRS-PS) in Appendix A of the Procurement Services Policy on Records Retention.

### **Additional Exceptions Requiring Retention of Hardcopy (Paper) Documents**

- Regardless of whether a hardcopy (paper) document is stored electronically in the EDM system, Departments should continue to send contracts to Purchasing that require an original "wet" authorized signature.
- Departments should continue to fax to Vendor Management W9s and W8s.

- P-Card original receipts must continue to be retained by the department per record retention schedules.
- As noted above, any original documents, any document copies, and any annotated document copies, subject to a document hold as a result of a pending or ongoing litigation, government investigation, or audit must be retained.

### **Retention and Disposal of Hardcopy (Paper) Documents also Stored Electronically**

For documents not covered by Document Holds and Additional Exceptions noted above, original hardcopy (paper) documents that are also stored in the EDM system must be retained for a full year after the fiscal year in which the transaction to which they relate occurred. At the end of the fiscal year after the year in which the transaction occurred (e.g. end of fiscal year 2011 for a transaction that occurred in fiscal year 2010) those paper documents can be disposed of. See Appendix A for additional detail regarding eligibility for disposal of hardcopy (paper) documents also stored electronically.

### **All disposal of records, whether paper or electronic, must be accomplished pursuant to the University Sanitization and Disposal of Information Resources Policy.**

**(<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>).**

That Policy provides for particular methods of disposal (e.g., cross-shedding and/or approved electronic disposal) either on-site or through an approved outside vendor for records that may contain any sensitive or identifying personal information, to ensure that unauthorized individuals cannot access the information.

Sensitive or identifying personal information includes, but is not limited to, social security number, driver's license number, mother's maiden name, account numbers or codes, personal financial information, and/or protected health information.

### **Contacts**

Any questions or inquiries with respect to the administration of this policy should be directed as follows.

### **Questions regarding the application of the policy:**

Please submit inquiries via an Incident in Service Now:

Web form: <http://finance.columbia.edu/content/finance-service-center>

Phone: (212) 854-2122

**Cross References to Related Policies**

[http://policylibrary.columbia.edu/node\\_browser/nodes\\_by\\_category/term/76](http://policylibrary.columbia.edu/node_browser/nodes_by_category/term/76)

**Procurement Services Records Retention Policy**

<http://policylibrary.columbia.edu/procurement-records-retention-policy>

**University Records Retention Policy**

<http://policylibrary.columbia.edu/records-retention-policy>

**Sanitization and Disposal of Information Resources Policy**

<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>

**Post-Issuance Compliance Policy (Tax-Exempt Bond Financings)**

<http://policylibrary.columbia.edu/postissuance-compliance-policy-tax-exempt-bond-financings>

## Appendix A

### Disposal Schedule for Paper Counterparts to Document Images Applies Only to Paper Counterparts Covered by Policy

| <b>Period During Which Transaction Occurred</b> | <b>Date After Which Paper Counterparts to Document Images Can Be Disposed, Once Confirmed via Communication From Procurement Services</b> |
|---|---|
| <b>July 1, 2012 –<br/>June 30, 2013</b>         | <b>August 1, 2014</b>   |
| <b>July 1, 2013 –<br/>June 30, 2014</b>         | <b>August 1, 2015</b>   |
| <b>July 1, 2014 –<br/>June 30, 2015</b>         | <b>August 1, 2016</b>   |
| <b>July 1, 2015 –<br/>June 30, 2016</b>         | <b>August 1, 2017</b>   |
| <b>July 1, 2016 –<br/>June 30, 2017</b>         | <b>August 1, 2018</b>   |
| <b>July 1, 2017 –<br/>June 30, 2018</b>         | <b>August 1, 2019</b>   |
| <b>July 1, 2018 –<br/>June 30, 2019</b>         | <b>August 1, 2020</b>   |