



## RECORD RETENTION POLICY

The Patient-Centered Outcomes Research Institute (“PCORI”) creates a wide variety of records for both internal and external uses. This policy identifies key records and describes the retention periods for hard copy and electronic forms of these records. The purpose of this policy is to ensure that official records, documents and communications of PCORI are safeguarded and maintained per Federal requirements. This policy also will help ensure that PCORI maintains essential records for tax, audit and historical purposes, while providing for the systematic destruction of documents based on government recordkeeping requirements and business needs. The retention periods described herein are based on current legal requirements, practice and advice of counsel. While some records are required to be kept permanently, some documents have no further value for future use and retention of such documents is not only wasteful, but makes it difficult to manage the overall volume of documentation in a manner that allows useful documents to be readily identified and retrieved as needed.

Generally, documents should be retained only so long as they are (1) necessary to the current conduct of PCORI business; (2) required to be kept by statute or government regulation; or (3) relevant to pending or foreseeable investigations or litigation. Generally, drafts of documents should be destroyed after the document is in final form.

Courts make no distinction between electronic (e.g., email) and paper documents when ordering the production of discovery. Therefore, this Policy applies to all documents and records, in whatever form, unless otherwise specified.

~~As a reminder, all records should be written with the expectation that they may be read by persons other than the intended recipient. Thus, all documents should be drafted in a courteous and professional manner.~~

This Policy also provides that confidential or privileged documents remain protected from disclosure. Confidential records should be distributed on an “as needed” basis. Documents with sensitive information should be secured and access or distribution limited. Communications containing legal advice should be marked “Confidential and Privileged” and clearly identify the authors or recipients as lawyers. Employees, officers or Governors should not redistribute documents containing privileged attorney-client information without specific authorization from the attorney.

Documents should not be retained past the designated times set forth in this Policy. In addition, all paper and electronic files should undergo periodic review, at least annually, to ensure compliance with the Policy. In the event that PCORI is provided with actual or



constructive notice of pending litigation or investigation, PCORI’s regular document destruction practices should be suspended with respect to potentially relevant or responsive documents.

All documents and records of PCORI, including those in the possession of Governors and committee members, shall be retained in accordance with the provisions of this Document Retention Policy. Documents and records shall be retained for the time period as indicated below. All documents and records shall be maintained in a manner so as to be accessible within 72 hours at the offices of PCORI by request of the Board or its designee.

<u>Document Type</u>	<u>Retention Period</u>
<b><u>Board of Governors Documents</u></b>	
Board meeting and hearing agenda and exhibits	Permanent
Regular and executive session minutes	Permanent
<del>Board meeting notes</del>	<del>Discard when minutes are approved</del>
Conflict of Interest Disclosures	Permanent
<del>Correspondence</del>	<del>1 year if there is no longer any need to retain the document</del>

<b><u>Committee/Advisory Panel Documents</u></b>	
Committee meeting agendas and exhibits	Permanent
Committee minutes	Permanent
<del>Committee meeting notes</del>	<del>Discard when minutes are approved</del>
Committee Policies	Permanent
Committee membership lists	Permanent
<del>Committee records and supporting documents</del>	<del>Discard after need no longer exists</del>
Conflict of Interest Disclosures	Permanent
<del>Correspondence</del>	<del>1 year if there is no longer any need to retain the document</del>
<del>Official Reports</del>	<del>Permanent</del>

**Comparative Clinical Effectiveness Research Materials (as referenced in Patient Protection and Affordable Care Act)**

National Priorities	Permanent
Research Project Agenda	Permanent
Methodological Standards	Permanent
Translation Table	Permanent
Research Methods	Permanent
Researcher Identities, Conflict Information	Permanent
Research Findings	Permanent

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Information Contained in Findings	Permanent
Peer Review Findings	Permanent
List of Participants in Peer-Review Process	Permanent
Annual Reports to Congress and President	Permanent
Public Notices	Permanent
Public Comments	Permanent

**Organization Documents**

Articles of Incorporation and Amendments	Permanent
Bylaws	Permanent
Governance policies (conflict of interest, confidentiality, document retention, etc.)	Permanent
Mission statements	Permanent
Strategic Plan	Permanent
Other Official Policies and Procedures documents	Permanent
Conflict of Interest Disclosures	Permanent

**Accounting and Finance Documents**

Audit reports (Annual Financial Review)	Permanent
Bank reconciliations	7 years
Bank statements	7 years
Budgets	<del>Permanent</del> 7 years
Cancelled checks	
Routine payments	7 years
Important payments (taxes, property, etc.)	Permanent
Check register (ledger)	7 years
Deposit slips	73 years
Depreciation Records	Permanent
Financial Statements	Permanent
Insurance policies and records (including claims and reports)	
Expired	10 years
Active	Permanent



Tax returns and worksheets (federal, state and local)	Permanent
Tax Exemption Filings and Determinations	Permanent
Invoices (incoming and outgoing)	7 years
Vouchers (board members and others for travel, entertainment)	7 years

**Legal**

Business permits	Permanent
Claims and litigation files	Permanent

<del>Funded</del> Contracts, e.g., research contracts	<del>Permanent</del> 3 years after closeout of the contract
confidentiality agreements, services agreements, license agreements, independent contractor agreements, etc.	

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<del>Contracts drafts</del>	<del>Discard after final contract is signed (Also discard any associated written or email discussions and drafts)</del>
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<del>Unfunded funding applications</del>	<del>at least 1 year after funding decision</del>
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Trademark registrations and copyrights	Permanent
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Legal Memoranda and Correspondence	Permanent
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<del>Merit Review Critiques, Scores and Summary Statements</del>	<del>at least 1 year after funding decision</del>
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**Publications**

Official publications, including advertisements, position papers, white papers	Permanent
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Newsletters	Permanent
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Press releases	<del>Permanent or 3 years if no longer necessary</del>
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Presentations	<del>Permanent or 3 years if no longer necessary</del>
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**Other**

<del>All other correspondence, records and year documents to the extent not specifically retain listed above</del>	<del>Unless otherwise required by law, 1 if there is no longer any need to the document.</del>
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<del>Drafts of Documents, Findings and Records</del>	<del>Unless otherwise required by law,</del>
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PATIENT-CENTERED OUTCOMES RESEARCH INSTITUTE

~~Otherwise Retained in Final Form~~ — ~~discard when final document,  
finding or record adopted~~

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