

COVID-19 Related Records: Crosswalk with the UC Records Retention Schedule

December 11, 2020

The [University of California Records Management Committee](#) (RMC) developed this guidance for use by UC personnel to help them follow legal requirements and data privacy standards with respect to retention of COVID-19 related records. The guidance takes the form of a crosswalk between various COVID-19 related records being created and existing administrative records categories and retention periods in the [University of California Records Retention Schedule](#). The schedule covers only administrative records, not individual patient records.

The committee developed the crosswalk after careful examination of the retention schedule, conversations with UC Legal, and discussions with campus personnel about the COVID-19 related records they are creating or collecting. The committee will update the crosswalk as necessary. Any questions about the COVID-19 records crosswalk should be directed to the campus [Records Management Coordinator](#).

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
1	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Sent solely to the employee, letting them know they are approved to go to work	0001	General Routine Office Transitory Records	Official Record: Retain records for no longer than one year after their administrative use ceases.	What you should know about COVID-19 and the Americans with Disabilities Act	8.A. . . . An employer may exclude those with COVID-19, or symptoms associated with COVID-19, from the workplace because, as EEOC has stated, their presence would pose a direct threat to the health or safety of others. However, for those employees who are teleworking and are not physically interacting with coworkers or others (for example, customers), the employer would generally not be permitted to ask these questions.
2	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Sent solely to the employee, letting them know they are not approved to go to work	0001	General Routine Office Transitory Records			
3	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Sent to employee and supervisor, letting them know they are approved to go to work	0001	General Routine Office Transitory Records	Official Record: Retain records for no longer than one year after their administrative use ceases.		
4	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Sent to employee and supervisor, letting them know they are not approved to go to work	0001	General Routine Office Transitory Records			
5	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Used to document leave taken by staff that impacts service credits	0003B1	Payroll and Benefits Records - Timekeeping and Leave Records - Leave Records that document impacts to service credits	Official Record: Retain records 50 years after the end of the fiscal year in which the records are created.	See citations in the UC Records Retention Schedule, in the comments section	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
6	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Used to document leave taken by staff that does not impact service credits	0003B2	Payroll and Benefits Records - Timekeeping and Leave Records - All Other Timekeeping and Leave Records	Official Record: Retain records for 3 years after the end of the fiscal year of the end of the specifically recorded time or leave. If the records are used as supporting documentation for sponsored activities - Retain records 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer.	See citations in the UC Records Retention Schedule, in the comments section	
7	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Used to document leave taken by Academic Personnel that impacts service credits	0016D	Academic Personnel Records - Academic Personnel Leaves of Absence Records	Official Record: Retain records for 5 years after the end of the fiscal year in which the Academic Appointee is no longer affiliated with the University.	See citations in the UC Records Retention Schedule, in the comments section	
8	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Used to document leave taken by Academic Personnel that does not impact service credits	0016D	Academic Personnel Records - Academic Personnel Leaves of Absence Records	Official Record: Retain records for 5 years after the end of the fiscal year in which the Academic Appointee is no longer affiliated with the University.	See citations in the UC Records Retention Schedule, in the comments section	
9	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	Used to document use of funding sources for leave taken	0003B2	Payroll and Benefits Records - Timekeeping and Leave Records - All Other Timekeeping and Leave Records	Official Record: Retain records for 3 years after the end of the fiscal year of the end of the specifically recorded time or leave. If the records are used as supporting documentation for sponsored activities - Retain records 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer.	See citations in the UC Records Retention Schedule, in the comments section	
10	Self-Screening Records	Attestations regarding health status and symptoms in relation to COVID	If made/maintained by a physician, nurse, or other health care personnel, or technician	0004C1	Human Resources Records - Employment Related Claims Records - Employee Exposure Medical Records	Official Record: Retain records 30 years after the end of the fiscal year in which the employee separates from the University.	8 CCR 3204(d)(1)(A) See citations in the UC Records Retention Schedule, in the comments section	
11	Testing Records	Test must be ordered by a licensed medical professional or pharmacist. Tests may	At medical centers, Occupational Health, Student Health Centers	N/A	By Policy, records pertaining to individual patient care (medical records) are	By Policy, records pertaining to individual patient care (medical records) are not covered in the UC Records Management		

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		only be conducted by a licensed medical professional or pharmacist. Will become part of the patient's medical record			not covered in the UC Records Management Program, and therefore are not found in the UC Records Retention Schedule.	Program, and therefore are not found in the UC Records Retention Schedule.		
12	Testing Records	For students, to determine eligibility to attend in-person classes.	Results given to someone at the location other than the medical arena. This is considered an education records in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG: records of leaves of absence, or withdrawal	0011A3	Student Records - Individual Student Admissions and Academic Records - Matriculated Students' Admission Application Records, Academic Advising Records, and Non-Permanent Student Academic Records such as, but not limited to Applications for Degrees, Withdrawal or Cancellation Records, and Changes to Course of Study, Degrees, and Classes Records in systems that allow for systematic purging	Official Record: Retain records for 5 years after the end of the academic year in which the records are processed or for no longer than one year after their administrative use ceases, whichever is longer.	See citations in the UC Records Retention Schedule, in the comments section	
13	Testing Records	For students, to determine eligibility to attend in-person classes.	Results given to someone at the location other than the medical arena. This is considered an education records in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG: records of leaves of absence, or withdrawal	0011A4	Student Records - Individual Student Admissions and Academic Records - Matriculated Students' Admission Application Records, Academic Advising Records, and Non-Permanent Student Academic Records such as, but not limited to Applications for Degrees, Withdrawal or Cancellation Records, and Changes to Course of Study, Degrees, and Classes Records in systems that do not allow for systematic purging	Official Record: Retain records for 5 years after the end of the academic year in which the student no longer attends the University.	See citations in the UC Records Retention Schedule, in the comments section	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
14	Testing Records	For students, to determine eligibility to attend in-person classes.	Results given to someone at the location other than the medical arena, whether or not the results provided details to identify the individual. This is considered an education records in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG: housing records - special accommodations	0011F2	Student Records - Student Residential Life Records - All Other Students Residential Life Records	Official Record: Retain records for 4 years after the end of the academic year in which all activity has ended.	See citations in the UC Records Retention Schedule, in the comments section	
15	Testing Records	For students, to determine eligibility to attend in-person classes.	Results given to someone at the location other than the medical arena. This is considered an education records in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG: reasonable accommodations	0011H	Student Records - Reasonable Accommodations Student Records	Official Record: Retain records for 5 years after the end of the academic year in which the student no longer attends the University.	See citations in the UC Records Retention Schedule, in the comments section	
16	Testing Records	For students, to determine eligibility to attend in-person classes.	Results given to someone at the location other than the medical arena, whether or not the results provided details to identify the individual. This is considered an education records in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG: Facilities maintenance records - custodial arrangements	0008D	Capital Resources Records - Facilities Management Records	Official Record: Retain records for 6 years after the end of the fiscal year in which the property is no longer owned by the University or for 6 years after the end of the fiscal year in which administrative use ceases - whichever is sooner.	See citations in the UC Records Retention Schedule, in the comments section	
17	COVID Contact Tracing Records	See Case Investigation Records, Ref # 24						
18	COVID-19 Related Leaves records		Used to document leave taken by staff that impacts service credits	0003B1	Payroll and Benefits Records - Timekeeping and Leave Records - Leave Records that	Official Record: Retain records 50 years after the end of the fiscal year in which the records are created.	See citations in the UC Records Retention Schedule, in the	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
19	COVID-19 Related Leaves records		Used to document leave taken by staff that does not impact service credits	0003B2	document impacts to service credits Payroll and Benefits Records - Timekeeping and Leave Records - All Other Timekeeping and Leave Records	Official Record: Retain records for 3 years after the end of the fiscal year of the end of the specifically recorded time or leave. If the records are used as supporting documentation for sponsored activities - Retain records 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer.	comments section See citations in the UC Records Retention Schedule, in the comments section	
20	COVID-19 Related Leaves records		Used to document leave taken by Academic Personnel that impacts service credits	0016D	Academic Personnel Records - Academic Personnel Leaves of Absence Records	Official Record: Retain records for 5 years after the end of the fiscal year in which the Academic Appointee is no longer affiliated with the University.	See citations in the UC Records Retention Schedule, in the comments section	
21	Employee Exposure Medical Records			0004C1	Human Resources Records - Employment Related Claims Records - Employee Exposure Medical Records	Official Record: Retain records 30 years after the end of the fiscal year in which the employee separates from the University.	8 CCR 3204(d)(1)(A) See citations in the UC Records Retention Schedule, in the comments section	
22	Policy and Procedure Documentation		Not documenting specific individual information	0002A	Program Administration Records - Program administration records of enduring historical value	Official Record: Permanent, subject to University Archives review. Coordinate the transfer of these records to the University Archives when no longer needed for current operational business.	See citations in the UC Records Retention Schedule, in the comments section	
23	Notification records	Notifying employees of possible exposure to COVID-19 in the workplace	Communications found in letters, acknowledgements, memos, notes, transmittals, e-mail messages and other messages that protect the University's rights, document the University's obligations and activities, demonstrate compliance, and address significant issues governed by extant policies and procedures;	0002B	Program Administration Records - Operational program administration records	Official Record: Retain records 5 years after the end of the fiscal year in which the records are created.	AB-685, California Code Labor Code, § 6409.6.(k) - 3 years See citations in the UC Records Retention Schedule, in the comments section	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
24	Case Investigation Records	COVID Contact Tracing Records	But not infected at work. For infected at work, see Employee Exposure Medical Records	0013B5	Risk Management Records - Loss Control Records - All Other Loss Control Records	Official Record: Retain records for 5 years after the end of the fiscal year in which all activities have ended.	See citations in the UC Records Retention Schedule, in the comments section	
25	Reporting records	e.g.: EH&S - distributed to Senior Leadership and others	Not documenting specific individual information	0002A	Program Administration Records - Program administration records of enduring historical value	Official Record: Permanent, subject to University Archives review. Coordinate the transfer of these records to the University Archives when no longer needed for current operational business.	See citations in the UC Records Retention Schedule, in the comments section	
26	Opt in, Opt out records	e.g.: flu shots, wearing masks, test	Academic Personnel	0016C5	Academic Personnel Records - Academic Appointees' Employee Records - All Other Academic Personnel Employee Records	Official Record: Retain records for 5 years after the end of the fiscal year in which the Academic Appointee is no longer affiliated with the University.	See citations in the UC Records Retention Schedule, in the comments section	
27	Opt in, Opt out records	e.g.: flu shots, wearing masks, test	Intern, Volunteer and Contingent Employees	0004B3	Human Resources Records - Individual Employee Employment and Interns, Volunteers and Contingent Workers Records - Intern, Volunteer and Contingent Employees - including student employees including Federal Work Study funded positions - Employment Records	Official Record: Retain records for 3 years after the end of the fiscal year in which the specific individual no longer has any employment relationship with the University.	See citations in the UC Records Retention Schedule, in the comments section	
28	Opt in, Opt out records	e.g.: flu shots, wearing masks, test	Staff	0004B4	Human Resources Records - Individual Employee Employment and Interns, Volunteers and Contingent Workers Records - All Other Employees Employment Records	Official Record: Retain records for 5 years after the end of the fiscal year in which the employee separates from the University.	See citations in the UC Records Retention Schedule, in the comments section	
29	Opt in, Opt out records	e.g.: flu shots, wearing masks, test	Students	0011A3	Student Records - Individual Student Admissions and Academic Records - Matriculated Students' Admission Application Records, Academic Advising Records, and Non-Permanent Student	Official Record: Retain records for 5 years after the end of the academic year in which the records are processed or for no longer than one year after their administrative use ceases, whichever is longer.	See citations in the UC Records Retention Schedule, in the comments section	

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					Academic Records such as, but not limited to Applications for Degrees, Withdrawal or Cancellation Records, and Changes to Course of Study, Degrees, and Classes Records in systems that allow for systematic purging			
30	Opt in, Opt out records	e.g.: flu shots, wearing masks, test	Students	0011A4	Student Records - Individual Student Admissions and Academic Records - Matriculated Students' Admission Application Records, Academic Advising Records, and Non-Permanent Student Academic Records such as, but not limited to Applications for Degrees, Withdrawal or Cancellation Records, and Changes to Course of Study, Degrees, and Classes Records in systems that do not allow for systematic purging	Official Record: Retain records for 5 years after the end of the academic year in which the student no longer attends the University.	See citations in the UC Records Retention Schedule, in the comments section	
31	Environmental testing			0008D	Capital Resources Records - Facilities Management Records	Official Record: Retain records for 6 years after the end of the fiscal year in which the property is no longer owned by the University or for 6 years after the end of the fiscal year in which administrative use ceases - whichever is sooner.	See citations in the UC Records Retention Schedule, in the comments section	
32	Disinfection and safety plan records		Standard, common reports, lists and studies	0002B	Program Administration Records - Operational program administration records	Official Record: Retain records 5 years after the end of the fiscal year in which the records are created.	See citations in the UC Records Retention Schedule, in the comments section	
33	Exception to interim measures	e.g., 1. Importantly, all PIs are required to respond to this email by filling out the		0013B5	Risk Management Records - Loss Control Records - All Other Loss Control Records	Official Record: Retain records for 5 years after the end of the fiscal year in which all activities have ended.	See citations in the UC Records Retention Schedule, in the	

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		survey at the following link. You will be asked to provide the names and contact information of your designated key personnel, as well as requests for exceptions to allow COVID-19 studies or the continuation of ongoing critical experiments. These requests will be screened by the committee listed at the end of this email, and we expect to grant few exceptions.					comments section	
34	Exception to interim measures	e.g., 2. Exceptions may be granted under circumstances when personnel are in public contact throughout most of their shift (e.g., a clinical reception area). To request an exception, a consultation must be requested through a Facilities Services work order (campus and Health).		0013B5	Risk Management Records - Loss Control Records - All Other Loss Control Records	Official Record: Retain records for 5 years after the end of the fiscal year in which all activities have ended.	See citations in the UC Records Retention Schedule, in the comments section	
35	Exception to interim measures	e.g., 3. Campus administrative department heads (control points) may approve requests for teams of fewer than 10 people, or an increase to a group that is already operating onsite. But approval from the Emergency Operations Center (EOC) is necessary before returning teams of 10 or more people. Even after obtaining permission from the		0013B5	Risk Management Records - Loss Control Records - All Other Loss Control Records	Official Record: Retain records for 5 years after the end of the fiscal year in which all activities have ended.	See citations in the UC Records Retention Schedule, in the comments section	

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		EOC, administrative department heads must ensure that onsite personnel are familiar with the protocols on this webpage and that their faculty, staff and learners have enough space to maintain adequate distance while performing their duties. When making a request to the EOC, please identify the number of people you would like to authorize to return to work and their locations and provide a rationale for why they must work onsite.						