

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

December 11, 2020

Revised October 25, 2021

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	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	
2	COVID Contact Tracing Records	See Case Investigation Records, Ref # 24						
3	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 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	
4	COVID-19 Related Leaves records		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	
5	COVID-19 Related Leaves records		Used to document leave taken by Academic	0016D	Academic Personnel Records - Academic	Official Record: Retain records for 5 years after the end of the fiscal year in which the	See citations in the UC Records Retention	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
			Personnel that impacts service credits		Personnel Leaves of Absence Records	Academic Appointee is no longer affiliated with the University.	Schedule, in the comments section	
6	Denied Vaccine requests for exception or deferral and supporting documentation		Disciplinary activities for non-compliance for students	0011E1	Student Records - Student Conduct and Grievances Records - does not include Clery Records-Student Conduct Case Records when the sanction is dismissal or revocation of degree - does not include Clery Records	Official Record: Retain records for 50 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	FAQ 18 of the <a href="#">Policy: SARS-CoV-2 (COVID-19) Vaccination Program</a> states: "Students who fail to Participate by being Vaccinated or requesting an Exception or Deferral on or before the Implementation Date will be barred from Physical Presence at University Facilities and Programs, and may experience consequences as a result of non-Participation, up to and including dismissal from educational programs."
7	Denied Vaccine requests for exception or deferral and supporting documentation		Disciplinary activities for non-compliance for students	0011E2	Student Records - Student Conduct and Grievances Records - does not include Clery Records-All Other Student Conduct and Grievances Records - does not include Clery Records	Official Record: Retain records for 5 years after the end of the academic year in which the case is closed.	See citations in the UC Records Retention Schedule, in the comments section	FAQ 18 of the <a href="#">Policy: SARS-CoV-2 (COVID-19) Vaccination Program</a> states: "Students who fail to Participate by being Vaccinated or requesting an Exception or Deferral on or before the Implementation Date will be barred from Physical Presence at University Facilities and Programs, and may experience consequences as a result of non-Participation, up to and including dismissal from educational programs."
8	Denied Vaccine requests for exception or deferral and supporting documentation		Disciplinary activities for non-compliance for staff	0004C2	Human Resources Records - Employment Related Claims Records - All Other Employment Related Claims Records	Official Record: Retain records 5 years after the end of the fiscal year in which the claim is resolved or as long as required in the specific labor relations contract.	See citations in the UC Records Retention Schedule, in the comments section	
9	Denied Vaccine requests for exception or deferral and supporting documentation		Disciplinary activities for non-compliance for Academic Personnel	0016C2	Academic Personnel Records - Academic Appointees' Employee Records - Faculty Grievances and Disciplinary Claims	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, for the time specified in the disciplinary document, or as long as required in the specific labor relations contract.	See citations in the UC Records Retention Schedule, in the comments section	
10	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	

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11	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	
12	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	
13	Exception to interim measures	e.g., 1. Importantly, all PIs are required to respond to this email by filling out the survey at the following link. You will be asked to provide the names and contact information of your designated key personnel, as well as <b>requests for exceptions to allow COVID-19 studies or the continuation of ongoing critical experiments.</b> These requests will be screened by the committee listed at the end of this email, and we expect to grant few exceptions.		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	
14	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		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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15	Exception to interim measures	<p>order (campus and Health).</p> <p>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 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.</p>		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	
16	Medical consent forms	Authorization forms allowing vaccine information to be transferred to UC		0013A3	Risk Management Records-Loss Prevention Records-All Other Loss Prevention Records	Official Record: Retain records until superseded, obsolete, or administrative use ceases.	See citations in the UC Records Retention Schedule, in the comments section	
17	Non-Pharmaceutical			0013A3	Risk Management Records-Loss Prevention Records-	Official Record: Retain records until superseded, obsolete, or administrative use ceases.	See citations in the UC Records Retention	

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	Intervention Records				All Other Loss Prevention Records		Schedule, in the comments section	
18	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	
19	Opt in, Opt out records	e.g.: flu shots, wearing masks, test, Vaccine information (dates and type received, acknowledgement forms), Vaccine Exception or Deferral records (request forms, approvals, denials)	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	
20	Opt in, Opt out records	e.g.: flu shots, wearing masks, test, Vaccine information (dates and type received, acknowledgement forms), Vaccine Exception or Deferral records (request forms, approvals, denials)	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	
21	Opt in, Opt out records	e.g.: flu shots, wearing masks, test, Vaccine information (dates and type received, acknowledgement forms), Vaccine Exception or Deferral records (request forms, approvals, denials)	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	

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22	Opt in, Opt out records	e.g.: flu shots, wearing masks, test, Vaccine information (dates and type received, acknowledgement forms),Vaccine Exception or Deferral records (request forms, approvals, denials)	Students	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	
23	Opt in, Opt out records	e.g.: flu shots, wearing masks, test, Vaccine information (dates and type received, acknowledgement forms),Vaccine Exception or Deferral records (request forms, approvals, denials)	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	
24	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	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
25	Proof of vaccination, approved non-pharmaceutical interventions, proof those that are not vaccinated, or proof someone does not have approved non-pharmaceutical interventions	Indicators that those vaccinated or those with approved exceptions may use to show that they have received the vaccine or have an approved non-pharmaceutical interventions	Used to clear an employee to be on-site	0001	General Routine Office Transitory Records	Official Record: Retain records for no longer than one year after their administrative use ceases.		FAQ 11 of the <a href="#">Policy: SARS-CoV-2 (COVID-19) Vaccination Program</a> states: How will I know if my co-workers or fellow Students are going unvaccinated? You probably won't know. Because vaccination-related information is private and confidential, the University will not disclose vaccine status of Covered Individuals except on a need-to-know basis; however third parties and some Locations may distribute badge attachments, stickers, pins, or other indicators that vaccinated individuals may use to show that they have received the vaccine.
26	Proof of vaccination, approved non-pharmaceutical interventions, proof those that are not vaccinated, or proof someone does not have approved non-pharmaceutical interventions	Indicators that those vaccinated or those with approved exceptions may use to show that they have received the vaccine or have an approved non-pharmaceutical interventions	Used to clear a student to be on-site at the location other than the medical arena.	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	FAQ 11 of the <a href="#">Policy: SARS-CoV-2 (COVID-19) Vaccination Program</a> states: How will I know if my co-workers or fellow Students are going unvaccinated? You probably won't know. Because vaccination-related information is private and confidential, the University will not disclose vaccine status of Covered Individuals except on a need-to-know basis; however third parties and some Locations may distribute badge attachments, stickers, pins, or other indicators that vaccinated individuals may use to show that they have received the vaccine.
27	Proof of vaccination, approved non-pharmaceutical interventions, proof those that are not vaccinated, or proof someone does not have approved non-pharmaceutical interventions	Indicators that those vaccinated or those with approved exceptions may use to show that they have received the vaccine or have an approved non-pharmaceutical interventions	Used to clear a student to be on-site at the location other than the medical arena.	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,	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	FAQ 11 of the <a href="#">Policy: SARS-CoV-2 (COVID-19) Vaccination Program</a> states: How will I know if my co-workers or fellow Students are going unvaccinated? You probably won't know. Because vaccination-related information is private and confidential, the University will not disclose vaccine status of Covered Individuals except on a need-to-know basis; however third parties and some Locations may distribute badge attachments, stickers, pins, or other indicators that vaccinated

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					Withdrawal or Cancellation Records, and Changes to Course of Study, Degrees, and Classes Records in systems that do not allow for systematic purging			individuals may use to show that they have received the vaccine.
28	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	
29	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			
30	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.		
31	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			
32	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	
33	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	
34	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	



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35	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.	comments section See citations in the UC Records Retention Schedule, in the comments section	
36	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	
37	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	
38	Testing Records	Test must be ordered by a licensed medical professional or pharmacist. Tests may only be conducted by a licensed medical professional or pharmacist. Will become part of the patient's medical record	At medical centers, Occupational Health, Student Health Centers	N/A	By Policy, records pertaining to individual patient care (medical records) are <b>not covered</b> in the UC Records Management Program, and therefore are not found in the UC Records Retention Schedule.	By Policy, records pertaining to individual patient care (medical records) are <b>not covered</b> in the UC Records Management Program, and therefore are not found in the UC Records Retention Schedule.		
39	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 an education record in accordance with FERPA. This can only happen with written consent of the student, unless the official has a "legitimate educational interest". EG:	0011A3	Student Records - Individual Student Admissions and Academic Records - Matriculated Students' Admission Application Records, Academic Advising Records, and Non-Permanent Student Academic Records	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	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
			records of leaves of absence, or withdrawal		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			
40	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 an education record 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	
41	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 an education record 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	
42	Testing Records	For students, to determine eligibility to	Results given to someone at the location other than the medical arena. This is	0011H	Student Records - Reasonable	Official Record: Retain records for 5 years after the end of the academic year in which the	See citations in the UC Records Retention	

Ref #	Type of Records	Description	Condition	Records Code	Records Category	Retention Period	Citations	Notes
		attend in-person classes.	an education record 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		Accommodations Student Records	student no longer attends the University.	Schedule, in the comments section	
43	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 an education record 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	