

Morningside University

RECORD RETENTION AND DOCUMENT DESTRUCTION POLICY

A. Purpose

This policy is to ensure that all of Morningside University's Official Records, as defined by this policy, are preserved, maintained or destroyed consistently and in accordance with the expectations of Morningside University. Morningside University preserves Official Records for the following purposes:

- ❖ To comply with all federal, state and local laws and requirements of professional accrediting bodies regarding the retention and disposition of Morningside University's records;
- ❖ To preserve the history of Morningside University; and
- ❖ To ensure adequate documentation in the event of litigation or an administrative agency charge.

B. Applicability

This policy applies to all faculty, staff and administrators who manage Morningside University's Records. This policy also applies to all student employees, independent contractors or volunteers whose work or service's for the university requires the management of Morningside University's Records.

C. Definitions

1. Records

Records are information fixed in any media, and include but are not limited to the following formats: paper and electronic documents, audio and video recordings, databases, emails and/or text messages.

a. Unofficial Records

Unofficial Records are not subject to this policy. Unofficial Records are:

- Private or personal documents that are not created or received in the course of Morningside University's business;

- Extra copies of Official Records. For example, for each official policy, there will be copies of this policy distributed to employees. Any extra copies are not Official Records. Also, printed copies of documents produced and stored electronically are considered unofficial.
- Faculty Records created or received in the course of faculty research or professional activities, such as interview or survey results, databases, or manuscript materials are not Official Records. Note that Records created or received by faculty in the course of teaching, advising, committee work, research administration or program, department or institution administration are Official Records under this policy.

b. Official Records

Official Records Are Records that are created or received in any format in the course of Morningside University’s business. Official Records are the property of Morningside University and must be maintained, preserved or destroyed in accordance with this policy. Official Records, include, but are not limited to: minutes, drawings, maps, computer data, machine readable data, reports, published materials, institutional policies and procedures, financial records, including invoices, journals, ledgers, purchase orders, grant documentation, personnel records, leases and contracts, land deed and easement files, patents, engineering drawings of Morningside University’s buildings, construction specification files, student records, and other records pertaining to fiscal information. Official records also include all emails sent from the Morningside domain and all emails received by Morningside accounts. If a document is written using electronic means, then the electronic version is the official version.” Official Records do not include Unofficial Records, as defined by this policy. As set forth in the definitions below, Official Records are classified by subject matter category (General, Legal, Financial, Student, etc.) and by the frequency of access to the Record that is required (Active, or Inactive).

Essential Records

Essential Records are a subset of Official Records. An Essential Record is a Record containing information essential to re-establish or continue Morningside University in the event of a disaster. Essential Records comprise the Official Records necessary to recreate Morningside University’s legal and financial status and to determine the rights and obligations of employees, customers, and citizens. Examples include personnel records, leases and contracts, land deed and easement files, patents, engineering drawings of Morningside University’s buildings, construction specification files, student records, and accounting records. Essential Records may be Active or Inactive.

Official Records Defined by Frequency of Access

All Official Records may be classified **either Active or Inactive**.

(a) Active Records

Active Records Are Official Records that continue to be used by the creating administrative department for conducting regular business and are maintained in active office files. Official Records remain Active Records for varying periods of time, depending on the purpose for which they were created.

(b) Inactive Records

Inactive Records Are Official Records that are not presently in use as Active Records. In general, Inactive Records could include organization charts, correspondence, minutes, architectural drawings, ephemeral documents, memorabilia, personal papers, meeting minutes, reports, correspondence, financial records, program records, documentation of events, images, audio/visual recordings, personnel files, news clippings, course files, topical files (unique to creating office), publications, artifacts, publicity, legal documents, student records, histories, and student papers. Inactive Records may be permanently retained even if there is no legal, regulatory, or management retention requirement (for example, historical records such as clippings, programs, and photographs). Consideration should always be given to the possible historic value of an Official Record when deciding its final disposition.

Official Records Defined by Subject Matter

All Official Records at Morningside University are also classified by the following subject matter categories:

(a) General Records

General Records Are Records created in the course of administering an office, department at Morningside University or Board of Trustees Records created in the course of administering Morningside University itself.

(b) Education/Student Records

Education/Student Records Are Records created when dealing with students, including but not limited to transcripts, disciplinary hearing files, student files or test score reports.

(c) **Financial Aid Records**

Financial Aid Records Are Records created during the administration of Title IV financial aid funding or any other financial aid programs, grants or scholarships. This includes all Records that must be maintained in accordance with the Federal Student Aid Handbook.

(d) **Personnel Records**

Personnel Records Are Human Resources and related Records created for employees and volunteers, including but not limited to personnel files, payroll records, employee medical records and workers' compensation files.

(e) **Publicity/Marketing Records**

Publicity/Marketing Records Are Records created when dealing with the public, the media or while conducting outreach activities, including but not limited to handouts, publications, maps, catalogs, or brochures.

(f) **Accounting/Financial Records**

Accounting/Financial Records Are Records created pertaining to the development and administration of Morningside University's budget and financial transactions, including but not limited to invoices, checks, insurance policies, audit reports or budget reports.

(g) **Regulatory/Compliance Records**

Regulatory/Compliance Records Are Records pertaining to compliance with applicable regulations, not otherwise covered in the categories set forth in this policy. For example, this includes but is not limited to the Occupational Safety and Health Administration ("OSHA"), hazardous waste disposal records and the Fair & Accurate Credit Reporting Act ("FACTA"). This does not include Records pertaining to compliance with workers' compensation, which would be covered by Personnel Records.

(h) **Security/Safety Records**

Security/Safety Records Are Records pertaining to Security, institutional crime, Cleary Act reporting, safety on campus, Safety Committee Records or any other Records pertaining to Security or safety at Morningside University.

(i) **Legal Records**

Legal Records Are Records created by an attorney for Morningside University or by Morningside University for the purpose of seeking legal advice on behalf of Morningside University.

(j) **Library Records**

Library Records Are Records created during the administration of Morningside University's Library including patron information, circulation records, Inter-Library Loan records. This definition does not apply to the holdings of the Library, whose retention and destruction is governed by LIBRARY POLICY.

(k) **Institutional Research Records**

Institutional Research Records Are Records pertaining to Morningside University's student composition, ranking, statistics, including surveys, US News & World Report rankings, and Integrated Postsecondary Education Data System surveys and reports.

2. File Breaking

File breaking is defined as the breaking or ending files containing Official Records at regular intervals, usually at the end of a year or other duration, to permit their destruction, or transfer to inactive storage areas in complete blocks. Regular breaking of files containing Official Records permits the establishment of new files and records series sequences within existing file space.

3. File Integrity

File integrity is defined as the principle that completeness, original file order, and unbroken custody of Official Records in a filing system must be maintained for a series of Official Records to maintain legal and intellectual integrity.

4. File Maintenance

File maintenance is defined as the application of records management principles and techniques to filing practices in order to maintain Official Records properly, retrieve them with efficiency, ensure their integrity, and make their regular disposition more practical.

5. Personally Identifiable Information

Personally Identifiable Information is defined as data or information that includes either the name of an individual or other family members, the individual's address, a personal identifier such as a social security number or identification number, or a list of personal characteristics, or other information that would make an individual's identity easily traceable.

6. Confidential Information

Confidential Information is defined as information that is protected as confidential by law, such as the Family Educational Rights and Privacy Act of 1974 (education records), or the Health Insurance Portability and Accountability Act's Privacy Regulations (medical records). As a matter of institutional policy, the definition of Confidential Information also includes:

- ❖ Personnel information,
- ❖ Purchasing records prior to the opening of bids, or prior to the award of contracts resulting from requests for proposals,
- ❖ Proprietary information, or
- ❖ Information Morningside University has contractually agreed not to disclose.

7. Record Retention Schedule

A Record Retention Schedule is a control document that describes the Records of Morningside University by subject matter category, establishes a timetable for the maintenance, storing or destruction of the Records, prescribes an ultimate disposition for the Records, and serves as the legal authorization for the disposition of Records.

8. Record Retention Period

A Record Retention Period is the length of time that a Record must be kept by law, or institutional policy. The Record Retention Period for each Official Record is given in Morningside University's Records Retention Schedule. The Record Retention Period may be designated as "permanent," "until superseded," "until obsolete (business need ceases)," or for a certain number of years or months.

D. **Responsibilities**

1. **Record Retention Coordinator**

The Payroll/Administrative Coordinator shall serve as Morningside University's Record Retention Coordinator. This person shall have responsibility for overseeing institutional compliance with this policy. The Record Retention Coordinator shall be responsible for ensuring that each department, committee or other subset of Morningside University conducts an annual audit to ensure that all Official Records are maintained in accordance with this policy. The Record Retention Coordinator shall have the authority to require periodic third party reviews of Morningside University's record retention and destruction practices.

The Record Retention Coordinator shall be responsible for ensuring that each department, committee or other subset of Morningside University prepares the Official Record Log in Appendix C for any Official Records in that department, committee or subset's control. The Record Retention Coordinator shall maintain a master log comprised of the information contained in Appendix C.

The Record Retention Coordinator shall also annually ensure that any vendors who use, maintain or store Official Records are complying with this policy, including the storage and destruction of Confidential Information and Personally Identifiable Information. The Record Retention Coordinator shall ensure that all vendor contracts contain provisions that require compliance with this policy.

Any questions regarding this policy shall be directed to the Record Retention Coordinator.

2. **Departments**

Each department will designate one person to serve as its Departmental Records Coordinator. The Departmental Records Coordinator will:

- ❖ Become knowledgeable about the Record Retention and Document Destruction Policy.
- ❖ Determine the disposition of departmental records according to the retention schedule.
- ❖ With the department manager, assure that the Records Retention Schedule adequately reflects the records and needs of the department, and suggest changes to the Records Retention Schedule as appropriate.
- ❖ Maintain records log and supply Record Retention Coordinator with annual updated form.

It is the responsibility of each departmental manager to be informed and adhere to the external requirements and guidelines while retaining and disposing of their departmental records.

3. Vendors

If departments, committees or other subsets of Morningside University, contract with outside vendors for record storage, imaging or destruction, such contracts shall ensure that vendors comply with this policy and the requirements set forth herein. Such contracts shall be reviewed by the Record Retention Coordinator.

4. Employees/Volunteers/Independent Contractors

Employees, volunteers and Independent Contractors are responsible for being familiar with this policy and for managing records in their possession, custody or control in accordance with this policy. These individuals may request guidance from the Record Retention Coordinator. Any employment or independent contractor contracts shall require compliance with this policy.

5. Failure to Comply with Responsibilities

All employees, independent contractors, volunteers or vendors who are subject to this policy may be subject to sanctions for violations of this policy, up to and including termination of employment, cancellation of contract or removal from Morningside University.

E. General Management of Records

In order to ensure compliance with this policy, all departments, committees or other subsets of Morningside University who are obligated to comply with this policy shall employ the following Record management practices:

1. File Breaking

Each Department shall determine an appropriate file break period (annually or at the end of a semester) for the department. Each department shall designate a responsible individual who shall ensure that file breaking is conducted in accordance with this policy.

2. File Maintenance (see Appendix A)

Each department shall designate a Departmental Records Coordinator who shall ensure that Official Records (whether active or inactive) in his or her department are maintained in a manner that ensures File Integrity, as defined by this policy. This designated individual shall also be responsible for ensuring that Official Records (whether Active or Inactive) are maintained in a manner that complies with the principle of File Maintenance, as defined by this policy.

3. Record Tracking

Each department shall ensure that each Official Record is included on the Official Record Log in Appendix C. This designated individual shall further be responsible for providing the Record Retention Coordinator with an updated Log at least annually. This designated individual shall be responsible for notifying the Record Retention Coordinator of the destruction of Records.

F. Record Retention and Storage

1. Format of Storage

Official Records shall be maintained in their original format, unless otherwise specified in this policy, the appendices or directed by the Record Retention Coordinator.

Financial Aid Records

In accordance with federal requirements, as set forth in the Federal Student Aid Handbook, Morningside University shall keep its Federal Student Aid (“FSA”) records in one of the following formats:

Original signed promissory notes and signed repayment schedules for Perkins Loans, National Direct Student Loans and National Defense Student Loans must be kept in a locked fireproof container until the loan is repaid or until Morningside University needs the originals to enforce collection of the loan.

If a loan is assigned to the Department of Education, records will be maintained in compliance with Federal laws.

Any imaged media format used to keep required records must be capable of reproducing an accurate, legible, and complete copy of the original document, and, when printed, this copy must be approximately the same size as the original.

2. Time Period for Storage

Official Records containing mixed Record Retention Periods should be retained for the longest Record Retention Period set forth in any applicable Record Retention Schedule. The Record Retention Periods are dependent on the particular department/area. Some are based on fiscal years (June 1 to May 31) and are exact retention periods, which means that the department must keep an Official Record as long as the Record Retention Period (minimum), but no longer (maximum). Never destroy a Record related to an ongoing/current litigation matter, criminal or civil investigation, or audit.

Education/Student Records

Morningside University shall keep all Education/Student Records in accordance with the principles set forth by American Association of Collegiate Registrars and Admissions Officers' Retention of Records: Guide for Retention and Disposal of Student Records.

Financial Aid Records

Morningside University shall keep Records relating to the school's administration of a campus-based program for three years after the end of an award year for which the aid was awarded and disbursed under that program. Morningside University must retain the Fiscal Operations Report and Application to Participate ("FISAP") containing reported expenditures and any Records necessary to support the data contained in the FISAP, including "income grid information," for three years after the end of the award year in which the FISAP is submitted. Morningside University must keep repayment Records for Perkins Loans, including Records relating to cancellation and deferment requests for at least three years from the date a loan is repaid, cancelled, or assigned to the Department. If a loan is assigned to the Department due to total and permanent disability, Morningside University must retain any loan-related documentation that it does not submit until the Department approves a final discharge or the loan has been paid in full. Records questioned in an audit or program review must be kept until the questions are resolved or until the end of the Record Retention Period, whichever is later

3. Place of Storage

a. Active Records

Unless otherwise specified in this policy, all Active Records not described in subsections (1) and (2) may be stored in a manner that ensures ease of access and security consistent with the stated goals of this policy.

(1) Active Essential Records

Active Essential Records should be stored in fireproof containers if possible.

(2) Active Records Containing Confidential or Personally Identifiable Information

Active Records containing Confidential or Personally Identifiable Information should always be stored on network shares hosted on Morningside servers. Such records should never be stored on C: or local hard drive of a desktop or laptop computer, floppy or Zip disk,

thumb/jump drive, CD-ROM or DVD. Mini-storage facilities, and off-campus personal or rental property of staff members, including garages, homes, mobile homes, trailers, etc., are NOT acceptable for storage of Active Records containing Confidential or Personally Identifiable Information.

b. **Inactive Records**

Storage areas for Inactive Records must be physically secure and environmentally controlled, to protect the records from unauthorized access and damage or loss from temperature fluctuations, fire, water damage, pests, theft, and other hazards.

Paper Inactive Records should be packed in standard cardboard “banker’s boxes.” Electronic Inactive Records shall be stored on network shares hosted on Morningside servers in folders specifically named with an expiration period: as “Inactive Storage 3 years.

(1) **Inactive Essential Records**

Hard copies of Inactive Essential Records should be stored in fireproof containers (if possible). These Records shall be stored in a manner that ensures they are easily accessible in the event they are necessary.

Electronic copies of Inactive Essential Records shall be stored on network shares hosted on Morningside servers in folders specifically named with an expiration period as “Inactive Essential Storage 5 years.

(2) **Inactive Records Containing Confidential and Personally Identifiable Information**

Inactive Records containing Confidential or Personally Identifiable Information should never be stored on C: or local hard drive of a desktop or laptop computer, floppy or Zip disk, thumb/jump drive, CD-ROM or DVD. Mini-storage facilities, and off-campus personal or rental property of staff members, including garages, homes, mobile homes, trailers, etc., are NOT acceptable for storage of Records containing Confidential or Personally Identifiable Information.

Electronic Confidential and Personally Identifiable Inactive Records shall be stored on network shares hosted on Morningside servers in folders specifically named with an expiration period as “Inactive Confidential Storage 7 years.

G. **Method of Disposition of Records by Category**

Any Official Records subject to destruction must be tracked using the Record Log in Appendix C. This log must be completed by the person responsible for the Official Record and a copy of the log shall be given annually to the Record Retention Coordinator. Official Records shall be destroyed or retained at the conclusion of the Record Retention Period set forth in this policy, as follows:

1. **Confidential Destruction**

All paper Records that have been designated confidential or that contain Confidential or Personally Identifiable Information and are subject to destruction shall be shredded. All Records that would pose a security risk or risk of identity theft shall be shredded. In the case of electronic records, the custodian will electronically purge all copies of the record in a manner that ensures destruction of all Confidential or Personally Identifiable Information. See the IT Director for further details about proper methods of electronically purging Records.

In the case of electronic Records, these Records shall be electronically purged in a manner that ensures they are not accessible on Morningside University's server and that ensures destruction of all Confidential or Personally Identifiable Information. See the IT Director for further details about proper methods of electronically purging Records.

2. **Destruction**

Unless otherwise provided herein, all other Records shall be recycled or electronically purged in accordance with the applicable Record Retention Schedule.

3. **Permanent records**

Depending on the format of the Official Record, the space available and the cost of maintaining the Official Record, the Department Records Coordinator shall determine whether the Official Record shall be physically preserved or digitally archived. The Department Record Coordinator shall further consider the frequency of access that may be required of the Official Record while it is stored. For example, Essential Records are more frequently accessed than Historic Records and thus should be maintained in a manner that ensures ease of access. Electronic Permanent Records shall be stored on network shares hosted on Morningside servers in folders specifically named as "Permanent Storage"

Records should be authorized for destruction by the senior officer of each administrative or academic office of origin after considering historic value and consulting with the Record Retention Coordinator. Essential Records should not be destroyed.

H. **Litigation Holds**

In the event that litigation or an administrative agency claim is reasonably likely to occur, Morningside University shall take all appropriate steps to initiate a litigation hold on all relevant Records so that this information can be preserved. If you believe that an event has occurred that is reasonably likely to lead to litigation/other claim, please notify the Vice President for Business and Finance immediately so that legal counsel can be consulted. Records that are subject to a litigation hold shall not be destroyed in accordance with Morningside University's standard destruction procedures. As such, upon initiation of a litigation hold, these Records must be immediately segregated from other records so they are protected from any routine Record purges. This is especially critical for emails or other electronic documents that may be subject to a computerized purge cycle. Please see the Record Retention Coordinator immediately if you have any questions about this procedure.

Litigation Hold Process

Upon notice of a litigation claim or a possible litigation claim the Record Retention Coordinator will notify all department record coordinators instructing them to suspend destruction of any relevant information. The Record Retention Coordinator will coordinate the production of all relevant requested information working with Legal Counsel and the Vice President for Business and Finance.

Appendix A

Department File Maintenance Procedures

Records Inventory

Each department which generates Official Records shall maintain a records inventory which classifies the records in the following areas:

- General Records
- Education/Student Records
- Financial Aid Records
- Personnel Records
- Publicity / Marketing Records
- Accounting / Financial Records
- Regulatory / Compliance Records
- Security / Safety Records
- Legal Records
- Library Records
- Institutional Advancement Records

The inventory shall also show where the record is stored (Location and box number) along with the applicable retention period. (See appendix C). The inventory record log needs to be updated annually and sent to the Records Retention Coordinator.

Record Storage Process

Each department shall store records in an appropriate manner which complies with this retention policy. Records shall be stored in a secure location which limits access to records to only those approved within each department. Special access controls need to be implemented for confidential records to assure their confidentiality. Record storage suggestions:

- ❖ Only store Official Records if possible. This eliminates unnecessary records taking up space.
- ❖ Put contents in boxes in chronological order grouped by type of record and records with similar retention periods.
- ❖ Label boxes – A-1; Department Name; Retention Period
- ❖ Prepare a list of contents in each box by Box Number.
- ❖ Specifically mark material which is confidential as such on the box.
- ❖ Have Facilities Department move the contents to storage location.

Record Removal Process

Temporary Removal

Each department shall implement an appropriate process regarding the removal of records from storage. It is recommended that a record sign-out sheet be completed which informs the Department Record Coordinator who has the record and when it was removed. At the time a record is returned, it should also be noted on the sign-out sheet.

Record Destruction

Each Department Record Coordinator shall annually determine which records could be destroyed based on the record retention policy. Before any record is destroyed it should be approved by the supervisor of the department and the Record Retention Coordinator. Records should be destroyed as directed within this policy.

Electronic Records

Please refer to the University's Guidelines for Preservation of Electronic Stored Information and Responding to Discovery Demands (Appendix B) for a more detailed discussion of Electronic Record handling procedures.

Email Retention and Disposal Policy

All emails sent from the Morningside domain and all emails received by Morningside accounts are official records and need to comply with this policy.

The custodian of an email message will be the originator if that person is a University employee; otherwise, it will be the individual to whom the message is addressed once the message is received. The custodian is the person responsible for ensuring compliance with this policy. Custodians of email with Confidential and Personally Identifiable Information need to ensure compliance with applicable laws.

Email may not be stored on local clients and must be stored on Morningside hosted servers where they will be disposed of in accordance with the University's disposition schedule for records as set forth below.

Email older than five (5) years will be automatically deleted unless the custodian has taken action to archive these messages in another format. The custodian is responsible for preserving records including email, not withstanding any backup by the computer network.

If the custodian of the email leaves employment, it is the responsibility of the relevant department head to ensure that any email remaining on the computer is retained or disposed of in compliance with this policy.

Scanned Records

In order to eliminate paper; save storage space; and improve document retrieval time; records may be scanned using a program called Laser fiche. It is recommended that long term or permanent retention period records be scanned as much as possible. The access controls and destruction maintenance of these records need to follow the retention policy guidelines. The scanned image will then become the official document.

Appendix B

Morningside University Guidelines for Preservation of Electronically Stored Information and Responding to Discovery Demands

Preservation

When Morningside University “reasonably anticipates” litigation, through the receipt of notification or other information identifying the possibility of an administrative complaint, a lawsuit or upon the actual service of a summons and/or complaint (“notification”), the University will take action to preserve all electronically stored information that may be relevant to the claim. The following guidelines are intended to ensure timely and accurate preservation and collection of such data.

1. As soon as practicable after notification that litigation is reasonably anticipated, the Vice President for Business and Finance will issue a legal hold letter to all those who are identified as potentially having relevant information and notify the Information Technology (IT) Department of the potential or actual claim.
 - a. The following information will be provided:
 - i. Names of plaintiff(s), defendant(s), and any other known relevant parties and witnesses (i.e., those who may control or possess potentially relevant data);
 - ii. Department(s) involved; and
 - iii. Timeframe for data preservation.
2. IT will take immediate steps to preserve all data stored electronically (electronic mail, calendar, etc.).
3. As soon as practicable, legal counsel, the Vice President for Business and Finance and IT will meet to discuss the case and develop an initial course of action. Together they will:
 - a. Identify the set of electronic data that must be preserved; and

- b. Discuss mechanisms, process, and other circumstances that may be particular to the specific lawsuit.
4. If deemed appropriate under the circumstances, IT may send out end-user questionnaires to all affected individuals for completion and return to IT so that IT can identify all potential locations of electronic data.
5. Legal counsel or the Vice President for Business and Finance will send specific information-handling instructions as may be appropriate in a particular matter to all affected individuals to ensure existing electronic data are appropriately preserved and easily retrievable.
6. IT will store all collected electronic data centrally for future potential retrieval and discovery.

Discovery

Upon receipt of a discovery request for electronic data pertaining to a lawsuit, counsel will work with the Vice President for Business and Finance and IT to develop an appropriate response. The response may be to supply the requested information, attempt to obtain a modification of the request as to a different set of data or search terms, or to decline to provide some or all of the requested data based upon expense or other basis.

During the discovery phase:

1. Legal counsel, the Vice President for Business and Finance, and other managers as appropriate will meet with IT to inform them of specific requirements (search terms, data type, timeframe, etc.).
2. IT will determine whether the set of preserved electronic data is sufficient to meet the requirements of the discovery request and will notify legal counsel and the Vice President for Business and Finance of any extraordinary circumstances, costs of compliance, or other concerns.
3. If IT determines that the preserved electronic data is not sufficient to meet the requirements of the discovery request, IT will so inform legal counsel and the Vice President for Business and Finance and await further instruction.
4. IT will perform searches on the preserved electronic data specific to the outlined requirements.
5. IT will supply the retrieved electronic data to legal counsel.
6. Legal counsel will review the retrieved electronic data to determine legal relevance, privilege, or other protected status, and will handle discovery.

End of Litigation

Legal counsel will notify the Vice President for Business and Finance, who, in turn, will notify IT and the impacted employees in writing once the legal hold is no longer required so that the electronic data will be treated as appropriate under the Morningside University Record Retention and Document Destruction Policy.

Appendix C

Retention Periods

Document	Retention Period
GENERAL RECORDS	
Articles of Incorporation, Charter, Bylaws, minutes and other incorporation records	Permanent
Contracts (still in effect)	Permanent
Contracts, mortgages, notes and leases (expired)	10 years
Correspondence (general)	3 years
Deeds, mortgages, bills of sales, easements	Permanent
Insurance policies, records, current accident reports, claims (still in effect)	Permanent
Insurance policies, records, accident reports, claims (expired)	7 years
Trademark registrations and copyrights, patents and related papers	Permanent
Licenses	ACT + 6 years
Policy Statements	10 years
Board of Directors Materials	Permanent
Original Exemption Application & Determination Letter	Permanent
Building, Facilities & Related Records	Permanent
Blueprints	Permanent
Book & Textbook Orders	7 years

Construction Documentation	Permanent
Grant Proposals - rejected	Permanent-summary of materials, 3 years-detail
Grants - funded	Permanent
Fact Book	Permanent
Farm Files	Act +7 years
Charitable Trust Files	Permanent
Property Files	Act +7 years
Endowment Investment Files	Permanent
Endowment Gift Files	Permanent
Bond Documents	Permanent
Motor Vehicle Records	Act +1 year
EDUCATION / STUDENT RECORDS	Retention Period
Student billing sheets	5 years
Student loan rosters	5 years
Student loan promissory note and related documents	10 years from date loan is assigned, canceled or repaid
Accounts receivable Student Files	7 years
Collection Records	Act + 4 years
Uncollected Accounts	4 years
Acceptance Letters	1 year after application term
Applications	1 year after application term
Correspondence	1 year after application term
Entrance Exams and Placement Scores	1 year after application term

Letters of Recommendation	Until beginning of term
Applicant Statistics	5 years
Degree Statistics	10 years
Enrollment Statistics	10 years
Grade Statistics	10 years
Job Placement Statistics	5 years
Racial/Ethnic Statistics	5 years
Academic Records (Transcripts)	Permanent
Class Schedules	5 years after date of last attendance
Course Drop/Add Slips	5 years after date of last attendance
Date of Graduation and Degree Award	Permanent
Degree Audit Records	5 years after date of last attendance
Disciplinary Files	5 years after date of last attendance
FERPA Requests	5 years after date of last attendance
Foreign Student Data Records Including I-20 Forms	5 years after date of last attendance
Health/Immunization Records	6 years
Name Change Authorizations	5 years after date of last attendance
Pass/Fail Requests	5 years after date of last attendance
Personal Data Forms	5 years after date of last attendance
Registration Forms	5 years after date of last attendance
Teacher Education Program Files	Permanent
Transcript Requests	1 year
Transfer Credit Evaluations	5 years after date of last attendance
Accreditation Information	Permanent

Syllabus	Current + 1 year
Rank, Promotion & Tenure Committee Documents	Permanent
Faculty Contracts	Act + 8 years
Faculty Evaluation Documents	Act + 4 Years
Faculty Correspondence	Act
Student Correspondence	Act
Honors & Award Files	Permanent
Examinations	Current year used + 1
Grades for Specific Courses	Current year used + 1
Handouts	Current year used + 1
Completed Exam, Graded Assignments	1 semester after course completed
Teacher Certifications	1 year after certification
Continuing Education program & participant records for conferences/ workshops/wellness programs	Act + 5 Years
Faculty Meeting minutes, correspondence, motions	Permanent
Course Evaluations	5 years after faculty separates from University
Grades	Permanent
Catalog	Permanent
Graduation Lists	Permanent
Petition to Graduate	1 year after graduation
High School/other University transcripts	5 years after graduation or date of last attended
Registration forms	Retain for 1 year after date submitted after checking with Business Office

Transfer Credit Evaluations	5 years after graduation or date of last attended
Veterans administration certifications	3 years after graduation or date of last attended
Withdrawal Authorization	2 years after graduate or date of last attended
Attendance Sheets	5 years after the term
Requests for Formal Hearings	Permanent
Requests and Disclosures of Personally Identifiable Information	Permanent
Student Statements on Content of Records regarding Hearing Panel Decisions	Until terminated by student or Permanent
Waivers or Rights of Access	Until terminated by student or Permanent
Written Decisions of Hearing Panels	Permanent
Institutional Research	Permanent
Prospect Inquiry Information	Active through recruitment cycle
Catalogs from other school	3 years if not being used
Athletic Physicals	Act + 5 years
Student Proof of Insurance	Act + 5 years
Counseling Session Notes	Act + 4 years
Advising Files	Graduation + 1 year
Class Lists	Permanent
Instructional Materials	Until Obsolete
Student Academic Records	Permanent
Student Petitions	Permanent

Student Surveys Summaries	Permanent
Accreditation Issues	10 years
FINANCIAL AID RECORDS	Retention Period
Applications (SAR or ISIR)	3 years after the end of the year in which the aid is awarded and disbursed
Campus-Based Financial Aid (SEOG, Federal Work Study, Perkins Loan) and Pell, ACG and SMART Grant Records	3 years after the end of the year in which the aid is awarded and disbursed
FFEL Records Related to Borrower's Eligibility and Participation	3 years after the end of the year in which the aid is awarded and disbursed
Financial Aid Awards	3 years after the end of the year in which the aid is awarded and disbursed
Financial Aid Transcripts	3 years after the end of the year in which the aid is awarded and disbursed
Fiscal Operations Report (FISAP) and supporting records	3 years from the end of the award year in which the report was submitted
Perkins and Institutional Loan Repayment Records (including Cancellation and Deferment Records)	3 years from the date on which a loan is assigned to the Department of Education, cancelled or repaid
Perkins and Institutional Loan Original Promissory Notes and Original Repayment Schedules	3 years from the date on which a loan is assigned to the Department of Education, cancelled or repaid
Financial Aid Federal Reports	Act + 5 years
Perkins Loan Checks	7 years
Perkins Loan General Files	5 years
Perkins Loan Borrower Files (After paid-in-full)	5 years

Perkins Loan Reconciliations	5 years
Stafford & Parent Plus Loan (loan proceeds)	7 years
Student loan Funds - Acctg ledger	Permanent
Student Loan Promissory Notes	10 years
PERSONNEL RECORDS	Retention Period
Benefit reports and rosters (health, flex, life, etc.)	8 years
Payroll Checks	7 years
Payroll Reports	7 years
Payroll – YTD check register – microfilmed	7 years
Payroll – YTD register –student & regular – Microfilmed	7 Years
Payroll – Deduction history report	7 years
Payroll – Employee Master report – Microfilmed	7 years
Timecards	7 years
Workers Compensation - Individual Files	30 years
Flex - Employee Election Forms & Disbursements	7 Years
Health Insurance Premium	7 Years
Long Term Disability	7 Years
TIAA-CREF records	7 Years
Applications	1 year
COBRA Documents	7 Years
I-9 forms	3 years
Job Announcements	1 year
Individual Personnel Files *	Act + 7 years

Personnel - Personnel Master Print - Student & regular	7 Years
FMLA Documents	3 years
Year-End Reports (unemployment, accruals)	7 Years
Employee Manuals	10 years
Office Correspondence	3 years
Employment Contracts & Settlement Agreements	Act +7 years
Employment applications	3 years from making the record/ personnel action
Background Investigation Results	3 years from date individuals who were not hired are notified position is filled
Reference Check Notes	3 years from date individuals who were not hired are notified position is filled
Resumes and Letters of Recommendation	3 years from date individuals who were not hired are notified position is filled
CUPA Salary Report	10 years
Faculty Handbooks	Permanent
Occupational Injury and Illness Records	30 years
Employment Applications & Resumes – Not Hired	1 Year from date position was filled
Student Earning Records	7 Years
PUBLICITY / MARKETING RECORDS	Retention Period
Press releases	Permanently
University Newsletters	4 years
Directories (Phone) – Employee or Student	4 years
Student Newspapers	4 years
News Clippings/Event Information/Brochures	Permanent

Event Photos & Slides	Permanent
Commencement Programs	Permanent
Announcements	Permanent
Circulars	Permanent
Flyers	Permanent
Memorabilia	Permanent
ACCOUNTING / FINANCIAL RECORDS	Retention Period
Inventory records	7 years
Accounts Payable - check recon report - Microfilmed	7 years
Accounts payable - voucher summary - Microfilmed	7 years
Check register	7 years
Accounts Payable Checks / Invoices	7 years
P-Card Reports	3 years
Purchase Orders	7 years
Purchase Order Report - Microfilmed	7 years
Purchasing - Vendor File analysis - Microfilmed	7 years
Bank Cancelled Checks - CD	9 years
Accounts receivable records - Microfilmed	7 years
Accounts Receivable - invoice register - Microfilmed	7 years
Accounts Receivable Invoices	7 years
Cash receipts & balance sheets	3 years
Cash receipt register - Microfilmed	7 years
Athletic & HPER deposit records	3 years
Daily deposit tickets & receipts	3 years

General ledger - detail list - Microfilmed	7 years
Chart of Accounts analysis - Microfilmed	7 years
Journal Entry List - Microfilmed	7 years
Bank Reconciliations / Bank Statements	7 years
Daily cash analysis	3 years
General Ledger & End-of-year Trial Balance	Permanent
Journal Entries	7 years
Fixed Assets	Permanent
Depreciation Schedules	Permanent
Daily Gift Transmittal	3 years
Audit Reports	Permanent
Audit Work papers	5 years
Investment records	Until Sold
Investment Consultant reports	11 years
Fixed Asset Sales	4 years
Banking and Custodial Agreements	Permanent
Office Correspondence	3 years
Board Books	Permanent
REGULATORY / COMPLIANCE RECORDS	Retention Period
Documents relating to exempt status	Permanent
FISAP, Dept. of Ed, HHS Reports	5 years
1098 Ts	3 years
W-9s from Venders	3 years
W2 forms	7 years

W-4 forms	7 years
941 Tax Returns	7 years
Material Safety Data Sheets	30 years
5500 Tax Returns	7 years
Permits	Act + 1 year
990 Tax return	7 years
1099's	7 years
Hazardous Waste Records	5 years
SECURITY / SAFETY RECORDS	Retention Period
Accident Reports	6 Years
Fire Inspection Reports	6 Years
Insurance Safety Consultation Reports	Permanent
Monitoring Reports for Hazardous Chemicals	Permanent
Safety Records / Reports	6 years
Campus Crime Reports and Supporting Documentation	7 years
Safety Committee Minutes	6 years
LEGAL RECORDS	Retention Period
Correspondence (legal and important matters)	Permanent
Claims	25 years
Attorney Opinion Letters (property)	Permanent
Legal Case Reports	Act + 7 years
Waiver Release Forms	2 years
LIBRARY RECORDS	Retention Period

Library Acquisition Orders	Act + 1 Year
Interlibrary Loan Documents	Act + 4 years
INSTITUTIONAL ADVANCEMENT RECORDS	Retention Period
Donations and funded grants	7 years
Alumni Newsletters	4 years
Alumni Records	4 years
Annual Report	4 years
Annuity Agreements	ACT + 4 years
Donor Correspondence	Permanent
Endowment Agreements	Permanent
Gift Records	Permanent
Trust Agreements	Permanent
(Grant) Restricted Contribution Notification Letters	Permanent
(Grant) Unrestricted Contribution Notification Letters	3 years
Scholarship Files	Permanent
Correspondence, General & Alumni	Permanent
Contribution Notification/ Tax Receipt Letters	Permanent
Reconciliation Reports	8 Years
Fundraising Reports/ Campaign Reports	Permanent

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