
ADM 412
Security Policy #12
Records Retention and Destruction Policy

Overview

This policy and procedure provides for the systematic review, retention and destruction of documents received or created in the transaction of McPherson College (“College”) business. The policy is designed to ensure compliance with some federal and state laws and regulations.

It is the policy of the College to ensure that its records are preserved to provide documentation of the College’s history and to be retained for the periods of time necessary to satisfy the College’s business and legal obligations. The records will be disposed in accordance with an established records retention and disposition schedule. Certain records are permanent records and may never be destroyed. Once a record has met its retention time period, the college has two additional years to dispose of the record according to the Gramm, Bliley, Leach Act (GLBA).

Each department or office on campus will be responsible for creating and maintaining a record retention and destruction policy. All departments will appoint a Records Custodian who will be responsible for implementing the policy.

Definitions

Record

A record is anything containing information reflecting College educational and business transactions regardless of format (paper, digital, photographic, recordings, etc.). Typical records include official publications, fiscal data, incoming/outgoing correspondence including email, meeting minutes, reports, student files, and employee files.

Active Records

Records that are generally referred to once a month or that are needed to support the current business activity of an office or division.

Inactive Records

Records that have not been needed for at least one year or for which the active period has passed.

Permanent Records

Also known as archival records, permanent records have historical, administrative, or research value to the College and the College will keep these records indefinitely.

Retention Schedules

An internal document describing categories of records, providing a length of time they should be kept and includes instructions. The retention schedule for McPherson College is included in this document.

Retention Period

Minimum required length of time for which a College office or department is responsible for maintaining records.

Records Destruction

The physical or electronic destruction of a record after it has become obsolete or otherwise in accordance with this policy.

Disposition of Records

The terminal treatment of records, either through destruction or permanent storage.

Records Custodian

Each college department or office will assign a records custodian who will have the responsibility for ensuring effective implementation of the policy in his or her area.

Litigation Hold

A communication issued as the result of current or anticipated litigation, audit, and government investigation or other similar matter that suspends the normal process regarding the retention and disposition of College records.

Policy Details

Paper Files

Many of the records kept by McPherson College are in hard copy form, kept in paper files. These files may include student, parent, or employee information. It is up to each department to determine what action is necessary to secure the files. This may include locked filing cabinets, fire proof filing cabinets, securing behind locked doors, or in one of the college's vaults.

Employees are expected to exercise judgment regarding the content and purpose of a paper file in determining whether it needs to be retained as a College record, and, if so, the length of the retention period. Any questions about retention of paper files should be directed to the Records Custodian in each department or office.

Email

Email sent or received over the College's computer system may constitute a form of College record. While not all emails are business records, all College emails are property of the College and are subject to discovery in the event of litigation against the College or any of its employees or students. Consequently, the administration has the ability and the right to view the email of all members of the College community.

Faculty and employees of the College are not obligated to retain all emails indefinitely; such a policy would clearly impose an impossible burden both on the College community and on the College's computer network. Rather, individual employees and faculty members are expected to exercise judgment regarding the content and purpose of the email in determining whether it needs to be

retained as a College record, and, if so, the length of the retention period. Any questions about retention of email should be directed to the Records Custodian in each department or office.

Electronic Documents

Information saved electronically on a college computer or network may be considered a College record. While not all electronic documents are College records, all documents stored on College computers or networks are considered College property and are subject to discovery in the event of litigation against the College or any of its employees or students. Consequently, the administration has the ability and the right to view the electronic files of all members of the College community.

Faculty and employees of the College are not obligated to retain all electronic documents indefinitely; such a policy would clearly impose an impossible burden both on the College community and on the College's computer network. Rather, individual employees and faculty members are expected to exercise judgment regarding the content and purpose of the document in determining whether it needs to be retained as a College record, and, if so, the length of the retention period. Any questions about retention of electronic documents should be directed to the Records Custodian in each department or office.

Litigation Holds

Where the College has actual notice of litigation or of a government investigation or audit, or has reason to believe that such events are likely to occur, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In such event, the College will take steps to identify all paper and digitally maintained files that may contain documents relevant to the case, including emails. The department head of an affected department or office will be notified and will notify members of their office to preserve such documents indefinitely. If an employee or faculty member receives such a preservation notice, it does not necessarily mean that they are involved in the litigation or investigation. Rather, it means that the evidence that the College is required to preserve may be in the employee or faculty member's possession or control, and that the employee or faculty member has an obligation to preserve such information effective immediately. In the event of a litigation hold, all policies for the disposition of documents must be suspended with respect to those matters that are the subject of the hold. Electronic information should be preserved in its original electronic form on the media on which it is stored. Electronic information should not be transferred from the media on which it is stored to a different media for the duration of the litigation hold **unless** such transfer is necessary to preserve the integrity of the information for the duration of the hold, and such transfers should be made only after consultation with the IT department to preserve the integrity of the electronic data. In addition, the employee and/or faculty member that receives the notice should similarly preserve any new information that is generated that may be relevant to the litigation or investigation by saving it in a segregated file. A staff or faculty member's failure to preserve documents after having received a preservation notice can have extremely serious consequences for the College. Accordingly, a failure to comply with a litigation hold will subject employees to discipline, up to and including termination, and will be deemed misconduct that will subject faculty members to discipline in accordance with the appropriate Handbook.

Procedures

Essential Functions of Records Custodians

Each department has the responsibility for designating a Records Custodian and ensuring that the Custodian understands and is following with the records retention requirements applicable to that particular unit. The college is beginning to sign off the destruction of documents at the conclusion of their retention period.

The Records Custodian is expected to: understand the records created within the department or office; follow this policy to make decisions on retention and disposition of records and provide guidance to others who are involved in preparing records for storage; be responsible for ensuring that everyone in the office is aware of this policy; establish the level of confidentiality and security appropriate to specific types of records and help the department or office maintain and monitor confidentiality and security.

Accessibility and Safekeeping of Records

Records, especially financial records, must be easily retrievable for examination by authorized individuals, including auditors. Access to electronic records is subject to College rules regarding information security. Records Custodians should work with the IT department to ensure that electronic documents are maintained in a format that preserves accessibility.

Disposition of Records

1. The Records Custodian is responsible for periodically determining which College records in their particular office or department have reached the end of their retention period and should therefore be destroyed.
2. The Records Custodian is required to sign off on the destruction of documents.
3. Paper records must be shredded or other arrangements must be made for the documents to be destroyed.
4. The Records Custodian should consult with the IT department regarding the destruction of electronic documents.

Records Destruction

Records should be securely maintained for the period of retention either in the office or department where they were created or used. Records that may be destroyed at any time include:

- material that is not considered a “record” (see definition of record);
- duplicates of an official copy which is stored and retained by another office such as personnel records, financial and budget information, copies of information used in an employee search;
- records that have served their purpose and are no longer needed such as drafts of reports, and notes that have been turned into meeting minutes.

When there is doubt about whether or not a record may be destroyed, the Records Custodian and/or their supervisor should review the retention schedule.

Destruction includes:

Recycling – generally appropriate for public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts of policies or other memoranda which are not confidential.

Shredding – using a cross-cut shredder for all documents that should not be read by others after they are no longer needed. This is essential for any document containing personal information, information that is student protected information under FERPA, health related information, or financial information.

Discipline:

Failure to follow this policy will subject employees to discipline up to and including termination

of employment, and will subject faculty to discipline in accordance with the Employee Handbook, except in the case of guest faculty, who are subject to discipline in accordance with the guest faculty member's contract.

General Retention and Destruction Schedule Statement

This schedule applies to all types of records, regardless of media or format, including documents, email, photographs, audiotapes, videotapes, CDs, and DVDs. Retention periods reflect minimum time periods. Records may be retained for longer periods of time at the discretion of the custodian or as required by legal counsel. Do not destroy any records while they are subject to audit or investigation.

Records that are in storage areas such as basements or attics are often at risk of water damage or destruction and should be evaluated in light of this schedule.

McPherson College is committed to providing researchers with the material they need. However, due to the confidential nature of certain records, access to some materials may be limited. Restrictions are placed on the use of records in order to protect the rights to privacy of individuals and the institution.

Access restrictions to records are divided into three categories:

General Distribution

Records in this category are open without restriction. Records in general distribution are the publications issued to the general public at the time of their creation, such as announcements, official college publications, calendars, brochures, and committee reports. This also includes the College

charter, history and description of the College, building and grounds, visiting speakers, endowed chairs and professorships, College events and commencements, degrees, honors, awards and prizes, public relations, conferences, academic programs, and graduate programs. After processing, records of this type are open immediately without restriction. *Examples:* Annual Report of the President, General Committee meeting minutes, photographs.

Restricted Distribution

Records in this category are restricted, but access may be granted depending on the request. Records in this category may contain personal information regarding students, parents, present or past employees. These records are stored in locked cabinets, offices or rooms, or may be stored in a database that requires a password to access. In order to access these records the requestor will need to show a legitimate need to view the information. *Examples:* Student Financial Aid information or Employee Compensation data.

Permission to examine does not imply the right to publish any part of a document.

General Retention and Destruction Schedule

General Type	Description	Retention Period	Location
Board of Trustees Records	Meeting minutes, agenda, reports, proposals, and supporting documentation	Permanent	President’s Office
Articles of Incorporation	Includes the documents the College is chartered under and the by-laws	Permanent	Business Office
IRS Determination Letter	IRS Determination Letter	Permanent	Business Office
Legal Records	Documentation of legal cases involving the College	Permanent	Department Records Custodians and/or HR
Grievance Files	Documentation of grievances initiated by faculty and staff	Retained as long as personnel file is retained.	HR and/or Academic Affairs
Environmental Reports/OSHA Investigations	Investigation documentation or reports	Permanent	Facilities

Insurance Policies	All policies in effect on behalf of the College, students, faculty and staff	Maintain as long as active	Business Office
College Tax Records	Documentation of the College's compliance with tax filing requirements	Permanent	Business Office
External and Internal Audit Records	Created by internal or external auditors to document their reviews, findings and recommendations	Permanent	Business Office
Real Property Leasing/Rental Records	Documentation of the lease and rental of property	Retain 7 years after expiration of the lease.	Business Office
Social Security Reports and Deposits	Periodic reports of wages and social security contributions paid by the College to each employee	Retain for 7 years	Business Office
Unemployment Compensation Benefit Files and Reports	Documentation on eligibility of former employees for unemployment benefits and when these employees receive compensation charged against the College's account	Retain for 5 years	HR and/or Academic Affairs
W-2 Listings	Documentation of salaries paid and taxes withheld for employees	Retain for 7 years	Business Office
Authorization/Allocation Letters	Awards of federal financial aid to the College	Permanent	Financial Aid

Payroll Records	Documentation of payroll, payroll deduction authorizations, garnishment records, pre-payroll reports and payroll check registers	Retain 7 years after termination	Business Office and/or HR
Time Sheets	Documentation of hours worked by employees	Retain for 7 years	Business Office
Bank Records	Transactions recorded in the College bank accounts and their reconciliation to the general ledger.	Retain 7 years after end of fiscal year	Business Office
Employee Benefit Plan Files	Documentation on employee enrollment in benefit plans	Retain 7 years after termination of employment.	HR
Staff Appraisals, Promotion, Demotion and Discharge Documentation	Records documenting periodic evaluation, work performance and employment record of College staff	Retain 7 years after employee separation from College	HR
Enforcement – Campus Incident Reports	Documentation of incidents that occur on campus that violate College and/or local laws and regulations. They contain case number, arrest report, incident report, date, time, complainant, address and details of the report (IAW Cleary Act)	5 years after graduation or separation	Student Life Office

Financial Records

General Type	Description	Retention Period	Location
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Financial Records – General	Budget worksheets, printouts, account books, ledger, purchase records, purchase orders, travel expense reports	7 years following the activity.	Business Office
Financial Records- Debt Financing	All documents related to debt financing	Permanent	Business Office
Financial Documentation	Tuition and fee info, annual endowment fund reports, annual financial statements	Permanent	Business Office and/or President’s Office
Annuity Records	Records pertaining to the management of annuities	Permanent	Business Office

General College Records

General Type	Description	Retention Period	Comments
Academic Committee Records	Minutes, reports and other materials generated by College-wide committees including charges, substantive correspondence and work product, and reports and documents about or related to the operation of college-wide committees or other offices around the College.	Permanent	Academic Affairs and/or President’s Office
President’s Records	Records related to proposals, historical	Permanent	President’s Office

reports and notes from meetings

Student Records

General Type	Description	Retention Period	Location
Student Records – Admission Files	Application records for admission to the College created for undergraduate, graduate applicants.	Permanent Registered students. Retain 2 years: Unregistered applicants.	Admissions Office and/or Academic Records Office
Student Records – Registrar	The files may include personally identifiable information (pii), academic transcripts, academic disciplinary information and evaluations.	Permanent	Academic Records Office
Student Records – Graduation Lists	Lists of individuals who have successfully completed the degree requirements and have been graduated from the College	Permanent	Academic Records Office
Student Records – Registration	Documentation of a student’s course registration and changes to registration	Transactional; may be purged upon graduation or separation.	Academic Records Office
Student Records – Financial Aid	Records showing evidence of providing financial aid including financial aid applications, federal student aid forms, federal tax forms,	5 years after graduation or separation.	Financial Aid Office

	award letters and confirmations, verification records, interview records, students scholarships, fellowships and awards		
Student Records – Health Services	Records include medical as well as mental health histories, clinical notes, immunization records, and related correspondence.	5 years after graduation or separation.	Student Life Office
Student Records – Student Discipline	Records relating to proceedings and decisions resulting from violations of the student conduct code, honor code, or other College policies	Suspensions and expulsions retained with the student’s permanent record. All other, retained 5 years.	Student Life Office
Student Records – Athletic Participation	Records, including photographs, awards, etc. related to student participation in athletics. There is a permission form athletes sign their first semester which grants college the ability to release GPA information for awards.	This form should be retained as FERPA information, which requires MC to uphold until death of student/graduate.	Database/Athletics
Student Records – Activities and Government	Records related to student participation in special activities, student clubs, associations, and the Student Senate. Records related to any student organization or club.	Undefined period	Database
Student Records – Career Counseling Office	Records related to an individual student such as counseling notes and letters of recommendation.	5 years after graduation or separation.	Student Life Office

Personnel Records

General Type	Description	Retention Period	Comments
Employee Recruitment	Applications, Resumes, Position Announcements, Advertisements, Promotions, Opportunities to work overtime	1 year from date of personnel action to which any record relates	HR and/or Business Office
Employee Selection	Employment Tests, Physical Exams, Training Agreements, Hiring Documents, Records regarding Promotion, Demotion, Transfer, etc	1 year from date of action to which the record relates. Training Docs- 3 years from the training program completion	HR and/or Business Office
	I9s (separate from official personnel file)	Retained for three years after initial date of hire, or one year after the date employment ends—whichever is later.	
Employee Compensation	Payroll records, Individual Contracts, Wage and Rate Tables, Work-Time Schedules, Child Labor Law Info,	7 years from date of termination	HR and/or Business Office
Employee Compensation	Tax Withholdings	4 years from date of filing tax return/report	HR and/or Business Office
Employee Benefit Plans	Plan information	Duration of plan and for at least 1 year after plans' termination	HR and/or Business Office
Discrimination Charge Investigations	Internal Complaints and terminations	1 year from termination	HR and/or Dean of Students
Discrimination Charge Investigations	Personnel Records concerning charges	Until final disposition of the charges	HR and/or Dean of Students
Discrimination Charge Investigations	Employment Records related to individual with disability	1 year from the date the record is made or the personnel action	HR and/or Dean of Students

		involved is taken, whichever occurs later	
Discrimination Charge Investigations	Personnel Record for anyone who's employment was involuntarily terminated	1 year from the date of the termination	HR and/or Business Office
Employee Leave of Absence	Payroll information, FMLA records, FMLA policies	3 years from date the leave ended	HR and/or Business Office
Faculty Professional Papers	Records related to faculty teaching, curriculum, committee work, or biographical materials	Permanent	Faculty members are encouraged to contact the College Archives upon retirement because these records often have permanent value to the College.
Faculty Tenure and Promotion	All records related to appointment and subsequent history of individuals to join the faculty, including correspondence	Permanent	Academic Affairs Office

Advancement Records

General Type	Description	Retention Period	Location
Constituent Records	Includes personal information about alumni, donors and friends of the college. Giving history, newspaper clippings and correspondence.	Permanent	Advancement/Alumni Office

Faculty Group Records

General Type	Description	Retention Period	Comments
Faculty Group Records – General Office Records	Records related to the routine daily administration of the department including	Until no longer administratively useful.	Stored by each faculty group

memoranda, meeting minutes, correspondence, and administration of programs

Course and Curriculum Records	Includes college catalogs/bulletins, course schedules, syllabi and course outlines	Permanent	Academic Affairs
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Contract Records

General Type	Description	Retention Period	Comments
Grant Administration	Records related to the administration of federal and other grants, contracts, sponsored research projects, and agreements from negotiation to final performance such as grants-in-aid, state contracted services, and vendor contracts.	7 years after final payment or completion of all obligations under the grant or contract and all subsequent renewals, whichever is later.	Business Office

Computer Services

General Type	Description	Retention Period	Comments
Technology Inventory	This record may be used to inventory equipment, software, telephones, etc. It may contain the tag number, location, serial number, price, account source, etc.	ACT = until the annual report for the fiscal year in which the item was disposed is audited.	
Software License Agreements	These agreements define how many users are	Expiration	

	licensed to access each software application.	
Internet Access Policies/Agreement	These documents define the terms of use and access of the Internet, information technology resources, vpn access, etc. The documents are used to generate user accounts for staff, teachers and students.	ACT = retain current documents for current users.
Technology Service Requests	This record is used to document problems with equipment and to generate repair tickets. It may contain the user name, a description of the problem, the location of the equipment, the date/time the request was received and resolved, etc.	FY+3
Technology Network Maps/Documents	These records are used to map and define the technology infrastructure and the wiring of phone lines. They may include security information, identification numbers, passwords, etc.	Until they are superseded.
Communications	Some staff are issued 2-way radios, cell phones, pagers, etc. to facilitate communication. These files contain service contracts, employee contracts, FCC licenses, distribution lists, etc.	ACT = until the equipment is returned by the staff or disposed of.
Technology Training	The information technology staff may	ACT = until course materials are superseded

	conduct training about the use of computer software or equipment for school district employees. These files contain the curricula materials.	by a new version, or until the course is dropped entirely from the training curriculum.	
Security Videos	Security systems record activity that takes place in select locations. The systems may be motion activated. Videotapes are often re-used in accordance with a regular rotation cycle, unless they are needed as evidence for an incident. This series applies to both analog and digital video recordings.	Creation + 14 days	
Student Directories	These directories list all students attending the school. They may contain classification, student name, address, phone number, etc.	ACT = while of reference value to MC	Student may opt-out of being listed in the directory
Faculty and Staff Directories	These district-wide guides are published annually, and identify the teacher's name, school, classification, phone number, and address.	ACT = while of reference value to MC	

Facility Management Records

General Type	Description	Retention Period	Comments
Blueprints Manuals Warranties	As-Built Construction Plans	Life of building then 5yrs after final disposition of building	Facilities
Blueprints Manuals Warranties	Building Plans and Specifications	Life of building then 5yrs after final disposition of building	Facilities
Blueprints Manuals Warranties	Equipment and Operating Manuals	Until no longer useful	Facilities
Blueprints Manuals Warranties	Warranties	Life of the Warranty	Facilities
Compliance	EPA Audit and Compliance Records	Permanent	Facilities
Inspection Test	Annual Property Insurance Inspection	10 Years	Facilities
Inspection Test	Boiler Certificates	1 Year (shred when new cert is issued)	Facilities
Inspection Test	Elevator Inspection	1 Year (shred when new cert is issued)	Facilities
Inspection Test	Fire Alarm and Drill Records	3 Years	Facilities
Inspection Test	Fire Alarm Annual Inspection Report	Permanent	Facilities
Inspection Test	Fire Sprinkler System Annual Test Report	Permanent	Facilities
Plans and Procedures	Emergency Response Plans and Procedures	Until Superseded	Facilities
Reports Records Files	Asbestos Removal Records	Permanent	Facilities

Reports Records Files	Backflow Prevention Report	10 Years	Facilities
Reports Records Files	Bid and Competitive Selection Records	Until Completion of Project	Facilities
Reports Records Files	Estimates and Quotes	1 Year	Facilities
Reports Records Files	Capital Projects Construction Records	Permanent	Facilities
Reports Records Files	Contracts and Agreements	10 Years	Facilities
Reports Records Files	Equipment Maintenance Records	Life of the Equipment	Facilities
Reports Records Files	Hazardous Chemical Waste Records	Permanent	Facilities
Reports Records Files	Incident Report(Security)	Permanent	Facilities
Reports Records Files	Safety Data Sheets(SDS)	Permanent	Facilities
Reports Records Files	Motor Vehicle Certificate of Title	Until Vehicle is Sold	Facilities
Reports Records Files	Motor Vehicle Maintenance Records	Until Vehicle is Sold	Facilities
Reports Records Files	Packing Slips	1 Month	Facilities
Reports Records Files	Project Files(General Construction)	5 Years	Facilities
Reports Records Files	Property Damage Reports	Permanent	Facilities

Reports Records Files	Purchase Orders	1 Year	Facilities
Reports Records Files	Space Utilization Report	Until Superseded	Facilities
Reports Records Files	Vehicle Accident Report	3 Years After Final Disposition of Vehicle	Facilities
Reports Records Files	Work Orders (completed)	3 Years	Facilities