

# Records Management and Retention Policy

## Policy/Procedure

Dickinson College records are a valuable asset. The College is committed to the effective management and retention of its records as necessary to fulfill its educational mission, comply with legal requirements and preserve its history. The purpose of this policy is to assist the college community in its efforts to:

- Comply with legal, contractual and accreditation requirements for the retention, privacy and security of records
- Retain records for which there is continuing administrative and/or operational need and establish mechanisms for ensuring the authenticity, reliability and usability of such records
- Destroy records no longer necessary to the operation of the college in order to optimize the use of space, both physical and electronic, and minimize the cost of record storage
- Retain records that are valuable to the preservation of the college's history

### Definitions

#### Electronic Records

Any College owned record that is created, received, maintained and/or stored on college workstations, servers and system/service provider resource, both local and cloud based. As well as any record maintained in any non-paper format. Examples of electronic records include, but are not limited to, email, Faculty, administrative or student personal documentation, spreadsheets, databases, videos, photographs and audio recordings.

#### Official Repository

The College department, office, center or unit designated as having responsibility for retention and timely destruction of the college records subject to a required retention period.

#### Paper Record

Any College record maintained in a hard copy paper format.

#### Preservation Notice

If the College becomes involved in a legal action, a preservation notice may be issued by the Office of the General Counsel. A preservation notice compels the College to retain any and all records that may be relevant to a legal action that has been filed. Sometimes referred to as a “litigation hold”, a preservation notice suspends normal record retention periods and requires that records be maintained and not altered from that point forward until the notice is removed.

### **Required Retention Period**

The retention period set forth in the College’s records retention schedule, Appendix A.

### **College Record**

Electronic and paper records, collectively.

### **Official Repository and Retention Periods**

Appendix A to this Records Management and Retention Policy list the general types of college records, the official repository of such records within the College and the retention period for such records maintained by the official repository. Once the retention expires, the covered record maintained by the official repository should be properly destroyed.

Federal and state laws, regulations and best practices require that the College adhere to certain record retention requirements and periods of retention. The appropriate time periods for record retention are record specific and are subject to ongoing modification from time to time by government statute, judicial and administrative consent order, and private or government contract, pending litigation or audit requirements. Such modifications supersede the retention period for the applicable record stated in Appendix A. A temporary modification of a required retention period or suspension of record destruction required for any of these reasons will be accomplished by notification from the President’s Office, Office of the General Counsel the Provost Office and/or the Finance and Operations Division. No list of College Records is exhaustive. Questions regarding the retention period for any specific college record or category of records not included in Appendix A should be directed to the Office of the General Counsel.

### **Departmental Records Management**

Each College department should designate a records manager who is familiar with Records Management and Retention Policy, the Data Classification and Handling Policy and who assume responsibility for:

- Restricting access to sensitive records and information, as outlined in the Data Classification and Handling Policy, to those who need access to such records and information for the appropriate performance of their job responsibilities
- Information and educating staff within the department on the proper record management practices
- Coordinating the destruction of records as by provided by this policy

The Office of the General Counsel and the Director of Infrastructure Systems and Information Security are available to advise and assist individual departments to implement these requirements.

### **Safeguarding Records Containing Sensitive Information**

Many College records subject to record retention requirements contain sensitive information (non- public information including, but not limited to, name, address, social security number, bank account numbers, financial or financial aid information, student identification numbers, medical information, employment information, etc.). Such records are protected by federal and state statutes including the Family Educational Rights and Privacy Act (FERPA), the Gramm-Leach- Bliley Act (GLBA) the Health Insurance Portability and Accountability Act (HIPAA) and the EU General Data Protection Requirement (GDPR). Any record that contains sensitive information should also be treated in accordance with the College's Data Classification and Handling Policy.

The records manager of a department should ensure that active and inactive financial records (paper and electronic) are stored in a secure location. The storage location must provide appropriate confidentiality and protection from unauthorized inspection, theft, and physical damage due to a fire, water, natural disaster. The records manager should use sound judgment in restricting access to financial records.

### **Electronically Stored Information**

The ease with which electronically stored information may be created and the number of places where such information may be stored requires that the College manage its electronically stored information effectively, efficiently, and consistent with its legal obligations. System and service providers that maintain and process College records must conform to the same retention periods and data classification and handing of College records as outlined in the College's policies.

### **Disposal and Destruction of Records**

If it is determined that, consistent with this Records Management and Retention Policy, it is appropriate to dispose of any records, they can be destroyed in one of the following ways:

- Recycle paper records that do not contain sensitive information
- Shred paper records that may contain sensitive information
- Erase or destroy electronically stored information. The Director of Infrastructure Systems and Information Security can advise and recommend solutions to effectively dispose of these records.
- Physical destroy audio or video media.

College departments that are not official repositories of a college record but must have access to and that retain duplicate or multiple copies of such records should dispose of them when there is no longer an administrative or operational need for such records.

<b>APPENDIX A</b>		
<b>O = As Needed for Operations</b>		
<b>Type of Record</b>	<b>Official Repository</b>	<b>Duration</b>
<b>ADMISSIONS</b>		
Admissions decision letters	Admissions	For students who matriculate: 5 years after graduation or date of last attendance For students who do not matriculate: 3 years after application term
Appeals (Decision, Merit, Need)	Admissions	3 years after application cycle (May 1 of application year + 3 years)
Athletic Pre-Read forms and materials	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants
Application for admission or readmission: includes ED agreement form (if applicable) Common Application, and Dickinson Member Page	Admissions	For students who matriculate: 7 years after graduation or date of last attendance For students who do not matriculate: 3 years after application term
Correspondence with applicants	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants
Departmental notes on applicants	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants
Entrance examination reports/test/scores (ex. SAT, ACT, TOEFL)	Admissions	For students who matriculate: 7 years after graduation or date of last attendance For students who do not matriculate: 3 years after application term
Interview notes	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants or interviewees who choose not to apply within their admissions cycle
Letters of recommendation (Application)	Admissions	Upon enrollment date for enrolled applicants, August 30 for non-enrolled applicants
Recruitment materials	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants
Related Application Documents	Admissions	Upon matriculation date for enrolled applicants, August 30 for non-enrolled applicants
Transcripts—other colleges	Admissions	For students who matriculate: 5 years after graduation or date of last attendance For students who do not matriculate: 3 years after application term
Transcripts—high school	Admissions	For students who matriculate: 5 years after graduation or date of last attendance

		For students who do not matriculate: 3 years after application term
International Financial Documents	Admissions	For students who matriculate: 7 years after graduation or date of last attendance For students who do not matriculate: 3 years after application term
Correspondence with non-applicants	Admissions	1 year after application cycle
Inquiry and Prospect mailing lists	Admissions	2 months after use
Recruitment materials for non-applicants	Admissions	1 year after application cycle
<b>ATHLETICS</b>		
NCAA Eligibility and Compliance Records	Athletics	6 years from graduation or last day of attendance, whichever is later
Sports Medicine Records	Athletics	6 years from graduation or last day of attendance, whichever is later
Student Athlete Records	Athletics	6 years from graduation or last day of attendance, whichever is later
Summer Camp Records	Athletics	6 years from graduation or last day of attendance, whichever is later
<b>BOARD OF TRUSTEES</b>		
Board of Trustees meeting minutes	Secretary of the College	Permanent
Governance records (Bylaws, Charter, etc.)	Secretary of the College	Permanent
<b>COMPLIANCE AND ENTERPRISE RISK MANAGEMENT</b>		
Accident/Accident Reports	Compliance and Enterprise Risk Management	5 years
Air Monitoring and Area Sampling	Compliance and Enterprise Risk Management	5 years
Chemical inventories	Compliance and Enterprise Risk Management	5 years
Fire Incident Reports	Compliance and Enterprise Risk Management	5 years
Fire Protection System Reports	Compliance and Enterprise Risk Management	5 years
Hazardous Material Reports	Compliance and Enterprise Risk Management	5 years
Hazardous Waste Disposal Reports	Compliance and Enterprise Risk Management	5 years
Safety Incident Investigation Reports	Compliance and Enterprise Risk Management	5 years
Certificates of Insurance	Compliance and Enterprise Risk Management	5 years
Indemnifications Agreements	Compliance and Enterprise Risk Management	Permanent
Insurance Policies	Compliance and Enterprise Risk Management	Permanent
<b>DEVELOPMENT</b>		
Annual Fund Reports	Development	Permanent
Call Reports	Development	0
Capital Campaign Records	Development	Permanent

Cash Gift Records	Development	Permanent
Endowment Agreements	Development	Permanent
Planned Gift Agreements	Development	Permanent
Pledges	Development	Permanent
Wills/Bequests	Development	Permanent
<b>FACILITIES MANAGEMENT</b>		
Building/Site Plan Specifications	Facilities Management	Permanent
Building/Zoning Permits	Facilities Management	Permanent
Capital Construction Materials Info/Correspondence	Facilities Management	Permanent
Capital Construction Project Information	Facilities Management	Permanent
Maintenance Records	Facilities Management	10 years
Operating Permits (i.e. elevators)	Facilities Management	10 years
<b>FACULTY</b>		
Promotion Review	Provost Office	7 years after retirement or termination
Tenure Review	Provost Office	7 years after retirement or termination
Tenure/Tenure track faculty personnel files	Provost Office	7 years after retirement or termination
Adjunct Faculty and academic support personnel files	Provost Office	7 years after retirement or termination
Faculty Meeting minutes, agendas, etc.	Provost Office	0
Faculty Teaching Evaluations	Provost Office	7 years after retirement or termination
<b>FINANCE AND ADMINISTRATION</b>		
Subsidiary ledgers (accounts payable, accounts receivable, etc.)	Controller	7 years
Bank records, including deposits and withdrawal records	Controller	7 years
Annual financial reports	Controller	Permanent
Bond documents	Controller	Permanent
Endowment records	Controller	Permanent
Investment records and reconciliations	Controller	7 years
Procurement card applications, authorizations	Controller	3 years after account closure
Procurement card records	Controller	9 years
Travel reimbursement documentation	Controller	9 years
Depreciation records	Controller	life of asset
Information returns filed with federal, state and local authorities (W-2, 1099, 1042-S, etc.)	Controller	7 years
Audit reports	Controller	Permanent
Charitable solicitation registrations and annual returns	Controller	7 years
Fringe benefits (taxable) supporting documentation	Controller	9 years

Income tax returns (990, 990-T, state returns, etc.)	Controller	Permanent
Benefit plan audits (F/S, 990, 5500)	Controller	Permanent
Sales and use tax returns	Controller	7 years
Tax exemption documentation - IRS determination letter, state exemptions, etc.	Controller	9 years
Other tax filings - Affordable Care Act, FinCEN Form 114, Heavy Highway Vehicle Use, State Liquid Fuels	Controller	7 years
Accounts receivable statements	Student Accounts	7 years
Billing records	Student Accounts	7 years
Daily deposit reports	Student Accounts	7 years
Student loan records	Student Accounts	3 years after loan has been repaid in full (minimum 7 years)
Tax forms - tuition statements (1098-T)	Student Accounts	7 years
Tuition and fee charges	Student Accounts	7 years
Budget books	Planning and Budget	Permanent
Planning and budget minutes/documents	Planning and Budget	Permanent
Budget to actual projections	Planning and Budget	15 years
Budget work files	Planning and Budget	15 years
Payroll deduction authorization forms (W-4, etc.)	Payroll Office	Kept with employee personnel files until destruction
Record of payments and deductions (payroll register, deduction lists, adjustments, garnishments, allowances, etc.)	Payroll Office	9 years
Timesheets	Payroll Office	9 years
<b>GENERAL COUNSEL</b>		
Contracts	Office of the General Counsel	Length of contract + 7 years
Litigation files/claims		10 years from termination of litigation
Opinion letters		10 years
Policy documents		Permanent
Employee/Student settlement & benefits documents		7 years after the benefits period outlined in the agreement has ceased or 50 years total
Waivers and other release of liability forms		4 years after signed or, in the case of a minor, 4 years after 18 <sup>th</sup> birthday
<b>HR SERVICES</b>		
Employee personnel files (including applications, resume, payroll, appointment/salary forms, performance appraisals, etc.)	HR Services	7 years after end of employment
Job announcements, Search committee records, including employment applications, resumes, and all applicant materials	HR Services	2 years
I-9	HR Services	3 years after date of hire or one year after date of termination, whichever is later
Occupational injury or illness records, workers compensation claims	HR Services	5 years following the year the record pertains to or 30 years after end of



		employment if exposed to toxic substance
Workers compensation claims and insurance policies	HR Services	7 years after end of employment, signing a settlement agreement or death, whichever is later
Health, life and disability insurance plan documentation	HR Services	Permanent
Retirement plan documentation	HR Services	Permanent
Family Medical Leave Reports	HR Services	3 years after leave has ended
<b>LIBRARY AND INFORMATION SERVICES</b>		
Network access and account	Infrastructure Systems	Disabled 1st day of the following month of end of employment. Deleted at the close of the fiscal year
Email	Infrastructure Systems	4 Years
Backup Tapes	Infrastructure Systems	10 years
<b>Public Safety</b>		
Annual crime reports and related documentation	DPS	7 years
Accreditation records	DPS	Permanent
Surveillance video	DPS	Until overwritten. Generally, 3 -4 weeks
Dispatch operator - audio recordings	DPS	Until overwritten. Generally, 3 -4 weeks
Citations	DPS	7 years
Investigation records	DPS	7 years
<b>STUDENT ACADEMIC AND ADMISSIONS RECORDS</b>		
Academic actions	Registrar's Office	Permanent
Academic action (leaves of absence, withdrawal, etc.)	Registrar's Office	3 years from last date of attendance
Grade changes (change to final grades)	Registrar's Office	Permanent
Grade rosters (record of grade submitted)	Registrar's Office	3 years from date of last attendance
Grades (final grades)	Registrar's Office	Permanent
Grade books	Registrar's Office	Permanent
Graded course material (homework, exams, etc.)	Faculty	Minimally, 2 years from date of last attendance
Holds (registration, diploma, transcript, etc.)	Registrar's Office	1 year after date of last attendance
Leave of absence/withdrawal authorization	Registrar's Office	Permanent
Name change authorization	Registrar's Office	Permanent
Transcript	Registrar's Office	Permanent
Transcript credit evaluations	Registrar's Office	5 years after date of last attendance
Degree recipients	Registrar's Office	Permanent
Degree requirement exceptions/change petition	Registrar's Office	Permanent
Class Roster	Registrar's Office	3 years after date of last attendance
Course offerings and schedule of classes	Registrar's Office	10 years
Class enrollment change form	Registrar's Office	1 year after date of last attendance
Class enrollment changes	Registrar's Office	1 year after date of last attendance
Student Disciplinary/Conduct records	Registrar's Office/Student Life	7 years after date of last attendance

Student Disciplinary/Conduct records and investigation or hearing recordings	Title IX Office	7 years after date of last attendance
Advanced placement records, materials related to applications for admission or readmission, relevant correspondence, entrance exam reports and similar documents provided to the Office	Registrar's Office	5 years after date of last attendance
Health Care/Medical records	Wellness Center	7 years
International student forms (visa documentation, financial certification, etc.)	Center for Global Studies & Engagement	5 years after date of last attendance
<b>STUDENT TUITION, BILLING AND FINANCIAL AID RECORDS</b>		
Financial Aid Applications	Financial Aid	5 years
Cashier reports	Cashier's Office	6 years
Disclosure statements	Bursar's Office	3 years after account has been paid in full
Residency change documents (non-resident to resident)	Bursar's Office	5 years from graduation or date of last attendance
Student loan records	Bursar's Office	3 years after the loan has been paid in full
Tuition and fee charges	Bursar's Office	6 years
<b>SPONSORED PROJECTS</b>		
Grants administration records including awards, contracts and cooperative agreements, progress reports, invention and property reports	Sponsored Projects Group	Up to 7* years after completion of project/ research**
Financial records including Financial Status Reports (FSRs), periodic financial reports	Sponsored Projects Group	Up to 7 years after completion of project/ research
Scientific records	Sponsored Projects Group Principal Investigator	Up to 7 years after completion of project/ research**
Grant Proposals and Pre-Award Documents	Sponsored Projects Group	Permanent

## Records Specific to Sponsored Projects

\*This retention period is a maximum retention period. Lesser retention periods are dictated by applicable agency(s) requirements.

\*\*“Completion of Research” refers to the period after the final close out of the grant and after all final documents have been submitted. These submitted documents include Financial Status Reports, Progress Reports, Invention Reports and Property Reports.

- **Federal Sponsors:**  
Grants: In general - records must be retained for a period of three years from the date of submission of the final Financial Status Report to the sponsor, see 2 CFR 200-333.  
Contracts: In general, records must be retained for a period of three years from the date of payment of the final invoice by the sponsor.
- **Non-Federal Sponsors:**  
Records should be retained following the same guidelines required by Federal sponsors, unless the terms of the agreement specify otherwise.

If a department is uncertain as to whether or not the record retention requirements have been satisfied, the records should not be destroyed without the advice and consent of Sponsored Projects Group.

<b>Related Information</b>
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<b>History/Revision Information</b>
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**Also Found In:**