

Policy Name	Information Retention Policy
Policy Category	Information Security
Policy Sub-Category	Data
Responsible Department	Administrative & Financial Services /Digital Strategies and Infrastructure
Policy to be Approved By	Cabinet
Responsible VP	VP of Administrative & Financial Services/VP for Digital Strategies and Infrastructure
Responsible AVP or Director	Director of Business Process and Applications/Administrative Assistant to VP of Administrative & Financial Services
Original Policy Date: N/A	Last Known Revision Date: N/A
Date of Policy Review: 12/19/2017	Policy Applies To: Entire Campus
Policy Effective Date : 1/1/2018	Recommended Policy Review Date: 6/1/2021
Additional Authority/References : N/A	

## Contents

Purpose .....	2
Applicability .....	2
Definitions and Policy Development Process.....	2
POLICY .....	2
Storage of Archived, Paper Records .....	2
Destruction and Disposal Process.....	2
Enforcement .....	3
Information Retention/Destruction/Archival Schedule: .....	3
<b>Financial Data (Controller’s Office)</b> .....	3
<b>Payroll Data</b> .....	4
<b>Type of Records</b> .....	4
<b>Recommended Retention</b> .....	4
<b>Human Resource Data</b> .....	4
<b>Type of Records</b> .....	4
<b>Recommended Retention</b> .....	4
<b>Student, Academic Data</b> .....	5
<b>Type of Records</b> .....	5
<b>Recommended Retention</b> .....	5
Enforcement .....	11
Policy Purpose .....	11

## Purpose

The College is committed to effective record retention to preserve its history, meet legal standards, optimize the use of space and computer storage, optimize the cost of record retention, and ensure that outdated and useless records are destroyed.

## Applicability

This policy applies to all faculty, staff members, student employees or volunteers, as well as all any third party service provider supplying services to the College, who create, use or otherwise access or interact with any College records.

## Definitions and Policy Development Process

**‘Information’** for the purpose of this document, is any tangible (paper, electronic, photographic, etc.) or intangible (digital records in applications, cloud storage, shared drives etc.) records reflecting College educational and business transactions regardless of format (paper, electronic, photographic, etc.). This includes student, administrative, financial, and legal as well as other types of information collected, stored and used by the College. Unless otherwise specifically set forth in this Policy, long-term maintenance and disposition of electronic and digital records shall proceed on the same schedule as paper records.

Albright College has established that records can contain three different classes of data: Public, Restricted, and Highly Sensitive. The [Administrative Data Management and Access Policy](#) details these classifications, data stewardship, guidelines and the College’s data classification standard along with a complete list of Data Stewards.

This policy is based on information retention policies at University of Maryland, University of Iowa, University of Massachusetts, and Cornell University. Albright has also researched EDUCAUSE resources to determine best practices where they exist.

## POLICY

### Storage of Archived, Paper Records

All active and permanent paper records should be archived in the respective areas of operation. All existing security protocols with regards to storing and safeguarding official Albright records should be strictly adhered to. Specifically, archived, paper records should be stored in an appropriate file storage box (e.g. Bankers Box or paper box; click [here](#) for other examples) within a locked room or within a locked filing cabinet for the timeframes specified in this policy. The storage box or cabinet drawer should be clearly labeled with a short description of the records and the timeframe covered by the records, e.g. “Accounts payable records 2017-18.” Paper records should not be retained in plastic bags. A log of all stored records should be provided to the Data Trustee on an annual basis including any additions or removals via proper destruction.

### Destruction and Disposal Process

When the required retention period expires, the responsible office will initiate the process for the record’s destruction and disposal. The destruction of records shall be authorized by the Data Trustee in the responsible office. All electronic records shall be destroyed in consultation with Information Technology Services and in accordance with the [established data removal procedure](#). All paper records constituting

Restricted or Highly Sensitive data records shall be destroyed by high quality shredding in consultation with the Data Trustee and Facilities Services & Operations.

### Litigation Hold on Records

Information pertaining to any investigation, legal action or proceeding, litigation, audit, or program review in progress should not be destroyed even if the retention period or disposition date specified for the records has expired. In the event that litigation or an administrative agency claim is reasonably likely to occur, Albright College 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 appropriate Data Trustee and Data Steward immediately to ensure all relevant records can be preserved. Please also contact the Vice President for Administrative and Financial Services so that legal counsel can be consulted. Records that are subject to a litigation hold shall not be destroyed in accordance with the procedures discussed in this policy. 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.

### Enforcement

Where identified, [Data Stewards](#) from each area, in consultation with the [Data Trustee](#) are responsible for ensuring the compliance of this policy. When Data Stewards are not identified by the Data Access Policy referenced above, the appropriate office is identified by the Information Retention Policy.

Albright College employees are responsible for understanding and complying with all College policies and procedures, including but not limited to the [Administrative Data Management and Access Policy](#). These policies include requirements for protecting and preserving the quality, integrity and confidentiality of administrative data records, as well as logical access controls to administrative data and other Albright technology resources. Data Classification standards, as documented in the Administrative Data Management and Access Policy, must be strictly adhered to.

### Information Retention/Destruction/Archival Schedule:

#### Financial Data (Controller's Office)

Type of Records	Recommended Retention
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records	7 years
Budget Information, including Projections	7 years
Accounts Receivable including Invoices	7 years
Accounts Payable including Invoices	7 years
Student Accounts Billing Records and Correspondence	7 years
Bank Statements, Bank Reconciliations, and Deposit and Check Information	7 years
General Ledgers including Journal Entries and Supporting Documentation	7 years

Endowment Agreements and Related Donor Documentation	Permanent
Investment Transaction Records	7 years
Business Correspondence	Retain 3 years, then review for need

### Payroll Data

Type of Records	Recommended Retention
W-2, W-4 and 1099 forms	7 years after termination
Time Sheets	7 years
Employee Deduction Authorizations	7 years after termination
Payroll Deductions	7 years after termination
Labor Distribution Cost Records	7 years
Payroll Registers	7 years

### Human Resource Data

Type of Records	Recommended Retention
Personnel	At least 3 years and up to 7 years following termination of employment or until final disposition of a charge or action (if applicable)
Applications, Resumes, Selection, and Hiring	At least 1 year after creation/receipt of the document or the employment decision
Termination	7 years
Time Cards	3 years
Collective Bargaining Agreements	7 Years
Form I-9	3 years after date of hire or 1 year after date of termination, whichever is later
Employee Background Checks	6 years from the date of the background check
Unemployment Insurance (PA)	4 years
Wage and Hour Records	Recommended retention period is duration of employment plus 5 years

Employee Handbooks	Permanent
Employee Benefit Plans	Permanent
ERISA Plan Documents	6 years
FMLA Records	3 years
COBRA	Recommended 6 years from date of the record
Tax	At least 4 years from the date tax is due or paid
OSHA 300 Log (Log, annual summary, OSHA Incident Report forms)	5 years following end of corresponding calendar year

### Student, Academic Data

Type of Records	Recommended Retention
Academic Actions (dismissal, etc.)	5 years from graduation or date of last attendance
Academic integrity code violation: (and related case files)	Permanent
Academic records (including narrative Evaluations, competency assessment, etc.)	Permanent
Change of Course documentation (Cont. Ed., Summer, Extramural Studies)	5 years from date of enrollment
Change of Grade documentation	Permanent
Change to Student ID Number	Permanent
Class Lists (original)	Permanent Consent to Release Personally Identifiable
Information (or non-disclosure requests)	Kept until next academic year
Course Offerings	Permanent
Curriculum Change Authorizations	5 years from graduation or date of last attendance
Disciplinary Records (findings of violation and related case files)	Permanent where penalty imposed is probation, suspension, or expulsion
Enrollment Verifications	1 year from enrollment date

Grade Sheets	Permanent
Graduation Lists	Permanent
Hold or encumbrance authorization	Until released
Name Changes	Permanent
Original Grade Sheets	Permanent
Student Class Schedules	1 Year from graduation or date of last attendance
Student Registration forms	1 year from registration
Term Reports	5-7 years depending on School
Transcripts	Permanent
Transcript Requests	1 year from submission date
Transfer Credit Evaluations	5 years from graduation
Veteran Administration Certifications	5 years from graduation or date of last attendance
Withdrawal Authorizations/Leaves of Absence	2 years
Admissions documents for Applicants who do not enroll	2 years from date of start of application term
Advanced Placement Records	5 years from date of graduation or date of last attendance
Letters of Recommendation	Until date of admission
Recruitment Materials	Until date of enrollment
Residency Certificates	Until date of enrollment
Residency Change Documents (non- Resident to Resident)	5 years from graduation or date of last attendance
Student Waivers for Right of Access	Until graduation or date of last attendance
Transcripts (high school and other college)	5 years from graduation or date of attendance
International Student Forms (visa documentation, eta.)	5 years
Degree, grade, enrollment, racial/ethnic stats	Permanent

Schedule of Classes (institutional)	Permanent
State Reports	Permanent
Catalogs	Permanent
Commencement Programs	Permanent
Student Counseling Records	7 Years
Health Center Records	7 Years

#### **Student Financial Aid Data**

<b>Type of Records</b>	<b>Recommended Retention</b>
Financial Aid Records (for applicants who Do not enroll)	3 years from application date
Financial Aid Records (applicants who Enroll)	5 years from graduation date

#### **Academic Personnel (Office of the Provost)**

<b>Type of Records</b>	<b>Recommended Retention</b>
Academic Search Records	Same as HR
Annual Conflict of Interest Disclosure Statements	3 years
Grievances	No cause findings: 3 years from determination; cause findings: Permanent
Personnel files, appointment letters, forms	Same as HR
Tenure or promotion dossiers	If approved, 3 years. If tenure denied, 3 years from end of term appointment
Trustee decisions regarding academic matters	Permanent

#### **Advancement /Alumni Data**

<b>Type of Records</b>	<b>Recommended Retention</b>
Alumni Records	Permanent
Gift and Endowment Records	Permanent for electronic records
Gifts of Art	Permanent
Original Gift Letter Agreements (signed By President and donor)	Permanent

Original gift letter (all others)	Permanent
Planned gifts (trusts, life income, Agreements, annuities) real estate gifts	Permanent

**Contracts/ Leases**

Type of Records	Recommended Retention
Contracts, leases, and related documents	7 years

**Grant Data (Academic Affairs, Advancement and Controller's Office)**

Type of Records	Recommended Retention
Original Grant Proposal	Permanent
Grant Agreement and Subsequent Modifications	7 years after close of grant
All Formal Correspondence including Requested IRS- Grantee Correspondence	7 years after close of grant
Final Grant Reports, both Financial and Narrative	7 years after close of grant
All Matching Support Documentation	7 years after close of grant

**Facilities and Property Records**

Type of Records	Recommended Retention
Construction	
As-built drawings	Life of building plus 10 years
Contracts and agreements	7 years after expiration
Environmental Health & Safety	
Employee chemical or biological exposure records	Duration of employment plus 30 years
Employee medical records other than health insurance claim records and first aid records	Duration of employment plus 30 years
Material Safety Data Sheets and/or Chemical Inventory List	30 years
Employee respirator medical evaluations	Duration of employment plus 30 years
OSHA safety training records	3 years from date of training
Evacuation drill records	5 years
Fire protection systems records	5 years



Fume hood testing records	3 years
Hazardous waste disposal manifests/reports	3 years
Portable extinguisher training records	3 years
Radiation dose reports	Permanent
Radiation safety training records	3 years
Radioactive materials license & Safety Committee reports	Permanent
Radioactive material receiving/inventory records	3 years
Real Property	
Documents for leases, licenses, construction Contracts, other temporary contracts <\$50K	6 years after expiration of leases or contract term
Property deeds, easements, licenses, rights of Way, leases, rights of first refusal, Remainder Interests, mortgages	Permanent
Title Insurance Policies	10 years after disposal of property

### **Corporate Records**

Accreditation Records	Permanent
Articles of Incorporation	Permanent
Minutes of the Board and Governing Committees	Permanent
Bylaws	Permanent
Tax Exempt Status/ IRS Determination Letter	Permanent
Annual Corporate Filings	Permanent
Certificate of Incorporation/ Corporate Records to the State	Permanent

### **Legal Records**

Consent orders	Permanent
Court orders	Permanent
Judgments	Permanent
Releases	Permanent
Settlements	Permanent

**Patent and Trademarks**

Original executed invention disclosure forms	Permanent
Original executed United State Patent and Trademark Office assignment forms	Permanent
Original Letters, Patents	Permanent
U.S. patent/application correspondence papers	Permanent
U.S. patent/application filing papers	1 year after issuance of abandonment
Foreign patent/application-related work papers	Permanent
Original registered Trademarks	Permanent
Trademark-related work papers	Permanent
Original executed licensing agreements	Permanent
Licensing agreement-related work papers	7 years from expiration or termination of agreement
Royalty Records	Life of technology/patent or trademark plus 7 years

**Insurance Policies, Claim Information, and other Risk Management Data**

All Insurance Policies (liability, property, et al.)	Permanent
Certification of insurance, Indemnification Agreements, Hold-harmless agreements, Contracts	7 years after expiration of agreement
Incident reports – injury / assault	Permanent
Incident reports – all other reports	7 years after report date, unless claim develops
Claim Information	Permanent

**Public Safety Data**

Type of Records	Recommended Retention
Accident Reports	7 years
Crime Reports	7 years
Property Damage Reports	7 years
Releases and Waivers	7 years

Driver Credentialing	Employees = 7 years; students = 7 years from date of graduation or withdrawal date
----------------------	--

When the required retention period expires, the responsible office will initiate the process for the record's destruction and disposal. The destruction of records shall be authorized by the Data Trustee in the responsible Office. All electronic records shall be destroyed in consultation with Information Technology Services. All paper records constituting Restricted or Highly Sensitive data records shall be destroyed by high quality shredding.

Information pertaining to any investigation, legal action or proceeding, litigation, audit, or program review in progress should not be destroyed even if the retention period or disposition date specified for the records has expired.

All active and permanent paper records should be archived in the respective areas of operation. All existing security protocols with regards to storing and safeguarding official Albright records should be strictly adhered to.

### Enforcement

Where identified, [Data Stewards](#) from each area, in consultation with the [Data Trustee](#) are responsible for ensuring the compliance of this policy. When Data Stewards are not identified by the Data Access Policy referenced above, the appropriate office is identified by the Information Retention Policy.

Albright College employees are responsible for understanding and complying with all College policies and procedures, including but not limited to the [Administrative Data Management and Access Policy](#). These policies include requirements for protecting and preserving the quality, integrity and confidentiality of administrative data records, as well as logical access controls to administrative data and other Albright technology resources. Data Classification standards, as documented in the Administrative Data Management and Access Policy, must be strictly adhered to.

<p><b>Policy Purpose</b></p> <p>Albright College is committed to effective information retention to preserve its history, meet legal standards, optimize the use of space and computer storage, optimize the cost of information retention, and ensure that outdated and useless records are destroyed.</p>
<p><b>Decision</b></p> <p>X Approved <u>Cabinet December, 2017</u></p> <p><input type="checkbox"/> Rejected _____</p> <p><input type="checkbox"/> Tabled or Further Review Needed _____</p> <p>Comments:</p>