



College Records Retention Management & Schedule

Retention, Disposal, and Archive of Student Records

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The college recognizes the importance of maintaining records for historical and research purposes and attempts to keep records for a time frame that balances the availability of usable records with existing storage capacity. It is the intent of the College to maintain records for at least the minimum length of time dictated by federal regulations and within the following schedule.

A student record is defined in the context of federal regulations:

"Records that are directly related to a student and maintained by an educational agency or institution or by a party for an agency or institution, if certain conditions are met" (Rooker and Falner 2017, 7).

The college must also emphasize the importance of protecting student information:

"Protecting student privacy is paramount to the effective implementation of FERPA. All education data holders must act responsibly and be held accountable for safeguarding students' personally identifiable information (PII) from education records" (Education, Federal Register Online via the Government Printing Office, 2011).

"The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education" (U.S. Department of Education. Family Educational Rights and Privacy Act (FERPA).

PURPOSE

There are three guiding purposes for this records retention policy:

- **Accountability.** This policy is written to assure compliance with state and federal law. As a private institution, the college has an obligation of accountability. By preserving college records, the institution documents its policies, actions, and determinations.
- **History.** Key records of the institution document its history and its character.
- **Efficiency.** An appropriate records retention policy assures maintenance of records needed for ongoing operations. Conversely, records that are no longer useful should be discarded or archived to increase efficiency.

This policy addresses the identification of records and the duration for retaining institutional records.

POLICY STATEMENT

All faculty and staff have responsibility for identifying and retaining college records—paper and electronic—in accordance with the College Records Retention Management and Schedule. Records are to be archived or destroyed after the retention period, subject to the exceptions stated in this policy regarding retention for audit and litigation purposes.

RECORDS RETENTION SCHEDULE

All faculty and staff have responsibility for complying with the provisions of the College Records Retention Management and Schedule which addresses the management and preservation of specific college record types. The Schedule indicates the required--

- Duration for which each record type must be retained
- Responsibility assignments for the management of active records, the storage of inactive records, and the archival of permanent records
- Confidentiality of each record type
- Disposal method (if applicable)
- Contact information for submitting additions, updates, and corrections to the Retention Schedule

Permanent retention: The department chair or director (or designee) must be consulted regarding permanent storage decisions. Permanently retained records are to be stored in a media form and location that will adequately endure the passage of time.

MANAGING STORED RECORDS

Physical Records

Storage of physical records

Paper records (i.e., non-electronic records) must be stored in such a way that they are both sufficiently accessible and safeguarded against environmental damage. For example, an active contract may be stored on ordinary paper in a file cabinet in an office. However, for permanent storage, that contract may require specialized environmental controls over temperature and humidity. Vital records needed for disaster recovery may need to be stored in a disaster-resistant safe or vault to protect against fire, flood, earthquakes, tornado, etc.

Circulating physical records

Circulation refers to the cycle of retrieving a physical record, tracking it while checked out from storage, and then returning the record is referred to as circulation. At its simplest, circulation is handled by manual methods such as simply writing down who has a particular record, and when they should return it. However, a computerized records management system may provide better efficiency and accuracy in the tracking of circulating records.

Electronic Records

Unlike physical records, management of electronic (i.e., digital) records requires a computer, server, or other digital storage equipment. Particular concerns exist about digital preservation—the ability to retain and still be able to access and read electronic records over time as technologies change. With electronic records, technical expertise is needed to assure that the content, context and structure of records is preserved and protected.

Contact the Information Technology Director for guidance and services regarding the storage of electronic records.

Email

Email is simply a method to communicate information in electronic form. Whether a particular email satisfies the test of being a “college record” depends on the content of the email. Email that does not relate to college business is not subject to retention. Much of the business-related email is of limited or transitory value, and, as provided by the College Records Retention Management & Schedule Policy, may be deleted when it no longer has value to you. If college email is used to document final college action, and no other electronic or paper document is preserved, then it should be preserved if it has lasting business or historical value.

Regardless of whether it is stored on campus servers or at an off-campus email service provider, a college record must be retained as required by the College Records Retention Management and Schedule Policy.

Employee Responsibility for Archiving

Employees should arrange for retention of email containing college records having lasting business or historical value. Some email systems will do this for the employee; others may require the employee to take action. If the email system in use does not retain such records, office protocols should be arranged to retain them.

Email Summary

1. Determine whether an email is of lasting business or historical value.
2. Email that is not of lasting business or historical value may be deleted at any time.
3. Email that must be retained needs to be stored in a searchable format on persistent storage for the time specified in the College Records Retention Management & Schedule.

Exceptions

Caution: Audit, Litigation, or Public Records Request

A college record may not be destroyed by the holder of the record if the holder is aware of any audit, litigation, public records request, claim, negotiation, open administrative review, or other action involving the record. Records must be maintained until all required audits and requests are completed and should be retained beyond the listed retention periods when there is a probability of litigation either involving records or requiring their use. If any office or department have issued a litigation or legal hold, records relevant to the issue must be preserved until the hold has been released.

Redundancy

Excess copies of records should be destroyed when they cease to be useful and should never be kept longer than the college record. Stocks of obsolete forms or pamphlets are not considered to be university records and are not subject to this policy or the College Records Retention Management and Schedule.

Disposal of Records

College records that are not archived permanently will at some point be subject to disposal.

Expired Records

The department chair or director (or designee) is responsible for conducting an annual review to identify records with expired retention periods. The disposition of expired records must be handled in a systematic manner. If an expired college record is to be destroyed, the department chair or director must preauthorize the destruction.

Secure Destruction

The department chair or director is responsible for assuring the secure destruction of sensitive or confidential records that will no longer be retained. Secure destruction is required for records containing confidential information. Paper records must be shredded or destroyed in a manner to make them unreadable. Digital media must be scrubbed or destroyed using current industry standards.

Retention Schedule | Admissions for Traditional & Non-Traditional Campuses

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|--|---|------------------------------|---------|---------------------------|-------------------|
| Admission Documents | | | | | |
| Admissions letters | Notice of admission, denial, or waitlist | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| Scholarship letters | Notice of scholarship | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| Correspondence, relevant | | 3 years AG or UANS | 1, 2 | Email, Paper, Imaged | Radix, File |
| Admission Materials | | | | | |
| Application for admission or re-admission | Admission application such as undergraduate, international or non-degree admittance | 1 year AFT | 1, 2 | Paper, Imaged | Radix, File |
| Credit by examination | Reports/scores on Advanced Placement, CLEP, DSST, etc. | 3 years AG | 1, 2 | Paper, Imaged | SIS, Radix, File |
| Entrance examination reports/test scores | Standardized test scores, such as ACT or SAT | 3 years AG | 1, 2 | Paper, Imaged | SIS, Radix, File |
| Medical Records | i.e., immunization records | 3 years AG | 1, 2, 3 | Paper, Imaged | SIS, Radix, File |
| Letters of recommendation (admissions) | | UA | 1, 2 | Paper, Imaged | Radix, File |
| Military Documents | | 3 years AG | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Placement test scores/reports | | 3 years AG | 1, 2 | Paper, Imaged | SIS, Radix, File |
| Transcripts (high school) | | 3 years AG | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Transcripts (other colleges or universities) | | 3 years AG | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| International Student Documents | | | | | |
| Alien Registration Receipt Card | Evidence of admissibility as a permanent resident | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| DS-2019 | Certificate of eligibility for J1 visa status | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |

Retention Schedule | Admissions for Traditional & Non-Traditional Campuses (continued)

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|--|--|------------------------------|-------|---------------|-------------------|
| Employment Authorization (work permit), if granted | | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| I-20 | Certificate of eligibility for F-1 visa status | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| I94 Card (copy) | Document issued to nonimmigrants; also known as Arrival Departure Card | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| Passport number | | 3 years AG | 1, 2 | Paper, Imaged | SIS, Radix, File |
| Statement of Educational Costs | Estimate of total college year costs | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |
| Statement of Financial Responsibility | Evidence of adequate financial resources | 3 years AG | 1, 2 | Paper, Imaged | Radix, File |

AFT: After first term of enrollment; **AG:** After graduation term or last term of attendance; **UA:** Until admitted; **UNAS:** Until administrative need is satisfied

¹ Must retain student records of admission and placement for three years after graduation or withdrawal because the college participates in offering low interest loans to students. In the event of an open audit, records must be retained until all questions are resolved.

² Admissions & Registrar's Offices are the Primary Responsibility Users

³ Admissions, Registrar & Student Life Offices are the Primary Responsibility Users

Retention Schedule | Student Academic Records

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|--|--|------------------------------|------------|---------------------------|-------------------|
| Academic Program Records | | | | | |
| Academic Advising records | Advising files, Change of Advisor forms, etc. | 3 years AG or UANS | 1, 2, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Academic Probation | Notice of academic action related to academic non-performance or deficiency | 3 years AG | 1, 2, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Academic Suspension | Notice of academic action related to academic non-performance or deficiency | 3 years AG | 1, 2, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Academic Dismissal | Notice of academic action related to academic non-performance or deficiency | 3 years AG | 1, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Academic integrity code violations (with sanctions) | i.e., Academic Integrity Report form; notice of violation of academic integrity policies including sanctions, if any | P | 1, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Correspondence (student) | Related to academic records, inquires | 3 years AG | 1, 3, 5 | Electronic, Paper, Imaged | Radix, File |
| Disciplinary Action Records | Grade or program action, notice of sanctions related to personal conduct | 3 years AG | 1, 2, 7 | Paper, Imaged | SIS, Radix, File |
| Grievance/complaint (by student) | Various course/exam related issues, not grade or FERPA disputes | UANS | 1, 3, 5 | Electronic, Paper, Imaged | Radix, File |
| Leave of absence | i.e., Incomplete form | UANS | 1, 3, 4 | Paper, Imaged | SIS, Radix, |
| Emphasis/track (major/minor) changes, certifications, etc. | i.e., Degree Intent form | UANS | 1, 2, 3, 5 | Paper, Imaged | SIS, Radix, |
| Petitions (academic) | Exceptions to academic rules | UANS | 1, 3, 5 | Paper, Imaged | Radix, File |
| Transcripts | Permanent academic record | P | 1, 2, 3, 5 | Electronic, Paper, Imaged | SIS, Radix, File |

Retention Schedule | Student Academic Records (continued)

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|---|---|------------------------------|---------|---------------------------|--------------------------|
| Certification/Verification Records | | | | | |
| Athletic eligibility reports | | UANS or AAR | 1, 3, 6 | Paper, Imaged | SIS, Radix |
| Athletic records | Initial and continuing eligibility information, academic information, documentation of participation, tutor evaluation and assessment | UANS or AAR | 1, 3, 6 | Electronic, Paper, Imaged | SIS, Radix |
| Enrollment verifications | i.e., Prerequisite form; verifications of enrollment, graduation, GPA, and other related academics | UANS | 1, 3, 5 | Paper, Imaged | SIS, Radix |
| Transcript requests (student) | Official transcript requests by student | UANS | 1, 3, 5 | Paper, Imaged | SIS, Radix |
| VA certification records | Certifying documents for federal VA benefits | 3 years AG | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix, File |
| Degree and Certificate Records | | | | | |
| Application for degree or other credential | i.e., Degree Intent form | 3 years AG or UANS | 1, 3, 5 | Paper, Imaged | SIS, Radix, File |
| Degree audit records | i.e., Jr/Sr Degree Audit Request form, Graduation Petition | 3 years AG or UANS | 1, 3, 5 | Electronic, Paper, Imaged | Radix, Google Form, File |
| Graduation lists | Lists of graduates or graduating class | P | 1, 3, 5 | Electronic, Paper, Imaged | Radix, File |
| Substitution/waivers | i.e., Degree Exceptions/Agreements form | UANS | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Grade and Scholarship/Deficiency Records | | | | | |
| Exams (final)/graded coursework | | 1 year CC ^A | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Moodle, Radix |
| Grade appeal/complaint | Student final grade dispute | 1 year | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix, File |
| Grade book (faculty) | Record of students in course and work completed | 5 years CC | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Moodle, Radix, File |

Retention Schedule | Student Academic Records (continued)

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|---|--|------------------------------|------------|---------------------------|------------------------|
| Grade change forms | i.e., Change of Grade form | UANS | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Grade reports | i.e., 5-week and 9-week reports | ET | 1, 3, 5 | Electronic, Paper, Imaged | Google Team Drive |
| Grade submission sheets/data | Original record of grades submitted at end of term | P | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix, File |
| Miscellaneous Records | | | | | |
| Name change authorization | i.e., College Records Information Change form | UANS | 1, 2, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Personal data information forms | Change of address, race/ethnicity questionnaires, and other demographic data | UANS | 1, 2, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Transfer credit evaluations | | 3 years AG | 1, 2, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Registration and Enrollment Records | | | | | |
| Class schedules (students) | Student schedule for each term | UANS | 1, 2, 3, 5 | Electronic, Paper | Google Team Drive, SIS |
| Class lists | Record of class rosters for each term | UANS | 1, 3, 5 | Electronic, Paper | Moodle, SIS |
| Credit/no credit, audit approvals | Authorization for various enrollment options | UANS | 1, 3, 5 | Electronic, Paper | SIS, Radix |
| Enrollment changes | i.e., Drop/Add forms; record of withdrawal | UANS | 1, 3, 5 | Electronic, Paper | SIS, Radix |
| Hold or encumbrance authorizations | Registration or transcript holds | UANS | 1, 3, 5 | Electronic, Paper | SIS, Radix |
| Registration/enrollment records | i.e., Drop/Add forms; initial enrollment forms, current enrollment forms | UANS | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |
| Withdrawal/cancellation of enrollment records | Record of request to withdraw from all classes | UANS | 1, 3, 5 | Electronic, Paper, Imaged | SIS, Radix |

AAR: Pursuant to athletic association rules; AFT: After first term of enrollment; AG: After graduation term or last term of attendance; CC: After course completion; ET: End of term; P: Permanent; UNAS: Until administrative need is satisfied

^A If work is not returned to student

¹ Must retain for three years after graduation or withdrawal students' records of academic progress, attendance, and courses studied according to the General Educational Provisions Act as amended by improving America's School Act of 1994 (Public Law 103382) because the college participates in offering low interest loans to students. In the event of an open audit, records must be retained until all questions are resolved. In addition to keeping records of all financial aid the student receives, the college will need a financial aid transcript for a transfer student.

² The recommended retention period based on graduation or non-attendance should begin with the date of graduation or the date, term or semester and year of last attendance.

³ FERPA specifically requires institutions to maintain records of requests and disclosures of personally identifiable information except for defined "directory information" and request from a student for their own records. The records of disclosures and requests for disclosures are considered part of the students' educational records; therefore, they must be retained as long as the education records to which they refer are retained by the college.

⁴ The VA regulations state that the following records must be retained for at least three years after termination of enrollment:

- Grade reports and/or statements of progress (academic records)
- Change of course forms
- Transfer credit evaluation
- Degree audit records

VA regulations requires that all advertising, sales, and enrollment materials (e.g. catalogs) used by or on behalf of the college during the previous 12 months must be retained and available for review. In addition, records of tuition and fees charged to and collected from students, grade reports and statements of progress (academic records), and previous education and training documents (transfer credit evaluations) must be retained for three years.

⁵ Registrar's Office is the Primary Responsibility User

⁶ Registrar's Office and Athletic Department are the Primary Responsibility Users

⁷ Registrar and Student Life Offices are the Primary Responsibility Users

Retention Schedule | Student Records Electronic Data

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|---------------------------------|--|------------------------------|-------|---------------|-------------------|
| Data change log | Electronic log of changes to enrollment and other data, including date/time stamp information and user that changed data if that data is maintained separately in system | 10 years | 2 | Electronic | SIS |
| Email data/information | Emails and other electronic communications that authorize academic/enrollment actions and/or provide directory/non-directory information about a student | UNAS ^B | 1, 2 | Electronic | SIS |
| Enrollment data | Electronic record of enrollment in classes, including records of drop, add and enrollment change activity | 10 years | 2 | Electronic | SIS, File |
| Grade data | Electronic record of submitted grades and grade changes, including date/time stamp and user data | P | 2 | Electronic | SIS, File |
| Student demographic information | Electronic student data including student characteristics, date of birth, former names, address information, photo ID and ethnic information, etc. | P | 2 | Electronic | SIS, File |

P: Permanent; **UNAS:** Until administrative need is satisfied

^A Or until the records retention requirement for the associated student record component is met (whichever is longer)

^B Based on the content of e-communication

¹ Email regarding student records that are transitory in nature can be discarded when no longer needed. Email and electronic communication that contains important information or that forms the basis or the results of an academic or administrative decision may need longer retention.

² Registrar's Office is the Primary Responsibility User

Publications, Statistical Data, and Institutional Reports

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|---|--|------------------------------|---------|-------------------|-------------------|
| Catalogs | Published annually, record of courses, degrees, and programs of study offered | P | 1, 3 | Electronic, Paper | Website, File |
| Commencement programs | Published record of graduates for public distribution | P | 1, 4 | Paper | File |
| Degree statistics | Record of degrees granted by college per graduation term and annually | P | 1, 3 | Electronic, Paper | SIS, File |
| Enrollment statistics | Per term report of enrolled students, e.g. by class, by course, totals, headcount, and FTE | P | 1, 3 | Electronic, Paper | SIS, File |
| Grade distribution and other grade statistics | Report of grades given, including summary grade point statistics by class | P | 1, 3 | Electronic, Paper | SIS, File |
| Instructor evaluations (by students) | | 1 semester or UNAS | 3 | Electronic | SIS, File |
| Race/ethnicity reporting | Report of student enrollment, graduation, and other metrics by race and ethnic origin | P | 1, 2, 3 | Electronic, Paper | SIS, File |

P: Permanent; UNAS: Until administrative need is satisfied

¹ The IRS requires that private schools maintain records reflecting the racial composition of the student body, faculty, and administrative staff for each academic year, and retain such records for a period of three years beginning with the year after compilation or acquisition.

² Section 504 of the Rehabilitation Act of 1973 requires that institutions maintain the necessary information and accurate compliance could be easily ascertained. In addition, racial and ethnic data are required to show the extent to which members of minority groups are beneficiaries of and participants in federally assisted programs. There is no time limit specified in the law.

³ Registrar's Office is the Primary Responsibility User

⁴ Registrar and Institutional Advancement Offices are the Primary Responsibility User

Family Educational Rights and Privacy Act (FERPA) Records

| Record Title | Description | Recommended Retention Period | Notes | Record Medium | Storage/ Location |
|---|---|------------------------------|---------|---------------------------|-------------------|
| Requests for formal hearing | Student-initiated request for formal hearing regarding amendment of education record | P ^A | 2, 4 | Electronic, Paper, Imaged | SIS, File |
| Requests for and disclosures of personally identifiable information | Necessary for compliance with recordkeeping requirements in FERPA | P ^B | 1, 2, 4 | Electronic, Paper, Imaged | SIS, Radix, File |
| Requests for nondisclosure of directory information | Student request to opt-out of directory information disclosure | P or UT | 3, 4 | Electronic, Paper, Imaged | SIS, Radix, File |
| Statements on content of records regarding hearing panel decisions | If student request for amendment of record is not granted, then student statement must be maintained in the record, and disclosed whenever the record is disclosed | P ^A | 4 | Electronic, Paper, Imaged | SIS, File |
| Written consent for records disclosure | i.e., FERPA Release form; student signed (electronic or paper) authorization for disclosure of education or discipline record | P ^C | 4 | Electronic, Paper, Imaged | SIS, Radix, File |
| Waivers for rights of access | Covers confidential letters and statements of recommendations related to the student's admission; application for employment, or receipt of an honor or honorary recognition (section 99.12 (b)(3)) | P ^A | 2, 4 | Electronic, Paper, Imaged | SIS, Radix, File |
| Written decisions of hearing panels | Decisions resulting from formal hearings regarding amendment of educational records | P ^A | 4 | Electronic, Paper, Imaged | SIS, Radix, File |

P: Permanent; UT: Until terminated by the student

^A As long as the record is maintained

^B As long as disclosed record is maintained

^C Or 360 days for one-time disclosure consents

¹ Requests for disclosure and disclosure of personally identifiable information by the institution must be maintained with the records that were disclosed as long as the records are retained. While disclosures with student consent and disclosures to other school officials are exempt from this requirement, many disclosures under the exemptions requiring student consent must be recorded. This list of disclosures must be provided to students upon request.

² Whenever the recommended retention period is the life of the affected record, the retention period of the FERPA document is meant to be the same as that of the student records to which it pertains: students' waivers of right to access to letters of recommendation, for example, should be retained until the letters themselves are destroyed. If the retention period for a record to which a FERPA document pertains is permanent, the FERPA document should also be permanently retained.

³ FERPA requires that requests to "opt-out" of disclosing directory information must be honored for former students no longer in attendance unless terminated by the student.

⁴ Registrar's Office is the Primary Responsibility User

Federal Disclosure Records

| Record Title | Description | <u>REQUIRED</u> Retention Period | Notes | Record Medium | Storage/ Location |
|--|--|--|-------|---------------------------------|---|
| Athletic Participation/EADA documents | | 3 years RD | 3 | Electronic, Paper | SIS, File |
| College costs, accreditation, textbook information, transfer credit policy | Complies with the Higher Education Opportunity Act | 3 years RD | 2 | Electronic, Paper | SIS, Radix, Website, eCampus, File |
| Crime statistics/Security reports | Complies with the Clery Act reporting requirements | 3 years RD | 1, 4 | Electronic, Paper | File |
| Graduation/completion, transfer-out data | Complies with Student Right-to-Know legislation | 3 years RD | 2 | Electronic, Paper | SIS, Radix, File |
| Institutional information (cost of attendance, withdrawal procedures, accreditation, etc.) | | 3 years RD/end of award year | 5 | Electronic, Paper, Imaged | SIS, Radix, Website, File |

RD: From date of required disclosure

¹ Campus Crime/Security Records and Reports must be established and disclosed annually to students and employees. The records should contain such information as: 1) institutional policies and proceeding for reporting crimes, 2) crime statistics, 3) describing of drug and alcohol abuse education programs, policies concerning possession, use, and sale of alcoholic beverages or drugs, 4) statement of sexual assault prevention programs, 5) statistics on number of arrest for violations of liquor, drug abuse, or weapons laws, 6) procedures for campus disciplinary actions for alleged sex offenses, and 7) statement of security and access policies for campus facilities.

² Registrar's Office is the Primary Responsibility User

³ Registrar Office and Athletic Department are the Primary Responsibility User

⁴ Registrar and Student Life Offices are the Primary Responsibility User

⁵ Registrar and Financial Services Office are the Primary Responsibility User

Federal Student Financial Aid (SFA) Record Retention Requirements

| Record Title/Description | <u>REQUIRED</u> Retention Period | Notes | Record Medium | Storage/ Location |
|---|--|-------|---------------------------------|----------------------|
| SFA Program Records | | | | |
| Accrediting and licensing agency review, approvals, and reports | 3 years AY | 1, 2 | Electronic, Paper, Imaged | Website, File |
| Audit reports and school responses | 3 years AY | 1, 2 | Electronic, Paper, Imaged | Website, File |
| Records pertaining to financial responsibility and standards of administrative capability | 3 years AY | 1, 2 | Electronic, Paper, Imaged | File |
| Program Participation Agreement | 3 years AY | 1, 2 | Electronic, Paper, Imaged | Website, File |
| Self-evaluation reports | 3 years AY | 1, 2 | Electronic, Paper, Imaged | Website, File |
| State agency reports | 3 years AY | 1, 2 | Electronic, Paper, Imaged | Website, File |
| SFA Fiscal Records | | | | |
| Bank statements for accounts containing SFA funds | 3 years AY | 1, 2 | Electronic, Paper, Imaged | File |
| Federal work-study payroll records | 3 years AY | 1, 2 | Electronic, Paper | File |
| Ledgers identifying SFA transactions | 3 years AY | 1, 2 | Electronic, Paper | File |
| Records of SFA program transactions | 3 years AY | 1, 2 | Electronic, Paper | File |
| Records of student accounts | 3 years AY | 1, 2 | Electronic, Paper | File |
| Records supporting data on required reports (SFA program reconciliation reports, audit reports and school responses, Pell Grant statements of accounts, accrediting and licensing agency reports) | 3 years AY | 1, 2 | Electronic, Paper | File |
| SFA Recipient Records | | | | |
| Application data submitted to the Department of Education or lender by the college on behalf of the student | 3 years AY | 1, 2 | Electronic, Paper | File |

Federal Student Financial Aid (SFA) Record Retention Requirements (continued)

| Record Title/Description | <u>REQUIRED</u> Retention Period | Notes | Record Medium | Storage/ Location |
|--|--|-------|---------------------------------|----------------------|
| Data used to establish student's admission, enrollment status, and period of enrollment | 3 years AY | 1, 2 | Electronic, Paper | SIS, Radix, File |
| Date and amount of disbursements | 3 years AY | 1, 2 | Electronic, Paper | SIS, Radix, File |
| Documentation of student's eligibility | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documentation of student's satisfactory academic progress | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documentation of student's program of study and enrolled courses | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documentation related to the receipt of aid, such as the amount of grant, loan, or FWS award, and calculations used to determine aid amounts | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documentation of initial or exit loan counseling | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documentation supporting the college's calculation of its completion/graduation or transfer-out rate | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Documents used to verify applicant's data | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Financial aid history for transfer students | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Reports and forms used to participation in the SFA program | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Student Aid Report (SRA) or Institutional Student Information Record (ISIR) | 3 years AY | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Requirements for Specific Aid | | | | |
| Borrowers eligibility records | 3 years AY ^{A,B} | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Campus-based aid (Perkins loan, SEOG, and Federal Work Study) | 3 years AY ^A | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |

Federal Student Financial Aid (SFA) Record Retention Requirements (continued)

| Record Title/Description | <u>REQUIRED</u> Retention Period | Notes | Record Medium | Storage/ Location |
|---|---|-------|---------------------------------|----------------------|
| FFEL and Direct Loans | 3 years AY ^A | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Fiscal Operations Report and Application to Participate (FISAP) | 3 years AY ^{A,C} | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Pell Grant | 3 years AY ^A | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| Perkins repayment records | 3 years from date of loan assigned, cancelled, or repaid | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |
| All other records/reports | 3 years AY ^{A,C} | 1, 2 | Electronic, Paper, Imaged | SIS, Radix, File |

AY: From award year

^A End of award year

^B Of student's last attendance

^C Of report submission

¹ College may be required to retain records for longer periods of time if the records are involved in SFA program review, audit, or investigation if the three-year retention period expires before the issue is resolved, records must be retained until resolution is achieved.

² Financial Aid Office is the Primary Responsibility User

Financial Services & Institutional Records

| Record Title/Description | <u>REQUIRED</u> Retention Period | Notes | Record Medium | Storage/ Location |
|---|--|-------|---------------------------------|----------------------|
| Accounting Records | | | | |
| General ledgers/trial balances | P | 1 | Electronic, Paper, Imaged | File |
| Financial audits | P | 1 | Electronic, Paper, Imaged | File |
| Depreciation schedules | P | 1 | Electronic, Paper, Imaged | File |
| Tax Documents | 7 years | 1 | Electronic, Paper, Imaged | File |
| Other miscellaneous documents | 7 years | 1 | Electronic, Paper, Imaged | File |
| Property Files | | | | |
| Deeds, legal descriptions, etc. | P | 1 | Electronic, Paper, Imaged | File |
| Insurance policies | 7 years ^{AE} | 1 | Electronic, Paper, Imaged | File |
| Claims | 7 years ^{AS} | 1 | Electronic, Paper, Imaged | File |
| Organization Structure | | | | |
| Board minutes, by-laws, articles of incorporation, etc. | P | 2 | Electronic, Paper, Imaged | File |
| Personnel files | 7 years ^{AT} | 1 | Electronic, Paper, Imaged | File |
| Insurance claims (including worker's comp) | P | 1 | Electronic, Paper, Imaged | File |
| Handbooks/Procedure manuals | 7 years | 1 | Electronic, Paper, Imaged | File |

^{AE} After expiration

^{AS} After settlement

^{AT} After date of termination

¹ Financial Services Office is the Primary Responsibility User

² The Office of the President and Financial Services Office are the Primary Responsibility User

RELATED CONTENT

State and Federal Statutes and Regulations

State and federal statutes and regulations related to records management and records retention include the following sections: state records, education records, financial records, health information records, human resources records, and research and sponsored programs records.

A. State records:

- a. Government Records Preservation Act, [K.S.A. 45-401 et seq.](#), defines government records, declares records to be state property, prohibits their unauthorized destruction, describes the State Records Board, requires state and local agencies to cooperate with the State Records Board and the State Archivist in regards to records, and stipulates the conditions for the destruction of records after imaging.
- b. Public Records Act, [K.S.A. 75-3501 et seq.](#), also defines records, creates and outlines responsibilities of the State Records Board, authorizes admissibility in court of micrographic and optical disc records, requires agency compliance with standards for micrographic and optical disc records, requires state agencies to maintain titles, deeds, or other records related to any real estate transactions conducted by the agency, provides guidelines for the use of acid-free and permanent paper, prohibits disclosure of individuals' social security numbers, but not access to full records containing that information.
- c. State Records Board, [K.A.R. 53-4-1](#), implements the Kansas Public Records Act and describes the duties of records officers.
- d. Kansas Open Records Act (KORA), [K.S.A. 45-215 to 45-223](#), declares records open for inspection unless otherwise provided by this act, requires the development of policies to provide prompt and convenient public access to government records for a reasonable fee, describes specific categories of records that are exempt from disclosure, state agencies have discretion to release some records exempted from disclosure by the KORA, provides that records exempted by KORA and still in existence will be open to the public after 70 years unless closed by another specific statute or regulation, provides description of enforcement actions and penalties for violations, requires the designation of a local freedom of information officer per office, requires a citizens' right to access brochure be available to the general public, provides for legislative review of exceptions, prohibits unlawful use of names derived from public records, and requires not-for-profit entities receiving public monies over a certain amount to retain and make publicly available records regarding the expenditure of those funds.
- e. Kansas Open Meetings Act (KOMA), [K.S.A. 75-4317 et seq.](#), defines meetings, declares meetings that conduct governmental affairs or governmental business transactions be open to the public, provides for public notices to be given regarding meetings, provides for exceptions when meetings may be closed, and describes penalties and enforcement actions.
- f. Kansas Uniform Electronic Transactions Act, [K.S.A. 16-1601 et seq.](#), allows for the use of electronic signatures and electronic recordkeeping.
- g. Tampering with a public record, [K.S.A. 21-5920](#), defines such as a class A nonperson misdemeanor.

B. Education records:

- a. Family Educational Rights and Privacy Act (FERPA), [20 U.S.C. §1232g](#); [34 C.F.R. Part 99](#): FERPA is a federal law protecting the privacy of student education records. It applies to all schools that receive funds under specified programs of the U.S. [Department of Education](#). Further information is available on the [Department of Education](#) and [Kansas State University Office of the Registrar](#) websites.

C. Financial records:

- a. Federal grant information, [2 C.F.R. Part 200.333-200.337](#), that pertains to record retention and access to Post Federal Award Requirements. Please see the Division of Financial Service's [Sponsored Programs Accounting](#) website for additional information.
- D. Health Information records:
- a. Health Insurance Portability and Accountability Act (HIPAA), [110 Stat. 1936](#): HIPAA is a federal law related to continuity of health insurance that also includes rules protecting privacy of health information. One of these rules, known as the Privacy Rule, applies to health care providers who transmit health information in electronic form. Further information is available on the [U.S. Department of Health and Human Services](#) website.
- E. Human Resources records:
- a. Records, Reports, Research and Evaluation of Personnel System: [K.A.R. 1-13-1a](#) defines the contents of an employee's official personnel file, and [K.A.R. 1-13-1b](#) relates to disclosure of employee information.
- b. [Federal Occupational Safety and Health Administration \(OSHA\) injury and illness recordkeeping and reporting requirements](#): Requirements for maintaining, posting and providing records of serious work-related injuries and illnesses.
- c. [Federal Department of Labor Family and Medical Leave guidance](#) (see Recordkeeping section).
- F. Research and Sponsored Programs:
- a. [Institutional Review Board Records in 45 C.F.R. §46.115](#): The Institutional Review Board (IRB) is responsible for the Research with Human Subjects program, and at Kansas State University the Committee on Research Involving Human Subjects serves as the IRB. In addition to requirements found within the CFR, please view the university's [IRB](#) website.
- b. The Animal Welfare Act (AWA), [7 U.S.C. §54](#): Kansas State University's Institutional Animal Care and Use Committee (IACUC) administers an animal care and use program following requirements in the AWA. Additional recordkeeping guidance can be found on the university's [IACUC](#) website.
- c. [NIH Guidelines for Research Involving Recombinant and Synthetic Nucleic Acid Molecules](#): These guidelines provide recordkeeping rules for the [Institutional Biosafety Committee \(IBC\)](#), which is responsible for the Kansas State University biosafety program.
- d. [United States Government Policy for Institutional Oversight of Life Sciences Dual Use Research of Concern \(DURC\)](#): This policy provides [DURC](#) recordkeeping guidance for the IBC.
- e. Select Agents guidance, [7 C.F.R. Part 331](#), [9 C.F.R. Part 121](#), [42 C.F.R. Part 73](#): The [University Research Compliance Office](#) uses these federal rules to manage records related to certain biological organisms and toxins, called the select agent program.
- f. Federal Acquisition Regulation, Contractor Records Retention ([F.A.R. Subpart 4.7](#)): This subpart provides recordkeeping rules for contractors to meet the records review requirements of the federal government. In this subpart, the terms "contracts" and "contractors" include "subcontracts" and "subcontractors."