

# **Bradley University**

## **Records Retention and Destruction Policy**

### **Policy Statement**

Bradley University requires that different types of records be retained for specific periods of time to comply with state and federal laws. Bradley University requires consistent treatment of records. Maintenance, retention, and disposal procedures for university records must be followed systematically by staff in official repositories. This policy is intended to ensure that the university meets legal standards.

### **Purpose**

The purpose of this policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed or of no value are discarded at the appropriate time. The purpose of this policy is also to preserve University history.

Records management and retention policies apply to all records, regardless of format. In today's environment, employees create and maintain an increasing portion of their records using computers. Electronic records must be managed alongside traditional records to ensure compliance with state and federal regulations.

Individuals responsible for the retention of records are also responsible for the destruction of records following the retention period. Records must be destroyed by shredding or other means to ensure that all sensitive or confidential material can no longer be read or interpreted.

### **Definitions**

For the purpose of this policy, "record" shall be interpreted to mean:

any papers, books, photographs, tapes, films, recordings, or other documentary materials, or any copies thereof, regardless of physical form or characteristics, made, produced, executed, or received by any department or office of the University or by any academic or administrative staff member in connection with the transaction of University business.

The term "electronic record" means any record that is created, received, maintained or stored on University local workstations or central servers. Examples include, but are not limited to:

1. electronic mail (e-mail)
2. word processing documents and spreadsheets

3. databases – all data generated via automated information systems including but not limited to student records, academic records, financial accounting records, and payroll records.

“Official records” are the records maintained by the various university units. Examples include, but are not limited to:

1. Controller’s Office – all financial records, bonds records, payroll records, student billing and loan records, etc.
2. IRT (Information Resources & Technology) – electronic records, etc.
3. Registrar’s Office – student academic records, etc.
4. Provost Office / Colleges– faculty records, etc.
5. Human Resources Office – Personnel records, insurance records, etc.
6. President’s Office – Board minutes, etc.

## **Procedures**

Each department will retain a listing of major documents used and maintained by the department detailing retention and destruction timetables (schedules). These schedules should be in accordance with all state and federal requirements. In addition, each department will review annually its records and forms to determine whether retention of these records and forms is adequate and appropriate.

Records can have historical value, even when no longer of immediate administrative value. If an office has any doubt if a record should be maintained, the appropriate Vice President should be contacted.

In the event of a governmental audit, investigation, or pending litigation, record disposition may be suspended at the direction of a Vice President. When litigation against the University or its employees is filed or threatened, the law imposes a duty upon the University to preserve all documents and records that pertain to the issues. As soon as the University is made aware of pending or threatened litigation, the appropriate University Vice President will notify the appropriate University employees/departments. The litigation hold directive overrides any records retention schedule that may have otherwise called for disposal or destruction of the relevant documents. The appropriate Vice President will inform employees/departments when litigation holds are cleared. Any electronic documents such as e-mail and computer accounts will need to be immediately maintained by the appropriate departments as well as Information Resources and Technology until the hold is released. No employee or department who has been

notified of a litigation hold may alter or delete any electronic records that falls within the scope of that hold. Violation of the hold may subject the individual to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

Records retention:

Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy.

No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in these tables should be addressed to the appropriate Vice President.

Please see the attached tables for records retention.

April 24, 2009

## Records Retention and Destruction Policy Tables

TYPE OF RECORD	Document	Retention Period
Institutional and Legal Records	Articles of Incorporation	Permanent
	Charter	Permanent
	By-Laws	Permanent
	Minutes of Trustee Meetings	Permanent
	Minutes of Trustee Committee Meetings	Permanent
	Licenses	Active
	Expired Licenses	6 years after expiration
	Deeds and Titles	Permanent
	Attorney documents	Permanent
	Leases	Active + 6 years
	Policy statements	Permanent
	Campus Crime Reports (annual)	Permanent
	Campus Security Act/Student Right to Know Act Compliance Records	Active + 3 years
	Federal Compliance Records	Active + 3 years
	Data/Statistics on Criminal Offenses	3 years
	Contracts	Active + 4 years
Patents and Trademark Records	Permanent	
Application Materials for Students who enter	Applications	5 years after date of last attendance
	Correspondence	5 years after date of last attendance
	Entrance Exams and Placement Scores	5 years after date of last attendance
	Letters of Recommendation	Until admitted
Application Materials for Students who are accepted but do not enter	Acceptance Letters	1 year after application term
	Applications	1 year after application term
	Correspondence	1 year after application term
	Transcripts	1 year after application term
Individual Student Records	Course Drop/Add Slips	5 years from date of last attendance
	Disciplinary Files	Permanent
	Class Schedules	5 years from date of last attendance
	Registration records	5 years from date of last attendance
	FERPA Requests	Life of requested record
	Transcript Requests	1 year
	Academic records	Permanent
	Date of Graduation and Degree Award	Permanent
	Degree Audit Records	5 years from date of last attendance
	Transfer Credit Evaluations	5 years from date of last attendance
	Personal Data Forms	5 years from date of last attendance
	Name Change Authorizations	5 years from date of last attendance
	Disciplinary Files	Permanent
	Tuition and Fee Charges	5 years from date of last attendance
General Student Records	Grade Statistics	Permanent
	Applicant Statistics	Permanent
	Enrollment Statistics	Permanent

	Racial/Ethnic Statistics	Permanent
	Student Handbooks	Permanent
	Tuition Deferment Forms	5 years from date of last attendance
	Loan Disbursement Forms	5 years from date of last attendance
	Degree Statistics	Permanent
Foreign Visitors	Foreign Student (I-20) (J and F) Immigration Document Forms	5 years from date of last attendance
	Foreign Scholars (J,H,O,etc.)	3 years after the last day of employment or immigration status
	F-1 and M-1 Visas	1 year following report to INS
	J-1 Visas	Active + 3 years
Compliance Records	HIPPA Compliance	6 years
	Title IX Records	Active + 5 years
	Title VI Records	Active + 5 years
	SEVIS Registration Records	Permanent
	Drug Free Schools and Communities Act Compliance Records	4 years
Financial Assistance Records	Financial aid transcripts	5 years
	FAFSA Profiles	10 years
	Financial aid awards	Active + 5 years
	FISAP/Supporting Documentation	3 years
	Lender's Name and Address	Term of entry + 10 years
	Promissory Notes	Active + Until loan is paid in full
	State/Outside Grant Scholarship Prog.	5 years
	Gift-fund Scholarships	Permanent
Employment Applications and Employment Listings	Job Announcements and Advertisements	2 years
	Documentation on Individuals not hired	2 years
	Individuals who are hired	Active + 5 years
	Individual employee files and wage history	Active + 7 years
	Wage Rate Tables	
Payroll Records	Salary or current rate of pay	Active + 7 years
	Payroll Deductions	Active + 7 years
	Timecards/sheets	Active + 7 years
	W-2 Forms	Active + 7 years
	W-4 Forms	Active + 7 years
Personnel Files	General files	Active + 7 years
	IPEDS Reports	Active + 7 years
	Employee manuals/ Faculty Handbook	Permanent
	Employee files/documentation	Permanent
	I-9s	3 years
	Employment history	Life
	Medical Records	Life
	Faculty tenure/promotion	Life
	Employee Medical and Health Records	Life
Education Assistance/Tuition Remission	Life	
Federal Tax Records	Form 941	Active + 7 years
	Form 990	Permanent
	Form 990-T	Permanent

	IRS Determination Letter	Permanent
	Form 1099s	Active + 7 years
	Form W-9	Active + 7 years
	Form 1042s	Active + 7 years
State Tax Records	Sales and Us Tax Reports and Support	Permanent
Accounts Receivable Records/ Purchasing	Student billing records	7 years
	Collection records	7 years
	Requisitions and support	7 years
Property records	Mortgages	Permanent
	Property documents	Permanent
Financial Records	Balance Sheet	Permanent
	General Ledgers	Permanent
	Bond Compliance records	Permanent
	Statement of Activities	Permanent
	Endowment records	Permanent
	Account Ledgers	Permanent
	Auditor's reports	Permanent
Institutional Publications	Course Catalogs	
	Statistical Profile	
	Directories	
Facilities Records	Layouts/plans	Permanent
	Permits	Permanent
	Maintenance	Permanent
	Hazardous Records	Permanent
Litigation Records	All records	Permanent
Internal Audit Workpapers	Workpapers	Permanent
Audits	Financial Audits	Permanent
	A-133 Audits	Permanent
	Sub-recipient Audits	Permanent
Personnel Benefits	403 (b) retirement plan	Permanent
	Life insurance	Permanent
	Disability insurance	Permanent
	Health insurance	Permanent
	Tuition Assistance Program	
Development	Donor records	Permanent
Personnel	Administrative employee files	As long as employed
	Faculty Records and Files	As long as employed
	Support staff files	As long as employed
IRT retention policies	<a href="http://helpdesk.bradley.edu/POLICIESmisc/emailretention.html">http://helpdesk.bradley.edu/POLICIESmisc/emailretention.html</a>	

NOTE: The adoption of this policy does not relieve or otherwise affect the pre-existing obligation of any department to maintain records relating to a matter under litigation, audit, or investigation. All such records should be preserved until the matter to which they relate has been finally resolved and University counsel has approved their disposition.

These tables are not all inclusive and are subject to change. Departments may have retention schedules which are specific to their records. These schedules should be documented and followed accordingly. The university follows the Record Retention and Disposal A Manual for College Decision Makers by Kent M. Meeks and Patricia Kussman.