

OCCIDENTAL COLLEGE



RECORD RETENTION POLICY

Last updated: 7/6/16
By: TC

100.1 Policy College Record Retention Policy

100.2 Statement

It is the College's policy regarding the retention and disposition of Occidental College records to comply with local, state and federal laws.

This policy applies only to departments having primary responsibility for the specific records contained in this policy - Financial Aid, Financial Affairs, Benefits, or Human Resources, for example.

100.3 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. This policy is also intended to preserve College history.

Records management and retention policies apply to all records, regardless of format, whether they be paper, electronic, or microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), and other more traditional media. The College encourages record retention in an electronic format whenever possible.

100.4 Administration

The Business office governs the retention and disposition of the College's records. Records designated as permanent (PERM) should specify a storage location. For example, Board of Directors minutes should note "Perm, transfer to College Archives after five years."

The records committee consists of the following: The College Vice Presidents. The records committee is authorized to perform the following functions:

- a. identify and evaluate which records should be retained;
- b.. monitor all departments for compliance with the record retention and disposition program.

Each department will review major documents used and maintained by the department and will compare these documents to the documents listed or referenced in the Record Retention Policy. Each department will regularly review the policy to determine the need for changes in the retention policy and periods. Requests for changes in retention periods or deviations from specified retention periods should be made to the Records Committee.

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, that individual should be directed to the College Archivist before destroying records not covered by the Policy.

In the event of a governmental audit, investigation, or pending litigation, record disposition may be suspended at the direction of the department. In addition, the College counsel should be informed upon notification of any such audit, investigation or litigation.

Litigation Holds

When litigation against the College or its employees is filed or threatened, the law imposes a duty upon the College to preserve all documents and records that pertain to the issue. As soon as College Counsel is made aware of pending or threatened litigation, a litigation hold directive will be issued to the legal custodians. The litigation hold directive overrides any records retention schedule that may have otherwise called for the transfer, disposal, or destruction of the relevant documents, until the hold has been lifted by College Counsel. E-mail and computer accounts of separated employees that have been placed on a litigation hold by College Counsel will be maintained by the campus Information Technology department until the hold is released.

No employee who has been notified by College Counsel of a litigation hold may alter or delete an electronic record that falls within the scope of the hold. Violation of the hold may subject the individual to disciplinary actions, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

Note: Electronic messages and their attachments are subject to discovery during litigation, governmental investigations, and audits, or if a FERPA request has been made. During litigation, electronic messages and their attachments are subject to discovery in the same way that paper, film, and other information is subject to discovery or access.

100.5 Applicability

This policy applies to all records generated in the course of the College's operation, including both original documents and reproductions. It also applies to records stored on computer and microform as well as paper records. This policy does not apply to records of individual faculty members except as such records may apply to the College's official business rather than the faculty member's research or teaching.

100.6 Definition

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

By law, College records are 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 College or by any academic or administrative staff member in connection with the transaction of College business, and retained by that agency or its successor as evidence of its activities or functions because of the information contained therein.

College records include the data generated via automated information systems. If your office has developed a computer application to manage some particular facet of its operations, the information in that system is considered a College record, whether or not you generate any actual paper or hard copy from it. You are not, however, responsible for information systems such as the accounting information system for which your office does not bear major responsibility. Although your office may access and/or input data into the accounting system, the responsibility for the system and its contents belongs to the business services-accounting office.

Non-Records

Certain categories of materials are not considered records:

—Stocks of printed or reproduced documents kept for supply purposes when file copies have been retained for records purposes; for example, handbooks or manuals prepared for the instruction of a particular course.

—Books, periodicals, newspapers, and other library and museum materials made or acquired and preserved solely for reference or exhibition purposes.

—Duplicate microfilm.

—Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes which do not represent significant basic steps in the preparation of the record document.

—Convenience copies of reports, memoranda, etc. for which your office was not the originator or the office of record, and which have not been annotated by your office.

—Materials not filed as evidence for department operations that have no informational value, such as telephone call slips, letters of transmittal, routing slips, etc.

When there is any doubt as to whether or not any document (paper or other format), record, or group of records is a College record, it should be considered an official record until determined otherwise.

Definition from University of Wisconsin-Madison

100.7. Retention Periods

Records designated as permanent (PERM) should designate the department responsible for the records. For example, Board of Directors minutes should note “Perm, transfer to College Archives after five years.”

Key:

ACT = while active, employed, or enrolled

LIFE = life of affected employee

PERM = permanent, transfer after five years.

PERM – ARCHIVES

PERM – REGISTRAR

PERM – EMMONS

PERM – OFFICE OF ADVANCEMENT

PERM – DEAN OF STUDENTS

PERM – TBD (to be determined)

OFF SITE STORAGE = location TBD (to be determined)

TYPE OF RECORDS	DOCUMENT	RETENTION PERIOD
INSTITUTIONAL AND LEGAL RECORDS	Articles of Incorporation	PERM – ARCHIVES
	Charter	PERM – ARCHIVES
	By-Laws	PERM – ARCHIVES
	Minutes of Directors' Meetings	PERM – ARCHIVES
	Minutes of Directors' Committee Meetings	PERM – ARCHIVES
	Licenses	ACT
	Expired Licenses	6 years
	Deeds and Titles	ACT + x years; PERM – ARCHIVES
	Attorney Opinion Letters (property)	ACT + 4 years
	Leases	ACT + 6 years
	Policy Statements	10 years
	Campus Crime Reports (annual)	4 years
	Campus Crime Reports (interim)	3 years
	Campus Security Act/Student Right to Know Act Compliance Records	ACT + 3 Years
	OFCCP (Office of Federal Contract Compliance Programs) Compliance Records	ACT + 3 Years
	Data/Statistics on Criminal Offenses	3 Years
	Contracts	ACT + 4 years
	Patent and Trademark Records	ACT + 6 years
	Academic Department-level Records	ACT + 4 years; PERM – ARCHIVES
	Associated Students of Occidental College records	ACT + 4 years; PERM – ARCHIVES
APPLICATION MATERIALS FOR STUDENTS WHO ENTER	Acceptance Letters	5 years after date of last attendance
	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	1 year
	Disciplinary Files (not including cases of Suspension or Expulsion)	ACT or 7 yrs after date of last attendance
	Disciplinary Files (in cases of Suspension or Expulsion)	PERM – DEAN OF STUDENTS
	Pass/Fail Requests	1 year
	Class Schedules	1 year after date of last attendance

	Registration Forms	1 year
	FERPA Requests	1 year
	Transcript Requests	1 year
	Academic Records	PERM – REGISTRAR
	Application for Graduation	1 year after date of last attendance
	Advanced Placement	5 years after date of last attendance
	Date of Graduation and Degree Award	PERM – REGISTRAR
	Career Services Records	ACT + 1 year
	Degree Audit Records	5 years after date of last attendance
	Transfer Credit Evaluations	5 years after date of last attendance
	Personal Data Forms	1 year after date of last attendance
	Name Change Authorizations	5 years after date of last attendance
	Disciplinary Letters (Academic and Behavioral) to students on overseas programs.	1 year
	Disability Records	7 years from date of last attendance
	BIT/SST files	7 years from date of last attendance
	Tuition and Fee Charges	5 years after date of last attendance
GENERAL STUDENT RECORDS (Statistical reports should be submitted to the College Archivist after the specified retention period. Other copies could then be destroyed).	Grade Statistics	10 years
	Applicant Statistics	5 years
	Enrollment Statistics	10 years
	Racial/Ethnic Statistics	3 years
	Medical Student Pictures	PERM – REGISTRAR
	Student I.D. Pictures	PERM -- TBD
	Student Handbooks	PERM – ARCHIVES
	Tuition Deferment Forms	5 years
	Loan Disbursement Forms (If applicable to division)	5 years
	Degree Statistics	10 years
FOREIGN VISITORS	Foreign Student (1-20) (J and F) Immigration Document Forms	3 years after the date of last attendance
	Foreign Scholars (J, H, O, P, PR, 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	ACT + 3 years
COMPLIANCE RECORDS	HIPAA Compliance Records	6 years
	Title IX Records	ACT + 3 Years
	Title VI Records	ACT + 1 Year
	Rehabilitation Act Compliance Records	ACT + 3 Years
	SEVIS Registration Records (I-17 and DS-3036)	PERM – TBD
	Drug Free Schools and Communities Act Compliance Records	4 Years
FINANCIAL AID RECORDS	Financial Aid Transcripts	5 years

	Applications	5 years
	Financial Aid Awards	ACT + 5 years
	Lender's Name and Address	ACT + 5 years
	IPEDS	3 years
	Promissory Notes	PERM – TBD
	Job Placement	ACT + 5 years
	Repayment History	ACT + 5 years
EMPLOYMENT APPLICATION AND EMPLOYMENT LISTINGS	Job Announcements and Advertisements	2 years
	Individual Applicants Who Are Not Hired Employment Applications	2 years
	Resumes	2 years
	Letters of Recommendation	2 years
	Background Investigation Results Note: The College must properly dispose of records of background investigations, which includes shredding or burning them, in order to comply with the FTC's disposal requirements. See http://www.ftc.gov/opa/2005/06/disposal.htm for details. This also applies to background investigations for people who are employed by Occidental College.	2 years
	Individual Applicants Who Are Hired Letters of Recommendation	ACT + 5 years
	Employment Applications	ACT + 5 years
	Background Investigation Results	ACT + 5 years
	Resumes	ACT + 5 years
	Medical Examinations	ACT + 5 years
PAYROLL RECORDS General Information	Individual Employee Files Wage or Salary History	6 years
	Wage Rate Tables	3 years
	Cost of Living Tables	1 year
	Salary or Current Rate of Pay	6 years
	Payroll Deductions	6 years
	Time Cards or Sheets	5 years
	W-2 Form	6 years
	W-4 Form	6 years
	Garnishments	ACT
I-9s	ACT + 3 Years	

	Employee Reimbursements through Genesys	ACT + 3 Years
PERSONNEL FILES Note: Two copies of each faculty and staff manual, together with any relevant revisions and amendments, are to be transferred to the Archives at the end of the specified period .	General Files IPEDS Reports	3 years
	Superseded Employee Manuals	PERM – ARCHIVES
	Expired Collective Bargaining Agreements	6 years
	Faculty Committee Evaluation Reports	ACT + 2 Years
	Grievance Files	5 years
	Family & Medical Leave Act Compliance Records	3 Years
	Faculty Files Correspondence Note: The records should transfer to College Archives five years after the departure of the faculty member.	ACT + 5 years; PERM – ARCHIVES
	Course Evaluation Forms	5 years
	Peer Review Documents	ACT + 7 years
	Scholastic Evaluation	ACT + 5 years
	Rank and Tenure Records	ACT + 5 years
	Faculty Committee Evaluation Reports	PERM – TBD
	Faculty Appointment/Promotion Applications C.V.	ACT + 5 years
	Letters of Appointment, Promotion and Tenure	ACT + 5 years
	Faculty Evaluations	PERM – TBD
	Faculty Handbooks	PERM – ARCHIVES
	Academic Calendars	PERM – ARCHIVES
	Individual Employee Files Employment Application or Resume	ACT + 5 years
	Employment History	ACT + 5 years
	Beneficiary Designation	ACT
	Emergency Contacts	ACT + 5 years
	Medical Records	ACT
	Promotions	ACT + 5 years

	Attendance Records	3 years
	Employee Evaluations	ACT + 5 years
	Transfers	ACT + 5 years
	Personnel Actions	ACT + 5 years
	Disciplinary Warnings and Actions	ACT + 5 years
	Layoff or Termination	ACT + 7 Years
EMPLOYEE MEDICAL, HEALTH AND SAFETY RECORDS	Exposed Employee Medical Records	30 years
	Accident Reports	6 years
	Employee Exposure Records	30 years
	Safety Records	6 years
	Employee Medical Complaints	6 years
	Faculty and Staff Assistance	5 years
	Employee Injury Records	6 years
PENSION AND BENEFITS RECORDS	Vesting	6 years
	Individual Employee Files	LIFE
	Education Assistance	LIFE of the employee AND through the life of the beneficiary
	Sick Leave Benefits	LIFE
	Retirement Benefits Accrued	LIFE
	401K Benefits Accrued	LIFE. If the participant is allowed to choose a “lump sum” payment, then the retention period is 6 years.
	Disability Records	LIFE. If the participant is allowed to choose a “lump sum” payment, then the retention period is 6 years.
	Actuarial Records	6 years
	Incentive Plans (after expiration)	6 years
	Pension Plan (after expiration)	6 years
	Retirement Plans (after expiration)	6 years
FEDERAL TAX RECORDS	Form 941	6 years
	Form 990	PERM – TBD
	Form 990-T	PERM – TBD
	IRS Determination Letter	PERM – TBD
	Form 1099s	6 years
	Form W-9	6 years
	Form 1042s	6 years
STATE TAX RECORDS	Form D-20	PERM – TBD
	Sales and Use Tax Reports and Support	PERM for all open (un-audited) periods – TBD
ACCOUNTS RECEIVABLE RECORDS	Receipts	4 years
	Accounts Receivable	4 years
	Accounts Receivable Ledgers	4 years
	Uncollected Amounts	4 years
	Collection Records	ACT
ACCOUNTS PAYABLE	Accounts Payable Ledgers	4 years

RECORDS	Purchase Requisitions (Purchasing)	4 years
	Invoices	4 years
	Payment/Disbursement Records	4 years
	Expense Reports	4 years
	Insurance Payments	4 years
	Royalty Payments	4 years
	Form 1099s	6 years
	Petty Cash Reports	4 years
	Procurement Card Reports	4 years
PROPERTY RECORDS CAPITAL PROPERTY	Depreciation Schedules	ACT + 4 years
	Property Records/Inventory	ACT + 4 years
	Equipment Inventory	ACT
	Mortgage Records	ACT + 4 years
	Property Improvement Records	ACT + 4 years
	Sales	4 years
PURCHASING/CONTRACTS CONTRACTS	Requisitions	4 years
	Leases, agreements and other contracts	3 years beyond the end of their term
	All Personnel Service Contracts with overseas individuals who provide support for GU students studying abroad	ACT + 3 years. Retained in OIP
FINANCIAL RECORDS	Balance Sheets	ACT + 4 years
	General Ledgers	ACT + 4 years
	Account Ledgers	ACT + 4 years
	Description of Accounting System	ACT
	Auditor's Reports	ACT + 4 years
	Departmental CSR Review and Reconciliation Log	Retain in department for two fiscal years.
INSTITUTIONAL PUBLICATIONS Note: Two copies of Institutional Publications are to be sent to the Archives for permanent retention at the end of the specified record retention. Other copies could then be destroyed.	Bulletins and Course Catalogs	10 years; PERM – ARCHIVES
	Student Newspapers	3 years; PERM – ARCHIVES
	Alumni Newsletters	3 years; PERM – ARCHIVES
	Alumni Directories	3 years; PERM – ARCHIVES
	Institutional Newspapers/Newsletters	3 years; PERM – ARCHIVES
	Student Directories	5 years; PERM – ARCHIVES
	Employee Directories	5 years; PERM – ARCHIVES
	College Press Publication List	5 years; PERM – ARCHIVES
FACILITIES RECORDS	Office Layouts	ACT
	Zoning Permits	ACT
	Building Permits	ACT + 1 year
	Building Plans and Specifications	PERM – ARCHIVES & FACILITIES
	Operating Permits	ACT
	Maintenance Records	ACT
	Motor Vehicle Records	ACT
	Air or Water Waste Emissions	3 years

	Hazardous Chemical Waste Records	5 years
	Laboratory Practices	ACT
LITIGATION RECORDS	Deposition Transcripts	ACT + 4 Years
	Discovery Materials	ACT + 4 Years
	Claims	ACT + 4 Years
	Court Documents and Records	ACT + 4 Years
	Litigation Files	ACT + 4 Years
INTERNAL AUDIT WORK PAPERS	Work Papers	7 years
INSTITUTIONAL RESEARCH IRB RECORDS Note: 15CFR27.115 spells out in detail the records of IRB activities that must be kept for 3 years, including proposals and correspondence www.gpoaccess.gov/cfr/index.html . A large proportion of proposals are never funded and the research is never undertaken. IRB must keep such proposals, correspondence, etc. on file for 3 years; the record that appears in the minutes, for example, is not sufficient by itself.	A-133 Audits	PERM – TBD
	Notice of Grant Awards	3 years from the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual report, as authorized by the Federal Agency. Refer to OMB Circular A-110; section 4 (e).53 (b) for exceptions, www.whitehouse.gov/omb/circulars/index.html .
	Sub-recipient Audits	3 years from the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual report, as authorized by the Federal Agency. Refer to OMB Circular A-110; section 4 (e).53 (b) for exceptions, www.whitehouse.gov/omb/circulars/index.html .
	Federal Contracts	3 years FAR 4.703 spells out that contractors shall make available books, records, documents, and other supporting evidence to satisfy contract negotiation, administration, and audit requirements of the contracting agencies and the Comptroller General for (1) 3 years after final payment or, for certain records, (2) the period specified in 4.705 through 4.705.3, whichever of these periods expire first
	Disclosure Statement (DS2)	PERM – TBD
	Indirect Cost Proposal	3 years from the submission date
PERSONNEL BENEFITS		
Form	Benefit	Time Period
Salary Reduction Agreement	403(b) retirement plans	6 – 10 years* . The time period is counted from the last possible event in a participant’s life, related to the Occidental College benefit specified (e.g., for life insurance, 6-10 years from the payment of the death benefit or from the termination of the policy, whichever is applicable), www.acgnet.gov/far/ .
TIAA-CREF enrollment	403(b) retirement plans	6 – 10 years*

TIAA-CREF distribution	403(b) retirement plans	6 – 10 years*
Maximum Exclusion Allowance calculation	403(b) retirement plans	6 – 10 years*
Life insurance enrollment	Life insurance	6 – 10 years*
Life insurance change	Life insurance	6 – 10 years*
Long Term Disability enrollment	Long term disability	6 – 10 years*
Occidental Health Plan enrollment	Health insurance	6 – 10 years*
Occidental Health Plan Student Certification	Health insurance	6 – 10 years*
Kaiser HMO enrollment	Health insurance	6 – 10 years*
Kaiser HMO change	Health insurance	6 – 10 years*
Blue Cross Blue Shield enrollment	Dental insurance	6 – 10 years*
Blue Cross Blue Shield change	Dental insurance	6 – 10 years*
Blue Cross Blue Shield student certification	Dental insurance	6 – 10 years*
Prudential DMO enrollment	Dental insurance	6 – 10 years*
Flexible benefits enrollment	Flexible benefits	6 – 10 years*
Flexible benefits change	Flexible benefits	6 – 10 years*
Tuition Application	Tuition Assistance Program	6 – 10 years*
DEVELOPMENT RECORDS	Gift Agreements	PERM – OFFICE OF ADVANCEMENT
	General Correspondence with Major Donors – NOTE: Donor files may be microfilmed after the death of the donor or as the amount of documentation gets too bulky. This is usually information that is over 15 years old.	PERM (Donor Files) – OFFICE OF ADVANCEMENT
	Original Gift Batches	Maintained in Gift Accounting for 3 years then moved to off site storage; PERM – OFFICE OF ADVANCEMENT
	Documentation for Gifts over \$10,000 – Note: Documents scanned and stored on database	PERM (donor files) – OFFICE OF ADVANCEMENT
	Trusts/Bequests	PERM (Donor files) – OFFICE OF ADVANCEMENT

Procedure:

Each office or department will evaluate the files and/or records for which they are responsible each June to determine which files and/or records are to be destroyed in accordance with this policy.