

# VILLANOVA UNIVERSITY

## RETENTION AND MANAGEMENT OF UNIVERSITY RECORDS

### OVERVIEW

Villanova University is committed to utilizing effective records management practices in order to preserve its history, meet legal requirements, maximize limited space, and ensure outdated and needless records are destroyed. This policy establishes the University's requirements for the systematic management of University records, including the responsibilities related to identifying, managing and preserving records that should be part of the University Archives and the living heritage of Villanova University. These maintenance, retention and destruction procedures should be followed by all employees.

### PROCEDURES

#### Definition of Records

A "record" is anything created in connection with University business that contains information in any medium (paper, electronic, video, etc.) in any form (handwritten, draft, etc.), created at any time and maintained at any location. It includes electronically stored information ("ESI"): emails, word processing documents, calendars, voice messages, instant messages, spreadsheets, videos, photographs and all other data in any other locations where ESI may be stored, such as a PC, laptop, PDA, flash drive, diskette, zip disk, compact disc, DVD, portable hard drive, smartphone, etc.

#### Retention Periods

- The attached Record Retention Schedule is a table describing categories of records and providing a length of time for which the records should be kept. The Retention Schedule also includes instructions for the final disposition of a record.
- The Retention Schedule lists the most common records of the University. However, almost every department or office will have records requiring retention that are not on the Schedule. If there is confusion as to what the final disposition should be for a record that is not listed and is considered Inactive, please contact the Office of the Vice President and General Counsel or the University Archivist.
- Department heads are responsible for identifying records that must be retained and implementing appropriate storage procedures. They also are responsible for identifying those records relevant to their area of responsibility that should be destroyed because the retention period has elapsed.
- Records which have historical, administrative or research value to the University and which are intended to be kept indefinitely are considered permanent or archival records. The University Archivist will assist in identifying and classifying records as archival, and any questions should be directed to that office.

## Record Storage and Accessibility

- Active records (those frequently used by a Department) should be stored in the applicable Department in accordance with customary practices.
- Inactive records (those that have not been needed for more than a year but that may not be disposed of under the Record Retention Schedule) should be labeled and stored for the balance of the retention period set forth in the Record Retention Schedule. Each department may decide where to store such records (either within the department or with an off-site archival service).
- Records stored in the department must be protected against misuse, misplacement, damage, destruction, theft, or the inadvertent disclosure of confidential information.
- All records, whether Active or Inactive, must be easily retrievable for examination by authorized administrators, government or internal auditors, law enforcement agents, and other authorized individuals. Regardless of where Inactive records are stored, the department of origin is responsible for maintaining files or logs describing the contents of stored records and for retrieving records upon official request.
- Department heads, in consultation with UNIT personnel, are responsible for ensuring that electronic records are not rendered unusable because of changing technology or deterioration. Records in formats endangered by technology changes must be transferred to other formats in order to maintain accessibility.

## Disposal

- At the end of the appropriate retention period, records, including ESI, not meant for permanent retention either in the department or in the University Archives should be destroyed. Records that contain confidential information (as described below) must be disposed of in accordance with the procedures that follow. Records that do not contain any confidential information may be disposed of utilizing general recycling practices.
- Department heads should consult with the University Archivist to arrange for the transfer of records scheduled for retention in the Archives.

## Suspension of Disposal Process

- Upon service of a subpoena, summons, or similar court order or notice, or upon learning of an internal or governmental investigation or audit, or if a claim is made, whether formal or informal, or a dispute arises, the Records Retention Schedule shall be suspended for those departments or persons affected.
- Affected individuals will be notified by the Vice President and General Counsel's staff of the need to preserve paper documents and ESI that may be relevant to an action mentioned above. **In such case no records, including ESI, that are arguably relevant to the legal process, claim, dispute, investigation, or audit may be destroyed except by permission of the Vice President and General Counsel's Office.** Employees must take all reasonable steps to preserve such records, including

removing auto-delete functions, moving into a separate folder, and working with UNIT to ensure that the preservation has been set up properly.

- ESI must be preserved in its original electronic form so that it (and all information contained within it, whether visible or not) can be retrieved, if necessary, at a later time. It is not sufficient to make a hard copy of the ESI.

### **Inventory of Destroyed Records**

- Department heads must maintain an inventory describing and documenting destroyed records by general category, as well as the date and method of destruction. The inventory of destroyed records itself must not contain confidential information. This inventory may be retained in paper or electronic format.

### **Confidential Records**

- The following types of records must be kept strictly confidential (except that such records may be shared among appropriate University officials when necessary to perform the functions of their positions, and student records may be shared with University officials and others in accordance with the Family Educational Rights and Privacy Act):
  - Individual employment records of current or former faculty members, administrators, other staff members or student employees, including records that concern hiring, appointment, promotion, salary, performance, termination or other circumstances of employment, unless the faculty member, administrator, staff member, or student employee grants access in writing;
  - Individual records of current and former students or applicants;
  - Records that include:
    - Personally identifiable information (“PII”) (including name, Social Security number, date of birth, driver’s license number, alien registration number, passport number, employer identification number, student identification number or computer Internet Protocol address);
    - Medical or psychological treatment records or other health information (when stored electronically “ePHI”);
    - Financial Information (such as W-2s, credit card numbers, bank account numbers, or other similar financial transaction information);
    - Development information (anonymous donors, donation amounts, or related information)
    - Other records where usage might constitute an invasion of privacy; and
  - Records the use or confidentiality of which has been restricted by agreement.

### **Storage of Confidential Records**

- ESI that contains PII, ePHI or other confidential information should never be stored in an unencrypted format. This includes on workstation hard disks, server storage,

emails, flash/thumb drives, cloud services or any other location. Encryption type and implementation can vary based on the system that stores the information, but it should follow industry standards for encryption such as NIST SP-800-57, NIST SP-800-111, FIPS-140 or other related standard. If you are unsure of how to protect your confidential electronic data, please contact UNIT.

- Physical media that contains PII or other confidential data should be secured so that only authorized individuals can access the information. Media must never be left out (on a desk, bulletin board, mail slot, shared or unlocked cabinet, etc.) where it could be accessed by unauthorized individuals.

### **Disposal of Confidential Records**

- Department heads responsible for the destruction of confidential records must assure that the method of destruction does not permit recovery, reconstruction, and future use of confidential information. An overview of these methods follows below.
  - **Paper records** containing confidential information must be shredded or pulped, not simply thrown out with other classes of records or with miscellaneous trash. The University Recycling Department can be contacted to assist with destruction of large volumes of paper records. Any documents that are being temporarily stored awaiting destruction must be physically secured.
  - **Electronic or machine-readable records** containing confidential information must either be physically destroyed or erased beyond recovery before being discarded or reused. Destruction of ESI should be accomplished through a certified vendor, which will provide detailed records of the media presented for destruction with date/time stamps as well as the method of destruction utilized to render ESI unreadable and unrestorable. Contact Procurement or UNIT for details.
  - **Film, audio, and videotapes** containing confidential information should also be physically destroyed, not simply thrown away. It is possible to overwrite audio and videotapes with other, non-confidential sound and images, but if this is done, it is recommended that it be done under the guidance of UNIT.
- Confidential records may be destroyed by an approved outside vendor. Contact the Procurement Department for further information.
- Personnel files of former workers should not be destroyed by individual departments; such records should be transferred to Human Resources when an employee departs from the University.

### **Credit Card Processing and PCI DSS Compliance**

Because the University adheres to the Payment Card Industry Data Security Standard (PCI DSS), certain special provisions must be followed regarding data handling and retention in connection with credit card processing\*.

\*Based on version 2.0 of the PCI DSS released on October 26, 2010.

- No sensitive authentication data should be stored after card authorization, even if that data is card encrypted. This includes, but is not limited to the following:
  - Full magnetic stripe from a card or chip.
  - The card verification code or value (CVC2, CAV2, CID, CVV2).
  - The personal identification number (PIN) or encrypted PIN block.
- During the normal course of business it is permissible to temporarily retain the cardholder's name, Primary Account Number (PAN), expiration date, and service code. These elements should be retained for only as long as is necessary regarding a specific transaction, with a maximum retention period of one year.
- Backup tapes that contain confidential cardholder data must be clearly labeled as containing cardholder PII and stored in a separate secure location away from other general backup tapes.
- All logs that pertain to systems located in the Cardholder Network must be stored for one year with at least three months records available in a readily accessible format.

### **Faculty Records**

Academic departments are responsible for maintaining and preserving information about curricular offerings and the history of the department as a teaching and research unit. Faculty members are encouraged to contact the University Archives when they retire to discuss the retention of their papers and records for historical preservation.

### **Villanova University Archives**

The Villanova University Archives serves as the institutional memory of the University. The University Archives was established in 1960, and its Statement of Authorization for Archival Collection and preservation of University Records received approval from the University President in 1987. Renewed in 1989, this approval continues presently. It is the official repository for Inactive University records having permanent historical value that are no longer needed by the offices that generated these records. The primary mission of the University Archives is to collect, appraise, organize, describe, preserve and make accessible institutional records and other materials of enduring value in all formats that reflect the history and development of Villanova University.

The University Archives strives to provide adequate facilities for the retention and preservation of official university records in addition to facilitating efficient management of records to ensure that permanently valuable records are preserved. In collecting these materials, the University Archives recognizes and honors matters of privilege and confidentiality.

The University Archives promotes knowledge and understanding of the origins, aims, programs, development and goals of the University. Its primary purpose is to document the history of the University and to provide source materials for administrators, faculty, students, alumni, and other members of the University community, as well as interested persons who seek to evaluate the impact of the University's contributions to the community. The records created today will become historically valuable for tomorrow's scholars.

- **CONTACTS**

<b>Contact</b>	<b>Topic</b>	<b>Telephone</b>
UNIT	Provides guidance to the University regarding electronic media storage and destruction of ESI.	(610) 519-4402
University Archivist	Provides guidance to the University Community regarding Micrographic Preservation and Permanent Storage of Archival Records.	(610) 519-4133
Office of the Vice President and General Counsel	Provides guidance to the University community regarding the legal requirements for the retention and destruction of records, particularly in those areas where litigation or any enforcement action against Villanova is pending or threatened.	(610) 519-7857
Directors or Chairs of Departments	Responsible for implementation of this policy as it relates to their departments; authorize the disposal of records, maintain a list of destroyed records in the departmental files, and assure that records containing confidential information are destroyed in compliance with this policy.	Varies
Department of Human Resources	Provides guidance to University community regarding retention of employment documentation, including applications, resumes, reference checks and interview notes, employee discipline notes and memos, and performance appraisals.	(610) 519-7900
Office of Financial Assistance or ORSP	Responsible for the implementation of this policy as it relates to student employment documentation	(610) 519-6456/4420
Financial Affairs	Provides guidance on the retention of procurement and financial reporting documents.	(610) 519-4540
Registrar	Responsible for the implementation of this policy as it relates to student records.	(610) 519-4032

# RECORD RETENTION SCHEDULES

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# RECORD RETENTION SCHEDULES

## UNIVERSITY-WIDE RECORDS\*

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Accreditation and Licensing Records	Permanent	Copy to Archives
• Brochures	5 years from creation	Archives
• Official University Committee Records (non-confidential)	3 years	Archives
• Consultant Reports	3 years from completion	Archives
• Correspondence or Emails of Particular Historical Importance/Value	1 year	Archives
• Departmental Reports	3 years	Archives
• Handbooks	5 years	Archives
• Program Reviews	5 years	Archives
• Self Studies	3 years	Archives
• Task Force Reports	3 Years	Archives

## GOVERNANCE\*\*

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Board of Trustee & Committee Minutes	Permanent	Copy to Archives
• Bylaws	Permanent	Copy to Archives
• Charter	Permanent	Copy to Archives

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\* To the extent applicable, this section is meant to apply to all Academic and Administrative Departments.

\*\* Maintained by the President's Office.



- University Senate Minutes      Permanent      Copy to Archives

## **ACADEMIC AFFAIRS**

### ***ACADEMIC DEPARTMENTS***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Academic Advising Records	10 years from graduation or last date of attendance	Destroy
• Academic Integrity Code	Until graduation or 5 years from date of last attendance if violation is noted on transcript	Destroy
• Catalogs	Permanent	Copy to Archives
• Course Syllabi	10 years from date of course's last offering	Destroy
• Curriculum, Curriculum Proposals, and Curriculum Changes	10 years	Archives
• Faculty Meeting Minutes	10 years	Archives
• Policies and Procedures	10 years	Archives
• Scholarship and Professional Papers	10 years	Archives

### ***ACADEMIC PERSONNEL\****

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• CATS Summary Data	10 years	Destroy
• Faculty Committee Evaluation Reports	15 years	Destroy
• Faculty Handbook	Permanent	Copy to Archives
• Grievances	6 years after separation	Destroy
• Peer Review Documents	6 years after separation	Destroy

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\* See Human Resources Section for additional retention requirements relating to employment records of academic personnel.

- Personnel Files, Appointment Letters & Forms 10 years after separation (6 years for adjuncts) Destroy
- Tenure or Promotion Dossiers 10 years after separation Destroy
- Former Faculty Records 10 years after separation Destroy

***INTERNATIONAL STUDIES***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Program Evaluation Documents	10 years after end of relationship with program	Destroy
• Waivers (trips <u>not</u> involving Minors under 18)	3 years after completion of trips	Destroy
• Waivers & Parental Consent Forms (trips involving Minors under 18)	Permanently	

***LEARNING SUPPORT SERVICES***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Learning Support Records	10 years from graduation or date of last attendance	Destroy

***SPONSORED RESEARCH***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Animal Welfare Records	3 years or Contract Period, whichever is greater	Destroy
• Grant & Contract Applications, Proposals & Supporting Documentation	7 years after close of Grant (state); 3 years after close of Grant (federal)	Destroy
• Human Subject Records	3 years or Contract Period, whichever is greater	Destroy
• Protocols and Related		

Documents	Permanent	Office Retention
• Scientific Records	7 years	Archives

## **ADVANCEMENT**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Non-Confidential Alumni Records	3 years	Archives
• Gift records	7 years	Destroy
• Original Gift Agreements	Permanent	Office Retention
• Planned Gifts (trusts, life income, annuities) & Real Estate Gifts	Permanent	Office Retention
• Fundraising solicitation materials	3 years	Destroy

## **ATHLETICS**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Agent Registration Documents	2 years after removal from registration list	Destroy
• Athletic contest scores and statistics	Permanent	Copy to Archives
• Athletic programs and media guides	Permanent	Copy to Archives
• Drug Testing Consent Forms	7 years	Destroy
• FERPA Consents	5 years after date of last attendance	Destroy
• NCAA Infraction and case files	7 years or length of sanctions	Destroy
• Recruiting Information	5 years after graduation or date of last attendance	Destroy
• Student-Athlete Statement	7 years	Destroy
• Student files	5 years after graduation	Destroy

or date of last attendance

- Summer Camp:  
Waivers & Parental Consent  
Forms Permanent
- Summer Camp:  
Fingerprint Reports Permanent
- Title IX Compliance Reports 7 years Destroy

## **COMMUNICATIONS**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Academics Magazine	Permanent	Copy to Archives
• Alumni Newsletters	5 years	Archives
• Alumni Directories	5 years	Archives
• Campus Maps	1 year	Archives
• College/School Magazines	Permanent	Copy to Archives
• Commercial Videos	Permanent	Copy to Archives
• Consents for photos and videotapes	5 years	Destroy
• Institutional Newspapers/ Newsletters	Permanent	Copy to Archives
• Employee Directories	5 years	Archives
• General Q & A's	5 years	Destroy
• Neighbor's Newsletters	Permanent	Copy to Archives
• Parent Newsletters	5 years	Archives
• Photos and Videotapes	5 years	Archives
• President's Reports	Permanent	Copy to Archives

- |  |           |                  |
|--|-----------|------------------|
| • Press Releases                                     | Permanent | Copy to Archives |
| • Publications and articles about staff and students | Permanent | Copy to Archives |
| • Strategic Plans                                    | Permanent | Copy to Archives |
| • Student Directories                                | 5 years   | Archives         |
| • Student Newspapers                                 | Permanent | Copy to Archives |
| • Survey/Ranking Results                             | Permanent | Copy to Archives |
| • Videos of Press Conferences                        | Permanent | Copy to Archives |
| • <i>Villanova Magazine</i>                          | Permanent | Copy to Archives |

## **ENROLLMENT MANAGEMENT\***

### ***ADMISSIONS***

**APPLICANTS WHO DO NOT ENROLL** (includes students who are admitted, waitlisted, denied or did not complete an application)

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Applications for Admission or Readmission	3 years from start of application term	Destroy
• Decision Letters (Template)	3 years from start of application term	Destroy
• Correspondence, General (Templates)	3 years from start of application term	Destroy
• Financial support materials for international students (including, but not limited to – Certification of Finances, bank letter, sponsorship letter, I-94 card if applicable, etc.)	5 years from start of application term	Destroy
• Resume/List of Activities	3 years from start	Destroy

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\* To the extent record categories are not listed here, please use retention period set forth in the American Association of Collegiate Registrars and Admissions Officers' Retention of Records: Guide for Retention and Disposal of Student Records.

	of application term	
• Standardized Test Scores	3 years from start of application term	Destroy
• Transcripts	3 years from start of application term	Destroy
• Viewbooks/Road and Visit Brochures	3 years from start of application term	Archives
• Copies of advertisements for student recruitment and other promotional and recruiting efforts (sample template)	3 years from start of application term	Archives
• Minor Participation Consent and Release Forms	Permanent	
• Participation Consent and Release Forms	3 years	Destroy

### ***APPLICANTS WHO DO ENROLL***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Applications for Admission or Readmission	5 years from graduation or date of last attendance	Destroy
• Acceptance Letters (electronic copies in merged files)	15 years from date of admission	Destroy
• Correspondence	5 years from graduation or date of last attendance	Destroy
• Financial support materials for international students (included, but not limited to – <i>Certification of Finances, bank letter, sponsorship letter, I-94 card if applicable, etc.</i> )	5 years from start of application term or date of last attendance	Destroy
• Required Letters of Recommendation	Until admitted	Destroy

- Standardized Test Scores 5 years from graduation or date of last attendance Destroy
- Transfer students – previous education and training (transcripts) 5 years from graduation date or date of last attendance Destroy

***FINANCIAL AID***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Applications	5 years from graduation or date of last attendance	Destroy
• Evidence of non- discriminatory basis of awards	3 years from graduation or date of last attendance	Destroy
• Financial Aid Awards	5 years from graduation or date of last attendance	Destroy
• FISAP	3 years from end of award year in which the report was submitted	Destroy
• Lender’s Name and Address	5 years from graduation or date of last attendance	Destroy
• 1-9 Forms (Students)	3 years or 1 year after separation (whichever is later)	Destroy
• Job Placement	5 years from graduation or date of last attendance	Destroy
• Original Promissory Notes	Life of the loan plus 4 years	Destroy
• Repayment History	5 years from graduation or date of last attendance	Destroy
• Truth in Lending Disclosures for Private Loans (template plus proof of delivery)	Life of the loan plus 4 years	Destroy

***REGISTRAR***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Academic Action Authorizations	10 years from graduation	Destroy

	or date of last attendance	
• Advanced Placement Credit Records	5 years	Destroy
• Change of Course Forms	5 years from change	Destroy
• Change of Grade Forms	Permanent	Office Retention
• Change to SSN or Student ID Number	Permanent	Office Retention
• Commencement Programs	Permanent	Copy to Archives
• Curriculum Change Authorizations	5 years from graduation or date of last attendance	Destroy
• Degree, Applicant Grade, Enrollment & Racial/Ethnic Statistics	10 years	Archives
• External Transcripts	Permanent	Office Retention
• FERPA Consents & Disclosures	Life of underlying record	Destroy
• FERPA Requests to Review	Life of underlying record	Destroy
• Graduation Lists	Permanent	Copy to Archives
• Hold or Encumbrance Authorizations	Until Released	Destroy
• Name Changes	Permanent	Office Retention
• Original Grade Sheets	Permanent	Office Retention
• Schedule of Classes (Institutional)	Permanent	Copy to Archives
• Student Class Schedules	1 year from graduation or date of last attendance	Destroy
• Student Registration Forms	5 years from registration	Destroy
• Surveys conducted by Registrar		
➤ External Data Requests		



(electronic submissions)	Permanent	Office Retention
➤ External Data Requests (paper submissions)	7 years	Destroy
➤ Original Completed Surveys	5 years from date administered	Destroy
➤ Survey Reports (paper and electronic)	Permanent	Office Retention
• Transcripts	Permanent	Office Retention
• Transcript Requests	1 year from submission date	Destroy
• Transfer Credit Evaluations	5 years from graduation or date of last attendance	Destroy
• Veteran Administration Certificates	5 years from graduation or date of last attendance	Destroy
• Withdrawal Authorizations/ Leaves of Absence	5 years from implementation	Destroy

## **FINANCE and ADMINISTRATION**

### ***CONTROLLER'S OFFICE (Accounting & Budget)***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Account Reconciliations	7 years	Destroy
• Annual Audited Financial Statements	Permanent	Office Retention
• Audit Work Papers	7 years	Destroy
• Banking Records (Bank Statements & Reconciliation, Voided and Cancelled Checks)	7 years	Destroy
• Budget Transfers	7 years	Destroy
• Capital Budget Reports	7 years	Destroy
• Capital Equipment Records	Life of Asset (records of Equipment purchased with Federal Funds must be retained for three years after final disposition)	Destroy

• Deactivated Accounts Documents	7 years	Destroy
• Deposit records/Cash Receipts	7 years	Destroy
• Depreciation Records	Life of Asset + 7 years	Destroy
• Expenditures of tax-exempt bond proceeds	Life of Bond	Destroy
• FAAPROVE documents	7 years	Destroy
• Faculty & Staff Headcount Reports	Permanent	Copy to Archives
• Final Fiscal Year Reports (Banner)	7 years	Destroy
• Fiscal Year Budget Detail	7 years	Destroy
• Grant-related financial records	7 years after close of Grant (state); 3 years after close of Grant (federal)	Destroy
• Index, Fund, Grant Name Changes	7 years	Destroy
• Inventories	7 years	Destroy
• Journal Entries & Back-up Documentation	7 years	Destroy
• New Index Requests (endowments)	Permanent	Office Retention
• New Index Requests (grants)	Life of the grant or property received	Office Retention
• New Index Requests (restricted funds, other)	7 years	Destroy
• Overlap School Financial Data	7 years	Destroy
• Strategic Plans and Projections	Permanent	Office Retention
• Position Control Requests	Permanent	Office Retention
• Quarterly YEPS Analysis	5 years	Destroy

- Summary Analysis Reports, End of year (Fund, Source, Function) 7 years Destroy
- Third Party Requested Reports/ Surveys (monthly, quarterly, yearly, etc.) 7 years Destroy
- Trial Balances 7 years Destroy
- Travel Reimbursements & Attachments 7 years Destroy
- University Audit Work Papers 7 years Destroy

***AUXILIARY AND CONFERENCE SERVICES***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Bookstore sale data	3 years	Destroy
• Contracts	5 years after expiration or termination	Destroy
• Fingerprint reports	Permanent	
• Summer Program Waivers (programs <u>not</u> involving minors)	3 years after end of program	Destroy
• Summer Program Waivers and Parental Consents (Programs involving Minors under (18))	Permanent	

***BURSAR***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Cashier Sessions	7 years	Destroy
• Collection Paid in Full Files	7 years	Destroy
• Collection Writeoff Files	Permanent	Office Retention
• IRS-1099 Misc. Payee List & Electronic Filing Data	3 years	Destroy
• IRS 8300 Forms	7 years	Destroy

• Perkins Loan Paid in Full Files	7 years	Destroy
• Private Scholarship Information	7 years	Destroy
• Refund Information	7 years	Destroy
• Student Loan Records	5 years after the loan has been repaid in full	Destroy
• Third Party Credit Information	7 years	Destroy
• Tuition and Fee Charges	6 years	Destroy
• Vault Counts	7 years	Destroy
• Virtual Merchant (credit card info.)	7 years	Destroy
• VU Credit Info (remission, tuition waivers, etc.)	7 years	Destroy

## ***FACILITIES***

### ***CONSTRUCTION***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• As-built Drawings	Permanent	Copy to Archives
• Contracts and Agreements	7 years after completion of construction project	Destroy

### ***ENVIRONMENTAL HEALTH & SAFETY***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Asbestos Records	30 years	Destroy
• Blood Borne Pathogens	3 years	Destroy
• Emergency Plan Document	5 years	Destroy
• Ergonomic Reviews	5 years	Destroy
• Evacuation Drill Records	5 years	Destroy
• Fire Department Inspections	4 years	Destroy

• Fire Protection Systems Record	5 years	Destroy
• Fume Hood Testing Records	5 years	Destroy
• Hazardous Waste Disposal Manifests & Reports	Permanent	Office Retention
• Hygiene Sampling	3 years	Destroy
• Incident Records	5 years	Destroy
• Internal Safety Inspections	5 years	Destroy
• Material Safety Data Sheets	30 years	Destroy
• OSHA Reports	6 years	Destroy
• Operational Manuals	5 years	Archives
• Portable Extinguisher Training Records	3 years	Destroy
• Radiation Dose Reports	Permanent	Office Retention
• Radiation Safety Training Records	3 years	Destroy
• Radioactive Materials License & Safety Committee Records	Permanent	Office Retention
• Radioactive Material Receiving Inventory Records	3 years	Destroy
• Testing Results (air quality, mold, lead, etc.)	10 years	Destroy
• Training Records	3 years	Destroy

***REAL PROPERTY***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Property Deeds, Easements, Licenses, Rights of Way, Rights of First Refusal, Remainder Interests, Mortgages.	Permanent	Copy to Archives
• Property Tax Returns filed with Taxing Jurisdiction	7 years	Destroy

- Title Insurance Policies 10 years after disposal of property Destroy
- Leases 7 years after expiration Destroy
- Surveys 5 years Archives

***INSURANCE AND RISK MANAGEMENT***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Certificates of Insurance	5 years after expiration	Destroy
• Indemnification Agreements	5 years after expiration	Destroy
• Hold Harmless Agreements	5 years after expiration	Destroy
• Contracts	5 years after expiration	Destroy
• Claims Files	7 years after claim closure	Destroy
• Insurance Policies (Liability, Property, Workers' Comp and Other Policies)	Permanent	Office Retention
• Incident Reports & Accident Reports	5 years after report date	Destroy
• Motor Vehicle Record Review Consent Forms and Results	3 years after end of employment or student's graduation	Destroy
• Volunteer Registration Forms, Participant Waivers & Agreements (events <u>not</u> involving Minors under 18)	3 years after event date	Destroy
• Volunteer Registration Forms, Participant Waivers & Agreements (events involving Minors under 18)	Permanent	
• Workers' Comp Claims Files	7 years after claim closure	Destroy

## ***PAYROLL***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Annual Payment Records (W2, Alpha lists, 1099's, employee transactions lists)	7 years	Destroy
• Current Employee File Folders (W4's, PAF's, etc.)	5 years after termination	Destroy
• Employer Copy of IRS form W-2	10 years	Destroy
• Imputed Income Records (auto usage, etc.)	7 years	Destroy
• Information Returns filed with Federal & State Authorities (W-2, 941, 1042S, etc.)	7+ years	Destroy
• Leave Reporting Documents	5 years	Destroy
• Payroll Deduction Authorization Forms (W-4 etc.)	5 years after employment ends	Destroy
• Payroll Vouchers	5 years	Destroy
• Period End Folders (timesheets, SPA forms, etc.)	5 years	Destroy
• Quarterly & Annual Tax Returns	7 years	Destroy
• Record of Payments & Deductions (payroll registers, deductions lists, adjustments)	5 years	Destroy
• Terminated Employee Files	5 years after employment ends	Destroy
• Time Cards, student	5 years after the date student loans are paid	Destroy
• Time Cards, other	5 years	Destroy
• Wage Assignment Orders	5 years after closed	Destroy

***PROCUREMENT***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• 1099s – reports and copies	7 years	Office Retention
• Accounts Payable Vouchers & Attachments	7 years	Destroy
• Approval Signature Forms	Permanent	Office Retention
• Bid Responses	7 years	Destroy
• Bid Waiver & Sole Source Justification	7 years (Attached to ESM 2012-on)	Destroy
• Cancelled Check Copies	Permanent –CD-ROM	Office Retention
• Check/Direct Deposit Registers	1 year	Destroy
• Contracts &Agreements (signed)	7 years after termination ESM and Nolijweb	Destroy
• Control Reports	1 year	Destroy
• Daily Balancing Reports	1 year	Destroy
• Department Procurement Card Logs	7 years	Destroy
• Direct Deposit Reports sent to Bank	Electronic -1 month; Paper – Permanent	Destroy
• Direct Deposit Sign-Up Forms	Permanent	Office Retention
• Employee Reimbursements	7 years	Destroy
• Equipment Warranties	Life of Equipment-Each department must keep their own records	Destroy
• Independent Contractor		



Check List	Permanent-Nolijweb	Office Retention
• Insurance Forms	7 years-Permanent-Nolijweb	Destroy
• Invoices	7 years	Destroy
• Lease Agreements	7 years	Destroy
• Positive Pay File Sent to Bank	1 month	Destroy
• Procurement Card Agreement Forms	Permanent-Electronically	Office Retention
• Procurement Card Audits	Permanent	Office Retention
• Purchase Orders	7 years (ESM and Nolijweb 2012-on)	Destroy
• Requests for Payment	7 years	Destroy
• Vendor Profile Forms	Permanent -Nolijweb	Office Retention
• W-9 Forms	Permanent -Nolijweb	Office Retention

## **TAX**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Assets: Acquisition/Disposition Depreciation Schedules	Life of Asset + 7 years	Destroy
• Escheat Filing	7 years	Destroy
• Excise Tax Returns	7 years	Destroy
• Income Tax Returns (990-T)	7 years	Destroy
• Information Returns (990, 1099, 8282, 90.22., 1042 etc.)	7 years	Destroy
• Other Tax Returns (Aldwyn Lane, Radnor, BPT, etc.)	7 years	Destroy
• Sales Tax Returns (Individual States)	7 years	Destroy

## HUMAN RESOURCES

### *AFFIRMATIVE ACTION/EQUAL OPPORTUNITY*

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Adverse Impact Information	5 years	Destroy
• Complaint Case File	6 years after separation	Destroy
• Documents Supporting Other Academic or Non-Academic Selections Decisions (e.g. promotion, termination, compensation)	5 years from effective date of decision	Destroy
• IPED Forms	3 years	Destroy
• Federal and State Required Statistics & Reports	Permanent	Office Retention
• Names/Demographic Data of Those Interviewed	5 years	Destroy
• Non-Academic Search Materials & Hiring Forms (Adverse impact info., applicant flow cards, search waivers, documentation of hiring decision forms)	5 years from date of appointment	Destroy

### *EMPLOYEE INFORMATION*

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• ADA Accommodation Requests	3 years after separation	Destroy
• Applicant Files (applications, resumes)	5 years from date of hire of successful candidate	Destroy
• Attendance Records	3 years after separation	Destroy
• Employee Personnel Files (application, resume, payroll, appointment/salary forms, medical records, leave of absence, etc.)	6 years after separation	Destroy

• Federal Reporting Requirements: Welfare Benefits & Other Fringe Benefit Plans (i.e. 5500's)	Permanent	Office Retention
• Fingerprint Reports	Permanent	
• FMLA – Leave Notices	6 years after separation	Destroy
• Fringe Benefit Returns	Permanent	Office Retention
• Individual Contracts of Employment	6 years after separation	Destroy
• I-9 Forms (Faculty & Staff)	3 years or 1 year after separation (whichever is later)	Destroy
• Leave Requests	6 years	Destroy
• Occupational Injury or Illness Log	6 years	Destroy
• Occupational Exposure and related Medical Records	30 years beyond length of employment	Destroy
• Performance Appraisals	6 years after separation	Destroy
• Reclassification Requests	6 years after separation	Destroy
• Search Committee Records (incl. applications for employment, resumes, and all applicant search materials)	3 years	Destroy
• Sexual Harassment Complaints, Investigation & Findings	3 years after separation	Destroy
• Union Agreements	Permanent, as long as the Union retains a presence	Office Retention
• Union Grievances	3 years after settlement	Destroy
• Background Checks	6 years after check	Destroy

## ***EMPLOYEE BENEFITS***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Employee Eligibility for Benefits	6 years after death of eligible employee and beneficiary	Destroy
• Employee Personal Information (name, address, SSN, period of employment)	6 years after death of eligible employee and beneficiary	Destroy
• Employee Service Records	6 years after death of eligible employee and beneficiary	Destroy
• Plan Administrator Records	Permanent	Office Retention
• Benefits Paid to Employees or their Beneficiaries	6 years after death of eligible employee and beneficiary	Destroy
• Plan Documents & All Attached Amendments	Permanent	Office Retention
• Plans Filed with the Department of Labor and Internal Revenue Service	Permanent	Office Retention
• Tuition Reimbursement/Remission	6 years after death of eligible employee and beneficiary	Destroy

## **LEGAL**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Consent Orders	Permanent	Office Retention
• Contracts	7 years after expiration or termination	Destroy
• Court Orders	Permanent	Office Retention
• Deposition Transcripts	2 years after final judgment	Destroy
• Discovery Materials	2 years after final judgment	Destroy
• Judgments	Permanent	Office Retention
• Releases	Permanent	Office Retention

- Settlements Permanent Office Retention

## **MISSION AND MINISTRY**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Volunteer Registration Forms, Participant Waivers & Agreements (events <u>not</u> involving Minors under 18)	3 years after event date	Destroy
• Volunteer Registration Forms, Participant Waivers & Agreements (events involving Minors under 18)	Permanently	

## **OPIR**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• CATS electronic files	Permanent	Office Retention
• External Data Requests (electronic submissions)	Permanent	Office Retention
• External Data Requests (paper submissions)	7 years	Destroy
• Focus Group Reports (paper and electronic)	Permanent	Office Retention
• Original Completed Surveys	5 years from date administered	Destroy
• Survey Reports (paper and electronic)	Permanent	Office Retention

## **PATENTS & TRADEMARKS**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Invention Assignment Forms	Permanent	Office Retention
• Licensing Agreements	Permanent	Office Retention

- |   |                                   |                  |
|---|-----------------------------------|------------------|
| • Original Patents, Trademarks, & Related Work Papers | Permanent                         | Office Retention |
| • Royalty Records                                     | Life of Patent or TM plus 6 years | Destroy          |

## **PUBLIC SAFETY**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Accident Reports	5 years after report date	Destroy
• Audio/Video Footage	30 days, unless it relates to an investigation, then 7 years	
• Crime Reports	7 years after report date	Destroy
• Property Damage Reports	5 years after report date	Destroy
• Clery Act Annual Security Reports	7 years after report date	Destroy
• Fingerprint logs	Permanent	
• Statistical Backup for Clery Act Statistics	7 years after report date	Destroy

## **STUDENT LIFE**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Alcohol and Drug Intervention Files	5 years from graduation or date of last attendance	Destroy
• Applications and Interviews associated with various clubs and organizations	2 years	Destroy
• Disciplinary Records		
- Final Sanction is Warning	Until graduation or permanent withdrawal	Destroy*
-Final Sanction is Probation	2 years after graduation permanent withdraw or after completion of sanction, whichever is longer.	Destroy*

-Final Sanction is Suspension	5 years	Office Retention*
-Final Sanction is Expulsion	Permanent	Office Retention*
Law School Disciplinary Records	Permanent	Office Retention*
• Homeland Security Records for International Students	5 years after graduation or date of last attendance	Destroy
• International Student Forms (Visa documentation, I -94s, etc.)	5 years from graduation or date of last attendance	Destroy
• Letters of Recommendation	1 year after graduation or date of last attendance	Destroy
• Orientation Programs	3 years	Archives
• Parent Handbook	5 years	Archives
• Personal Concerns File	5 years after date of incident	Destroy
• Student Disability Records	5 years after graduation or Last date of attendance	Destroy

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\* Information pertaining to Clery Act reporting requirements shall be provided to the Department of Public Safety prior to destruction; Department of Public Safety shall retain such information for seven years from the report date.

• Student Government Records	Permanent	Copy to Archives
• Student Handbook	Until Superseded	Archives
• Student Health Center Treatment Records	7 years after graduation or date of last attendance	Destroy
• Holloway University Counseling Center Treatment Records	4 years after graduation or date of last attendance	Destroy
• Under-represented Scholarship Records	5 years after graduation or date of last attendance	Destroy
• Yearbook	Permanent	Copy to Archives

## **UNIT\***

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Desktop/Laptop (VSB/A&S) centrally stored selected files)	30 days	Destroy
• DHCP / Radius Logs	1 Year	Destroy
• Digital Measures – Activity Insight (faculty report)	Remotely hosted	
• Document Imaging System (Nolij)	30 days	Destroy
• ERP Banner (Student Info System)	Disk – 7 days Tape – 13 months	Destroy
• Emails – Deleted	15 days	
• Emails – Inbox	Indefinite	
• Emails – Junk	30 days	
• Emails – Sent	60 days	
• Health Center Titanium	30 days	Destroy
• MS-SQL Applications	7 days	Destroy
• Academic SharePoint-MS-SQL Applications	7 years	Destroy
• myNova	30 days	Destroy
• NAC Logs	1 Year	Destroy
• Nursing EMS System	7 years	File maintained online per Registrar guidelines
• Online Course Content	Disk - 30 days Tape – 13 months	File maintained online for 7 years from date of course’s last offering.
• OCS Text Messages	30 days	Destroy

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\* In each case, these retention periods shall be suspended in accordance with the procedures set forth on pages 2-3 of this Policy.



• Shared Storage (files & home directories)	30 days from storage	Destroy
• Telephone Call Records	1 Year	Destroy
• Voice Mail Messages	30 days	Destroy
• Web Content (web pages, file systems, databases)	Disk – 30 days	Destroy
• Web Content (Department Sites) (web pages, file systems, databases)	Disk - 30 days	Destroy
• Wildcard Credit Card Slips	7 years	Destroy
• Wildcard Transactions	7 years	Destroy

## **CREDIT CARD PROCESSING AND PCI DSS COMPLIANCE**

<b>Record Type</b>	<b>Office Retention Period</b>	<b>Final Disposition</b>
• Primary Account Number (PAN)	Up to 1 Year	Destroy
• System and Audit Logs	1 Year	Destroy
• Intrusion Detection Logs	1 Year	Destroy
• File Integrity Monitoring Logs	1 Year	Destroy
• Quarterly Vulnerability Scans	3 Years	Destroy
• Annual Penetration Tests	3 Years	Destroy