RECORD RETENTION & DISPOSAL MEMORANDUM

INSTITUTIONAL AND LEGAL RECORDS:

Articles of Incorporation (Charter), Bylaws, Board of Trustee and Committee Minutes, Deeds and Titles…………………..…………………..…………………………Permanently

Licenses, Patents and Trademarks...………………………….While Active (+) 6 Years

Attorney Opinion Letters (re: property).………………….…...…While Active (+) 4 Years

Leases…………………………………………………...………While Active (+) 6 Years

Contracts…………………………………………………...While Active (+) 4 Years

Policy Statements…………………………………………………………………10 Years

Campus Crime Reports (annual)……………………………………………………...4 Years

Campus Crime Reports (interim)…………………………………………………..2 Years

FEDERAL TAX RECORDS:

Forms 990 and 990-T and supporting documentation…………....……..………3 Years
      (6 Years if understatement is more than 25%, indefinitely if fraud is involved)

Exemption Application…………………………………………..………Permanently

Exemption…………………………………………………………..……Permanently

FINANCIAL RECORDS:

Description of accounting system, balance sheet, auditor's reports; capital property records, including inventory, depreciation schedules, mortgage records and property improvement records …………………………………...……..While Active (+) 4 Years

Accounts Receivable, including ledgers, receipts, and uncollected amounts; accounts payable, including purchase requisitions/work orders, invoices, ledgers, payment and disbursement records, expense reports, insurance payments and royalty payments;

Accounts Payable, including purchase requisitions/work orders, invoices, ledgers, payment and disbursement records, expense reports, insurance payments and royalty payments……………………………………………………………..……..4 Years

Collection records and equipment inventory...………………….………......While Active

INSTITUTIONAL PUBLICATIONS:

Alumni newsletters and directories, student newspapers and institutional newspapers/newsletters ……………………….……………………….……..3 Years

Student and employee directories, College press publication lists…………..……..5 Years

Bulletins and course catalogs……………………………………….……10 Years

FACILITIES RECORDS:

Air/Water waste emissions records……………………………………..……3 Years

Hazardous chemical waste records…..…….……………………………………..5 Years

Office layouts, zoning permits, operating permits, maintenance records, motor vehicle records and laboratory practices……………………..……………………….While Active

Building permits…………………………………………………….While Active (+) 1 Year

Building plans and specifications……………….……………..…………….. Permanent

STUDENT RECORDS:

Application Materials For Students Who Are Accepted But Do Not Enter:
Acceptance letters, applications, correspondence and transcript…1 Year after application term

Application Materials For Students Who Enter:
Acceptance Letters, applications, correspondence, entrance exams and placement scores
…………………………………………………….……5 Years after date of attendance
Letters of Recommendation…………………………………………...Until Admitted

Individual Student Records:

Course drop/add slips, pass/fail requests, registration forms, transcript requests…...1 Year

Class schedules, applications for graduation and personal data forms..…………1Year after date of last attendance

Advanced placement, foreign student (I-20) forms, degree audit records and transfer credit evaluations…………………………..……….. 5 Years after date of last attendance

Academic records and date of graduation and degree award…….…………….…Permanent

FERPA requests……………………………………………..Life of requested record (If requested by the student, no records are required)

Financial Aid Records:

Applications and financial aid transcripts……………………………………….5 Years

Financial aid awards, lender's name and address, job placements and repayments ...While

Enrolled (+) 5 Years

Promissory Notes……………………………………………………….…Permanent

PERSONNEL AND EMPLOYMENT RECORDS:

Individual Employee Files:

Employment application or resume, employment history, beneficiary designation forms, emergency contacts, Employment Eligibility Verification (I-9) Forms, medical records, promotions……………………………………..………………...…….While Employed

Attendance records, employee evaluations, disciplinary warning notices, demotions, tenure, transfers, layoffs……………..……………………………………….3 Years

Records regarding terminated employees………….………………………… Indefinitely

Integrated Postsecondary Education Data System (IPEDS) reports…………..…3 Years

OSHA reports and records regarding occupational injury or illnesses……….….5 Years (**NB**: If an employee was exposed to hazardous materials or other toxic substances while at the College, exposure records must be retained for 30 years from the date of the exposure. Medical records of an employee who was exposed must be retained for the duration of employment plus 30 years.)

Employment applications and pre-employment records, including advertisements and announcements of positions, resumes and employment applications and results of

background investigation, including letters of reference, verification of information provided; potential employees on a application, credit reports and criminal record checks……………………………………………………………………………..1 Year

Payroll records including employee's name, home address, occupation, sex, and birth date (if under 19 years old) and, except for administrators or professionals, hour and day when work week begins, total hours worked each work day and work week, total daily or weekly straight-time earnings, regular hourly pay rate for any week in which overtime is worked, total overtime pay for the work week, wage additions or deductions and date of payment and pay period covered, W-2s and w-4s …………………….6 Year
(This time period exceeds Federal and state requirements and may be adjusted.)

Family and Medical Act Leave records including……………………....……….4 Years

EMPLOYEE PENSION PLANS AND OTHER BENEFIT RECORDS, including records of the plans themselves, individual vesting records, contributions, accounts and all other benefits……………………………………………………..…………Indefinitely

(The ADEA requires an employer to retain copies of pension plans, seniority system plans, and merit pay plans (although not the records of the individual participants) for the duration of the plan plus one year. Although ERISA requires that individual employee benefit transaction records be maintained for a minimum of six years, an affected employee can file suit at any time if fraud is involved.)

FACULTY REORDS:

Basic Information: In addition to the personnel/employment records described above, records regarding faculty members generally include reports submitted by the faculty member to the department chair's or dean's office, all correspondence, current resume……………………………………………….………………………While Employed

Student Evaluations of Faculty: Course evaluations……………………………3 Years or until promotion, tenure or contract renewal decision is reached.

Peer Evaluations: Reviews by faculty members, department heads and deans; letters from external and internal reviewers evaluating publications……………………...4 Years from time of action regarding contract renewal, promotion or tenure (indefinitely if result is negative)

*Disciplinary Records***:** Documentation regarding behavior deficiencies, attempts to correct behavior deficiencies (e.g. performance counseling), formal charges of misconduct, transcripts/minutes of disciplinary hearings/appeals, findings and resolution of foregoing…………………………………………………………………….Indefinitely

Records Management at Barnard College

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1. Definition of a 'record'

A 'record' is anything containing information reflecting College educational and business transactions regardless of format (paper, digital, photographic, etc.).

Typical records include official publications, fiscal data, incoming/outgoing correspondence including email, minutes of meetings, reports, and student files.

Not all records must be retained. The list below describes items in a typical office that are _not classified as records_ and therefore do not need to be categorized or maintained. These materials may be destroyed at any time if they are no longer needed by the office holding them. These items will not appear on a 'retention schedule.'

- large quantities of duplicate materials and all duplicates of 'official copies'
- non-Barnard published magazines and newspapers
- published reports produced by other entities
- purchased data from other sources
- blank letterhead or other blank forms
- routing slips or telephone messages
- catalogues, journals, or other printed matter used for informational purposes
- routine letters of transmittal and "for your information" notes
- notices or memoranda that give only 'timely information' such as a change of venue for a meeting.
- notes or working papers once a project is completed, unless they provide more complete information than the final report

'*Permanent' records, also called 'archival records,' are 'records' which have historical, administrative or research value to the College and which we intend to keep indefinitely.*

The Barnard College Archives Office is responsible for ensuring that the College identifies these records and that they are transferred to the College Archives once they become 'inactive.' Examples of archival records include meeting minutes, architectural drawings, organization charts, real estate records, endowment agreements, student theses, selected faculty papers, committee work resulting in College policies, and photographs of events and buildings. The Archives Office assists in the identification and classification of records as archival.

Remember that a lot of material is not a 'record' at all and can be destroyed at any time. Once something is defined as a record it is either 'active' or 'inactive'. All 'active' or 'inactive' records will be listed on a 'retention schedule'. *'Active' records are records that you generally refer to once a month. 'Inactive' records are records that you have not needed for at least one year.* Unless these records have been defined as 'permanent' records they should be destroyed according to the time period shown on the 'retention schedule.' 'Inactive' records should be securely stored until the end of the 'retention period.' However, at the end of the 'retention period' the custodian of the records is responsible of destroying the records.

2. Retention Schedules

A 'retention schedule' is a table describing categories of records, providing a length of time they should be kept and includes instructions for disposition. State or federal law may determine the period that certain records must be kept. The periods of time discussed in this policy are set to comply with federal and state law requirements.

The General Retention Schedule at the end of this policy lists the most common records at the College and provides a retention period along with any special instructions related to disposal. Almost every department or office will have records requiring retention that are NOT on the General Retention Schedule. Records that are not on this schedule should be added on a case by case basis in consultation with the College's Office of General Counsel.

The retention period is a minimum period of time for keeping records. Custodians may hold records longer than the retention period. Custodians are responsible for ensuring storage is secure and under conditions that will preserve the record.

Certain units or offices within the College may find that there are professional standards dictating best practices for records retention. For example the Registrar's Office will adhere to the Family Educational Rights and Privacy Act in determining access to records and the format for keeping records. Student Financial Services will be bound by federal laws related to student financial aid. The General Retention Schedule incorporates the requirements of various laws as they apply to general categories of records.

3. Records Custodians

Everyone who creates records is responsible for managing those records while they are using them. Maintaining records in a safe, secure, and retrievable way is the primary responsibility of the creator while the record is serving its useful purpose. Sometimes the creator of the record will also be the official custodian.

All records of the College have **an official 'custodian.'**

Custodians are expected to:

- Understand the records created within the department, administrative office or unit
- follow this policy to make decisions on retention and disposition of records and provide guidance to others who are involved in preparing records for storage
- Be responsible for ensuring that everyone in the academic department, administrative office, or unit is aware of the records management policy and follows it
- Consult with the on matters related to retention and disposition of records and develops the 'retention schedule' for the records of the academic department, administrative office, or unit

  Financial Records – Asst. Vice President of Finance/Controller
  Academic Dept. Records – Office of the Provost
  Personnel Records – Director of Human Resources

- Establish the level of confidentiality and security appropriate to specific types of records and helps the department or unit maintain and monitor confidentiality and security

4. Official Copies and Duplicates

Most records will eventually have multiple copies in several offices and departments at the College. ***There is only one 'official copy' and the 'custodian' in the office holding the 'official copy' is the 'official custodian' and is responsible for its retention and possible classification as an archival record.*** Copies may be kept as long as they are useful unless the office, department or unit has the 'official copy.' For example, the Institutional Support Office is the 'official custodian' of most grant proposals and technical reports required to be filed with granting agencies. All other copies of a grant proposal or technical report may be destroyed when no longer needed. The Institutional Support Office is responsible for retaining the record for the period required by law or longer if appropriate. Whenever another office is designated as the 'official custodian' of a document, all other offices should consult with the official custodian before destroying records that the custodian is maintaining.

5. Committee Records and Responsibilities of Chairs of Committees

Chairs of all committees are the 'official custodian' of the records related to the committee's work. In general, all policy development, accrediting procedures, academic department curricular change activities, and other similar efforts create records which will be of interest to College Archives and result in 'permanent' records. A copy of such records should be sent to College Archives.

6. Personnel Records

The 'official copy' of all records related to an employee are retained and maintained by the Human Resources Office for non-faculty employees and by the Dean of the Faculty/Provost's Office for faculty members. Departments and offices may keep duplicate copies for convenience, but all material that is kept by the department or office must be copied to the official custodian. See the General Retention Schedule for more information on personnel records.
Students who work in jobs that are NOT part of their educational experience are treated as all other employees for the purposes of record keeping. However, most students are paid to do jobs as a result of a financial aid award or as an integral part of their Barnard education. In that case their employment information is maintained as a student record with the unique obligations associated with student records.

7. Employment Search Committee Records

The basic rule is retention of one year for employment applications. For unsuccessful candidates, keep the file for a minimum of one (1) year, and a maximum of three (3) years from the conclusion of the search. The conclusion of the search is defined as either the position being filled or the search discontinued.

The standards for the disposal of documents are the same regardless of how far the applicant got through the process. The file of someone who was rejected in the first round is kept as long as that of someone who visited campus.

The materials that must be kept in the file are: the cover letter, the cv, and any reference letters.

For the person hired, keep the entire file for the duration of their employment, plus three (3) years.

Please keep in mind that these are considered confidential documents and should be disposed of properly by shredding them at the appropriate time.

8. Academic Department Records

Academic department and program files are critical for documenting the history of the College and should be kept, managed, and archived in a manner consistent with the guidelines provided in this policy. If a current chair maintains the records in his or her own office or on his or her own computer exclusively, the chair is responsible for transferring all electronic and paper records to the departmental assistant when his or her term as chair ends.
Record keeping and management should not begin anew with each chair transition. There should be an ongoing process of records management for the department/program. In the case of confidential materials in the possession of the chair, those should be marked as such (and placed in a sealed envelope if appropriate) and maintained within the department/program files. See the Record Retention & Disposal Memorandum for information about personnel files, and section 11 below. The departmental assistant is a key link in long term maintenance of departmental records. The assistant should be entrusted with knowledge of all departmental records and assist in their maintenance, even if the records are physically kept in the department chair's office.

9. Sponsored Research, Grants, External Support Records

Faculty members and other grantees will have files related to external support. There are special rules that apply to funds received from the Federal government and each grant may have its own set of rules and requirements related to records. All grantees are responsible for helping the College comply with these rules and requirements.

For faculty and others involved in research the Institutional Support Office is the primary source of information and the official custodian for documents and records management. The Institutional Support Office is the official custodian of the grant proposals that are required to be filed and other documents related to the grant. The Controller's Office is the official custodian of the financial records and the granting documents related to the grant. Please refer to the offices of Institutional Support and the Controller for specific guidelines related to grants and sponsored research.

10. Faculty Professional Papers and Records

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

11. Records Destruction

Following a 'retention schedule' that has been worked out, records should be securely maintained for the period of retention either in the office or department where they were created or used. Records that have been identified as 'archival records' must be sent to College Archives for permanent retention. Records that will not be listed on a retention schedule and therefore may be destroyed at any time include:

- material that is not considered a 'record;' (see: Definition of a record)
- duplicates of an 'official copy' which is stored and retained by another office such as personnel records, financial and budget information, external grant funding, copies of information used in an employee search; and
- records that have served their purpose and are no longer needed such as drafts of reports and notes that have been turned into minutes of meetings.

Destruction includes:

- Recycling – generally appropriate for all non-confidential paper documents, including public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts or policies or other memos which are not confidential.

- Shredding – using a cross-cut or strip shredder for all documents that should not be read by others after they are no longer needed or that contain personnel or confidential information. This is essential for any document containing personal information, information that is student protected information under FERPA, health related information, or financial information.

The College contracts with a shredding company called Cintas, Inc. Their bins are located in the Central Receiving Dept. located at A108 Altschul Hall. These bins are available *__only__* for permanent destruction of large volumes of confidential material, as the cost for this service is higher than the cost of disposing of shredded material. You may make arraignments to have a shredding bin delivered to you office by contacting the Purchasing Department at ext. 4-5204.

12. Electronic Records

Many records are created and maintained in an 'electronic' format. These include documents on your computer's hard drive, email and its attachments, and documents that have been scanned and reside on CDs or on other removable storage media. File maintenance of these records requires coordination among the places where they are stored – hard-drives on desk tops, laptops, on shared drives (network systems), and on removable storage media. It is important to remember that desktop applications are designed for communicating information, and transmitting knowledge. They make communicating with others more simple and efficient, but they are not designed for permanent retention of records. Issues of file authentication, version-control, duplication, maintenance, access and permanency are more acute with electronic records.

Any electronic record that needs to be kept for a retention period longer than seven (7) years should be printed and kept in a paper filing system OR maintained in an electronic format and the equipment needed to read or access the information kept and maintained for the same period of time. For retention periods shorter than seven (7) years it is believed that storage on DVD or CD format will be reliable and readable. Any electronic record that merits permanent retention should be maintained electronically and printed and kept in a paper filing system. An electronic file that has permanent value to the College should be printed and transferred to **College Archives**. Records that are maintained only in electronic format should be named and labeled in a manner that is consistent with the paper filing system used in the office for ease of coordination and cross-referencing.

13. Colleague and Other Data Systems

The Datatel, Inc's Colleague system is the College's largest electronic data system. College-wide electronic data systems generally contain information that if lost, corrupted or disclosed without authorization could result in the impairment of business functions at the College. In addition some data on these systems contain private data that if lost, corrupted or disclosed without authorization could also result in claims involving invasion of personal privacy, loss of reputation or creditability, and violation of federal or state laws or regulations or College contracts. These systems are generally only made available to approved users. Examples include the Colleague financial system, admissions records, financial aid records, the registrar's records and alumnae/donor biographical and gift data.

All data in the Datatel Colleague system or any other data system will have an individual responsible for the integrity of the data in the system. That person is responsible for verifying that electronic data and the record created from the data have not been inappropriately altered, in other words can verify that it is authentic. He or she is responsible for ensuring adherence to policies about access, loss prevention and security to prevent corruption.

The Datatel Colleague data system is backed-up by the College in order to ensure business continuation in the event of a disaster or crisis. Therefore, individual offices only need to retain their copies of Colleague information while they are useful. One notable exception involves special compilations of data that offices or departments may create using data from Colleague. Because of the way data is preserved or changed over time, it may not always be possible to re-create a compilation of data in the future. Any report created from special compilations, as opposed to merely printing data from the system, should be retained by the office or department creating it as the 'official copy.'
 Some administrative offices, academic departments, or units have created electronic data systems by purchasing software to help manage a specific database for research or other purposes. If it is determined that the records created by that database should be maintained for a specific period or should be permanently retained, the maintenance of the software license and the availability of it can be very important. Before purchasing or using specialized software for these purposes, the official custodian should discuss the purchase and any agreement needed about backing-up the data system with BCIT.

All College faculty, staff and students entrusted with electronic data must adhere to these practices:

- Keep data secure against unauthorized creation, updating, processing, outputting and distribution;

- Appropriately secure data and keep it inaccessible to non-approved users when not in use;

- Use, retain, and dispose of data consistent with this policy; Develop policies related to appropriate and frequent back-up of data systems and their storage in locations that will keep them available in the event of a disaster affecting the original data system;

- When creating reports from data bases, maintaining the same level of confidentiality in the report as exists for protection of the original data.

- Reports containing private or confidential data should be disposed of properly which means shredding all paper copies and erasing hard drives and disks so that the data are not retrievable. Consultation with BCIT staff on how to properly erase hard drives is vital before computers are transferred to other users or discarded.

14. Electronic Mail

Electronic mail should be treated like any other electronic record. Mail that has information that should be retained according to a 'retention schedule' should be

printed and filed as would any other paper record. Even though Email is backed-up centrally for business continuity purposes, it is not kept as a system of record. Each email user is responsible for retaining email containing important information. The "files" embedded in your account are NOT permanent storage and should not be used for permanent or long-term storage purposes.

Finally, saving email using the 'save as' function saves the content as a file but does not save the embedded data in a regular email that gives the properties of the message, such as the identity of the sender's computer, or the route the message took before arriving in your mail box. Saving email as archived mail does preserve these properties and may be important if there is ever a dispute about the origin of the email. It is like saving the envelope that comes with a letter via the postal service. Therefore, email correspondence related to contracting and other activities in which verification of the sender is important should be archived as email for the retention period if possible.

15. College Archives Storage

Using the records retention schedule developed for each office, the records custodian and the College Archivist should discuss what records may be transferred to the College Archives for permanent retention. If certain records do not fall under the retention schedule, the records custodian and College Archivist should discuss access and disposition ***before*** material is sent to the College Archives.

16. Records Related to Web sites

Because Web sites have replaced many publications they are a significant archival record of the College and its operation. Web masters and others creating Web page content should capture copies of their Web site's content as e-files on CD or DVD and send them to College Archives for permanent retention. The College currently lacks space to retain archived copies on its servers and Web sites are not routinely backed-up. If a Web site is changed without preserving the original content it cannot be retrieved from the College servers.

17. Legal Claims – Litigation Holds

If a legal claim is reasonably anticipated or is filed, or a lawsuit begun, the affected offices should immediately contact the office of the General Counsel. The General Counsel's office will issue instructions to keep all records and data systems until further notice. This instruction overrides all standard and existing practices with respect to record destruction and storage. In some cases the General Counsel's office will ask that all relevant documents be given to that office for maintenance during the duration of the legal matter.

18. Contact Information

Archives
www.barnard.edu/archives
(212) 854-4079
(212) 854-7430 fax
archives@barnard.edu

Financial Records
Controller's Office
13 Milbank Hall
(212) 854-2010

Academic Department Records
Office of the Provost
110 Milbank Hall
(212) 854-2708

Personnel Records
Human Resources
6 Milbank Hall
(212) 854-2551

Student Payroll Records
Career Development
Elliott Hall (2nd Floor)
(212) 854-2033

Grant Proposals & Reports
Institutional Support Office
224 Milbank Hall
(212) 854-2955

Shredding Services
Purchasing Department
A114 Altschul Hall
(212) 854-5204