

TRINITY INTERNATIONAL UNIVERSITY

TIU POLICY: Record Retention Policy
TIU POLICY #: P-200
STATUS: Approved, October 2009
Updated, July 2017

I. PURPOSE:

The purposes of this policy are to:

1. Ensure that necessary records and documents are adequately protected and maintained;
2. Ensure that records that are either no longer needed or are of no value are discarded at the appropriate time;
3. Preserve Trinity International University (University) history.

II. SCOPE:

This policy applies to all employees of the University for the maintenance of records that are made or received in the transaction of University business.

All formats of records are applicable, including paper, electronic, or microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), and other more traditional media. The University encourages record retention in an electronic format whenever possible. Individuals responsible for the retention of records are also responsible for the destruction of records following the retention period. Records must be destroyed by shredding or other means to ensure that all sensitive or confidential material can no longer be read or interpreted.

III. POLICY:

A. Definitions

The term "university record" means any record that is created, received, maintained or stored electronically or in paper form within the University. Any communication that is stored on a fixed medium that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the office is a record and must be retained in accordance with this policy.

Examples include, but are not limited to:

1. Electronic mail (e-mail);
2. Word processing documents and spreadsheets;
3. Databases;
4. Paper-based files (student records, University memos, etc.).

The term "legal custodian" refers to the originator or creator of a university record if that person is a University employee; otherwise, it is the University employee to whom the message is addressed or to whom the university record is sent. If the record is transferred by agreement or policy to another person for archival purposes, that person becomes the legal custodian.

"Official" records retention and disposition schedules are the general and departmental program schedules that have been approved by the University and/or required by law.

B. General Requirements

Maintenance and disposal of electronic records is the responsibility of the legal custodian and must be in accordance with guidelines established in the retention and disposition schedule. Failure to properly maintain electronic records may expose the University and individuals to legal risks. The department head of an office having public records is responsible for ensuring compliance with this policy. The department head is responsible for contacting Information Technology (IT) to arrange for the transfer of the electronic records to the new custodian before the accounts are scheduled to be deleted.

C. Electronic Mail

Work-related e-mail is a University record and must be treated as such. Each e-mail user must take responsibility for sorting out personal messages from work-related messages and retaining University records as directed in official records retention and disposition schedules. E-mail that does not meet the definition of a public record, e.g., personal e-mail, or junk e-mail, should be deleted immediately from the system. The University e-mail servers are not intended for long-term record retention. E-mail messages and any associated attachment(s) with retention periods greater than three (3) years are to be printed and filed in similar fashion to paper records. It is important to note that the e-mail message should be kept with the attachment(s). The printed copy of the e-mail must contain the following header information:

1. Who sent the message;
2. Who the message was sent to;
3. Date and time the message was sent;
4. Subject of the message.

When e-mail is used as a transport mechanism for other record types, it is possible, based on the content, for the retention and disposition periods of the e-mail and the transported record(s) to differ. In this case, the longest retention period shall apply.

Many E-mails are considered "transient." Transient e-mail has a short retention period: maintain until no longer of administrative value. Transient material is defined as all informal and/or temporary messages (including, but not limited to, e-mail and voice mail) and all notes and all drafts used in the production of records by any University employee. Transient material also includes anonymous, unsigned and/or unsolicited written or electronic materials, including, but not limited to, anonymous student complaints, anonymous writings from individuals inside or outside the institution, and voice mail messages. Network accounts and associated email and files will be purged 45 days after employment termination.

D. Instant Messaging

The University does support the use of Instant Messaging (IM) for University business.

E. IT Backup Files

IT performs backups on a regular schedule of the e-mail and electronic files stored on central servers for disaster recovery. These backups are to be used for system restoration purposes only. The IT system administrator is not the legal custodian of messages or records which may be included in such backups.

F. Litigation Holds

When litigation against the University or its employees is filed or threatened, the law imposes a duty upon the University to preserve all documents and records that pertain to the issue. 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 cleared by University counsel. E-mail and computer accounts of separated employees that have been placed on a litigation hold by University counsel will be maintained by IT until the hold is released. No employee who has been notified of a litigation hold may alter or delete an electronic record that falls within the scope of that hold. Violation of the hold may subject the individual to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

G. Failure to Comply

Failure to comply with this policy and associated guidelines and procedures may result in disciplinary action and penalties applicable by law.

H. Retention Schedule

Business Office and Human Resources Documents (as recommended by the National Council of Nonprofit Associations):

Retain Permanently

Audit Reports

Checks (for important payments and purchases)

Correspondence (legal and important matters)

Deed, mortgages and bills of sale

Depreciation Schedules

Endowed Contributions Support

FISAP's

Insurance records, current accident reports, claims, policies, etc.

Minute books, bylaws and charter

Patents and related papers

Retirement and pension records

Tax returns and worksheets

Trademark registrations and copyrights

Trusts (Agreement, tax returns and correspondence)

Year End Financial Statements

Retain for 7 Years

Accounts payable ledgers and schedules
Annuity (gift) Contracts (7 years after expiration/death of annuitant)
Checks (excluding important payments and purchases)
Contracts, notes and leases (7 years after expiration)
Expenses Analyses/expense distribution schedules
Fixed Asset Backup (7 years after disposal)
Inventories of products, materials and supplies
Investment Statements
Invoices (to the University from vendors and from the University to customers)
Journal entries/backup
Payroll checks
Payroll records and summaries
Personnel files (terminated employees)
Timesheets
Trusts (investment statements)
Withholding tax statements

Retain for 3 Years

Bank reconciliations
Bank statements
Campus-based Title IV Programs, 3 years after award year (PELL, SEOG, FWSP, etc.)
Deposit Tie-Out sheets (including copies of deposit slips)
Employment applications
Insurance Policies (expired)
Internal audit reports
Perkins repayment records (3 years after loan is assigned, cancelled or paid in full)

Retain for 2 Years

Correspondence (with customers, vendors and general)

Student Financial Services Office (as recommended by the Department of Education):

Retain Permanently

Student accounting files, unpaid

Retain for 3 Years

FISAP (including supporting records)
Financial aid files
Student accounting files (3 years after paid in full)
Student account files at collections (3 years after paid in full)

Admissions and Registrar Office (as recommended by the American Association of Collegiate Registrars and Admissions Officers):

Retain Permanently

Catalogs
Change of grade forms
Commencement programs
Degree statistics
Enrollment statistics
FERPA requests
Grade rosters prior to web grade entry
Grade statistics
Graduation lists
Race/ethnicity statistics
Schedule of classes prior to CARS
Student academic records prior to CARS

Retain for 5 Years after Graduation or Last Attendance

Academic action authorizations
Acceptance letters
Advancement placement records
Applications for admissions or readmission
Credit by examination reports/scores
Curriculum change authorizations
Degree audit records
Entrance examination reports/test scores
Graduation authorizations
Name change authorizations
Placement test records/scores
Student correspondence
Transcripts from other schools
Transfer credit evaluations
Veterans Administration
Waivers and Releases for off campus events
Withdrawal authorizations

Retain for 1 Year

Applications for graduation
Changes of course
Credit/no credit approvals
Enrollment verifications
Personal data information forms
Registration forms
Transcript requests

Retain Until Admission

Admissions recommendations