



Policy: NPRC-1805: Records Retention
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Subject: Records Retention

1. PURPOSE

- 1.1 This policy provides for the systematic review, retention, storage and destruction of documents received or created in the transaction of business by Northern Pennsylvania Regional College (hereinafter “NPRC” or the “College”) and is designed to ensure compliance with federal and state laws and regulation, to eliminate accidental or innocent destruction of records, and to facilitate college operations by promoting efficiency and reducing unnecessary storage of documents. The College retains and preserves vital records of its business and operations to provide a historical record, to ensure current and future operations, and to comply with legal obligations.

2. SCOPE AND APPLICABILITY

- 2.1 This policy applies to all records, both paper and electronic, of the College and to all employees of Northern Pennsylvania Regional College.

3. REFERENCES

- 3.1 INDX-0010 Master Policy Index
- 3.2 NPRC-5010 Security of Information Technology
- 3.3 All applicable Pennsylvania Records Retention policies
(https://www.oa.pa.gov/Policies/md/Documents/210_5.pdf)
- 3.4 All applicable Federal Records Retention policies

4. DEFINITIONS

- 4.1 **Active Records** are records that are generally referred to once per month or that are needed to support the current business activity of a College office or department.
- 4.2 **Disposition of Records** is the terminal treatment of records, either through destruction, imaging, or other permanent storage.
- 4.3 **Electronic Documents** are documents created as or converted to an electronic image.
- 4.4 **Inactive Records** are records that have not been referred to or needed for at least one year and for which the active period has passed.
- 4.5 **Litigation Hold** is a communication issued as the result of current or anticipated litigation, audit, government investigation or other similar matter that suspends the normal process regarding the retention and disposition of College records.

- 4.6 **Permanent Records**, also known as Archival Records, have historical, administrative, or research value to the College, and are kept by the College indefinitely.
- 4.7 A **Record** is anything containing information reflecting college educational and business transactions regardless of format (paper, digital, photographic, recordings, etc.). Typical records include official publications, fiscal data, incoming/outgoing correspondence including email, meeting minutes, reports, personnel files and student files.
- 4.8 **Records Custodians** are individuals who have supervisory authority over a particular function or business practice, and, in that capacity, have responsibility for ensuring effective implementation of the terms, conditions, and/or guidelines associated with this policy.
- 4.9 **Records Destruction** is the physical or electronic destruction of a record after it has become obsolete or otherwise in accordance with this policy.
- 4.10 The **Retention Schedule Procedure** is an internal document 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 of time that certain records must be kept. The General Records Retention Schedule lists the most common records at the College and provides a retention period along with any special instructions related to disposal.
- 4.11 **The Retention Period** is the minimum required length of time for which a college office or department is responsible for maintaining records. Custodians may hold records longer than the retention period if feasible and space allows.

5. POLICY

- 5.1 It is the policy of Northern Pennsylvania Regional College to ensure that its records are preserved to provide documentation of the college's history, and to be retained for periods of time necessary to satisfy the college's business and legal obligations. The records will be disposed of in accordance with an established records retention and disposition schedule. Certain records are permanent and may never be destroyed.
- 5.2 E-mail sent or received over the College's computer system shall constitute a form of College records. While not all e-mails are business records, all college e-mails are property of the College and are subject to discovery in the event of litigation against the College or any of its employees or students. As such, the administration has the ability and right to view the e-mail of all members of the college community. (For more information, please reference NPRC-5010 Security of Information Technology).
- 5.3 Where the College has actual notice of litigation or of a government investigation or audit or has reason to believe that such events are likely to occur, it has the obligation to take steps to place a Litigation Hold on documents that might be implicated in such litigation or investigation. The College will take steps to preserve all files and records that may contain documents or e-mails and will notify members of the College community to preserve such documents indefinitely. If an employee receives such a preservation notice, it does not necessarily mean that the employee is involved in the

litigation or investigation. Rather, it means that the evidence that the College is required to preserve may be in the employee's possession or control, and that the employee has an obligation to preserve such information effective immediately. In the event of a Litigation Hold, all policies for the disposition of relevant documents will be suspended until the investigation or litigation is concluded.

5.4 Accessibility and Safekeeping of Records.

- 5.4.1 Records, especially financial records, must be easily retrievable for examination by authorized individuals, including auditors. Access to electronic records is subject to college rules regarding information security. Records Custodians should work with the IT department to ensure that electronic documents are maintained in a format that preserves accessibility.
- 5.4.2 The Records Custodian is responsible for ensuring that active and inactive records are secured in a way to provide appropriate confidentiality and protection from unauthorized inspection, theft, and/or physical damage.

5.5 Disposition of Records.

- 5.5.1 The Records Custodian is responsible for periodically determining which records in their particular office or department have reached the end of their retention period and should be destroyed or transferred to storage.
 - 5.5.2 The Records Custodian should consult with the Director of Information Technology regarding the destruction of electronic documents. (For more information, please refer to NPRC-5010 Security of Information Technology, 4.23 Data/Information Assets).
 - 5.5.3 Non-confidential paper records may be placed in containers for recycling. Confidential paper records must be shredded, or other arrangements must be made for the documents to be destroyed.
 - 5.5.4 The supervisor of the designated Records Custodian is required to sign-off on the transfer of any documents to storage or prior to the destruction of any documents.
- 5.6 When there is a doubt about whether a record may be destroyed, the Records Custodian shall review the retention schedule or consult with the responsible administrator and/or the custodian of the official copy of the record if one exists.
- 5.7 The Records Custodian's supervisor should provide guidance regarding any federal or state rules when developing a retention schedule for records not mentioned here.
- 5.8 The President or his/her designee is responsible for notifying all relevant members of the college community when a litigation hold is being implemented and, in consultation with appropriate college officials, determine the scope of the hold, when the hold is no longer required and will communicate such determinations to the relevant members of the college community.
- 5.9 Following the established retention schedule, active records must be securely maintained for the period of retention by the office where they are created or used.

Inactive records defined as permanent or archival shall be stored in a designated storage area.

5.10 Destruction of records shall include:

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

5.10.2 Cross-Cut Shredding is required for all documents that should not be read by others after they are no longer needed or that contain personnel or confidential information. Shredding is essential for any document containing personally identifying information, information that is student-protected under FERPA, health related or financial information.

5.11 Personnel Records

5.11.1 The “official copy” of all records related to an employee is retained and maintained by the Human Resources Office, with one exception: The official copy of all records pertaining to faculty promotion, tenure and evaluation are retained and maintained by the President’s Office.

5.11.2 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 Northern Pennsylvania Regional College education. In that case, their employment information is maintained as a student record with the unique obligations associated with student records.

5.12 Employment Screening Committee Records

5.12.1 At the end of a search, the chair of a search committee should collect from each member of the committee all files, notes, applications, recommendations, and other material related to that search. This material should be reduced to one “official copy” of each record with the rest destroyed. All e-mail and other electronic records should be printed and kept with other print documents and the e-copy deleted from the e-mail system. All search committee members should delete all electronic files related to the search from their computers, e-mail programs, and hard drives. The chair of the search committee will turn over the “official copy” of records to the Human Resources department for retention.

5.13 Records Related to Web Sites

5.13.1 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 electronic files and archive them for permanent retention.

5.14 Electronic File Storage

- 5.14.1 Northern Pennsylvania Regional College shall strive to maintain systems and data operations to allow for access to the maximum extent possible.
 - 5.14.2 The College performs periodic full and incremental backups of its shared file storage systems on a schedule that enables recovery from hardware failure.
 - 5.14.3 Data restoration operations shall only be performed when cabinet-level college management deems such operations necessary. A cabinet-level college administrator and the Director of Information Technology must concur that a data restoration from backup is the best option before such operations may commence.
- 5.15 Not all records must be retained. The following describes examples of items that are not typically classified as “records” and therefore do not need to be categorized or maintained. The materials will not appear on a retention schedule and may be destroyed at any time if they are no longer needed by the unit, division, department, or office holding them:
- 5.15.1 Large quantities of duplicate materials and all duplicates of “official records”;
 - 5.15.2 Magazines and newspapers not published by the College;
 - 5.15.3 Published reports produced by other entities;
 - 5.15.4 Purchased data from other sources;
 - 5.15.5 Catalogs, journals or other printed material created by other entities used for informational purposes; and
 - 5.15.6 Notes or working papers once a project is complete, unless they provide more complete information than the final report.
- 5.16 Faculty and staff are not obligated to retain all e-mails indefinitely; such a policy would impose an impossible burden both on the college community and the College’s computer network. Individual employees are expected to exercise judgment regarding the content and purpose of the e-mail in determining whether it needs to be retained as a College record, and if so, the length of the retention.
- 5.16.1 E-mails can be retained in the following ways:
 - 5.16.1.1.1 Printed out and saved as paper documents in a file;
 - 5.16.1.1.2 Saved into electronic archive folders; or
 - 5.16.1.1.3 Saved on removable storage devices.
 - 5.16.2 Regardless of the format in which the e-mails are saved, the Records Custodian, as defined in the Records Retention Procedure, for each office or department, as outlined below, has an obligation to preserve and safeguard the information in the e-mail as if it were a paper document. Once the e-mail is saved in another format, however, there is no obligation additionally to retain the e-mail in an active e-mail folder.
- 5.17 Unless a record, either active or inactive, has been defined as permanent or archival, such record shall be destroyed according to the time period listed on the applicable

retention schedule. All records shall be appropriately stored and secured until the end of the retention period.

- 5.17.1 A records retention schedule shall be developed with an administrative procedure that lists the most common records at the College and shall provide a retention period and any special instructions related to disposal. Every office or department will have records requiring retention that may not be found on the records retention schedule. Such records must be added on a case-by-case basis as needed in the discretion of the Director of Information Technology.

6. RESPONSIBILITIES AND TIMELINES

- 6.1 A position within each office, department, division and/or administrative unit shall be designated as “Records Custodian” by the responsible administrator. The duties associated with this responsibility shall be included in the job description of the designated position. The responsible administrator will ensure that the Records Custodian understands and is following the records retention requirements applicable to that particular unit. The Records Custodian is expected to:
 - 6.1.1 Oversee day-to-day transactions pertaining to the unit’s records-related functions and shall manage the maintenance, storage, and disposition of such records;
 - 6.1.2 Understand the records created within the unit and to follow all applicable laws, policies, rules, regulations and/or guidelines in making decisions on retention and disposition of records;
 - 6.1.3 Ensure that active and inactive records are secured in a manner to provide appropriate confidentiality and protection from unauthorized inspection, theft, and/or physical damage; and
 - 6.1.4 Ensure that other employees within the office are aware of and abide by the requirements of this policy.
- 6.2 A records retention procedure shall be developed by the President, or the President’s designee, that lists the most common records at the College and shall provide a retention period and any special instructions related to disposal. Every office or department will have records requiring retention that may not be found on the records retention schedule. Such records must be added on a case-by-case basis as needed in the discretion of the Director of Information Technology.

7. REVIEW STATEMENT

- 7.1 This policy shall be reviewed on a regular basis at least once every five years per the Policy Review Schedule established by the President or his designee. A review of the policy may be requested prior to the timeframe outlined by the policy review schedule by any student, faculty, staff, administrator, or board member. Such a request must be submitted in writing to the office of the President and must address specific concerns. Upon receipt of such a request, a complete review of the policy will be

conducted within three months. Upon review, the President or President’s designee may recommend to the Board of Trustees that the policy be amended or repealed.

8. SIGNATURES

Signature on file

_____	_____
Chair, Board of Trustees	Date
<i>Signature on file</i>	

_____	_____
President	Date

Attachments: None
Distribution: Board of Trustees; www.regionalcollegepa.org
Revision Notes: Policy in Origination