



Records and Retention

1. PURPOSE

This policy establishes a systematic review, retention, storage, and destruction of documents received or created in the transaction of business by Northern Pennsylvania Regional College (“NPRC” or the “College”) and is designed to ensure compliance with federal and state laws and regulation while preserving the College’s history.

2. SCOPE AND APPLICABILITY

This policy applies to all employees and respective records, both paper and electronic, including reproductions or any duplications, maintained by the College.

3. REFERENCES

- 3.1 INDX-1310-01: Master Policy Index
- 3.2 CLDR-1310: Policy Review Schedule
- 3.3 INDX-1310-02: Document Naming Key
- 3.4 NPRC-5010: Information Security
- 3.5 STND-5010-01: Information Security Standards
- 3.6 All Applicable Pennsylvania Records Retention Policies
- 3.7 All applicable Federal Records Retention Policies
- 3.8 PROC- 1050-01: Destruction of Records
- 3.9 PROC- 1050-02: Retention of Records
- 3.10 PROC 1050-03: Responding to Litigation, Government Investigation, or Audit Results
- 3.11 SCED-1050: Records Retention Schedule
- 3.12 FORM-1050-01: Certificate of Destruction

4. DEFINITIONS

- 4.1 A record is anything containing information reflecting college transactions regardless of format (paper, digital, photographic, recordings, emails, etc.). Typical records include official publications, fiscal data, incoming/outgoing correspondence including email, meeting minutes, reports, personnel files.

- 4.2 An education record is a record directly related to students and protected by the Family Educational Rights and Privacy Act (FERPA) and are subject to be reviewed by the student, if maintained, such as graded tests, attendance, financial aid documents, and records listed on SCED-1050: Retention Schedule.
- 4.3 Active Records are records that are generally referred to during regular business or that are needed to support the current business activity of a college office or department.
- 4.4 Inactive Records are documents that are not needed to conduct business but must still be retained for a set period of time.
- 4.5 Confidential Records are documents that contain information that should only be shared with specific people or groups.
- 4.6 Permanent Records or Archival Records have historical, administrative, or research value to the College, and are kept by the College indefinitely.
- 4.7 Electronic Documents are documents created as or converted to an electronic image.
- 4.8 Disposition of Records is the terminal treatment of records, either through destruction, imaging, or other permanent storage.
- 4.9 The Retention Period is the required minimum length of time for which a college office or department is responsible for maintaining records.
- 4.10 Records Destruction is the physical or electronic destruction of a record after it has become obsolete or otherwise in accordance with this policy.
- 4.11 Cross-cut shredding is a shredding technique that uses two sets of blades to cut paper into small, confetti-like pieces making it difficult to reconstruct the original document or extract sensitive information.
- 4.12 Permanent Deletion means that data is completely erased and cannot be recovered.
- 4.13 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. The duties associated with this responsibility shall be included in the job description of the designated position.
- 4.14 A Record Identifier is a number designated to a type of record, by division, on the SCED-1050-01: Records Retention Schedule.
- 4.15 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.

5. POLICY

- 5.1 Records will be identified based upon federal and state laws and regulations and institutional discretion.
- 5.2 Records Custodian's supervisor will provide guidance regarding any federal or state rules when developing a retention schedule for records.
- 5.3 The Records Retention Schedule (SCED-1050: Records Retention Schedule) will be maintained listing the most common records at the College and shall provide a retention period and any instruction related to the disposition.
- 5.4 Any record not found on the Records Retention Schedule may be added on a case-by-case basis approved by the RRD committee.
- 5.5 The retention schedule will be reviewed annually and updated with any changes to state or federal laws and regulations.
- 5.6 Records will be accessible for examination by authorized individuals only and in accordance with the appropriate record type procedures and in accordance with NPRC-5010: Information Security and STND-5010-01: Information Security Standards.
- 5.7 Active and Inactive Records are to be secured in a way to provide appropriate confidentiality and protection from unauthorized review, theft, and physical damage.
 - 5.7.1 Active Records must be securely maintained for the period of retention by the office where they are created and used.
 - 5.7.2 Inactive Records must be stored in a designated storage area identified by the Records Custodian.
- 5.8 In accordance with SCED-1050: Records Retention Schedule, disposition of records requires authorization from the Records Custodian and the Records Custodian's supervisor.
- 5.9 Confidential paper records must be cross-cut shredded, or other arrangements must be made for the documents to be destroyed.
- 5.10 Non-confidential paper records that include, but are not limited to, public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts of policies, or other memoranda, may be placed in containers for recycling.
- 5.11 If there is any doubt or questions regarding the disposition of a record, the Records Custodian must review the retention schedule and consult with the administrator responsible or the custodian of the official copy of the record.
- 5.12 The President or 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.
- 5.13 In the event of a litigation, government investigation, or audit results, PROC-1050-03: Responding to Litigation, Government Investigation, or Audit Results will be followed.
- 5.14 The Right to Know officer will consult the RRD chair for access to requested documents.
- 5.15 Failure to follow this policy may result in possible civil or criminal sanction against the College, as well as internal disciplinary action.

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 administrator responsible. The RRD committee and President’s Council will ensure that the Records Custodian understands and is following the records retention requirements applicable to that particular department. The Records Custodian is expected to:
- 6.1.1 Oversee day-to-day transactions pertaining to the department’s record-related functions and shall manage the maintenance, storage, and disposition of such records.
 - 6.1.2 Understand the records created within the department and 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;
 - 6.1.4 Identify reproductions of duplications of records that may be in another area of their department, or within another department of the College.
 - 6.1.5 Ensure that other employees within the office are aware of and abide by the requirements of this policy; and
 - 6.1.6 Identify and report changes in federal and state laws and regulations to the RRD committee chair.
- 6.2 The Registrar will fill the role of committee chair, until otherwise changed.
- 6.3 The RRD committee chair and supervising vice president are responsible for the execution of this policy.

7. REVIEW STATEMENT

Review of this policy will occur in alignment with CLDR-1310: Policy Review Schedule.

8. SIGNATURES

<i>Signature on file</i>	<i>3/14/25</i>
_____ Chairperson, Board of Trustees	_____ Date
<i>Signature on file</i>	<i>3/14/25</i>
_____ President	_____ Date

Revision Notes: Policy in Revision