

# **LEHIGH UNIVERSITY RECORDS MANAGEMENT AND RETENTION POLICY**

**Adopted 2010, approved by the Board of Trustees**

## **I. PURPOSE**

University records are a valuable asset. The University is committed to the effective management and retention of its records as necessary to fulfill its educational mission, comply with legal requirements, and preserve its history. The purpose of this policy is to assist the University in its efforts to:

- Comply with legal, contractual, and accreditation requirements for the retention, privacy, and security of records;
- Retain records for which there is continuing administrative or operational need and establish mechanisms for ensuring the authenticity, reliability, and usability of such records (including as needed for business continuity/disaster recovery);
- Destroy records no longer necessary to the operation of the University in order to optimize the use of space and minimize the costs of record storage; and
- Retain records that are valuable to the preservation of the University's history.

## **II. DEFINITIONS**

### **Electronic Record:**

Any University Record that is created, received, maintained and/or stored on University local workstations or central servers, regardless of the application used to create that University Record, as well as any University Record maintained in any other non-paper format. Examples of Electronic Records include, but are not limited to, electronic mail, word processing documents, spreadsheets, databases, videos, photographs and audio recordings.

### **Official Repository:**

The University department, office, center, or unit designated as having responsibility for retention and timely destruction of the University Record subject to a Required Retention Period.

### **Paper Record:**

Any University Record maintained in a hard copy paper format, regardless of whether it was originally created on paper or as an Electronic Record.

### **Preservation Notice:**

If the University becomes involved in a legal dispute, a preservation notice may be issued by the Office of the General Counsel. A preservation notice compels the University to retain any and all records that may be relevant to a lawsuit that has been filed or one that is reasonably anticipated. Sometimes referred to as a "litigation hold," a preservation notice suspends normal record retention periods and requires that records be maintained and not tampered with from that point forward until the notice is removed.

### **Required Retention Period:**

The retention period set forth in the University's Records Retention Schedule.

**University Record:**

Electronic and Paper Records, collectively.

**III. RECORD RETENTION: LOCATION (OFFICIAL REPOSITORY) AND RETENTION PERIODS**

The Appendix to this Records Management and Retention Policy lists the general types of University Records, the Official Repository of such records within the University, and the Required Retention Period for such records maintained by an Official Repository. Once the retention period expires, the covered record maintained by the Official Repository should be properly destroyed. The Official Repository may retain a University Record beyond the Required Retention Period if good cause exists for doing so. In that situation, the Official Repository will ensure that the University Record is destroyed in accordance with this policy once the need for its extended retention ends.

Federal and state laws, regulations and best practices require that the University adhere to certain record retention requirements and periods of retention. The appropriate time periods for record retention are record-specific and are subject to ongoing modification from time to time by government statute or regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the retention period for the applicable record stated in the Appendix to this Policy. A temporary modification of a Required Retention Period or suspension of record destruction required for any of these reasons will be accomplished by a notice sent out to affected University departments by the Office of the General Counsel, the Office of Internal Audit, the Controller's Office, or the Office of Research and Sponsored Programs. A permanent modification of a retention period will be accomplished by amending Appendix A.

No list of University Records can be exhaustive. Questions regarding the retention period for any specific University Record or category of records not included in the Appendix to this Policy should be directed to the Office of the General Counsel.

**IV. DEPARTMENTAL RECORDS MANAGEMENT**

Each University department should designate a records manager who is familiar with this Records Management and Retention Policy and who will assume responsibility for:

- Restricting access to confidential records and information to those who need access to such records for the appropriate performance of their job responsibilities;
- Informing and educating staff within the department on proper record management practices; and
- Coordinating the destruction of records as provided by this Policy.

The General Counsel's Office is available to advise and assist individual departments to implement these requirements.

## **V. SAFEGUARDING RECORDS CONTAINING CONFIDENTIAL INFORMATION**

Many records subject to record retention requirements contain confidential information (non-public information including, but not limited to, name, address, social security number, bank account numbers, financial or financial aid information, student identification numbers, medical information, employment information, etc.). Such records are protected by federal and state statutes including the Family Educational Rights and Privacy Act (FERPA), the Gramm-Leach-Bliley (GLB) Act, and the Health Insurance Portability and Accountability Act (HIPAA). Any record that contains confidential information should also be treated in accordance with University and departmental data security policies and procedures.

The records manager of a department should ensure that active and inactive financial records (paper and electronic) are stored in a secure location. The storage location must provide appropriate confidentiality and protection from unauthorized inspection, theft, and physical damage due to a fire, water, natural disaster. The records manager should use sound judgment in restricting access to financial records, giving consideration to the degree of confidentiality warranted for such records.

## **VII. ELECTRONICALLY STORED INFORMATION**

The ease with which electronically stored information may be created and the number of places where such information may be stored requires that the University manage its electronically stored information effectively, efficiently, and consistent with its legal obligations. Unless otherwise specifically set forth in this Policy, maintenance and disposition of Electronic Records shall proceed on the same basis as Paper Records.

## **VIII. DISPOSAL AND DESTRUCTION OF RECORDS**

If it is determined that, consistent with this Records Management and Retention Policy, it is appropriate to dispose of any records, they can be destroyed in one of the following ways:

- Recycle paper records that do not contain confidential information;
- Shred confidential paper records;
- Erase or destroy electronically stored information (Library and Technology Services (LTS) can assist in effectively disposing of this data); or
- Physically destroy audio, video, or film recordings

University departments that are not Official Repositories of a University Record and that retain duplicate or multiple copies of such University Records should dispose of them when there is no longer an administrative or operational need for such records.

**APPENDIX A****O = As Needed for Operations**

Type of Record	Official Repository	Duration
<b>ALUMNI</b>		
Alumni Association Board of Directors (Membership, Minutes)	Alumni Association	Permanent
Alumni Association Contracts	Alumni Association	Length of contract + 7 years
Alumni Publications (e.g. Alumni Bulletin)	Alumni Association	Permanent
Alumni Records	Alumni Association	Permanent
Class Yearbooks	Alumni Association	Permanent
Governance Records (Articles of Incorporation, Bylaws)	Alumni Association	Permanent
<b>ATHLETICS</b>		
Coaching Staff Personnel Records	Athletics	6 years from last date of employment
Facility Operations Records	Athletics	O
NCAA Eligibility and Compliance Records	Athletics	6 years from graduation or last date of attendance, whichever is later
Operations Records	Athletics	O
Sports Medicine Records	Athletics	6 years from graduation or last date of attendance, whichever is later
Student Athlete Records	Athletics	6 years from graduation or last date of attendance, whichever is later
Summer Camp Records	Athletics	6 years from graduation or last date of attendance, whichever is later
Ticket Records	Athletics	O
<b>AUDIT</b>		
Conflict of Interest Employee Disclosure Forms	Internal Audit	10 years
External Audit Reports	Internal Audit	20 years
Internal Audit Reports	Internal Audit	20 years
<b>BOARD OF TRUSTEES</b>		
Board Meeting Minutes (Board of Trustees, Committees)	Secretary, Bd. of Trustees	Permanent
Governance Records (University Charter, Bylaws)	Secretary, Bd. of Trustees	Permanent
<b>DEVELOPMENT</b>		
Annual Fund Records	Development	Permanent
Call Reports	Development	O
Capital Campaign Records	Development	Permanent
Cash Gift Records	Development	Permanent
Endowment Agreements	Development	Permanent
Planned Gift Agreements	Development	Permanent
Pledges	Development	Permanent
Wills/Bequests	Development	Permanent
<b>ENDOWMENT</b>		
Investment Agreements	Investment Office	Length of Contract + 7 years
Investment Manager Agreements and Records	Investment Office	Length of Contract + 7 years
Investment Office Operations Records	Investment Office	O

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Type of Record	Official Repository	Duration
<b>ENVIRONMENTAL HEALTH AND SAFETY</b>		
Accident Reports	Office of Environmental Health and Safety	5 years
Air Monitoring or Area Sampling	Office of Environmental Health and Safety	Employment + 10 years
Chemical Inventories and Lists	Office of Environmental Health and Safety	5 years
Fire Incident Reports	Office of Environmental Health and Safety	5 years
Fire Protection Systems Records	Office of Environmental Health and Safety	5 years
Hazardous Material Spill Reports	Office of Environmental Health and Safety	30 years
Hazardous Waste Disposal Manifests and Reports	Office of Environmental Health and Safety	Permanent
Safety Incident Investigation Reports	Office of Environmental Health and Safety	5 years
<b>FACILITIES</b>		
Building/Site Plan Specifications	Facilities Services and Campus Planning	Permanent
Building/Zoning Permits	Facilities Services and Campus Planning	Permanent
Capital Construction Final Payment Records	Facilities Services and Campus Planning	See Accounts Payable Records
Capital Construction Materials and Equipment Info/Correspondence	Facilities Services and Campus Planning	Permanent
Capital Construction Project Contracts	Facilities Services and Campus Planning	Length of Contract + 7 years
Maintenance Records	Facilities Services and Campus Planning	10 years
Operating Permits (e.g., elevators)	Facilities Services and Campus Planning	3 years from expiration
<b>FACULTY</b>		
<b>HIRING</b>		
Academic Search	Office of the Provost	3 years after search
I-9	Office of the Provost	3 years from date of hire or 1 year from last date of employment, whichever is later
<b>PROMOTION and TENURE</b>		
Promotion Reviews	Office of the Provost	6 years after retirement or termination
Tenure Reviews	Office of the Provost	6 years after retirement or termination
<b>FACULTY PERSONNEL FILES</b>		
Tenure/Tenure Track Faculty (Appointment and Reappointment letters, Professional Activity Reports, Travel Requests)	Office of the Provost	6 years after retirement or termination
Other Faculty and Instructional/Research Personnel (e.g. adjunct, visiting, research scientists/engineers)	Office of the Provost	6 years after retirement or termination

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Type of Record	Official Repository	Duration
<b>ACADEMIC ADMINISTRATIVE RECORDS</b>		
Faculty Meeting Minutes, Agendas, etc.	Secretary of the Faculty	O
Faculty Teaching Evaluations	Office of Institutional Research	O or 6 years after retirement or termination, whichever is longer
<b>FINANCE and ADMINISTRATION</b>		
<b>ACCOUNTING and FINANCE RECORDS</b>		
Accounts Payable Records	Controller's Office	6 years
Accounts Receivable Records	Office of the Bursar	6 years
Annual Financial Reports	Controller's Office	Permanent
Banking Statements and Reconciliation Records	Controller's Office	6 years
Capital Equipment Records	Controller's Office	life of asset: records of equipment purchased on federal funds must be retained for 3 years after final disposition
Depreciation Records	Controller's Office	Life of Asset
Indirect Cost Rate Calculations	Research Accounting	6 years
Travel Reimbursements	Controller's Office	6 years
Bond Financing Documents	Office of the Treasurer	Term of Bonds + 7 years
<b>BUDGET RECORDS</b>		
Budget Records	Budget Office	Approved Budget - Permanent Background Documents - 10 years
<b>PAYROLL RECORDS</b>		
Annual Payment Records (W-2)	Payroll Office	5 years
Departmental Time Reports	Payroll Office	5 years
Timesheets (non-exempt, wage employees)	Payroll Office	3 years
I-9s	Payroll Office	3 years after date of hire or 1 year from last date of employment, whichever is later
Payroll Deduction Authorization Forms	Payroll Office	5 years after authorization expires or is superseded
Salary or Current Rate of Pay		
W-4 Forms	Payroll Office	5 years after superseded or employment ends
Wage or Salary Histories	Banner System	
<b>FINANCE and ADMINISTRATION (Continued)</b>		
<b>TAX</b>		
Information Returns (990, 1099, etc)	Controller's Office	Permanent
Payroll Tax Returns (W2, SS, Unemployment)	Controller's Office	6 years
Property Tax Returns	Controller's Office	6 years
Sales Tax Returns	Controller's Office	6 years
Tuition Statements (Form 1098-T)	Office of the Bursar	
Unrelated Business Tax Income (UBTI) Returns	Controller's Office	6 years

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Type of Record	Official Repository	Duration
<b>GOVERNMENT RELATIONS</b>		
External Board Service Records	Government Relations	5 years from the expiration of the commitment to the organization
Federal/State Appropriations Requests	Government Relations	10 years
Government Grant Records (non-research)	Government Relations	3 years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report, as authorized by the Secretary
Lobbying Disclosure Records	Government Relations	Length of Contract + 7 years
Lobbyist Contracts	Government Relations	Length of contract + 7 years
<b>HUMAN RESOURCES</b>		
<b>AFFIRMATIVE ACTION/EQUAL OPPORTUNITY</b>		
AA/EO Statistics and Reports	Office of the Provost	10 years
Affirmative Action Plans	Office of the Provost	Permanent
<b>HIRING</b>		
Hiring (Applications/Resumes)	Human Resources	6 years after retirement or termination
Job Postings/Search	Human Resources	3 years from filling position or terminating search
I-9	Human Resources	3 years after date of hire or 1 year after date of last employment, whichever is later
<b>EMPLOYEE PERSONNEL FILES</b>		
Performance Reviews	Human Resources	3 years
Employee Service Records/Personnel Files	Human Resources	6 years after death of eligible employee and beneficiary
Position Descriptions	Human Resources	6 years after death of eligible employee and beneficiary
Wage Employee Files (authorizations)	Human Resources	O
<b>BENEFITS and PENSION RECORDS</b>		
Beneficiary Designation Records	Human Resources	5 years from payment of benefits in full
Disability and Sick Leave Records	Human Resources	6 years
Employee Assistance Program (EAP)	Human Resources	7 years
Health, Life and Disability Insurance Plan Documents	Human Resources	Permanent
Retirement/Pension Plans	Human Resources	Permanent
<b>LEGAL</b>		
Contracts	Office of the General Counsel	Length of contract + 7 years
Govt. Regulatory Compliance Filings	Office of the General Counsel	Permanent
Litigation Files/Claims	Office of the General Counsel	10 years from termination of litigation or service of subpoena; for claims with no litigation, 3 years or until claimant turns 21 years of age, whichever is later
Opinion Letters	Office of the General Counsel	10 years
Policy Documents	Office of the General Counsel	Permanent

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Type of Record	Official Repository	Duration
<b>POLICE</b>		
Annual Crime Reports and Related Documentation	University Police	7 Years
Accreditation Records	University Police	Permanent
Surveillance Tapes - Audio or Video	University Police	
Dispatch Operator - Audio Tapes	University Police	
Citations	University Police	7 Years
Investigation Records	University Police	7 Years
Officer Personnel Files	University Police	6 years after termination
Prosecutions	University Police	7 Years
<b>PURCHASING</b>		
Contractor Performance Bonds	Purchasing Services	Length of contract + 7 years
Contracts	Purchasing Services	Length of contract + 7 years
Purchase Orders	Purchasing Services	7 years
Requests for Proposals and Responses to RFPs	Purchasing Services	7 years
<b>REAL ESTATE</b>		
Lease Agreements	Office of the Treasurer	7 years after expiration of lease or contract term
Property Deeds	Office of the Treasurer	Permanent
Title Insurance Policies	Office of Risk Management	Permanent
<b>RESEARCH ADMINISTRATION/TECH TRANSFER</b>		
Animal Care and Use Records	Office of Research and Sponsored Programs	3 years after conclusion of research
Corporate Sponsored Research Agreements	Office of Research and Sponsored Programs	Length of contract + 7 years
Grant Proposals, Grant Awards, and Supporting Documentation	Office of Research and Sponsored Programs	3 years after close of grant
Human Subject Records	Office of Research and Sponsored Programs	3 years after conclusion of research
Invention Assignment Forms	Office of Research and Sponsored Programs	Permanent
Licensing Agreements	Office of Research and Sponsored Programs	7 years from expiration or termination of agreement
Research Effort Reporting	Office of Research and Sponsored Programs	3 years after close of grant
<b>PATENTS and TRADEMARKS</b>		
Patents	Office of Research and Sponsored Programs	Permanent
Royalty Records	Office of Research and Sponsored Programs	Life of Technology/Patent or Trademark + 6 years
Trademark Filings	University Relations	Permanent
<b>RISK MANAGEMENT AND INSURANCE</b>		
Certificates of Insurance	Office of Risk Management	6 years after expiration
Incident or Accident Reports	Office of Risk Management	4 years after report date
Indemnification Agreements	Office of Risk Management	Permanent
Insurance Policies	Office of Risk Management	Permanent
Releases and Waivers (Field trips; student activities)	Office of Risk Management	6 years



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Type of Record	Official Repository	Duration
<b>STUDENT RECORDS</b>		
<b>ACADEMIC</b>		
Academic Actions	Office of the Registrar	5 years from graduation or date of last attendance
Change of Grade Requests	Office of the Registrar	Permanent
Class Lists	Office of the Registrar	Permanent
FERPA Requests	Office of the Registrar	To be kept for the life of the student record file
Grade Sheets	Office of the Registrar	Permanent
Graded Assignments (Exams, Papers)	Faculty Member	As required by the appeal process in Student Handbook
Graduation Lists	Office of the Registrar	Permanent
Student Class Schedules	Office of the Registrar	1 year from graduation date or date of last attendance
Transcript Requests	Office of the Registrar	1 year from submission date
Transcripts	Office of the Registrar	Permanent
Transfer Credit Requests	Office of the Registrar	5 years from graduation
Withdrawal/Leave of Absence Authorizations	Office of the Registrar	5 years from last date of attendance
<b>STUDENT RECORDS (Continued)</b>		
<b>ADMISSIONS RECORDS</b>		
Advanced Placement Records	Office of the Registrar	5 years from graduation date or date of last attendance
Applications for Admission (Matriculating Students) and Related Records (High School Transcripts, SAT, Letters of Recommendation, TOEFL, etc.)	Office of the Registrar	Permanent
Applications for Admission/Readmission (Non-matriculating Students) and Related Records (High School Transcripts, etc.)	Office of the Registrar	5 years from graduation date or date of last attendance
International Student Forms (I-20, etc.)	Office of International Students and Scholars	5 years
Monthly Audit	Office of Admissions	O
Program Attendees/Contact Lists	Office of Admissions	O
Student Worker Privacy Statements	Office of Admissions	Term of Student Employment
Various reports (ex. Lists of students by Academic Index, Cohort, Attribute, Region Code, Non-Citizens, Ethnicity, # of Contacts, Alumni Club Code, etc.)	Office of Admissions	O
<b>STUDENT TUITION, BILLING and FINANCIAL AID RECORDS</b>		
Financial Aid Applications	Office of Financial Aid	5 years from graduation date or date of last attendance
Gold Plus Merchant Participation Agreements and Records Bursar	Office of the Bursar	Length of contract + 7 years
Gold Plus User Records	Office of the Bursar	Account close + 5 years
Loan Records	Office of the Bursar	3 years after loan is repaid in full
Other Fees (e.g. room and board, etc.)	Office of the Bursar	5 years from graduation date or date of last attendance
Scholarship Records	Office of Financial Aid	5 years from graduation date or date of last attendance
Tuition Billing and Payment Records	Office of the Bursar	5 years from graduation date or date of last attendance
Tuition Prepayment Agreements	Office of the Bursar	Length of contract + 7 years

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Type of Record	Official Repository	Duration
<b>GENERAL STUDENT RECORDS AND REPORTS</b>		
Commencement Programs		Permanent
Course Catalogs	Office of the Registrar	Permanent
Course Schedules	Office of the Registrar	Permanent
Degree Statistics	Office of the Registrar	Permanent
Grade Statistics	Office of the Registrar	Permanent
Student Disciplinary/Conduct Records	Dean of Students Office	Permanent where penalty is probation, suspension or expulsion (dismissal); otherwise in accordance with the record retention policy of the Office of Student Conduct
Student Employment Records	Department of Hire	5 years from graduation date or date of last attendance
Student Health Care/Medical Records	University Health and Wellness Center	6 years
Tuition and Fee Charges	Office of the Bursar	6 years
<b>UNIVERSITY RELATIONS</b>		
Contracts	University Relations	Length of contract + 7 years
Institutional Publications	University Relations	Permanent
Press Releases	University Relations	Permanent