

LEHIGH UNIVERSITY RECORDS MANAGEMENT AND RETENTION POLICY

Adopted 2010, Revised 2022
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 Records Management and Retention Policy (the “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);
- Retain records that are valuable to the preservation of the University’s history; and
- 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.

II. DEFINITIONS

Disposable Record: A Disposable Record is recorded information in any form that would normally be a Record, except that it serves a temporary useful purpose or no purpose, does not serve to document the University functions, policies, decisions, procedures, operations, or other activities, and is not required by law to be retained by the University. Disposable Records include blank forms, publications and periodicals of general circulation (including newspapers and magazines) and spam or junk mail. In the absence of a litigation hold (see Section VII below), Disposable Records may also include, but are not limited to, duplicates or originals that have not been annotated; preliminary drafts of documents that do not represent significant steps or decisions in the preparation of an official Record; items containing information where the nature, content and/or source of the information is not readily identifiable, and messages or communications containing information that is short-lived or negligible permanent administrative value, including without limitation, telephone message slips, sticky notes and voice mails, as long as such information is not otherwise required to be maintained.

Electronic Record: An Electronic Record is a Record that is created, received, maintained and/or stored on University local workstations (PC, laptop including portable or handheld devices) or central servers, online, on a mainframe, on a computer hard drive, or on any external storage medium (including disks and thumb drives) regardless of the application

used to create that Record, as well as any Record maintained in any other non-paper format. Examples of Electronic Records include, but are not limited to, email, word processing documents, spreadsheets, databases, HTML documents, scanned or imaged documents, 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 Record subject to a Retention Period.

Paper Record: A Paper Record is any Record maintained in a hard copy paper format, regardless of whether it was originally created on paper or as an Electronic Record.

Record: A Record is recorded information in any form (other than a Disposable Record), which is generated or received by or on behalf of the University or University Personnel in their capacity as University Personnel and includes information pertaining to University Activities or University Resources. A record can be the original or official copy of any record/document, in any format. Formats include but are not limited to: paper and electronic.

Retention Period: The Retention Period for a particular Record is the period of time that such Record must be retained by the University in accordance with this Policy. See Appendix A.

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

The Appendix to this Policy lists the general types of Records, the Official Repository of such Records within the University, and the Retention Period for such records maintained by an Official Repository. The Retention Period set forth in Appendix A governs unless superseded by another section of this Policy. The Official Repository may retain a Record beyond the Retention Period if good cause exists for doing so. In that situation, the Official Repository will ensure that the 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, audit requirements of Legal Proceedings (as defined below). Such modifications supersede the Retention Period for the applicable University Record stated in the Appendix to this Policy. A temporary modification of a 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. The Official Repository and the Office of the

General Counsel, acting together, may amend Appendix A from time to time; provided that, any such amendments required by law may be made unilaterally by the Office of the General Counsel, with notice to the Official Repository. Revisions to Appendix A are not required to be made through the process outlined in the University Policy Structure.

If a University contract requires a Record to be retained for a period of time longer than that set forth in Appendix A, the Retention Period will be the time period stated in the contract.

No list of Records can be exhaustive. Questions regarding the Retention Period for any specific Record or category of records not included in the Appendix to this Policy should be directed to the designated records manager (see Section IV). University personnel must promptly contact the Office of the General Counsel if they believe that applicable legal, regulatory and accreditation and other standards require a Retention Period that is longer than the period set forth in Appendix A. Pending resolution of the matter by the Office of the General Counsel, the Record at issue should be retained for the longer period. University personnel who believe that there should be other changes to Appendix A with respect to specific Records are encouraged to contact the Office of the General Counsel.

IV. STORING AND MAINTAINING RECORDS

Records must be retained and maintained in accordance with the following:

- Records must be maintained in accordance with this Policy in a responsible and secure manner utilizing reliable record keeping systems and processes. The storage location must provide appropriate confidentiality and protection from unauthorized inspection, theft, and physical damage due to a fire, water, or natural disaster. The records manager should use sound judgment in restricting access to Records giving consideration to the degree of confidentiality warranted for such Records.
- Records must be easily accessible and retrievable in a timely manner from the Official Repository throughout their Retention Period;
- To the extent not prohibited by law or regulation, a Paper Record may be converted into an Electronic Record. The resulting Electronic Record (aka a “digital surrogate”) may be substituted for the Paper Record; however, creating a digital surrogate does not change the original Retention Period. The Retention Period is counted from the creation or receipt of the original Record, not the date on which the digital surrogate was created. Digital surrogates must clearly and completely represent all of the information in the original Record.

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

- Coordinating the retention and destruction of Records as provided by this Policy and otherwise complying with this Policy;

- 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
- Ensuring that Electronic Records are not rendered unusable because of changing technology or other obsolescence. Electronic Records in formats endangered by technology changes must be transferred to other formats in order to maintain accessibility.

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

V. DISPOSAL AND DESTRUCTION OF RECORDS

If it is determined that, consistent with this 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.

Only the Official Repository of a Record must maintain the Record in accordance with this Policy. Anyone else in possession of copies of such Record should dispose of the copies when there is no longer an administrative or operational need for such Records.

VI. SAFEGUARDING RECORDS CONTAINING CONFIDENTIAL INFORMATION

Many records subject to record retention requirements contain confidential information (possibly 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 may be protected by applicable law, including the Family Educational Rights and Privacy Act (FERPA), the Gramm-Leach-Bliley (GLB) Act, or 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.

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 Record shall proceed on the same basis as Paper Records.

VIII. LITIGATION HOLDS

The Office of the General Counsel will issue a litigation hold, as required, as part of the University's response to actual or potential litigation, subpoenas, administrative proceedings, government investigations or audits, or other legal proceedings (a "Legal Proceeding"). A litigation hold requires the University to retain any and all Records that may be relevant to the Legal Proceeding. In the event a litigation hold is necessary, the Office of the General Counsel will send a preservation notice to specific employees who may have Records containing information that is relevant to the Legal Proceeding. Employees who receive a preservation notice must maintain such Records in accordance with the terms of the notice, and must not alter or delete them. For purposes of a litigation hold, certain Disposable Records must be maintained as though they were Records (see the definition of Disposable Records).

When an employee receives a preservation notice that covers Records within that employee's custody or control, the employee must inform the records manager within the employee's office or department. Disposal of Records subject to the litigation hold must be suspended until further notice from the Office of the General Counsel.

An Electronic Record must be preserved in its original electronic form so that it (and all information contained within it, including metadata) can be retrieved, if necessary, at a later time. It is not sufficient to make a hard copy of the Electronic Record.

University employees must immediately notify the Office of the General Counsel if they become aware that a Legal Proceeding has been initiated or have notice of, should know or reasonably can anticipate further Legal Proceedings.

A litigation hold remains in effect until the Office of the General Counsel formally terminates the litigation hold by written notice. Unless the Office of the General Counsel provides guidance to the contrary, when a litigation hold is terminated, Records previously covered by the litigation hold should be retained in accordance with the applicable Retention Period under this Policy without regard to litigation hold.

APPENDIX A		
OP = As Needed for Operations		
Type of Record	Official Repository	Duration
ATHLETICS		
Coaching Staff Personnel Records	Athletics	Permanent
Facility Operations Records	Athletics	OP
NCAA Eligibility and Compliance Records	Athletics	Permanent and/or OP
Operations Records	Athletics	OP
Sports Medicine Records	Athletics	7 years from graduation
Student Athlete Records	Athletics	7 years from enrollment or OP
Summer Camp Records	Athletics	7 years from attendance
Ticket Records	Athletics	OP
AUDIT		
Conflict of Interest Employee Disclosure Forms	Internal Audit	10 years
External Audit Reports	Internal Audit	20 years
Internal Audit Reports	Internal Audit	20 years
BOARD OF TRUSTEES		
Board Meeting Minutes (Board of Trustees, Committees)	Secretary, Bd. Of Trustees	Permanent
Governance Records (University Charter, Bylaws)	Secretary, Bd. Of Trustees	Permanent
CAMPUS SAFETY		
Air Monitoring or Area Sampling Reports	Environmental Health & Safety Department	Employment + 10 years
Chemical Inventories and Lists	Environmental Health & Safety Department	5 years
Hazardous Material Spill Reports	Environmental Health & Safety Department	30 years
Hazardous Waste Disposal (CERCLA) Manifests and Reports	Environmental Health & Safety Department	Permanent
EH&S Incident Reports	Environmental Health & Safety Department	5 years
Fire Incident Reports	Life Safety Department	5 years

APPENDIX A		
OP = As Needed for Operations		
Type of Record	Official Repository	Duration
CAMPUS SAFETY (Continued)		
Fire Protection Systems Records	Life Safety Department	5 years
Fire Inspection Records	Life Safety Department	5 years
Accreditation Records	University Police	3 years
Annual Crime Reports and Related Documentation	University Police	7 years
Citations	University Police	7 years
Dispatch Operator – Audio Records	University Police	1 year
Investigation Records	University Police	7 years
Staff Personnel Files	University Police	4 years after termination
Prosecutions	University Police	7 years
Video Surveillance Footage	University Police	14 days
DEVELOPMENT & ALUMNI RELATIONS		
Alumni Association Board of Directors (Membership, Minutes)	Development & Alumni Relations	Permanent
Alumni Publications (e.g., Alumni Bulletin)	Development & Alumni Relations	Permanent
Campaign Records	Development & Alumni Relations	Permanent
Class Yearbooks	Development & Alumni Relations	Permanent
Constituent and Donor Records	Development & Alumni Relations	Permanent
Contact Reports	Development & Alumni Relations	Permanent

APPENDIX A		
OP = As Needed for Operations		
Type of Record	Official Repository	Duration
DEVELOPMENT & ALUMNI RELATIONS (Continued)		
Contribution Records and Documentation	Development & Alumni Relations	Permanent
DAR Confidentiality Agreements	Development & Alumni Relations	Permanent
DAR Policies	Development & Alumni Relations	Permanent
Endowment Agreements	Development & Alumni Relations	Permanent
Philanthropically Funded Position and Scholarship Records	Development & Alumni Relations	Permanent
ENDOWMENT		
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	OP
FACILITIES		
Building/Site Plan Specifications	Office of Facilities	Permanent
Building Waste Disposal Records (regulated; e.g., asbestos, contaminated soil, demolition waste, lead paint, and PCBs)	Office of Facilities	Permanent
Building/Zoning Permits	Office of Facilities	Permanent
Capital Construction Final Payment Records	Office of Facilities	See Accounts Payable Records
Capital Construction Materials and Equipment Info/Correspondence	Office of Facilities	Permanent

APPENDIX A		
OP = As Needed for Operations		
Type of Record	Official Repository	Duration
FACILITIES (Continued)		
Capital Construction Project Contracts	Office of Facilities	Length of Contract + 7 years
Maintenance Records	Office of Facilities	10 years
Operating Permits (e.g., elevators)	Office of Facilities	3 years from expiration
FACULTY		
HIRING		
Academic Search	Office of the Provost	3 years after search
PROMOTION & TENURE		
Promotion Reviews	Office of the Provost	6 years after retirement or termination
Tenure Reviews	Office of the Provost	6 years after retirement or termination
ACADEMIC ADMINISTRATIVE RECORDS		
Faculty Meeting Minutes, Agendas, etc.	Secretary of the Faculty	OP
Electronic Voting/Faculty Ballots	Office of Institutional Research & Strategic Analytics	OP
Faculty Teaching Evaluations	Office of Institutional Research & Strategic Analytics	OP
FACULTY PERSONNEL FILES		
Tenure/Tenure Track Faculty (Appointment and Reappointment Letters, Professional Activity Reports, Travel Requests), Term Faculty, Visiting Faculty	Office of the Provost	6 years after retirement or termination
Adjunct Faculty	College of Hire	6 years after retirement or termination
Faculty and Instructional/Research Personnel Disciplinary/Conduct Records	Office of the Provost	6 years after retirement or termination
Investigation Records, Policy on Ethical Conduct in Academic Research, Scholarship, and Creative Activities	Office of the Provost	5 years after resolution of matter under investigation

APPENDIX A		
OP = As Needed for Operations		
Type of Record	Official Repository	Duration
FINANCE & ADMINISTRATION		
ACCOUNTING & FINANCE RECORDS		
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
Bond Financing Documents	Office of the Treasurer	Term of Bonds + 7 years
BUDGET RECORDS		
Budget Records	Budget Office	Approved Budget – Permanent Background Documents – 10 years

APPENDIX A		
Type of Record	Official Repository	Duration
FINANCE & ADMINISTRATION (Continued)		
PAYROLL RECORDS		
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
Employment Eligibility Verification I-9 Forms	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	Payroll Office	5 years
W-4 Forms	Payroll Office	5 years after superseded or employment ends
Wage or Salary Histories	Payroll Office	5 years
TAX		
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	7 years
Unrelated Business Tax Income (UBTI) Returns	Controller's Office	6 years
GOVERNMENT RELATIONS		
External Board Service Records	Government Relations	5 years from the expiration of the commitment to the organization

APPENDIX A		
Type of Record	Official Repository	Duration
GOVERNMENT RELATIONS (Continued)		
Federal/State Appropriations Requests	Government Relations	10 years
Government Grants 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
HUMAN RESOURCES		
AFFIRMATIVE ACTION/EQUAL OPPORTUNITY		
AA/EO Statistics and Reports	Office of the Provost	10 years
Affirmative Action Plans	Office of the Provost	Permanent
HIRING		
Hiring (Applications/Resumes)	Human Resources	6 years after retirement or termination
Job Postings/Search	Human Resources	3 years from filling position or terminating search
Employment Eligibility Verification I-9 Forms	Payroll Office	3 years after date of hire or 1 year after date of last employment, whichever is later
EMPLOYEE PERSONNEL FILES		
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)	Payroll Office	OP
BENEFITS & PENSION RECORDS		
Beneficiary Designation Records	Human Resources	5 years from payment of benefits in full
Disability and Sick Leave Records	Human Resources	6 years

APPENDIX A		
Type of Record	Official Repository	Duration
HUMAN RESOURCES (Continued)		
BENEFITS & PENSION RECORDS (Continued)		
Employee Assistance Program (EAP)	Human Resources	7 years
Health, Life, and Disability Insurance Plan Documents	Human Resources	Permanent
Retirement/Pension Plans	Human Resources	Permanent
INFORMATION TECHNOLOGY		
Information Security Access Records	Library & Technology Services	1 year
Information Systems Backup Recovery Media	Library & Technology Services	Three (3) most recent backup cycle
Information Systems Assistance Records	Library & Technology Services	OP
Phone System Records (CDR)	Library & Technology Services	1 year
Information Systems Usage Records	Library & Technology Services	OP
HIPAA Policies and Procedures	Library & Technology Services	6 years from date of creation or the date the policy was last in effect, whichever is longer
Email/Google Docs – Normal	Library & Technology Services	1 year from the date an account is closed
Email – Litigation Hold	Library & Technology Services	Data with active Litigation holds are retained indefinitely
Maintenance Records – Data Center	Library & Technology Services	Calendar year end + 3 years
Information Systems Documentation	Library & Technology Services	Discontinuance or modification
Information Systems Data or Data Dictionary Documentation	Library & Technology Services	Discontinuance or modification
Source Code	Library & Technology Services	Disposition is until three (3) source code productions or discontinuance or modification of the related application, but not before the application’s data is destroyed or transferred to a new structure or format.

APPENDIX A		
Type of Record	Official Repository	Duration
INSTITUTIONAL RESEARCH & STRATEGIC ANALYTICS		
Surveys administered by the Office of Institutional Research & Strategic Analytics	Office of Institutional Research & Strategic Analytics	Permanent
LEGAL		
OGC Contracts*	Office of the General Counsel	Length of contract + 7 years *Pertains only to contracts signed by OGC. Each Department is the Official Repository for its own contracts (i.e., contracts signed by personnel within that Department)
Government 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
PURCHASING		
Certificates of Insurance (vendors)	Purchasing Services	7 years
Contractor Performance Bonds	Purchasing Services	Length of contract + 7 years
Purchasing Contracts	Purchasing Services	Length of contract + 7 years
OneCard Program Documents (user agreement, maintenance form, and expense reports)	Purchasing Services	7 years
Purchase Orders	Purchasing Services	7 years
Requests for Proposals and Responses to RFPs	Purchasing Services	7 years
Travel Reimbursements	Purchasing Services	7 years
Unimarket Forms (user enrollment forms, vendor add/create request forms, sole source justification forms, blanket and service order request forms)	Purchasing Services	7 years
REAL ESTATE		
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

APPENDIX A		
Type of Record	Official Repository	Duration
RESEARCH ADMINISTRATION/TECH TRANSFER		
Animal Care and Use Records	Research Integrity	3 years after conclusion of research
Corporate Sponsored Research Agreements	Office of Research and Sponsored Programs	Length of contract + 7 years
Federal Grants – Funded Grant Proposals	Office of Research and Sponsored Programs	3 years from the last to occur of the following: - the date of submission of the final expenditure report; OR - for Federal awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Exceptions see *
Federal Grants – Financial Records	Research Accounting	
Federal Grants – Supporting Documents	Office of Research and Sponsored Programs	
Federal Grants – Statistical Records	Office of Research and Sponsored Programs	
Federal Grants – Research Effort Reporting	Research Accounting	
Federal Grants and Awards – All Other Records	Office of Research and Sponsored Programs	
<p>* Exceptions: (a) If any litigation, claim, or audit is started before expiration of 3-year retention period, records must be retained until all litigation, claims, or audit findings involving such records have been resolved and final action taken; (b) When notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the record retention period.</p>		
Human Subject Records	Research Integrity	3 years after conclusion of research
Invention Assignment Forms	Office of Technology Transfer	Permanent
Licensing Agreements	Office of Technology Transfer	7 years from expiration or termination of agreement
Research Effort Reporting	Research Accounting	3 years after close of grant
Confidential Disclosure Agreements (CDAs)	Office of Technology Transfer	7 years from expiration of the confidentiality term
Copyright and Trademark Filings	Office of Technology Transfer	Permanent
Material Transfer Agreements (MTAs), Option Agreements, and other Inter-Institutional agreements where Lehigh has technology-related obligations to the other party	Office of Technology Transfer	7 years from expiration or termination of agreement
Shareholder’s Agreements, Stock Purchasing Agreements, and other technology agreements related to Lehigh’s equity stake	Office of Technology Transfer	Indefinitely until the liquidation of the equity holding

APPENDIX A		
Type of Record	Official Repository	Duration
RESEARCH ADMINISTRATION/TECH TRANSFER (Continued)		
Export Control documentation including, but not limited to, analyses of license requirements, issued licenses, travel certifications, shipping documents, and correspondence related to export transitions	Research Integrity	5 years after: <ol style="list-style-type: none"> 1. the date of a subject transaction 2. expiration of a license or other approval 3. date of an export, or 4. the date property blocked or fund transfers retained are unblocked
PATENTS & TRADEMARKS		
Patents	Office of Technology Transfer	Permanent
Royalty Records	Office of Technology Transfer	Life of Technology/Patent or Trademark + 6 years
Trademark Filings	University Communications & Public Affairs	Permanent
RISK MANAGEMENT & INSURANCE		
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
STUDENT RECORDS		
ACADEMIC		
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	Life of the student record file
Grade Sheets	Office of the Registrar	Permanent

APPENDIX A		
Type of Record	Official Repository	Duration
STUDENT RECORDS (Continued)		
Graded Assignments (Exams, Papers)	Faculty Member	1 year from the end of the term in which the assignment was submitted
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
GRADUATE ADMISSIONS RECORDS		
Applications for Admission and previous institution transcripts for students who register for at least one class	Enrollment Management Services, Office of the Registrar	Permanent
Applications for Admission and previous institution transcripts for students who do not register for at least one class	Enrollment Management Services, Office of the Registrar	5 years after application term
Application reviewer/reader comments	College Dean's Offices	OP
International Student Forms (I-20, Financial Certification, etc.) for students who register for at least one class	Office of International Students and Scholars, Enrollment Management Services	Permanent
International Student Forms (I-20, Financial Certification, etc.) for students who do not register for at least one class	Office of International Students and Scholars, Enrollment Management Services	5 years after application term
Official Standardized Test Scores	Enrollment Management Services, Office of the Registrar	Permanent
Letters of Recommendation for students who register for at least one class	Enrollment Management Services	Census date of application term
Letters of Recommendation for students who do not register for at least one class	Enrollment Management Services	Census date of term 1 year after application term

APPENDIX A		
Type of Record	Official Repository	Duration
STUDENT RECORDS (Continued)		
UNDERGRADUATE ADMISSIONS RECORDS		
Advanced Placement or International Baccalaureate Records	Enrollment Management Services, Office of the Registrar	Permanent
Applications for Admission (Enrolling Students) and Related Records (Prior Institution Transcripts, etc.). This includes reader ratings associated with academic performance, HS curriculum, involvement, and auxiliary (overall rating)	Office of Admissions, Office of the Registrar	Permanent
Applications for Admission (Non-enrolling Students) and Related Records (Prior Institution Transcripts, etc.)	Office of Admissions	5 years from application date
Application reviewer/reader comments	Office of Admissions	OP
International Student Forms (I-20, etc.) for students who register for at least one class	Office of International Students and Scholars	Permanent
International Student Forms (I-20, etc.) for students who do not register for at least one class	Office of International Students and Scholars	5 years
Official Standardized Test Scores	Office of Admissions	Permanent
Letters of Recommendation for students who register for at least one class	Enrollment Management Services	Census date of application term
Letters of Recommendation for students who do not register for at least one class	Enrollment Management Services	Census date of term 1 year after application term
Docket of Record	Office of Admissions	OP

APPENDIX A		
Type of Record	Official Repository	Duration
STUDENT RECORDS (Continued)		
STUDENT TUITION, BILLING, & FINANCIAL AID RECORDS		
Financial Aid Applications	Office of Financial Aid	5 years from graduation date or date of last attendance
Gold Plus Merchant Participation Agreements and Records	IDEAL Office	Length of contract + 7 years
Gold Plus User Records	IDEAL Office	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
GENERAL STUDENT RECORDS AND REPORTS		
Commencement Programs	Office of the Registrar	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 unless expunged through the Dean of Students' records expungement policy
Student Employment Records (including Privacy Statements)	Department of Hire	OP
Student Health Care/Medical Records	University Health and Wellness Center	7 years following the last date of service or 7 years from the date of graduation or withdrawal, whichever is longer
Tuition and Fee Charges	Office of the Bursar	6 years
UNIVERSITY COMMUNICATIONS & PUBLIC AFFAIRS		
UCPA Contracts	University Communications & Public Affairs	Length of contract + 7 years
Institutional Publications	University Communications & Public Affairs	Permanent
Press Releases	University Communications & Public Affairs	Permanent