RECORDS MANAGEMENT AND RETENTION POLICY

December 1, 2019

Records Management and Retention Policy

This policy outlines the schedule for safeguarding, retaining and disposing of official college records. Official records are those that are original, unique or of continuing importance to the college and have legal, fiscal, administrative, or historical purpose. All faculty and staff who manage institutional records, as defined in this policy, are accountable for knowing and adhering to the requirements of this policy.

The purpose of a centralized policy is to ensure that Alma College:
- Maintains key records for an appropriate length of time.
- Meets legal requirements for record retention.
- Responsibly manages the use of physical and digital storage space.
- Preserves the history of the college.
- Disposes of outdated records in keeping with confidentiality requirements.

College Records

For the purposes of this policy, college records are defined as all records prepared, owned, used, retained by, or in the possession of an individual in the performance of an official function of the college. This includes both paper documents and electronic records. College records are the property of Alma College and not of the officers, faculty members, or employees who create them or to whom they are entrusted.

Types of Records

- An **Active Record** is any record that is currently in active use by an office or function of the college.
- An **Archival Record** is an inactive record that has permanent or historic value and is not required to be maintained in the office in which it was originally generated. In most instances, archival records are maintained in the college archives in the library.
- **Departmental Records** include documents or digital records that do not meet the criteria to be included on the record retention schedule, however, they are necessary for departmental operations. For such records, the department should retain them for as long as they are useful to departmental operations (e.g. departmental meeting minutes, assessment plans, alumni lists, marketing materials, monthly reconciliation reports).
- An **Inactive Record** is a record that is not currently in use but must be maintained according to the Record Retention Schedule. Inactive records may be maintained in an off-site storage facility or other location on campus. *Note: Inactive records of historical significance should be maintained in the college archives as indicated above.*
- Any record with **Personal Information** including an individual's name and government identification number (including social security number, driver's license number or other), financial account number, or any number that alone or in conjunction with another piece of information could be used to assume the identity of another person is highly sensitive and must be safeguarded at all times and when appropriate, destroyed following the procedures listed under the Disposal of Records section of this policy.
- **Grant Records** are those records directly pertaining to applying for and/or receiving external or in-house grants. They include award letters, copies of proposals, copies of agreed upon budgets, reports, etc. Unless a longer period is specified in the grant documents, all grant records will be maintained in hard copy throughout the active period of the grant and for five years after the grant term. All grant records should be digitized into the Softdocs Etrieve system for subsequent retrieval. The Financial Services Department will retain the official copy of the

final financial report on all grants. Records for research grants will be maintained by the Provost's Office. The official record of foundation grants will be maintained by the Advancement Office. Copies of grant records should be maintained by the implementing department or office while active.

- **Meeting minutes** include minutes of Board of Trustees' meetings, standing committees, and departmental meetings. Minutes provide a record of past decisions and how the decision was made. Records of standing committees as defined in the Alma College By-laws, the Manual of Organization and Employment, and the Faculty Organization Constitution should be posted either to a Sharepoint site or the designated Board site for permanent retention.

Electronic Records Storage

An electronic record is one maintained in a digital format, such as a word processing document, spreadsheet, database, scanned or imaged document and any other type of file stored on a computer, storage device or on any external or off-site storage medium, or with a third party acting as the college's agent.

The college uses Softdocs Etrieve as the campus electronic document management system to provide audited identity-based document storage and retrieval, reduce the physical document storage footprint, and simplify policy compliance. Collaboration between offices of the college is simplified as is disaster recovery planning and implementation. Responsibility for maintaining the Etrieve system and providing training to authorized personnel rests with Information Technology Services. The Etrieve platform allows paper records to be digitized, indexed, and stored to a secure repository. Documents may be retrieved by authorized users from any browser-based network device. Etrieve uses single sign-on to ensure secure content access. It also maintains a detailed document audit trail.

Another Etrieve module, Forms, allows departments to improve efficiency and modernize business processes by eliminating paper forms. Online Etrieve forms generate and store documents directly to the Etrieve archive and may leverage defined workflows for approvals, document routing, and notifications.

Email accounts should never be considered the repository for official college records. Records that are received through email should either be printed and retained in hard copy for the duration of the retention period or digitized through Softdocs Etrieve.

Offices and Departments Responsible for Recordkeeping

The appended table identifies the primary office or department responsible for maintaining key records and establishes the minimum required retention period, based upon legal and institutional requirements. Following the required retention period, the unit listed as the primary record keeper is responsible for destruction of the records. All offices and departments are required to:
- Implement records management and retention practices consistent with this policy.
- Educate staff on records management requirements for the department.
- Properly dispose of inactive records at the end of the applicable retention period.
- Protect records against misuse, misplacement, damage, unintended destruction or theft.
- Monitor compliance with this policy.

Retention Periods

The retention period should be the length of time that the record is useful or is required to be kept based upon external criteria such as legal or accreditation requirements. **Records pertaining to ongoing or pending audits, unresolved complaints/disputes or legal actions should not be destroyed, damaged or altered until the matter is resolved and the office has received specific advice from the President or Chief Operating Officer that such records may be destroyed.**

This policy will not establish a common requirement for destruction of departmental correspondence files. Such files should be retained as long as the information is useful, using a general guideline of up to three years after a matter is resolved. There may be instances where departments elect to keep a document beyond the established retention period. However, space requirements and costs should be considered.

Faculty Retention of Student Exams, Papers and Grade Books

FERPA classifies exams, student papers and grade books as educational records and requires that they be maintained in a secure location. The college recommends the following retention schedule:

- Exams and graded work should be retained for one year after course completion if the work is not returned to the student.
- Faculty members' grade books should be retained for five years after course completion.

Faculty members who leave Alma College are responsible for leaving student records with the chair of the appropriate academic department with a notation of destruction date.

For course records stored in Moodle, the instructor's materials remain accessible for seven years after the last day of the semester. Instructors who wish to make a personal backup of their course data should contact the Information Technology Services for the current procedures.

Disposal of Records

If the record retention period has expired and the record is not appropriate for the college archives, privacy and confidentiality concerns should be considered in determining the method of destruction. Records with personal identifying information should be shredded or modified to make the personal identifying information unreadable. Shredding of documents may be accomplished using a machine that meets current document destruction standards or by using a certified document destruction company. Non-confidential records can be recycled or disposed of in trash receptacles.

Policy Development and Revision

This policy was developed following a review of policies of peer institutions and the recommendations of the American Association of Collegiate Registrars and Admissions Officers (AACRAO). The college acknowledges that not all documents produced at Alma College will be listed in the attached. Questions regarding records not referenced in this policy should be referred to the employee's supervisor or the head of the sector for clarification. Suggested revisions to the policy or the record retention schedule should be submitted to the Policy and Planning Council at policyplanningcouncil@alma.edu. The Policy and Planning Council will review the recommendation and determine whether to submit the revision to the President's Cabinet for review and approval.

Policy and appended Retention Schedule approved by the President's Cabinet: December 2, 2019
Next review scheduled for January, 2021.