

Ohio Wesleyan University

Record Retention Policy

The goals of this policy are:

- (1) to ensure that all non-critical records are retained for no longer than the minimum period required by law, thereby eliminating the storage space problem and minimizing expenses;
- (2) to ensure that all critical records, including those which may substantially affect the obligations of the School or document the School's compliance with the law, are retained for a sufficient period of time as to be useful to that end; and
- (3) to ensure that records are destroyed only pursuant to a standard policy which has been developed for business reasons.

Contacts

Direct any questions about this policy to your department's administrative manager. If you have questions about specific issues, call the following offices:

Subject	Contact	Telephone
Electronic Records	Information Services	3131
Archives	United Methodist Archives	3285
Archives	OWU Historical Collection	3287
Archives	Rare Books/Special Collections	3288
Personnel Records	Human Resources	3394
Legal/Insurance	Vice President for Finance	3352
Student Records	Registrar	3200
Policy Clarification or Exceptions	AVP & Controller	3363

Record Retention Schedule

Attached to this policy is a Records Retention Schedule. This Schedule sets forth the recommended minimum retention period for each category of records. The categories are intended to be general and should be interpreted as including all types of records relating to that category, including correspondence, notes, reports, etc. The schedule also lists the official repositories for School records. Departments that are not official repositories and that retain duplicate or multiple copies of these records should dispose of them when they are no longer useful.

Records not identified should not be disposed of without first consulting with the AVP & Controller.

This policy shall apply to all records regardless of whether the records are stored on paper or on computer hard drives, floppy disks or other electronic media.

Departments that maintain School records are responsible for establishing appropriate record retention management practices. Each unit's administrative manager or a designee must:

- √ implement the unit's and/or office's record management practices;

- √ ensure that these management practices are consistent with this policy;
- √ educate staff within the administrative unit in understanding sound record management practices;
- √ preserve records of historic value and transfer those records to the Archives;
- √ ensure that access to confidential files is restricted with long-term restrictions on access to records that are archived being established at the time records are placed in permanent storage; and
- √ destroy inactive records that have no archival value upon completion of the applicable retention period.

The AVP & Controller is responsible for the overall administration and enforcement of this policy. Either the AVP & Controller or another responsible person will monitor general compliance with this policy and is specifically charged with overseeing periodic reviews of records in accordance with the policy.

Preserving or Disposing of School Records

Following the minimum retention period, a determination of whether to preserve or dispose of the documents must be made. If there is a question regarding whether a record has historic value to the School, consult the University Archivist, who has authority to designate which records shall be archived.

Records to be destroyed in accordance with the attached retention schedule should be destroyed using a method that preserves the confidentiality of the information, if applicable.

Off-site Storage

If records must be moved to an off-site storage location, the following considerations should be made when determining how such records will be stored:

- √ Access and retrieval needs, including frequency of retrieval, emergency access needs and potential costs associated with retrieving the records.
- √ Specific environmental conditions necessary to preserve the records.
- √ Security requirements to prevent unauthorized access to the records.
- √ Filing system to permit rapid retrieval of records.

Documents that are sent to storage should be identified by category and should indicate a planned destruction date determined in accordance with the attached schedule. The individual responsible for carrying out this policy shall use these dates to identify records ready for destruction.

Suspension of Document Destruction Process

The School acknowledges its responsibility to preserve information relating to litigation, audits and investigations. The Sarbanes-Oxley Act of July 30, 2002, makes it a crime to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding. Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against the School and its employees and possible disciplinary action against responsible individuals (up to and including termination of employment). Each employee has an obligation to contact the V.P. for Finance, Administration & Treasurer of potential or actual litigation, external audit, investigation or similar proceeding involving the School that may have an impact as well on the approved records retention schedule.

The legally-required retention periods set forth on the attached schedule presumes the operation of the School in the "ordinary course of business." Destruction of records relating to litigation or governmental investigations may constitute a criminal offense. The V.P. for Finance, Administration & Treasurer shall be responsible for suspending destruction of any School records as soon as litigation, federal government investigation, civil action, audit by a governmental agency or enforcement proceeding is suspected, reasonably anticipated or is commenced against the School, its officers, directors or employees. The V.P. for Finance, Administration & Treasurer shall be responsible for notifying individuals at the School responsible for record retention activities to ensure that destruction of records is suspended until the litigation, investigation or proceeding is complete.

Guidelines for Disposition of Electronic Mail Messages

Work related electronic mail ("e-mail") messages are corporate records and must be treated as such. It is the responsibility of the sender of the e-mail message and the recipient of messages from outside the School to manage e-mail messages according to this records retention policy. An e-mail message that does not meet the definition of a record (i.e., personal e-mail or junk e-mail) should be deleted immediately from the system.

The School's e-mail servers are NOT intended for long-term record retention. E-mail messages and any associated attachment(s) with retention periods greater than three (3) years should be kept in similar fashion to paper records or electronically stored in an appropriate file on the network drive, so that it may be maintained and stored in accordance with the records retention policy. It is important to note that the e-mail messages should be kept with any attachment(s). The printed or electronic copy of the e-mail message must contain the following header information:

- who sent the message;
- who the message was sent to;
- date and time the message was sent; and
- the subject of the message.

When e-mail is used as a transport mechanism for other record types, it is possible, based on the content, for the retention and disposition periods of the e-mail message and the transported record(s) to differ. In this case, the longest retention period shall apply.

An e-mail message can be deleted once a paper copy has been printed or the e-mail message has been stored electronically in a file on the network drive. The paper copy or the electronic copy must be retained for the correct time period as determined by this record retention policy.

It is Information Technology Services' policy to keep three months of daily backups of active email accounts. When employees separate from service their email accounts are archived for one year.

Additional Information – Student Records

In accordance with the Family Education Rights and Privacy Act (FERPA), students may inspect their education records. In addition, FERPA limits disclosure to others of personally identifiable information from education records without the student's prior written consent. Finally, FERPA provides students the opportunity to seek correction of their education records where appropriate. For more information on FERPA and the release of students' information, please refer to the FERPA policy set forth in the School's Student Handbook.

Some student records contain private health information and are subject to the provisions of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). For more information on HIPAA and the protection of private health information, please refer to the School's HIPPA policy.

Records Retention Schedule

A. Corporate Records

Item	Minimum Retention Period	Official Repository
Charter	Permanent	Vault
Bylaws	Permanent	Vault
Board meeting agendas & materials	5 years	President
Board and standing committee meeting minutes	Permanent	President
Conflict of interest disclosure forms	5 years	President
Trustee files (info on individual trustees including correspondence)	Permanent	President
Licenses	Permanent	Vault
Accreditation Documents	Permanent	Provost
Accreditation Supporting Documents	10 years	Provost
Campus Crime Reports	Permanent	Student Affairs

B. Finance & Administration

Item	Minimum Retention Period	Official Repository
Accounts payable ledger, vouchers and attachments	5 years	AVP & Controller
Purchasing & Credit Card statements & receipts	5 years	AVP & Controller
Accounts receivable ledger and statements	5 years	AVP & Controller
Account Reconciliations (balance sheet)	5 years	AVP & Controller
Auditor management letters	5 years	AVP & Controller
Banking Records, including deposit and withdrawal records, bank statements and reconciliation, voided and canceled checks	5 years	AVP & Controller
Billing Records	5 years	AVP & Controller
Capital Equipment Records	Life of Asset; records of equipment purchased on federal funds must be retained for 3-years after final	AVP & Controller

	disposition	
Cash Receipts	5 years	AVP & Controller
Chart of accounts	5 years	AVP & Controller
Contracts & agreements	5 years after all obligations end	VP Finance, Administration & Treasurer
Correspondence – general	1 year	Various
Depreciation Records	Life of Asset	AVP & Controller
Equipment files & maintenance records	5 years after disposition	Various
Expense reports	5 years	AVP & Controller
Financial statements (audited)	Permanent	AVP & Controller
Financial statements work papers	5 years	AVP & Controller
Indirect Cost Rate Calculations	5 years	Sponsored Research Adm
Inventories	Life of Asset	AVP & Controller
Dept of Homeland Security Form I-9 (store separate from personnel file)	Greater of 1 year after end of service, or 3 years	Human Resources
Ledgers & journals (includes bank reconciliations, fund accounting by month, payouts allocation, securities lending, single fund allocation, trust statements)	5 years	AVP & Controller
Investment performance reports	5 years	VP Finance, Administration & Treasurer
Investment manager correspondence	3 years	VP Finance, Administration & Treasurer
Investment manager contracts	5 years after all obligations end	VP Finance, Administration & Treasurer
Investment consultant reports	5 years	VP Finance, Administration & Treasurer
Bond proceeds expenditures	3 years after the bond is retired	VP Finance, Administration and Treasurer
Journal entries with backup	5 years	AVP & Controller
Detail General Ledger	5 years	AVP & Controller
Subsidiary Ledgers	5 years	AVP & Controller
Trial Balances	5 years	AVP & Controller

C. Insurance Files

Item	Minimum Retention Period	Official Repository
Certificates of Insurance, Indemnification Agreements, Hold Harmless Agreements, Contracts	5 years after expiration	VP Finance, Administration and Treasurer
Insurance Policies (liability, property and other policies)	5 years after expiration	VP Finance, Administration and Treasurer
Incident Reports and Accident Reports	4 years after report date	VP Finance, Administration and Treasurer
Fire inspection reports	5 years	Physical Plant
Safety (OSHA) reports	10 years	Envir Health & Safety
Claims (after settlement)	5 years	VP Finance, Administration and Treasurer

D. Real Estate

Item	Minimum Retention Period	Official Repository
Deeds	7 years after disposition of property	Vault
Leases (expired)	3 years after all obligations end	Vault
Mortgages, security agreements	3 years after all obligations end	Vault
Purchase agreements	7 years after disposition of property	Vault

E. Tax

Item	Minimum Retention Period	Official Repository
Excise Tax Returns	5 years after return	AVP & Controller

	is filed	
Income Tax Returns	5 years after return is filed	AVP & Controller
Information Returns (990, 1099, 8282, etc.)	5 years after return is filed	AVP & Controller
IRS exemption determination & related correspondence	Permanent	Vault
Sales Tax Returns	5 years after return is filed	AVP & Controller
Tax audit closing letters	Permanent	AVP & Controller

F. Alumni Affairs and Development

Item	Minimum Retention Period	Official Repository
Alumni Records	Permanent	Univ Relations
Gift Records	3 years for hard copy records; Permanent for electronic records	Univ Relations
Original Gift Letter Agreements	Permanent	Univ Relations
Planned Gifts and Real Estate Gifts	Permanent	Univ Relations

G. Communications

Item	Minimum Retention Period	Official Repository
Annual reports	Permanent	Communications
Other publications	5 years	Communications
Photos	20 years	Communications
Press clippings	5 years	Communications
Press releases	10 years	Communications
Research reports/surveys	3 years	Communications
Year-end reports	Permanent	Communications

H. Environmental Health and Safety

Item	Minimum Retention Period	Official Repository
Evacuation Drill Records	3 years	Env Health & Saf
Fire Protection Systems Records	3 years	Physical Plant
Hazardous Waste Disposal Manifests and Reports	3 years	Env Health & Saf
Incident Records	3 years	Env Health & Saf
Portable Extinguisher Training Records	3 years	Env Health & Saf
Radiation Dose Reports	Permanent	Env Health & Saf
Radiation Safety Training Records	3 years	Env Health & Saf
Radioactive Materials License and Safety Committee Records	Permanent	Env Health & Saf
Radioactive Material Receiving and Inventory Records	3 years	Env Health & Saf

I. Human Resources

Item	Minimum Retention Period	Official Repository
Consultant contracts/files (expired)	3 years after all obligations end	Human Resources
Contracts with employees	5 years after all obligations end	Human Resources
Disability & sick-benefit records	5 years from date of termination	Human Resources
Employment applications and resumes – non-employees	1 year	various
Employee handbooks	Permanent	Human Resources
Employee orientation & training materials	Permanent	Human Resources
Personnel files, appointment letters and forms	Permanent	Human Resources
Federal Reporting Requirements: welfare benefits and other fringe benefit plans	Permanent	Human Resources
Occupational Injury or Illness Records	5 years	Human Resources
Performance Appraisals	3 years after termination	Human Resources
Search Committee Records, including employment applications, resumes and all applicant search materials	3 years	Various (Recruiting Dept)
Union Agreements	Permanent	Human Resources
Volunteer Registration Forms, Parental Consent Forms and Agreements	3 years	Human Resources
Workers compensation claims (after settlement)	10 years	Human Resources

J. Payroll

Item	Minimum Retention Period	Official Repository
Annual Payment Records	Permanent	Payroll
Imputed Income Records (W2's)	7 years	Payroll
Information Returns filed with Federal and State authorities	7 years after returns filed	Payroll
Leave Reporting Documents	3 years	Human Resources
Payroll Deduction Authorization Forms (W4's)	3 years after employment ends	Human Resources
Payroll Vouchers (Personnel Action Forms)	7 years	Payroll
Record of Payments and Deductions	7 years	Human Resources
Time Cards, student	3 years	Payroll
Time Cards, other	3 years	Payroll
Wage Assignment Orders	7 years after closed	Payroll

K. Pension

Item	Minimum Retention Period	Official Repository
Employee Eligibility for Pension	5 years after death of eligible employee or beneficiary	Human Resources
Employee Personal Information/ Employee Service Records	5 years after death of eligible employee or beneficiary	Human Resources
Plan Administrator Setting Forth Authority to Pay (records of)	10 years	Human Resources
Pension Paid to Employees or Beneficiaries	5 years after death of eligible employee or beneficiary	Human Resources
Pension Plans and All Attached Amendments	10 years	Human Resources
Pensions or Pension Plans filed with Department of Labor and IRS	Permanent	Human Resources

L. Medical

Item	Minimum Retention Period	Official Repository
Health Center Services Patient Records	7 years	Student Affairs/Counseling Center
Counseling Client Records	12 years	Student Affairs/Health Center

M. Patents & Trademarks

Item	Minimum Retention Period	Official Repository
Invention Assignment forms	Permanent	Director of Foundation, Corporate and Government Relations
Licensing Agreements	Permanent	Director of Foundation, Corporate and Government Relations
Original Patents, Trademarks and Related Work Papers	Permanent	Director of Foundation, Corporate and Government Relations
Royalty Records	Life of Patent or TM plus 7 years	VP Finance, Administration and Treasurer

N. Technology

Item	Minimum Retention Period	Official Repository
Software licenses & support agreements	3 years after all obligations end	ITS and various departments

O. Public Safety

Item	Minimum Retention Period	Official Repository
Public Safety Records	4 years	Student Affairs/Public Safety
Accident Repots	4 years after report date	Student Affairs/Public Safety
Crime Reports	4 years after report date	Student Affairs/Public Safety
Property Damage Reports	4 years after report date	VP Finance, Administration & Treasurer

P. Sponsored Projects, Contracts Grants

Item	Minimum Retention Period	Official Repository
Grant and Contract Applications, Proposals and Supporting Documents award documents, contracts, MOUs, PO's and documentation pertaining to the administration of gifts/grants/contracts through close-out.	After grant close 3 years for federal, 7 years for NYS, or as required by granting agency	Director of Foundation, Corporate and Government Relations
Human Subject Records	3 years or contract period	Principal Investigator for Grant

Q. Legal

Item	Minimum Retention Period	Official Repository
Consent Orders	Permanent	VP Finance, Administration & Treasurer
Court Orders	Permanent	VP Finance, Administration & Treasurer
Judgments	Permanent	VP Finance, Administration & Treasurer
Releases	Permanent	VP Finance, Administration & Treasurer
Settlements	Permanent	VP Finance, Administration & Treasurer

R. General Administration

Item	Minimum Retention Period	Official Repository
Directories	2 years	ITS
Institutional Periodicals	2 years	Univ Relations
Correspondence - President	7 years	President
Correspondence – general	5 years	Various
Appointment calendars – President	7 years	President

S. Admissions Data for Applications Not Enrolling (Whether Accepted or Rejected)

Item	Minimum Retention Period	Official Repository
Applications for Admission or Readmission, Correspondence that is relevant, Test Scores, Letters of Recommendation, Transcripts, Essay and Other Achievements	3 years	Admissions

T. Admissions Data for Applicants Who Enroll

Item	Minimum Retention Duration	Official Repository
Application, Acceptance letters, essay, and other achievements	5 years after graduation/date of last attendance	Admissions
Letters of Recommendation, test scores, relevant correspondence, and copies of the application, acceptance letter, essay, transcript and other achievements	3 years	Admissions
Student Waivers for Right of Access	Until graduation/date of last attendance	Registrar
Official Transcripts—high school, other college or other academic institution	Permanent	Registrar

U. Registration and Academic Students Records

Item	Minimum Retention Duration	Official Repository
Academic advisement files	3 years after graduation/date of last attendance	Various
Change of Grade Forms	Permanent	Registrar
Course change records	2 year after date submitted	Registrar
Credit/no credit approvals (audit, pass/fail, etc.)	2 year after date submitted	Registrar
Certification of Graduation	7 years after graduation/date of last attendance	Registrar
Credit by Examination reports/scores (AP,CLEP, etc)	7 years after graduation/date of last attendance	Registrar

Curriculum change authorization (change/declaration of program, major, minor)	7 years after graduation/date of last attendance	Registrar
Degree audit records	7 years after graduation/date of last attendance	Registrar
Student Conduct Records	7 years after date of final obligation, Permanent if expelled or suspended	Student Affairs/Dean of Students
Academic Disciplinary Records	7 years after date of final obligation, Permanent if expelled	Registrar
Divisional transfer requests	7 years after graduation/date of last attendance	Registrar
Enrollment Verifications	2 year from enrollment date	Registrar
Final Grade Rosters	Permanent	Registrar
Graduation Lists	Permanent	Registrar
Hold or Encumbrance Authorizations	Until Released	Student Accounts
Name change	7 years after graduation/last date of enrollment	Registrar
Student Class Schedules	2 year from graduation/ date of last attendance	Registrar
Student Registration Forms	2 year from registration	Registrar
Transcript requests	2 year after date submitted	Registrar
Ohio Wesleyan University Transcripts	Permanent	Registrar
Transfer credit requests/reports	7 years after graduation/date of last attendance	Registrar
Veteran Administration Certifications	7 years after graduation/date of last attendance	Registrar

Withdrawal authorization/leave of absence authorization	7 years after graduation/date of last attendance	Registrar
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V. Academic Personnel

Item	Minimum Retention Period	Official Repository
Academic Search Records	3 years	Provost
Annual Conflict of Interest Disclosure Statements	4 years	President's Office
Grievances	No cause findings, 3 years from determination	Provost
	Cause findings, Permanent	
Tenure or Promotion Reports	Until separation from service	Provost

W. Bursar, Financial Aid Records

Item	Minimum Retention Period	Official Repository
Student Perkins loan records *Some records may be retained for shorter duration. However, specific recordkeeping requirements apply for certain records related to Federal Student Aid programs. 34 C.F.R. 668.24	3 years after loan repaid, canceled, or assigned to Dept. of Education if not being audited*	Controller's Office
Stafford and PLUS loan records	7 years	Office of Financial Aid
Financial Aid awards, grants, fellowships, scholarships (including Federal Work Study and Federal Supplemental Educational Opportunity Grants)	Unsuccessful applicants: 3 years Successful applicants: 4 years after graduation/date of last attendance	Office of Financial Aid

X. Family Educational Rights and Privacy Act (FERPA) Documents

Item	Minimum Retention Duration	Official Repository
Requests for formal hearings	Permanent	Registrar
Requests and disclosures of personally identifiable information	Permanent	Registrar
Student requests for nondisclosure of directory information	Permanent	Registrar
Student statements on content of records regarding hearing panel decisions	Permanent	Registrar
Student's written consent for records disclosure	Permanent	Registrar
Waiver for rights of access	Permanent	Registrar
Written decisions of hearing panels	Permanent	Registrar

Y. Institutional Publications, Statistical Data/Documents, and Institutional Reports

Item	Minimum Retention Duration	Official Repository
Degree statistics, Enrollment statistics, Grade statistics and Race/ethnicity statistics	Permanent	Registrar
Schedule of classes and class lists (institutional)	Permanent	Registrar
Institutional publications (catalogs, handbooks, programs, etc.)	Permanent	Registrar
Advertising materials, other than catalogues	5 years after compilation	Admissions
Class standing reports	Permanent	Registrar
Commencement Programs	Permanent	Registrar
Tuition Fees and Schedules	Permanent	VP Finance, Administration & Treasurer
IPEDS reports	7 years	Institutional Research