

DEPARTMENT: RECORDS MANAGEMENT	
SUBJECT: RECORDS RETENTION & DISPOSAL POLICY	Page 1 of 13
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1 Statement of Policy

To create and retain only such papers and records as are required to effectively carry out its mission and to meet its obligations under the law, and to The Claremont Colleges, departments of The Claremont Colleges, Inc. (TCC), employees, students, constituents, public agencies and others. This Records Retention and Disposal Policy (Policy) provides TCC personnel with instructions for records management, retention and destruction in order to assure the proper handling and maintenance of all Official Records.

SCOPE:

Nonessential or transitory documents such as routine letters and notes that do not amount to acknowledgements or follow-ups are not to be retained by the sender or the recipient. As well, recipients of copies should not retain the copies. Once a document has been finalized, all drafts shall be destroyed. This policy shall apply not only to paper records but to electronic records, microfilms and similar non-paper storage.

Records Management Services (RMS) is responsible for creating and maintaining an inventory listing of all department records whether physical or electronic. A Record Retention Schedule and inventory will be maintained with RMS. At a minimum, it will include but not be limited to the following information:

- Types of records (e.g., personnel files, financial records, corporate records)
- Where the records are stored
- Identification (record dates, destruction dates, storage location, etc.)

No Record, whether paper, electronic, or otherwise will be discarded or rendered inaccessible if that material is required by reason of litigation, government audits, claims, charges, investigation, or enforcement actions. The Sarbanes-Oxley Act of 2002 makes it a crime to alter, cover up, falsify, or destroy any document to prevent its use in an official proceeding. No state or

federal law punishes an officer, director, or employee for failing to destroy a document. Therefore, if there is any doubt, retain the document. Any questions regarding these criteria should be addressed to RMS and legal counsel.

Contents

1	Statement of Policy.....	1
2	Definitions.....	3
3	Policy.....	4
	3.1 <i>Regular Review of Records</i>	4
	3.2 <i>Responsibility for Policy Compliance</i>	4
	3.3 <i>Records Retention Schedule</i>	4
	3.4 <i>Disposition of Records</i>	5
4	Guidelines for Retention of Electronic Records.....	5
	4.1 <i>Email</i>	6
	4.2 <i>Email Archiving Procedure</i>	6
	Roles and Responsibilities	6
5	Appendix.....	7

2 Definitions

These definitions shall apply to this Policy, as well as the [Plan].

Active Records	Records which are accessed regularly, that have not exhausted their retention and still maintain business value
Administrative Value	The value of records for the ongoing business of TCC of records creation or its successor in function
Classification	The process of evaluating a record's content to determine its value for proper assignment to record series and retention
Digital-Born Records	A record created and managed in digital form such as photographs, employment application data and harvested web content
Disposal, Disposition	The final action for a series of records based on retention requirements and appraisal. Records are either archived or purged (shredded, deleted)
eClaremonts	A sub-service of RMS that provides digitization, classification, indexing, and archiving of paper and electronic documents
Electronic Document	Records comprised of information captured through electronic means which may or may not have a paper record for back up
Fiscal Value	Records documenting financial authorizations, obligations, and transactions and are often subject to audit
Historical Value	Records having enduring value evidencing significant actions, policy directives and planning
Inactive Records	Records that are no longer needed to conduct business (see also " <i>Archival Value</i> ")
Legal Hold	A process used to preserve all forms of relevant records and information when litigation is reasonably anticipated.
Legal Value	A record containing evidence of a legally enforceable right or obligation to government and are often subject to official actions such as subpoenas or lawsuits
Office of Record	The department or unit designated as having responsibility for retention and timely destruction of particular types of records
Official Record	Records that relate to TCC business
Record	Information created or received by TCC and serves as evidence to TCC business; operational, organizational, historical and legal
Record Custodian	The department or individual assigned to make decisions on retention and disposition of unit records
Record Retention Schedule	Document that lists the names of the record series along with their agreed retention periods
Record Series	Documents arranged according to a filing system or kept together because they relate to a particular subject or function, result from the same activity, or document a specific kind of transaction
Records Center	Warehouse leased by TCC where physical records are stored
Retention Authority	A local, state, or federal agent law or statute governing compliance to recordkeeping practices, retention, and disposal
Retention Period	The length of time a record is kept according to the prevailing retention authority
Vital Records Organizational Operational	Records needed to resume TCC operations in the event of a disaster. Required to reestablish legal status and existence Required to resume critical business functions and ensure financial strength

3 Policy

It is the responsibility of every person who generates and receives Records to implement this policy in order to:

- Protect against accidental or premature destruction of Records
- Ensure that all Records are retained for at least the minimum period required by applicable state and federal laws or regulations and longer where there is a probability of litigation or actual litigation
- Assure the availability of Records which may affect the obligations of The Claremont Colleges, Inc.
- Guard against breaches of corporate, student, faculty, or employee security and privacy
- Provide for the elimination of unnecessary Records
- Provide for the systematic disposal of Records that have outlived their usefulness based on the attached Record Retention Schedule as well as for a systematic destruction policy which may be asserted against any allegation of deliberate destruction

The following steps and guidelines are to be followed regarding all Records.

3.1 Regular Review of Records

An effective and defensible records disposition program is essential to efficient and compliant records management. RMS will compile an annual report to provide accounting of document dispositions and locations, (document movement and tracking,) departmental grading (compliance), program metrics (highlight program progress and improvements), and to cultivate professional relationships.

3.2 Responsibility for Policy Compliance

Departments have a shared responsibility with RMS to systematically control the records through the entire lifecycle, from their creation to their final disposition, whether that is destruction of the record or transfer of the Record to archives. RMS will document the destruction of all Official Records in the disposition log.

3.3 Records Retention Schedule

The Record Retention Schedule serves as a means of identifying minimum retention and preservation requirements for all Official Records. RMS provides information, training, and support to TCC in all areas of identifying and retaining Official Records. RMS provides guidance in the adoption and adherence to this Policy, training for staff in the preparation, induction, and retrieval of documents into and

out of the Records Center, and the development of appropriate taxonomies for electronic archiving.

3.4 Disposition of Records

RMS is responsible for secure destruction and, with approval from the departments, for destroying Records on the established destruction dates identified. Records should be deleted/destroyed in ways commensurate with their confidentiality and with methods that do not permit recovery, reconstruction or future use of confidential information. All non-confidential paper Records should be recycled. Paper Records containing confidential information (such as personally identifiable information) should be shredded or otherwise rendered unavailable. Electronic Documents or other electronically stored data should be erased and destroyed through degaussing, multiple overwrites, or physical destruction of drives, disks, tapes or other magnetic or electronic storage media to ensure proper destruction. Film, audio, recording and videotapes containing confidential information should be physically destroyed, or, if possible, permanently overwritten with other, non-confidential sound and images.

Destruction performed by vendors shall be subject to the same procedures as those which are described in this Policy.

4 Guidelines for Retention of Electronic Records

Electronic Documents are Official Records if they relate to TCC business. Electronic Documents that do not relate to TCC business are not subject to this Policy. TCC produces and receives Electronic Documents on a daily basis including:

- email
- voicemail
- geographic information systems (GIS)
- webpages
- word-processed documents
- spreadsheets
- databases
- PDFs
- digital images
- video and audio files

All Electronic Documents that are Official Records must be retained as required by this Policy, regardless of whether the Electronic Document is stored on TCC servers or an outsourced or cloud-based server, including email service providers. Electronic Documents should be handled as any other Official Record in terms of retention and disposal.

4.1 Email

The most common form of Electronic Document at TCC is email, which is an Official Record if it relates to TCC business. Email that does not relate to TCC business is not subject to retention. Much of the business-related email is of limited or transitory value, and, as provided by this Policy, may be deleted when it no longer has value to TCC. If an employee is unsure whether an email constitutes an Official Record, RMS can assist staff in classifying whether an email is an Official Record, or not.

Employees must arrange for retention of all email that is an Official Record. Microsoft Office Exchange may do this for the employee, or it may require the employee to take some form of action. If the system in use does not retain such records, office protocols should be arranged to retain them.

4.2 Email Archiving Procedure

Roles and Responsibilities

TCC IT Department: The System Administrator identifies retention policy and moves email to appropriate mail box for retention, back up data stores for retention. All staff email is retained via a database on Microsoft Office Exchange. Each individual end-user's mailbox maintains an average of 2GB of storage and thus retains that volume of email for the period in which an end user's account is active. In some cases staff will exceed this size and will require an archiving of their mailbox into an external .PST that is mapped to a network drive. The method in which data is retained is currently not controlled or mandated. The network drive is backed up for a period of 30 days.

Staff: Account Holders are end users subject to computer use policy, email use policy. All TCC staff are end users subject to computer use policy, email use policy. It is not required that staff archive their email, unless the email is an Official Record that must be retained pursuant to this Policy. By default their email is retained up to 2GB in size. Should they exceed 2GB they should archive their email to a .PST on the provided network drive. The method in which data is retained is currently not controlled or mandated (ex: moves or deletions). The network drive is backed up for a period of 30 days.

5 Appendix

The summary is intended to be a guide for the more frequent or commonly used Records that need to be retained. A complete Record Retention Schedule is available upon request. Retention Periods update periodically to comply with most recent statutes.

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
FIN100	Accounting, Fiscal, Financial	Financial Services	Accounts Payable	Last 7 years	IRS Publication 4221 Jan. 2015
FIN120	Accounting, Fiscal, Financial	Financial Services	Audit Files	7 years from date of conclusion of auditors findings (formerly 5 years from end of fiscal year)	SEC 17 CFR Part 210
FIN130	Accounting, Fiscal, Financial	Financial Services	Bank Records	10 years from the end of the fiscal year	Best Practice as defined by TCC
FIN140	Accounting, Fiscal, Financial	Financial Services	Cash Management	Last 12 mos.	Best Practice as defined by TCC
FIN150	Accounting, Fiscal, Financial	Financial Services	Debt Compliance	Life of bond + 3 years	IRC Section 1.6001-1
FIN160	Accounting, Fiscal, Financial	Financial Services	General Ledger	Permanent	Best Practice as defined by TCC

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
FIN170	Accounting, Fiscal, Financial	Financial Services	Grants	Life of the grant plus 10 years	OMB A-110; OMB A133; 44CFR 14.1, 14.2 and 206, 207(c); Stafford Act 318 and 705; Best Practice as defined by TCC
FIN180	Accounting, Fiscal, Financial	Financial Services	Investments, Endowments, Fund Management	Last 5 years	Best Practice as defined by TCC
FIN190	Accounting, Fiscal, Financial	Financial Services	Journal Vouchers	Permanent	Best Practice as defined by TCC
FIN200	Accounting, Fiscal, Financial	Financial Services	Payroll Records	Last 6 years	Revenue and Taxation code Section 19704, 26 C.F.R. Section 301.6501
FIN220	Accounting, Fiscal, Financial	Financial Services	Student Loans	3 years after loan is satisfied	34 CFR 668.24
FIN230	Accounting, Fiscal, Financial	Financial Services	Taxes, IRS	Permanent	Best Practice as defined by TCC
ADM100	Administrative, Corporate, Governance	Executive Office	Board of Directors Meeting materials	Permanent	AICPA best practices recommendation best practices recommendation
ADM120	Administrative, Corporate, Governance	Executive Office	Governance documents	Permanent	AICPA best practices recommendation best practices recommendation

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	
ADM130	Administrative, Corporate, Governance	Executive Office	Intercollegiate Committee Meeting materials	Permanent	
ADM140	Administrative, Corporate, Governance	Executive Office	Conflict of Interest Statements	7 years	9
ADM150	Administrative, Corporate, Governance	Executive Office	Media and Public Relations	Retain until no longer of administrative value	
ADM160	Administrative, Corporate, Governance	Executive Office	Executive Archive	Retain until no longer of administrative value	
CSA100	Campus Safety	Campus Safety	Daily crime log, Incident Logs and Reporting	7 years	Act
CSA120	Campus Safety	Campus Safety	Annual Reporting of Crime Statistics	7 years	e
EMP100	Employment Records	Human Resources	Personnel Files	3 years after separation	
EMP120	Employment Records	Human Resources	Termination and Employee Litigation	7 years after separation, pro no litigation is pending; if litigation is pending, during active litigation plus 10 yea	

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
EMP130	Employment Records	Benefits Administration	Health Benefits	3 years after separation	29 U.S.C. Section 201-219 29 CFR Section 1627.3 or 28 U.S.C. Section 1658
EMP140	Employment Records	Benefits Administration	Retirement Benefits	7 years after termination of employment	ERISA, DOL, IRS
EMP150	Employment Records	Human Resources	Employment Eligibility Verification	The latter of 3 years from hire date or 1 year after separation	Immigration Reform and Control Act
EMP160	Employment Records	Benefits Administration	Workers Compensation	7 years after separation	Best Practice as defined by TCC
EMP170	Employment Records	Human Resources	Unemployment Records	8 years after separation	26 C.F.R. Section 301.6501(e)-1
EMP180	Employment Records	Human Resources	EEOC, Discrimination	2 years after final disposition of case	Title VII, FEHA, ADEA, ADA, NLRA, FLSA
EMP190	Employment Records	Benefits Administration	Voluntary Disability Insurance (VDI)	3 years after separation	29 U.S.C. Section 201-219 29 CFR Section 1627.3 or 28 U.S.C. Section 1658

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
EMP200	Employment Records	Human Resources	Whistleblower Documentation	7 years after the conclusion of the investigation	Sarbanes-Oxley Act of 2002 (Section 802) regarding records retention (17 CFR 210)
EHS100	Environmental Health & Safety	Environmental Health & Safety	Exposure Records and medical monitoring	30 years after separation	CCR Title 8 §3204 (d)(1)(a) – medical monitoring ; or CCR Title 8 §3204 (d)(1)(b) – exposure monitoring
EHS120	Environmental Health & Safety	Environmental Health & Safety	Hazardous Waste Manifests	Permanent	CCR Title 22 §66262.40(a) and 66264.71(b)(6)
EHS130	Environmental Health & Safety	Environmental Health & Safety	Industrial Hygiene Equipment	Permanent	CCR Title 22 §66262.40(a) and 66264.71(b)(6)
FMC100	Facilities Management & Construction	Central Facilities Services	Construction Documentation	10 years	Best Practice as defined by TCC
FMC120	Facilities Management & Construction	Central Facilities Services	Hazardous Waste Materials	2 years after materials is accepted by carrier	49 CFR §§ 172.201(e), 174.24, 176.24, 177.817(f)
FMC130	Facilities Management & Construction	Central Facilities Services	Regulatory Agency Reporting	3-5 years depending on agency	Title 22, CCR § 66262.40(b)

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
FMC140	Facilities Management & Construction	Central Facilities Services	Fleet Vehicle Maintenance	7 years after disposal of vehicle	Ed Code 89031.5 and Vehicle Code 24007
FMC150	Facilities Management & Construction	Central Facilities Services	Remediation and Abatement	Permanent	40 CFR, Part 763 and 40 CFR, CCR Title 22, 23, 25, 27 and CCR, Title 17, 36000 (b)
FMC160	Facilities Management & Construction	Central Facilities Services	Facility Documentation	Permanent	Best Practice as defined by TCC
FMC170	Facilities Management & Construction	Central Facilities Services	Environmental Planning for Major Capital Projects	5 years then retain until no longer of administrative value.	Section 15075(f) of CEQA guidelines in CCR title 14, Ch. 3; title 14, Ch. 3, Art. 8 (time limits), section 15112
REH100	Real Estate & Housing	Real Estate & Housing	Real Property Records	Permanent	AICPA best practices recommendation best practices recommendation
REH120	Real Estate & Housing	Real Estate & Housing	Leased Property Records	Life of lease + 4 years	AICPA best practices recommendation best practices recommendation
REH130	Real Estate & Housing	Real Estate & Housing	Faculty Loans	Permanent	AICPA best practices recommendation

Record Classification	Record Series	Record Custodian	Document Type	Retention Period	Retention Authority
REH140	Real Estate & Housing	Real Estate & Housing	Housing Management	Permanent	AICPA best practices recommendation
RM100	Risk Management	Risk Management	Insurance Claims	2 years after event or activity	Department of Insurance
RM120	Risk Management	Risk Management	Subrogation Claim	2 years after claim is resolved	Department of Insurance
RM130	Risk Management	Risk Management	Insurance Claims Involving Minor	2 years after claim is resolved + 2 years after claimant turns 18 years	Department of Insurance
RM140	Risk Management	Risk Management	Driver Authorization	Permanent	Department of Motor Vehicles
STU100	Student Records	Student Health Services	Medical Records	7 years from date of graduation	CAL HSC Code 123145 Section 1205
STU120	Student Records	Monsour Psychological and Counseling Services	Counseling and Mental Health Records	7 years from date of graduation	CAL HSC Code 123145 Section 2919
STU130	Student Records	Student Affairs	Student Affairs and Academics	7 years from date of graduation	Best Practice as defined by TCC