



## Record Retention Policy

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### Policy Statement

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Johnson & Wales University requires that university records, regardless of format, be disposed of or retained for specific periods of time in accordance with legal or other institutional requirements, or for historical value.

### Record Retention

Record retention periods are set forth in the record retention schedule. Retention periods for selected records may be increased for various reasons including, but not limited to, government regulation, judicial or administrative orders, contracts, pending or threatened litigation, audit requirements, historical value and/or other institutional requirements. Such changes in the record retention periods must be sent to the policy coordinator who will obtain approval of the requested change from university leadership.

In the event the subject matter of an *email* communication, or a communication on a *social media* site, falls within one of the categories listed on the record retention schedule, a copy of the communication must be retained in accordance with the corresponding retention rate.

### Record Destruction

Records must be deleted/destroyed when they have reached the conclusion of the retention period. Records should be disposed of in a manner which preserves the confidentiality of the record(s). Records that have no retention requirement, and/or duplicate records, must be deleted/destroyed, unless approval to preserve said record is obtained from university leadership through the policy coordinator.

### Reason for Policy

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An effective document retention policy will increase operational efficiency, be used as a tool for compliance with legal and regulatory requirements and will assist JWU in avoiding costly consequences.

### Definitions

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*NEASC-Related Meeting Documentation* – official records, such as minutes or written notes, documenting discussions and decisions made during meetings of university committees with an active and meaningful role in institutional decision-making and governance. During NEASC evaluations, these records provide evidence to document the alignment of our activities with both our own mission and the NEASC Standards for Accreditation.

*Non-Record* - the following categories of materials are not considered records; and therefore, must be deleted/destroyed after they have served their business purpose;

- inventories of printed or reproduced university documents that have been kept for supply purposes,
- books, periodicals, newspapers and other library and museum materials made or acquired and preserved solely for reference or exhibition purposes,

- preliminary drafts of letters, memoranda, reports, worksheets and informal notes which do not represent significant basic steps in the preparation of the record document,
- convenience copies of reports, memoranda, etc. for which your office was not the originator or the office of record, and
- duplicate microfiche.

*Official Repository* – is the location where an original (official) record is kept, and is the location subject to the retention period. Copies of records may be kept for business purposes in other areas; however, those records must be deleted/destroyed after they have served their business purpose, unless otherwise noted in the Record Retention Schedule below.

*Record* - generally defined as *any* form of recorded information, regardless of physical characteristics, that is created, received, recorded, or legally filed in the course of university business or in the university's legal obligations. This includes, but is not limited to, writings, drawings, graphs, charts, images, prints, photographs, microfilms, audio and video recordings, data and data compilations, and electronic media, including email.

*Record Retention Schedule* - provides users with an outline of the length of time that a specific record must be retained before the record should be deleted or destroyed.

*Retention Period* - sets forth how long a record must be maintained.

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## Procedures

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### Storage, Destruction and Deletion of Electronic Records

Secure shredding bins for physical (portable) media (including but not limited to CDs, thumb drives/jump drives/flash drives, floppy disks, microfiche, etc.) have been placed in various locations throughout each campus. An updated list of these locations can be found by visiting <http://helpdesk.jwu.edu/> or contacting the University Help Desk at (401) 598-4357.

***Note: Laptops, external hard drives and university-owned credit card machines should be returned directly to IT for proper destruction. Do not place them in the trash or into secure shredding bins.***

For further help and information on properly storing, destroying or deleting other forms of electronic media (including but not limited to, records located on a desktop, J: drive, G: drive, email, etc.) please visit <http://helpdesk.jwu.edu/> or contact the University Help Desk at (401) 598-4357.

### Storage and Destruction of Paper Records

For help and information on properly destroying or storing paper records, please contact:

Providence Campus - Purchasing at (401) 598-1005

North Miami Campus – campus controller’s office at (305) 892-7042

Denver Campus – campus controller’s office at (303) 256-9360

Charlotte Campus – campus controller’s office at (980) 598-1016

### General Information on Record Retention

For general information or questions about record retention and disposal, please contact the information security manager at (401) 598-3030 or [nicholas.tella@jwu.edu](mailto:nicholas.tella@jwu.edu). For questions regarding retention rates or records omitted from this schedule, please contact the policy coordinator at (401) 598-2183 or [jayne.delsesto@jwu.edu](mailto:jayne.delsesto@jwu.edu).

<b>RECORD RETENTION SCHEDULE</b>		
<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>ACCIDENTS / INCIDENTS</b>		
Accident / Incident Report (Worker's Compensation Related)	6 years	Human Resources & Payroll
Accident / Incident Report	8 years	Campus Safety & Security
Accident / Incident Report Involving Child Sex Abuse	Until child reaches age of majority, plus 7 years	Campus Safety & Security
Accident / Incident Report Involving Employee Exposure to Toxic or Harmful Substances	30 years	Environmental Health & Safety (also, Human Resources & Payroll when an employee is involved)
Accident / Incident Report Involving University Owned, Rented or Leased Vehicles Only	5 years or until vehicle is disposed of, whichever is later	Transportation
<b>ADMINISTRATION</b>		
<b>Accreditation</b>		
NEASC Self Studies and Visit Documentation	Permanent	Office of the University Provost
NEASC Reports and Correspondence	Permanent	Office of the University Provost
Program Level Accreditation Documents	Permanent	Office of the University Provost
<b>Audit</b>		
Audit Reports by External (3 <sup>rd</sup> ) Parties (excluding audited financial statements)	Permanent	Compliance, Internal Audit & Risk Management
Audited Financial Statements	Permanent	Finance
Internal Audit Reports	Permanent	Compliance, Internal Audit & Risk Management
Supporting Documentation for Audits Performed by an External (3 <sup>rd</sup> ) Party	7 years after issuance of report	Appropriate Department
Underlying Internal Audit Test Work and Documentation	7 years after issuance of report	Compliance, Internal Audit & Risk Management
University Policy (promulgated)	Permanent	Compliance, Internal Audit & Risk Management

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>ADMINISTRATION (cont.)</b>		
<b>Committees</b>		
Agendas	1 year	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Agendas (NEASC-related)	12 years	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Bylaws	1 year	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Bylaws (NEASC-related)	12 years	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Meeting Minutes	1 year	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Meeting Minutes (NEASC-related)	12 years	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Committee Recommendation Approvals	1 year	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports
Committee Recommendation Approvals (NEASC-related)	12 years	With Committee Chair so long as he/she sits on Committee; then transfer to the appropriate department to which the committee reports

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>ADMINISTRATION (cont.)</b>		
<b>Contracts</b>		
Contracts where JWU is Contracting Party	Rhode Island – 11 years after contract ends (not under seal)	Procurement
	Rhode Island – 21 years after contract ends (under seal)	
	Florida – 6 years after contract ends	director of administration
	Colorado – 4 years after contract ends	Purchasing
	North Carolina – 4 years after contract ends	campus controller
	Massachusetts – 7 years after contract ends	Procurement (Providence Campus)
Construction Contracts and Agreements (i.e. architects, consultants, construction manager or general contractor and any direct subcontractors)	Permanent, or 11 years after JWU demolishes or sells building	Facilities Management
<b>Corporate Records</b>		
Board and Executive Committee Minutes and Votes (1958 to present, and Bylaws)	Permanent	Corporate Secretary
Bylaws	Permanent	Corporate Secretary
Compensation Committee Minutes (1999 to present)	Permanent	Corporate Secretary
Charters, Amendments, Annual Reports, etc.	Permanent	Corporate Secretary
External Government Relations Meeting Minutes	Permanent	Office of Law & Policy
Government Affairs Files	4 years	Office of Law & Policy
Lobbying Reports	2 years	Office of Law & Policy
Strategic Plans	Permanent	Office of the University Provost
<b>Federal Approvals and Documentation</b>		
Education Department Institutional Approval Notice (formerly Institutional Eligibility Notice)	Permanent	Office of the General Counsel
Eligibility and Certification Approval Report (ECAR)	Permanent	Office of the General Counsel
Program Participation Agreements (PPA)	Permanent	Office of the General Counsel
PPA Transmittal Letter	Permanent	Office of the General Counsel
<b>State Licensure</b>		
Applicable State Licensure	Permanent	Office of the University Provost

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>Marketing</b>		
Advertisements and Commercials	4 years	University Marketing
Drafts of Marketing Materials; Marketing Research and Marketing Plans	5 years	University Marketing
E-Alerts and E-Newsletters	1 year	Appropriate Campus Public Relations Department
Institution Publications	Permanent	University Marketing
Photo and Video Footage Release Forms	Maintain as long as you maintain the photo/video footage. After destroying the image, maintain release for 11 years	University Marketing
Press Clippings (of interest to JWU)	Review annually	Appropriate Campus Public Relations Department
Press Clippings (regarding JWU); and Press Releases	Permanent	Appropriate Campus Public Relations Department
<b>ADMISSIONS</b>		
Admissions Marketing Publications	Permanent	Admissions Marketing
Admissions Record (for those who do not enroll)	2 years after date of non-enrollment	Admissions
Advertisements and Commercials	4 years	Admissions Marketing
Event Registration	1 year from the date of the event	Admissions
Marketing Materials, Marketing Research and Marketing Plans	5 years	Admissions Marketing
<b>CULINARY ARTS MUSEUM</b>		
Admissions Receipts Logs	7 years	Culinary Arts Museum
Donation Files	Permanent	Culinary Arts Museum
PastPerfect Database Records	Permanent	Culinary Arts Museum
Tour Reservation Forms	3 years	Culinary Arts Museum
<b>DEVELOPMENT</b>		
<b>Gift Records</b>		
Accession Forms	7 years	Development
Adjustment Batch Reports (including supporting documentation)	7 years	Development
Electronic Gift Records (Blackbaud Raiser's Edge)	7 years	Development
Gift Batch Reports (including supporting documentation)	7 years	Development
Gift Posting Forms	7 years	Development
Tax Receipts	7 years	Development

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>DEVELOPMENT (cont.)</b>		
<b>Cooperative Agreements, Grants and Subgrants (from public agencies)</b>		
Funded	Minimum required according to the terms of the cooperative agreement/grant/subgrant or 3 years after submission of final expenditure report, whichever is greater	Development
Unfunded	3 years	Development
<b>Private Grants and Subgrants</b>		
Grant Administration Documents	5 years from the date the grantee submits its final expenditure report; if renewed quarterly or annually, then 3 years from submission of report. If the grant is the subject of any litigation, claim or audit started before the expiration of the 5 year period then records must be maintained the longer of the retention period or until the issue is resolved and final action is taken.	Development
Funded Proposals	11 years	Development
Unfunded Proposals	11 years	Development
<b>Gift and Scholarship Agreements</b>		
All Endowed Gift Agreements	Permanent	Development
Charitable Gift Annuity, Charitable Remainder Agreements, Life Insurance Documents, Retirement Plan Beneficiary Documents	Permanent	Development
Original Gift Letter Agreements (signed by the President and Donor)	Permanent	Development
Original Gift Letter Agreements (other)	Permanent	Development
Planned Gifts, Real Estate Gifts	Permanent	Development
Scholarship Agreements (spend down)	11 years after final award is issued under terms of scholarship	Development
Scholarship Agreements (endowed)	Permanent	Development

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>DEVELOPMENT (cont.)</b>		
<b>Constituent Records</b>		
Prospect Research Reports	Prospect Research Reports	Prospect Research Reports
<b>Scholarship Recipient Records</b>		
Scholarship Recipient Consent to Information Release Form	Scholarship Recipient Consent to Information Release Form	Scholarship Recipient Consent to Information Release Form
Scholarship Recipient Questionnaire	Scholarship Recipient Questionnaire	Scholarship Recipient Questionnaire
<b>FACILITIES</b>		
<b>Construction Projects</b>		
Surety Bonds	Until the end of the warranty period	Facilities Management
Building Drawings (all official or original approved copies, including blue prints, plans and as-builts)	Permanent	Facilities Management
CAD Drawings and Project Files	5 years after disposition of property	Facilities Management
Certificate of Occupancy (CO)	Life of building	Facilities Management
Change Orders	11 years after JWU sells or demolishes building	Facilities Management
Construction – Engineering Studies and Reports	Permanent	Facilities Management
Construction Schedules	Life of the project	Facilities Management
Facilities Master Plan	Permanent	Facilities Management
Historic Buildings (official records related to)	Permanent	Facilities Management
Licenses and Permits – Real Property	Useful life of the permit or license	Facilities Management
Property Appraisals	7 years from date property is sold/transferred	Facilities Management
Punchlists	Life of building	Facilities Management
Requests For Information (RFI's)	11 years after JWU sells or demolishes building	Facilities Management
<b>Environmental, Health and Safety</b>		
Elevator Certification	5 years after expiration of certificate	Facilities Management
Employee Audiometer Tests	For duration of employment	Facilities Management
EPA Grant Records	3 years from the date the grant is closed	Facilities Management
Facility Inspection and Safety Audit Records	10 years	Facilities Management



<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>FACILITIES (cont.)</b>		
<b>Environmental, Health &amp; Safety (cont.)</b>		
Fire Drill Records	3 years	Facilities Management
Fire Extinguisher Test Records	3 years	Facilities Management
Fire Protection System Records	3 years	Facilities Management
Hazardous Waste Disposal Manifests and Reports	30 years	Facilities Management
Material Safety Data Sheets	30 years	Facilities Management
<b>Maintenance</b>		
Cleaning and Repairs, and Confined Space Entries (grease trap, manhole, catch basin)	6 months	Maintenance
Facility Work Orders	2 years	Maintenance
Inspection Reports	Useful life of inspection	Maintenance
Machinery and Equipment Maintenance and Repair Records	Life of equipment, except for maintenance records for a piece of equipment where a known injury occurred, then life of equipment plus 5 years	Maintenance
O&M Manuals	Life of equipment	Maintenance
Testing Information and Commissioning Reports	Life of equipment	Maintenance
Warrantees	Length of the warranty	Maintenance
<b>Transportation</b>		
International Fuel Tax Agreement Records (diesel fuel vehicles weighing more than 26,001 lbs.)	4 years from the date of the last report	Student Transportation Services (Providence Campus)
		Facilities Management (North Miami, Denver and Charlotte campuses)
<b>FINANCE</b>		
Credit Card Transactions	1 year	Finance
Endowed Funds and Related Information	Permanent	Finance
Plans (final) and Projections	Current, plus 7 years	Finance
Subsidiary Ledgers	Current, plus 7 years	Finance
Summary Analysis Reports, end of year (fund, source, function)	Current, plus 7 years	Finance
University Audit Work Papers	Current, plus 7 years	Finance
Work Papers (other)	Current, plus 7 years	Finance
<b>Accounting</b>		
Accounts Payable Records	Current, plus 7 years	Finance
Accounting Reports (monthly)	Current, plus 7 years	Finance
Annual Financial Reports	Permanent	Finance
Banking Records, University (including statements, cancelled checks and deposit slips)	Current, plus 7 years	Finance

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>FINANCE (cont.)</b>		
<b>Accounting (cont.)</b>		
Bills and Payment Records, University	Current, plus 7 years	Finance
Books of Account	Current, plus 7 years	Finance
Checks (originals)	Current, plus 7 years	Finance
Daily Cash Report	Current, plus 7 years	Finance
	2 years	Appropriate Department (optional)
Depreciation Schedules	Life of depreciated asset, plus 7 years	Finance
Endowment (or Permanently Restricted) Checks, original	Permanent	Finance
Invoices, University Issued/Received	Current, plus 7 years	Finance
Travel Reimbursements and Attachments	Current, plus 7 years	Finance
<b>Bonds</b>		
Bond Closing Documents (trust indenture, loan agreement, bond counsel opinion, official statements, amendments, etc.)	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Office of the General Counsel
Expenditures of Bond Proceeds (requisitions, vendor invoices, trustee statements, construction contracts, certificates of completion and final allocation of proceeds)	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Finance
Investment of Bond Proceeds (income earned, purchase and sale of securities, yield calculations, guaranteed investment contracts, rebate calculations, rebate payments, Forms 8038-T, etc.)	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Finance
Pre-issuance Processes and Decision-making, including identification of eligible projects and due diligence on environmental and tax aspects of projects	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Office of the General Counsel
Private Business Use (PBU) Monitoring Records (i.e. copies of management contracts, research agreements, etc.)	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Finance

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>FINANCE (cont.)</b>		
<b>Bonds (cont.)</b>		
Sources of Payment or Security for the Bonds	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Finance
Any other documentation material to the particular requirements applicable to tax-exempt bond issue	6 years after the complete retirement of the bond and any bonds that re-fund (including a series of re-fundings) the bond.	Finance
<b>Budget</b>		
Budgets (first and final, all drafts)	Permanent	University Budget Office
Budget Preparation Documents that Backup Annual Budget	3 years	Appropriate Department (optional)
	3 years	Campus Controllers
	5 years	University Budget Office
Final June Reports in Book Form	Permanent	Campus Controllers
	Permanent	University Budget Office
Monthly Budget Reports and Related Trial Balances	3 years	Appropriate Department (optional)
	3 years	Campus Controllers
	3 years	University Budget Office
<b>Insurance</b>		
Certificates of Insurance (university and vendor)	5 years from expiration	Must be retained with the contract
Insurance – Closed Claims (no litigation)	5 years or until claimant turns 21 years of age, whichever is later	Insurance and Property Risk Management
Insurance Policies	11 years after expiration of policy	Insurance and Property Risk Management
Liability Policies	11 years after expiration of policy	Insurance and Property Risk Management
<b>Procurement</b>		
Purchase Cards (including all supporting documentation)	Current, plus 7 years	Purchase Card Holders
Purchase Orders	Current, plus 7 years	Campus Purchasing Departments
<b>Tax</b>		
Assets Information (acquisitions/leases/dispositions)	7 years from date asset is disposed of	Finance
Excise Tax Returns (records supporting items of income deductions and credits)	Current, plus 7 years	Finance
Income Tax Returns	Current, plus 7 years	Finance
Information Returns (including IRS Form 990, 1099, etc.)	Current, plus 7 years	Finance
Sales Tax Returns	Current, plus 7 years	Finance

TYPE OF RECORD	RETENTION PERIOD	OFFICIAL REPOSITORY
<b>FOOD AND HOTEL OPERATIONS</b>		
Allergen Training (including any supporting documentation)	90 days	Practicum
Credit Card Transactions	1 year	Practicum Properties
Commuter Meal Plan Orders	Until the end of the applicable academic year	Practicum
Employee Training Records (i.e. Servsafe, TIPS and other food safety certifications)	4 years	Practicum
Guest Room Safe Signature Card	11 years	Practicum
Health Department Reports	3 years	Practicum
Hotel Licenses and Permits	6 months after expiration	Practicum
I.D.s Charged to Student Accounts	Until the end of the applicable academic year	Practicum
Internal Food Safety Logs (i.e. cold & hot holding, cooking & cooling, temperature, refrigerator and internal food safety)	6 months	Practicum
Internal Gold Standard Inspection	Permanent	Practicum
Job Applications (not hired)	6 months	Practicum
Name Tag Orders	1 year	Practicum
Night Audit Work	7 years	Practicum
Properties Licenses	Life of the license, plus 5 years	Practicum
Security Log Sheet	5 years	Practicum
Sanitation Records	1 year or until after most recent inspection, whichever is later	Practicum
Shellfish Tags	90 days	Practicum
State Health Inspections	Permanent	Practicum
<b>HUMAN RESOURCES</b>		
*NOTE: Records in this section with a designated Official Repository of "Appropriate Department" are the <i>only</i> human resource- and payroll-related records that departments should be keeping. All other human resource- and payroll-related records and information are maintained by Human Resources & Payroll.*		
For specific retention rates related to human resources and payroll records, please contact Human Resources & Payroll.		
Performance Evaluations	1 year after separation from the university	Appropriate Department
Management File	1 year after separation from the university	Appropriate Department

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>INFORMATION TECHNOLOGY</b>		
Acceptable Use Forms (employees)	5 years from last date of employment	Information Technology
Blueprints	Permanent	Information Technology
Computer Inventory	Life of the hardware	Information Technology
Information Technology-related Contracts, copy of (vendor)	Life of the contract	Information Technology
Encryption Keys	Retain as long as the data that the keys decrypt is retained	Information Technology
Forms (Banner Reports, Delegate Request, Retiree)	Until separation from university	Information Technology
Key Sign-in/Sign-out Logs	Permanent	Information Technology
Project Artifacts, Delivery Performance Data, Plants, Requests, Statement of Work	2 years after project completion	Information Technology
Portfolio Management Data	Overwritten within 90 days	Information Technology
Remote Site Information (wiring, leases, classroom software)	Permanent	Information Technology
Resource Planning Reports	Overwritten within 90 days	Information Technology
Request for Proposal (RFP) Responses	1 year after receipt if rejected; 11 years from end of term if accepted	Information Technology
Recording Industry Association or America Notification	Permanent	Information Technology
Service Desk Express Information	1 year after service complete	Information Technology
Server Logs (applications, system, security, password reset logs, account maintenance, IIS, message tracking)	Varies per policy, per system and per compliance requirement	Information Technology
Software	Life of the software	Information Technology
Software License Agreements	11 years after the life of software, or terms of agreement, whichever is greater	Information Technology
Trending Data (virus protection, backup, VMware, performance logs)	Varies by system	Information Technology
Voice and Data Invoices	7 years	Information Technology
Voicemail Messages (Centrex and VoIP)	30 days	Information Technology
Virtual Private Network Request Form	Until the employee separates from the university	Information Technology

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>INSTITUTIONAL RESEARCH</b>		
Census Files	Permanent	Institutional Research
Clearinghouse	Permanent	Institutional Research
College Guide Surveys	2 years	Institutional Research
Enrollment Statistics (Program Level)	5 years	Institutional Research
IPEDS	5 years	Institutional Research
Program Reports	Permanent	Institutional Research
Research Requests (external)	5 years after request	Institutional Research
Student Electronic Surveys	5 years after student graduates or leaves the university	Institutional Research
Student Paper Surveys	Until analysis and reports are completed	Institutional Research
<b>LEGAL</b>		
Consent Orders, Court Orders, Judgments, Settlements	Until matter is resolved, plus 11 years	Office of the General Counsel
Legal Complaints	Until matter is resolved, plus 11 years if settlement agreement	Office of the General Counsel
Litigation Files (including Subpoenas)	11 years from termination of litigation, or from subpoena	Office of the General Counsel
Patents, Trademarks and Related Work Papers (original)	Permanent	Office of the General Counsel
Property Deeds, Easements, Licenses, Rights of Way, Leases of First Refusal, Remainder Interests, Mortgages; Property Records, including Acquisitions and Condemnation (original copy)	Permanent	Office of the General Counsel
FERPA Log of Requests for Access to Information from Education Records	Permanent	Office of the General Counsel
<b>SAFETY &amp; SECURITY</b>		
Crime Alerts	10 years	Campus Safety & Security
Crime Reporting – Documents Underlying and Required to Substantiate Federal Campus Crime Reports (Clery Act)	8 years	Campus Safety & Security
Day Logs	10 years	Campus Safety & Security
External Training Records	3 years from date of completion	Campus Safety & Security
Internal Investigations	10 years	Campus Safety & Security
Internal Training Records	Continuous for active employees; 3 years for inactive employees	Campus Safety & Security
Parking Records (receipts, permit applications, monthly vendor reports)	1 year	Campus Safety & Security
Schedules	2 years	Campus Safety & Security

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>SAFETY &amp; SECURITY (cont.)</b>		
Security Check-In Sheets	5 years	Campus Safety & Security
Suspension Notices	5 years	Campus Safety & Security
Unusual Incident Reports (UIR), not involving employee exposure to toxic or harmful substances	8 years	Campus Safety & Security
Use of Force	10 years	Campus Safety & Security
<b>SMALL BUSINESS DEVELOPMENT CENTER</b>		
Archived Client Files	11 years total	Small Business Development Center
Client Files (includes counseled clients and training sessions)	11 years	Small Business Development Center
Corporate/Administrative Records (financial records, supporting documents, statistical records and other records pertinent to this grant must be retained by the recipient and sub-recipients)	3 years from submission of the final financial report	Small Business Development Center
<b>STUDENT-RELATED</b>		
<b>Academic</b>		
Academic Misconduct Files (no suspension or dismissal resulting)	1 year from date of graduation or last date of attendance	Student Conduct
Academic Misconduct Files (suspension or dismissal resulting)	Permanent	Student Conduct
Acceptance Letters (for those who enroll)	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Add/Drop	1 year	Student Academic & Financial Services
Advanced Placement Records (for those who enroll)	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Advising Files	Current year, plus 1 year	Student Academic & Financial Services
Applications for Admission (for those who enroll)	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
A/R Records	11 years	Student Academic & Financial Services
A/R Statements (centrally generated)	Permanent	Student Academic & Financial Services
Audit / Credit/ No Credit Authorization	5 years	Student Academic & Financial Services

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>Academic (cont.)</b>		
Cash Receipts	5 years	Student Academic & Financial Services
Census Data from Faculty	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Change of Grade Forms	Permanent	Student Academic & Financial Services
Class Lists / Tallies (original and/or dean's roster)	Permanent	Student Academic & Financial Services
College / ACE Transcripts (prior) (for those who enroll)	Permanent	Student Academic & Financial Services
Course Offerings	Retain until obsolete, superseded or administrative value is lost	Student Academic & Financial Services
Credit Card Transactions	1 year	Student Academic & Financial Services
Credit by Examination (CLEP / Challenge) (for those who enroll)	Permanent	Student Academic & Financial Services
Distribution of FSA Program Funds (any documentation)	3 years from the end of the award year for which the aid was awarded or LDA, whichever is later	Student Academic & Financial Services
Enrollment Statistics (course level)	Permanent	Student Academic & Financial Services
Enrollment Verification	Permanent	Student Academic & Financial Services
Entrance Placement Exams and Score Reports (e.g., SAT / GRE)	5 years from date of graduation or last date of attendance for admitted students	Student Academic & Financial Services
Exchange J-1 Student Records	3 years	International Student Services
F-1 Student Records (F-1 Visas)	For full period of enrollment and then 1 year following DHS notification or 1 year following notification to INS that student is not pursuing full course of study or 3 years after student's last date of attendance, whichever is later	International Student Services



TYPE OF RECORD	RETENTION PERIOD	OFFICIAL REPOSITORY
<b>Academic (cont.)</b>		
Federal Family Education Loan Program and Direct Loan Program Records	<p>Records relating to a student or parent borrower's eligibility and participation must be retained for 3 years after the award year during which the student last attended the university.</p> <p>Other records relating to the university's participation in the FFEL or Direct Loan Program, including records of any other reports or forms, must be retained for 3 years after the award year in which the records are submitted</p>	Student Academic & Financial Services
Federal Perkins and Achievement Loan	3 years after loan is paid in full	Student Academic & Financial Services
Federal Student Aid Audits, Program Reviews and Investigations	If any Title IV loan, claim or expenditure is questioned by a Title IV program audit, program review, investigation or other review, the records must be maintained for the longer of the otherwise applicable required retention period (typically 3 years), or until the expenditure issue is resolved with the U.S. Department of Education	Student Academic & Financial Services
Federal Work Study	Records relating to administration of the program must be retained for 3 years after submission of the Fiscal Operations Report for the award year	Student Academic & Financial Services
Fee Assessment Forms	5 years from date of graduation or last date of attendance	Student Academic & Financial Services

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>Academic (cont.)</b>		
FERPA – Student’s Consent for Records Disclosure	Permanent	Student Academic & Financial Services
FERPA – Student Requests for Nondisclosure of Directory Information	Until request withdrawn by student; if request is not withdrawn, then permanent	Student Academic & Financial Services
Final Grades	Permanent	Student Academic & Financial Services
Financial Aid Records for Enrolled Students	3 years from the end of the award year for which the aid was awarded or last date attended, whichever is later	Student Academic & Financial Services
FISAP and Any Supporting Documentation (including program specific records)	3 years from the end of the award year in which the report was submitted (grant/loan reports); 3 years from end of award year in which student last attended (borrower records)	Student Academic & Financial Services
Graduation Applications	1 year after graduation	Student Academic & Financial Services
Graduation Lists	11 years	Student Academic & Financial Services
Home Schooling Documentation (for those who enroll)	Permanent	Student Academic & Financial Services
International Student Forms	For full period of enrollment, then 1 year following DHS notification	International Student Services
Leave of Absence/Withdrawal Authorizations	5 years from date of leave, withdrawal or transfer	Student Academic & Financial Services
Name Change Authorization	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
NSO Chapter Dues (payment receipts)	1 year	Student Academic & Financial Services
Readmission / Reinstatement Documentation	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Relevant Correspondence	1 year	Student Academic & Financial Services
Substitutions in Program Requirements	5 years from date of graduation or last date of attendance	Student Academic & Financial Services

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>Academic (cont.)</b>		
Supplemental Educational Opportunity Grant Programs	Records relating to administration of program must be retained for 3 years from the submission of the Fiscal Operations Report for the award year	Student Academic & Financial Services
Transcripts (JWU)	Permanent	Student Academic & Financial Services
Transcripts (high school)	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Transcript Requests	Permanent	Student Academic & Financial Services
Transfer Credit Evaluations	5 years from date of graduation or last date of attendance	Student Academic & Financial Services
Transfer Policy Guide (archived copies)	Permanent	Student Academic & Financial Services
Tuition and Fee Charges	Permanent	Student Academic & Financial Services
Tuition Refund/Letter of Credit, Requests for	11 years from graduation or last date of attendance	Student Academic & Financial Services
Veteran Administration Certifications	3 years from end of award year or last date of attendance	Student Academic & Financial Services

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>STUDENT AFFAIRS</b>		
<b>Athletics</b>		
EADA (Equity in Athletics Disclosure Act) Reports	Permanent	Athletics
Facility Usage Reports	5 years	Athletics
Fitness Center Log-in Sheets	5 years	Athletics
Game Programs	Permanent	Athletics
NAIA Eligibility Documents / Forms	2 years after separation from the university	Athletics
NCAA Eligibility Forms (student-athlete statement, drug consent form, affirmation of eligibility, international forms, etc.)	2 years after separation from the university	Athletics
News Releases / Clippings	Permanent	Athletics
Student, Faculty and Staff Medical Forms (fitness centers)	5 years	Athletics
Student Assistant / Work Study Info Sheet	1 year	Athletics
Student-Athlete Equipment Forms	5 years	Athletics
Student-Athlete Information Sheets	Permanent	Athletics
Student-Athlete Medical Information / History	7 years after graduation	Athletics
Student Participation Records	7 years	Athletics
Team Pictures and Team Statistics	Permanent	Athletics
Varsity Team Rosters	Permanent	Athletics
<b>Counseling Services</b>		
Behavioral Health Records	Providence Campus – 7 years after last professional contact with student	Counseling Services
	North Miami Campus - 7 years after last professional contact with student	
	Denver Campus - 7 years after last professional contact with student	
	Charlotte Campus – 11 years after last professional contact with student, if minor keep until age 30	
<b>Gender Equity Center (Providence Campus)</b>		
Staff and Volunteer Contact Information	1 year	Gender Equity Center

<b>TYPE OF RECORD</b>	<b>RETENTION PERIOD</b>	<b>OFFICIAL REPOSITORY</b>
<b>STUDENT AFFAIRS (cont.)</b>		
<b>Health Services</b>		
Student Health and Immunization Records	11 years from date of enrollment. If 17 or younger, until age 30	Health Services
<b>Intercultural Center (Providence Campus)</b>		
SA Applications	Permanent	Intercultural Center
Student Demographic Sheets	1 year	Intercultural Center
NCORE Scholarship Applications	1 year	Intercultural Center
<b>New Student Orientation</b>		
FYE Course Syllabi, Roster, Attendance, Assignments, Grades, Contact Information and Resources	1 year	New Student Orientation
Orientation Payment Records (non-student payments)	7 years	New Student Orientation
Orientation Registration Forms	5 years	New Student Orientation
<b>Residential Life</b>		
Confidential Contact Information for Missing Students	When a student is no longer a resident student or 5 years from the date the contact information was received, whichever is earlier	Residential Life
Daily Housing Status Change Reports	1 year	Residential Life
Early Arrival Requests	1 year	Residential Life
Hall Change Requests from Students	1 year	Residential Life
Housing Applications	1 year	Residential Life
Late Stay Requests	1 year	Residential Life
Room Condition Check List	1 year	Residential Life
Student Charge Summary (e.g., damage fees, etc.)	11 years	Residential Life
Student Data Sheet (hall sign-in information)	8 years	Residential Life
<b>Student Activities</b>		
Club and Organization - Constitution and Bylaws	Until superseded or outdated	Student Activities
Club and Organization – Registration	1 year	Student Activities
Club and Organization - Rosters	5 years	Student Activities
Electronic Record of Space Reservations in Resource25 (R25)	4 years	Student Activities

TYPE OF RECORD	RETENTION PERIOD	OFFICIAL REPOSITORY
<b>STUDENT AFFAIRS (cont.)</b>		
<b>Student Activities (cont.)</b>		
Event Files (key event communications, set-ups, agendas, meeting minutes)	1 year	Student Activities
Leadership Development Program Rosters	5 years	Student Activities
New Member Agreements	11 years	Student Activities
Prize Acknowledgement Form	11 years	Student Activities
<b>Student Conduct</b>		
Behavioral Misconduct Files (no suspension or dismissal resulting)	8 years from date of graduation or last date of attendance	Student Conduct
Behavioral Misconduct Files (suspension or dismissal resulting)	Permanent	Student Conduct

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## Who Should Read and Understand this Policy

All university employees.

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## Related Documents

[Family Educational Rights and Privacy Act \(FERPA\)](#)

[Legal Hold Policy](#)

[Written Information Security Policy \(WISP\)](#)

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## Contacts

- [General Counsel](#)
- [Policy Coordinator](#)

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Record Retention Policy

Originally Issued: August 2012

Last Updated: February 2014

Policy Owner: General Counsel

Executive Approvers: Chief Operating Officer and Board of Trustees