



## Retention of College Academic Records

Responsible Office: Office of the Vice President of Academic Affairs  
Responsible Administrator: Vice President for Academic Affairs and the Dean of the Faculty  
Effective Date: 06/30/2009  
Last Revision: 06/30/2009

Policy Sections:

### Scope

This policy provides guidelines for retention of College academic records; faculty personnel records (including search records), 3rd year reappointment and tenure records; student academic records (including thesis, examination, and term papers); international studies records; registrar records (including transcripts and graduation records); and faculty governance records. It applies to all College departments and offices and all College employees who create, receive, or maintain such records in the course of College business.

This policy does not address the retention of financial, student, admission, alumni, or corporate records, or any other area of operations outside the administration of the College's Academic Affairs Office. Consult the appropriate College office for further information about these areas.

### Reason for the Policy

This policy seeks to:

- Promote compliance with federal, state, and other legal requirements for record retention;
- Promote the efficient management, sharing, and transfer of information among authorized College staff within prescribed security standards;
- Effectively utilize limited office space for active records and utilize low-cost, remote storage space for inactive records;
- Dispose of records no longer needed to satisfy legal, regulatory, or other requirements;
- Ensure that no record is disposed of unless authorized;
- Ensure that the means of destruction is appropriate for the type of record under consideration;
- Ensure the preservation of records of permanent value; and
- Ensure that record retention policies, schedules, and procedures are reviewed and modified as necessary to respond to changes in technology or regulations.

## **Policy Statement**

The Vice President for Academic Affairs and Dean of the Faculty is responsible for setting the standards for retention and management of College academic records in collaboration with Directors within the Department. Such records must be retained for a period of time necessary to meet the operational, administrative, and legal requirements of the College and must then be destroyed according to established destruction schedules. The Record Retention Committee (see list of Committee members at the end of this Policy) manages the Records Program. An official retention and disposition schedule has been created. (See Table of Records Schedule attached.)

The College Librarian may determine that certain categories of academic records (e.g., faculty governance records) are of permanent value to the College and will arrange for appropriate storage of such records beyond their active period.

College records must be maintained in a manner that supports operational needs and internal control directives and must also meet federal, state, and regulatory requirements. Document retention standards and systems must ensure that transactions and related authorizations are fully supported in the event of an audit, litigation, or other external action.

For example, in accordance with federal and state mandates, faculty position application forms and materials must be maintained for **three (3) years** after the decision regarding the position was rendered. If a lawsuit is filed, materials must be maintained until the case is resolved. Designating a custodian of records generated by the Search Committee (see Appendix A "Search Records"), or the Third Year Reappointment or Term Committees, will help to ensure conformance with this Policy.

Departments must follow guidelines and standards issued by the College Librarian and the Vice President for Academic Affairs and Dean of the Faculty in support of this policy.

## **Definitions**

### **Active records**

Records needed to support the current activity of a department.

### **Inactive records**

Records for which the active period has passed, and which are being held for the remainder of the specified retention period.

### **Permanent (archival) records**

Records that have long-term or permanent value to the College, such as endowment indentures, College Bylaws, deeds, continuing agreements with external parties, and such similar documents.

### **Records custodian**

An individual assigned by a records manager to formally retain paper documents pursuant to established standards and systems.

### **Records manager**

An individual appointed by the responsible official to oversee the administration of records management systems (both paper and electronic) for an established academic process.

### **Records retention and disposition schedule**

An internal control document that indicates how records should be handled after the period of their active administrative use.

### **Responsible official**

A senior member of management who serves as the owner of institutional processes and, as such, is responsible for ensuring effective implementation of this policy in his/her assigned area of responsibility.

### **Retention period**

The minimum required length of time for which a department or central administrative office is responsible for the maintenance of records.

## **Policy Sections**

### **Administrative Responsibility**

The Vice President for Academic Affairs and Dean of the Faculty in accordance with the Table of Records Schedule is responsible for developing document retention policies and standards for academic records and for monitoring compliance with this policy and overseeing the quality, consistency, and effectiveness of the College's policies. The Vice President for Academic Affairs and Dean of the Faculty shall perform such functions in consultation with members of the College's Record Retention Committee<sup>1</sup> and may convene meetings of the Committee as appropriate.

The Vice President for Academic Affairs and Dean of the Faculty, in consultation with the Record Retention Committee shall:

1. Review recommended records retention schedules;
2. Establish appropriate filing standards for academic records;
3. Monitor disposition methods and practices;
4. Evaluate cost-effective short- and long-term storage options (including electronic media);  
and
5. Perform other records management oversight functions as required.

For each of the College's major academic processes, a **responsible official**, typically a senior member of management, serves as the institutional owner of the academic process and monitors the effective implementation of this policy in the related areas of responsibility. Listed in the attached Table of Records Schedule are the responsible officials for major College academic processes.

**Records managers**, who are appointed by each responsible official, directly supervise the develop of specific record retention schedules for their respective areas. Working with the Vice President for Academic Affairs and Dean of the Faculty, the records manager also supervises the implementation and quality assurance of records management systems and procedures for paper and electronic records stored in department academic offices.

The records manager in turn appoints one or more **records custodians** who are responsible for retaining record copies of documents according to established standards and systems.

**Note:** In the event that original or “record” copies of documents are maintained in department offices, the Chair of the Department must serve as the records custodian for those documents. The responsible individual must be able to locate paper documents required for quality assurance assessments, audits and other internal and external reviews at the request of the Vice President for Academic Affairs and Dean of the Faculty or other authorized individuals.

### **Ownership of Institutional Records**

College academic records are the property of the College and do not belong to those who prepare such records or to their official custodian. No employee has any personal or property right to academic records of the College, including those records that the employee helped develop or compile, and no employee may remove or copy such records for personal use.

### **Retention periods, Storage, and Disposition**

#### **Retention Periods**

Please refer to the Table of Records Schedule.

#### **Record retention Categories**

Records fall into one of the three record retention categories:

1. Archival records (permanent).
2. Non-permanent records requiring retention for legal or audit purposes; and
3. Routine administrative reports (that do not fall within the Table of Records Schedule).

#### **Storage Standards and Locations**

At the end of the active period, records must be labeled and stored for the balance of the retention period according to College guidelines and procedures.

The records custodian is responsible for appropriately labeling and arranging for suitable storage of inactive records. Arrangements for storage at designated facilities must be made through the Record Retention Committee. It may be acceptable to store inactive academic records at other official campus facilities or in the originating department, if suitable space is available that meets College standards.

Regardless of where inactive records are stored, the originating department is responsible for maintaining files or logs describing the contents of stored records, and for retrieving records upon official request. Consult record retention procedures for detailed guidelines.

## Disposition of Records

At the end of the appropriate retention period, inactive records, including transaction records, inactive agreements and other non-permanent and non-archival records, shall be destroyed according to the applicable schedule. The disposal process and methods should preserve the confidentiality of documents through the final point of disposition. Records containing personal and confidential information must be shredded or boxed and sent to the recycle center for disposal. The Record Retention Committee assists departments in arranging for confidential destruction of records. Non-confidential paper records may be put into recyclable containers.

If litigation is pending, threatened, or anticipated, records bearing on such litigation must not be destroyed except by permission of the College's Counsel. Similarly, documents under audit must not be destroyed. Counsel and officials notified of audit requirements will regularly update the Record Retention Committee with information about pending litigation or audits that require special attention.

## Accessibility of Records

Academic records must be easily retrievable for examination by authorized departmental and central administrators, auditors, and other authorized individuals. Records custodians must follow procedures for labeling and record-keeping to ensure that documents can be retrieved in a timely manner, and are responsible for retrieving records upon request.

Access to electronic records shall be subject to the College's policy governing information access and security (see, for example, Responsible Use of Union College Computing and Network Services, page 97 of the 2008-2009 Student Handbook). Records managers, in consultation with ITS professionals, are responsible for ensuring that electronic records are not rendered unusable because of changing technology or deterioration. Records in formats endangered by technology changes must be mitigated to other formats in order to maintain accessibility.

## Safeguarding Records

The records custodian is responsible for ensuring that active and inactive academic records are stored in a secure location. The storage location must provide appropriate confidentiality and protection from unauthorized inspection, theft, and physical damage due to a fire, water, or natural disaster. The records custodian must use sound judgment in restricting access to academic records, giving consideration to the degree of confidentiality warranted for such records.

Most permanent (archival) records must be transferred to the College Archivist following their active period for proper care and storage. Permanent records not sent to the College Archivist must be maintained in a fireproof container and access must be limited to authorized personnel.

## Records Related to Grants and Contracts

Records related to grants and contracts must be retained for a period of **three (3) years** from the date of the submission of the final financial report to the funding agency, unless the terms of the award specifically state otherwise, or if there is a pending audit or litigation matter.

Retention periods for such records vary widely depending upon the sponsoring agency and individual contract terms. For example, when the College accepts a federal grant or contract it enters into a binding agreement that requires it to apply federal disposition schedules to records

pertaining to such awards. However non-federal agencies may apply a different set of standards for record retention and in those cases it is best to refer to the agreement itself for retention requirements. In any case where the sponsoring agency's retention period is longer than that dictated by College policy, the longer period shall apply.

Departments and academic support centers are strongly encouraged to consult College Relations to determine the appropriate retention period for records related to specified grants or contracts. Prior to destruction, department administrators must consult College Relations to ensure that the records are not related to pending audits or litigation.

### Special Situations and Exceptions

Exceptions to this policy must be approved by the Vice President for Academic Affairs and Dean of the Faculty.

### Related Information

Policy

Record Retention Committee website

### Contacts

Subject	Contact	Phone
Legal retention requirements or pending litigation	Counsel (Charles J. Assini, Jr., Esq.)	518-374-3399
Search	Search Committee Chair – contact Dean of Academic Departments for name of Chair (David Hayes)	518-388-6358
3rd year reappointment and tenure	Vice President for Academic Affairs and Dean of the Faculty (Therese McCarty)	518-388-6102
Faculty governance records	Vice President for Academic Affairs and Dean of the Faculty (Therese McCarty)	518-388-6102
Faculty personnel records	Associate Dean for Academic Affairs (Nic Zarrelli)	518-388-6033
	Director of Human Resources (Eric Noll)	518-388-6108
Student academic records	Dean of Studies (Kristin Bidoshi, interim)	518-388-6234
Transcripts, graduation records	Registrar (Penny Adey)	518-388-6109
Interpretation of policy, destruction of records	Vice President for Academic Affairs and Dean of the Faculty (Therese McCarty)	518-388-6102
Storage arrangements, disposal of records	Record Retention Committee	518-388-6103

## Roles and Responsibilities

### Vice President for Academic Affairs and Dean of the Faculty

Establishes policies and standards for retention of academic records, ensures compliance with this policy, and oversees the quality, consistency, and effectiveness of the College's academic records in consultation with the College's Record Retention Committee.

### Record Retention Committee

Provides guidance to the Vice President for Academic Affairs and Dean of the Faculty in ensuring compliance with this policy and in overseeing the quality, consistency, and effectiveness of the College's academic records management systems.

### Counsel

Provides guidance to the College community regarding the legal requirements for the retention and destruction of records, particularly in those areas where litigation is pending, threatened, or possible, and shall review proposals for electronic retention in place of originals.

### College Librarian

Sets standards for the College's Archival Policy.

### Records Custodian

Retains academic records according to College policies and procedures and for ensuring that such records are retrievable upon authorized request, as outlined in this policy.

### Records Manager

Implements this policy as it relates to his or her area(s) of responsibility in accordance with the duties outlined in this policy.

### Responsible Official

Monitors the effective implementation of this policy for the specific academic records areas for which he or she is assigned ownership. The responsible official shall appoint one or more records managers to implement the record retention policy at the departmental level.

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#### <sup>1</sup> Members of Record Retention Committee (May 2009)

Assistant to the President	Kathy Quinn
Chief Information Officer, ITS	Dave Cossey
Dean of Studies	Kristin Bidoshi
Director of Admissions Systems	Joyce Brace
Director of Campus Safety (Interim)	Chris Hayen
Librarian, College	Thomas McFadden
Librarian, Head of Special Collections	Ellen Fladger
Registrar	Penny Adey
Secretary, College Relations	Elizabeth Seber
Senior Director of Financial Services	Judy Manchester
Vice President for Academic Affairs & Dean of the Faculty	Therese McCarty
Vice President for Student Affairs & Dean of Students	Stephen Leavitt