



Retention of College Student Records (non-academic)

Responsible Office: Dean of Students Office
Responsible Administrator: Vice President for Student Affairs and Dean of Students
Effective Date: 06/30/2009
Last Revision: 06/30/2009

Policy Sections:

Scope

This policy provides guidelines for retention of Campus Safety incident reports and student records (non-academic, including international student records, health records, counseling records, recruiter records, and student organization administration 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, academic, admission, alumni, or corporate records, or any other area of operations outside the College's Dean of Student's Office administration. 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 Student Affairs and Dean of Students is responsible for setting the standards for retention and management of College student records (non-academic) in collaboration with Directors within the Dean of Students Office. 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.)

Most student records (non-academic) are non-archival. However, the College Librarian may determine that certain categories of student records (non-academic) 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. For example, Family Education Rights and Privacy Act "FERPA" provides students the right to inspect their records. 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.

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

Definitions

Active records

Records needed to support the current activity of a department, division, support center, or institutional office.

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 Dean of Students Office 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 Student Affairs and Dean of Students in accordance with the Table of Records Schedule is responsible for developing document retention policies and standards for monitoring compliance with this policy and overseeing the quality, consistency, and effectiveness of the policy. The Vice President for Student Affairs and Dean of Students shall perform such functions in consultation with members of the College's Record Retention Committee¹ and may convene meetings of the Committee as appropriate.

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

1. Review recommended records retention schedules;
2. Establish appropriate filing standards for student 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 Dean of Students Office major student service areas, a **responsible official**, typically a senior member of the Dean of Students Office, serves as the institutional owner of the 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 student services 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 Student Affairs and Dean of Students, 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 Student Affairs and Dean of Students or other authorized individuals.

Ownership of Institutional Records

College student records (non-academic) 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 student records (non-academic) 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

Student record schedules are primarily attendance-driven; that is, the retention period begins on the first day of the Academic Year that the records were created.

The retention period for counseling and health records are governed by applicable New York State laws, rules, and regulations.

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 student records (non-academic) 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 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

Student records (non-academic) must be easily retrievable for examination by students, College officials with a legitimate educational interest in the student record, 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 student records (non-academic) 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 student records (non-academic), 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.

Special Situations and Exceptions

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

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
Student disciplinary	Senior Associate Dean of Students-Residential Life (Trish Williams)	518-388-6116 518-388-6061
International student	Director of Student Support Services (Shelly Shinebarger)	518-388-8785
Services to Students with Disabilities		
Student organization administration	Director of Student Activities and Reamer Campus Center (Matt Milless)	518-388-6118
Residential contracts	Director of Residential Life (Molly MacElroy)	518-388-6117
Student health	Director of Health Services (Sharron McCullough)	518-388-6120
Counseling and psychological cases	Director of Counseling Center (Marcus Hotaling)	518-388-6161
Campus Safety	Director of Campus Safety (Chris Hayen)	518-388-6358
	Information Systems Specialist, Campus Safety (Janice Underwood)	518-388-6351
Interpretation of policy, destruction of records	Vice President for Student Affairs and Dean of Students (Steve Leavitt)	518-338-6116
Storage arrangements, disposal of records	Record Retention Committee	518-388-6103

Roles and Responsibilities

Vice President for Student Affairs and Dean of Students

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

Record Retention Committee

Provides guidance to the Vice President for Student Affairs and Dean of Students in ensuring compliance with this policy and in overseeing the quality, consistency, and effectiveness of the College's student records (non-academic) 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 student records (non-academic) 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 process 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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¹ 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