

RECORD RETENTION POLICY

Introduction

Adler University and various Federal, Provincial, and State laws require that different types of records be retained for specific periods of time, and that records are destroyed in an appropriate time and manner.

Adler University is committed to effective record retention to meet legal standards, minimize cost, optimize the use of space, and ensure that outdated and useless records are destroyed. This policy applies to all records, whether maintained in hard (paper) copy, electronically, or in some other fashion. These guidelines pertain to all records generated by employees and staff of Adler University.

Disposal and Destruction of Records

Documents should be retained as long as they are needed for the full duration of their retention period, unless directed otherwise by the Registrar or University Counsel. Records should be deleted/destroyed in ways commensurate with their confidentiality and with methods which do not permit recovery, reconstruction or future use of confidential information. By example:

Paper records containing confidential information (such as personally identifiable information) should be shredded, not placed in recycle bins and not simply thrown out with other classes of records or with miscellaneous trash.

Electronic or machine-readable records containing confidential information should be deleted/destroyed through thorough 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, not simply thrown away. It is possible to overwrite audio and videotapes with other, non-confidential sound and images, but if this is done, it is recommended that it be done by an authorized member of the staff in the office that originated the records.

Electronic records and other electronic communications have the same retention periods as tangible records. As such, e-mail should be handled as any other Record in terms of retention and disposal.

Records for which there is no retention requirement in the Retention Schedule should be deleted/destroyed promptly unless there is a business, institutional, historical or legal reason to retain or preserve the records.



Responsibility

No one person or unit can be directly responsible for all University Records. Every office or department managing University records is responsible for:

- Implementing records management practices consistent with this policy.
- Educating staff in records management practices.
- Preserving records as required under this policy.
- Properly disposing of Inactive Records at the end of the applicable retention period.
- Protecting Records against misuse, misplacement, damage, destruction, or theft.
- Monitoring compliance with this Policy.

University Records are the property of the University and not of the officers, faculty members, or employees who create them or to whom they are entrusted. University records should not be removed from the University without prior approval.

Retention Period

Admission Records for Applicants Who Do Not Enroll	
Letters/Correspondence	1 year
Application Materials	1 year
International Student Documents	1 year

Admissions Records for Applications Who Enroll	
Letters/Correspondence	3 years after last term
Application	1 year after first term
All other admission documents	3 years after last term
International Student Documents	3 years after last term
Evaluation of transfer credit	3 years after last term

Academic Records	
Academic Alerts	3 years after last term
Academic Warnings	3 years after last term
Academic Probation	3 years after last term
SDC Referral	Permanent
SDC Notes	Permanent
SDC Decisions	Permanent
SCEC Referral	Permanent
SCEC Notes	Permanent
SCEC Decisions	Permanent
Correspondence	3 years after last term
Student Complaints	Permanent
Leave of Absence	Permanent
PsyD Annual Student Review	Until administrative need satisfied
Dissertation	Permanent
Transcript	Permanent

Degree and Certificate Records	
Degree Audits	3 years after last term
Graduation Lists	Permanent
Degree substitution/waivers	Permanent

Grades	
Exams	1 year after course completion
Grade appeal	1 year after course completion
Incomplete request	1 year after course completion
Midterm grades	End of term

Grade submission sheets/data	Permanent
Student Evaluations	3 years after course completion

Student Service Records	
Name Change	1 year after last term
Race/ethnicity data	Permanent
Change of address	1 year after last term
Class schedules	Permanent
Withdrawal request	1 year after last term
Financial Aid	4 years after last term
IPEDS Reports	3 years after submission
Graduation Application	1 year after graduation

Institutional Records	
Contracts	4 years after expiration
Leases	6 years after expiration
Accounts receivable	4 years from creation
Accounts payable	4 years from creation
Catalogs	Permanent
Handbooks (Student, Employee)	Permanent
Annual campus crime reports	4 years from reporting
Alumni gift records	7 years
Building plans	Permanent
Record of repairs	7 years
Legal settlements	Permanent
Purchase orders	7 years



Human Resources	
General HR Information Job Descriptions, Faculty and Staff Handbook etc.	Permanent
Hiring Documents/Personnel Files	3 years
Payroll Records and Summaries	7 years
Termination documents	Permanent
I-9 Forms	3 years after hire or 1 year after termination, whichever is later
Affirmative Action/EEO	
Affirmative Action Plan	Retain plan for current year plus prior year
EEO-1	Most recently filed report
VETS 100/100A Form	3 years
Medical Information	
Insurance Information	1 year; 2 years ¹
HIPAA privacy documentation (training, complaint investigations, accountings, privacy policy and procedures)	6 years
Pension Information	
ERISA Plan descriptions/summary annual reports	6 years (all records pertinent to covered plans)
Pension payments/records	3 years after death
Pension plan documents; service/eligibility records	Permanent



Corporate/Business Records	
Accounts payable and receivable ledgers & schedules	7 years
Audit Reports	Permanently
Bank reconciliations	2 years
Bank statements	3 years
Contracts, mortgages, notes, & leases (expired)	7 years
Contracts, mortgages, notes, & leases (still in effect)	Permanently
Deeds, mortgages, & bills of sale	Permanently
Financial statements (year-end, other optional)	Permanently
Insurance policies (expired)	3 years
Invoices (to customers, from vendors)	7 years
Minute books of directors, stockholders, bylaws, and charter	Permanently
Tax returns & worksheets, revenue agents' reports, and other documents relating to determination of income tax liability	Permanently
Trademark registrations and copyrights	Permanently

Litigation

All Records concerning threatened, ongoing or pending audits or lawsuits (including reasonably anticipated lawsuits) should not be destroyed, damaged, or altered, even if the records retention date has expired, until the matter has been resolved and you have been specifically advised in writing by the University Counsel that such Records may be destroyed. If you have reason to believe that a Record scheduled for destruction may pertain to any of these matters, do not destroy the Record and contact the University Counsel.

If you have any questions about your responsibilities or the confidentiality of documents, please contact the University Counsel.