



COMMONWEALTH UNIVERSITY OF PENNSYLVANIA

## **Interim Records Retention Standard**

### **Commonwealth University of Pennsylvania**

Responsible Areas: Academic Affairs, Administration, Advancement, Enrollment Management and Student Affairs, Fiscal Affairs, Institutional Effectiveness and various subunits

Revised: December 2024

### **1. Purpose**

This standard addresses records management practices. This standard requires different types of records to be retained for specific periods of time and have designated official repositories for the maintenance of records. These records must be managed according to procedures that are outlined in this document in support of the university's commitment to effective records retention to preserve institutional history, meet legal standards, optimize the use of space, minimize the cost of records retention, and ensure that outdated and useless records are destroyed.

### **2. Responsibilities for Managing Records**

- 2.1 Each division/unit is responsible for establishing appropriate records retention management practices and ensure the practices are consistent with the Office of the Chancellor PASSHE Number 2010-603 Policy on Records Retention and Disposition, and other regulatory, legal, administrative, and external agency requirements, etc. Divisions and units should:
  - 2.1.1 Implement the division's/unit's records management practices.
  - 2.1.2 Ensure that these management practices are consistent with the PASSHE policy.
  - 2.1.3 Educate staff within the division/unit in understanding sound records management practices.
  - 2.1.4 Ensure that access to confidential files is restricted.
  - 2.1.5 Preserve records of historic value and transfer those records to the university archives. Long-term restrictions on access to selected archival records should be negotiated at the time of their transfer to the university archives.
  - 2.1.6 Destroy records that are beyond the retention period and have no archival value upon passage of the applicable retention period.

### 3. Preserving or Disposing of Records

- 3.1 When the prescribed retention period for official records in Table 1 has passed, a determination of whether to preserve or dispose of the documents must be made.
  - 3.1.1 Transitory records include emails that are temporary and convey information of temporary importance. Examples include invitations to meetings and replies.
  - 3.1.2 Emails that convey official information including decisions should be preserved as records under this policy.
  - 3.1.3 To decide if the record has historic value, the unit can consult with the university archivist, but the final decision resides with the manager of the unit responsible for the records.
  - 3.1.4 Records determined to have historical value will be stored in accordance with PRP 2200 - Records Management Policy for Historic University Records.
  - 3.1.5 Records marked for disposal will be destroyed in one of the following ways:
    - 3.1.5.1 Recycle non-confidential paper records;
    - 3.1.5.2 Shred or otherwise render unreadable confidential records; or
    - 3.1.5.3 Erase or destroy electronically stored data.

### 4. Records Location and Duration

- 4.1 Table 1 lists the official repositories for various types of records as well as the length of time these records must be retained in accordance with PASSHE Policy Number 2010-603 Policy on Records Retention and Disposition, statute, regulation, etc.
  - 4.1.1. Records retention time periods are listed in Table 1
  - 4.1.2 Records retention time periods may be modified by statute, regulation, judicial or administrative order, contract, pending litigation, accreditation or licensure requirements, audit requirements, or administrative directive. These sources or modifications to them supersede the requirements listed in this standard if they differ.

**Table 1: Records, Repositories, and Retention Time Period**

| Type of Record   | Official Repository(ies)        | Retention Period -Years                    |
|--|---------------------------------|--|
| <b>General Correspondence, Reports, Agreements</b>   |                                 |  |
| Correspondence and General Administration (email correspondence does not fall under this standard) | Respective Division             | 7  |
| Reports to External Agencies or Groups   | Respective Division - Submitter | Permanent                                  |
| Third-Party Provider Agreements (e.g., letters of understanding, memoranda of                      | Respective Division             | 1 year past the active length of agreement |

| Type of Record  | Official Repository(ies)        | Retention Period -Years  |
|---|---------------------------------|--|
| understanding, affiliation agreements, articulation agreements, contract for services, and other types of arrangements) |                                 |  |
| Special Project and Task Force Reports  | Respective Division             | 4 unless otherwise designated  |
| <b>Academic Affairs</b>   |                                 |  |
| Student Academic Issues, Complaints, Grievances   | Provost's Office                | 3  |
| Program Review Reports  | Provost's Office                | 10   |
| Approved Academic Programs  | Provost's Office                | Permanent  |
| Academic Policy Proposals   | Provost's Office                | Until Completed  |
| Approved Academic Policies  | Provost's Office                | 5  |
| Research Reports  | Research and Sponsored Programs | 10   |
| Grant Materials   | Research and Sponsored Programs | Records should be maintained for 5 years from the date the Grantee submits its final expenditure report. For grants that have continuing expenditure submissions, the date the last expenditure report is submitted constitutes the starting point for the retention period. |
| Non-Funded Grant  | Research and Sponsored Programs | 6 Months   |
| Criminal Background Checks, students  | Academic Department             | 3 from student's completion of program   |
| Curriculum Requirement Adjustment Denials   | Academic Department             | 6  |
| Independent Study Forms, completed  | Academic Department             | 2 from student's completion of program   |
| Internship Denials  | Academic Department             | 2 from student's completion of program   |
| Letters of Recommendation, student  | Academic Department             | 2 from student's completion of program   |
| Student Clinical Evaluations  | Program Administrator           | Permanent  |
| Student Medical Records (Nursing)   | Program Administrator           | 3 from student's completion of program   |
| Student Listings  | Registrar                       | 5  |
| Student Data in Student Information System  | Registrar                       | Permanent  |

| Type of Record  | Official Repository(ies) | Retention Period -Years  |
|---|--------------------------|--|
| Academic Actions (Dismissal, etc.)  | Registrar                | 5 from graduation or date of last attendance   |
| Academic Records (including narrative evaluations, competency assessments, etc.)                            | Registrar                | Permanent  |
| Change of Course Forms, completed -Continuing Education, Summer Sessions, Extramural Studies                | Registrar                | 5 from date of enrollment  |
| Change of Grade Forms, completed  | Registrar                | Permanent  |
| Change to Student ID number   | Registrar                | Permanent  |
| Class Roster of Student Names   | Registrar                | Permanent  |
| Confidentiality Hold Forms, completed   | Registrar                | Permanent or until student rescinds in writing   |
| Curriculum Change Authorizations  | Registrar                | 5 from graduation or date of last attendance   |
| Degree, Grade, Enrollment, and Racial/Ethnic Statistics   | Registrar                | Permanent  |
| Enrollment Verifications  | Registrar                | 1 from enrollment date   |
| Grade Sheets  | Registrar                | Permanent  |
| Graduation Lists  | Registrar                | Permanent  |
| Hold or Encumbrance Authorizations  | Registrar                | Until Released   |
| Name Changes  | Registrar                | Permanent  |
| Original Grade Sheets   | Registrar                | Permanent  |
| Reinstatement Records   | Registrar                | Permanent  |
| Services (Immigration Records only)   | Global Engagement Office | Permanent  |
| Counseling Patient Records (Regulatory)   | Counseling Center        | 7 from the last date of service  |
| <b>Administration</b>   |                          |  |
| EEO – 6/IPEDS   | Human Resources          | 5  |
| Official Employee Personnel Files (including application, resume, appointment, salary changes/salary forms) | Human Resources          | To age 75 or 4 years from date last employed, whichever is earlier<br>29 C.F.R. §516.5                   |
| Individual Contracts of Employment  | Human Resources          | Maintain in Official Personnel File (To age 75 or 4 years from date last employed, whichever is earlier) |
| I-9 Forms (Faculty and Staff)   | Human Resources          | 3 years after date of hire, or 1 year after termination (whichever is later) 8 C.F.R. §372a.2            |

| <b>Type of Record</b>  | <b>Official Repository(ies)</b>   | <b>Retention Period -Years</b>  |
|--|-----------------------------------|---|
| I-9 Forms (Students)   | Human Resources                   | 3 years after date of hire, or 1 year after termination (whichever is later)  |
| Report of Occupational Injury or Illness and Workers' Compensation Claims and Supporting Documents                       | Human Resources                   | Maintain in Official Personnel File (To age 75 or 4 years from date last employed, whichever is earlier)                              |
| Performance Appraisals   | Human Resources                   | Maintain in Official Personnel file (3 most recent years)   |
| Search Records, including employment applications, resumes, and all applicant search materials                           | Human Resources                   | 2 years 29 C.F.R. §1627.3 application becomes part of Official Personnel Files  |
| Background Checks  | Human Resources                   | To age 75, or 4 years from date last employed, whichever is earlier (maintain separate from Official Personnel File) 42 Pa.C.S. §5533 |
| Family Medical Leave Act Case Files and Other Medical Documentation for Leave Requests                                   | Human Resources – Shared Services | 3 years after case closed or duration of leave (maintain separate from Official Personnel File)                                       |
| H-1 Visa Scholar Records (temporary employment of internationals under Immigration & Naturalization Service regulations) | Human Resources                   | 6 year after expiration of VISA   |
| J-1 Visa Scholar Records (non-immigrant internal scholars, i.e., visiting faculty)                                       | Human Resources                   | 3 years after expiration of VISA  |
| Employee Work-related Medical Records  | Human Resources                   | For hazard exposure 30 year after employee separation; for all other medical records 3 years after                                    |
| <b>Enrollment Management and Student Affairs</b>   |                                   |   |
| International Student Forms (Visa documentation, etc.)   | Graduate Admissions               | 5 from start of application term  |
| Letters of Recommendation  | Graduate Admissions               | 5 from start date of application term   |
| Miller Analogies Test, GRE Test Scores (except for those in a student's academic record, which is permanent)             | Graduate Admissions               | 5 from start date of application term   |
| Student Waivers for Right of Access to Letters of  | Graduate Admissions               | 5 from start of application term  |

| Type of Record  | Official Repository(ies) | Retention Period -Years   |
|---|--------------------------|---|
| Recommendation or other Materials   |                          |   |
| Transcripts (High School and Other College)   | Graduate Admissions      | 5 from start of application term  |
| Advanced Placement, Applications for Admission, Relevant Correspondence, Entrance Exam Reports (ACT, CEEB, et. al.), Residency Classification Forms, Letters of Recommendation, Transcripts – High School and Other College (except for those in a student’s academic record, which is permanent) | Undergraduate Admissions | 3 from start date of application term   |
| International Student Forms, completed (Visa documentation, etc.)   | Undergraduate Admissions | 3 from start date of application term   |
| Letters of Recommendation   | Undergraduate Admissions | 3 from start date of application term   |
| Residency Certificates  | Undergraduate Admissions | 3 from start date of application term   |
| Residence Change Documents (Non-resident to Resident)   | Undergraduate Admissions | 3 from start date of application term   |
| Student Waivers for Right of Access (See Letters of Recommendation for Admission)   | Undergraduate Admissions | 3 from start date of application term   |
| Transcripts (High School and Other College) (except for those in a student’s academic record, which is permanent)   | Undergraduate Admissions | 3 from start date of application term   |
| Student Non-academic Issues, Complaints, Grievances   | Dean of Students         | 3   |
| Student Health Records  | Health Centers Clinics   | 7   |
| Student Loan Records  | Financial Aid            | 3 after PIF, assigned or cancelled  |
| Federal student aid program records   | Financial Aid            | 3 from end of award year  |
| Federal Perkins records   | Financial Aid            | 3 from date that loan was assigned to U.S. Dept. of Education, cancelled, or repaid |
| Veteran Administration Certifications   | Military Affairs         | 5 from graduation or date of last attendance  |
| Damage Records (including pictures)   | Student Life & Housing   | 7 from term of occupancy  |
| Emergency Cards   | Student Life & Housing   | 1   |

| <b>Type of Record</b>  | <b>Official Repository(ies)</b>     | <b>Retention Period -Years</b>   |
|--|-------------------------------------|--|
| Housing Agreements   | Student Life & Housing              | 7 from term of occupancy   |
| <b>Facilities</b>  |                                     |  |
| Construction As-Built Drawings   | Facilities                          | As long as the design represents existing conditions   |
| Environmental Site Assessment for CU Property  | Facilities                          | Life of ownership  |
| Licenses, Rights of Way, Leases, Rights of First Refusal, Remainder Interests for CU           | Facilities                          | Life of contract + 3 years   |
| Property Deeds and Easements for CU  | Facilities                          | File with State Archives   |
| Title Insurance Policies for CU  | Facilities                          | Life of Contract + 3   |
| <b>Fiscal Affairs</b>  |                                     |  |
| Hold or Encumbrance Authorizations   | Student Accounts                    | Until Released   |
| Student tuition and fee data, online   | Student Accounts                    | Indefinite   |
| Tuition and Fee Charges, if account has zero balance   | Student Accounts                    | 2 fiscal, with no activity   |
| Tuition Rate Schedules   | Budget Office                       | 6 (at university level)  |
| Comprehensive Planning Process Narrative and Workbook  | Budget Office                       | 5  |
| Dining Plan Agreements   | Auxiliaries                         | 7 from term of occupancy   |
| <b>Institutional Effectiveness</b>   |                                     |  |
| Accreditation Reports and Documents  | Institutional Effectiveness         | Permanent  |
| Official Data Files  | Institutional Effectiveness         | Permanent  |
| <b>Procurement/Construction Support</b>  |                                     |  |
| Correspondence, Including Emails, Related to Bid Process Up Through Award                      | Procurement or Construction Support | 1 year after award of contract   |
| Procurements Made Under Sections:<br>514 (Small)<br>515 (Sole Source)<br>516 (Emergency)       | Procurement or Construction Support | Record listing of contracts for 3 years past date of final payment to include contractor's name, amount and type of contract, and list of supplies/services procured |
| Purchase Orders, Contracts, and Agreements, e.g., Letters and Memorandums of Understanding     | Procurement or Construction Support | 3 years after final payment (reference §§563 and 564)  |
| Successful Bidder/Proposer Information for Requests for Proposals/Quotes, Invitations for Bids | Procurement or Construction Support | 3 years after final payment (kept with contract; reference §§563 and 564)  |

| Type of Record   | Official Repository(ies)            | Retention Period -Years |
|--|-------------------------------------|-------------------------|
| Unsuccessful Bidder/Proposer Information for Requests for Proposals/Quotes, Invitations for Bids | Procurement or Construction Support | 6 months                |

## 5. Additional Information

### 5.1. Supporting Documents

- 5.1.1 PRP 2200 - Records Management Policy for Historic University Records
- 5.1.2 Office of the Chancellor Policy Number 2010-603 Policy on Records Retention and Disposition

### 5.2 Standard History

- 5.2.1 Standard History: Issued as a new standard
- 5.2.2 Standard Effective Date: N/A

### 5.3. Responsible Office and Contact

- 5.3.1 Responsible Office: Office of the Institutional Effectiveness
- 5.3.2 Standard Approved by:
- 5.3.3 Contact Information:
- 5.3.4 Email: OIE@commonwealthu.edu
- 5.3.5 Telephone: 570-389-4098