



COMMONWEALTH UNIVERSITY OF PENNSYLVANIA

Records Retention Standard

Policy 2-05A 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history, meet legal standards, optimize the use of space, minimize the cost of records retention, and ensure that outdated and useless records are destroyed.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
General Correspondence, Reports, Agreements		
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
Academic Affairs		
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
Administration		
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 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

Type of Record	Official Repository(ies)	Retention Period -Years
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
Enrollment Management and Student Affairs		
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

Type of Record	Official Repository(ies)	Retention Period -Years
Housing Agreements	Student Life & Housing	7 from term of occupancy
Facilities		
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
Fiscal Affairs		
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
Institutional Effectiveness		
Accreditation Reports and Documents	Institutional Effectiveness	Permanent
Official Data Files	Institutional Effectiveness	Permanent
Procurement/Construction Support		
Correspondence, Including Emails, Related to Bid Process Up Through Award	Procurement or Construction Support	1 year after award of contract
Procurements Made Under Sections: 514 (Small) 515 (Sole Source) 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