



RECORDS MANAGEMENT POLICY

SCOPE

This policy applies to all university operations.

POLICY STATEMENT

This Records Management Policy is intended to ensure the preservation and accessibility of records for as long as they are needed; ensure the authenticity, reliability, integrity, and usability of records; ensure that records that are no longer needed or of no value are destroyed at the appropriate time; and ensure compliance with institutional policy and applicable state and federal laws and regulations.

DEFINITIONS

University Record: Any recorded information that is created or received in the ordinary course of University business. All University Records regardless of their format (e.g., hardcopy or electronic) are subject to this Policy.

Inactive Record: A University Record that is no longer being used in the ordinary course of University business that must be retained until the end of its Record Retention Period and is not required to be preserved in accordance with a Litigation Hold Notice.

Expired Record: A University Record that (i) that is no longer being used in the ordinary course of University business; (ii) is not listed under the Record Retention Schedule or whose Record Retention Period has ended; (iii) that is not subject to a Litigation Hold Notice; and (iv) that is not a Historical Record.

Record Retention Schedule: The table listing the required Record Retention Period and the designated Custodian of Record for each identified University Record.

Custodian of Record: The designated department or office, as identified in the Record Retention Schedule, responsible for retaining and timely destroying of University Records in compliance with this Policy.

POLICY

A. University Records Retention

The University will retain maintain records in accordance with the Record Retention Schedule and this Policy. Expired Records will be destroyed in accordance with this Policy.

If a record fits within two categories, each having a different retention period, the longer period governs. In order to facilitate compliance with this Policy, all Record Retention Periods expiring during a calendar year may be extended to the last day of such calendar year. Thus, all University Records expiring during a calendar year should be destroyed on the last day of that calendar year.

B. Retention Practices

University Records must be retained by the Custodian of Record in the following manner:

1. Hardcopies are to be retained in hardcopy form unless converted to electronic format in a University centrally managed system
2. Electronic records, such as e-mails, pdfs, and other electronic documents that are not retained in a University centrally managed system (e.g., Microsoft Exchange, Orbund Einstein) should be printed in hard copy form in a manner that preserves their original content and form
3. Electronic records stored within a University centrally managed system (e.g., Orbund Einstein, Salesforce, etc.) must comply with the requirements of this policy. The Custodian of Record is responsible for contacting and consulting with the Director of Information Technology to ensure such compliance
4. Only originals of Inactive Records should be kept. All copies and drafts should be destroyed.

C. Security and Confidential Information

Many University Records contain confidential information which is protected by University policies and procedures, as well as state and federal laws and regulations including but not limited to the Family Educational Rights and Privacy Act ("FERPA"), the Health Insurance Portability and Accountability Act ("HIPAA"), the Gramm-Leach-Bliley Act, and the Fair and Accurate Credit Transactions Act of 2003. This Policy shall be implemented in a manner consistent with all such policies, procedures, laws and regulations, as those may be amended from time to time.

D. Destruction of Expired Records

If the Custodian of Record believes that an Expired Record has historical value and should be permanently retained as a Historical Record, the University Archives Department should be consulted. Otherwise, all other Expired Records must be destroyed by the Custodian of Record in the following manner:

1. Hardcopy Destruction

Expired Records in hardcopy form that do not contain confidential information should be recycled. Expired Records in hardcopy form that do contain confidential information should be shredded in a manner that renders them unreadable and that would prevent them from being reconstructed. Security of the Expired Records should be maintained until proper destruction is performed.

2. Electronic Records

E-mails and other electronic documents (e.g., Word Documents, Excel, and PDFs) should be deleted.

The Custodian of Record is responsible for contacting and consulting with the IT Office to ensure that Expired Records contained in a University centrally managed system are properly destroyed.

Devices or other media that store electronic records (e.g., USB drives, etc.) should be destroyed in a manner consistent with media sanitization methods which include disintegration, incineration, pulverization or melting. The type of sanitization required will depend on the type of device as well as the nature of the information contained in the device. Such destruction methods require trained professionals and should be conducted by authorized personnel. The IT Office and the University's designated off-site storage facility currently provide such services. Consult the IT Office or the University's designated off-site storage facility to arrange for such destruction.

E. Copies of Records

Faculty and staff that are not the designated Custodian of Record for an identified University Record are expected

to only retain copies and drafts of such University Record to the extent necessary to conduct University business. Such faculty and staff must destroy such copies/drafts once they are no longer needed to conduct University business unless subject to a Litigation Hold Notice.

F. Litigation Hold Notices

All University Records are subject to litigation discovery. If there is any reason to believe that a claim may be asserted against the University for which any University Records may be relevant, such records must not be destroyed.

G. Permanent Protection of Education Records

If the University discontinues operations, educational records will be provided to the Washington Student Achievement Council in compliance with RCW 28B.85.130 - Educational records—Permanent file—Protection, which states that “If any degree-granting institution discontinues its operation, the chief administrative officer of the institution shall file with the council the original or legible true copies of all educational records required by the council. If the council determines that any educational records are in danger of being made unavailable to the council, the council may seek a court order to protect and if necessary take possession of the records. The council shall cause to be maintained a permanent file of educational records coming into its possession.”

H. Record Retention Schedule

1. Governance

Title	Description	Custodian of Record	Primary Retention	Disposition
Accreditation Working Papers	Materials used to create accreditation reports. Does not include final accreditation reports or review.	President	7 years after accreditation received	Destroy
Accreditation Reporting	Final report submitted to an accrediting body by the university or, in cases where an academic unit has additional accreditation requirements, by an academic unit. Does not include working papers or materials gathered to create final report.	President	7 years after accreditation received	Destroy
Program or Curriculum Advisory Body Records	Records that document the role of professional or other advisory groups in evaluating or providing feedback and direction to programs and/or about curriculum. May include correspondence, meeting	Education Director	6 years after calendar year	Transfer to Archives

	records, reports, and studies.			
Complaints and Grievances – Exonerated	Records relating to complaints and grievances filed in cases of affirmative action, discrimination, equal opportunity employment, harassment issues, and academic issues in which the complaint/grievance proved to be unsubstantiated. May be filed by students, job applicants, the public, and represented and non-represented state employees. May include: filed complaints and grievances; supporting documentation; unit or university responses and decisions; legal actions, arbitration or mediation efforts; determinations and appeals. Excludes records covered by Complaints and Grievances -- Upheld	President	Retain until exoneration	Destroy
Complaints and Grievances – Upheld	Records relating to complaints and grievances filed in cases of affirmative action, discrimination, equal opportunity employment, harassment issues, and academic issues in which the complaint/grievance was upheld. May be filed by students, job applicants, the public, and represented and non-represented state employees. May include: filed complaints and grievances; supporting documentation; unit or university responses and decisions; legal actions,	President	6 years after final determination of case	Destroy

	arbitration or mediation efforts; determinations and appeals. Excludes records covered by Complaints and Grievances –Exonerated			
Executive Administration and Communication Records	Records documenting official activities and communications relevant to the office's executive function. May include: administrative correspondence, directives, and subject files. Does not include records dealing with personnel management or budget planning.	President	2 years after fiscal year	Transfer to Archives
Meeting Records - Check-in/Stand-up Meetings	Records of check-in or "stand-up" meetings focused on information sharing, brainstorming, and planning, where no formal decisions are made. (Generally, these types of meeting do not generate records. This records series does not require records to be created.)	N/A	Until administrative need is met	Destroy
Meeting Records - Governing or Policy-Setting Committees, Councils, Task Forces, and Other Bodies	Records of policy-setting committees, councils, task forces, and other deliberative or governance bodies (other than the Board of Trustees, Faculty Senate, and Associated Students Board of Directors). May apply to bodies at the university, division, college, or departmental level. Typical records include charge/statement of authority, meeting agendas and minutes, and reports or other mandated output.	President	6 years after calendar year	Transfer to Archives

	Does not include records of adjudicative bodies, curriculum committees, or records of search committees, for which separate schedules apply, and does not apply to informal, non-reporting groups.			
Meeting Records - Staff Meetings and Internal Working Groups	<p>Records of staff meetings and other internal working groups that do not require reporting out to other bodies (and when not otherwise identified on a retention schedule). May include agendas, meeting minutes, and meeting handouts.</p> <p>Does not include records of adjudicative bodies, curriculum committees, or records of search committees, for which separate schedules apply, and does not apply to formal, policy-setting bodies.</p>	President	2 years after calendar year and administrative need is met	Destroy
Office/Program History Files	Records documenting the planning, establishment, and significant changes/developments of a unit. May include: summaries or histories of the office; scrapbooks, news clippings, photographs, etc., documenting the history of the office; organizational charts and other planning records documenting significant changes and restructures (such as office mergers/splits, creation/combinations of divisions, major changes of office functions and roles,	Education Director	6 years after calendar year	Transfer to Archives

	etc.); or transitional documentation prepared for incoming unit heads.			
Policies and Procedures - Administrative Functions	Records relating to the development, implementation, and interpretation of the policies and procedures developed by sub-units of the university to support their internal administrative functions. May include: each adopted/approved version of policies and procedures and records documenting the development of policies and procedures. Does not include records of university-wide policies.	President	6 years after superseded	
Strategic Plans and Annual Reports	Reports and plans, such as strategic plans or annual reports, detailing the unit's goals, priorities, and achievements. May apply to plans/reports produced at any level, from a program unit to larger administrative division.	President	Retain until end of fiscal year	Transfer to Archives
Studies and Final Reports	Studies and reports with department-, division-, or university-wide relevance, typically prepared in response to a specific charge or directive. May be the work of a group or individual. The extent of supporting documentation, (e.g., survey data or other cited materials) included with the final report may vary according to need.	President	6 years after conclusion of study or report	Transfer to Archives
Studies and Reports, Working Papers/Development	Records relating to the development of reports and studies and to the conducting of studies with	President	6 years after conclusion of study or report	Destroy

	department-, division-, or university- wide relevance, typically prepared in response to a specific charge or directive. May be the work of a group or individual. May include survey data or other materials gathered and used in the studies.			
Work Instructions and Desk Manuals	Routine day-to-day task/work instructions, desk manuals, etc. These are desk level interpretations of a policy or procedure.	President	Retain until superseded	Destroy

2. Human Resources Management

Title	Description	Custodian of Record	Primary Retention	Disposition
Course Evaluations	Course evaluations for classes that are forwarded to department chairs or deans by faculty members for use in formal performance evaluation processes.	Education Director	Retain until completion of performance evaluation and resolution of any ongoing performance issues	Destroy
Personnel Files	Office-level personnel files for faculty and staff (both permanent and temporary), as well as volunteers. May include copies of personnel action forms, employee information forms, or payroll forms that are held by Human Resources. May also include items such as letters of recommendation, awards, or correspondence that are not held by HR.	President	6 years after separation from unit	Destroy
Search and Recruitment Records	Records relating to the process of recruitment and selection of employees. May include: job	HR	3 years after completion of	Destroy

	announcements and postings; job description and qualifications; eligibility lists for specific positions; applications, resumes and test results; applicant profile data; scoring, ranking and selection criteria; interview questions and evaluations; background and criminal history checks; reference check questions and answers.		recruitment/hiring process	
Tenure and Promotion Files	Includes faculty evaluations of individual applicants for promotion, reports, merit increases, professional leaves, teaching awards and other faculty awards and honors, correspondence and other materials from college departments and committees that provide support documentation for recommendations made by the Education Director.	Education Director	7 years after fiscal year	Destroy
Training Files – Individual Employee Files	Records documenting the training history of individual employees participating in training, orientations, and staff development programs (if not included in their personnel files).	HR	6 years after separation from agency	Destroy

3. Academic

Title	Description	Custodian of Record	Primary Retention	Disposition
Grades	Final grade submissions in electronic format	Registrar	Permanent	
Catalogs	Course catalogs	Registrar	Permanent	

Student Progress Monitoring Files	Files tracking students' progress through program. May include plans of study, copies of student applications to major/program, and records of student internships	Registrar	6 years after student is no longer in program	Destroy
Course Registration	Registration in courses including Adds, Drops and Withdrawals	Registrar	Permanent	
Academic Transcript	Washington Technology University academic transcripts	Registrar	Permanent	
Incomplete Grade Contract Records	Contracts between instructor and student setting terms for course completion and assignment of incomplete grade. May include related correspondence	Registrar	6 years after course completed or grade lapses to a "Z" (failure due to discontinued attendance)	Destroy
Independent Study/Directed Study Contracts	Contracts between instructor and student setting terms for course completion	Registrar	6 years after course completed or grade lapses to a "Z" (failure due to discontinued attendance)	Destroy
Academic Integrity Violations	Academic integrity violations upheld	Education Director	Permanent	

4. Admissions

Title	Description	Custodian of Record	Primary Retention	Disposition
Applications for Admission to University or Program	Student applications for admission to the university or to a program or major. May include test scores, essays, application forms, or portfolios	Director of Admissions	6 years after term applied for	Destroy

Admission Application Documents of Enrolled Students	Includes: High School Transcript or Proof of Equivalent; College Transcripts; Credit by Exams; Entrance Examination Reports/Test Scores; Military Documents; TOEFL Scores; IB Score Sheet; Veteran Information; Credential Evaluation; International Credit Evaluation	Registrar	5 years after degree posting date or last date of attendance	Destroy
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5. Marketing

Title	Description	Custodian of Record	Primary Retention	Disposition
Communications and Media Coverage Files	Records documenting the creation and distribution of communications and publicity materials through various media. Includes articles, news clippings, news/press releases, audiovisual materials, photographs, and related publicity materials referencing the college, department, or program.	Marketing Manager	2 years after end of calendar year	Transfer to Archives
Marketing and Promotional Records	Records relating to the planning and/or execution of advertising and promotional activities. May include: marketing plans/strategies; records relating to the development of advertising campaigns and materials (such as original artwork, designs, storyboards, etc.); samples of advertising materials (regardless of format); records relating to the evaluation of campaigns and strategies; records relating to the design and selection of unit branding (such as logos, mottos, slogans, etc.); related correspondence and communications.	Marketing Manager	Retain until administrative purpose served	Transfer to Archives

6. Curriculum

Title	Description	Custodian of Record	Primary Retention	Disposition
Course Content Records	Records documenting the content of courses (both academic and non-academic) offered by the university.	Education Director	2 years after quarter in which course takes place	Transfer to Archives
Course Offering and Schedule Preparation Files	Material used by departments in preparation of catalog copy and class schedules. Retention for these records is minimal, as the final product is the official course schedule, the official catalog entry, or the approved budget allocation.	Registrar	Until administrative need is met	Destroy
Course Recordings	Recordings of courses made to facilitate teaching and learning remotely.	Education Director	2 years after quarter in which course takes place	Destroy
Course Syllabi	Syllabus for each departmental course offered per quarter as collected by the respective department or academic administrative unit.	Education Director	2 years after quarter in which course takes place	Transfer to Archives
Curriculum Committee Records	Provides a record of the process of curriculum development and/or revision. Includes records specifically relevant to curriculum proposals or revisions, and records documenting the process of review through department- and college-level committees, including approval or rejection. The official record of curriculum changes is what is implemented in the catalog. The records of curriculum committees have shorter retention requirements.	Education Director	3 years after fiscal year	Destroy

7. Information Systems

Title	Description	Custodian of Record	Primary Retention	Disposition
Systems Access Authorization	Records documenting the authorization of employees (including contractors and volunteers) to use unit systems/applications and telecommunication services. May include user account creation/change requests or network access authorization requests.	Director of Information Technology	6 years after fiscal year in which user account/access was terminated	Destroy
Website Traffic Data	Statistics and data collected regarding traffic on the university's websites.	Director of Information Technology	Until administrative need is met	Destroy

8. Finance

Title	Description	Custodian of Record	Primary Retention	Disposition
Transactions	Accounting transactions	CFO/Chief Accountant	Permanent	CFO/Chief Accountant
Journal	Original journal or budget Entries	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Transaction Support	Supporting documentation for transactions	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Travel Expenses	Travel expense reports and supporting documentation	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Audited Statements	Audited university financial statements	CFO/Chief Accountant	Permanent	CFO/Chief Accountant
Financial Statements	Internal annual university financial statements	CFO/Chief Accountant	Permanent	CFO/Chief Accountant

Budgets	Annual approved university budgets	CFO/Chief Accountant	7 years	CFO/Chief Accountant
Invoices	Accounts receivable invoices, trial balances and ledgers	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Purchase Orders	Purchase orders & supporting information (specifications, bids, quotes, contracts, etc.)	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Accounts Payable	Accounts payable invoices, credit card Statements, vouchers & supporting information (packing slips, freight records, bills of lading, etc.)	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Check Registers	Check registers (Accounts Payable, Payroll, other)	CFO/Chief Accountant	Permanent	CFO/Chief Accountant
Capital Assets	Capital asset records (including Depreciation)	CFO/Chief Accountant	Life of the asset plus one fiscal year	CFO/Chief Accountant
Donations	Pledges, gifts, planned giving and other donor-related documentation	CFO/Chief Accountant	Permanent	CFO/Chief Accountant
Timecards	Time and attendance records (timecards, rosters, attendance cards, efforts)	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Payroll	Payroll distribution reports and supporting information (including reallocation forms)	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
Employee Deductions	Records of employee deductions, contributions, and related information	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant

Employee/ Contractor Tax Reporting	Annual W-2, 1099, 1042-S and other individual tax reporting	CFO/Chief Accountant	7 years or until audit is complete, whichever is greater	CFO/Chief Accountant
BoT Minutes	Meeting minutes of the Board of Trustees. Includes budget approvals.	President's Office/ General Counsel	Permanent	President's Office/Gen eral Counsel