

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Title: Record Retention and Destruction Policy

Applicability: College-wide: Faculty, Staff, and Administrators

Oversight: General Counsel

Purpose: To provide for the systematic management of College records

Effective Date: April 1, 2021

*Adopted by the President's Cabinet on February 23, 2021*

*Approved by the Audit Committee of the Board of Trustees on March 26, 2021*

*Minor amendments made to Appendix [Admission/Enrollment] on November 13, 2023*

### **Rationale for the Policy**

Providence College is committed to managing its records effectively in order to preserve its history, satisfy applicable legal requirements, maximize limited space and ensure that outdated and needless records are destroyed. This commitment requires that all College records, regardless of format, be retained or disposed of within specified periods of time. The Record Retention and Destruction Policy provides instruction concerning the ongoing execution of this commitment.

### **What are College Records?**

A “record” is anything created in connection with College operations that contains information in any medium (paper, electronic, video, etc.) or in any form (handwritten, typed, etc.), wherever made or maintained. The category of materials that are records includes, but is not limited to, electronically stored information such as emails, word processing documents, calendars, voice messages, instant messages, spreadsheets, videos, photographs and all other data in any location where such information may be stored, such as a PC, laptop, PDA, flash drive, diskette, zip disk, compact disc, DVD, portable hard drive, smartphone, etc. Some records are confidential records and these should be treated with particular sensitivity.

The following categories of materials are not records and should be disposed of after they have served their operational purpose: (i) preliminary drafts of letters, memoranda, reports, worksheets and informal notes which do not represent significant basic steps in the preparation of a College record and (ii) convenience copies of reports, memoranda, etc. Drafts and copies should be destroyed after they have served their operational purpose.

### **Who has Responsibility for the Management of this Record Retention and Destruction Policy?**

Individual departments are responsible for the implementation and application of this Policy. The divisional vice-presidents of the College in particular are entrusted with

ensuring adherence to the policy within their respective spheres of responsibility.

All administrators, faculty and staff should recognize that the integrity of the College's record management practices requires that all College records clearly indicate the date of their creation or update. Accordingly, all College records should bear a relevant date.

### **How are Records Categorized and Maintained?**

The answer depends on the type of information contained in a given record. College data and other material is either "confidential," "operational use," or "unclassified." Records that are "confidential" are those that contain

- personally identifiable information concerning any individual (including name, social security number, date of birth, driver's license number, alien registration number, passport number, employer identification number, student identification number or computer Internet Protocol address);
- individual student educational records;
- medical or psychological treatment records or other health information of an individual
- personal financial information (such as Forms W-2, credit card numbers, bank account numbers, or other similar financial transaction information);
- individual employment records of current or former faculty members, administrators, other staff members or student employees, including records that concern hiring, appointment, promotion, salary, performance, termination or other circumstances of employment.

Confidential records may also include information concerning College fundraising (i.e., anonymous grants) or other data the use or confidentiality of which has been restricted by agreement.

Maintenance of confidential records are generally regulated by local, state, or federal privacy regulations, voluntary industry standards, or best practices that the College has adopted concerning protection of personally identifiable information. Confidential records must be kept strictly confidential and shared among appropriate College officials only where necessary to perform the legitimate functions of their positions and where disclosure is not otherwise prohibited by law, regulation or standards or practices adopted by the College. Confidential records must always be protected against misuse, misplacement, damage, destruction, theft, or inadvertent disclosure.

In addition, confidential records must not be stored in an electronic form in any location except on a College secure server or approved asset/resource. Records in physical media must be secured so that only authorized individuals can access the information.

Records that contain information of "operational use" include proprietary data whose loss, corruption, or unauthorized disclosure would not necessarily result in any violation of applicable legal requirements, or any significant business, financial, or legal loss, but which the College has

determined is nonetheless sensitive and critical to its operations. Examples of operational use data include, but are not limited to, budgets, general salary information, and purchasing data. Operational use records should be handled with the same sensitivity as records that are confidential.

All other records are “unclassified.” Unclassified records do not contain sensitive data and are generally intended for a broad audience. Examples include, but are not limited to, department faculty lists, press releases, public web site content, and general or informational emails.

Department heads, in consultation with the Information Technology Department, are responsible for ensuring that electronic records are not rendered unusable on account of deterioration or changes in technology.

### **For How Long Must a Record be Preserved?**

The Record Retention and Destruction Schedule found in Appendix A, as updated from time to time, provides direction for the preservation and/or final disposal of records.

Inactive records (those that have not been needed for more than a year but that may not be disposed of under the Record Retention and Destruction Schedule) should be labeled and stored for the balance of the retention period set forth in the Record Retention and Destruction Schedule. Each department may decide where to store such records (either within the department in designated on-site department storage or with an authorized off-site archival service). Regardless of where inactive records are stored, the department of origin is responsible for maintaining files or logs describing the contents of stored records and for retrieving records upon official request.

The Record Retention and Destruction Schedule lists the most common records of the College. Nonetheless, many departments and offices will create or maintain records requiring retention that are not specifically listed on the schedule. Please contact the Office of General Counsel with questions concerning the final disposition of a record that is not identified on Appendix A.

### **What Procedures Apply to the Disposal of College Records?**

At the end of the relevant retention period, records not identified for permanent retention should be destroyed. Departments may dispose of records contained in physical media by recycling the content upon retention expiration. Confidential and operational use records must always be shredded in a secure manner that prevents inadvertent disclosure. Unclassified records may be disposed of utilizing general recycling practices.

Confidential records in electronic or machine-readable formats must be either physically destroyed or erased beyond recovery before being discarded or re-used. Destruction of confidential records in electronic or machine-readable formats should be accomplished in

cooperation with the Information Technology Department, and may be done with the assistance of an authorized third-party vendor that will provide detailed records of the media presented for destruction with date/time stamps as well as the method of destruction utilized to render the records unreadable and non-restorable. Film, audio and videotapes containing confidential records must be physically destroyed, unless it is possible to overwrite confidential material with non-confidential content. Any overwriting should be done with the guidance of the Informational Technology Department.

Department heads must assure that the method of destruction does not permit recovery, reconstruction, and future use of confidential information. Department heads must also maintain an inventory describing and documenting destroyed records by general category, as well as the date and method of destruction. The inventory of destroyed records itself must not contain any confidential information. This inventory may be retained in paper or electronic format.

The College's email and instant messenger (IM) systems exist to facilitate electronic communication. Neither are intended for storage and archival purposes. Originators and recipients of emails or messages sent over IM are responsible for identifying and saving outside of the electronic system those records that must be retained in order to comply with federal, state and local laws, as well as the requirements of this policy. These records may be saved by storing printed copies in appropriate files, or by saving messages in a stable retrievable electronic format on long-term medium or a managed file server with the original messages subsequently deleted, in compliance with departmental guidelines and consistent with this Record Retention and Destruction Policy. Any backups performed by the Information Technology Department are not intended for restoration of individual mailboxes and will not be used as a convenience to retrieve deleted messages.

### **What If I Receive a Subpoena or Other Court Order?**

Certain College records may become relevant to lawsuits, claims or administrative charges. Subpoenas and similar orders, such as document requests, are legal documents issued by a governmental body requiring the College to provide access to certain records, including email and electronic files, in accord with the terms of the subpoena or other order. The College is obligated to comply with any valid subpoena or order of a government body.

Notify the Office of General Counsel immediately upon receipt of a subpoena, court order or other document issued by a court or governmental body. Upon service of a subpoena, summons, or similar court order or notice, or upon learning of an internal or governmental investigation or audit, or if a claim is made involving the College, whether formal or informal, or if a dispute involving the College arises, the Records Retention Schedule shall be suspended for those departments or persons affected.

### **What Happens When a Litigation Hold is Issued?**

When a legal process, claim, dispute investigation or audit is pending or threatened against the

College or its employees, a litigation hold directive is issued by the Office of the General Counsel. A litigation hold directive overrides the record retention period until the hold has been cleared, i.e., until the litigation or proceeding has terminated and the time for all appeals has expired.

During the period in which a litigation hold directive is in effect, in no case may any record that is arguably relevant to the legal process, claim, dispute investigation or audit be altered or destroyed, regardless of the format in which the record exists, except by permission of the Office of General Counsel. Data, email and accounts of employees subject to the litigation hold directive must be maintained by the Information Technology Department until the hold is released. Employees must take all reasonable steps to preserve records covered by the litigation hold directive and cooperate with the Information Technology Department where necessary to preserve records contained in an electronic format in their original electronic form. Violation of the hold may result in disciplinary action, including dismissal, as well as personal liability for civil and criminal sanctions imposed by a court or law enforcement agency.

### **What Special Provision Must Be Made for Credit Card Data?**

Various business processes at the College involve the acceptance of credit and debit cards. The data contained on a credit or debit card is referred to as cardholder data (CHD) and is regulated by the Payment Card Industry Data Security Standard (PCI DSS). The scope of CHD includes, but is not limited to, the following:

- 16-digit Primary Account Numbers (PANs);
- Cardholder names;
- Card expiration dates;
- Personal Identification Numbers (PINs);
- Magnetic track information; and
- Verification codes typically printed on the back of a credit or debit card (for example, CVV2, CAV2, CVC2, CVV2, or CID codes).

College policy requires that CHD must never be written or stored in any electronic or physical record under any circumstance. Adhering to this policy greatly reduces the likelihood of unauthorized disclosure.

# APPENDIX A

*Updated April 1, 2021*

## Records Retention & Destruction Schedule

### College-Wide Records (relevant to each department as applicable)

#### Institutional Records

Record Type	Office Retention Period	Final Disposition
Corporate Charter	Permanent	President's Office - Copy to Archives
Bylaws and Bylaw Amendments	Permanent	President's Office - Copy to Archives
Federal Department of Education Institutional Approval Notice	Permanent	Provost's Office
Eligibility and Certification Approval Report (ECAR)	Permanent	Provost's Office
Program Participation Agreements (PPA)	Permanent	Provost's Office
PPA Transmittal Letter	Permanent	Provost's Office
Applicable State Licensure	Permanent	Provost's Office
Minutes of Faculty Senate	Permanent	President's Office - Copy to Archives
Organizational Charts	Permanent	Archives (when no longer in active use)
Policy Statements	Active + 10 years	Destroy
Contracts (other than individual contracts of employment – see Human Resources)	10 years after contract termination, or 10 years after demolishing or sale of building in case of construction contracts and agreements (i.e., agreements with architects, consultants, general contractor and any subcontractors)	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

All Accreditation and Licensing Records	Permanent	President's Office - Copy to Archives
General Consultant Reports	7 years after completion	Archives
Internal Departmental Reports	3 years after completion	Archives
Handbooks	10 years	Archives
Self-Studies	3 years	Archives
Program Reviews	5 years	Archives
Task Force Reports	3 Years	Archives

### Real Property Records

Record Type	Office Retention Period	Final Disposition
Property Deeds & Titles, Easements, Licenses, Rights of Way, Rights of First Refusal, Remainder Interests, Mortgages	Permanent	General Counsel
Title Insurance Policies	10 years after disposal of property	Destroy
Attorney Opinion Letters (property)	10 years after disposal of property	Destroy
Leases	Active + 6 years	Destroy
Property Surveys, Maps and Blueprints	Permanent	Finance & Business

### Insurance and Risk Management

Record Type	Office Retention Period	Final Disposition
Insurance Policies	Permanent	General Counsel
Certificates of Insurance	Active + 5 years following expiration	Destroy
Fire Inspection Reports	6 years	Destroy
Insurance Claim Working Papers	Active + 10 years following resolution	Destroy
Worker's Comp-Related Incident/Accident reports	6 years after report date	Destroy
Workers' Comp Claims Files	Active + 7 years following claim closure	Destroy
Accident/Incident Report Involving Minor Sex Abuse	Until child reaches age of majority + 7 years	Destroy
Accident/Incident Report Involving Employee Exposure to Toxic or Harmful Substances	30 years after report date	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Accident/Incident Report Involving College-owned, rented or leased vehicles	The later of 5 years after report date or until vehicle is disposed of	Destroy
General Accident/Incident Report (non-employee)	3 years following report date	Destroy
Motor Vehicle Record Review Consent Forms and Results	3 years after end of employment or student's graduation	Destroy
Volunteer Registration Forms, Participant Waivers & Agreements ( <u>not</u> pertaining to minors under 18 years of age)	3 years after event date	Destroy
Volunteer Registration Forms, Participant Waivers & Agreements (pertaining to minors under 18 years of age)	Permanent	Maintain in department that generated waiver
All Camp Participant, Employee, Volunteer & Other Waivers & Agreements (not pertaining to minors under 18 years of age)	3 years after conclusion of event	Destroy
All Camp Participant, Employee, Volunteer & Other Waivers & Agreements (pertaining to minors under 18 years of age)	Permanent	Maintain in department that generated documentation
All Camp BCI/Background Investigation Reports	3 years after conclusion of event	Destroy

### Academic Affairs

#### Admission – Applicants Who Do Not Enroll

Record Type	Office Retention Period	Final Disposition
Application for Admission or Readmission	September 1 of the year following conclusion of the application term	Destroy
Decision Letters	September 1 of the year following conclusion of the application term	Destroy
Transcripts and Supporting Academic Materials	September 1 of the year following conclusion of the application term	Destroy
Standardized Test Results and Academic Performance Information (GPA, Curriculum, etc.)	Permanent	Admission
Correspondence	September 1 of the year following conclusion of the application term	Destroy



## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

### Admission – Applicants Who Do Enroll

Record Type	Office Retention Period	Final Disposition
Application Materials - Student-Submitted Items (application, transcripts, etc.)	10 years after date of last attendance	Destroy
Application Materials – Correspondence and Decision Letters	10 years after date of last attendance	Destroy
Admission Review Process Documents (reader review forms)	September 1 of the year following conclusion of the application term	Destroy
Acceptance Letters	10 years after date of last attendance	Destroy
Transcripts (Domestic)	1 year after date of last attendance	Destroy
Transcripts (International)	Permanent	Registrar
Standardized Test Results and Academic Performance Information (GPA, Curriculum, etc.)	Permanent	Registrar
Entrance Exams and Placement Scores	10 years after date of last attendance	Destroy
Letters of Recommendation	September 1 of the year following conclusion of the application term	Destroy

### Registrar (and School of Continuing Education)

Record Type	Office Retention Period	Final Disposition
Individual Student Academic Records	Permanent	Registrar
Advance Placement Credit Records	Permanent	Registrar
Name Change, Change to SSN or Student ID Number	Permanent	Registrar
Student Registration Forms	5 years from registration	Destroy
FERPA Consents and Disclosures	Life of underlying record	Destroy
FERPA Requests to Review	Life of underlying record	Destroy
Graduation Lists	Permanent	Registrar - Copy to Archives
Original Course Grade Records	Permanent	Registrar
Schedule of Courses	Permanent	Office Retention – Copy to Archives
College Transcripts	Permanent	Registrar
Transcript Requests	1 year	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Withdrawal Authorizations/Leaves of Absence	7 years from effective date	Destroy
Course Catalogs	Permanent (1 copy)	Registrar – Copy to Archives
Course Add/Drop slips	1 year after graduation (or 5 years after last attendance for non-graduates)	Destroy
Independent Study Forms	1 year after graduation (or 5 years after last attendance for non-graduates)	Destroy
Pass/Fail Requests	1 year after graduation (or 5 years after last attendance for non-graduates)	Destroy
Class Rosters	Permanent	Registrar
Diplomas Not Retrieved by Student	Permanent	Registrar
Enrollment Verifications	1 year after graduation (or 5 years after last attendance for non-graduates)	Destroy
Teacher Certifications	Permanent	Registrar
Veteran Benefit Certifications	7 years from date of certification	Destroy

### Admission Marketing & Institutional Research

Record Type	Office Retention Period	Final Disposition
Application Statistics	Permanent	Admissions
Degree Statistics	Permanent	Admissions
Enrollment Statistics	Permanent	Admissions
Grade Statistics	Permanent	Admissions
Racial/Ethnic and Gender Statistics	Permanent	Admissions
Admission Event Registration	1 year from the date of the event	Destroy
General Marketing Materials, Research & Plans	5 years	Destroy
Institutional Research Annual Reports	Permanent	Archives

### Financial Aid

Record Type	Office Retention Period	Final Disposition
Applications	6 years from graduation or date of last attendance	Destroy
Financial Aid Awards	6 years from graduation or date of last attendance	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

FISAP	3 years from the end of award year in which the report was submitted	Destroy
Financial Aid Transcripts	6 years from graduation or date of last attendance	Destroy
I-9 Forms (for students)	The later of 3 years or 1 year after separation	Destroy
Job Placement	6 years from graduation or date of last attendance	Destroy
Lender's Name and Address	6 years from graduation or date of last attendance	Destroy
Other Documents in Financial Aid Files	6 years from graduation or date of last attendance	Destroy
Original Promissory Notes	Permanent	Financial Aid
Repayment History	6 years from graduation or date of last attendance	Destroy
Truth in Lending Disclosures for Private Loans (template plus proof of delivery)	Life of the loan + 4 years	Destroy
Summary Statistical Reports	Permanent	Financial Aid

### Office of Academic Affairs

Record Type	Office Retention Period	Final Disposition
School/Department Accreditation Documents and Reports	Permanent	Provost's Office
Accreditation Supporting Documents	10 years	Destroy
Guidelines for Tenure & Promotion	Permanent	Provost's Office
Handbooks	Permanent	Provost's Office
Faculty Committee	3 years	Destroy
Response to Mission Statement	Active + 3 from separation	Destroy
Grievances	Active + 3 from separation	Destroy

### School & Academic Departments

Record Type	Office Retention Period	Final Disposition
Department Annual Reports	6 years	Archives
Course Syllabi	6 years	Destroy
Curriculum Development Documentation	6 years	Archives
Faculty Evaluations	6 years after separation	Destroy
Peer Review Documents	6 years after separation	Destroy
Grievances	10 years after resolution	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Department Faculty Meeting Minutes	10 years	Archives
Grant Files	Active + 6 years	Destroy
Personnel Files, Appointment Letters & Forms	10 years after separation (6 for adjuncts, lecturer, special lecturer)	Destroy
Tenure or Promotion Files	10 years after separation	Destroy
Travel Vouches, Trip Logs	3 years	Destroy
Search Committee Documents	1 year after completion of search	Destroy

### Individual Faculty Files

Record Type	Office Retention Period	Final Disposition
Academic Advising Records	10 years from later of graduation or last day of attendance	Destroy
Faculty Committee Evaluation Reports	Permanent	Relevant Department
CART Records	Permanent (maintain in relevant department while active + 3 years)	Archives

### Testing & Experimentation

Record Type	Office Retention Period	Final Disposition
Documentation re Institutional Review Board for Human Subjects	3 years	Destroy
Documentation re Institutional Review Board for Animal Subjects	3 years	Destroy
Institutional Research	5 years	Archives

### Library

Record Type	Office Retention Period	Final Disposition
Records of Fines & Fees	7 years	Destroy

### International Studies & Students

Record Type	Office Retention Period	Final Disposition
I-20 Forms	Active + 5 years	Destroy
J-Visa Documents	Active + 5 years	Destroy
SEVIS Records	Active + 5 years	Destroy
Other International Student Files (including F-1 visas)	Active + 5 years	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Study Abroad Applications, Records, Correspondence	5 years	Destroy
Study Abroad Program Contracts	End of participation + 11 years	Destroy
Participant Waivers and Consents	See Insurance and Risk Management (above)	

### Athletics

Record Type	Office Retention Period	Final Disposition
Medical Insurance Records	While student active + 7 years	Destroy
NCAA Compliance Documentation	7 years	Destroy
NCAA Inquiries & Infraction Case Files	7 years or length of sanctions	Destroy
Gender Equity Plan (EADA Report)	Permanent	Athletics
Drug Testing Consent Forms	While student is active + 7 years	Destroy
Title IX Compliance & Other Government Reports	Permanent	Athletics
Recruiting Information and Records for Student-Athletes	6 years after graduation or date of last attendance	Destroy
Student-Athlete Records	6 years after graduation or date of last attendance	Destroy
Agent Registration Documents	2 years after removal from registration list	Destroy
Athletic program and media guides	Permanent	Archives
Facility Rental Agreements, Concession/Lease Agreements & Other Contracts	10 years after contract termination	Destroy
Athletic Contests Scores and Stats	Permanent	Archives
Ticket Records	Permanent	Athletics
Athletic Summer Camps: Waivers & Parental Consent Forms	See Insurance and Risk Management	Athletics
Athletic Summer Camps: BCI/Background Reports	See Insurance and Risk Management	Athletics



## External Affairs, Marketing, Board Relations and College Events

Record Type	Office Retention Period	Final Disposition
Minutes of Corporation Board	Permanent	President's Office - Copy to Archives
Minutes of Board of Trustees and Board Committees	Permanent	President's Office - Copy to Archives
Commencement Programs	Permanent	College Events – Copy to Archives
Event Registration and Attendee Reports	Permanent	College Events
Event Licenses and Permits	Active + 6 years	Destroy
Golf Cart Certification Forms	Active + 3 years from separation	Destroy
Speaker, Performer, Venue and Vendor Contracts	Active + 10 years following termination	Destroy
Commercial Videos	Permanent	Archives
Consent for Photos and Videotapes	So long as photo/video footage in use + 11 years after destroying image or footage	Destroy

## Finance and Business

### Payroll Records

Record Type	Office Retention Period	Final Disposition
Employer Copy of IRS Form W-2	6 years	Destroy
Imputed Income Records (auto usage, etc.)	8 years	Destroy
Information Returns Filed with Federal & State Authorities	6 years	Destroy
Payroll Deduction Authorization Forms (IRS Form W-4)	5 years after employment ends	Destroy
Payroll Deduction Records	5 years after employment ends	Destroy
IRS Form 941	8 years	Destroy
Garnishment Orders	While Active	Destroy
Cost of Living Tables	1 year	Destroy
Salary or Current Rate of Pay	5 years after employment ends	Destroy
Payroll Vouchers	5 years	Destroy
Timesheets, timecards, etc.	5 years	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Time Cards, student work-study	5 years after date student loans are paid	Destroy
Telephone Bills	1 month post-verification	Destroy

### Bursar

Record Type	Office Retention Period	Final Disposition
Collection Paid in Full Records	7 years from satisfaction	Destroy
Collection Write-off Records	Permanent	Bursar
IRS Forms 8300	7 years	Destroy
IRS Forms 1098T & 1098E	7 years	Destroy
Perkins Loan Paid in Full Records	7 years	Destroy
Private Scholarship Information	7 years	Destroy
Refund Information	7 years	Destroy
Student Loan Records	5 years after the loan is repaid in full	Destroy
3 <sup>rd</sup> Party Credit Information	7 years	Destroy
Tuition and Fee Charge Records	6 years	Destroy

### Accounts Payable

Record Type	Office Retention Period	Final Disposition
Forms W-9	Permanent	Finance & Business
Accounts Payable Ledgers	5 years	Destroy
Expense Reports	5 years	Destroy
Invoices & Other Requests for Payment	5 years	Destroy
Payment/Disbursement Records	5 years	Destroy
IRS 1099 Misc. Payee List & Electronic Filing Data	3 years	Destroy

### Procurement

Record Type	Office Retention Period	Final Disposition
Purchase Requisitions	1 year from the end of the fiscal year generated	Destroy
Bid Responses	5 years	Destroy
Purchase Orders	5 years	Destroy



## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

### Financial Records

Record Type	Office Retention Period	Final Disposition
Annual Budget Detailed Work Papers	Life of budget + 3 years	Destroy
Annual Audited Financial Statements	Permanent	Finance & Business
Audit Work Papers	3 years	Destroy
Banking Records (statements & Reconciliations, voided and cancelled checks, deposit records)	6 years	Destroy
Budget Adjustment Forms	6 years	Destroy
Budget Summaries	Permanent	Finance & Business
General Ledger Journal Entry Forms & Back-up Documentation	6 years	Destroy
Trial Balances	6 years	Destroy
Monthly Financial Reports	3 years from the end of the fiscal year generated	Destroy
Capital Budget Reports	6 years	Destroy
Capital Equipment Records	Life of the asset OR if purchased with federal funds, 3 years after final disposition	Destroy
Depreciation Records	Life of asset + 7 years	Destroy
Expenditures of tax-exempt bond proceeds	Life of Bond	Destroy
Bank Statements & Cancelled Check Copies	6 years	Destroy
Check/Direct Deposit Registers	1 year	Destroy
Deactivated Account Documents	6 years	Destroy
Grant-related financial records	Active + 6 years	Destroy
Endowment Reports	Permanent	Finance & Business
Unclaimed Property Reports	10 years	Destroy
Bond Closing Documents (information statement, trust indenture, loan agreement, bond counsel opinion)	6 years after complete retirement of bond and any bonds that refund the original issuance (including series of refunding)	Destroy
Records of Bond Proceed Expenditures (trustee statements, requisitions, vendor invoices, etc.)	6 years after complete retirement of bond and any bonds that refund the original issuance (including series of refunding)	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Investment of Bond Proceeds (income earned, purchase and sale of securities, yield calculations, guaranteed investment contracts, rebate calculations, rebate payments, Forms 8038-T, etc.)	6 years after complete retirement of bond and any bonds that refund the original issuance (including series of refunding)	Destroy
Private Business Use Monitoring Records for Bond Proceeds (copies of management contracts, research agreements, etc.)	6 years after complete retirement of bond and any bonds that refund the original issuance (including series of refunding)	Destroy
Other Records Particular to Tax-Exempt Bond Issue	6 years after complete retirement of bond and any bonds that refund the original issuance (including series of refunding)	Destroy

### Tax

Record Type	Office Retention Period	Final Disposition
Assets: Acquisition/Disposition Depreciation Schedules	Life of Asset + 7 years	Destroy
Escheat Filing	Current + 7 years	Destroy
Excise Tax Returns	Current + 7 years	Destroy
Income Tax Returns	Current + 7 years	Destroy
Information Returns (not listed elsewhere; i.e., Forms 990, 1099, 8282, 90.22, 1042, etc.)	Current + 7 years	Destroy
Sales Tax Returns	Current + 7 years	Destroy
Other Tax Returns	Current + 7 years	Destroy

### Physical Plant Records

Record Type	Office Retention Period	Final Disposition
Engineering Studies and Reports	Permanent	Physical Plant/Capital Projects & Facilities Planning - copy to Archives
Construction Plans and Specifications	Permanent	Physical Plant/Capital Projects & Facilities Planning - copy to Archives
Surety Bonds	Until end of the covered period	Destroy
Equipment Inventory	Active + 6 years	Destroy
Property Improvement Records	Active + 6 years	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Licenses and Permits – Real Property	Active + 6 years	Destroy
Zoning Permits	Active + 3 years	Destroy
Maintenance & Repair Records (including motor vehicle records)	Life of the Equipment + except for records for	Destroy
Fire Protection System Records	5 years	Destroy
Fire Department Inspections	3 years	Destroy
Fire Drill Records	3 years	Destroy
Fire Extinguisher Records	3 years	Destroy
Certificate of Occupancy	Life of building	Destroy
Elevator Certification	5 years after expiration of certificate	Destroy
Building Electronic Access Logs (including fitness center, residences, academic and administration buildings)	7 years	Destroy

### Environmental Health & Safety

Record Type	Office Retention Period	Final Disposition
Laboratory Fume Hood Testing Records	5 years	Destroy
Radiation Dose Reports	Permanent	Environmental Health & Safety
Radiation Safety Training Records	3 years	Destroy
Radioactive Materials License & Safety Committee Records	Permanent	Environmental Health & Safety
Radioactive Material Receiving Inventory Records	3 years	Destroy
Testing Results (air quality, mold, lead, etc.)	10 years	Destroy
Lab Training Records	3 years	Destroy
Hazardous Waste Manifests	3 years	Destroy
Air or Waste Water Emission Records and Reports	6 years	Destroy
OSHA Reports (300/301 logs)	6 years	Destroy
OSHA Reportable Incident Files	5 years	Destroy
Asbestos Records	30 years	Destroy
Work Order Documentation	3 years	Destroy
Medical Clearances	Active + 30 years from date of separation	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

### Information Technology

Record Type	Office Retention Period	Final Disposition
-------------	-------------------------	-------------------

File Servers	30 days from daily backup; 4 weeks of weekly backup	Destroy
Banner Databases	14 days from daily backup	Destroy
Current Employee/Student Email – All Emails	7 years	Destroy
Former Employee – All Emails	6 months after separation	Destroy
Former Students – All Emails	1 year + 30 days following graduation/withdrawal/transfer	Destroy
PC Instant Messaging	6 months	Destroy
Voice Mail Messages	30 days	Destroy
Telephone Call Records	1 year	Destroy
Providence.edu backup web content	At least 7, but not more than 30 days	Destroy
Campus Card transaction data	7 years	Destroy
CCTV Video	30 days	Destroy

## General Counsel

### Litigation Records

Record Type	Office Retention Period	Final Disposition
-------------	-------------------------	-------------------

Claims	Active + 10 years	Destroy
Deposition Transcripts	Active + 10 years	Destroy
Discovery Materials	Active + 10 years	Destroy
Litigation Files	Active + 10 years	Destroy
Judgements	Permanent	General Counsel
Settlements	Permanent	General Counsel
Releases	Permanent	General Counsel
Court Orders	Permanent	General Counsel
Consent Orders	Permanent	General Counsel

### Patents & Trademarks

Record Type	Office Retention Period	Final Disposition
-------------	-------------------------	-------------------

Invention Assignment Forms	Permanent	General Counsel
Intellectual Property Licensing Agreements	Permanent	General Counsel

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Original Patents, Trademarks & Related Work Papers	Permanent	General Counsel
Royalty Records	Life of Intellectual Property + 6 years	Destroy

### Human Resources

#### Employment Listings & Applications

Record Type	Office Retention Period	Final Disposition
Job Classifications, Announcements & Advertisements	1 year	Destroy
Applications Materials – Individuals Not Hired	1 year	Destroy
Background Investigation Results	Active + 3 years from separation	Destroy
Search Committee Records (including resumes, applications, and all search materials)	Active + 3 years from separation	Destroy

#### Individual Employee Files

Record Type	Office Retention Period	Final Disposition
Employee Personal Files (application, resume, payroll, appointment/salary forms, medical records, leave of absence, training compliance records, etc.)	Active + 3 years from separation	Destroy
Attendance Records	Active + 3 years from separation	Destroy
Performance Evaluations	Active + 3 years from separation	Destroy
Disciplinary Warnings and Actions	Active + 3 years from separation	Destroy
Individual Grievance Files	Active + 3 years from separation	Destroy
Emergency Contacts	Active + 3 years from separation	Destroy
Notice of Layoff or Termination	3 years from the action	Destroy
Personnel Actions	Active + 3 years from separation	Destroy
FMLA Leave Notices	Active + 3 years from separation	Destroy
Leave Requests	Active + 3 years from separation	
Occupational Injury or Illness Log	6 years	Destroy
Occupational Exposure and related Medical Records	30 years from separation	Destroy
Job Reclassification Requests	3 years from separation	Destroy

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Employee Sexual Harassment Complaints, Investigation & Findings	3 years from separation	Destroy
Union Grievances	1 year following expiration of then-current collective bargaining agreement	Destroy
ADA Accommodation Requests	3 years after separation	Destroy
Individual Contracts of Employment	Active + 10 years (retained in GC office after 3 years)	Destroy

### General Files

Record Type	Office Retention Period	Final Disposition
EEO-6 Reports	3 years	Destroy
Collective Bargaining Agreements	Permanent	Human Resources
IRS Form I-9	6 years	Destroy
Superseded Employee Manuals	10 years after date superseded	Archives
Federal Reporting: Welfare Benefits & Other Fringe Benefit Plans (i.e., 5500s)	Permanent	Human Resources

### Employee Benefits

Record Type	Office Retention Period	Final Disposition
Plan Documents and All Attached Amendments	Permanent	Human Resources
Plans Filed with Department of Labor & IRS	Permanent	Human Resources
Plan Administrator Records	Permanent	Human Resources
Employee Personal Information (name, address, SSN, period of employment)	3 years after death of eligible employee and beneficiary	Destroy
Employee Eligibility for Benefits	3 years after death of eligible employee and beneficiary	Destroy
Employee Service Record	3 years after death of eligible employee and beneficiary	Destroy
Record of Benefits Paid to Employees or Beneficiaries	6 years after death of eligible employee and beneficiary	Destroy
Record of Educational Assistance	6 years after death of eligible employee and beneficiary	Destroy
Actuarial Records	6 years	Destroy

## Institutional Advancement

Record Type	Office Retention Period	Final Disposition
Endowed Fund Agreements	Permanent	Institutional Advancement
Planned Gift Records (trusts, life income, annuities and real estate gifts)	Permanent	Institutional Advancement
Gift Annuity Contracts	Permanent	Institutional Advancement
Trust Documents	Permanent	Institutional Advancement
Wills and Estate Documents	Permanent	Institutional Advancement
Alumni Directories	Permanent	Institutional Advancement (with copy to Archives)
Providence College Magazine	5 years	Archives
Grant Proposals/Solicitations	Permanent	Institutional Advancement
Fundraising Solicitation Materials (including electronic solicitations)	3 years	Destroy
Employee Directories	5 years	Archives
Volunteer Confidentiality Agreements	10 years	Destroy
Contact Reports	Permanent	Institutional Advancement
Stewardship Endowment Reports	Permanent	Institutional Advancement
Grant Stewardship Reports	Permanent	Institutional Advancement
National Alumni Association Council Election – Voting Results	3 years	Destroy
Commercial Videos	Permanent	Archives
Consent for photos and videotapes	So long as photo/video footage in use + 11 years after destroying image or footage	Destroy

## Institutional Diversity, Equity and Inclusion

Record Type	Office Retention Period	Final Disposition
Title VI & Bias Reporting Investigation Materials	3 years from relevant person's separation/graduation/departure, unless still open at departure date in which case three years from closure	Destroy
Program Materials (e.g. training materials, audits, research materials, grant award materials)	5 years	Destroy

## Mission & Ministry

Record Type	Office Retention Period	Final Disposition
Program Files	4 years	Destroy
Sacramental Records	Permanent	Maintained at Parish Office of St. Pius V

## Public Safety

Record Type	Office Retention Period	Final Disposition
Incident & Crime Reports	7 years, unless report relates to an ongoing investigation in which case it must be retained for the length of the investigation + 7 years	Destroy
Audio/Phone Recordings	30 days, unless report relates to an ongoing investigation in which case the footage must be retained for length of investigation + 7 years	Destroy
Property Damage Reports	5 years after report date	Destroy
Clery Act Files (annual security report and statistical backup for Clery Act statistics)	End of calendar year + 7 years	Destroy
Tickets	5 years	Destroy
Parking Records	5 years	Destroy
Daily Shift Reports	5 years	Destroy
Payment/Billing Vouchers	5 years	Destroy
Gate Entry Visitor Logs	5 years	Destroy



# PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

## Student Affairs

### Career Education & Professional Development

Record Type	Office Retention Period	Final Disposition
Annual Report to VP	7 years	Destroy
Graduate Survey Records	Permanent	Career Services
Career Planning Files	Active + 5 years	Destroy
Employment Recruitment Files	3 years	Destroy

### Health Services

Record Type	Office Retention Period	Final Disposition
Student Health Center Treatment Records (including vaccination records)	7 years after separation (for students, graduation or last date of attendance)	Destroy
Client Counseling Records	7 years after separation (for students, graduation or last date of attendance)	Destroy

### Counseling Services

Record Type	Office Retention Period	Final Disposition
Client Counseling Records	7 years after separation (for students, graduation or last date of attendance)	Destroy

### Student Life

Record Type	Office Retention Period	Final Disposition
Alcohol and Drug Intervention Files	5 years from graduation or date of last attendance	Destroy
Disciplinary Records – Dismissal, Suspension and Deferred Suspensions	Permanent	Office of the Student Dean
Disciplinary Records – all others	7 years from incident that initiated disciplinary action	Destroy
Homeland Security Records for International Students	5 years from graduation or date of last attendance	Destroy
Orientation Guide & Materials	Active + 7 years	Destroy
Event Forms	Active + 1 year	Destroy
Student Handbook	Until Superseded	Archives

## PROVIDENCE COLLEGE RECORD RETENTION AND DESTRUCTION POLICY

Student Organization Constitutions, Bylaws and Other Materials	Until Superseded or Outdated	Archives
Student Organization Budgets	5 years	Destroy
Residence Life Records (room condition check list, student damage charge summary, hall sign-in sheets, etc.	3 years	Destroy
Intramural & Recreational Sports – Participant Liability Waivers	7 years beyond the end of the program year	Destroy
Title IX Investigation Materials	3 years from relevant person’s separation/graduation/departure, unless till open at departure date in which case three years from closure	Destroy
ADA Student Records – Specific to Housing and Dining Requests	7 years from graduation or withdrawal	Destroy
Student CARE Records	7 years from graduation or withdrawal	Destroy
Medical Leave of Absence	7 years from graduation or withdrawal	Destroy
WDOM FCC Licensing and Licensing Renewals	Permanent	Office of the Student Dean
WDOM Miscellaneous Materials	Permanent	Office of the Student Dean
Orientation Program Volunteer Release Forms	Active + 3 years from the program date	Destroy
Orientation Leader Staff Agreement Form	Active + 1 year from the program date	Destroy
Intramural & Recreational Sports – Injury Reports	7 years after end of the program year	Destroy
Student Driver/Passenger Liability Waivers	3 years from graduation or withdrawal	Destroy
Student Activities Liability Waivers	3 years from graduation or withdrawal	Destroy
Dormitory Guest Logs	7 years	Destroy