
Community College of Beaver County

INSTITUTIONAL PROCEDURES for Records / Document Retention

Purpose

The records of Community College of Beaver County (“College”) are important assets. College records include essentially all records produced whether in paper or electronic format. The law requires the College to maintain certain types of business records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject the College to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the College in contempt of court, or seriously disadvantage the College in litigation.

The College expects all employees to comply fully with any published records retention or destruction procedures and schedules. If an employee believes or is informed that College records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), those records are to be preserved until the College’s solicitor determines the records are no longer needed. Any directive from the College’s solicitor to maintain records beyond the destruction schedule supersedes any previously or subsequently established destruction schedule for those records. Questions regarding the possible applicability of that exception should be directed to the Vice President responsible for compilation and maintenance of those records.

Scope

From time to time the College establishes retention or destruction procedures or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

Student Records

State and federal statutes require the College to keep certain records pertaining to student admission, academic, financial aid and other records maintained by the Office of the Registrar. The College should also keep any correspondence relating to students written to or from the College or individual employees under applicable state and federal statutes. Student records should be retained in perpetuity.

Accounting

Tax records include, but may not be limited to, documents concerning payroll, expenses, business costs, accounting procedures, and other documents concerning the College's revenues, expenses and

property. Accounting records should be retained for at least six years from the date of filing the applicable return.

Employment Records/Personnel Records

State and federal statutes require the College to keep certain recruitment, employment, and personnel information. The College should also keep personnel files that reflect performance reviews and any complaints brought against the College or individual employees under applicable state and federal statutes. The College should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Employment and personnel records should be retained for six years after the employee terminates from the College.

Board and Board Committee Materials

Meeting minutes should be retained in perpetuity in the College's minute book. A clean copy of all Board and Board Committee materials should be kept for no less than three years by the College.

Press Releases/Public Filings

The College should retain permanent copies of all press releases and publicly filed documents under the theory that the College should have its own copy to test the accuracy of any document a person or governmental agency can theoretically produce against that College.

Legal Files

The College Solicitor should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of ten years.

Recruiting and Promotional

The College should keep final copies of recruiting and promotional documents for the same period of time it keeps other business files, generally three years.

Contracts

Final, execution copies of all contracts entered into by the College should be retained. The College should retain copies of the final contracts for at least ten years beyond the life of the agreement.

Electronic Mail

E-mail that needs to be saved should be either:

- Printed in hard copy and kept in the appropriate file; or
- Downloaded to a computer file and kept electronically or on disk as a separate file.

The retention period depends upon the subject matter of the e-mail, as covered elsewhere in this procedure.