Record Retention Policy

Policy Statement

Manhattanville College is committed to following best practices for the systematic review, retention, and destruction of College Records. It is the responsibility of each individual employee, student, and member of the College community to follow the Record Retention Policy for Records they create and retain for the periods of time necessary to satisfy the College’s business and legal obligations.

Entities Affected by the Policy

All Manhattanville College Board of Trustees members, employees, and Registered Student Organizations

Policy Background

No comprehensive policy addressing this issue previously existed. This policy supersedes the Record Retention and Disposal Policy set forth in the Employee Handbook. The changes are necessitated for uniform compliance by all entities associated with the College.
Retention of College Records
Retention of College Records are maintained based on the Record’s Life Cycle, meaning that Records are created, used, and retained permanently or destroyed. At the creation phase, the office creating the Record may not be the ultimate Office of Record. The Office of Record may or may not be the creator of the original Record. During the use phase, Active Records are accessed frequently and may exist in multiple offices. Once a Record is no longer being used frequently but has not met the retention requirements, the Record moves to an Inactive Record status and ultimately will either be retained permanently or destroyed.

The retention time of a College Record or Record Series varies per type and function of each Record or Series. Records should be maintained for the period of time indicated in accordance with the Record Retention Schedule (Appendix A). Note that the Record Retention Schedule refers to various copies of Records. Working copies may be used by offices for convenience purposes, but have a much shorter retention time than official Record copies since they are not official Records.

Destruction of College Records
Once a Record has met the retention time indicated by the Record Retention Schedule, the Record may be disposed of as long as no legal action or Preservation Directive is pending pertaining to the Record. In order to dispose of a Record, a Certificate of Disposal must be filled out and sent to the College Record Administrator to provide an audit trail for the disposition. Unless the Record Retention Schedule specifically denotes a separate retention time for copies, working copies do not require a Certificate of Disposal. Records containing confidential information must be shredded while non-confidential Records may be recycled. If a Record is not specifically listed on the Record Retention Schedule, contact the College Record Administrator for guidance.

Transmittal of Permanent College Records
Records deemed as permanent per the Record Retention Schedule should be transferred to the Office of Record when they no longer serve an active need in the originating or current user office. For example, permanent student academic files should be transferred to the Registrar’s Office. Before transmitting to the Office of Record, files should be examined to ensure that only permanent Records are being transferred and the permanent Records should be organized for storage. A Record Transmittal form should be filled out, complete with a detailed list of contents, and sent to the Office of Record. If confidential Records are included within the transmittal, the Office of Records must be notified prior to transmittal.

College Record Advisory Board
The College Record Advisory Board shall provide assistance and support to the College Record Administrator. The Board shall serve as an advisory board on all College Records management related issues and shall serve as an advocate for the proper retention, storage, and destruction of Records working toward consistency with industry’s best practices.

Responsibilities
2.

**Administrative and Academic Units**
- Designating a primary Record Management Liaison to the College Record Administrator and ensuring the designated person has opportunity and time for training on record retention
- Transmitting Permanent Record to the appropriate Office of Record, i.e., College Archives, Registrar, etc.
- Managing Records in accordance with College requirements, in compliance with applicable federal and state laws, and in compliance with the Record Retention Schedule
- Ensuring that information of a sensitive or confidential nature is protected from unauthorized disclosure throughout the Record Life Cycle.

**College Record Administrator**
- Coordinating the Record Retention Policy
- Responsible for ensuring updates to the Record Retention Schedule in compliance with federal and state Record retention policies
- Providing training and ongoing assistance for Record Management Liaisons and other individuals assigned with Record management responsibilities
- Chairing the College Record Advisory Board

**College Record Advisory Board**
- Serving as an advocate for addressing College-wide issues pertaining to Record management, including advocating for compliance with industry’s best practices
- Identifies and makes recommendations to the College Record Administrator regarding compliance with federal and state Record retention laws

**Faculty/Staff**
- Managing Records in accordance with College requirements in compliance with Record Retention Schedule
- Ensuring that information of a sensitive or confidential nature is protected from unauthorized disclosure throughout the Record Life Cycle
- Assisting in identifying and preserving Record of vital or historical value to the College

**Faculty/Staff Committees (includes Department, School, College, Faculty Assembly, and Staff Assembly Meetings and Committee Meetings)**
- Managing Records in accordance with College requirements in compliance with Record Retention Schedule
- Ensuring that information of a sensitive or confidential nature is protected from unauthorized disclosure throughout the Record Life Cycle
- Assisting in identifying and preserving Record of vital or historical value to the College
Office of Record
- Housing and maintaining Records as designated by the Record Retention Schedule

President
- Responsibility to establish a Records Retention Policy

Record Management Liaison
- Ensuring that faculty and staff in their academic or administrator unit are educated on Record Retention policies and procedures
- Serving as a reference for Record questions
- Ensuring Certificates of Disposal and maintenance of Permanent Record are properly executed
- Reporting any Record issues, e.g., discrepancies in the Record Retention Schedule, to the College Record Administrator

Registered Student Organizations
- Manage Record in accordance with College requirements in compliance with the Record Retention Schedule
- Ensure that information of a sensitive or confidential nature is protected from unauthorized disclosure throughout the Record Life Cycle
- Assist in identifying and preserving Record of vital or historical value to the College

Definitions

Record
- Written or printed instrument, regardless of format, that contains information regarding specific College educational and business transactions
- Following are types of Records:
  **Active Record**
  Record that is used and needed to perform current operations, is accessed frequently, and usually located near the user
  **Archival Record**
  Permanent Record that has been deemed to have historical value that warrants continuing preservation
  **Convenience Records**
  A non-permanent copy of a Record maintained by the College for the ease of convenience of the College
  **Inactive Record**
Record that is not consulted frequently but that must be retained because it has not yet met the full retention requirements or for other legal, operational, historical, or scholarly reasons

**Permanent Record**

Record that has been determined to have sufficient historical, administrative, legal, fiscal, or other value to warrant continuing preservation.

**Certificate of Disposal**

- A form used to document the destruction of a specified Record series based on the Record Retention Schedule

**College Record Advisory Board**

- Serves as an advisory board on Record management related issues
- Consists of the following ex-officio voting members:
  - College Record Administrator, Registrar, General Counsel, and one representative from the Offices of the Provost, Student Affairs, Human Resources, and Finance.
- Meets at least once a semester

**Confidential Information**

- Personally identifiable or sensitive information including, but not limited to, social security numbers, College identification numbers, student grade information, sensitive reports, medical record, student disciplinary record, personnel record, counseling and disability record, etc.

**Creating Unit**

- Office in which a specific Record originates

**Disposition**

- A final administrative action taken with regard to Record, including destruction, transfer to another entity, or permanent preservation

**Library – Archives**

- Holding fall into four general categories: processed records, unprocessed records, photographs, and publications

**Library – Special Collections**

- Department of the Library overseeing the Rare Books and Archives units
- Rare Books Collection consists of approximately 2500 books ranging from medieval manuscript books to modern first editions, as well as 10 manuscript collections and 18 miscellaneous artifacts, textiles, manuscript leaves and works of art
Office of Record
- Official repository designated by the College President to maintain the Record or official copy of a particular Record
- May or may not be the creator of the original Record but is ultimately responsible for its maintenance.

Preservation Directive
- Communication issued as a result of current or anticipated litigation, audit, or government investigation

Record Life Cycle
- Length of time a Record is kept before it is destroyed

Record Management
- Strategy used to identify, organize, maintain, access, store, and dispose all of the Record created or received by the College in its day-to-day operations. These Record can be electronic, paper, or virtually everything that passes through the College’s doors.

Record Retention
- System that automatically determines what should be done with particular Record at a certain period of time

Record Retention Schedule
- A comprehensive list of Record Series, indicating for each the length of time it is to be retained, which is the Office of Record, and what is the disposition schedule

Record Series
- Record of a specific kind or type of transaction

Record Storage
- Depending upon the Record Series, the Office of Record must ensure appropriate, sufficient, and secure storage in accordance with industry’s best practices for all Records.

Violations of the Policy

Violations of this Policy will be handled in accordance with the procedures in the Employee Handbook and Student Handbook.

Interpreting and Implementing Authority
College Record Administrator

**Statutory or Regulatory References**

Commissioner’s Regulations 8 NYCRR Part 188

**Relevant Links**

Fordham Record Retention and Disposal Policy
https://www.fordham.edu/info/21366/policies/2785/records_retention_and_disposal_policy

Pace Record Retention and Disposal Policy
https://www.pace.edu/finance-planning/sites/pace.edu.finance-planning/files/Policies_Procedures/Pace_University_Record_Retention_Policy_112612.pdf

St. John’s Guidelines for Record Disposition and Storage

State University of New York Record Retention
http://system.suny.edu/compliance/topics/records/records-retention/

**Policy Adoption Review and Approval**

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