



Becker College Record Retention and Destruction Policy

PURPOSE:

The purpose of this Policy is to ensure that necessary records and documents of Becker College are adequately protected and maintained and to ensure that records that are no longer needed by Becker College, or are of no value, are discarded at the proper time. This Policy is also for the purpose of aiding employees of Becker College in understanding their obligations in retaining and destroying both paper and electronic documents - including e-mail, Web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files or paper documents.

POLICY:

This Policy represents Becker's procedures regarding the retention and disposal of paper or electronic records.

ADMINISTRATION:

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical and electronic records of Becker College. The Chief Information Officer and Chief Financial Officer (the "Administrators") are the individuals in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

DOCUMENT DESTRUCTION:

In accordance with Massachusetts law and Becker's Data Classification Policy, any documents containing personal or sensitive information should be destroyed so that the information cannot be practically read or reconstructed. For paper documents, this means that personal or sensitive data should be destroyed with a cross-cut shredder; for electronic documents, personal or sensitive data should be destroyed or erased with scrubbing technology, degaussing technology or through other means of physical destruction where the information cannot be practically read or reconstructed. For complete details of what is considered personal or sensitive data, please refer to [Becker's Data Classification Policy](#).

SUSPENSION OF RECORD DISPOSAL IN EVENT OF LITIGATION OR CLAIMS:

In the event Becker College is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Becker College or the commencement of any litigation against or concerning Becker College, such employee shall inform the Chief Financial Officer and any further disposal of documents shall be suspended until such time as Chief Financial Officer and/or General Counsel determines otherwise. The Chief Financial Officer shall take such steps as is necessary to promptly inform appropriate staff of any suspension in the further disposal of documents. Upon notice from the Chief Financial Officer, the e-mail account(s) of the individual(s) in question will be copied to a special directory designated for legal holds; automatic e-mail archiving for individual(s) in question will be turned off; and all backup tapes pertaining to e-mail will be removed from



the general rotation cycle and stored in a designated location. Once the litigation is terminated or settled, the Chief Financial Officer will notify the appropriate individuals so that tapes can be put back into general rotation, archiving can be turned back on and copies of e-mail accounts stored in the legal hold area can be deleted.

APPLICABILITY:

This Policy applies to all physical and electronic records generated in the course of Becker College's operation, including both original documents and reproductions. However, many items are no longer generated or stored in paper form, but can be generated into paper from electronic records as needed.

ENFORCEMENT:

Any person that violates this policy will be subject to the same disciplinary actions as outlined in Becker's Confidentiality Agreement.

APPROVAL:

Approved by Becker's Information Security Advisory Committee on January 14, 2013.

REVIEW CYCLE:

This program will be reviewed and updated as needed, at least annually.



Appendix A - Record Retention Schedule

Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Corporate Records	Organization Records	Form 1023, Articles of Incorporation, By-laws, Copyright and Trademarks, Insurance Records, Insurance Policies	Permanent	Permanent	Pattie Kalinowski
		Press Release & Public Findings	Permanent	Permanent	Amy Dean
	Trustee	Meeting Minutes & Other Board Materials	Permanent	Permanent	Pattie Kalinowski
	Publications	Catalogs, Commencement Program, Schedule of Classes *Schedule of classes is only electronic; Commencement is paper only	Permanent	Permanent	Heather Pecoraro/ Amber Vaill
	Reports	Degree, Enrollment, Grade, and Race Statistics *Electronic only for these items	N/A	Permanent	Vera Mauk
Legal	Legal/IP	Legal Files	10 years	10 years	David Ellis
		Intellectual Property & Trade Secrets	Life of trade secret	Life of trade secret	David Ellis
		Form 990 or 990 EZ	7 years	7 years	David Ellis
	Contracts	Contracts, leases, license & other legal documentation	3 years after life of agreement	3 years after life of agreement	David Ellis
	Insurance	Insurance/Certificates of Insurance for Vendors	Permanent	Permanent	Ken Cameron/ David Ellis
Risk Management	Insurance	Property, liability, travel, etc.	10 years	10 years	Ken Cameron/ David Ellis
Title IX/ Discrimination	Report Records	Official records of relevance to reports and investigations of Title IX and discrimination related violations.	Permanent	N/A	Michelle Fatcheric
College Advancement	Donor Files	Constituent Records, Life Income Agreements, Endowment Information, Planned Giving Information	Permanent	Permanent	Jennifer DeMaio/ Christine Meola
	Gift Receipts	Gift Receipts	N/A	3 years	Jennifer DeMaio/ Christine Meola



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Records Manager
Finance	Accounts Payable	A/P Ledgers, Invoices, Check Requests, Wire Transfers, Journal Entries	7 years	7 years	Richard Naylor/ David Ellis
	General Accounting	Bank Statements, reconciliations, cancelled checks (maintained by bank)	3 years	6 years	Richard Naylor/ David Ellis
	Student Accounts/ Cashier's Office Grant Accounting	Deposit Slips, supporting documentation and reconciliations, Loan Disbursement Rosters	3 years	6 years	Alex Hartman/ David Ellis
		Grant contracts, budgets, reports, time and effort certification	3 years after close of grant	6 years	David Ellis
	Payroll	Indirect Cost Rate Calculation	6 years	6 years	Richard Naylor/ David Ellis
		Annual Payroll Records (W2),1099, 1042, Deduction Authorization (W4) Collective Bargaining Agreements, Income records (auto, moving expenses), Payroll Registers	3 years	6 years	Richard Naylor/ David Ellis
		Time Cards, deductions, individual employee pay records (student or employee)	6 years	6 years	Richard Naylor/ David Ellis
	Permanent Records	External auditor records, Annual Financial Statements, Fixed Asset Recording Records (Deeds), A-133, NCAA Audit, MOSFA Audit	Permanent	Permanent	Richard Naylor/ David Ellis



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Employee Records	Existing Employees Records*	Employee Personnel File (Application, Performance Appraisals, Merit, Salary, etc. for staff and administrators; Contracts for Adjunct and Full-Time Faculty)	6 years after separation	6 years after separation	Kathy Garvey
		Faculty Personnel File (Biographical, application, transcripts, etc.)	6 years after separation	6 years after separation	Kathy Garvey
		Faculty Resumes and transcripts-School of Humanities	6 years after separation	6 years after separation	Amber Vaill
		Faculty Resumes and transcripts-School of Design & Technology	6 years after separation	6 years after separation	Alan Ritacco
		Faculty Resumes and transcripts-School of Nursing & Behavioral Sciences	6 years after separation	6 years after separation	Laurie Hillson
		Faculty Resumes and transcripts-School of Animal Studies & Natural Sciences	6 years after separation	6 years after separation	Julie Bailey
		Faculty Appointment Negotiation Records (promotion & tenure information)	7 years	7 years	Kathy Garvey
		Visiting scholars and Post-Doc records (vitae, emails, etc.)	6 years after separation	6 years after separation	Kathy Garvey
		Immigration	6 years after termination	6 years after termination	Kathy Garvey
		19	3 years after termination	3 years after termination	Kathy Garvey
		Benefits (certificates of insurance, policies, contracts for benefits, etc.)	6 years	6 years	Kathy Garvey
		Special Arrangements/Severance Agreements	Permanent	Permanent	Kathy Garvey
		OSHA/Workers Compensation Illness and Injuries	30 years	30 years	Kathy Garvey
		OSHA logs of occupation injuries/illnesses	6 years after creation	6 years after creation	Kathy Garvey

*Please note that for all categories that read 6 years after separation, records should technically not be destroyed for 6 years + 1 day after separation.



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Records Manager
Employee Records	Existing Employees Records	Medical/Personal File	6 years after termination	6 years after termination	Kathy Garvey
		Position Description Documents	Permanent	Permanent	Kathy Garvey
	FMLA	Dates of FMLA leave, notices, disputes, notes, etc.	4 years after termination	4 years after termination	Kathy Garvey
	Union	NLRB certificates	6 years from the last effective date	6 years from the last effective date	Kathy Garvey
		Collective Bargaining Agreement	Permanent	Permanent	Kathy Garvey
	Other	Unemployment Insurance	7 Years	7 Years	Kathy Garvey
		Retirement (ERISA)	6 years after filing	6 years after filing	Kathy Garvey
Employment General	Search Records	Position File (including cv's, letters, copies of ads, search waivers and background checks, etc.) for individuals not hired	13 months from date position filled	13 months from date position filled	Kathy Garvey
	IPEDS	All data used to complete IPEDS survey	Permanent	Permanent	Kathy Garvey
	Vets 100	Federal Contractor Veterans Employment Report	Permanent	Permanent	Kathy Garvey
	Affirmative Action	Affirmative Action (Public or Private and supporting reports)	Permanent	Permanent	Kathy Garvey



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Recruit & Applicant (Undergrad & Graduate)	Recruits/ Applicants that do not enter	Acceptance Letters, AP records, Applications, correspondence test scores, medical records, recommendations, Military documents, placement test information, transcripts & international student documents	3 years after application term	3 years after application term	Michael Perron/ Frank Millerick
	Recruits/ Applicants become students	Recruitment materials	Dispose after enrollment	Dispose after enrollment	Michael Perron/ Frank Millerick
Accelerated Recruit & Applicant	Recruits/ Applicants that do not enter	Acceptance Letters, AP records, Applications, correspondence test scores, medical records, recommendations, Military documents, placement test information, transcripts & international student documents	3 years after application term	3 years after application term	Amber Vaill
	Recruits/ Applicants become students	Recruitment materials	Dispose after enrollment	Dispose after enrollment	Amber Vaill



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Student	Students/ Applicants that enroll	Permanent File (Acceptance Letter, Application, Transcripts, DAS, 120, Name Changes)	Permanent	Permanent	Heather Pecoraro/ Amber Vaill
		Temporary File (AP records, correspondence, test scores, Military documents, placement test information)	5 years after graduation/ date of last attendance	Permanent in Colleague	Heather Pecoraro/ Amber Vaill
		International Student Documentation	3 years after date of last attendance	N/A	Michelle Fatcheric/ Frank Millerick
		Housing Information (Housing Placement Forms, Housing Agreements, etc.)	5 years after graduation/ date of last attendance	Permanent in Colleague	Joseph Lomastro/ Frank Millerick
		Medical Records	10 years after graduation/ date of last attendance	10 years after graduation/ date of last attendance	Cathy Meloche/ Frank Millerick
		Counseling Records	10 years after graduation/ date of last attendance	10 years after graduation/ date of last attendance	Rose Andrejczyk Frank Millerick
		Student Health Insurance	10 years after graduation/ date of last attendance	10 years after graduation/ date of last attendance	Alex Hartman/ David Ellis
	Students/ Applicants that enroll	Requests for Formal Hearings, Requests/Disclosures for PII, Student Statements, Written Decisions, Student Requests for Nondisclosure, Students Written Consent, Waivers	Permanent	Permanent	Heather Pecoraro/ Frank Millerick
	FERPA				Heather Pecoraro/ Amber Vaill



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Records Manager
Student	Registration/ Academic Records	Academic Action Authorizations (Dismissal, Probation)	5 years after graduation or date of last attendance	Permanent in Colleague	Heather Pecoraro/ Amber Vaill
		Academic Advising Correspondence	5 years after graduation or date of last attendance	Permanent Starfish	Richard Davino/ Amber Vaill
		Correspondence, Credit by Exam Scores (AP, CLEP, etc.), curriculum change authorizations, degree audits, Grade Authorizations, Transfer Credit evaluations	5 years after graduation or date of last attendance	Permanent in Colleague	Heather Pecoraro/ Amber Vaill
		Applications for Graduation, Class Schedules, Personal data information forms	5 years after graduation or date of last attendance	Permanent in Colleague	Heather Pecoraro/ Amber Vaill
		Audit Authorizations, Add/Drop, Grade Reports, Pass/Fail Requests, Enrollment Verifications, Social Security Certifications	5 years after graduation or date of last attendance	5 years after graduation/ date of last attendance	Heather Pecoraro/ Amber Vaill
		Transcript Requests	1 year after date submitted/ performed	Permanent in Colleague	Heather Pecoraro/ Amber Vaill
		Academic Records, Change of Grade Forms, graduation lists	Permanent	Permanent	Heather Pecoraro/ Amber Vaill
Student	Conduct Records	Conduct Records	5 years after graduation/ date of last attendance	5 years after graduation/ date of last attendance	Joseph Lomastro/ Frank Millerick



Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Student	Financial Aid	SFA Program Records (participation agreement)	Permanent	Permanent	Allen Cowett/ David Ellis
		Fiscal Operations Report (FISAP), all other records/reports	Permanent	Permanent	Allen Cowett/ David Ellis
		SFA Recipient Records (SAR, ISIR, DoE, eligibility, Financial Aid history, etc.)	7 years from last date of attendance	7 years from last date of attendance	Allen Cowett/ David Ellis
		Requirements for Specific Aid (Campus Aid, Pell Grant)	7 years from last date of attendance	7 years from last date of attendance	Allen Cowett/ David Ellis
		Borrowers eligibility records	7 years from last date of attendance	7 years from last date of attendance	Allen Cowett/ David Ellis
		Disbursement Files (ASA, ELM)	7 years from last date of attendance	Permanent in Colleague	Allen Cowett/ David Ellis
		Perkins Original Promissory Note	7 years after PIF	N/A	Allen Cowett/ David Ellis
	HEA Requirement	Crime Statistics, Security Report, SRK	Permanent	Permanent	Richard Menard/ Frank Millerick
		Athletic Participation	5 years from date of disclosure or required disclosure	5 years from date of disclosure or required disclosure	Frank Millerick/ David Ellis
		Institutional Information (cost of attendance, etc.)	Permanent	Permanent	David Ellis
	International	SEVIS F-1 and M-1	3 years after student leaves	N/A	Michelle Fatcheric/ Frank Millerick