



## Manual of Policy and Procedures

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### PURPOSE

The Vermont State Colleges are committed to protecting the security and integrity of official records created or maintained by the colleges or system. This policy is designed to:

1. Comply with federal, state or other legal requirements for records storage and retention.
2. Protect the privacy of students and employees of the VSC.
3. Optimize the use of space.
4. Minimize the cost of storage.
5. Ensure the preservation of records of permanent value.
6. Ensure that records no longer needed to satisfy legal, regulatory or other requirements are disposed of in a timely and appropriate manner.
7. Ensure that records retention policies, schedules and procedures are reviewed and modified as necessary to respond to changes in technology or regulations.

### STATEMENT OF POLICY

Official records must be retained for a period of time necessary to meet the operational, administrative and legal requirements of the Vermont State Colleges, and official records must be destroyed according to established destruction schedules. Records retention and disposition schedules apply to official records of all formats, including paper records and all electronic records systems (e.g., documents, databases, email, and materials in imaging systems). The VSC encourages the use of storage methods that eliminate waste, reduce cost and promote efficiency.

Many records subject to records retention requirements contain confidential (non-public) information that is protected by FERPA, Gramm-Leach-Bliley, HIPPA and other federal and state laws designed to ensure privacy. The VSC maintains guidelines for the storage and exchange of public and private information.

### **Records Storage**

VSC offices must maintain college and system records in a manner that provides reasonable (1) access for faculty and staff to carry out regular job responsibilities, and (2) protection against misuse, misplacement, loss, destruction, damage, or theft.

Offices should maintain paper records in an environment that is free of pests, flooding, fire hazards, and unusual moisture, heat, and dust. Paper records will be stored in fireproof file cabinets:

- 1) as required by law;
- 2) in the case of deeds, loan/bond documents and tax documents with original signatures; and
- 3) where such storage is available for all other official documents.

Employees will take precautions not to leave official paper records unattended on desks or in unlocked files or drawers while in the course of doing business.

Duplicate files, duplicate copies, library materials, and stocks of obsolete forms or pamphlets originally intended for distribution are not considered to be official records or record copies. Duplicates or non-record convenience copies should be destroyed when they cease to be useful and should not be kept longer than the official record copy.

Official records maintained electronically must be stored using IT Services approved storage methods to ensure adequate security. VSC IT Services will develop and monitor systems to ensure the security and safety of electronic data storage.

### **Records Retention**

The VSC Records Retention Schedule provides a list of official records for each functional area across the colleges and prescribes the periods of authorized retention. The schedule may be revised periodically—upon approval by the Chancellor—to include a newly created record series, to change retention periods, or to delete a record series no longer useful.

All official records (paper, electronic, or any other media) will be retained for the minimum periods stated in the VSC Records Retention Schedule. Notwithstanding such minimum retention periods, all records must be maintained until all required audits are completed and should be retained beyond the listed retention periods when there is a probability of litigation either involving records or requiring their use. Special consideration must be made to ensure that granting agency requirements, where they exceed the Records Retention Schedule, are observed and met.

The administrative teams responsible for creating and maintaining the records in each section of the Records Retention Schedule also are responsible for monitoring the standards for retention and management of official records, and for ensuring that records retention schedules and procedures are reviewed and modified as necessary to respond to changes in technology or

regulations. The Business Affairs Council will coordinate the regular review of the Records Retention Schedule no less than every three years.

### **Records Destruction**

After a specified period of time, official records must be disposed of in a manner that is consistent with, and systematically carried out in accordance with, prescribed records and information management guidelines and procedures

VSC records (regardless of the storage medium) may be disposed of upon reaching the minimum retention period stated in the VSC Records Retention Schedule, provided the administrative team, college or system does not need the records for future administrative, legal, research/historical, or fiscal purposes as defined below:

1. Continued administrative value for current or future VSC operations.
2. Continued legal value as they contain evidence of legally enforceable rights or obligations of the VSC.
3. Continued research or historical value as they document the purpose, growth, history, services, programs, and character of the college or system.
4. Continued fiscal value as they are required for budget development, financial reporting, or audit purposes.

Additionally, there may be the need for the declaration of a litigation document hold that requires all documents related to a specified subject be retained until further notice. Administrative teams at the colleges and in the Chancellor's Office are responsible for regularly reviewing the value and usefulness of official records. During this review, the administrative teams will identify and designate for disposal the records with elapsed retention periods according to the VSC Records Retention Schedule.

The person responsible for a given administrative team at the college or in the Chancellor's Office is responsible for authorizing the disposal of records. With authorization, paper records containing sensitive and/or confidential information will be shredded; shredded material will be disposed of properly by recycling or putting in the trash. Documents containing sensitive or confidential information will not be placed in the trash before being shredded.

With authorization, electronic records will be erased with verification that the data have been eliminated beyond recovery using IT Services approved methods.

Any activity or expense related to federal grants or contracts must comply with *2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, in addition to the provisions above.

**References**

VSC Policy 312: FERPA

VSC Information Sensitivity Policy (internal security policy)

VSC Computer Hardware Security Policy (internal security policy)

Signed by: \_\_\_\_\_  
Jeb Spaulding, Chancellor

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Chancellor