

# HOWARD UNIVERSITY POLICY

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**Policy Number:** 400-003  
**Policy Title:** RECORD RETENTION AND DESTRUCTION POLICY  
**Responsible Officer:** General Counsel  
**Responsible Office:** Office of the General Counsel  
**Effective Date:** July 1, 2009  
(Reformatted: July 14, 2011)  
(Updated: September 23, 2011)  
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## I. POLICY STATEMENT

Howard University historically and presently generates a substantial volume of records for either educational and/or administrative purposes. Policies concerning retention and proper maintenance of such records are an essential component of the University's legacy and functionality. Record retention requires that different types of records be retained for specific periods of time. These records must be managed according to procedures that are outlined in this document.

## II. RATIONALE

This Policy is designed to ensure that necessary records and documents are adequately protected and maintained by Howard University. This policy also seeks to: (1) comply with federal statutory requirements; (2) reduce risks associated with unintended disclosure of sensitive information;(3) ensure the preservation of records of permanent value and dispose of records no longer needed to satisfy legal or other requirements;(4) respond efficiently to record requests; and (5) protect vital and historical information about the University.

## III. ENTITIES AFFECTED BY THIS POLICY

All University Officials, including the Board of Trustees, the Office of the President, Deans, Directors, Department Head, and all University employees, contractors and grantees are responsible for the maintenance of University records, and anyone assessing, creating or using University records will be affected by this policy. Departments that maintain University records are responsible for establishing appropriate record retention management practices. Each department's administrative manager or a designee must:

1. Implement the unit's and/or office's record management practices;
2. Ensure that management practices are consistent with this Policy;

3. Educate staff within the administrative unit in understanding sound records management practices and this policy;
4. Ensure that access to confidential records and information is restricted;
5. Preserve records of historic value and transfer to University Archives; and
6. Destroy inactive records that have no archival value upon passage of the applicable retention period.

The department head of an office or designee having public records is responsible for ensuring compliance with this Policy and with the Public Records Act. When an employee leaves a department or the University, the department head is responsible for designating a new custodian and ensuring that the separating employee no longer has access to those records and that any public records in the separating employee's possession are properly transferred to the new custodian. The department head is responsible for contacting Enterprise Technology Services (ETS) to arrange for the transfer of the electronic records to the new custodian before the accounts are scheduled to be deleted.

#### **IV. DEFINITIONS**

- Active Records:** A record that is currently being used, or will be used, by the department that generated it. Records may remain active for a varying numbers of years, depending on the purpose for which they were created. The department has the responsibility of determining the access required and the security needed for the records.
- Confidential Records:** Records that contain confidential student, patient or employee information that should have limited access and be protected from inadvertent access or disclosure.
- Confidential Information:** Any information that is received or created that includes protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA), personal and educational information under Family Educational Rights and Privacy Act (FERPA), or any personal financial information under the Gramm-Leach-Bliley Act. This includes, but is not limited to, name, address, social security number, bank account numbers, financial or financial aid information, medical information, and student numbers.
- Electronic records:** Any record that is created, received, maintained or stored on University local workstations, central servers, laptops, or PDA's. Examples include, but are not limited to, electronic mail

(e-mail), instant messages, text messages, word processing documents and spreadsheets databases.

**Inactive University Records:** A record that is not an Active Record, but still must be maintained pursuant to the University's Record Retention Policy. Inactive University Records of historical significance are maintained by the University Archives as directed by the Records Administrator or its designee.

**Permanent Archival Records:** A record that has permanent or historic value, is inactive, and is not required to be retained in the office in which it originated or was received. Archival Records are retained and preserved indefinitely in the University Archives.

**Responsible Department:** The department designated as having responsibility for retention and timely destruction of the particular types of University Records.

**University Records:** University Records are any recording of information, regardless of the format, made or received by any department or administrative office of the University in connection with the transaction of University business or in pursuance of the University's legal obligations. University Records include all papers, books, photographs, maps, tapes, recordings, minutes, or other documentary materials.

## **V. PROCEDURES**

### **1. CORRESPONDENCE AND INTERNAL MEMORANDA**

Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records that support a project be kept with the project and take on the retention time of that particular project file.

### **2. ELECTRONIC DOCUMENTS**

Electronic Documents are University Records that are kept in electronic format. Electronic Documents is data that has been created, retained, or stored in computer systems and include, but are not limited to: emails, word processing files, administrative databases, electronic spreadsheets, schedules of daily activities, and technology resources. Retention standards that apply to University Record also apply to Electronic Documents

### **3. INFORMATION TECHNOLOGY BACKUP FILES**

ETS performs backups on a regular schedule of the e-mail and electronic files stored on central servers for disaster recovery. These backups are to be used for system restoration purposes only. The IT system administrator is not the legal custodian of messages or records which may be included in such backups. The University does not maintain central or distributed electronic archives of all electronic communications records sent or received. Electronic communications records are normally backed up, if at all, only to assure system integrity and reliability, not to provide for future retrieval, although back-ups may at times serve the latter purpose incidentally. Operators of University electronic communications services are not required by this Policy to routinely retrieve electronic communications records from such back-up facilities for individuals.

### **4. LITIGATION HOLDS**

When litigation against the University or its employees is filed or threatened, the law imposes a duty upon the University to preserve all documents and records that pertain to the issues. As soon as University Counsel is made aware of pending or threatened litigation, a litigation hold directive will be issued to the legal custodians. The litigation hold directive overrides any records retention schedule that may have otherwise called for the transfer, disposal or destruction of the relevant documents, until the hold has been cleared by University Counsel. No employee who has been notified by University Counsel of a litigation hold may alter, delete, overwrite, or re-write an electronic record that falls within the scope of that hold (including images and sounds).

E-mail and computer accounts of separated employees that have been placed on a litigation hold by University Counsel will be maintained by ETS, or other entity designated by the Office of the General Counsel until the hold is released. Each office upon notification of a legal matter must print out a hard copy of each document and maintain it in a file. Violation of the hold may subject the individual to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies. The law requires that you take affirmative steps to preserve information that is under a litigation hold. Each office must immediately disable any automatic archiving or deletion routines in its email system and on any other computer programs.

### **5. DISPOSAL AND DESTRUCTION OF RECORDS**

At the end of the appropriate retention period, inactive records and non-permanent records shall be destroyed according to the applicable schedule. The disposal process and methods should preserve the confidentiality of documents through the final point of disposition.

If a determination is made in accordance with this policy that it is appropriate to dispose of certain records, destroy them in one of the following ways:

- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Erase or destroy electronically stored data.

## **6. QUESTIONS ABOUT RECORD RETENTION OR DESTRUCTION**

Questions about this policy or your responsibilities should be directed to the Office of General Counsel at (202) 806-2650.

## **VI. SANCTIONS**

All entities noted in Section III of this policy must comport to these policies and confirm that their record keeping and retention system meets University standards. Failure to maintain records in accordance with the above policy could subject the University to liability and possibly substantial penalties under current law. Employees who fail to maintain records consistent with the policy may be subject to discipline, including termination.

## **VI. WEBSITE ADDRESS**

[www.howard.edu/policy](http://www.howard.edu/policy)

## **RECORD RETENTION SCHEDULE**

Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Howard University and the retention and disposal of electronic documents. If there are inconsistencies in the required retention periods, the longer period should be followed. Neither the procedures nor tables that follow are meant to be an all-inclusive listing for retention purposes, but rather guides for the more frequent or commonly used records that need to be retained. If particular records are not listed, it does not mean that they can or should be discarded or destroyed without first considering the general requirements of this policy. If there is a question, please consult the Compliance Officer (General Counsel).

### **APPENDIX A – RECORDS RETENTION SCHEDULE**

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
<b><u>ACADEMIC, STUDENT</u></b>		
Academic Actions	5 years after graduation or last day of attendance	Office of Enrollment Management
Academic Integrity Code Violations	5 years	Office of the Provost
Academic Records (including narrative evaluations, competency assessments)	Permanent	Office of Enrollment Management
Change of Course Forms	5 years	Office of Enrollment Management
Change of Grade Forms	Permanent	Office of Enrollment Management
Change to Student ID number	Permanent	Office of Enrollment Management
Class Lists (original)	Permanent	Office of Enrollment Management
Consent to Release Personally Identifiable Information	5 years	Office of Enrollment Management
Course Offerings	Permanent	Office of Enrollment Management
Enrollment Verifications	2 years	Office of Enrollment Management
Transcripts	Permanent	Office of Enrollment Management
Graduation Lists	Permanent	Office of Enrollment Management
Name Changes	5 years after graduation or last day of attendance	Office of Enrollment Management
Student Class Schedules	1 year	Office of Enrollment Management

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Term Reports	7 years	Each School/College
Transcript Request	1 year	Office of Enrollment Management
Transfer Credit Evaluations	5 years	Office of Enrollment Management
Veteran Administration Certificates	5 years	Office of Enrollment Management
Withdrawal Authorizations	2 years	Office of Enrollment Management
Advanced Placement Records	5 years	Office of Enrollment Management
Residency Change Documents	5 years	Office of Business and Fiscal Affairs
International Student Forms	3 years (Georgetown)	International Student Services
<b><u>ADMINISTRATIVE RECORDS</u></b>		
Departmental reports and files	3 years discuss with Archives before transferring	Each Office
University Policy Committees & Other School Committees	Retain until work of committee has been completed and then transfer to University Policy Office	University Policy Committee
Policy and Procedures	Permanent	University Policy Committee
Publications, articles, information about faculty, staff and students	When office no longer needs this information, transfer to Archives	Each Office
Handbooks	Retain until replaced by another. When issued send replaced copy to Archives	Each Office
<b><u>ALUMNI AFFAIRS AND DEVELOPMENT</u></b>		
Alumni Records	Permanent	Development and Alumni Relations
Gift Records	6 years	Development and Alumni Relations
Gifts of Art to the Museum	Permanent	Development, Museum
Original Gift Letter Agreements, Signed by the President	Permanent	Development

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Original Gift Agreements, All Others	Permanent	Development and Alumni Relations
Planned Gifts	Permanent	Development and Alumni Relations
<b><u>BENEFIT RECORDS</u></b>		
Description of benefits plans	Full plan period plus 1 year	Human Resources/Total Compensation
Pension Plans and ERISA Benefits	6 years after filing date	Human Resources/Total Compensation
Employee Medical Files - OSHA	30 years	Human Resources/Total Compensation
Workman's Compensation Files	7 years after filing date	Human Resources/Total Compensation
<b><u>CONTRACT RECORDS</u></b>		
Design and Construction Contracts	Life of building	PFM
Other Contracts (except research and employment)	10 years after the termination unless transfers ownership rights, then permanent	Business & Fiscal Affairs
Insurance Policies	Permanent	Risk, Estate and Asset Management
Equipment Warranties	Life of Equipment	Each Office
Claims, risk management, incident reports	5 years	Business & Fiscal Affairs and Risk , Estate and Asset Management
Real Estate acquisition & disposition documents, leases, & real estate exemptions	10 years after properties are sold or demolished then transfer to Archives	Office of Real Estate and Asset Management
<b><u>CORPORATE RECORDS</u></b>		
Accreditation Records	Permanent	Office of the President
Board of Trustees Minutes	Permanent	Office of the Secretary



<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Bylaws	Permanent	Office of the Secretary
Resolutions	Permanent	Office of the Secretary
Charter	Permanent	Office of the Secretary
<b><u>FACULTY RECORDS</u></b>		
Faculty Meeting minutes	When office no longer needs this information	Each School/College
Tenure or Promotion Dossiers	If action approved, 5 years; If tenure denied, 5 years from end of term appointment	Office of the Provost
Records of paid leaves and stipends	Permanent	Office of Provost/Appropriate Dean
<b><u>FINANCIAL RECORDS</u></b>		
Budget Files	7 years	Budget Office
Budget Recommendations	7 years	Budget Office
Consultant Services	7 years	Comptroller
General Purchasing Requisitions	7 years	Comptroller
Interdepartmental Service Charge	7 years	Comptroller
Gift Records	7 years	Advancement
Request for Cancellation	7 years	Comptroller
Request for Specialist Event Authorization	7 years	Comptroller
Request for Supplement	7 years	Comptroller
Service Request	7 years	Comptroller
Time and Attendance Reports	4 years in Comptroller's office	Comptroller

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Travel Authorization	7 years	Comptroller
<b><u>GENERAL RECORDS</u></b>		
Audio Tapes	Permanent 2 copies	University Archives
Audiovisual Records	Permanent 2 copies	University Archives
Memorabilia	Permanent (master and copy)	University Archives
Publications	Permanent 3 copies [master and (2) copies]	University Archives
<b><u>HEALTH &amp; SAFETY RECORDS</u></b>		
Records of inventory, use and control of radioactive materials	Permanent	PFM
Records of disposal or abatement of toxic and hazardous waste	3 years	PFM
Records of hazardous waste generating	3 years	PFM
Records of asbestos exposure	30 years	PFM and Human Resources
Material Safety Data Sheets	5 years	PFM
Chemical Inventories	5 years	PFM
Internal Safety Inspections	15 years	PFM
Accident Reports	Permanent	Howard University Police Department and Risk, Estate and Asset Management
Crime Reports	Permanent	Howard University Police Department and Risk, Estate and Asset Management

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Property Damage Reports	Permanent	Howard University Police Department and Risk, Estate and Asset Management
<b><u>INFORMATION TECHNOLOGY</u></b>		
Request for Telephone Services Records	2 years after service rendered	ETS
Cost Estimate for Telephone Services Records	3 years after initial services rendered	ETS
<b><u>LEGAL</u></b>		
Consent Orders	Permanent	OGC
Court Orders	Permanent	OGC
Judgments	Permanent	OGC
Releases	Permanent	OGC
Settlements	Permanent	OGC
Patents	Permanent	OGC/Research & Compliance
Conflict of Interest Disclosure Statement	3 years	OGC
Litigation Documents and Records	5 years after final disposition	OGC
Authorization for release of records, subpoenas, court order	5 years	OGC
Employee Contracts	7 years after termination	OGC/ Individual departments
Trademarks and Service marks	Permanently	General Counsel
Patents and related papers	Permanently	General Counsel and Research & Compliance
<b><u>MATERIALS MANAGEMENT RECORDS</u></b>		
Request for Purchase	5 years	Strategic Sourcing and Asset Management

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Vendor Complaint	5 years	Strategic Sourcing and Asset Management
<b><u>PAYROLL RECORDS</u></b>		
Tax Returns and worksheets	Permanently	Business and Fiscal Affairs
Timesheets	3 years	Business and Fiscal Affairs/ Payroll
Withholding tax statements	7 years	Business and Fiscal Affairs/ Payroll
Payroll records and summaries	7 years	Business and Fiscal Affairs/ Payroll
<b><u>PENSION</u></b>		
Employee Eligibility for Pension	6 years	Human Resources/ Comptroller
Employee Personal Information	6 years	Human Resources/ Comptroller
Employee Service Records	6 years	Human Resources/ Comptroller
Plan Administrator Setting Forth Authority to Pay, records of	Permanent	Human Resources/ Comptroller
Pension Paid to Employees or their Beneficiaries	6 years	Human Resources/ Comptroller
Pension Plans and All Attached Amendments	Permanent	Human Resources/ Comptroller
Pension or Pension Plans Files with the Department of Labor and Internal Revenue Service	Permanent	Human Resources/ Comptroller
<b><u>PERSONNEL RECORDS (NON-FACULTY)</u></b>		
Employees' Leave Record	Permanent Retention	Human Resources
Notice of Position Opening	1 year	Human Resources
Personnel Recommendation	Permanent Retention in local storage	Human Resources
Position Recommendation	1 year	Human Resources

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Personnel Files	6 years after termination	Human Resources
Family Medical Leave Records & Americans with Disabilities	6 years (Stored separately)	Human Resources
I-9 Forms	3 years	Human Resources
EEO & Affirmative Action Plans	3 years	Human Resources
<b><u>PFM MAINTENANCE RECORDS</u></b>		
PFM Work Request Files	3 years after work completed	PFM
Request to Transfer Property Files	1 year after property has been disposed of	PFM
Records of Underground Storage tank inspections	5 years	PFM
Records of required testing of fire protection equipment	5 years	PFM
Records of inspections, performance and repairs of emergency power plant equipment	5 years	PFM
Written report and evaluation of all external disaster plans	5 years	PFM
<b><u>REAL PROPERTY</u></b>		
Documents for leases and licenses	6 years after expiration	Real Estate & Asset Management
Property deeds, easements, licenses, rights of way, rights of first refusal, remainder interests, mortgages	Permanent	Real Estate & Asset Management
Property Tax Returns filed with taxing jurisdiction	6 years	Comptroller
Title Insurance Policies	10 years after disposal of property	Real Estate & Asset Management
Contracts for Sale or Purchase	10 years after property sold	OGC
<b><u>RESEARCH/GRANT/ SPONSORED PROGRAM RECORDS</u></b>		
Administration Records and Supporting Documents	Up to 10 years after formal grant closeout as specified by individual agency requirements	Research & Compliance

<b>RECORD CATEGORY</b>	<b>RETENTION SCHEDULE</b>	<b>RESPONSIBLE DEPARTMENT</b>
Grants	Up to 10 years after formal grant closeout unless a transfer of ownership rights, then permanent. Final report fulfilling grants to Archives	Research & Compliance
Financial Records	Up to 10 years after formal grant closeout	Research & Compliance
Scientific and Statistical Records	Up to 10 years after formal grant closeout	Research & Compliance
Protocols and related documents or grants and contracts covering use of human subjects and animals in research	Permanent	Research & Compliance
<b><u>STUDENT RECORDS</u></b>		
Student Disciplinary	5 years after graduation or 8 years after last date of enrollment	Office of Special Student Services
Student Employment	5 years after the end of the award year or reporting date	Office of Student Employment
Student Financial Aid	5 years after the end of the award year or reporting date	Office of Financial Aid
Student Health Records	5 years after graduation or date of last attendance	University Health Center
Student Veteran/Dependent of Deceased Veteran	7 years after graduation or last date of enrollment	Office of Special Student Services
Student Handbooks	Permanent	Student Affairs
ADA	7 years after graduation or last date of enrollment	Office of Special Student Services
Board Meal Plans	1 year	Bison One Card
Discretionary Spending Account (Bison Bucks, Bonus, Other)	1 year	Bison One Card