



## Policy Directory

Responsible Division: Finance and Administrative Services  
Responsible Office: Financial Services  
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## **Document Retention**

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### Policy:

Alcorn State University (ASU) is considered a Mississippi local government agency, and records created or received by ASU at any of our locations and offices are considered public records to be maintained and disposed of in accordance with § 25-59 of the Mississippi Code of 1972. The purpose for having a document retention policy is to control the creation, growth, storage and destruction of records, regardless of the form, as required by law.

The theft, or deliberate alienation, alteration or destruction of records by any person or persons in a manner not authorized by an applicable records schedule or the unlawful divulging of restricted information under the Law shall constitute a misdemeanor, punishable by fine of not less than five hundred dollars (\$500) and not greater than one thousand dollars (\$1,000.00). (§ 25-59-23).

University financial records are University property and include, but are not limited to: annual reports, budget and financial statements, government and other contracts produced or received, gifts and donor agreements, bank deposits, bank statements, cancelled checks, wire transfers, check requisitions, credit card receipts, journal entries, spreadsheets or other software programs that document calculations, memorandums, correspondences, planning, documents, receipts, e-mail messages to the extent they authorize or provide substantiating information or other documentation or individual entries made during the transaction of business. This policy applies to all original documentation supporting the accurate, applicability and method of calculation for all financial entries.

The responsibility for records management at Alcorn State University is assigned to the Department of Finance and Administrative Services through the Vice President for Finance and Administrative Services. The Department of Finance and Administrative Services shall annually review the Documentation Retention Policy (DRP), modify it accordingly and inform and educate all relevant ASU employees on any such changes. All questions relating to document retention and/or destruction should be directly addressed to the Department of Finance and Administrative Services.

It is the responsibility of each department to designate a person to be responsible for records retention. The designated person should have appropriate knowledge of departmental data.

## Ownership of Institutional Records

University records are the property of the University and do not belong to those who prepare such records or to their custodian. No employee has any persona or property right to records of the University, including those records that the employee helped develop or compile, and no employee may remove or copy such records for personal use.

The definitions are as follows:

- **Official Records:** Official Records are records with current administrative use for the generating unit. Records remain active for varying amounts of time, depending on the purpose.
- **Archival Records:** Archival Records are records that are inactive, are not retained in the office in which they originated or received and have permanent or historical value. The University Archives or the Mississippi Department of Archives and History keeps and stores archival records. Each Official Repository decides whether a record has historical value. Care must be taken not to over include records in this category. It is intended to apply only to exceptional documents for which long-term retention is in the best interest of the University because the records may be of a particular value to future University personnel. It is difficult to give a precise definition of historical value. The following general principles should be used to decide if the record has historical value: whether it describes a transaction of decisions that have lasting impact upon University facilities or programs; or whether it would serve as a necessary reference to future personnel in strategic planning.
- **Official Repository:** The Official Repository is the unit designated as having responsibility for retention and timely destruction of particular official University records. Such responsibility is assigned to the unit's administrator or a designee.
- **University Records:** These are the original and official copies of a record.
- **Permanent Records:** These are considered essential to the University's ongoing and future operations.
- **Inactive Records:** These are the records consulted infrequently (fewer than once a month for each file drawer) and are no longer needed to conduct current business.
- **Unofficial Records:** These are unofficial copies maintained in an office for convenience, rather than the Repository Office.
- **Confidential Information:** Information deemed confidential is personally identifiable information, material the University is obligated by contract to keep confidential, or records that could reasonably be used to the detriment of the University or individuals if read by others.

## Maintenance of University Records

Departments must maintain University records in a manner that provides access for faculty and staff to carry out normal job responsibilities and reasonable protection against misuse, misplacement, loss, destruction, damage or theft.

Unless authorized by the Vice President for Finance and Administrative Services, University records must be stored on University premises at all times.

Departments should document official records loaned to other departments or by describing the record, loan date, return date, borrowing department, individual and signature of the borrower.

If possible, departments should maintain records in an environment that is free from rodents, flooding, fire hazards and unusual moisture, heat and dust. The desirable environment for preserving records in a space with forced air ventilation system that maintains a controlled temperature of 65-75 degrees Fahrenheit and a relative humidity of 40-60 percent.

### Document Retention Periods

Listed below are some of the general schedules of retention required for Alcorn State University. This is not an all-inclusive list. If records are not listed, please check with the department and/or University administration. The policy lists the minimum record retention requirements for the following:

- Complying with guidelines issued by the University
- Providing maximum protection under current state statutes of limitations
- Supporting general University business practices
- Providing minimum protection under current federal statutes of limitations
- Being in accordance with Mississippi Department of Archives and History
- Providing for external entities that require specific retention periods for records

Each department should use its discretion in deciding when to dispose of records after meeting all state laws, federal laws and requirements in this policy. Departments should save time and space by properly disposing of records after satisfying requirements in this policy.

	Record Title	Record Title
	<b>Academic Support</b>	
1.	Academic files of graduate and undergraduate students	5 years from graduation or date of last attendance
2.	Department of academic files	5 years from graduation or date of last attendance
3.	Academic transcripts	Indefinite
4.	Financial aid records (applicants who do not enroll)	1 year from date of application
5.	Financial aid records (applicants who do enroll)	4 years from end of fiscal year in which aid is awarded

6.	International student forms (visa documentation, etc.)	5 years
7.	Student loan records	5 years after the loan has been repaid in full
8.	Student account records	6 years
9.	Academic calendar	Indefinite
10.	Catalogs	Indefinite
11.	Credential service files (MCAT, DAT scores)	3 years following 1 year as active
12.	Commencement programs	Indefinite
	<b>Record Title</b>	<b>Record Title</b>
<b>Academic Support Cont'd</b>		
13.	Accreditation files	7 years
14.	Academic search records	3 years from decision to hire
	<b>Academic Personnel</b>	
15.	Annual conflict of interest disclosure statements	6 years
16.	Grievances	5 years after final decision on grievance
17.	Faculty promotion and tenure	5 years after receipt of approval of tenure from President's office
	<b>Accounting and Finance</b>	
18.	All records not specified below	7 years
19.	Capital equipment records	Life of asset: Records of equipment purchased on federal funds must be retained for 3 years after final disposition
20.	Depreciation records	Life of asset
21.	Inventories	Life of asset
22.	Travel and reimbursement and attachments	7 years
23.	IRS Form 1098T and 1098E	Indefinite
24.	Trial balance reports, audited financial statements, annual reports, tax returns, internal audit working papers	10 years after release of audit (state requirement of 3 years)
25.	Financial correspondence: cashier reports, check copies, canceled checks, journal vouchers, cash receipt card, travel expense reports, check register, bank deposits, bank statements, wire transfers, check signature authorizations, bank reconciliations, invoices, cash reports, request for payment forms, stop payment requests	10 years after release of audit (state requirement of 3 years)
	<b>Admissions</b>	
26.	Applications for admissions: (high school transcripts, college transcripts, test score reports, letters of recommendations, CLEP, AP reports, admissibility calculations, admission specific correspondence)	1 year on students that apply but do not enroll
27.	Recruitment materials	Until after enrollment

<b>Advancement, Institutional</b>		
28.	Gift records (trusts, life income, agreements, annuities), real estate	Indefinite
<b>Budget Office</b>		
29.	Budget (clean, unmarked), Budgets (final copy)	Indefinite
30.	Budget (working papers)	10 years
<b>Campus Police</b>		
31.	Traffic accident reports	3 years
32.	Felony arrest reports	75 years
33.	Non-felony arrest reports	25 years
34.	Dispatch tape recordings	90 days (serious incidents may warrant longer retention at the discretion of the local agency)
35.	Expungements	Until case is finalized
<b>Environmental Health &amp; Safety</b>		
36.	Asbestos monitoring	30 years after the employee terminates
37.	Asbestos training	Retained for 1 year beyond the date of employment of the individual
38.	Evaluation drills, pest control logs	3 years
39.	Fire protection systems inspection and test records	3 years
40.	Portable fire extinguisher inspection reports	1 year
<b>Financial Aid</b>		
41.	Student financial aid files	7 years
42.	Student financial aid loan documents	3 years
<b>Human Resources</b>		
43.	Employee, faculty personnel files (including application, resume, appointment/salary forms), performance appraisals	6 years after termination
44.	Application from individuals not hired (staff)	3 years
45.	Application from individuals not hired (faculty)	3 years from hiring decision
46.	Personnel records of retired individuals (staff)	10 years after death
47.	Personnel records of retired individuals (faculty)	10 years after death
48.	Federal report requirements: welfare benefits and other fringe benefit plans (i.e. 5500-s)	Indefinite
49.	Individual contracts of employees (staff and faculty)	6 years after termination
50.	I-9 Forms, faculty, staff, students	3 years from date of hire or 1 year from termination, whichever is greater
51.	Search Committee records, including employment applications, resumes and all applicant search materials (for staff)	3 years
52.	Workers' compensation claims and insurance policies	18 years

53.	Employee eligibility for pension	6 years after death of eligible employee and beneficiary
54.	Employee personal information (name, SSN, period of employment)	6 years after death of eligible employee or beneficiary
55.	Plan administrator setting forth authority to pay records	Indefinite
56.	Pension plans and all attached amendments	Indefinite
57.	Pensions paid to employees or their beneficiaries	6 years after death of employee and beneficiary
58.	Copy of workers' compensation checks, insurance EOBs	7 years or until settled
59.	Corrective/Disciplinary action documents	5 years after termination
60.	Bureau of Labor statistics reports on employment, current job descriptions, donated leave records, inactive employee benefit file, reports on new hire, state retirement earnings cards	Indefinite
61.	HR-3 (for students), HR-6, HR-7, HR-18	4 years
<b>Institutional Research and Assessment</b>		
62.	IHL Board reports, University assessment reports, SACS documents, IPEDS reports, SREB documents	Indefinite
63.	HR-3 (for students), HR-6, HR-7, HR-18	4 years
<b>Insurance</b>		
64.	Insurance policies	Indefinite
65.	Insurance certificates	6 years after expiration of contract
66.	Reports (e.g. security) of accidents or incidents	4 years after report date
67.	Certificates of insurance issued by University	2 years (summary list – 4 years)
<b>Patents and Trademarks</b>		
68.	Invention disclosures and assignments	Indefinite
69.	Original patents, trademarks and related work papers	Indefinite
70.	Licensing agreements	6 years from expiration
71.	Royalty records	Life of patent or TM plus 6 years
<b>Payroll</b>		
72.	Annual payment records (employee transaction lists, payroll registers)	Indefinite
73.	Information returns filed with federal and state authorities (W-2, 941, 945. 1042s. etc.)	6 years
74.	Canceled checks	7 years
75.	Payroll deduction authorization forms; Wage assignments	6 years after employment ends
76.	Record of payments and deductions (deduction lists, adjustments)	6 years
77.	Time cards, students, employees	6 years
<b>Purchasing</b>		

78.	Purchase orders, purchasing contracts & agreements w/supporting documentation, such as: requisitions, justifications & bids, documentation for purchase orders, bids & contracts conducted by purchasing	7 years
79.	Automobile and truck tag applications	3 years
<b>Registrar (Student Records)</b>		
80.	Change of grade forms, class lists (original grade sheets), FERPA documents, schedule of classes	Indefinite
81.	Withdrawal authorizations	2 years after graduation or last enrollment
82.	Applications for graduation, class schedules	1 year after graduation or last enrollment
83.	Audit authorizations, changes of course (add/drop), grade reports, pass/fail requests, personal data information forms, transcript request, enrollment verifications	1 year
<b>Sponsored Projects, Contracts, and Grants</b>		
84.	Proposals for funded projects, IRB records, IACUC records, conflict-of-interest related records	3 years after completion of activity or resolution of the issue
85.	OMB A-133 Audit and Data Collection form	7 years
86.	Facilities & Administration cost rate calculations (billings & correspondence)	3 years
87.	Unfunded proposals	1 year after notice of no award
88.	Retired grants and contracts, original proposals, award and official correspondence	7 years after close-out of award
<b>Student Health Services</b>		
89.	Medical records (paper), medical records (electronic)	10 years
<b>Student Housing</b>		
90.	Charges and credits	7 years
91.	Individual records	4 years

## Disposal of Records

University records (regardless of the storage medium) can be disposed of upon reaching the minimum retention period stated in the policy, provided the department does not need the records for future administrative, legal, research/historical or fiscal purposes.

- A. Administrative value: contains information applicable to current or future University operations
- B. Legal value: contains evidence of legally enforceable rights or obligations of the University
- C. Research or historical value: documents the purpose, growth, history, service programs and/or character of the campus
- D. Fiscal value: required for budget development, financial reporting or audit purposes

The department head (or designee) is responsible for performing, at least annually, a review to determine the value or usefulness of departmental records. During this review, the department head (or designee)

should identify and designate for disposal (destruction or transfer to an archive) the records with elapsed retention periods (time maintained in office plus time in inactive records area) that are no longer useful.

Erase and verify elimination of data beyond recovery on electronic media (diskette, CD, and hard drive) before reusing or discarding. Recycle, if possible records that do not contain personal, confidential or financial information. The Physical plant can provide information regarding recycling. Otherwise, shred records and dispose of them. Erase electronic media components for recycling.

Unofficial records do not record University activities and include, but are not limited to:

- Routing slips
- Shorthand notes
- Telephone call slips
- Tapes of transcribed documents
- Stock supplies of publications
- Letters of transmittals that do not alter the transmitted information
- Extra copies of official documents kept for convenience or reference

### **Electronic Records Storage**

Electronic recordkeeping is the storage and retrieval of information in digital form. This means of recordkeeping includes, but is not limited to, the use of tapes, disks and optical disks. This applies to all electronic records systems.

Electronic or optical media, both fixed and removable, should have retention and disposition instructions incorporated into the system design. These media should be identified in a unique and standardized way, be maintained in a temperature-controlled and humidity controlled environment determined by the medium, and be handled appropriately if the medium requires special care (e.g., a smoke-free, low-humidity environment). Develop procedures to ensure timely backups of data. Consider rotating tapes for vital records. Consult vendors of backup media to find out the maximum number of times a given tape may be used for backup purposes. The retention period for these records is in accordance with the guidelines set forth in this policy.

### **Disposal of Paper Records After Transfer to Other Media**

Compact storage methods provide a space saving and often cost efficient means of storing records originally in paper form. Take extreme care when transferring information to a storage medium. Departments must ensure that records are legible and verified for accuracy before destroying paper copies. Retain the stored electronic records for the minimum retention period specified in this policy. Shred paper records containing sensitive and/or confidential information. Do not throw documents containing sensitive information in the trash that are not shredded!

### **Suspension of Record Destruction**

If the Department of Finance and Administrative Services communicates the need to suspend record destruction, destruction must be suspended immediately. Destruction or alteration of any record, in whatever form, which relates to any matter about which litigation or investigation is reasonably foreseeable, is prohibited by this policy and may result in termination, civil and/or criminal liability, or both.