



## Information and Records Management Policy

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### Background

Harvey Mudd College (the College), in response to the need to manage the College's recorded/stored information – in both paper and electronic formats, and as required under applicable state and federal laws and regulations – has developed the following policy statement regarding the creation, identification, retention, retrieval and ultimate disposition (destruction or preservation) of the College's records. The policy is designed to be a reasonable approach to the complexities of information management in the electronic age. The Policy may be revised by the Cabinet in response to changes in workforce or organizational structure, business practices, legal or regulatory requirements and technology. The procedures document and the records retention guidelines included in the appendix may be revised by the Business Affairs Office as circumstances warrant.

### POLICY STATEMENT

It is the policy of the College to create and retain only such information and records as are required to carry out its mission effectively and to meet its obligations to employees, faculty, students, public agencies and others. The College is committed to effective records retention to preserve its history, meet legal standards, optimize the use of space, and minimize the cost of record retention.

The College requires that different types of records be retained for specific periods of time and has designated official repositories and custodians for their maintenance. These records must be managed according to this policy statement and the attached Procedure Appendix and Records Retention Requirement Chart.

It is the further policy of the College to:

- Protect against accidental or premature destruction of records;
  - Retain all records for at least the minimum period required by applicable state and federal laws and regulations, or longer in the case of litigation or possible litigation;
  - Develop and maintain adequate records to document the College's compliance with all relevant laws;
  - Maintain availability of records that may affect the obligations of the College;
  - Guard against breaches of corporate, student, faculty, or employee security and privacy;
  - Dispose of duplicate, unnecessary or obsolete records in accordance with the attached guidelines in a systematic manner.
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**ENTITIES AFFECTED BY THIS POLICY**

- All departments of the College

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**RELATED DOCUMENTS**

- Procedures Appendix
- Records Retention Requirement Chart

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**COLLEGE RECORD DEFINITION**

A College Record is the original version or official copy of a document that is generated or used by an administrative and/or academic department for the purpose of conducting college business. If a document or record is listed in this Policy, the original or official copy must be retained pursuant to this Policy.

Duplicate or multiple copies of College Records should not be retained once they are no longer actively needed by the possessor. If you are not sure whether a document or record you possess is a College Record, you must check with your department's administrative manager or a designee before ceasing to retain the document.

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**RECORD RETENTION REQUIREMENT CHART**

The College's record retention requirements follow in table format. The table is not intended to be an all-inclusive listing but rather a guide for the more frequent or commonly used records that need to be retained. If your records are not contained in the table, please consult the Business Affairs Office for guidance prior to discarding them. Further, please keep in mind that the retention periods in the table may increase by operation of law, contract, litigation, claims, or audit requirement. If the retention periods seem inconsistent for a particular type of record, then the longer period should be followed.

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**CONTACTS**

Direct any questions about this policy to your department's supervisor. Questions about specific issues may be addressed to:

<b>Subject</b>	<b>Contact</b>	<b>Telephone</b>
Policy Clarification or Exceptions	Business Affairs Office	Ext 72889
Destruction/Shredding of Records	Facilities and Maintenance Custodial Services Manager	Ext 72399

## RECORDS RETENTION REQUIREMENT CHART

Type of Record	Retention Schedule in Years	Responsible Department
<b>CORPORATE RECORDS</b>		
Articles of Incorporation	Permanent	Business Affairs Office
Bylaws	Permanent	Secretary of the College
Minutes of the Board of Trustees and its committees	Permanent	Secretary of the College
Contracts (construction)	Life of Building or 13 after end of term, whichever is longer	Facilities and Maintenance Department
Other contracts	4 if entered into and to be performed in California	Business Affairs Office
Leases	4 after end of lease term	Business Affairs Office
License information/permits/certificate of need	While licenses are active and 3 thereafter	Business Affairs Office
Tax exemption documents, IRS form 1023; determination letters; and related state and federal documents	Permanent	Business Affairs Office
Copyrights, trademarks, service marks, and patents	Permanent	Business Affairs Office (stored at CUC Financial Services)
Letters pertaining to patents, copyrights, licensing agreements, bills of sale, permits, contracts and agreements	For the life of the principal document to which it relates	Business Affairs Office
<b>CORRESPONDENCE</b>		
Unimportant letters and notes which require no acknowledgement or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings	Do not retain	All Departments
Form letters which require no follow-up	Do not retain	All Departments
Other letters of inconsequential subject matter or which definitely close correspondence to which no further reference will be necessary	Within 30 days (including related correspondence)	All Departments
Copies of interdepartmental or other Harvey Mudd correspondence where another copy of the same letter will be in a file	Do not retain	All Departments
Letters of general inquiry and replies which complete a cycle of correspondence and have no value unless reference from the correspondent is likely to ensue	1	All Departments

<b>Type of Record</b>	<b>Retention Schedule in Years</b>	<b>Responsible Department</b>
Letters requesting specific action such as name or address change, complaints which have no further value after changes are made or action taken	1 (if in doubt, consult legal counsel)	All Departments
Memoranda and reports about expense accounts which have limited value after the expenses are approved and documented elsewhere	Do not retain	All Departments
Letters explaining but not establishing Harvey Mudd policy	Retain Until Policy Obsolete or Superseded	All Departments
Collection letters which have limited value after the account is paid	4 after payment	All Departments
Quotation letters from vendors where no contract results	1	All Departments
<b>EDUCATIONAL RECORDS</b>		
Accreditation and licensure records	Permanent	Office of the Dean of Faculty
Curriculum information	Until obsolete or 1, whichever is longer	Office of the Dean of Faculty
Faculty and student handbooks	Permanent	Office of the Dean of Faculty
Admissions records (non-attending)	3 after decision	Office of Admission
Student academic records (grades, transcripts, transfer credit, grade changes, etc.)	Permanent	Office of the Registrar
Student athletics	Permanent	Office of the Registrar
Student housing & residence halls	5	Office of the Dean of Students
Student transcript requests	1 from date of request	Office of the Registrar
Student discipline	General – 5 years after graduation Suspension/Expulsion - Permanent	Office of the Dean of Students
Student health records	Per CUC Record Retention Policy	CUC Student Health Services
Foreign student forms	5 after graduation or date of last attendance	International Place
Tuition and fee charges	4	Business Affairs Office

Type of Record	Retention Schedule in Years	Responsible Department
Student account files (1098T, financial registration card, tuition payment agreement, student account receivables, etc.)	4 after graduation or date of last attendance	Office of Student Accounts
Alumni records	Permanent	Office of Development
Reports to the Department of Education (DOE)		
Financial Aid records		
Original promissory note	Per CUC Record Retention Policy	CUC Financial Services
Loan amount, terms, repayment and history	Per CUC Record Retention Policy	CUC Financial Services
Fiscal operations reports	3 from the end of the award year in which the report was submitted	Office of Financial Aid
Borrower eligibility and participation; work study; records to ensure that funds received for repayment are properly administered; records regarding required disclosures to students regarding financial aid; records necessary to determine institution eligibility, financial responsibility and administrative capability; financial records sufficient to allow the DOE to conduct an annual audit.	5 after student ceases to attend	Office of Financial Aid
<b>FACILITIES/EQUIPMENT RECORDS</b>		
Equipment depreciation records	Per CUC Record Retention Policy	CUC Financial Services
Fire protection and emergency powers equipment testing	4	Facilities and Maintenance Department
Elevator standards	Per CUC Record Retention Policy	CUC Central Facilities Services
Facilities operational manuals	Life of Building	Facilities and Maintenance Department
Records of fire and other emergency drills	6	Facilities and Maintenance Department
Records of inspections	2	Facilities and Maintenance Department
Emergency plans	1	Facilities and Maintenance

<b>Type of Record</b>	<b>Retention Schedule in Years</b>	<b>Responsible Department</b>
Records of hazardous wastes	Per CUC Record Retention Policy	CUC Central Facilities Services
Inventory of hazardous wastes	30	Facilities and Maintenance Department
Records of radioactive materials	30	Physics Department
Records of P-32 unsealed radioactive sources for the Chemistry Department	Permanent	Chemistry Department
Records of radiation safety for the Physics Department	Permanent	Physics Department
Security video tapes	2	Facilities and Maintenance Department
<b>FINANCE – ADMINISTRATION RECORDS</b>		
Audited financial statements	Permanent	Business Affairs Office
W-2's, 1099's, 990's payroll, and other tax returns with supporting documentation	Per CUC Record Retention Policy	CUC Financial Services
<b>FINANCE – ACCOUNTING RECORDS</b>		
<b>Cash receipts:</b>		
Cash receipt interface	Per CUC Record Retention Policy	CUC Financial Services
Deposit slips	Per CUC Record Retention Policy	CUC Financial Services
Remittance deposit backup	Per CUC Record Retention Policy	CUC Financial Services
<b>Cash disbursements:</b>		
Cancelled checks / Cancelled checks supporting capital asset basis	Per CUC Record Retention Policy	CUC Financial Services
Voucher packages (A/P)	Per CUC Record Retention Policy	CUC Financial Services
Vendor histories	Per CUC Record Retention Policy	CUC Financial Services
Deductions/earnings registers	Per CUC Record Retention Policy	CUC Financial Services

Type of Record	Retention Schedule in Years	Responsible Department
Accounts payable distribution	Per CUC Record Retention Policy	CUC Financial Services
Labor distributions	Per CUC Record Retention Policy	CUC Financial Services
<b>FINANCE-GENERAL RECORDS</b>		
Accounting analyses	10	Business Affairs Office
Administrative statistical reports	10	Business Affairs Office
Auditors' reports, opinions, disclaimers and management reports	7	Business Affairs Office
Bank reconciliations	Per CUC Record Retention Policy	CUC Financial Services
Bank statements	Per CUC Record Retention Policy	CUC Financial Services
Budget documents	4	Business Affairs Office
Business records including yearly total sales volume and total goods purchased	4	Business Affairs Office
Cancelled checks	Per CUC Record Retention Policy	CUC Financial Services
Check Registers	Per CUC Record Retention Policy	CUC Financial Services
Copies of source documents supporting purchases	Until disposal of equipment +4	Individual Departments
Copies of accounting transactions (RFC and journal vouchers)	2	Individual Departments
Cost reports and work papers	10	Business Affairs Office
Departmental correspondence	See section on Correspondence	All Departments
EEO6, IPED or other affirmative action reports	5	Office of Human Resources
Fixed asset records monthly reports	Per CUC Record Retention Policy	CUC Financial Services
Fixed asset records year end reports	Per CUC Record Retention Policy	CUC Financial Services
General ledgers	Per CUC Record Retention Policy	CUC Financial Services

<b>Type of Record</b>	<b>Retention Schedule in Years</b>	<b>Responsible Department</b>
Insurance policies and related claims, reports and investigations	Per CUC Record Retention Policy	CUC Risk Management
Journal vouchers with support	Per CUC Record Retention Policy	CUC Financial Services
Purchase or improvement of fixed assets	Period of time asset held +6	Facilities and Maintenance Department
Rideshare files (AVR output reports, planning forms, weekly employee surveys, etc.)	3 from program approval date	Office of Human Resources
<b>FINANCE – GIFT GIVING RECORDS</b>		
Advancement, endowment and gift records	Permanent	Office of Advancement
<b>LEGAL FILES RECORDS</b>		
Legal files/affidavits	Consult legal counsel	Business Affairs Office
Drafts of documents superseded by final versions	Do not retain	Business Affairs Office
Letters denying liability of Harvey Mudd or which Harvey Mudd might need to produce in court to disprove liability or to enforce Harvey Mudd's rights	Consult legal counsel	Business Affairs Office
<b>LIBRARY RECORDS</b>		
All records related to purchases or acquisitions	Per CUC Record Retention Policy	CUC Libraries of the Claremont Colleges
Borrower/lender records	Per CUC Record Retention Policy	CUC Libraries of the Claremont Colleges
Library applications/cards	Per CUC Record Retention Policy	CUC Libraries of the Claremont Colleges
<b>PERSONNEL DATA RECORDS</b>		
All payroll records	Per CUC Record Retention Policy	CUC Financial Services
Chemical safety, toxic exposure, and other OSHA records	30	Facilities and Maintenance Department
Logs of occupational injuries and illnesses (OSHA form 300A)	5 from the end of the year to which they refer	Office of Human Resources
Fire extinguisher training	1	Facilities and Maintenance Department

<b>Type of Record</b>	<b>Retention Schedule in Years</b>	<b>Responsible Department</b>
Illness injury prevention program	1	Facilities and Maintenance Department
Child labor certificates and notices	3	Office of Human Resources
Employee handbooks	Permanent	Office of Human Resources
Employee health/medical records	6 after employment termination	Office of Human Resources
Employee settlement agreements	6 after end of term	Office of Human Resources
Employee personnel files	6 after employment termination	Office of Human Resources
Employee personnel records	6 after employment termination	Office of Human Resources
Employee wage records	4 looking backwards	Office of Human Resources
Employment eligibility verification forms (I-9 Forms)	3 after termination	Office of Human Resources
Faculty promotion and tenure, tenure review, records of paid leaves and stipends	Permanent	Office of Human Resources
First aid records of job injuries causing loss of work time	10	Office of Human Resources
Help wanted ads, job opening notices	3	Office of Human Resources
Individual employee contracts; any contract or agreement relating to employee terms of employment.	6 after employment term (including post-contract) expires	Office of Human Resources
Job applications, including letters and background checks, for those not hired	2	Office of Human Resources
Job inquiries sent to employer	2	Office of Human Resources
Notices of opportunities for training	3	Office of Human Resources

<b>Type of Record</b>	<b>Retention Schedule in Years</b>	<b>Responsible Department</b>
Pension and welfare plan information	Permanent or 6 following plan termination and distribution	Office of Human Resources
Personnel files of litigated cases or potential litigation	Consult legal counsel	Office of Human Resources
Records relevant to discrimination charge or complaint	Consult legal counsel	Office of Human Resources
Safety training records	6 years after termination	Office of Human Resources
Timecards	6	Office of Human Resources
Worker's compensation files	15	Office of Human Resources
<b>PUBLIC RELATIONS RECORDS</b>		
Clippings (historical)	Permanent	Office of Advancement
Permissions to release information and photos	Permanent	Office of Advancement
Photographs (historical)	Permanent	Office of Advancement
Press releases	3	Office of Advancement
In-house publications	Permanent	Office of Advancement

**NOTES:** In proposing holding periods we have observed the following priorities: Statutorily mandated holding period, or if none then applicable statute of limitations, or if none then by best practices. In many cases, a holding period means the indicated number of years following the end of the fiscal year in which the counting period would begin. Thus, if a contract holding period would be four years following expiration of its term, and its term expired June 30, 2007, the holding period would end July 1, 2011. This provides a sufficient margin to avoid intra-year computational error. For other types of records, the holding period may be based on another period as indicated.

# HARVEY MUDD

## COLLEGE

### Information and Records Management Policy Procedure Appendix

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#### **DEFINITIONS**

These definitions apply to these terms as they are used in this document:

#### **Active Record**

A College Record with current administrative use for the department that generated and/or is using it. College Records remain active for varying numbers of years, depending on the purpose for which they were created and/or used. Such records are maintained by the department which generated and/or is using them for as long as they remain active.

#### **Inactive Record**

A College Record without current administrative use for the department that generated it, but which does not qualify as an Archival Record. Such records are maintained by the designated Official Repository pursuant to this Policy.

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#### **RESPONSIBILITIES FOR MANAGING INACTIVE RECORDS**

Each office's administrative manager or a designee should:

- Implement the office's record management practices;
- Ensure that these management practices are consistent with the Information and Records Management Policy;
- Educate staff within the office in understanding sound record management practices;
- Arrange for the routine disposal of documents that do not require retention, including those stored on computer hard drives and file servers;
- Transfer Inactive Records to the applicable Responsible Department for retention in compliance with this Policy; and
- Recognize that in many instances, the department that generated or is using the College Record may itself be the Responsible Department for that record.

If you have any questions about your responsibilities, contact the Business Affairs Office and someone will work closely with you to ensure understanding of this policy and implementation of these responsibilities.

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## **DESTROYING INACTIVE RECORDS**

If it has been determined that it is appropriate to cease retaining Inactive Records, treat them in one of the following ways:

1. Recycle non-confidential paper records.
2. Shred or otherwise render unreadable confidential records.
  - o For large amounts of shredding
    - i. Place a Facilities and Maintenance work order
    - ii. Or contact the custodial services manager (ext 72399)
3. Erase or destroy electronically stored data.
  - o Periodically review records generated and maintained in College information systems or equipment (including mainframe, mini, and micro computing/storage systems) to ensure that these requirements are met.

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## **EFFECT OF “LITIGATION HOLD” MEMORANDA**

The College may issue subject-matter specific memoranda (Litigation Holds) detailing additional and/or different retention requirements due to pending or threatened litigation, pending or threatened audits, and/or similar events. Such Litigation Holds must be strictly followed, and their provisions supersede any contrary provisions of the Information and Records Management Policy.