



Title: Records Management	Policy No.: ADM 1.05	Date: 1/28/11 Rev.: 11/28/11; 8/1/13, 8/1/15
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Areas Affected: All BSMCON Administration, Faculty and Staff Page 1 of 8

PURPOSE AND SCOPE

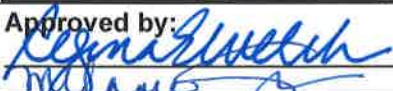

The purpose of this policy is to ensure the integrity, confidentiality, and security of all documents and records created, received or maintained in the course of institutional business, protect the interests of faculty, employees, students of the Bon Secours Memorial College of Nursing ("the College"), facilitate appropriate access to such documents, and records, and inform all faculty, employees and administrators of the College of the standards, requirements, and responsibilities for the management, retention and disposition of all records of the College.

RECORDS DEFINED

The term "record" under this policy means all documents and records, whether written, electronic or recorded matter regardless of its physical form or characteristics, that are created, produced, received or maintained by faculty, employees or components of the College during their activities for or on behalf of the College or in the transaction of College business. Records may also include documents that were acquired by the College as the result of a business acquisition or by written agreement to serve as custodian. Examples include, but are not limited to, academic files, administrative files, student files, financial and accounting records, correspondence, letters, memoranda, forms, charts, reports, maps and drawings, plans, photographs and films, spreadsheets, computer records, microfilm and microfiche, electronic files, electronic mail, data processing output in media, video and audio recordings, and micrographics or any digitization magnetic tape or other electronic storage of any of these things. This policy does not apply to non-records which include preliminary drafts not circulated for comment, duplicate copies of correspondence, duplicate copies of records used for short-term reference purposes, blank forms, stocks of publications, magazines, publications from professional organizations, newspapers, public telephone directories, electronic mail ("e-mail) created during incidental use and transitory messages such as voice mail, telephone messages, self-sticking notes and other messages which are used primarily for the informal communication of information.

Active records are defined as information that is regularly accessed while students are enrolled. Inactive records are those which are rarely accessed and, if not electronic, may be stored at a secured off-site storage. Records custodians should retain detailed storage information of documents stored offsite in order to retrieve them on demand or at the end of the retention period, at which time the custodian is responsible for disposal of those specific records.

Reference Policy # _____

Approved by:  Signature	Dean of Finance and Administration Provost/VP Title	 8.1.15 Date
Approval History: Committees and Dates: AD Administration – 11/10/11 Policy Committee 11/28/11; 10/19/12, 8/1/15		
Key words: <u>Records</u>		

POLICY

It is the policy of the College that all records (as defined above) are the property of the College and neither the personal property nor the property of a specific school, department, division, unit, institute or center, that such records are maintained in accordance with all applicable laws and regulations, the requirements of accrediting and other external agencies, and the standards and procedure prescribed herein, and that records that are no longer needed or of no value are discarded or disposed of as specified in this policy.

RESPONSIBILITIES

All College personnel are responsible for ensuring that all records are created, used, maintained, preserved, and disposed of in accordance with this policy. Electronic records are to be managed consistent with the requirements for traditional records in compliance with this policy. Records containing confidential and proprietary information shall be securely maintained, controlled, and protected to prevent unauthorized access. The unauthorized use, removal, or destruction of College records is prohibited. No College record or document may be falsified or inappropriately altered in any manner. Information pertaining to the unauthorized use, removal, or destruction of the College's records or regarding falsifying or inappropriately altering information in a College record should be reported directly to the Provost of the College.

All College records shall be retained in a readable format regardless of changes in technology or equipment obsolescence. Printing documents and saving to a file, maintaining old equipment and software applications, or converting records to new technology, may meet this requirement. Electronic mail ("e-mail"), i.e., is subject to this policy. E-mail senders (originators) are responsible for retaining messages and documents relating to the transaction of College business in compliance with the attached Records Management Schedule. E-mails may be retained in electronic form or printed.

Each functional area of the College shall have a designated records custodian responsible for implementing records management practices consistent with this policy, establishing and monitoring the level of confidentiality and security appropriate for specific types of records, educating staff in understanding records management practices, preserving records of legal, fiscal, or administrative value, and destroying inactive records upon expiration of the application retention period. Custodians are responsible for reviewing Records Management Schedule annually and informing the College's administration of any necessary changes.

In the event of College closure or revocation of certification in Virginia, the College will contract with another institution or records management company to arrange for preservation and access to its academic records to the public based on defined criteria. The College will also notify the State Council of Higher Education in Virginia of its preservation plans in a timely manner.

RECORDS MANAGEMENT SCHEDULE

The Records Management Schedule (Appendix) lists the College's significant academic and business records and their corresponding minimum retention period. The Schedule applies to all College documents effective August 2010, signature dates may vary. In most cases, state or federal law determines the period that specific records must be maintained, regardless of their active or inactive status. Where there are no legal requirements, the College will apply professional standards dictating best practices for records management.

RECORD DISPOSAL

Records that have satisfied their legal, fiscal, administrative, and archival requirements are to be disposed of or destroyed in accordance with the Records Management Schedule (see Appendix). Records must be destroyed in a manner that ensures the confidentiality of the records and renders the information no longer readable and recognizable as College records prior to disposal. The approved methods to dispose records include, but are not limited to, recycling, shredding, burning, pulping, pulverizing, and magnetizing. Written documentation of such disposal shall be kept and maintained by the designated records custodian. Deletion of confidential or privacy-protected information in computer files or other electronic storage media is not acceptable. Electronic records must be "wiped" clean or the storage media physically destroyed by or under the direction of Bon Secours Information Services (or by its designee). These methods of destruction are specified so that records may not be viewed or used by unauthorized persons after they are disposed.

LITIGATION HOLDS

Where the College has information regarding current, pending, threatened litigation or governmental investigation, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In such event, the College is under legal obligation to preserve all relevant records pertaining to the issues and will take steps to identify all paper and digitally maintained files (including e-mail and computer accounts of separated employees) that may contain information relevant to the case. The College's Provost will notify appropriate personnel to preserve such documents indefinitely until receiving a written release by the Provost. In the event of a litigation hold, all policies for the disposition of documents must be suspended for the subject of the hold. Failure to preserve documents after having received a preservation notice can have extremely serious consequences for the College. This hold includes the preservation of electronic media and obligates the College to copy and preserve emails and computer hard-drives of involved personnel for future forensic investigation. Accordingly, failure to comply with a litigation hold will be deemed misconduct and will subject personnel 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.

APPENDIX – RECORDS MANAGEMENT SCHEDULE

Custodians are identified for each area, with exceptions noted.

Area	Custodian	Record	Retention Period	
Publications, Statistical Data, and Institutional Reports	Varies			
	Provost	Accreditation, institutional	Permanent	
	Academic Dean	Accreditation, program	Permanent	
	Registrar	Catalogs	Permanent	
		Commencement programs	Permanent	
		Class schedules	Permanent	
	Dean - Finance & Administration	Crime Statistics/Security Reports	3 years	
		Tuition and fees	3 years	
	Director of Institutional Effectiveness	Degree statistics	Permanent	
		Enrollment statistics	Permanent	
		Grade Statistics	Permanent	
		Demographic Data	Permanent	
		Graduation Rates	3 years	
	Admissions	Director - Admissions		
		For applicants who do not enroll:		
		Entrance Exam Scores	1 year after application	
		Correspondence	1 year after application	
		Online Applications	1 year after application	
		Transcripts (high school)	1 year after application	
		Transcripts (post-secondary)	1 year after application	
	Records of applicants who enroll become the foundation of their student records.			

Area	Custodian	Record	Retention Period
Student Services	Dean – Student Services		
	Registrar	Academic Warnings	5 years after graduation or resignation
	Registrar	Academic Suspension	5 years after graduation or resignation
	Registrar	Academic Dismissal	Permanent
	Dean - Student Services	Academic Honor Code Violations	1 year after graduation or resignation
	Registrar	Correspondence (related to academic records, inquiries)	1 year
	Dean - Student Services	Disciplinary Action Records	5 years after graduation or resignation
		Grievance/Complaint	3 years after closure
	Registrar	Leave of Absence	2 years
	Registrar	Enrollment Verifications	1 year after verification
Curriculum	Academic Dean		
		Course Syllabi	Permanent
		Course Clinical Evaluations	1 year after course completion
		Clinical Schedules	1 year after course completion
		Course Calendar	1 year after course completion
		Textbook Information	3 years
Student Academic Reports			
	Course faculty	Exams/graded coursework	1 year after course completion
	College IS	Gradebook	1 year after course completion
	Academic Dean/course faculty	Grade appeals/complaint	1 year from disposition

Area	Custodian	Record	Retention Period
	Academic Dean	Instructor evaluations (by student)	1 year
	Faculty	Academic Advising Records	2 years after graduation or resignation
Student Records	Registrar	Degree Audit Records	5 years after graduation or resignation
		Course Rosters	Permanent
		Student requests for formal hearings to amend education records	Permanent until terminated by student
		Decisions from formal hearings regarding amendment of education records	Permanent
		Enrollment Changes (Add/Drops)	1 year after date submitted
		Grade Change Forms	5 years after graduation or resignation
		Graduation Lists	Permanent
		Holds on Registration, Transcripts	1 year after released
		Name change authorizations	5 years after graduation or resignation
		Substitutions/Waivers	5 years after graduation or resignation
		Requests to change personal data	1 year after graduation or resignation
		Student request for and disclosures of personally identifiable information (FERPA compliance)	Permanent until terminated by student
		Student authorization for disclosure of education records	Permanent until terminated by student
		Student Semester Class Schedules	1 year after graduation or

Area	Custodian	Record	Retention Period
		Transcript Requests by Student	resignation 1 year
		Transfer credit evaluations	5 years after graduation or resignation
		Withdrawal/cancellation of enrollment records	5 years after graduation or resignation
Student Accounts	Sr. Staff Accountant – Fiscal Services	Pell grant statements of account	3 years
		Federal aid reconciliation reports	3 years
		Audit reports and institution responses	3 years
		Bank statements for all accounts containing federal aid funds	3 years
		Student account records	3 years
		General ledger and subsidiary ledger accounts containing federal aid	3 years
		Federal work-study payroll records	3 years
Financial Aid	Director -Financial Aid		
<u>Program Records</u>	Audit and review reports and institution responses		3 years from award year end
	Other records pertaining to financial responsibility and standards of administrative capability		3 years from award year end
	Program Participation Agreement		3 years from award year end
	State agency reports relating to financial aid		3 years from award year end
	Data used to establish student's admission, enrollment status, period of enrollment		3 years from award year end
<u>Recipient Records</u>	Date and amount of disbursements		3 years from award year end
	Documentation of initial or exit loan counseling		3 years from award year end
	Documentation of student eligibility		3 years from award year end
	Documentation of student's program of		3 years from award year end

study and enrolled courses	
Documentation of student's satisfactory academic progress	3 years from award year end
Documentation related to the receipt of aid, such as amount of grant, loan, federal work study award, and calculations used to determine aid amounts	3 years from award year end
Documentation used to verify selected financial aid applicant data	3 years from award year end
Financial aid history for transfer students	3 years from award year end
Reports and forms used for participation in student financial aid program	3 years from award year end
Student aid report (SAR) or Institutional Student Information Record (ISIR)	3 years from award year end
<u>Requirements for Specific Aid</u>	
Borrowers eligibility records	3 years from award year end
Campus-based aid (Perkins loan, SEOG, and federal work study)	3 years from award year end
FFEL and Direct Loans	3 years from award year end
Fiscal operations report (FISAP)	3 years from award year end
Pell Grant	3 years from award year end
Perkins original promissory notes	Until loan is satisfied or documents are needed to enforce obligation
Perkins repayment records	3 years from date loan assigned, cancelled, or repaid

American Association of Collegiate Registrars and Admissions Officers (2010). AACRAO's Retention of Records: Guide for Retention and Disposal of Student Records. Washington, DC: AACRAO.

U. S. Department of Education (2011). Record Keeping Electronic Processes & Privacy: Federal Student Aid Student Financial Aid Handbook. Washington, DC: U.S. Department of Education.