

Records Retention

General Description

Policy Summary:

This policy provides for the systematic review, retention, and disposition of documents and records received, created, or maintained by the University in connection with University business. The policy contains a schedule for how long certain documents should be retained and how they should be disposed of (unless they are under a legal or other similar investigation, or are otherwise subject to a litigation hold). This policy is designed

- To preserve the history of Trinity University,
- to ensure adequate documentation in the event of litigation or an administrative agency charge,
- to comply with federal and state laws and regulations,
- to eliminate accidental or innocent destruction of records required to be retained, and
- to facilitate the University's operations by promoting efficiency and freeing-up valuable storage space.

Scope:

This policy applies to all employees who manage University Records. This policy also applies to all outside vendors or volunteers whose work, or services for the University, requires the management of University Records.

Exceptions:

None.

Policy Content

Records or Documents

Records are information fixed in any media and include, but are not limited, to the following formats: paper and electronic documents, audio and video recordings, databases, emails text messages and/or instant messages (collectively the “Records”).

Unofficial Records

Unofficial Records are not subject to this policy. Unofficial records are:

- Private or personal documents that are not created or received in the course of the University's business;
- Extra Copies of Official Records. For example, for each official policy, there will be copies of this policy distributed to employees. Any copies are not Official Records.

- Faculty records created or received solely in the course of faculty research or professional activities, such as interview or survey results, databases, or manuscripts materials are not Official Records. **Note that Records created or received by faculty in the course of teaching, advising, committee work, research administration or program, department or institution administration are Official Records under this policy.**

Official Records

Official Records are Records that are created or received in the ordinary course of the University's business. Official Records are the property of the University and must be maintained, preserved or destroyed in accordance with this policy. Official Records, include, but are not limited to: correspondence (including e-mails); minutes; memos; drawings; maps; computer data; machine readable data; reports; newsletters; published materials; institutional policies and procedures; financial records, including invoices, journals, ledgers, purchase orders, grant documentation or other records pertaining to fiscal information; personnel records, including evaluations and other communications regarding an employee's performance.

Personally Identifiable Information

Personally Identifiable Information is defined as data or information that includes either the name of an individual or other family members, the individual's address, a personal identifier such as a social security number or identification number, or a list of personal characteristics, or other information that would make an individual's identity easily traceable.

Confidential Information

Confidential Information should be protected as required by law and policy. Confidential information includes information that is protected as confidential by law, such as the Family Educational Rights and Privacy Act of 1974 (FERPA) (education records), or the Health Insurance Portability and Accountability Act's Privacy Regulations (HIPAA) (medical records) as well as any other information that Trinity, as a private university, deems confidential and takes steps to protect as such. While the following is not intended as an all-inclusive list, Confidential Information also includes the following categories:

- Any student, faculty or staff information made confidential or private by statute or regulation such as FERPA, HIPAA, the American With Disabilities Act or the Family Medical Leave Act;
- Personnel information;
- Purchasing records prior to the opening of bids, or prior to the award of contracts resulting from requests for proposals;
- Trade Secret Proprietary information;

- Financial and contract information; and
- Information Trinity has contractually agreed not to disclose.

Record and Document Retention

The University will retain Records in accordance with the University Record Retention Schedule. Records not listed in the schedule that are substantially similar to those listed in the schedule, or that pertain to a particular transaction or matter documented by a Record listed in the schedule, should be retained for the length of time required for the substantially similar/related Record.

Record and Document Retention Schedule

The Record retention schedule is a control document that describes the Records of the University by subject matter category, establishes a timetable for the maintenance, archiving or destruction of the Records, prescribes an ultimate disposition for the Records, and serves as the authorization for the disposition of Records.

Electronic Records and Documents

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files that fall into one of the document types on the schedule, or that represent a substantially similar/related document as discussed above, will be maintained for the scheduled length of time. E-mail messages and/or other electronic files that need to be retained under this policy should be either (i) printed in hard copy and stored in the appropriate file or (ii) downloaded to a computer file and stored electronically or on a disk as a separate file.

Disaster Planning and Preparedness

Trinity University records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the University operating in an emergency, are duplicated and backed-up on a regular schedule.

Record and Document Disposition

Departments are responsible for the safe and secure maintenance, storage, and disposition of their own records, with oversight by each vice president or his or her designee. The Office of Finance &

Administration will serve as a resource for the ongoing process of identifying records that meet the required retention period. Once Records have been identified as having met the retention period, the following hardcopy Records will be destroyed by shredding: 1) University financial records; 2) individually-identifiable financial, medical, student, or personnel-related records; and 3) any other documents or records containing Confidential Information, as defined above, and/or non-public information about the University. If in doubt as to the proper method to destroy a document, shred it.

Litigation Hold

Document disposition will be suspended immediately and all potentially relevant records and documents, whether listed on the Retention Schedule or not, must be preserved and maintained when legal action is reasonably anticipated, and/or when an administrative proceeding or lawsuit is filed. Records and documents that are subject to a "litigation hold," as determined by the Office of Finance & Administration, shall be preserved and retained until such time as the Office of Finance & Administration specifically authorizes the hold to be released. Records that are subject to a litigation hold shall not be destroyed in accordance with Trinity's standard destruction procedures.

As such, upon initiation of a litigation hold, these Records must be immediately segregated from other records so they are protected from any routine Record purges. This is especially critical for emails or other electronic documents that may be subject to a computerized purge cycle. Please contact the Office of Finance and Administration if you have any questions about this procedure.

Performance Evaluation

Consequences of Policy Violation:

All employees and others who are subject to this policy may be subject to sanctions for violations of this policy up to and including termination of employment, cancellation of contract or removal from the University. Failure to comply with this policy can also result in possible civil and criminal sanctions against the employee violating the policy and/or the University.

Related Documents

Related Content:

[View Record and Document Retention Schedule](#)

Revision Management

Revision History Log:

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Vice President Approval:

Enter Vice President(s) that are responsible for approving this document

Name:	Title:
Gary Logan	Vice President for Finance & Administration