Cloud County Community College
Records Management

Update May 2012
As you read these procedures, any word surrounded by quotations is defined in the procedure and should be read with this definition in mind. Definitions will be shown in bold italics.
1. Introduction and Procedure Statement

Cloud County Community College's procedure on records management and retention is the result of the work of a committee to develop a comprehensive approach for managing and preserving College records. These procedures apply to all records of the College and its related entities and are managed by the Director of the Library. These procedures outline responsibilities related to records management, preservation, retention and disposal.

Procedure Statement: Cloud County Community College retains and preserves vital records of its business and operations to preserve an historical record of the College, to ensure current and future operations, and to comply with its legal obligations. The College will retain such records for a length of time that is appropriate to their nature and as is required by law.

2. Cloud County Community College Archives

Currently, the College's Library oversees the disposition of official records, an authority given to it in 2008. Cloud County Community College's Library acts as a central entity for the storage of records that have long-term value as well as those records deemed of permanent and therefore archival value to the College. The College Library receives records for permanent storage.

3. Definition of a Record
A 'record' is anything containing information reflecting College educational and business transactions regardless of format (paper, digital, photographic, etc.).

Typical records include official publications, fiscal data, incoming/outgoing correspondence including email, minutes of meetings, reports, and student files.

Not all records must be retained. The list below describes items in a typical office that are not classified as records and therefore do not need to be categorized or maintained. These materials may be destroyed at any time if they are no longer needed by the office holding them. These items will not appear on a 'retention schedule.'

- large quantities of duplicate materials and all duplicates of 'official copies'
- non-Cloud County Community college published magazines and newspapers
- published reports produced by other entities
- purchased data from other sources
- blank letterhead or other blank forms
- routing slips or telephone messages
- catalogues, journals, or other printed matter used for informational purposes
- routine letters of transmittal and "for your information" notes
- notices or memoranda that give only 'timely information' such as a change of venue for a meeting
- notes or working papers once a project is completed, unless they provide more complete information than the final report

'Permanent' records, also called 'archival records,' are 'records' which have historical, administrative or research value to the College and which we intend to keep indefinitely.

Remember that a lot of material is not a 'record' at all and can be destroyed at any time. Once something is defined as a record it is either 'active' or 'inactive.' All 'active' or 'inactive' records will be listed on a 'retention schedule.' 'Active' records are records that you generally refer to once a month. 'Inactive' records are records that you have not needed for at least one year. Unless these records have been defined as 'permanent' records they should be destroyed according to the time period shown on the 'retention schedule.' 'Inactive' records should be securely stored until the end of the 'retention period.' At the end of the 'retention period' the custodian of the records is responsible for the physical work of destroying the records.
4. Retention Schedules

A ‘retention schedule’ is a table describing categories of records, providing a length of time they should be kept and includes instructions for disposition. State or federal law may determine the period that certain records must be kept. The periods of time discussed in these procedures are set to comply with federal and state law requirements. Certain documents are vital to the reconstruction of College business in the event of a catastrophe. The College’s Crisis Management Plan addresses many of the concerns related to how records are stored and maintained both during the period in which they are ‘active’ or ‘inactive.’ These files will be identified in the records retention schedules and should become a permanent part of the College Archives.

The General Retention Schedule at the end of these procedures list the most common records at the College and provides a retention period along with any special instructions related to disposal. Almost every department or office will have records requiring retention that are NOT on the General Retention Schedule. Records that are not on this schedule should be added on a case by case basis in consultation with the Director of the Library.

The retention period is a minimum period of time for keeping records. Custodians may hold records longer than the retention period. However, the College does not have space for storage beyond the retention period and each custodian is responsible for ensuring storage is secure and under conditions that will preserve the record.

Certain offices within the College may find there are professional standards dictating best practices for records retention. For example the Registrar’s Office will adhere to the Family Educational Rights and Privacy Act in determining access to records and the format for keeping records. Student Financial Services will be bound by federal laws related to student financial aid. The General Retention Schedule incorporates the requirements of various laws as they apply to general categories of records.

5. Records Custodians

Everyone who creates records is responsible for managing those records while they are using them. Maintaining records in a safe, secure, and retrievable way is the primary responsibility of the creator while the record is serving its useful purpose. Sometimes the creator of the record will also be the official custodian.

All records of the College have an official ‘custodian.’

Custodians are expected to:
* understand the records created within the department or office
* follow this policy to make decisions on retention and disposition of records and provide guidance to others who are involved in preparing records for storage;
* be responsible for ensuring everyone in the academic department or office is aware of the records management policy and follows it;
* consult the Director of the Library on matters related to retention and disposition of records and develops the ‘retention schedule’ for the records of the academic department or office;
* establish the level of confidentiality and security appropriate to specific types of records and helps the department maintain and monitor confidentiality and security.
The custodian will work with staff in the library to understand the application of these procedures to the department’s records and to develop a retention schedule. In some offices there will be more than one custodian because the nature of the records requires expertise to manage them properly. The custodian is not necessarily the person who created the record or who holds it during its ‘active’ life. The custodian may be the department or office head or someone else with authority to make discretionary decisions on the control of the records being produced. The responsibilities of the custodian should be added to job descriptions.
6. Official Copies and Duplicates
Most records will eventually have multiple copies in several offices and departments at the College. There is only one ‘official copy’ and the ‘custodian’ in the office holding the ‘official copy’ is the ‘official custodian’ and is responsible for its retention and possible classification as an archival record. Copies may be kept as long as they are useful unless the office or department has the ‘official copy.’

7. Committee Records and Responsibilities of Chairs of Committees
Chairs of all committees are the ‘official custodian’ of the records related to the committee’s work. In general, all procedure development, accrediting procedures, academic department curricular change activities, and other similar efforts create records which will be of interest to College Archives and result in ‘permanent’ records. A copy of such records should be sent to Library. See the General Retention Schedule for more information.

8. Personnel Records (see also the General Retention Schedule)
The ‘official copy’ of all records related to an employee are retained and maintained by the Human Resources Office. Departments and offices may keep duplicate copies for convenience, but all material that is kept by the department or office must be copied to the official custodian. See the General Retention Schedule for more information on personnel records. Students who work in jobs that are NOT part of their educational experience are treated as all other employees for the purposes of record keeping. However, most students are paid to do jobs as a result of a financial aid award or as an integral part of their CCCC education. In that case their employment information is maintained as a student record with the unique obligations associated with student records.

9. Employment Search Committee Records
At the end of a search, the chair of a search committee should collect from each member of the committee all files, notes, applications, recommendations and other material related to that search. This material should be reduced to one ‘official copy’ of each record with the
rest destroyed. All email and other electronic records should be printed and kept with other print documents and the e-copy deleted from the email system. All search committee members should delete all electronic files related to the search from their computers, email programs, and hard drives. In faculty searches the reduced paper file should be retained by the academic department making the hire for three (3) years and then destroyed. For all other searches the complete paper file should be sent to and retained by the Office of Human Resources.

10. Academic Department Records

Academic department and program files are critical for documenting the history of the College and should be kept, managed, and archived in a manner consistent with the guidelines provided in this policy. If a current chair maintains the records in his or her own office or on his or her own computer exclusively, the chair is responsible for transferring all electronic and paper records to the departmental assistant when his or her term as chair ends. Record keeping and management should not begin anew with each chair transition. There should be an ongoing process of records management for the department/program. In the case of confidential materials in the possession of the chair, those should be marked as such (and placed in a sealed envelope if appropriate) and maintained within the department/program files. See the General Retention Schedule for information about personnel files, and section 11 below. The departmental assistant is a key link in long term maintenance of departmental records. The assistant should be entrusted with knowledge of all departmental records and assist in their maintenance, even if the records are physically kept in the department chair’s office.

11. Sponsored Research, Grants, External Support Records

Faculty members and other grantees will have files related to external support. There are special rules that apply to funds received from the Federal government and each grant may have its own set of rules and requirements related to records. All grantees are responsible for helping the College comply with these rules and requirements.

12. Faculty Professional Papers and Records

Academic departments are responsible for maintaining and helping to preserve information about curricular offerings and the history of the department as a teaching and research unit. Faculty members are encouraged to contact the Director of the Library when they retire and to discuss the retention of their papers and records for historical preservation.

13. Records Destruction

Following a ‘retention schedule’, records should be securely maintained for the period of retention either in the office or department where they were created or used or when space is a problem, transferred elsewhere for storage.
Records that have been identified as 'archival records' must be sent to College Library for permanent retention. Records that will not be listed on a retention schedule and therefore may be destroyed at any time include:

- material that is not considered a ‘record;’ (see: Definition of a record)
- duplicates of an ‘official copy’ which is stored and retained by another office such as personnel records, financial and budget information, external grant funding, copies of information used in an employee search; and
- records that have served their purpose and are no longer needed such as drafts of reports and notes that have been turned into minutes of meetings.

When there is doubt about whether or not a record may be destroyed, the custodian should review the retention schedule, consult with the custodian of the ‘official copy’ of the record, if one exists, and consult with the Director of the Library to ensure that there is no need to store or permanently archive the record.

Office records that have been transferred to storage during the retention period must be destroyed by the office that sent them. Each office and academic department sending records to storage is responsible for tracking when the retention period has ended. Office records that have been placed in the library for permanent retention will be open for users according to the policies of the Library and within the discretion of the librarian.

Destruction includes:
- Recycling – generally appropriate for all non-confidential paper documents, including public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts or policies or other memos which are not confidential.
- Shredding – using a cross-cut or strip shredder for all documents that should not be read by others after they are no longer needed or that contain personnel or confidential information. This is essential for any document containing personal information, information that is student protected information under FERPA, health related information, or financial information.

The College contracts with a company called Secure Shred for the destruction of confidential information. Their bin is located in the recycling center located outside the boiler room entrance. These bins are available only for permanent destruction of large volumes of confidential material, as the cost for this service is higher than the cost of disposing of shredded material.

14. Electronic Records

Many records are created and maintained in an 'electronic' format. These include documents on your computer’s hard drive, email and its attachments, and documents that have been scanned and reside on CDs or on other removable storage media. File
maintenance of these records requires coordination among the places where they are stored – hard-drives on desk tops, laptops, on shared drives such as the Novell H and P drives (network systems), and on removable storage media. It is important to remember that desktop applications are designed for communicating information, and transmitting knowledge. They make communicating with others more simple and efficient, but they are not designed for permanent retention of records. Issues of file authentication, version-control, duplication, maintenance, access and permanency are more acute with electronic records.

Any electronic record that needs to be kept for a retention period longer than seven (7) years should be printed and kept in a paper filing system OR maintained in an electronic format and the equipment needed to read or access the information kept and maintained for the same period of time. For retention periods shorter than seven (7) years it is believed that storage on DVD or CD format will be reliable and readable. Any electronic record that merits permanent retention should be maintained electronically AND printed and kept in a paper filing system. An electronic file that has permanent value to the College should be printed and transferred to Library. Records that are maintained only in electronic format should be named and labeled in a manner that is consistent with the paper filing system used in the office for ease of coordination and cross-referencing.

15. Jenzabar Data System

The Jenzabar data system is the College’s electronic data system. College-wide electronic data systems generally contain information that if lost, corrupted or disclosed without authorization could result in the impairment of business functions at the College. In addition some data on these systems contain private data that if lost, corrupted or disclosed without authorization could also result in claims involving invasion of personal privacy, loss of reputation or creditability, and violation of federal or state laws or regulations or College contracts. These systems are generally only made available to approved users.

All data in Jenzabar or any other data system will have an individual responsible for the integrity of the data in the system. That person is responsible for verifying that electronic data and the record created from the data are not been inappropriately altered, in other words can verify that it is authentic. He or she is responsible for ensuring adherence to policies about access, loss prevention and security to prevent corruption.

The Jenzabar data system is backed-up by the College in order to ensure business continuation in the event of a disaster or crisis. Therefore, individual offices only need to retain their copies of Jenzabar information while they are useful. One notable exception involves special compilations of data that offices or departments may create using data from Jenzabar. Because the way data is preserved or changed over time, it may not always be possible to re-create a compilation of data in the future. Any report created from special compilations, as opposed to merely printing data from the system, should be retained by the office or department creating it as the ‘official copy.’

All College faculty, staff and students entrusted with electronic data must adhere to these practices:

- Keep data secure against unauthorized creation, updating, processing, outputting and distribution;

- Appropriately secure data and keep it inaccessible to non-approved users when not in use;

- Use, retain, and dispose of data consistent with these procedures; Develop procedures related to appropriate and frequent back-up of data systems and their storage in locations that will keep them available in the event of a disaster affecting the original data system;

- When creating reports from data bases, maintaining the same level of confidentiality in the report as exists for protection of the original data.
- Reports containing private or confidential data should be disposed of properly which means shredding all paper copies and erasing hard drives and disks so that the data are not retrievable. Consultation with Information Technology Services' staff on how to properly erase hard drives is vital before computers are transferred to other users or discarded.

16. Electronic Mail
Electronic mail should be treated like any other electronic record. Mail that has information that should be retained according to a 'retention schedule' should be printed and filed as would any other paper record. Email is not 'backed-up' centrally. Each email user is responsible for retaining email containing important information. The "files" embedded in your Outlook account are NOT permanent storage and should not be used for permanent or long-term storage purposes. For more information please see the official College policy on electronic mail.

Finally, saving email using the 'save as' function in Outlook saves the content as a Word file but does not save the embedded data in a regular email that gives the properties of the message, such as the identity of the sender's computer, or the route the message took before arriving in your mailbox. Saving email as archived mail does preserve these properties and may be important if there is ever a dispute about the origin of the email. It is like saving the envelope that comes with a letter via the postal service. Therefore, email correspondence related to contracting and other activities in which verification of the sender is important should be archived as email for the retention period if possible.

17. College Archives Storage
Using the 'records retention schedule' developed for each office, the records 'custodian' and the Director of the Library should discuss what records may be transferred to the Library for either storage during the retention period or permanent retention. If certain records do not fall under the retention schedule, the records custodian and the Director of the Library should discuss access and disposition BEFORE material is sent to library.

Record sent to the library
and are not of permanent value are open only to the original office sending the records. Individuals from other offices may request access to these records by submitting the request in writing to the office of origin. Any records, reports, publications, etc., that have been widely disseminated are open to all users. Records of permanent value are open ten (10) years after the date of creation. Minutes of meetings, such as faculty minutes and academic departmental minutes are restricted for seventy-five (75) years.
18. Records Related to Web sites
Because Web sites have replaced many publications they are a significant archival record of the College and its operation. Web masters and others creating Web page content should capture copies of their Web site's content as e-files on CD or DVD and send them to College library for permanent retention. The College currently lacks space to retain archived copies on its servers and Web sites are not routinely backed-up. If a Web site is changed without preserving the original content it cannot be retrieved from the College servers.

19. Legal Claims – Litigation Holds
If a legal claim is reasonably anticipated or is filed, or a lawsuit begun, the affected offices should immediately contact the Vice President for Administrative Services. This office will issue instructions to keep all records and data systems until further notice. This instruction overrides all standard and existing practices with respect to record destruction and storage. In some cases the VP of Administrative Services office will ask that all relevant documents be given to that office for maintenance during the duration of the legal matter.

20. Contact Information

Questions about retention schedules, storage at archives, procedure interpretation
Jennifer Schroeder, Director of the Library
785-243-1435 x 226

Questions about the Jenzabar data system
David Marick
Director of Information Technology
785-243-1435 x255
General Retention Schedule
This schedule will NOT include all records that should be on a schedule. Custodians should consult with the Director of the Library to develop a retention schedule for records not mentioned here. This schedule applies to all types of records, regardless of media or format, including documents, email, photographs, audiotapes, videotapes, CDs, and DVDs. Retention periods reflect minimum time periods. Records may be retained for longer periods of time at the discretion of the custodian or as required by legal counsel. Do not destroy any records while they are subject to audit, investigation, or where investigation is probable. Records that are in storage areas such as basements, warehouses, or backrooms are often at risk of water damage, destruction, theft or confidentiality or other security breach and should be evaluated in light of this schedule.

Financial Records
Questions: Vice President for Administrative Services 785-243-1435 x 204

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<tr>
<th>General Type</th>
<th>Description</th>
<th>Retention Period</th>
<th>Comments</th>
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<tbody>
<tr>
<td>Financial records</td>
<td>Budget worksheets, printouts, account books, ledger, purchase records, purchase orders, travel expense reports</td>
<td>7 years following activity</td>
<td>The business office is the official custodian of these records</td>
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<td>Financial records</td>
<td>Warranty information, purchase orders with contractual terms</td>
<td>7 years following the date of purchase or 7 years following the end of the warranty period whichever is later</td>
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<td>General Type</td>
<td>Description</td>
<td>Retention Period</td>
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<td>Personnel Records</td>
<td>The official personnel record must contain:</td>
<td>7 years after the last date of employment</td>
<td>By law the &quot;personnel record&quot; does not include &quot;information of a personal nature about a person other than the employee if disclosure of the information would constitute a clearly unwarranted invasion of such other person's privacy&quot; (KSA)</td>
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<td>- The employees name, address, and date of birth,</td>
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<td>- job title and description</td>
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<td>- rate of pay and other compensation paid</td>
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<td>- starting date of employment, job application, resumes, or other forms of</td>
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<td>employment inquire submitted by the employee to the employer in response</td>
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<td>to the employers' advertisement;</td>
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<td>- performance evaluations including list of probationary periods,</td>
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<td>- waivers signed by the employee'</td>
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<td>- written warnings of substandard performance</td>
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<td>- termination or separation notices</td>
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<td>- documents related to</td>
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<td>Category</td>
<td>Description</td>
<td>Retention Period</td>
<td>Notes</td>
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<tr>
<td>Faculty Personal and Professional papers</td>
<td>Records related to faculty research, teaching creative work or other materials used by the faculty member</td>
<td>Permanent</td>
<td>Faculty members are encouraged to contact the Director of the Library upon retirement because these records often have permanent value to the college.</td>
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<tr>
<td>Faculty appointment, reappointment, tenure and promotion</td>
<td>All records related to appointment and subsequent history of individuals to join the faculty, including correspondence.</td>
<td>7 years following retirement or departure from the college</td>
<td>Before destruction these records should be evaluated by the Director of the Library for historical value. Destruction of records in this category should only be by shredder or other means that will make them unreadable.</td>
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<tr>
<td>Personnel Search Faculty Search</td>
<td>Vacancy announcement, advertisements, applications, evaluations, references, correspondence, email, and all documents or material</td>
<td>3 years following the successful hire or close or the search without a hire</td>
<td>The chair of the search committee is responsible for keeping and organizing a record of the search and for ensuring the destruction of duplicate copies.</td>
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<td>General Type</td>
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<td>Retention Period</td>
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<td>College policies and procedures</td>
<td>Forms, procedure manuals, guides, handbooks, etc</td>
<td>Destroy when they are no longer in effect. The Library will retain policy documents permanently.</td>
<td>The departments or office creating the record should provide a copy to the Director of the Library for evaluation</td>
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<tr>
<td>Projects, programs, proposals</td>
<td>Notes from meetings, reports, conceptual documents, financial support, all records related to projects or</td>
<td>Retain until a project has been completed and evaluate for permanent retention in the Library</td>
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<td><strong>College-wide committee records</strong></td>
<td>Programs developed by non-academic offices</td>
<td><strong>Permanent</strong></td>
<td><strong>Send to Library on a regular schedule</strong></td>
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<td>Minutes, reports, and other materials generated by college-wide committees and reports and documents about or related to the operation of college-wide committees or other offices around the college. Examples-efforts leading to accreditation of the college and its programs, college-wide strategic planning, commencement.</td>
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**Student Records**

Questions: Registrar, 785-243-1435 x 208

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<thead>
<tr>
<th><strong>General Type</strong></th>
<th><strong>Description</strong></th>
<th><strong>Permanent</strong></th>
<th><strong>Comments</strong></th>
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</thead>
<tbody>
<tr>
<td><strong>Student Records Registrar</strong></td>
<td>Student grades, transcripts and personal information (addresses, phone numbers, etc)</td>
<td>Permanent</td>
<td>The official custodian is the registrar of the College</td>
</tr>
<tr>
<td><strong>Student Records, Admissions, advising</strong></td>
<td>Applications, transcripts, acceptance letters, transfer records for students who have matriculated, advising record related correspondence.</td>
<td>7 years after graduation or voluntary withdrawal</td>
<td>At the end of the retention period the Director of the Library may sample a class for permanent retention</td>
</tr>
<tr>
<td><strong>Student records Financial Aid</strong></td>
<td>Records showing evidence of providing</td>
<td>7 years after graduation or</td>
<td>Before destroying records related to</td>
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</tbody>
</table>