

Records Retention and Disposal Policy

1. Statement

Keck Graduate Institute (KGI) is committed to effectively managing records to meet legal standards, protect confidential information, optimize the use of space, and retire outdated records when appropriate. All KGI administrative and academic departments are required to participate in the College's records management program.

2. Purpose

The purpose of this Records Retention and Disposal Policy is to establish guidelines for the management, retention, and disposal of electronic media and paper records at Keck Graduate Institute (KGI). This policy ensures compliance with legal requirements, promotes the efficient use of resources, and safeguards the protection of sensitive information.

The policy identifies documents that must be retained permanently or temporarily. It also provides procedures for the routine and timely disposal of documents that need not be retained for legal or administrative reasons and have no historical value.

Retention periods may change due to government regulations, judicial or administrative orders, private or governmental contracts, suspected or pending litigation, or audit requirements. Retention schedules should be suspended when records are involved in litigation.

3. Scope

This policy applies to all employees, contractors, and agents of KGI who create, maintain, or have access to institutional records in any format, including electronic, paper, and other media.

4. Definitions

- **Records:** Any information created or received by KGI in the course of its business activities, regardless of format or medium, that provides evidence of KGI's policies, procedures, operations, decisions, transactions, or other activities.
- **Sensitive Information:** Any information that, if disclosed, could cause harm to individuals, KGI's operations, or its stakeholders. This includes personally identifiable information, financial records, medical records, proprietary information, and other confidential data.

5. Administration

The Vice President of Finance & Administration is responsible for developing and implementing policies governing the retention and disposal of KGI's records. The VP of Finance & Administration may designate others, on an ad hoc basis, to assist in implementing the record retention policy, including the following:

- Identify and evaluate which records should be retained.
- Publish a retention and disposal schedule that is in compliance with local, state, and federal laws.
- Monitor local, state, and federal laws affecting record retention
- Annually review the record retention and disposal program
- Develop a training program for personnel responsible for record storage and maintenance
- Monitor for compliance with the record retention and disposal program

Each department will prepare a listing of major documentation used and maintained by the department and will compare it to the documents listed in the Record Retention Policy. In addition, each department chair will periodically review the currently used records and forms to determine whether these records and forms are adequate and appropriate for the department's requirements.

Each department chair will periodically review the policy to determine if there are any special circumstances that necessitate changes in the retention periods. Requests for changes in retention periods or deviations from specified retention periods should be made to the Business Office at finance@kgi.edu, and may be implemented only after approval by Cabinet.

6. Record Retention Guidelines:

- **Retention Period:** Records shall be retained for the period required by applicable legal, regulatory, and contractual requirements, as well as for operational and historical purposes. The attached Records Retention Schedule lists different types of Records and the length of time those Records must be retained. Since no document can cover all situations, questions and concerns regarding retention period or class of documents not included in the Records Retention and Disposal Schedule should be addressed to the Business Affairs Office.
- **Review and Update:** All departments shall periodically review and update record retention schedules to ensure compliance with changing legal and regulatory requirements and to reflect evolving business needs.
- **Litigation:** All Records pertaining to ongoing or pending audits or lawsuits (including reasonably anticipated lawsuits) should not be destroyed, damaged, or altered, even if the records retention date has expired, until the matter has been resolved and you have been specifically advised in writing by the Business Affairs Office/HR/Legal Counsel that such Records may be destroyed. If you have reason to believe that a Record scheduled for destruction may pertain to any of these matters, do not destroy the Record and contact your immediate Cabinet member and/or the Business Office.

7. Record Disposal Guidelines

- **Electronic Media Transfer:** All electronic media must be properly sanitized before it is transferred from the custody of its current owner using appropriate sanitization methods.
- **Secure Disposal:** Records shall be disposed of securely to prevent unauthorized access, loss, theft, or other breaches of confidentiality.
- **Methods of Disposal:** Disposal methods may include shredding, physical destruction, electronic wiping, degaussing, or other secure destruction methods appropriate to the format of the records.
- **Approval:** Disposal of records shall be authorized by designated personnel in accordance with approved retention schedules and disposal procedures.

8. Responsibilities

- **Records Custodians:** Employees responsible for creating, maintaining, or managing records shall ensure compliance with this policy, including proper categorization, retention, and disposal of records under their control.
- **Records Management:** The Business Office shall oversee the implementation and enforcement of this policy, including the development of retention schedules, disposal procedures, and training programs.

9. Training and Awareness

- **Training Programs:** KGI shall provide training programs to educate employees on their responsibilities under this policy, including proper records management practices and the importance of compliance.
- **Awareness Campaigns:** KGI shall conduct awareness campaigns to promote understanding of the importance of records retention and disposal among employees and stakeholders.

10. Compliance and Enforcement

- **Monitoring and Auditing:** KGI shall monitor compliance with this policy through regular audits and reviews of records management practices.
- **Consequences of Non-Compliance:** Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or contract.

11. Revision and Review

This policy shall be reviewed periodically and revised as necessary to ensure its continued effectiveness and compliance with legal and regulatory requirements.

12. Contact Information

For questions or concerns regarding this policy, please contact your immediate supervisor or the Business Office at finance@kgi.edu.

13. Approval

This Records Retention and Disposal Policy has been approved by Cabinet and the Audit & Risk Committee and shall be effective as of May 13, 2024.

14. Policy Version History

Version	Date	Description	Approved By
1.0	05/10/2024	Initial Policy	Cabinet, Audit & Risk Management Committee & Board of Trustees
2.0	05/30/2024	Update purpose and records retention chart – Personnel Data Record	Human Resources
3.0	06/04/2025	Update the responsible officer	VP of Finance & Administration

Responsible Officer – Vice President of Finance & Administration

**KECK GRADUATE INSTITUTE***A Member of The Claremont Colleges***KGI - RECORDS RETENTION CHART**

Type of Record	Retention Schedule in Years	Responsible Department
CORPORATE RECORDS		
Articles of Incorporation	Permanent	Business Affairs Office/Finance
Charter/Bylaws	Permanent	Secretary of the Board of Trustees
Minutes of the Board of Trustees and its committees	Permanent	Secretary of the Board of Trustees
Deeds & Title	Permanent	Business Affairs Office/Finance
Contracts (construction)	Life of Building or 13 after end of term, whichever is longer	Facilities Department
Other contracts	5 years after end of term	Business Affairs Office/Finance
Leases	Life of Lease Plus 4 Years	Business Affairs Office/Finance
License information/permits	While licenses are active and 3 thereafter	Business Affairs Office/Finance
Real Property Records	Permanent	Business Affairs Office/Finance
Tax exemption documents, determination letters; and related state and federal documents	Permanent	Business Affairs Office/Finance
Copyrights, trademarks, service marks, patents, and share/stock certificates	Permanent	Business Affairs Office/Finance (stored at TCCS Financial Services)
CORRESPONDENCE		
Unimportant letters and notes which require no acknowledgement or follow-up.	Do not retain	All Departments
Other letters of inconsequential subject matter to which no further reference will be necessary	Within 30 days (including related correspondence)	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 Year	All Departments
Letters requesting specific action such as name or address change, complaints which have no further value after changes are made or action taken	1 Year (if in doubt, consult legal counsel)	All Departments

Type of Record	Retention Schedule in Years	Responsible Department
EDUCATIONAL & STUDENT RECORDS		
Accreditation and licensure records	Permanent	Office of the VP of Academic Affairs
Curriculum Development	Until obsolete or 1, whichever is longer	Office of the VP of Academic Affairs
Faculty and student handbooks	Permanent	Office of the VP of Academic Affairs
Admissions records (non-attending)	3 Years after application term	Office of Admission
Student academic records (grades, transcripts, transfer credit, grade changes, etc.)	Permanent	Office of the Registrar
Student transcript requests	1 Year 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 Medical Records	7 Years from date of graduation or withdrawal	TCCS Student Health Services
Counseling & Mental Health Records	7 Years from date of graduation or withdrawal	TCCS Monsour Psychological & Counseling Services
Alumni records	Permanent	Office of Development
LIBRARY RECORDS		
All records related to purchases or acquisitions	Per TCCS Record Retention Policy	TCCS Financial Services
Library applications/cards	Per TCCS Record Retention Policy	TCCS Financial Services
FINANCIAL AID RECORDS		
Reports to the Department of Education (DOE)		
Financial Aid records/Fiscal Operations	3 Years after end of award year	Office of Financial Aid
International Student Loan Original promissory note	7 Years	Office of Financial Aid
Loan amount, terms, repayment and history	3 Years after loan is satisfied (34 CFR 668.24)	Office of Financial Aid
Tuition and fee charges	5 Years from last posting	Business Affairs Office
Student account files (1098T, financial registration card, tuition payment agreement, student account receivable, etc)	4 Years after graduation or date of last attendance	Office of Student Accounts
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 Years after student ceases to attend	Office of Financial Aid

Type of Record	Retention Schedule in Years	Responsible Department
FINANCE, ACCOUNTNG & GENERAL		
ADMINISTRATION RECORDS		
Audited financial statements	Permanent	Business Affairs Office/Finance
W-2's, 1099's, 990's payroll, and other tax returns with supporting documentation	Per TCCS Record Retention Policy	TCCS Financial Services
Cash Management	Per TCCS Record Retention Policy	TCCS Financial Services
Check Registers/Cancelled checks	Per TCCS Record Retention Policy	TCCS Financial Services
Deductions/earnings registers	Per TCCS Record Retention Policy	TCCS Financial Services
Accounts payable distribution	Per TCCS Record Retention Policy	TCCS Financial Services
Accounting Records	10 Years	TCCS Financial Services
Auditors' reports, opinions, disclaimers and management reports	7 Years	TCCS Financial Services
Bank reconciliations/Bank Statements	Per TCCS Record Retention Policy	TCCS Financial Services
Budget documents	5 Years	Business Affairs Office/Finance
Conflict of Interest Statements	7 Years	HR/IPTT Committee
Copies of source documents supporting purchases	Until disposal of equipment +4	Individual Departments
Fixed asset records monthly reports	Per TCCS Record Retention Policy	TCCS Financial Services
Fixed asset records year end reports	Per TCCS Record Retention Policy	TCCS Financial Services
General ledgers	Per TCCS Record Retention Policy	TCCS Financial Services
Grants	Life of Grant plus 10 years	Office of Sponsored Research/Business Office
Insurance policies and related claims, reports and investigations	Per TCCS Record Retention Policy	TCCS Financial Services
Investments, Endowments	Last Five Years	Business Affairs Office/Finance
Journal vouchers with support	Per TCCS Record Retention Policy	TCCS Financial Services
Purchase or improvement of fixed assets	Period of time asset held +6	Facilities Department
Vendor histories	Per TCCS Record Retention Policy	TCCS Financial Services
Advancement, endowment and gift records	Permanent	Office of Advancement
Legal files/affidavits	Consult legal counsel	Business Affairs Office/HR
Drafts of documents superseded by final versions	Do not retain	Business Affairs Office
Letters denying liability of KGI or which KGI might need to produce in court to disprove liability or to enforce KGI's rights.	Consult legal counsel	Business Affairs Office/Finance
FACILITIES/EQUIPMENT RECORDS		
Annual Reporting of Crime Statistics	7 Years	Campus Safety/HR
Campus Crime Log/Incident Reports	7 Years	Campus Safety
Equipment depreciation records	Per TCCS Record Retention Policy	TCCS Financial Services
Fire protection and emergency powers equipment testing	4 Years	Facilities Department
Facilities operational manuals	Life of Building	Facilities Department
Records of fire and other emergency drills	6 Years	Facilities Department/HR
Records of inspections	2 Years	Facilities Department

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Type of Record	Retention Schedule in Years	Responsible Department
Emergency plans	1 Year	Facilities Department
Records of hazardous wastes	Per DTSC Standards (https://dtsc.ca.gov/reporting-recordkeeping-standards/)	Facilities Department
Remediation & Abatement	Permanent	
Inventory of hazardous wastes	1 Year	Facilities Department
Digital Surveillance Files	30 days or when the recorder system overwrites itself, whichever is shorter	Campus Safety/IT Department

PERSONNEL DATA RECORDS

All payroll & Benefits records	Per TCCS Record Retention Policy	TCCS Financial Services
Chemical safety, toxic exposure, and other OSHA records	30 Years	Facilities Department
Logs of occupational injuries and illnesses (OSHA form 300A)	5 from the end of the year of reporting	Office of Human Resources
Illness injury prevention program	1 Year	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 Years 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 Years	Office of Human Resources
Help wanted ads, job opening notices	3 Years	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 Years	Office of Human Resources
Job inquiries sent to KGI	2 Years	Office of Human Resources
Notices of opportunities for training	3 Years	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/Office of Dean of Research for LabSafety
Timecards	6 Years	Office of Human Resources
Whistleblower documentation	7 Years after conclusion of investigation	Office of Human Resources
Worker's compensation files	15 Years	Office of Human Resources

Type of Record	Retention Schedule in Years	Responsible Department
PUBLIC RELATIONS RECORDS		
Clippings (historical)	Permanent	Office of Advancement/Marketing
Permissions to release information and photos	Permanent	Office of Advancement/Marketing
Photographs (historical)	Permanent	Office of Advancement/Marketing
Press releases	3 Years	Office of Advancement/Marketing
In-house publications	Permanent	Office of Advancement/Marketing