

HAVERFORD COLLEGE

Records Retention Schedule

NATURE OF RECORD		RESPONSIBLE OFFICE ¹	REQUIRED RETENTION ²
1.	General		
1.1.	Correspondence – General (<i>i.e.</i> containing no significant information relating to the College)	Originating Office	One year
1.2.	Correspondence – Administrative (<i>i.e.</i> containing significant information about the College)	Originating Office	Ten years
1.3.	Correspondence – Executive (<i>i.e.</i> regarding significant events or the development of the College’s administrative structure, policies and procedures)	Originating Office	Permanent
1.4.	Correspondence relating to contract, copyright, patent, or an official document	Originating Office	Life of the principal document
1.5.	Event Files	Originating Office	Reviewed annually
1.6.	Outside Board, Commission, Association and Membership Organization Information	Originating Office	Five years from the expiration of the commitment to the organization

¹ For certain categories of Records, the “Originating Office” is designated as the Responsible Office. The Originating Office is the College office where a Record is first created or received from a sender external to the College.

² Certain categories of Records are subject to a “review annually” Retention Period. Personnel in the Responsible Office will review those Records annually, disposing of Records that are no longer necessary for or relevant to the operation of the Responsible Office.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
1.7.	Personal Files (<i>e.g.</i> hot topics, special projects, tasks)	Originating Office	Review annually
2.	Institutional		
2.1.	Accreditation Documents	President's Office	Permanent
2.2.	Board of Managers – Documents of the Full Board or its Committees (<i>e.g.</i> correspondence, minutes, meeting handouts)	President's Office	Permanent
2.3.	Cabinet Meeting Minutes	President's Office	Permanent
2.4.	Calendars	President's Office	Ten years
2.5.	Institutional Policies and Manuals	President's Office	Permanent
2.6.	Organizational Charts	President's Office	Permanent
2.7.	President's Presentations and Speeches	President's Office	Permanent
2.8	Strategic Plans	President's Office	Permanent
3.	Faculty and Academic Affairs		
3.1.	Academic Actions, Sanctions and Appeals	Dean of the College	Permanent for student dismissals; Ten years from graduation or last date of attendance for all others
3.2.	Academic Program Audit Results ³	Provost	Permanent
3.3.	Articulation Agreements	Provost	Permanent

³ Pennsylvania institutions must conduct a rotating audit of academic programs so that each program is audited at least every 5 years to determine whether the program should be continued, revised, or discontinued. The results of the most recent audit must be submitted to the Pennsylvania Department of Education upon request. 22 Pa. Code § 31.51.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
3.4.	Enrollment Statistics	Registrar	Permanent
3.5.	Faculty Meeting Minutes	Provost's Office	Permanent
3.6.	Faculty Policies and Handbook	Provost's Office	Permanent
3.7.	Master Calendar	Dean of the College	Permanent
3.8.	Pre-tenure Evaluation Procedures	Provost	Permanent
3.9.	Promotion Criteria	Provost	Permanent
3.10.	Tenure, Promotion and Reappointment Faculty Files	Provost	Seven years from last date of employment
3.11.	Individual Faculty Personnel Files	Provost	Seven years from last date of employment
4.	Admission and Financial Aid		
4.1.	Admissions Documents (enrolled students)	Dean of the College	Five years from graduation or last date of attendance
4.2.	Admissions Documents (individuals who do not enroll)	Dean of the College	Three years from receipt
4.3.	Federal Family Education Loan Program and Direct Loan Program Records	Dean of Admission and Financial Aid	Records relating to a student or parent borrower's eligibility and participation must be retained for three years after the award year during which the student last attended the College. ⁴ Other records relating to the College's participation in the FFEL or Direct Loan Program, including records of any other reports or forms, must be retained for three years after the award year in which the records are submitted. ⁵

⁴ 34 C.F.R. § 668.24(e)(2)(i).

⁵ 34 C.F.R. § 668.24(e)(2)(ii).

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
4.4.	Federal Student Aid Audits, Program Reviews and Investigations	Dean of Admission and Financial Aid	If any Title IV loan, claim or expenditure is questioned by a Title IV program audit, program review, investigation or other review, the records must be maintained for the longer of the applicable Required Retention period or until the expenditure issue is resolved with the U.S. Department of Education ⁶
4.5.	Federal Work Study	Dean of Admission and Financial Aid	Records relating to administration of the program must be retained for three years after submission of the Fiscal Operations Report for the award year ⁷
4.6.	Foreign Student Records (F-1)	Dean of the College	Three years after the student is no longer pursuing a full course of study ⁸
4.7.	Visa Scholar Records (J-1)	Dean of the College	Three years following the completion of each exchange visitor program ⁹
4.8.	Pell Grant	Dean of Admission and Financial Aid	Records relating to administration of program must be retained for three years after the award year ¹⁰
4.9.	Perkins Loan Program – Administration of Program Records	Dean of Admission and Financial Aid	Records relating to administration of program must be retained for three years after the award year ¹¹
4.10.	Perkins Loan Program – Disbursement and Electronic Authentication and Signature Records	Controller	Disbursement and electronic authentication and signature records for each loan made using a Master Promissory Note must be retained for three years from the date the loan is canceled, repaid or otherwise satisfied ¹²

⁶ 34 C.F.R. § 668.24(e)(3).

⁷ 34 C.F.R. § 668.24(e).

⁸ 8 C.F.R. § 214.3(g).

⁹ 22 C.F.R. § 62.10(g).

¹⁰ 34 C.F.R. § 668.24(e).

¹¹ 34 C.F.R. § 668.24(e).

¹² 34 C.F.R. § 674.19(e)(3)(i).

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
4.11.	Perkins Loan Program – Repayment Records	Controller	Repayment records, including cancellation and deferment requests must be retained, for three years from the date on which a loan is assigned to the Secretary of Education, canceled or repaid ¹³
4.12.	Supplemental Educational Opportunity Grant Program	Dean of Admission and Financial Aid	Records relating to administration of program must be retained for three years from the submission of the Fiscal Operations Report for the award year ¹⁴
5.	Diversity and Equity		
5.1.	Discrimination Complaints (Student)	Dean of the College	Seven years from resolution
5.2.	Training	Director, Human Resources (employees) Dean of the College (students)	Seven years after training session
6.	Finance and Administration		
6.1.	Accounts Payable Records	Controller	Current plus seven years
6.2.	Accounts Receivable Records	Controller	Current plus seven years
6.3.	Annual Budget	Controller	Permanent
6.4.	Audit Reports	Controller	Permanent
6.5.	Audit Work Papers	Controller	Conclusion of audit plus seven years

¹³ 34 C.F.R. § 674.19(e)(3)(ii).

¹⁴ 34 C.F.R. § 668.24(e)

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
6.6.	Bank Statements and Canceled Checks	Controller	Current plus seven years
6.7.	Bills and Payment Records	Controller	Current plus seven years
6.8.	Book of Accounts	Controller	Current plus seven years
6.9.	Contracts and Related Correspondence	Controller	Seven years after expiration of contract
6.10.	Federal Sponsored Research Records (including financial records, supporting documents, statistical records, and all other records pertinent to award)	Controller	Three years from the date of submission of the final expenditure report or, for awards renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report; Three years from final disposition for records for real property and equipment acquired with Federal funds; If litigation, claim or audit arises before the end of the three-year period, retain until matter resolved and final action taken. ¹⁵
6.11.	Financial Statements	Controller	Permanent
6.12.	Fixed Asset Records	Controller	Permanent
6.13.	Form 990	Controller	Permanent
6.14.	Institutional Survey and Reporting Records (IPEDS)	Office of Institutional Research	Permanent for final reports, surveys and forms
6.15.	Invoices	Controller	Current plus seven years
6.16.	Payroll Documents	Controller	Current plus seven years
6.17.	Payroll – Individual Time Reports	Controller	Current plus seven years
6.18.	Purchase Orders	Controller	Current plus seven years

¹⁵ OMB Circular A-110, section 53.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
6.19.	Records Supporting Items of Income, Deductions and Credits	Controller	Current plus seven years
6.20.	Stock Transactions	Controller	Current plus seven years
6.21.	Pennsylvania New Hire Report	Controller	Two year from filing date
7.	Human Resources		
7.1.	ADA Accommodation Files	Director, Human Resources	Seven years from last date of employment ¹⁶
7.2.	Background Check Records	Director, Human Resources	Seven years from date of report
7.3.	Benefit Plan Documents	Director, Human Resources	Permanent
7.4.	EEO-1 Reports	Director, Human Resources	Seven years from date of filing
7.5.	Employee Benefit Files (Excluding Pension and Retirement Records)	Director, Human Resources	Seven years from termination of employee's (former employee's) benefits
7.6.	Employee Discipline Files	Director, Human Resources	Seven years from last date of employment
7.7.	Employee Handbooks	Director, Human Resources	Permanent
7.8.	Employee Medical and Exposure Records (Hazardous Material Exposure)	Director, Human Resources	Duration of employment plus 30 years
7.9.	FMLA Records	Director, Human Resources	Seven years ¹⁷

¹⁶ 29 C.F.R. §§ 516.5 and 516.6; 29 C.F.R. §§ 1602.14 and 1602.49.

¹⁷ Note that regulations identify documents that must be kept for the retention period. See 29 C.F.R. § 825.500.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
7.10.	Injury and Illness Incident Reports and Related OSHA Forms/Logs	Director, Human Resources	Current plus five years
7.11.	I-9 Forms	Director, Human Resources	Three years from date of hire or one year from last date of employment, whichever is later ¹⁸
7.12	Pension Plan/Retirement Records	Director, Human Resources	Retain pension plans and ERISA-qualified benefit plan descriptions permanently. Retain employee eligibility, employee personal information, and records of pension plans paid to employees or beneficiaries for six years after the death of the employee and beneficiary.
7.13.	Personnel Files (including application, resume, appointment/salary forms, contracts, performance evaluations, etc.)	Director, Human Resources	Seven years from last date of employment ¹⁹
7.14.	Pre-Employment Records For Applicants Who Are Not Hired (<i>e.g.</i> applications, resumes, interview notes, etc.)	Departments	Three years from date of rejection notification
7.15.	Unemployment Compensation Records	Director, Human Resources	Four years from date last contribution relating to the record has been paid ²⁰
7.16.	Workers Compensation Records	Director, Human Resources	Duration of benefits plus four years
8.	Information Technology		
8.1.	Emergency Response Information	CIO	Permanent

¹⁸ 8 C.F.R. § 274a.2(b)(2).

¹⁹ 29 C.F.R. §§ 516.5 and 516.6; 29 C.F.R. §§ 1602.14 and 1602.49; 29 C.F.R. § 1620.32; 29 C.F.R. § 1627.3.

²⁰ 43 P.S. § 766.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
9.	Institutional Advancement		
9.1.	Advertisements and Commercials	Director, Communications	Permanent
9.2.	Alumni and Constituent Records	Director, Gifts and Records	Stored in electronic format as updated
9.3.	Annual Donor/Giving and Stewardship Reports	Director, Donor Relations	Permanent
9.4.	College Catalogs	Archives	Permanent; Originating office to send two copies to the College Archives when issued
9.5.	Donor Gift Records (<i>i.e.</i> endowment agreements, letters of intent, estate notes, wills, etc.)	Director, Donor Relations	Permanent in electronic format
9.6.	Photo Release Forms	Director, Communications	Permanent
9.7.	Photos and Video Footage	Director, Communications	Review annually
9.8.	Press Releases – General (<i>i.e.</i> containing no significant information relating to the College)	Director, Communications	Five years
9.9.	Press Releases – Administrative (<i>i.e.</i> containing significant information about the College) or Executive (<i>i.e.</i> regarding significant events or the development of the College’s administrative structure, policies and procedures)	Director, Communications	Permanent
10.	Intellectual Property		

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
10.1	Copyright Records	Director, Communications	Permanent
11.	Real Property		
11.1.	Building Plans, Blueprints and Design Plans	Director, Facilities Management	Permanent; Transfer to the College Archives after building destruction
11.2.	Deeds	Archives	Permanent
11.3.	Engineering Studies and Reports	Director, Facilities Management	Permanent
11.4.	Hazardous or Toxic Waste Disposal or Abatement Records (Manifests, etc.)	Director, Facilities Management	Permanent
11.5.	Leases	Director, Facilities Management	Seven years after termination of lease
11.6.	Licenses and Permits	Director, Facilities Management	Permanent
11.7.	Material Hoists, Personnel Hoists, Elevator Standards and Certification Records	Director, Facilities Management	Four years
11.8.	Material Safety Data Sheets (MSDS)	Director, Facilities Management	30 years
11.9.	Mechanical and Electrical Equipment Check Records	Director, Facilities Management	Four years
11.10.	Operational Manuals	Director, Facilities Management	Life of the equipment or building
12.	Risk Management		

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
12.1.	Asbestos Records (abatement, claims, etc.)	Director, Human Resources	Permanent
12.2.	Insurance – Closed Claims (no litigation)	Director, Human Resources	Seven years or until claimant turns 21 years of age, whichever is later
12.3.	Insurance Policies	Director, Human Resources	Ten years after expiration
12.4.	Litigation Files (includes subpoenas)	Director, Human Resources	Ten years from termination of litigation or service of subpoena
12.5.	Title IX Records	Dean of the College	Seven years ²¹
13.	Safety and Security Reports		
13.1.	Annual Safety and Security Reports ²²	Director, Safety and Security	Permanent
13.2.	Crime Reporting – Documents Underlying and Required to Substantiate Pennsylvania Uniform Crime Reports ²³	Director, Safety and Security	Seven years
13.3.	Crime Reporting – Documents Underlying and Required to Substantiate Federal Campus Crime Reports (Clery Act)	Director, Safety and Security	Seven years ²⁴
13.4.	Fire Reporting – Documents Underlying and Required to Substantiate Fire Safety Report Documentation	Director, Safety and Security	Five years ²⁵

²¹ 34 C.F.R. § 106.45(10)

²² 22 Pa. Code § 33.111

²³ 22 Pa. Code § 33.111

²⁴ 20 U.S.C. § 1092(f)(1)(F); 34 C.F.R. § 668.24.

²⁵ 20 U.S.C. § 1092(i); 34 C.F.R. § 668.24.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
13.5.	Incident Reports – Students	Director, Safety and Security	Seven years from graduation or last date of attendance
14.	Student Affairs		
14.1.	ACT/SAT/TOEFL Exam and Score Reports	Registrar	Five years from graduation or last date of attendance; Three years from receipt for individuals who do not enroll
14.2.	ADA Files	Office of Disability Services	Seven years from graduation or last date of attendance
14.3.	Athletic Eligibility Forms	Director of Athletics	Seven years from graduation or last date of attendance
14.4.	Career Center Student Credential Files	Center for Career and Professional Advising	Current plus seven years
14.5.	Change of Curriculum Forms and Authorizations	Registrar	Five years from graduation or last date of attendance
14.6.	Change of Final Grade Forms	Registrar	Permanent
14.7.	Change of Information Forms	Registrar	Five years after graduation or last date of attendance
14.8.	Clubs and Organizations – Faculty Advisor Agreements	Dean of Student Life	Three years
14.9.	Clubs and Organizations - Registrations	Dean of Student Life	Three years
14.10.	Commencement Programs	President’s Office	Permanent
14.11.	Counseling Files and Records	Director, Counseling	Seven years from date of last visit ²⁶

²⁶ 49 Pa. Code § 41.57.

NATURE OF RECORD		RESPONSIBLE OFFICE	REQUIRED RETENTION
14.12.	Dean's Panel Records (Student Discipline Records)	Dean of the College	Permanent for student dismissals; Ten years from graduation or last date of attendance for all others
14.13.	Drop/Add/Withdrawal Form	Registrar	Five years from graduation or last date of attendance
14.14.	FERPA – Consent for Records Disclosure	Registrar	Five years from date of consent termination
14.15	FERPA – Disclosure Requests and Disclosures	Registrar	To be kept for the life of the student record file ²⁷
14.16.	FERPA – Requests for Nondisclosure of Directory Information	Registrar	Until request withdrawn by student; if not withdrawn, permanent
14.17.	Final Grade Reports	Registrar	Permanent
14.18.	Graduation Lists	Registrar	Permanent
14.19.	Health Services Records	Director, Health Services	Seven years from graduation or last date of attendance ²⁸
14.20.	Honor Council Records	Dean of the College	Permanent for student dismissals; Ten years from graduation or last date of attendance for all others
14.21.	International Study Agreements and Contracts	Dean of the College	Five years from the expiration of the agreement/contract.
14.22	Student Academic Files (Departmental)	Originating Department	Five years from graduation or last date of attendance
14.23.	Transcript Request Forms	Registrar	One year
14.24.	Transcripts	Registrar	Permanent

²⁷ 34 C.F.R. § 99.32.

²⁸ 49 Pa. Code § 16.95; 28 Pa. Code § 115.23; 45 C.F.R. § 164.530.