

MEMORANDUM

TO: CCAC Faculty, Administrators and Staff
FROM: Tony DiTommaso
DATE: March 3, 2020
RE: Update to Record Retention Procedures

Dear Colleagues:

As part of the College's effort to ensure that its record retention schedule and practices are up to date and model best practices, the College will be implementing an update to the Records Retention Schedule in July of 2020 which addresses the retention period for email messages stored on the College's email server. This memo summarizes the changes that will be occurring, and provides guidance regarding alternatives that employees can utilize to store records that may be contained in or attached to email communications.

Changes to Email Retention Period

Effective July 1, 2020, the College will implement a two (2) year retention period for emails stored on the College's email server. This means that email communications that are transmitted through the server, either by virtue of having been sent from or received by a CCAC-issued email account, will be removed from the server two years after the date that the original email message was created, sent or received. The removal of email messages from the server that are beyond the two-year retention period will occur automatically, and without need for action by the individual user. Thereafter, emails that are beyond the two-year retention period will be removed from the server on a quarterly basis, on or about the first business day of the months of October, January, April and July of each respective calendar year. Email messages that are the subject of a current litigation hold order will continue to be preserved and maintained, either on the server or via a separate dedicated storage system, in accordance with and for the duration of the applicable hold order.

Types of Email Messages Impacted

The retention period applies to all email messages currently stored on the College's email server. From a user perspective, this means all email messages that are stored in your Outlook account folders, including emails appearing in your Inbox, Sent Items, Deleted Items, or in any other individual folders that you may have created. Again, beginning July 1, 2020, emails that are stored in these folders that are more than two years old will be removed from the server on a quarterly basis.

Basis for Implementing the Email Retention Period

The retention of email messages for an unlimited period is not an economically feasible, technologically practical or legally sound practice. Unlimited storage capability requires an ever-increasing investment of time, labor and server hardware to store the email messages, many of which are extremely dated and no longer possess any current operational or legal relevance. Moreover, the continued maintenance of this data makes it potentially subject to review by outside parties through various forms of legal process,

thereby potentially requiring inordinate amounts of time and cost to compile, review and produce. The implementation of the retention period described above will therefore assist in mitigating these costs, as well as improve efficiencies and reduce backup and other clutter in individual user email accounts.

Alternative Storage Options

As discussed in the College's Records Management Regulation, email messages, in and of themselves, do not necessarily constitute a record of College business. Whether an email message should be treated as a business record depends upon the function and content of the individual message. For example, if an email message represents business correspondence regarding a matter, in the sense that it is taking the place of a letter or other written correspondence, then that email should be retained by the designated custodian for the period of time required for that type of correspondence under the Records Retention Schedule. Similarly, if the email was utilized to transmit an attachment, such as a contract, report or completed form, then that attachment must be maintained by the designated custodian for the period specified in the Record Retention Schedule. In these circumstances, the custodian should print and store the email and/or its attachments in a hard copy file, or electronically save them to the user's network drive or another approved electronic document management system for the duration of the applicable retention period.

Next Steps

Over the next several months, you will receive multiple reminders from the ITS department regarding the upcoming July 1, 2020 implementation of the email retention period, as well as invitations to participate in training sessions that will show you how to electronically save, store and retrieve emails. In addition, an updated copy of the College's Record Retention Schedule and a short instruction sheet for how to print and save emails electronically are being provided under cover of this memorandum for your future reference. If you have any questions or need further assistance with printing or saving emails, you may also contact the CCAC ITS ServiceDesk.

After July 1st, the ITS department will communicate to email account holders one month, one week and one day prior to each purge date to alert users of the need to print or electronically save any email records which are beyond the two-year retention period in an alternative location.

On behalf of the Records Management Committee and the ITS Department, I thank you for your time to review the material in this memo, and your anticipated assistance in implementing this initiative.

Best regards,



Tony DiTommaso
Vice President & General Counsel

Email Content: Printing and Saving Emails

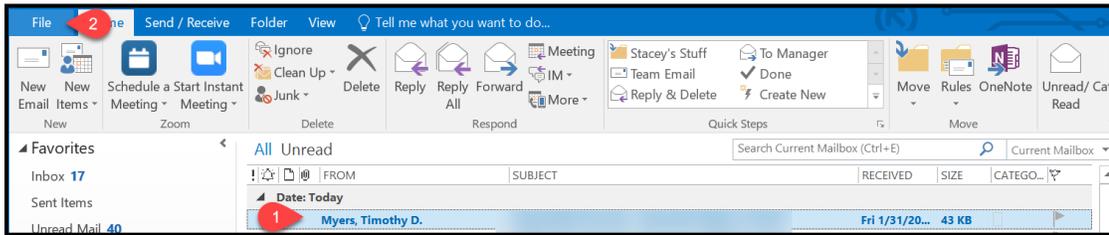
This document will guide you through printing email to save as a hard copy and saving emails to a shared drive or personal documents folder.

PRINTING EMAILS

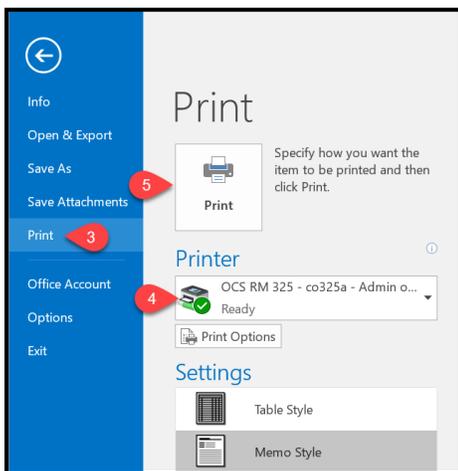
When printing email, if the information is confidential, secure it properly according to FERPA. Additionally, when disposing documents, if the information is considered sensitive, ensure the document is disposed of according to FERPA.

1. PRINTING FROM EXCHANGE

1. Select the email by clicking it once or double click to open the email
2. Click **File**

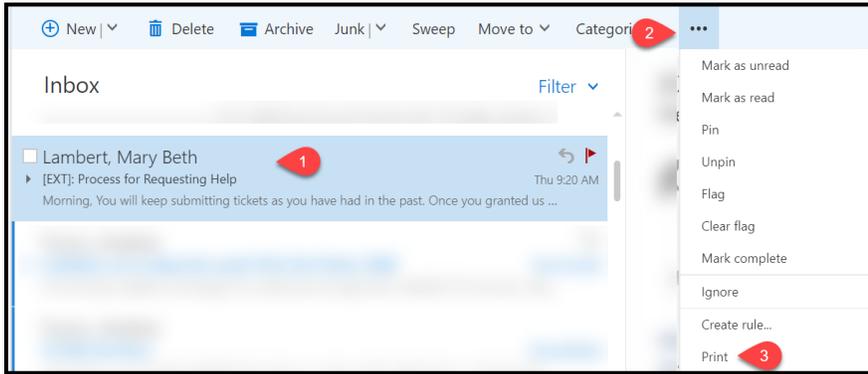


3. Click **Print**
4. Select the desired printer
5. Click **Print**



2. PRINTING FROM OUTLOOK WEB ACCESS (OWA)

1. Select the mail by clicking it once or double click to open the email
2. Click the ellipsis (...)
3. Click **Print**

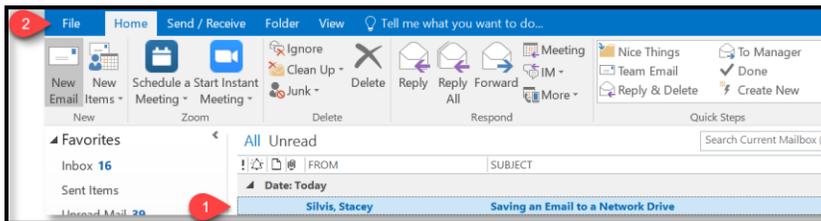


SAVING EMAILS

When saving emails, be sure to save to a CCAC network drive or locally on your workstation. All users should refrain from saving emails to a cloud hosted service such as Google Drive and Box. ITS does not support these services and cannot restore the information if necessary. Be sure to remove any unwanted files from network drives to ensure adequate storage.

1. SAVING FROM EXCHANGE

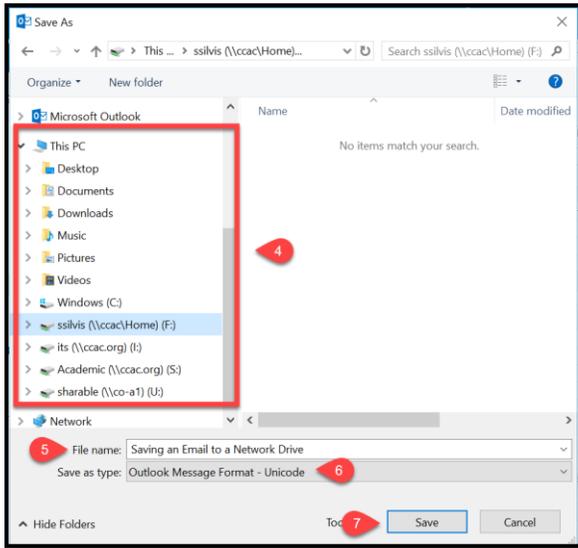
1. Select the email by clicking it once or double click to open the email
2. Click **File**



3. Click **Save As**

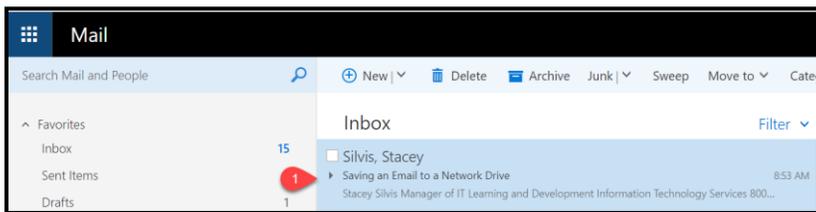


4. In the **Save As** dialog box, in the **Folder** pane, select the **folder** or **network location** where you want to save the file
5. In the **File name** box, name the file
6. In the **Save as type** list, accept the default type
7. Click **Save**

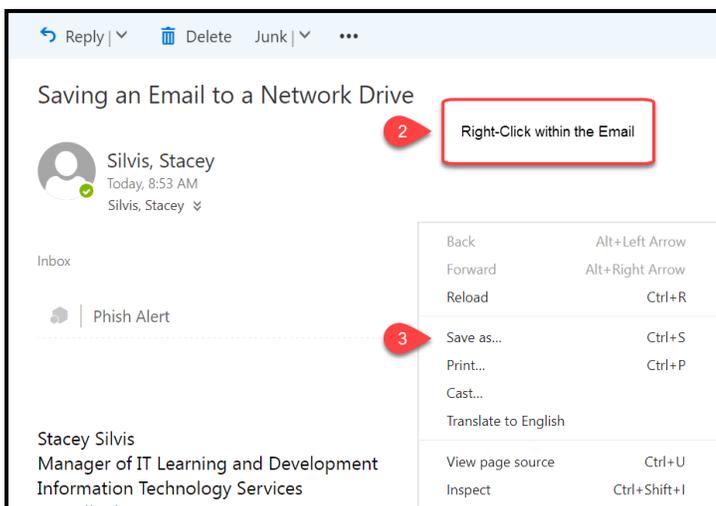


2. SAVING FROM OUTLOOK WEB ACCESS (OWA)

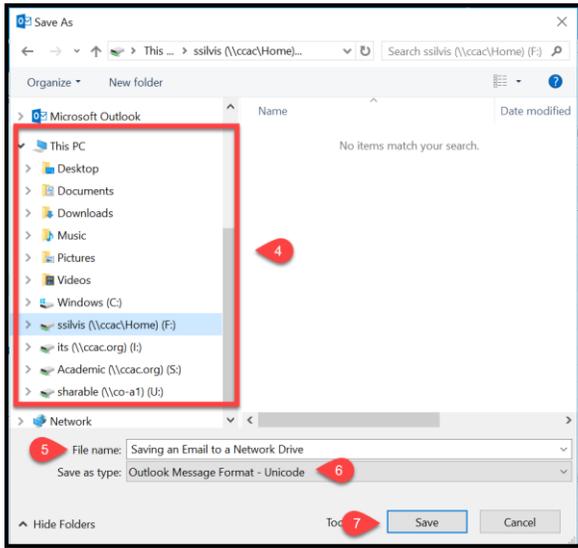
1. Double click on the email to open it



2. Right-click within the email
3. Select **Save As** from the shortcut menu



4. In the **Save As** dialog box, in the **Folder** pane, select the **folder** or **network location** where you want to save the file
5. In the **File name** box, name the file
6. In the **Save as type** list, accept the default type
7. Click **Save**



HOW TO GET SUPPORT

If you have any questions regarding CCAC technology, contact the CCAC ITS Services.

 **Voice:**
[412.237.8700](tel:412.237.8700)

 **Email:**
help@servicedesk.ccac.edu

 **Chat:**
<https://chat.ccac.edu>

RECORDS MANAGEMENT REGULATION

<i>Policy Reference(s):</i>	II.08
<i>Responsible Department(s):</i>	President's Office; General Counsel
<i>Approval Date:</i>	2/4/2016
<i>Revision Date(s):</i>	8/15/2016; 3/3/2020

In accordance with *Board Policy II.08*, all College employees are responsible for identifying and routing records that each employee, campus or department creates, uses or disseminates to the official custodian for the record. Custodians for specific records are identified in the *Records Retention Schedule*. This Regulation sets forth procedures to direct and assist employees to comply with and implement this requirement.

Questions regarding retention periods and/or whether a document constitutes a record should be directed to the designated custodian or to the College's General Counsel.

DEFINITIONS

The term **“record”** includes any materials or portions thereof, regardless of physical form or characteristics, made or received in any College department, office or campus in pursuance of law or in connection with the transaction of College business. Records may include—but are not necessarily limited to—memoranda, letters, applications, reporting forms, minutes, agendas, reports, articles, project files, drafts, worksheets, notes or other documents, slides and other presentation materials, computerized data and programs, computer hardcopy printouts, computer related magnetic materials (e.g., computer diskettes and magnetic tapes), digital media, microfilm, microfiche and telecommunicated or electronically transmitted materials such as facsimile, email and other similar electronically transmitted information. Retention periods listed in the *Records Retention Schedule* apply to records in all forms and formats. The fact that a record is created and stored electronically or digitally rather than on paper has no bearing on its retention status. Unless otherwise so designated, informal materials of transitory utility (e.g., temporary notes of internal meetings, casual or personal email and facsimile transmittal cover sheets) shall not be considered “records” for purposes of this Regulation.

“Records Management Committee” refers to the committee designated by, and at the discretion of the College President, which is charged with the responsibility to periodically review and evaluate this *Records Management Regulation* and the *Records Retention Schedule*, and to recommend revisions and updates to the same, as needed, to the College President.

“Custodian” refers to the senior administrator or their designee in the department or office responsible for the record.

CUSTODIAN REQUIREMENTS

Custodians are responsible for maintaining, preserving and disposing of records for which they are responsible in accordance with the retention periods specified on the *Records Retention Schedule*. All records, whether created or stored on electronic systems, must be retrievable and available for the entire retention period listed on the *Records Retention Schedule*. In this regard, note that the *Records*

Retention Schedule generally expresses retention periods in terms of the number of calendar years to be added to the current calendar year. For example, if a record's retention period is classified as "7 Years," a record created any time during the year 2020 must be kept until December 31, 2027.

Custodians shall not utilize portable electronic media, such as personal computer folders, CD-ROMS, DVD-ROMS or USB flash drives, as the exclusive means to store original records. All College records that are maintained in electronic format must be stored on servers or other media designated and approved by the College's Information Technology Services (ITS) Department.

The custodian is responsible for disposing of records after the applicable retention period has expired. Disposal of records must occur in a manner to ensure that protected, private or confidential information contained in such records is not obtained or retrieved by unauthorized persons. Such disposal may require actions such as shredding, burning, degaussing and overwriting prior to disposal.

Custodians are responsible for ensuring that records which are the subject of a litigation hold, as described below, are preserved regardless of the expiration of any retention period, and that such records can be retrieved and produced upon request by the College's General Counsel. Failure to maintain records in accordance with this Regulation and the *Records Retention Schedule* may be cause for disciplinary action, up to and including termination of employment.

NON-CUSTODIAN REQUIREMENTS

Individual employees may, from time to time, originate or receive copies of records for which they are not listed as the custodian on the *Records Retention Schedule*. In such cases, the original of the record in question should be promptly routed to the identified custodian. Non-custodians should dispose of their own personal copies of a record after they no longer have a practical academic, operational or business use for the record, except in the following circumstances:

1. The non-custodian is aware of a compelling academic, operational or business need warranting longer retention of the record;
2. The non-custodian is aware that the record is related to actual or pending litigation;
3. The non-custodian is notified that the record is the subject of a litigation hold; and/or
4. The non-custodian is otherwise advised by the custodian of the record, the Records Management Committee or the College's General Counsel to retain such record.

If any employee has a question regarding the appropriate custodian for a specific record, or is unsure whether the identified custodian has the original, he or she should contact the custodian or the College's General Counsel for clarification.

REQUIREMENTS FOR ELECTRONIC RECORDS

The College's Information Technology Services Department, in collaboration with the Records Management Committee, will recommend appropriate systems and media for electronically storing records. At a minimum, these systems must:

1. Permit the search and retrieval of stored records in a timely and efficient fashion;
2. Restrict access to only authorized users;

3. Contain security features which preserve the integrity and confidentiality of electronic records and minimize the risk of their unauthorized alteration or erasure;
4. Retain the records in a usable format for the entire length of their designated retention period;
5. Facilitate and permit the timely disposition of records in accordance with the *Records Retention Schedule*; and
6. Provide backup of records for emergency/disaster recovery purposes.

Electronic records must be identified sufficiently to enable authorized personnel to retrieve, protect and carry out the disposition of documents in the system. Electronic records should also be maintained in a manner which permits College personnel to correlate the record with related records maintained in paper, microform or other media format.

Security/Confidentiality

Confidentiality of student educational records which are stored in electronic form must be maintained in accordance with the requirements of federal and state law regulations. Electronic media systems on which such records are stored must, at a minimum, contain password protection and appropriate firewalls.

The disposal of electronically stored records must be done in a manner which ensures that privacy protected or other confidential information cannot be reconstructed. The College's Information Technology Services Department will be responsible for developing procedures to ensure the proper disposal of such electronically stored information.

EMAILS AND NETWORK USER ACCOUNTS

Email messages, in and of themselves, do not constitute records. Retention and disposal of email messages depends upon the function and content of the individual message. E-mail messages and attachments that meet the definition of a record must either be promptly printed and filed in the appropriate manual filing system or converted to an electronic record for storage on the applicable electronic records storage system. The College's email system should not be utilized by designated custodians as the means to store or maintain original records. Email messages and attachments that do not meet the definition of a record should be disposed of in the same manner as non-custodial documents and records.

Email Retention Period

The retention period for email stored on individual CCAC email accounts (@ccac.edu) and on the CCAC email server will be two (2) years. With the exception of email messages that are within the scope of a then current Litigation Hold Order, all email stored on the CCAC email server that is beyond the email retention period will be automatically removed from the CCAC email server on a quarterly, calendar year basis (e.g. on or about January 1; April 1; July 1; October 1 each year). Items contained in Outlook folders, including items in both user created and standard folders (e.g. Sent and Deleted Items), will also be removed from the server during each cycle. Current College email account holders will receive a reminder notification prior to each scheduled cycle.

Email messages removed from the email server will be archived, via backup tape or other archiving system approved by the College's ITS Department, for a period of five additional years. Recovery of

emails from backup tapes or other archiving systems will not be permitted, unless authorized under the College's disaster recovery protocols or to the extent required to comply with an audit, accreditation review, subpoena or other form of legal process.

Email and Network User Account Deactivation

The following actions will be taken whenever a **CCAC Employee** separates from employment:

1. The CCAC Human Resources Office (HR) will promptly notify ITS of the employee's separation date.
2. The employee's associated (@ccac.edu) email account will be disabled effective as of the separation date, unless different date is specified by HR.
3. An automated email response will be established to respond to email messages sent to the separated employee's account for a period of forty-five (45) days following the separation date. The automated message will notify the sender that the intended recipient is no longer employed at CCAC, and to direct future correspondence to another designated College employee.
4. Current employees will not be granted access to a separated employee's email account except in cases of compelling business necessity, and only upon prior approval of HR and the College's General Counsel. Access will be granted for a maximum period of forty-five (45) days, absent an extension period approved by HR and General Counsel.
5. The contents of a separated employee's email account will be actively retained for 45 days following the separation date. Thereafter, the contents will be copied to and stored on backup tape for a period of one (1) calendar year following the separation date. All user groups will be removed from the account at this time.
6. A separated employee's Active Directory Account will be disabled effective as of the employee's separation date, and the account will be placed in inactive status (**Former Employee**) for a period of 45 days. The Active Directory Account will thereafter be removed from the system and all associated information will be deleted after the expiration of this 45-day period.
7. Deletion and/or disposition of backup tapes, email and active directory account information will be suspended in all cases in which the separated employee is the subject of or within the scope of a current Litigation Hold Order.
8. There are occasions on which a **Former Employee** may need access to information maintained on the CCAC network following his/her separation, such as obtaining access to certain benefit and payroll information and documents maintained on the network. All such requests must be directed to the CCAC Office of Human Resources for review and approval.
9. Upon receipt of an access request from a **Former Employee**, the **Former Employee** will be directed to create a *temporary account* that will provide him/her with limited access pertinent to their Human Resource record. The *temporary account* will remain active for a 48 hour period.
10. Except to extent provided above, **Former Employees** will not be provided access to their former CCAC email account or any other network or IT-related accounts.
11. In the event that a **Former Employee** enrolls as a student at CCAC following his/her separation date, the **Former Employee's** former email and network accounts will not be reactivated or recovered. The **Former Employee** will be assigned a new **Current Student** account with a corresponding student email account.
12. In the event that a **Former Employee** is subsequently rehired by CCAC as an adjunct faculty instructor, a temporary position, or in some other capacity, his/her **Former Employee**

account will not be reactivated or recovered. A new **Current Employee** account with corresponding email account will be established at that time.

The following actions will be taken whenever a CCAC **Adjunct Faculty** separates from employment:

1. **Adjunct Faculty** email and network accounts will be deactivated and deleted upon a separation of employment from CCAC, in the same manner as applicable to other separated employees. Separation of service will be determined in accordance with Article IX of the Adjunct Faculty Collective Bargaining Agreement.
2. HR and/or the Office of the Academic Dean for Adjunct Services will promptly notify IT of the separation date whenever an **Adjunct Employee** is separated as a result of resignation, termination or failure to complete an assignment. HR/Academic Dean for Adjunct Services will provide IT with a list, on a biannual basis, of Adjunct Employees whose service at CCAC has been separated as a result of a gap in service, as provided under the CBA.

The following actions will be taken when a student is no longer enrolled at CCAC:

1. A student's status will be changed from **Current Student** to **Former Student** whenever the student has not registered for or taken a class at CCAC for a period of 6 months following the student's last attended term end date.
2. Students classified as **Former Students** will have limited access to system resources and no access to their student email account.
3. If a **Former Student** has not registered for a class at CCAC or otherwise taken action to change their status to a **Current Student** within thirty (30) days following the change of status to **Former Student**, then the account will be changed to "Deactivated" status and the Student's Active Directory account and associated email account will be removed and purged from the system at that time.
4. **Deactivated Students** that require access to information maintained on CCAC's network will be required to follow the same process for creating a temporary account described above for **Former Employees**. Access available through the temporary account will be similar to that available individuals classified as **Former Students**, and will not include access to the **Deactivated Students** former student email account. The temporary account will only be active for 48hrs upon creation, then purged from the system.

Non-Employee and Non-Student Accounts

If a **Student Applicant** requires access to personal information maintained on a CCAC network service, then the **Student Applicant** will be directed to create a *limited access account* that will provide him/her with limited access closely resembling that of a **Former Student** (does not include an email account). The temporary account will remain active for a period of one (1) calendar year from the date of creation. If the **Student Applicant** does not become an active student within this period, then his/her temporary account will convert to a **Deactivated Student** status and be deleted. If the Student Applicant registers for classes at CCAC, then the account will automatically be transitioned to **Current Student** account status.

A **Partner Account** may be requested for one or more individuals or third party vendors that conduct business with or perform work for CCAC, including but not limited to affiliated faculty employed by area school districts that teach courses that are eligible for credit at CCAC under an established

College in High School or Dual Enrollment agreement between CCAC and the affiliated faculty member's employer. **Partner Accounts** will be provided access to certain designated network systems and resources, as may be required or needed in connection with the work to be performed, and may also be issued a CCAC (@ccac.edu) email account if needed in order to perform their contracted role or service. The active duration of a **Partner Account** will be based upon the nature and length of the work to be performed by the **Partner Account** holder.

Requests to establish a **Partner Account** must be directed to IT, and include the approval of the vice-president or executive director whose department or division is responsible for managing the relationship or contract with the vendor. Requests to establish a **Partner Account** must also include an expected termination/deactivation date for each account, with a maximum active time-frame of one (1) year from the date created.

IT will distribute a list of active Partner Accounts on an annual basis, and request confirmation that the account should remain active. **Partner Accounts** that are no longer needed, as a result of termination or conclusion of the business relationship with the third party vendor or as a result of the vendor employee no longer performing work at CCAC, will be deactivated. Failure to confirm the need to continue a **Partner Account** will also result in the **Partner Account** being deactivated. **Deactivated Partner Accounts** will thereafter be purged in the same manner applicable to **Former Employee** accounts described above.

Event Accounts may be requested for special events or college functions. **Event Accounts** will be maintained only for the duration of the event and/or functions for which they were created. **Event Accounts** will not have a CCAC (@ccac.edu) email account.

LITIGATION HOLD ORDERS

In the event of litigation or pending litigation, the College's General Counsel will issue a litigation hold order. The litigation hold may be communicated initially by phone but will be followed by a written notification (see Appendix E). **RECORDS WHICH ARE THE SUBJECT OF A LITIGATION HOLD ORDER SHALL BE IMMEDIATELY SUSPENDED FROM DISPOSITION AND/OR DISPOSAL AND SHALL NOT BE DESTROYED UNDER ANY CIRCUMSTANCES.**

The College's General Counsel will decide which records are subject to the litigation hold and in which form the records will be retained or produced. Custodians of records which are within the scope of the hold will be responsible for making such records available for review and retrieval by the College's General Counsel.

RECORDS RETENTION SCHEDULE

<i>Policy Reference(s):</i>	II.08
<i>Responsible Department(s):</i>	President's Office; General Counsel
<i>Approval Date:</i>	2/4/2016
<i>Revision Date(s):</i>	8/15/2016

HOW TO USE THE RECORDS RETENTION SCHEDULE:

The *Records Retention Schedule* lists records that are created, received or retained as a result of College operations. The Schedule includes a description of each record, the identity of the record's official custodian, the minimum period that the record must be retained, and a disposal code. To the extent that a record may fall into more than one category contained in the Schedule, the longer retention period should be followed.

Disposal Codes:

Disposal codes are used to indicate the recommended means of disposing of a record after its retention period has expired:

1. **Routine Handling**—No special precautions are necessary upon disposal. The records should be recycled or disposed of in accordance with standard procedures.
2. **Special Handling**—The destruction of records containing privileged, confidential, exempt or sensitive information that requires special handling by shredding, burning, degaussing, overwriting or another method that reduces information to an illegible condition.
3. **Archival Retention**—Records requiring permanent retention or records that have sufficient archival or historic value must be preserved in perpetuity. Archived records may be converted to electronic or microform/microfiche format.

Unlisted Records:

For any record not covered by the retention schedule, the Records Management Committee will determine how long the record must be kept and recommend any necessary revisions to the retention schedule. Questions regarding retention periods or whether an item constitutes a record should be directed to the Records Management Committee and/or General Counsel.

RECORDS RETENTION SCHEDULE

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
INSTITUTIONAL RECORDS / BOARD OF TRUSTEES			
a. Bylaws	Permanent	President's Office	3
b. Meeting Notices	Permanent	President's Office	3
c. Agendas	Retain one copy permanently if not included with minutes. Retain duplicate copies as long as of administrative value	President's Office	3
d. Minutes – Official/Approved	Permanent	President's Office	3
e. Notes/Recordings and Material Used to Prepare Official Minutes	Until official minutes are approved	President's Office	2
e. Membership Lists/Appointments	Permanent	President's Office	3
f. Curriculum Vitae	5 years after resignation of Board Member	President's Office	2
g. Statement of Financial Interest Forms	5 years after resignation of Board Member	President's Office	2
College Charter/ Recognition	Permanent	President's Office	3
College Policy & Regulation Manuals	Permanent	General Counsel	3
LITIGATION/LEGAL			
a. Pleadings & litigation related documents – court and administrative agencies	5 years after final resolution, including any appeals	General Counsel	2
b. Executed settlement agreements	Permanent	General Counsel	3
c. Labor Negotiation Materials	5 years after contract expiration	General Counsel	2
d. Labor Board Certifications	Permanent	Human Resources and General Counsel	3
e. Reduction in Force/Early Retirement/Reorganization/Exit Incentive Plans and related documents	12 years	General Counsel	3
f. Copyrights – College Owned	3 years after expiration	General Counsel	2
g. Patents – College Owned	6 years after expiration	General Counsel	2
h. Trademarks – College Owned	6 years after expiration	Marketing	2
Mission/Vision & Strategic Plans	Permanent	President's Office	3
News Releases	As long as there is administrative value	Marketing	1
Organization Charts	Retain one copy permanently if not included with minutes. Retain duplicate copies as long as of administrative value.	Human Resources	2
Right to Know Requests / Responses	2 years	Open Records Officer	2
FINANCIAL RECORDS			
Tax returns	Permanent	Finance/CFO	3
IRS Determination Letter	Permanent	Finance/CFO	3
Budgets	Permanent	Finance/CFO	3
a. Budget Books and Board Recommendations	7 years	Budget Office	2
b. Budget Planning and Preparation Records	7 years	Budget Office	2
Financial Statements (Audited)	<i>Periodic:</i> retain until final completion of audit. <i>Certified:</i> permanent	Controller's Office	2, 3
a. General Ledger & Trail Balance Records	Permanent	Accounting	2
b. Board Statements	7 years	Accounting	2
c. Annual Audit and Financial Reports	7 years	Accounting	2
IRS Rulings	10 years after receipt of ruling	Finance/CFO	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
ACCOUNTS PAYABLE / RECEIVABLE			
a. Accounts payable records	7 years	Accounts Payable	2
b. Books of Account	7 years	Accounts Payable	2
c. Financial statements; annual reports to government agencies	7 years	Accounts Payable	2
d. Records of property subject to gain or loss treatment	Permanent	Accounts Payable	2
e. Records supporting items of income, deductions and credits	7 years after taxable disposition	Accounts Payable	2
f. Letters of Credit - Student - Used	7 years	Bursar	2
g. Letters of Credit – Student – Unused	1 year	Student Accounts	2
h. Invoices	7 years	Accounts Payable	2
h. Journal Entries	7 years	Accounts Payable	2
i. Payments Made Under Contracts and Leases	<i>General Contract:</i> 6 years after termination or expiration <i>Construction Contracts:</i> 12 years after termination	Accounts Payable	2
j. Accounts Payable and Receivable Ledgers	7 years	Accounts Payable	2
k. Accounts Receivable Records	7 years	Accounts Payable	2
l. Accounts Distribution Summaries (weekly/monthly)	3 years	Accounts Payable	2
m. Accounts Distribution Summaries (year-end)	7 years	Accounts Payable	2
n. Expense Reports – Employees	7 years	Accounts Payable	2
Accounts Reconciliation Records	3 years	Accounting	2
Equipment & Furniture Inventory Records	5 years after superseded or obsolete	Accounting	2
Fixed Assets Inventory	Permanent	Accounting	3
Unclaimed Property Report Records	3 years after remitted to state	Accounting	1
f. 1099 forms (employer’s copy of U.S. information return for calendar year)	7 years	Accounts Payable	2
EDUCATIONAL FOUNDATION			
Annual Donor Reports	7 years	Foundation	2
Annual Financial Reports	Permanent	Foundation	3
Annual Giving Reports	Permanent	Foundation	3
Donor Gift Deposit Records	7 years	Foundation	2
Donor Gift File	Permanent	Foundation	3
CONTRACTS / PURCHASE ORDERS			
Purchase Orders	7 years	Procurement	2
Invoices	7 years	Accounts Payable	2
Contracts – General Operating (supply; operating; aux. services)	6 years after termination/expiration of contract	Director of Contracts	2
Background Check Certifications – Auxiliary Services Personnel	3 years after termination of contract	Procurement	2
Contracts – Academic			
a. Clinical Affiliation Agreements	6 years after termination/expiration of contract	Director of Contracts	2
b. Articulation Agreements	6 years after termination/expiration of contract	Provost	2
Publicly Bid Contracts and Documents – Awarded	6 years after termination/expiration of contract	Procurement	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
Public Bid Records – Proposed & Unsuccessful Bidders	7 years after job completion	Procurement	2
Request for Proposals – Awarded Contract	6 years after termination/expiration of contract	Procurement	2
Request for Proposals – Rejected Proposals and Related Vendor Information	4 years after job completion	Procurement	2
Construction Contracts	12 years after termination/completion of work	Procurement	2
PROFESSIONAL SERVICES CONTRACTS			
a. Architect/Engineering/Design Services	6 years after termination or expiration of warranties	Chief Facilities Officer	2
b. Legal Services/Engagement Letters	6 years after termination or completion of engagement	General Counsel	2
c. Consulting Services	6 years after termination or expiration	Director of Contracts	2
REAL ESTATE / FACILITIES			
Options to Purchase Real Estate	6 years after expiration of option	Chief Facilities Officer	2
Deeds	Permanent	Chief Facilities Officer	2
Building/Property Leases, Title Reports, and Mortgages	7 years after CCAC's obligations terminate	Chief Facilities Officer	2
Real Property / Purchase or Sale Agreements	Permanent	Chief Facilities Officer	3
Building plans, blueprints and design plans	Permanent, unless or until structure is reconstructed or is no longer CCAC property/responsibility	Chief Facilities Officer	3
Licenses and Permits	Permanent	Chief Facilities Officer	3
Management Engineering Studies and Reports	Permanent	Chief Facilities Officer	3
Maps	Permanent	Chief Facilities Officer	3
INSURANCE / RISK MANAGEMENT			
Insurance Policies and Claim Files	6 years after final settlement or expiration of policy, provided all claims are settled	Director, Risk Management	2
Incident / Accident Reports	5 years, provided all claims are settled	Director, Safety & Security	2
MEDICAL RECORDS			
Health Career Health Records (initial and update forms)	Permanent	Academic Dean for Program	3
STUDENT SERVICES			
Academic Forgiveness Form	3 years	Campus Registration	2
Address and Name Change form	3 years	Campus Registration	2
Advisor/Program Change form	5 years	Campus Registration	2
Application for Credit Transfer	6 months	Campus Registration	2
College Transcripts from other institutions	Permanent	Academic	3

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
		Management	
Final Grade Roster	Permanent	Academic Management	3
Grade Change And Challenge Files	Permanent	Academic Management	3
Graduation Application	2 years	Campus Registration	2
Graduation Waiver and Substitution Form	Permanent	Campus Registration	2
Permission to Enroll	3 years	Campus Registration	2
Privacy Request	5 years	Campus Registration	2
Transcript Request Form	6 months	Campus Registration	2
Residency Appeal Form	5 years	Campus Registration	2
Drop/Add/Withdrawal/Vertical Change Form	5 years	Registration- Records	2
Medical Withdrawal Form	5 years	Campus Registration	2
Registration Form	3 years	Campus Registration	2
Waiver for Release of Student Information	5 years	Campus Registration	2
Admissions Applications	5 years from last active enrollment	Campus Admissions	2
Dual Admissions Application Form	5 years	Campus Registration	2
Application for Credit by Exam	5 years	Academic Deans Office	2
Disciplinary Records	5 years	Academic Deans Office or Dean of Student Dev	2
Suspension/Reinstatement letters	5 years	Academic Deans Office	2
High School Transcript	10 years from last active enrollment	Campus Admissions	2
Recruit Prospect Cards	None	Campus Admissions	2
Records on International Students (F-1 & M-1 Visas)	Permanent	Allegheny Admissions	3
Affidavit of Support	Permanent	Allegheny Admissions	3
F-1 Requirements Sheet	Permanent	Allegheny Admissions	3
International Admissions Files	Permanent	Allegheny Admissions	3
INS Form I-20	Permanent	Allegheny Admissions Office	3
GED Score Report/Diploma	5 years from last active enrollment	Campus Registration	2
TOEFL Score Report	Permanent	Campus Admissions	2
SAT Score Report	Permanent	Campus Admissions	2
CLEP/AP Exam Score Report	Permanent	Campus Registration	2
Veterans Records			
a. Veterans Application Document	3 years from last active enrollment	Military and Veterans Services	2
b. Proof of Eligibility	3 years from last active enrollment	Military and Veterans Services	2
c. Forms which show transfer to this College	3 years from last active enrollment	Military and Veterans Services	2
d. Veterans Benefits Request Form	3 years from last active enrollment	Military and Veterans Services	2
e. Certificate of Release or Discharge from Active Duty, DD214	3 years from last active enrollment	Military and Veterans Services	2
f. Application for VA Education Benefits, VA 22-1990	3 years from last active enrollment	Military and Veterans Services	2
g. Application for VA Education Benefits, VA 22-5490	3 years from last active enrollment	Military and Veterans Services	2
h. Military Orders	3 years from last active enrollment	Military and Veterans Services	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
WORKFORCE DEVELOPMENT AND CONTINUING EDUCATION			
Instructor Contracts	5 years	Workforce Division	2
Class Evaluations	5 years	Workforce Division	2
Daily and Overall Class Attendance Records	5 years	Workforce Division	2
Course Outlines	5 years	Workforce Division	2
Certificates of Completion	5 years	Workforce Division	2
Municipal Police Academy Transcripts	5 years	Workforce Division	2
Municipal Police Academy Records	7 years	Workforce Division	2
FINANCIAL AID			
Official accounts and supporting data	3 years after the close of the fiscal year in which the transaction took place or until notified of a Commonwealth audit of the account, whichever is later, but not more than 7 years	Financial Aid	2
a. Current records of the student's admission to and enrollment status at the institution, and his/her prior receipt of financial aid	7 years	Financial Aid	2
b. Financial and other records as necessary to determine "the institutional eligibility, financial responsibility and administrative capability" of the institution	5 years	Financial Aid	2
c. All records required under applicable program regulations	5 years	Financial Aid	2
d. Detailed financial records that are subject to review by the Depart. of Ed.	5 years except that records of questioned expenditures shall be maintained until final agreement is reached	Financial Aid	2
Financial Records - Annual Audit	5 years	Financial Aid	2
Specific Higher Education Assistance (HEA) Programs – Records relating to administration of the: - Federal Work Study (FWS) - FSEOG - Federal Pell Grant	5 years after the end of the grant for which the aid was awarded and disbursed	Financial Aid	2
FFEL, Direct Loan Program	5 years after the end of the award year for which the aid was awarded	Financial Aid	2
EMPLOYEE / HUMAN RESOURCE RECORDS			
Pre-Employment Records	3 years	Human Resources	2
a. Applications/resumes/interview notes: Not hired	2 years after hiring date for position	Human Resources	2
b. Applications/resumes/interview notes: Hired	3 years following separation	Human Resources	2
c. Background checks, driving records, employment verification, letters of reference: Not Hired	5 years after date of separation from employment / no hire	Human Resources (Exception: Driving Records- Security Dept.)	2
d. Background checks, driving records, employment verification, letters of reference: Hired	5 years after date of separation from employment	Human Resources (Exception: Driving Records- Security Dept.)	2
e. Job descriptions	2 years after position has been filled or remains active, whichever is later	Human Resources	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
f. Job announcements	2 years after position has been filled	Human Resources	2
EMPLOYEE RECORDS			
a. Personnel Records: Employee who separates with post-termination benefits (includes personnel history card, application for employment, references, resume, notification documents, photo identification records, health insurance and life insurance applications, I-9 forms, performance evaluations, commendations, training records, personal change forms, letter of resignation, retirement membership application, vacation and sick leave reports, salary review forms, separation report and correspondence.)	3 years after all benefits have been paid	Human Resources	2
b. Personnel Records: Employee who separates without post-termination benefits (includes personnel history card, application for employment, references, resume, notification documents, photo identification records, health insurance and life insurance applications, I-9 forms, performance evaluations, commendations, training records, personal change forms, letter of resignation, retirement membership application, vacation and sick leave reports, salary review forms, separation report and correspondence.)	5 years after separation from employment	Compensation & Job History- Human Resources Timekeeping Records: Business Offices, Human Resources & Financial Aid	2
c. Employee Card Files or Record Books- includes name, date of birth, social security number, job and salary history, benefit information, and termination data.	Permanent	Compensation & Job History- Human Resources Timekeeping Records: Business Offices, Human Resources & Financial Aid	2
d. FMLA/USERRA and related leave records	3 years after separation from employment	Human Resources	2
e. Disputed Issues: DOL, arbitration, court action	5 years after final resolution of dispute	Human Resources	2
f. Workers Compensation Claims	4 years after signing final settlement, or 4 years after death of recipient. If suspension agreement filed, retain 10 years	Risk Management	2
g. Union Grievances	3 years after final resolution	Human Resources	2
h. Labor Negotiations Files	5 years after expiration of contract	Human Resources	2
i. Labor Union Contracts	20 years after expiration	Human Resources	2
j. Equal Employment Opportunity Records	3 years for compliance reports and related records; 4 years after resolution of case	Human Resources	2
k. Investigatory records relating to alleged violations of Title VII or other employee complaints.	7 years Permanent (Cause Findings)	Human Resources	2
l. Employee Medical Records	Retain as long as employees' personnel records; however, if exposed to toxic substances or harmful physical agents in workplace retain at least 30 years after termination	Human Resources	2
m. Supervisor Notes and Documentation	Personal notes, memos or other records documenting verbal counseling or which are used in	Human Resources (Supervisor may retain copy for as	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
	connection with a performance evaluation or corrective action should be forwarded to HR and retained as part of employee's personnel records	long as there is need related to their supervision of subject employee)	
COMPLIANCE REPORTS/RECORDS			
Pennsylvania New Hire Report	3 years after report is filed	Human Resources	2
IPEDS & VETS-100 Reporting	5 years after report is filed	Human Resources	2
Affirmative Action Plan ("AAP") (if applicable)	5 years after close of AAP year	Human Resources	2
Federal/State tax report/filings	7 years after report is filed	Human Resources	2
Employee Statement of Financial Interests	Permanent	Human Resources	2
Uniform Crime Reporting – Federal and State	6 years	Emergency Management Director; Campus Security Office	1
Higher Education Gift Disclosure Report (PDE)	7 years	Foundation	2
Sexual Violence Education Report (PDE)	7 years	Civil Rights Compliance Officer	2
English Fluency in Higher Education	7 years	Human Resources	2
GRANTS			
Grant Records-Administrative-includes applications, proposals, objectives	Comply with retention requirements promulgated by the appropriate administering / funding / licensing agency.	Grants Office	2
Grant Records-Financial-includes grant awards, agreements, financial reports, federal evaluations, reimbursement request, quarterly, annual and final reports	10 years	Accounting	2
Grants to the Foundation	10 years	Foundation	2
PUBLIC SAFETY RECORDS			
Uniform Crime Reports (Pennsylvania & Federal)	6 years	Emergency Management Director; Campus Security Office	1
Annual Security Report	6 years	Emergency Management Director; Campus Security Office	1
Antihazing Report	5 years from date of publication	Emergency Management Director; Campus Security Office	1
Complaint dispatch report	Current & Previous Year	Emergency Management Director; Campus Security Office	2
Administrative Files	If routine, retain as long as of administrative value	Emergency Management Director; Campus Security Office	2
Key & Keycard Distribution	1 year	Emergency Management Director; Campus Security Office	2
Parking Sticker/Tag Applications	2 years	Emergency	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
		Management Director; Campus Security Office	
Vehicle Citations	4 years	Emergency Management Director; Campus Security Office	2
Surveillance Camera Recordings	30 days	Emergency Management Director; Campus Security Office	1
Records of Ticket Appeal Committee	4 years	Emergency Management Director; Campus Security Office	2
Surveillance Camera Recordings	30 days	Emergency Management Director; Campus Security Office	2
CIVIL RIGHTS / TITLE IX COMPLAINTS AND RELATED RECORDS			
RECORDS RELATING TO ALLEGED VIOLATIONS OF TITLE IX			
a. No Cause Findings	7 years	Civil Rights Compliance Officer	2
b. Cause Findings	Permanent	Civil Rights Compliance Officer	2
c. Investigatory Records and Notes	7 years after investigation concludes	Civil Rights Compliance Officer	2
Records of any remedial action taken pursuant to Title IX	7 years (No Cause Findings) Permanent (Cause Findings)	Civil Rights Compliance Officer	2
Investigatory records relating to alleged violations of Title VI and VII of the Civil Rights Act of 1964.	7 years (No Cause Findings) Permanent (Cause Findings)	Civil Rights Compliance Officer; Human Resources (employment-related)	2
General Title IX Compliance Records	3 years	Civil Rights Compliance Officer	2
Investigatory records relating to alleged violations of the Rehabilitation Act of 1973	3 years	Human Resources (Employment-related); Civil Rights Compliance Office (student-related)	2
ADA records, such as application forms submitted by applicants and other records related to hiring, requests for reasonable accommodation, promotion, demotion, transfer, lay-off or termination, rates of pay or other terms of compensation	2 years from date record made or personnel action taken, whichever is later; if record is relevant to charge or cause of action then hold until final disposition of charge or action	Human Resources (Employment-related); Civil Rights Compliance Office (student-related)	2
ACADEMIC PROGRAM / ACCREDITATION RECORDS			
Act 335 Forms- Community College Courses	Permanent	Registrar	1
Health Career Program Records	In compliance with specialized accreditation standards for individual career fields	Academic Dean for Program	2
Certificates of/Formal Records Documenting Accreditation Status	Permanent	President's Office and Academic Deans	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
		for Individually Accredited Programs	
Accreditation Records – Reports, Supporting Documentation and Related Correspondence	Duration of Accreditation Period plus 10 years, or any longer retention period mandated by applicable accrediting agency	Academic Dean for Program	2
PAYROLL RECORDS			
Federal Tax Records			
a. Undeliverable W-2 forms	7 years	Payroll	2
b. Employer's Quarterly Federal Tax Return (941) and schedules	7 years	Payroll	2
c. Wage and Tax Statement (W-2)	7 years	Payroll	2
d. Annual Withholding Tax Return for U.S. Source income of Foreign Persons (1042)	7 years	Payroll	2
e. Foreign Person(s) U.S. Source Income Subject to Withholding (1042S) Annual 6559	7 years	Payroll	2
State and Local Tax Records			
a. Quarterly returns and state and local taxes withheld	7 years	Payroll	2
b. Annual returns and detail	7 years	Payroll	2
c. Payment records and backup	7 years	Payroll	2
PA Dept. of Ed. FICA Receivables			
a. Quarterly returns (339) and detail	7 years	Payroll	2
b. Fiscal year reconciliation (2105)	7 years	Payroll	2
Employee Deduction Authorizations			
a. Savings Bond (obsolete 07/01/2010)	7 years	Payroll	2
b. United Way	7 years	Payroll	2
c. Foundation	7 years	Payroll	2
Garnishments			
a. Orders and related correspondence	7 years	Payroll	2
b. Payment records and backup	7 years	Payroll	2
Employee Time Keeping Records / Records of Hours Worked	7 years	Human Resources	2
Employee Payroll File			
a. Employee's W-4 Form	7 years after new certificate filed or terminated	Payroll	2
b. Direct Deposit Authorization	7 years after separation	Payroll	2
c. Union Dues Deduction Authorization	7 years after separation	Payroll	2
d. Credit Union Deduction Authorization	7 years after separation	Payroll	2
e. A-1 Payroll Payment Authorization	7 years after separation	Payroll	2
f. A-2 Payroll Payment Authorization	7 years after separation	Payroll	2
g. PSTD Screen Print Authorization	7 years after separation	Payroll	2
h. Federal Work Study Vouchers	7 years after separation	Payroll	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
i. Institutional Work Study Student Vouchers	7 years after separation	Payroll	2
j. Part-time Compensation Vouchers	7 years after separation	Payroll	2
k. Employee Payroll Adjustment Records- employee's name, social security number, and amounts withheld for federal and state taxes, insurance, bonds, and any other deductions.	7 years	Payroll	2
l. Social Security Reports- withholdings from employee's pay. Indicates name, reporting period, number of employees, names and social security numbers of employees, and wages paid and contributions to the fund.	7 years	Payroll	2
m. Payroll Voucher (Check) Registers- date, check number, employee's name, social security number, and department.	7 years	Payroll	2
n. Payroll Earnings and Deduction Registers- pay period reports	7 years	Payroll	2
o. Payroll Earnings and Deduction Registers- Year-to-Date Annual Summary - If payroll data is posted to individual employee's earnings records	7 years	Payroll	2
p. Payroll Earnings and Deduction Registers- Year-to-Date Annual Summary - If payroll data is not posted to individual employee's earnings records	50 years	Payroll	2
Other Payroll Payment Authorizations			
a. Overtime-Docking Report	3 years after separation	Payroll	2
b. Auto A-2	3 years after separation	Payroll	2
Other Employee Forms			
a. Foreign National Information Form	3 years	Payroll	2
b. Local Services Tax Exemption	2 years	Payroll	2
Other Payroll Forms			
a. Detail Payroll Register	Prior to 1999	Payroll	2
b. Employee Detail Paycheck History	Prior to 1999	Payroll	2
c. Student Social Security Tax Review Report	1 year	Payroll	2
d. Payroll Tax Summary Report	3 years	Payroll	2
e. Payroll General Ledger Detail	since 1999	Payroll	2
Unemployment Records			
a. Unemployment Tax & Contributions Records	7 years after contributions have been paid	Payroll	2
b. Unemployment Claim Records	7 years	Payroll	2
FACULTY/ACADEMIC AFFAIRS			
Faculty Grade Books (print and online)	End of academic term + 1 year	Faculty Member	2
Graded Exams and Assignments	End of academic term + 1 year	Faculty Member	2
Academic Complaints/Grade Challenges (Informal Phase)	One year after decision on request	Department Head	2
Academic Complaints and Hearing Board Files (Formal Phase)	5 years after final disposition	Academic Dean for Program	2
Grade Change Forms	Permanent	Registrar/Student File	2

RECORD DESCRIPTION	RETENTION PERIOD	CUSTODIAN	DISPOSAL CODE
Course Outline (Master)	Period in Use plus 1 year after revised, updated or discontinued	Department Head and Faculty Member	1
Course Syllabus	Period in Use plus 1 year	Department Head and Faculty Member	1
College Council Minutes and Materials	7 years	Council Chairperson, Committee Chairpersons	2
Teaching Portfolios	Duration of Employment	Faculty Member	2
Tenure and Promotion Applications and Supporting Materials	Duration of Employment plus five years	Human Resources	2
Sabbatical Applications and Supporting Materials	Duration of Employment	Provost's Office	2
Schedule/Overage Assignment Forms	End of academic term plus 1 year	Supervising Dean	2
Student Engagement/Activity Forms	End of academic term plus 1 year	Supervising Dean	2
Student Engagement Fund Applications	End of Fiscal Year plus 1 semester	Campus Business Office/Provost's Office	1
Classroom Observation Forms/Annual Evaluations	Duration of Employment plus 5 years	Human Resources	2
Academic Advising Records and Correspondence	5 years after date of graduation	Registration and Advisement Office	2
Attendance Records (Student)	End of academic term plus 1 year	Faculty Member	2
Class Audit Request/Approval Forms	5 years	Registration and Advisement Office	2
Credit by Exam Request/Approval Forms	5 years	Registration and Advisement Office	2
Class Schedules (Students)	5 years	Registration and Advisement Office	2
"P" Grade Request/Approval Forms and Related Materials	1 year after final disposition of grade	Academic Dean for Program	2
Course Catalogs	7 years	Provost's Office	2
Graduation Lists	7 years	Provost's Office	2
Commencement Programs and Materials	5 years (evaluate for permanent archive if deemed to have historical value)	President's Office	1
Academic Department Meeting Minutes and Agendas	3 years	Department Head	1

Community College of Allegheny County
LITIGATION HOLD ORDER FORM

Immediately acknowledge receipt of this order by signing the acknowledgment below and faxing or emailing it to the Office of General Counsel.

TO: Click here to enter text.
FROM: Click here to enter text.
SUBJECT: Preservation of Records and Documents
DATE: Click here to enter a date.

CCAC has received notice of Click here to enter text. , which alleges claims relating to Click here to enter text. “the Claims.” You are receiving this Hold Order because you may have records or documents in your possession that are relevant to this matter.

In accordance with law and College Policy, you are hereby notified that you are required to preserve all documents and records related to the Claims which are in your possession, custody or control. This Hold Order includes all documents and records that are stored or maintained in an electronic format, including records that are stored on the College’s computer systems, servers and networks; email accounts; data retrieval and/or backup systems; digital copiers; cell phones and other personal digital devices; computer hard drives, CD or DVD ROMS, memory sticks and all other electronic media or devices on which information may be stored electronically. The types of records which are subject to this Hold Order include, but are not limited to, the following:

1. Click here to enter text.
2. Click here to enter text..
3. Click here to enter text..

You are expressly and specifically instructed to preserve all such records, and not to alter, destroy, modify, erase, encrypt or otherwise make unavailable any such record within the scope of this Hold Order. You are further instructed that all such records are suspended from disposition and/or disposal under CCAC’s Record Retention Schedule, and SHALL NOT BE DESTROYED UNDER ANY CIRCUMSTANCES.

This Hold Order will remain in force until further written notice from this office or the College’s General Counsel.

Receipt Acknowledged by:

Signature

Print Name

Date