

The purpose of this policy is to promote the efficient management of records through understanding of the different types of records housed on campus, which ones should be maintained and for how long, which ones may be discarded, and the best method for discarding records. The Sarbanes-Oxley Act addresses the retention of business records and documents and the monitoring of a document destruction process. It is important for all personnel to know these policies to be in compliance.

This information is intended as a guideline for retention of records; it is not a comprehensive list of all types of records Mount Mercy might have. In addition, some individual records within a given category will have more significance than others, depending on the circumstances, and may warrant retention beyond the time period indicated below.

Legal Holds

From time to time the President or Board Chair may issue a notice, known as a “Legal Hold,” requiring the retention of records beyond the stated retention period due to pending, threatened or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. No records specified in any Legal Hold may be destroyed, even if the scheduled retention date has passed, until the Legal Hold is withdrawn in writing by the president or Board Chair

Mount Mercy University takes it very seriously its obligations to preserve information relating to litigation, audits, and investigations. It is a federal offense to destroy, alter or mutilate any record under federal investigation. The consequences of failing to retain items subject to a Legal Hold can be serious, including possible criminal and civil sanctions against Mount Mercy University and its employees, and possible disciplinary action against responsible individuals (up to and including termination of employment).

Each board member and each member has an obligation to contact the President or Board Chair immediately in the event the board member or employee obtains information relating to any potential or actual litigation, external audit, investigation, or similar proceeding or controversy involving Mount Mercy University. Questions about Legal Holds should be addressed to the President or Board Chair.

Documents and Minimal Retention Records Management Schedule

Last updated: March 1, 2019

Category of File	Record Owner/Office	Description of Document/Record	Retention	If required to keep, by what law
			Period	If recommended to keep, by what agency
Corporate Records				
	President's Office	Articles of Incorporation	Permanent	Common Practice, Higher Learning Commission
	President's Office	Bylaws	Permanent	Common Practice, Higher Learning Commission
	President's Office	Board meeting agendas & materials	7 years	Common Practice, Higher Learning Commission
	President's Office	Board and committee meeting minutes	Permanent	Common Practice, Higher Learning Commission
	President's Office	Board Conflict of Interest disclosure forms	7 years	Common Practice, Higher Learning Commission
	President's Office	Board files (info on individual board members including correspondence)	Permanent	Common Practice, Higher Learning Commission
	President's Office	Corporate Resolutions	Permanent	Common Practice, Higher Learning Commission
Finance & Administration				
	Business Office	Accounts payable ledger	7 years	Institutional Standard
	Business Office	Accounts receivable ledger	7 years	Institutional Standard
	Business Office	Auditor management letters	Permanent	Institutional Standard
	Business Office	Bank deposits & statements	7 years	Institutional Standard
	Business Office	Chart of accounts	7 years	Institutional Standard
	Business Office	Check register & checks	7 years	Institutional Standard
	Business Office	Contracts & agreements	Permanent	Institutional Standard
	Business Office	Correspondence – general	7 years	Institutional Standard
	Business Office	Equipment files & maintenance records	7 years after disposition	Institutional Standard

	Business Office	Expense reports	7 years	Institutional Standard
	Business Office	Financial statements (audited)	Permanent	Institutional Standard
	Business Office	IRS Form I-9 (store separate from personnel file)	Greater of 1 year after end of service, or 3 years	Institutional Standard
	Business Office	IRS Form 990	7 years	Institutional Standard
	Business Office	General ledgers & journals (includes bank reconciliations, fund accounting by month, payouts allocation, securities lending, single fund allocation, trust statements)	7 years	Institutional Standard
<u>Insurance files</u>				
	Business Office	Policies – occurrence type	Permanent	Institutional Standard
	Business Office	Policies – claims-made type	7 years	Institutional Standard
	Business Office	Accident reports	7 years	Institutional Standard
	Business Office	Fire inspection reports	7 years	Institutional Standard
	Business Office	Group disability records	7 years after end of benefits	Institutional Standard
	Business Office	Safety (OSHA) reports (if applicable)	Permanent	Institutional Standard
	Business Office	Claims (after settlement)	7 years	Institutional Standard
<u>Investments</u>				
	Business Office	Investment performance reports	7 years	Institutional Standard
	Business Office	Investment manager correspondence	7 years	Institutional Standard
	Business Office	Investment manager contracts	7 years after all obligations end	Institutional Standard
	Business Office	Investment consultant reports	7 years	Institutional Standard
	Business Office	Journal entries	7 years	Institutional Standard
	Business Office	Payroll records	Permanent	Institutional Standard
<u>Real estate</u>				
	Business Office	Deeds	Permanent	Institutional Standard
	Business Office	Leases (expired)	7 years after all obligations end	Institutional Standard
	Business Office	Mortgages, security agreements	7 years after all obligations end	Institutional Standard
	Business Office	Purchase agreements	7 years after disposition of property	Institutional Standard

<u>Tax</u>				
	Business Office	Correspondence with legal counsel or accountants, not otherwise listed	7 years after return is filed	Institutional Standard
<u>IRS exemption determination & related</u>				
	Business Office	Correspondence	Permanent	Institutional Standard
	Business Office	Tax audit closing letters	Permanent	Institutional Standard
	Business Office	Tax returns	Permanent	Institutional Standard
	Business Office	Timecards	3 years	Institutional Standard
	Business Office	Withholding tax statements	7 years	Institutional Standard
IPEDS Surveys				
	Institutional Research	IPEDS Institutional Characteristics	Permanent	Institutional History
	Institutional Research	IPEDS Completions	Permanent	Institutional History
	Institutional Research	IPEDS Human Resources	Permanent	Institutional History
	Institutional Research	IPEDS Finance	Permanent	Institutional History
	Institutional Research	IPEDS Financial Aid	Permanent	Institutional History
	Institutional Research	IPEDS Fall Enrollment	Permanent	Institutional History
	Institutional Research	IPEDS Graduation Rates	Permanent	Institutional History
Advancement				
	Development Office	Fund agreements (signed)	Permanent	Institutional Standard
	Development Office	Fund correspondence relating to terms of the fund	Permanent	Institutional Standard
	Development Office	Gift acknowledgments	7 years	Institutional Standard
	Development Office	Gift solicitations	7 years after final distribution of funds received in response to solicitation	Institutional Standard
	Development Office	Trust agreements	Permanent	Institutional Standard
	Development Office	Trust correspondence	Permanent	Institutional Standard
Communications				
	Communications and Marketing Office	Annual reports	Permanent (5 copies)	Institutional Standard

	Communications and Marketing Office	Other publications	Permanent (2 copies)	Institutional Standard
	Communications and Marketing Office	Photos	Permanent	Institutional Standard
	Communications and Marketing Office	Press clippings	Permanent	Institutional Standard
	Communications and Marketing Office	Press releases	Permanent	Institutional Standard
	Communications and Marketing Office	Research reports/surveys	5 years	Institutional Standard
	Communications and Marketing Office	Year-end reports	10 years	Institutional Standard
Program/ Grant Making				
	Development Office	Approved grants – all documentation supporting grant payment, including application/recommendation, due diligence, grant agreement letters, and grant transmittal letters.	7 years after completion of funded program, or date of grant if general operating support	Institutional Standard
	Development Office	Approved grants – post grant reporting information, outcome analysis.	Permanent	Institutional Standard
	Development Office	Records from grants committees, including minutes, if any and lists of grants recommended for approval.	7 years	Institutional Standard
	Development Office	Scholarship grant records, including applications if Mount Mercy University participates in selection decisions	7 years	Institutional Standard
	Development Office	Declined/withdrawn grant applications	3 years	Institutional Standard
	Development Office	Mount Mercy University funding requests (denied)	3 years	Institutional Standard
	Development Office	Mount Mercy University funding requests, correspondence and reports (funding received)	7 years after completion of program	Institutional Standard

Human Resources Office				
	Human Resources Office	Benefits: retirement plans (plan descriptions, plan documents)	6 years	Employee Retirement Income Security Act
	Human Resources Office	Consultant contracts/files (expired)	10 years after all obligations end	Per advice from legal counsel
	Human Resources Office	Contracts with employees	10 years after all obligations end	Discrimination in Employment Act (20 or more employees) Fair Labor Standards Act (1 or more employee) Equal Pay Act (1 or more employee) Lilly Ledbetter (1 or more employee) Family Medical Leave Act (50 or more employees)
	Human Resources Office	Disability & sick-benefit records	6 years after last payment	Discrimination in Employment Act (20 or more employees) Fair Labor Standards Act (1 or more employee) Equal Pay Act (1 or more employee) Lilly Ledbetter (1 or more employee) Family Medical Leave Act (50 or more employees)
	Human Resources Office	Employment applications	3 years	Age Discrimination in Employment Act (20 or more employees) Americans with Disabilities Act (15 or more employees) Civil Rights Act of 1964 (Title VII) (15 or more employees)

	Human Resources Office	Employee handbooks	3 years	FLSA
	Human Resources Office	Employee orientation & training materials	5 years	Goes in employee's personnel record, so it follows the record keeping of personnel files
	Human Resources Office	Employee personnel files	3 years	FLSA
	Human Resources Office	Time Reports/Allocation Records	3 years	Age Discrimination in Employment Act (20 or more employees) Fair Labor Standards Act (1 or more employee) Equal Pay Act (1 or more employee) Lilly Ledbetter (1 or more employee) Family Medical Leave Act (50 or more employees)
	Human Resources Office	I-9 Forms	3 years after hire or 1 year after termination, whichever is later	Immigration Reform and Control Act
	Human Resources Office	OSHA	5 years after injury, 30 years if it involves exams for blood borne pathogens	Occupational Health & Safety Act
	Human Resources Office	Resumes	3 years	Age Discrimination in Employment Act (20 or more employees) Americans with Disabilities Act (15 or more employees) Civil Rights Act of 1964 (Title VII) (15 or more employees)
	Human Resources Office	Workers Compensation	2 years from date of event or 3 years from last payment	Worker's compensation law
Whistleblower Policy	Human Resources Office	Complaints and/or reports	7 years	Institutional Standard

Technology				
	CIO Office	Software licenses & support agreements	7 years after all obligations end	Institutional Standard
Library				
	Library	Interlibrary loan requests for borrowed articles published within last 5 years	3 years	U.S. Copyright Act of 1976
	Library	Circulation transactions	1 week after the completion of the transaction	Interpretation of American Library Assn. Resolution on the Retention of Library Usage Records
Admissions Records				
Admissions Records for Applicants Who Do Not Enroll	Admission Office	All relevant Admissions correspondence, notice of admission, denial, waitlist	3 years after application	AACRAO
	Admission Office	Waivers of rights of access to admission letters of recommendation	Until terminated	AACRAO
	Registrar's Office	Applications for admission or re-admission	3 years after application	AACRAO
	Registrar's Office	Credit by Examination	3 years after graduation	AACRAO
	Admission Office	Entrance examination reports/test scores (ACT, SAT, TOEFL, etc.)	3 years after application	AACRAO
	Student Services	Medical records	3 years after application	AACRAO
	Registrar's Office	Letters of recommendation (admissions)	3 years after application	AACRAO
	Registrar's Office	Military documents	3 years after application	AACRAO
	Registrar's Office	Placement test scores/records	3 years after application	AACRAO
	Student Services	Residency classification forms	3 years after application	AACRAO
	Registrar's Office	High school and other college transcripts	3 years after application	AACRAO
Admissions Records for International Students Who Do Not Enroll	Admission Office	Alien Registration Receipt Card, DS-2019, Employment authorization (work permit), I-20, I-94 Card (copy), Passport number, statement of educational costs, statement of financial responsibility	3 years after application	AACRAO

Admissions Records for Applicants Who Enroll	Admission Office	All relevant Admissions correspondence, notice of admission, denial, waitlist	5 years after graduation or non-attendance	AACRAO
	Admission Office	Waivers of rights of access to admission letters of recommendation	Until terminated	AACRAO
	Admission Office	Applications for admission or re-admission	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Credit by Examination	5 years after graduation or non-attendance	AACRAO
	Admission Office	Entrance examination reports/test scores, placement test scores/records	5 years after graduation or non-attendance	AACRAO
	Student Services	Medical records	5 years after graduation or non-attendance	AACRAO
	Admission Office	Letters of recommendation	Until admitted	AACRAO
	Registrar's Office	Military documents	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Placement test scores/reports	5 years after graduation or non-attendance	AACRAO
	Student Services	Residency classification forms	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Test scores (other)	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	High school and other college transcripts	5 years after graduation or non-attendance	AACRAO
Admissions Records for International Students Who Enroll	Registrar's Office	Alien Registration Receipt Card, DS-2019, Employment authorization (work permit), I-20, I-94 Card (copy), Passport number, statement of educational costs, statement of financial responsibility	5 years after graduation or non-attendance	AACRAO
Student Academic Program Records				
	Academic Affairs	Academic Dismissal	5 years after graduation or non-attendance	AACRAO

	Academic Affairs	Academic integrity violations, academic probation	Permanent	AACRAO
	Academic Affairs	Disciplinary action records	5 years after graduation or non-attendance	AACRAO
	Academic Affairs	Grievance/complaint by student/grade appeal	3 years after closure	AACRAO
	Registrar's Office	Major changes, certification of 2 nd majors, minors	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Petitions (academic)	4 years	AACRAO
	Registrar's Office	Transcripts	Permanent	AACRAO
Degree Records	Registrar's Office	Application for degree or other credential	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Degree audit records	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Graduation lists	Permanent	AACRAO
	Registrar's Office	Substitution/waivers	5 years after graduation or non-attendance	AACRAO
Grade and Scholarship/Deficiency Records	Faculty Member	Grade book (faculty)	5 years after course completion	AACRAO
	Registrar's Office	Grade change forms	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Grade submission sheets/data	Permanent	AACRAO
Miscellaneous Student Records	Data Specialist Office	Name change authorizations	5 years after graduation or non-attendance	AACRAO
	Registrar's Office	Transfer credit evaluations	5 years after graduation or non-attendance	AACRAO
	Business Office	Tuition and fee charges	5 years after graduation or non-attendance	Institutional History
Registration and Enrollment Records	Registrar's Office	Class lists	Permanent	AACRAO
	Registrar's Office	Course repeat form/approval	1 year after date submitted	AACRAO
	Registrar's Office	Credit/no credit, audit, pass/no pass approvals	1 year after date submitted	AACRAO
	Registrar's Office	Enrollment changes	1 year after date submitted	AACRAO
	Registrar's Office	Hold or encumbrance authorizations	1 year after released	AACRAO

	Registrar's Office	Registration/enrollment records	1 year after date submitted	AACRAO
	Registrar's Office	Withdrawal/cancellation of enrollment records	5 years after graduation or non-attendance	AACRAO
Certification/Verification Records				
	Registrar's Office	Athlete eligibility reports	1 year after certification	AACRAO
	Sports Information Office	Athletic rosters, statistics	10 years	Institutional History
	Registrar's Office	Enrollment verifications	1 year after verification	AACRAO
	Registrar's Office	Teacher certifications	1 year after certification	AACRAO
	Registrar's Office	Transcript requests (student)	1 year after date submitted	AACRAO
	Registrar's Office	VA certification records	3 years after graduation or non-attendance	AACRAO
Student Record Electronic Data				
	CIO Office	Data change logs	10 years	Electronic records part of database
	CIO Office	E-mail data/information	Variable (until administrative needs satisfied)	Electronic records part of database
	CIO Office	Enrollment data	Permanent	Electronic records part of database
	CIO Office	Grade data	Permanent	Electronic records part of database
	CIO Office	Student demographic information	50 years	Electronic records part of database
Publications, Statistical Data/ Documents and Institutional Reports				
	Archivist Office	Catalogs	Permanent	Institutional History
	Archivist Office	Commencement programs	Permanent	Institutional History
	Registrar's Office	Schedules of classes	Permanent	Historical Data in SIS
FERPA Records	Registrar's Office	Requests for formal hearings	Permanent as long as record maintained	AACRAO
	Registrar's Office	Requests and disclosures of personally identifiable information	Permanent as long as disclosed record maintained	AACRAO

	Registrar's Office	Student requests for nondisclosure of directory information	Permanent or until terminated by student	AACRAO
	Registrar's Office	Student statements on content of records regarding hearing panel decisions	Permanent as long as the record is maintained	AACRAO
	Registrar's Office	Student's written consent for records disclosure	Permanent or until terminated by student	AACRAO
	Registrar's Office	Waivers for rights of access	Until terminated by student as long as record maintained	AACRAO
	Registrar's Office	Written decisions of hearing panels	Permanent as long as record is maintained	AACRAO
Federal Disclosure Records				
	Public Safety Office	Crime Statistics/Security Report	3 years from date of required disclosure	Federal - Department of Education
	Athletics	Athletic Participation/EADA documents	3 years from date of required disclosure	Federal - Department of Education
	Institutional Research	Student-Right-to-Know data	3 years from date of required disclosure	Federal - Department of Education
	Institutional Research	Institutional Information	3 years from date of required disclosure	Federal - Department of Education
	Education Division	Teacher Preparation Report	3 years from date of required disclosure	Department of Education
Federal Student Aid Records				
Federal Student Financial Aid (SFA) Program Records	Financial Aid Office	Accrediting and licensing agency review, approvals and reports - including program reviews	3 years from award year	Federal - Department of Education
	Financial Aid Office and Business Office	Audit reports and school responses	3 years from award year	Federal - Department of Education
	Financial Aid Office	Program participation agreement	3 years from award year	Federal - Department of Education

	Financial Aid Office and Business Office	Records pertaining to financial responsibility and standards of administrative capability	3 years from award year	Federal - Department of Education
	Financial Aid Office	Self-evaluation reports	3 years from award year	Federal - Department of Education
Federal Student Financial Aid (SFA) Fiscal Records	Financial Aid Office	Bank statements for accounts containing SFA funds	3 years from 3 years from award year	Federal - Department of Education
	Financial Aid Office	Federal work-study payroll records	3 years from award year	Federal - Department of Education
	Financial Aid Office	Ledgers identifying SFA transactions	3 years from award year	Federal - Department of Education
	Financial Aid Office	Records of SFA program transactions	3 years from award year	Federal - Department of Education
	Financial Aid Office	Records of student accounts	3 years from award year	Federal - Department of Education
	Financial Aid Office	Records supporting data on required reports, i.e. SFA program reconciliation reports, audit reports and school responses, Pell grant statements of accounts, accrediting and licensing agency reports	3 years from award year	Federal - Department of Education
Federal Student Financial Aid (SFA) Recipient Records	Financial Aid Office	Application data submitted to Dept of Ed or lender by the school on behalf of student	3 years from award year	Federal - Department of Education
	Financial Aid Office	Data used to establish student's admission, enrollment status and period of enrollment	3 years from award year	Federal - Department of Education
	Financial Aid Office	Date and amount of disbursements	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documentation of student's eligibility	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documentation of student's satisfactory academic progress	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documentation of student's program of study and courses enrolled in	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documentation related to the receipt of aid, such as amount of grant, loan FWS award; and calculations used to determine aid amounts	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documentation of initial or exit loan counseling	3 years from award year	Federal - Department of Education

	Financial Aid Office	Documentation supporting school's calculation of its completion/graduation or transfer-out rate	3 years from award year	Federal - Department of Education
	Financial Aid Office	Documents used to verify applicant's data	3 years from award year	Federal - Department of Education
	Financial Aid Office	Financial aid history for transfer students	3 years from award year	Federal - Department of Education
	Financial Aid Office	Reports and forms used for participation in the SFA program	3 years from award year	Federal - Department of Education
	Financial Aid Office	Student Aid Report (SAR) or Institutional Student Information Record (ISIR)	3 years from award year	Federal - Department of Education
Federal Student Financial Aid (SFA) Requirements for Specific Aid	Financial Aid Office	Borrowers eligibility records	3 years from end of award year or student's last attendance	Federal - Department of Education
	Financial Aid Office	Campus-based aid (Perkins loan, SEOG, Federal Work Study)	3 years from end of award year	Federal - Department of Education
	Financial Aid Office	Pell Grant	3 years from end of award year	Federal - Department of Education
	Financial Aid Office	FFEL and Direct Loans	Varies	Federal - Department of Education
	Financial Aid Office	Fiscal Operations Report (FISAP)	3 years from end of award year or of report submission	Federal - Department of Education
	Financial Aid Office	Perkins repayment records	3 years from date loan assigned, cancelled or repaid	Federal - Department of Education
	Financial Aid Office	Perkins original promissory notes	Until loan is satisfied or documents are needed to enforce obligation	Federal - Department of Education
	Financial Aid Office	All other records	3 years from award year or of report submission	Federal - Department of Education
Academic Divisions/Department Records				
	Archivist Office	Course syllabi	5 years from date last offered by department	Industry standard

	Faculty Member or Division/Department Chair	Graded coursework	1 year	AACRAO
	Academic Affairs	Faculty course evaluations completed by students	7 years	Faculty Promotion Schedule
	Faculty Member or Division/Department Chair	Academic advising plans, notes.	3 years after graduation or non-attendance	AACRAO
	Faculty Member or Division/Department Chair	Correspondence between student and faculty member regarding student issues	3 years after graduation or non-attendance	AACRAO
	Registrar's Office	Schedule of class forms – used by departments during schedule development	1 year	AACRAO
IRB Board				
	IRB Office	Application Materials	3 years	Federal Law - 45 CFR 46, Dept of Health and HS
	IRB Office	Approvals or Denials	3 years	Federal Law - 45 CFR 46, Dept of Health and HS
	IRB Office	Memberships/Renewals	3 years	Federal Law - 45 CFR 46, Dept of Health and HS
	IRB Office	Correspondence with Applicants	3 years	Federal Law - 45 CFR 46, Dept of Health and HS
Counseling Services and Olson MFT Clinic				
	Counseling Services and Olson MFT Clinic Offices	Paper or electronic student counseling files	7 years from date of last contact	state and federal law requirements
Public Safety				
	Public Safety Office	Annual Security Report (Clery Act)	7 years	Clery Act - federal law
Health Services				
	Health Services Office	Paper or electronic student counseling files	7 years from date of last contact	state and federal law requirements
Facilities				
	Facilities Office	Bloodborne Pathogen Training		OSHA, proof of training
	Facilities Office	MSDS documents	Permanently while using product	Industry standard

Periodic Destruction

Documents from the proceeding list will periodically be destroyed after the retention period has expired. Each listed office or party will be responsible to follow the schedule above. Updates to the above schedule should be directed to the Institutional Research Office.

Unnecessary Documents

Those documents whose continued preservation serves no useful purpose and may in fact expose Mount Mercy University to storage costs shall be promptly and systematically deleted and destroyed by the employee or department who generated them. These include, but are not limited to, personal e-mails and correspondence unrelated to Mount Mercy University matters; preliminary drafts of letters and memoranda if a final version has been retained; brochures and newsletters received by Mount Mercy University unrelated to its activities; and any “junk mail” received by Mount Mercy University. However, any of the above documents relevant to or discoverable in pending or potential litigation and other legal and official proceedings shall be retained.

Electronic Records

This policy applies to any electronic records. Employees may determine whether a document should be held in paper or electronic format, if it exists in both. Either the paper version should be destroyed and the electronic version maintained for the time requirements of this policy, or the electronic version deleted and the paper version maintained for the time requirements of this policy. Duplication of records in both electronic and paper format is necessary and cumbersome.

If an employee has performed Mount Mercy University related work at home, any records or documents held on an employee’s personal equipment should be transferred at the earliest possible time to a Mount Mercy University owned equipment and deleted from the employee’s personal equipment. This ensures that the document will be maintained under this policy.

E-mail correspondence which may identified as falling under one of the protected types of documents addressed in this policy should be saved either by printing a paper copy for filing or saving an electronic copy of the same for the period specified in the policy. E-mail correspondence which does not directly fall under one of these categories may be kept as long as the employee believes it is necessary.

Electronic records will be backed-up on a regular basis.

Training

University employees responsible for records noted above will be trained in storage, maintenance and destruction of records.

Adherence

All offices involved in the maintenance of records must adhere to the document retention and destruction policy.

Approved January 2010, revised March, 2019.