

Bryn Mawr College Records Management Policy

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I. Introduction

As technology allows for the creation of even more records, it is important for College employees to understand their role in the creation and disposition—through destruction or archiving—of records so we can both meet legal and fiscal recordkeeping requirements and ensure the preservation of records with enduring historical or administrative value. The Bryn Mawr College Archives acts as the final repository for the historical analog and digital records of Bryn Mawr from its founding in 1885 to the present day, as well as provides leadership and expertise in critical engagement with Bryn Mawr history and the management of the College's records in all formats.

a. What is Records Management?

Records management is the systematic control of records throughout their life cycle, from creation to disposition by destruction or archiving. Through the control of records, the College is able to obtain information about important departmental business activities while disposing of materials and information that are no longer needed.

Records exist in many forms and are defined by their content, not format, and can be paper, electronic, audio/visual, or any other method of recording and retrieving information.

b. Good Records Management Practices

College departments and offices have the responsibility to ensure their employees are practicing good records management. The basic components of good records management practices are:

- Ensuring that employees are creating records that fully and accurately document their core activities
- Managing and storing departmental and office records in a manner that facilitates timely and accurate retrieval
- Ensuring that records are stored in authorized, secure locations and in safe, stable environments
- Allowing only those employees with the proper authority to access records and information systems
- Carrying out the proper disposition of their records (i.e., knowing how long to retain records and what to do with records when they're no longer actively used)
- Complying with laws, regulations, standards, and professional ethics that affect the management of departmental and office records

II. Records Transfer & Selection

Records produced by the offices and departments of Bryn Mawr College may only be transferred to the College Archives once those records are past their period of active use. Office and departmental records that have been transferred to the College Archives cannot be recalled, and are subject to the same terms of use and reproduction as other collections stewarded by the Bryn Mawr College Archives and Special Collections. Additionally, materials noted as permanent in the Record Retention Policy may be the sole responsibility of the office of origin rather than housed in the College Archives.

The College Archives will not accept significantly duplicated materials. It will be the prerogative of the College Archivist or the Director of Special Collections to de-select materials deemed no longer appropriate within these guidelines and the department's Collection Development Policy. Records transferred to the College Archives that do not fit its mission will be disposed of.

a. How do we transfer records to the College Archives?

Departments that wish to transfer records to the College Archives should contact the College Archivist via email or phone to discuss the transfer of records to the College Archives.

Following the Records Management Policy, not all permanent records will be transferred to the College Archives. Only records listed in section C of the Retention Schedule will be transferred to the archives. These records will only be transferred when they are no longer in active use.

After the College Archives are notified, the archivist will prepare for the impending transfer. Departments can obtain suitable file boxes from the College Archives. Transferred files should be accompanied by a typed inventory of files contained in each box. Departments should retain a copy for office reference. Schedule a file box pick up with Facilities to move the box or boxes from your department to the College Archives.

b. What about records not listed in the Retention Schedule?

Some records not listed on the Retention Schedule may be important to preserve because of their potential historical value. If your department has records you think may fall into this category, please contact the College Archivist to arrange a meeting.

Examples of records not listed in the retention schedule which the archives might be interested in:

- All publications, newsletters, booklets, memoranda, and other media distributed in the name of Bryn Mawr College including, but not limited to: catalogs, calendars, bulletins, yearbooks, student publications, faculty/staff/administration newsletters, alumnae/-i publications, and major websites of the College
- Photographic prints, negatives, slide, film, tapes, reels, oral history interviews, and other media (including digital) documenting the College.
- Documentation of student life at Bryn Mawr College, especially those which reflect the diversity of histories of the College, and of student organizations
- Documentation of significant events and celebrations
- Maps, prints, and architectural renderings that depict the development of the College
- Artifacts relating to the history of Bryn Mawr College

III. Retention & Disposal

Records shall be retained only during their period of use, unless longer retention is required as reflected below, or the records are needed for departmental reference or for historical/archival reasons. Records which are no longer needed for ongoing departmental business or as reflected below shall be systematically and regularly destroyed or discarded according to disposal guidelines (Section V). Please note that this retention schedule is superseded by any document preservation notice issued in connection with a litigation hold, as laid out below in Section III (d).

Questions about the implementation of the record retention schedule should be addressed to the College Archivist.

Alumnae/i Relations and Development Records

Type of Record	Retention Period
Alumnae Association Biofiles (deceased alumnae/i)	Permanent; transferred to the College Archives
Donor Files	3 years after death of donor

College Administrative and Departmental Records

Type of Record	Retention Period
Accreditation Records	Permanent
Appointment Books, Office Logs, etc.	2 years or at departmental discretion
Bylaws, Charters, Minute Books	Permanent; housed with originating department unless otherwise indicated elsewhere
Campaign Records and Sample Materials	Permanent; transfer to College Archives upon completion of campaign
Correspondence (general)	2 years or at departmental discretion
Correspondence (relating to contract, copyright, patent, or an official document)	Life of the principal document
Correspondence (which may be needed in court to disprove liability or affirm the rights of the College)	Applicable Statute of Limitations
Faculty Meeting Minutes	Permanent; transfer to College Archives after 4 years
Grant Files and Documentation ¹	7 years after filing of final reports

¹ These records include financial and programmatic files relates to grants, and are kept according to federal grant requirements under Uniform Guidance OMB 2 CFR 200, Subpart D 200.334. This retention period also applies to

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Librarian’s Office/Office of the CIO Files	Permanent; transfer to archives after 2 years
Minutes of the Board of Trustees	Permanent; transfer copy to the College Archives
President’s Office Files	Permanent; transfer to the College Archives after 2 years
Provost’s Office Faculty Files	Permanent; transfer to the College Archives when inactive

Human Resources

Type of Record	Retention Period
Background Check Records	6 years after date of report
EEO-1 Reports	2 years from filing
Employee Benefit Participant Records ²	Permanent
Employee Benefit Plan Documents ³	Life of the plan plus 6 years
Employee Medical and Exposure Records (related to hazardous material exposure) – Not including Noise	Duration of Employment + 30 Years
Employee Exposure Records – Noise OSHA 1910.95(m)(3)(i)	Measurement Records - end of calendar year in which exposure documented + 2 years Audiometric Testing – duration of affected employee’s employment
Employment Contracts	6 years after termination of contract; permanently if no termination date (e.g., release agreement)
FMLA/Leave Records ⁴	4 years after completion of leave/denial of request for leave

IRB and IACUC records. These requirements only apply to successful grant applications; unsuccessful grant documentation do not need to be retained for record keeping purposes.

² Employee Benefit Participant Records include beneficiary, distribution, enrollment, investment forms and investment statements with a participant’s account balance and activity, census data and support for such information including records that are used to determine eligibility, vesting, and calculated benefits, support and documentation relating to plan loans, withdrawals and distributions.

³ Employee Benefit Plan Documents include basic plan documents, adoption agreements, amendments, summary plan descriptions, summary of material modifications, most recent IRS Determination Letter, employee communications, Trust Documents, board or administrative committee minutes and resolutions.

⁴ These records include basic payroll and identifying employee data, including name, address, and occupation; rate or basis of pay and terms of compensation; daily and weekly hours worked per pay period; additions to or deductions from wages; and total compensation paid, as well as dates/hours FMLA leave is taken by FMLA eligible employees (e.g., available from time records, requests for leave, etc., if so designated); copies of employee notices of leave furnished to the employer under FMLA, if in writing, and copies of all written notices given to employees

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I-9 Forms	The later of: (a) 3 years after date of hire, or (b) 1 year after employee is terminated
Injury and Illness Incident Reports and Related OSHA Forms/Logs	6 years following the end of the calendar year the records cover
Payroll/Wage Records ⁵	4 years
Pension Plan/Retirement Records	Until all payments are made
Personnel Files ⁶	Duration of employment plus 7 years
Recruitment and Search Records ⁷	5 years from date job search closed
Workers' Compensation Records	Duration of benefits period + 4 years
Workplace Injury Records	4 years from date of injury

Facilities, Environmental, and Equipment Records

Type of Record	Retention Period
Asbestos Records (abatement, claims, etc.)	30 years
Building plans and specifications	Life of building; transfer to archives after building destruction
Fire, Internal Disaster, and Evacuation Plans	4 years
Hazardous or Toxic Waste Disposal or Abatement Records (manifest, etc.)	30 years
Insurance Policies	Duration of policy + 25 years
Inventories of Hazardous and/or Toxic Chemicals	Current only
Maintenance Records (real property, vehicles)	4 years

as required under FMLA; documents (including written and electronic records) describing employee benefits or employer policies and practices regarding the taking of paid and unpaid leaves; premium payments of employee benefits; and records of any dispute between the employer and an employee regarding designation of leave as FMLA leave, including any written statement from the employer or employee of the reasons for the designation and for the disagreement.

⁵ These records include basic employment and earnings records including all timecards, deductions/additions from wages paid, employee names, addresses, birth dates, sex, work schedule, regular hourly rate of pay, hours worked, overtime rate of pay, overtime hours worked.

⁶ Some documents identified on this schedule may be stored in an employee personnel file. Records in personnel files may also include: requests for reasonable accommodation, application forms submitted by applicants and other records having to do with hiring, promotion, demotion, transfer, lay-off or termination, rates of pay or other terms of compensation, selection for training or apprenticeship, attendance, discipline, and performance evaluations

⁷ If the individual is hired, these documents should be moved to the personnel file. Recruitment Records include applications, resumes, job postings, offer letters, and pre-employment tests.

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Material hoists, personnel hoists, and elevator standards and certification records	4 years
Material Safety Data Sheets (MSDS)	30 years
Mechanical and Electrical Equipment Check Records	4 years
Operational manuals	Life of building
Records of Fire Department Inspections	4 years
Records of Required Testing of Fire Protection and Other Safety Equipment	4 years
EHS Program documentation – Internal EHS program documents, policies, procedures, guidelines	Until superseded or outdated + 1 year
Employee Training Records and Sign-in Sheets	End of calendar year in which course ends or separation of employment + 30 years
Environmental Health and Safety Inspections and Audits	End of calendar year which audit was completed +7 years
Environmental Spill and Emergency Plans 25 Pa. Code 262a. 100	Until superseded or outdated +5years
Equipment Calibration and Testing Records – Non-Radioactive	Decommissioning of equipment + 30 years
Equipment Calibration, Testing Records, and Equipment Inventories –Radioactive	Expiration of license + 3 years
Equipment Testing Records (eyewash and showers)	Life of process + 3 years
Federal and State Special Forms of Permits, Approvals, and Registrations and Submissions 25 PA Section 270a.60(a)(1), 40 CFR 264.74, 49 CFR 107.705, 49 CFR 173.185	Expiration of permit + 3 years
Hazardous, Infectious, and Radioactive Waste – Shipping and Disposal Records	Permanent
Hazardous Materials – Shipping & Receiving Records 40 CFR Section 262.40; Section 101 ESIGN Act	End of calendar year + 3 years
Radioactive License and Amendment Records, Radioactive Material Surveys, and Radioactive Material Records U.S. NRC 36.81	Expiration of License + 3 years
Chemical waste area and pesticide storage area inspections PA Department of Ag (PDA) Pesticide and Regulations 7 Pa. Code, Chapter 128 Sections 35 and 6	End of calendar year + 3 years

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Equipment and confined space inventories	Until superseded
Pesticide Application Records PA Department of Ag (PDA) Pesticide and Regulations 7 Pa. Code, Chapter 128 Sections 35 and 6	Date of application + 3 years
Refrigerant records and Refrigerant Technician Certification 40 CFR Part 82, Subpart F §82.154	End of calendar year + 3 years

Finance

Type of Record	Retention Period
Accounts Payable	Current year plus 7 years
Accounts Receivable	7 years from the receipt of payment/write-off
Annuity Gift Agreement (expired)	Current year plus 7 years
Audit Work Papers	Conclusion of audit plus 7 years
Bank Records	Current year plus 7 years
Budget Records (departmental)	Current year plus 7 years
Bills (paid) (departmental copies)	Current year plus 7 years
Bequests	Permanent
Cash Receipts and Disbursements	Current year plus 7 years
Checks	Current year plus 7 years
Credit Card Records	Current year plus 7 years
Deeds and Titles	Permanent
Deposit Slips	Current year plus 7 years
Endowment Records	Permanent
Gifts to the College	Current year plus 7 years
Gifts to the Library	Permanent
Mortgages, Leases, Notes (expired)	Current year plus 7 years
Purchase Orders	Current year plus 7 years
Sales Records	Current year plus 7 years
Stock Transactions	Current year plus 7 years
Tax Records/Corporate	Permanent
Tax Records/Employee (federal)	Current year plus 7 years
Tax Records/Employee (state)	Current year plus 7 years

Academic/Student Records

Type of Record	Retention Period
Academic Dismissal	Permanent; transfer to the College Archives 5 years after date of last attendance

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Academic Records (narrative evaluations, competency assessments, other miscellaneous)	Permanent if required to be part of transcript; transfer to the College Archives 5 years after graduation or date of last attendance
Career & Civic Engagement Center Student Credential Files	Current year plus 7 years
Commencement Programs	Permanent
Course Catalogs/Calendars	Permanent; obtained annually by College Archives
Grade Submission Sheets/Data	Permanent; transfer to the College Archives 5 years after graduation or date of last attendance
Graduation Lists	Permanent
Honor Board Files	Permanent; transfer to the College Archives 5 years after final decision
Financial Aid Student Files	2 or 3 years from date of graduation or last attendance
International Student Forms (I-20)	5 years from graduation or date of last attendance
Student Academic Files (Departmental)	5 years from graduation or date of last attendance
Student Medical Records	7 years from date of graduation or last attendance
Student Transcripts (Registrar's Office)	Permanent; transfer to the College Archives 5 years after graduation or date of last attendance

a. Litigation Hold Policy

If a legal claim is reasonably anticipated or is filed, or a lawsuit begun, the affected offices should immediately contact the College Counsel. The College Counsel will notify the appropriate senior administrators, as applicable, of such pending or threatened litigation, and will issue a litigation hold directive which will override any records retention schedule that may have otherwise called for the transfer, disposal or destruction of relevant documents.

IV. Confidentiality & Privacy

The Bryn Mawr College Archives recognizes the rights of faculty, students, alumnae/-i, and other donors to impose reasonable restrictions to protect privacy. Records that contain sensitive personal information or other forms of protected information are restricted as outlined below:

- Student educational records (including grades and letters of recommendation) are governed by the Family Educational Rights and Privacy Act (FERPA) of 1974, as amended, and are restricted for seventy-five years from the date of creation.
- Personnel records relating to Bryn Mawr faculty and staff (including search, review, promotion, tenure, and disciplinary/grievance records) are restricted for seventy-five years from the date of creation.
- Records of the Board of Trustees and its committees (including meeting minutes and correspondence) are restricted for twenty-five years from the date of creation.
- Records of the President's Office are restricted for twenty-five years from the date of creation.
- Financial records and records relating to donors and donations are closed for twenty-five years from the date of creation.
- Medical records, patient/client files, and any sensitive, personally identifiable information (including social security numbers, bank account numbers, and credit card numbers) are permanently restricted and may be marked for deaccession or redaction at the discretion of the College Archivist or in compliance with Bryn Mawr College's Data Handling Policies.

Records of the above types, even where located in otherwise unrestricted collections, are still considered closed following the same policies.

V. Disposal Guidelines

Records that have reached the end of their use period according to the Retention Schedule and are not subject to a hold for legal or audit purposes should be destroyed in a timely manner, according to disposal guidelines.

To dispose of records listed on the retention schedule, offices and departments should:

- Calculate the retention period of the record and ensure it is at its end of life and out of active use within the department
- Document the date and types of records that were destroyed and send this information to the College Archivist
- Ensure that records which contain confidential information, personally identifiable information, or any information covered by FERPA is securely destroyed by shredding, confidential recycling, or secure electronic destruction

Anticipated or current litigation, audit, government investigation, or other similar matters will suspend the normal disposition of records.

If you have any questions about records disposal, please contact the College Archivist.

I. Glossary

Definitions taken from the Society of American Archivists⁸ and National Archives and Records Administration⁹ glossaries.

Active record: Records that continue to be used with sufficient frequency to justify keeping them in the office of creation.

Archival record: Materials created or received by a person, family, or organization, public or private, in the conduct of their affairs that are preserved because of the enduring value contained in the information they contain or as evidence of the functions and responsibilities of their creator.

College Archives: The unit within Bryn Mawr College's Special Collections Department responsible for maintaining the College's records of enduring value.

Disposal: The action taken regarding temporary records after their retention periods expire, and consisting usually of destruction/deletion.

Family Education Rights and Privacy Act: Also *FERPA* or the *Buckley Amendment*. The Act provides students with the right to inspect and review their education records; insures that in most instances the contents of education records may not be disclosed without the student's consent; and permits students to request the modification of inaccurate or otherwise inappropriate education records.

Fiscal Value: The usefulness or significance of records containing financial information that is necessary to conduct current or future business or that serves as evidence of financial transactions.

Historical Value: The usefulness or significance of records for understanding the past, based on the administrative, legal, fiscal, evidential, or historical information they contain, justifying their continued preservation.

Inactive Record: Records that are no longer used in the day-to-day course of business, but that may be preserved and occasionally used for legal, historical, or operational purposes.

Legal Value: The usefulness or significance of records to document and protect the rights and interests of an individual or organization, to provide for defense in litigation, to demonstrate compliance with laws and regulations, or to meet other legal needs.

Record: A written or printed work of a legal or official nature that may be used as evidence or proof; a document.

Records management: The systematic and administrative control of records throughout their life cycle to ensure efficiency and economy in their creation, use, handling, control, maintenance, and disposition.

Retention schedule: A document that identifies and describes an organization's records, providing guidance for the disposition of records throughout their life cycle.

Retrieval: The process of locating material or information in storage and returning it for use.

⁸ <https://www2.archivists.org/glossary>

⁹ <https://www.archives.gov/files/records-mgmt/rm-glossary-of-terms.pdf>

Selection: The process of identifying materials to be preserved because of their enduring value, especially those materials to be physically transferred to an archives.

Transfer: The process of moving records as part of their scheduled disposition, especially from an office to an archives.