

Records Retention Policy (Student Affairs)

Purpose

The Dean of Student Affairs is responsible for developing and implementing policies governing the retention and disposal of the University's records among student service departments, including: Counseling & Consultation Center, Health Services, Career & Graduate Development Center, Religious Life, Residence Life, and Campus Life & the First Year Experience. The Dean of Student Affairs also serves as the chief conduct officer for Huston-Tillotson University (HT) and is responsible for administering the *Code of Conduct and Community Standards* as well as maintenance, retention, and disposal of conduct records.

Process

The Dean of Student Affairs will designate representatives in student service departments to assist in implementing a record retention policy, including the following:

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

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

Each department will periodically review the policy to determine any special circumstances that necessitate changes in the retention periods. Requests for changes in retention periods or deviations from specified retention periods should be made in writing to the Dean of Student Affairs, and may be implemented only after approval by the Provost and Vice President for Academic and Student Affairs as well as legal counsel. All paper records are to be shredded once the period of retention has expired except in

cases of a governmental audit, investigation, or pending litigation. This disposal may be performed by approved University staff or a third party vendor.

In the event of a governmental audit, investigation, or pending litigation, record disposal may be suspended at the direction of the Dean of Student Affairs. In addition, the Dean of Student Affairs should be informed of any situation that might give rise to legal action as soon as the situation becomes apparent.

Applicability

This policy applies to all records generated in the course of the university's operations among student service departments, including both original documents and reproductions. It also applies to records stored on computer, microform, as well as paper records.

Retention Schedule

ACT = while active, employed, or enrolled
 LIFE = life of affected employee
 PERM = permanent

Document	Retention Period
STUDENT AFFAIRS	
CAMPUS LIFE & FIRST YEAR EXPERIENCE	
Committee Files	10 years
Conduct Records (Student Organizations - Suspension)	PERM
Conduct Records (Student orgs - All others).....	5 years
Student Advising Files	ACT + 4 years
Student Organization Budgets	ACT + 4 years
Student Organization Constitutions	ACT + 6 years
Program Files	10 years
Letters of Recommendation	PERM
Student Publications (1 copy).....	PERM
Orientation Guides (1 copy).....	10 years
Publications.....	10 years
Event Forms	ACT + 1 year
CAREER & GRADUATE DEVELOPMENT	
Annual Report to Dean	5 years
Graduate Survey Records	PERM
Letters of Recommendation	PERM
Student Career Planning Records	ACT + 10 years
Student Employment Records.....	ACT + ? years
Career Planning Records.....	ACT + 10 years
Teacher Credential Records (prior to 1997).....	PERM
COUNSELING & CONSULTATION CENTER	
Counseling Records	ACT + 10 years
(as required by Rules & Regulations of the Texas State Board of Examiners of Psychologist)	
Disability Records.....	ACT + ? years

DEAN OF STUDENT AFFAIRS

Conduct Records (Suspension/Expulsion).....	PERM
Conduct Records (All others).....	ACT + 5 years
Student Files.....	ACT + 4 years

HEALTH SERVICES

Health Records.....	ACT + 7 years
Vaccination Records (other than flu vaccines).....	PERM

INTRAMURAL ACTIVITIES

Accident Reports.....	6 years
Participant Liability Waivers.....	6 years
Disciplinary Files.....	ACT
Committee Files.....	5 years
Program Files.....	5 years

RESIDENCE LIFE

Conduct Records.....	ACT + 10 years
Housing Applications.....	ACT + 4 years
Room Inventory Forms.....	ACT + ? years
Student Files.....	ACT

UNIVERSITY CHAPLAIN & RELIGIOUS LIFE

Chapel Bulletins.....	PERM
Program Files.....	4 years
Student Files.....	ACT

Confidentiality

The right of access to information in a student’s educational records is governed by federal law known as the Family Educational Rights and Privacy Act (FERPA). The right of access to other information, such as medical or counseling records, is governed by applicable state and federal laws. As a general rule, students attending a college or university, regardless of age, have a right under FERPA to control disclosure of information from their educational records. In cases where a student may be a danger to himself/herself and/or others, the University may notify a parent or legal guardian. Students, parents, and guardians are notified about FERPA at New Student Orientation and an explanation about FERPA is included on the HT website and in the Student Handbook which is available on-line. Student organizational conduct action is not covered by FERPA.

A variety of methods are used to ensure the confidentiality of students’ (paper) educational records including: keeping all sensitive and confidential information in locked file cabinets; locking computers when not in use and entering passcodes upon return; utilizing computer monitor privacy screens in high traffic areas; and following a clean desk policy. The clean desk policy refers to all staff securing confidential and other sensitive information in locked file cabinets or desks (when the item is currently in use). No confidential information is to be kept on desks when the staff member is not present.

In addition, the University employs the following strategies to insure the confidentiality of electronic records....

Release

In general, students' educational records are not released without written permission from the student. Below are the policies regarding certain types of records and its release.

Advising

Student advising files (paper and electronic formats) are kept by the Coordinator of the First Year Experience for first-year students and all PASS Program participants. Additional advising files are kept by the Coordinator of Advising and Supplemental Instruction as well as individual faculty advisors. Student advising files may include, but are not limited to: admissions materials such as transcripts and standardized test scores; placement test scores; progress and grade reports. Student advising files are the property of HT and are not released except as permitted by law.

Conduct

All student and student organizational conduct records (paper and electronic formats) that involve matters resolved by the Division of Student Affairs are kept in the Office of the Dean of Student Affairs. The Director of Campus Life & FYE will also have a copy of student organizational conduct files. Conduct matters that result in suspension and/or expulsion from the University are kept permanently. All other disciplinary files are destroyed five years after the student is no longer an active student or has graduated. For matters resulting in conduct action less than suspension, student organizational conduct records are kept for five years.

Disclosures to External Third Parties

Conduct matters that result in suspension and/or expulsion will be reported to external third parties, as required or permitted by law. Conduct records will only be released to external third parties as required by law.

Statement to External Third Parties

Student conduct files (paper and electronic formats) are maintained by the Office of the Dean of Student Affairs. Conduct matters that result in suspension and/or expulsion from the University are kept permanently. For matters resulting in conduct action less than suspension, records are kept five years after the student is no longer an active student or has graduated.

Career

Counseling

Disability

Health

Storage

Students' conduct, health, counseling, and other academic paper records are stored in fire proof, locked file cabinets. All paper records are kept in locked cabinets.

HT Information Technology or a third party vendor periodically convert paper documents into electronic records using copiers and scanners. Records are backed up...

What about electronic records?

Are we going to hire a vendor? i.e. Iron Mountain Company Will they address conversion, back-up, and disposal?