

## COLLEGE OF ENGINEERING Guidelines for Record Retention

This document is a companion to the University's Records Policy and Procedures Manual (available on the web at <http://bentley.umich.edu/uarphome/manual/index.php>) and is intended to guide departments in the development of department-specific policies and procedures regarding record retention. Included are references to relevant state and federal laws, University and College policies, and recommendations for consideration in each of the following areas:

- Financial
- Student
- Human Resources
- Governance
- Grievances
- Facilities & Safety

### **Over-Arching Guidelines**

**Avoid redundancy** – In general, the storing of redundant information should be avoided. In many cases, the central offices have primary responsibility for retaining records. In cases where departments are storing centrally-maintained information beyond the limits set forth in the other sections of this document, departments are encouraged to weigh the value of easy access to the information vs. the cost of storage.

**Freedom of Information Act** – Because University records are subject to disclosure, it is a good practice to be mindful of potential public dissemination when deciding whether a document needs to be retained.

**Historic Value** – Contact the Bentley Historical Library before destroying materials that are not available through a central office to receive an assessment of whether the documents have potential historic value.

**Internal Consistency** – Review practices to ensure that the same retention rules apply to like activities. Purge files on a timely basis to avoid erroneous interpretations of record retention policies.

**Primary Responsibility** – Avoid retaining draft or outdated copies of documents for which the primary responsibility lies within another unit.

### **Imaging**

Refer to the University Records Policy and Procedures Manual <http://bentley.umich.edu/uarphome/manual/docs/manual.pdf> for guidelines on managing and preserving records in digital form.

### **Financial**

Financial Operations has set the following expectations for financial record retention (see SPG 604.1 for additional information). It is important to note the following:

- time period is dependent upon the source of funding
- when the time period has expired, the records should be destroyed (e.g., shredded)

Per the SPG, “Financial records include but are not limited to vendor contracts, purchase orders, vendor payments, payroll payments, reimbursement documentation, income and expense summaries, allocations and reconciliations. Business and financial records, whatever their format, are to be retained for the proper periods. The business and financial records may be retained in the traditional written format, in electronic format or in an imaged format...”

Documents Retained Solely by the Unit

Documentation that is available only in the unit must be maintained for the time period specified by the funding source (see below).

Unit files serve as the working files for monitoring and managing a unit’s activities. These files are often used to verify appropriateness of financial activity. Therefore, this information must be available to internal and external auditors for the time period specified by the funding source (see below).

Documents Retained Centrally

Financial documents that are maintained centrally, either in original, microfilm, or electronic format (e.g., MPathways data warehouses or imaging), should be retained within the College only for two years plus the current year. Appropriate documentation should include:

Payroll Documentation	Cash Receipts
Transfer, Invoice & Travel Vouchers	Cash Payments
Service Unit Billing Statements	Statements of Activity
Sales Invoices & Credit Memoranda	Encumbrance Reports
Purchase Orders & Requisitions	Organization Reports
Approval of Application for Grant or Contract Forms	Project Budget Reports

Audits & Court Proceedings

Please note that the unit should retain any records pertaining to financial activity that is currently undergoing an audit or is part of a court proceeding even if the general guideline for retention has expired. Direction on the appropriate disposition of such files should be sought from the Director of Financial Operations, Director of University Audits, and/or The Office of the General Counsel, as appropriate.

Sales Tax, Unrelated Business Income & Tax Returns

If your unit is involved in any of these, please consult the SPG (604.1) for specific information on record retention.

**Financial Retention Periods by Funding Source**

Sponsored Program Funds

Per the SPG, “Sponsored activities administered under the terms and conditions of a grant or contract agreement normally required retention of records for seven (7) years *from the expiration date of the agreement* except as otherwise stated therein. This time period is measured from the final project ending date extended by any amendments or medications.”

#### Gift and Endowment Funds

Per the SPG, “Department gift records should be maintained for a period of seven (7) years *from the time of receipt*. To ensure a complete understanding, and compliance with, all agreements relating to an Endowment, all documents relating to all Endowment are to be maintained in the permanent trust endowment files in the Financial Operations’ vault. All such documents should be forwarded to the Endowment Fund, Attention: Endowment Supervisor, Sixth Floor Wolverine Tower, for proper filing.”

The College policy is to retain all documentation that describes the purpose of gifts *until seven (7) years after the financial activity on the gift has ended*. It is important that departments note whether any restrictions placed upon use of these funds were identified by the donor(s) or by the unit (as the latter can more easily be modified).

#### General, Designated and Auxiliary Funds

All of these funds are considered non-sponsored activities. The required record retention is the current fiscal year plus the two prior fiscal years.

#### Rebilling Funds

Since service (rebilling) units bill sponsored projects, they are required to meet the retention period identified for Sponsored Programs (i.e., seven years from the date of final activity).

#### **Student Records**

Many offices at the University of Michigan collect and maintain information about students. All student files are subject to the federal Family Education Rights and Privacy Act (referred to as FERPA or the Buckley Amendment). Departments are encouraged to maintain working files to support student services functions and must, therefore:

- understand the rights of students to examine their records;
- dispose of information in a manner that will not violate its confidential nature;
- have a written statement of its policies and procedures for handling student records; students have a right to examine this statement.

The student records retention website is [http://www.ogc.umich.edu/faq\\_student.html](http://www.ogc.umich.edu/faq_student.html).

#### FERPA

The federal Family Education Rights and Privacy Act (referred to as FERPA or the Buckley Amendment) gives individual students and former students the right to inspect, review, and challenge the content of their own education records, and prohibits the release of “personally identifiable records” without consent, except under limited

circumstances. “Student Rights and Student Records” is published on the Office of the Registrar web site: <http://ro.umich.edu/ferpa/index.php>.

### Admissions Information

The official “Admitting Office” is required to permanently retain the following:

- Applications
- Test Scores (e.g., SAT, GRE, etc.)
- Transcripts from former schools

Official Admitting Offices for College of Engineering programs include:

- Undergraduate Admissions (new freshmen)
- CoE Transfer Admissions (transfer students)
- Rackham Graduate School (CoE Rackham graduate programs)
- CoE Office of Graduate Education (CoE Non-Rackham graduate programs)

It is recommended that departments maintain working files to manage their graduate admissions activity. Once an admissions cycle is complete, departments are encouraged to integrate any admissions documents retained solely by the department into the department’s active student files\*. It is not necessary to keep historical files for applicants who were not admitted, although departments may decide to keep these files for one year in case the individual decides to reapply.

\*Note: FERPA states that letters of recommendation not accompanied by waivers and retained beyond their intended use may be viewed by the student. As a consequence, it is recommended that these letters be destroyed after admission of the student. Waivers of rights of access filed with letters of recommendation should be retained as long as the file is retained. Students who revoke their waivers of rights of access may not see letters of recommendation submitted during the time the waivers were in force.

### Student Records

It is recommended that departments maintain working files for students who are active in their respective programs. Departments are encouraged to retain files for a minimum of six months for students who have graduated from their program(s).

The Student Records Office of the College of Engineering maintains the official undergraduate student file electronically via ImageNow, and archival files on microfilm.

The following documents are maintained in these files:

- Admission Application
- Admission Data Sheet
- Freshman Comment Sheet
- High School Transcripts
- College/University Transcripts
- Advance Placement Sheet
- Advanced Credit Sheet
- Combined Degree Paperwork

- Declaration Forms (includes Plan, LS&A Minors, and Concentrations)
- Prescribed Program Sheet
- Degree Audit Related Paperwork
- Transfer Credit to Rackham Memo
- Scholastic Standing Committee Material
  - Petitions for:
    - Reinstatement
    - Exception to College Rules
    - Late Drop/Add
    - Retroactive Term Action
  - Supporting Documentation
- Withdrawal Notices, Drop/Add Forms
- Signed Honor Code Agreement
- Departmental Student Documentation

The Office of the Registrar permanently retains the following student records:

*Academic Records Area*

Academic Record

Grade Sheets

Supplemental Grade Sheets

Credit By Exam

Election Documents

- a) Reg-Infos w/Elections
- b) Original Drop/Add Form
- c) Withdrawals
- d) Disenrollments
- e) Fee Changes
- f) Retro Drop/Add
- g) Exceptional Drop/Add
- h) Change Forms
- i) Special Approvals

General Registers and Catalogs

*Certification Area*

Athletic Eligibility Certification

Diploma Problems

Residency Files

Transcript Problems

VA Certification

VA Course Approval

VA Compliance Survey

*Diploma Area*

Final Degree List

Tentative Degree List

Name Change Request Forms

Master File

- a) Registrationnaire (prior to 1975)
- b) Name change cards
- c) Diploma Apps
- d) Fee Changes
- e) Withdrawals
- f) Teaching Fellows
- g) Reg Infos without elections (since 1975)

*Statistical Services*

Assigned Sequence Summary (FTE)

Course Approval Form

Course History Info Report

Degrees by Race

Degree Listings Annual

Election Audit/Inquiry

Engineering Manpower Enrollment

Enrollment Counts

Enrollment Register List

Faculty Load Report State Budget

Faculty Load Report Unit

Fee Enrollment Data Reporting

Field of Specialization Count

Full Time Equivalent

Master Course List

New Freshman

Posting Boards

Registration Information  
Scholarship Reports  
Suspense Inquiry  
Transfer: Jr. College by School  
University Course Data Base

*Associate Registrar*

Fee Bulletins  
Fee Committee Minutes  
CIC Traveling Scholar Program  
Dual Program Wayne State  
Subpoenas  
Academic Calendar  
Honors Convocation Program

## Student Financials

The Student Financial Operations Office maintains information about charges assessed and payments made to a student's account.

## Financial Aid

As stewards of University financial aid funds, departments must retain the following information:

- Document that describes the award process for each scholarship and fellowship awarded by the unit
- Official minutes/documentation of meetings in which decisions are made on the award of scholarships and fellowships

## Related Policies and Procedures:

*University Archives and Records*, SPG 601.8, June 1, 1992

*Identification, Maintenance, and Preservation of Electronic Records Created by the University of Michigan*, SPG 601.8-1, May 20, 1997

*Records Policy and Procedures Manual*, Bentley Historical Library, University Archives and Records Program, June 2002

*Student Rights and Student Records*, University of Michigan Office of the Registrar, June 2002

*Permanent Record Retention at the Office of the Registrar*, University of Michigan Office of the Registrar, 1991

*Policies on Student Records*, University of Michigan Board of Regents, July 13, 1973

*Proposed Guidelines for Access to and Use of Materials in the Records Office*, College of Engineering, August 16, 1990

*Policies and Procedures for Awarding Graduate Fellowships and Undergraduate Financial Aid in the College of Engineering*, Memo from Judith Pitney to CoE Department Chairs, Program Directors, Unit Administrators, and Members of the Dean's Cabinet, March 22, 2000

## **Human Resources**

The central Human Resources Offices are the custodians for all personnel related documents. Current policy (SPG 201.46) lists the forms that are considered to be employment related and maintained in the central administrative offices. The policy also states that departmental copies of the same forms must be maintained for a period of two years plus the current fiscal year.

The Office of Resource Planning and Management (RPM) maintains complete personnel records for faculty and staff in all job families with the exception of Temporary Hourly and Graduate Student Assistants and fulfills the two year requirement detailed in SPG 201.46. All transactional HR related paperwork with the exception of time sheets should be routed to RPM to be maintained in the CoE personnel file. It is also the responsibility of the units to maintain

copies of all documents that are not routed through RPM. These documents include, but are not limited to:

- Temporary Employment Applications and Change Forms
- GSA appointment paperwork
- Time Sheets
- Internal department emails, memos, etc. pertaining to an individual's employment
- Medical documentation (that does not support the use of Extended Sick Pay)

It is important to remember to keep copies of immigration documents, medical information, and grievance documentation in separate files. These types of information are not to be included in a staff member's personnel file.

Casebooks are maintained according to UM policy in both the Office of the Associate Dean for Academic Affairs and the Associate Dean for Research.

Departments are the custodians for all recruitment/search files (including faculty and staff) and are required to retain such files for three years plus the current fiscal year, according to current policy. (Job recruitment files including resume, interview questions, list of interviewed candidates, interview notes, etc. of the hiring process for a period of four (4) years after the start date of the selected candidate).

All employment related departmental files are subject to the laws regulating employee's access to their personnel files. In the event of a discrimination charge or a lawsuit, all relevant records must be kept until the final disposition

#### Related Policies and Procedures

*Personnel Records-Collection, Retention and Release*, SPG 201.46, October 1, 1991

*Recruitment and Regular Employment Process (Regular)*, SPG 201.22, October 1, 2008

The attached table, *Federal Record Retention Requirements for Employers*, details the legislation related to records retention and the associated requirements.

There are websites that provide information on Michigan employment law. A useful site is: <http://www.dol.gov/esa/programs/whd/state/state.htm>.

#### **Governance**

It is the responsibility of administrators of colleges and schools in cooperation with the Bentley Historical Library's University Archives and Records Program (UARP), to ensure that records are maintained properly and that records which document the history and achievements of the college or school are transferred to the archives for permanent retention. The section below is an excerpt from the University Records Policy and Procedures Manual <http://bentley.umich.edu/uarp/home/about.php#whatare>.

Specific record groups that should be transferred to the university archives include:

- the chair's or director's topical file and correspondence
- committee records, particularly executive and curriculum committees
- faculty or staff meeting minutes
- documentation of reviews of the unit
- general development files
- reports, including annual reports
- identified photographs
- newsletters and other publications of the unit

Records that should not be transferred to the archives, but which should be discarded when their administrative use is completed include:

- duplicate items
- correspondence and administrative files documenting routine activities such as room scheduling, travel logistics, etc.
- non-university printed material received by the unit and retained as a reference file
- documents distributed widely to university units but not generated by the unit

### **Grievances**

The Office of Compensation and Staff Relations is the sole custodian of staff grievance files. The Office of Academic Affairs and the Office of the Dean/Director of the relevant school or college are the custodians of instructional faculty and primary research faculty grievance files.

Departments may choose to keep a copy of the grievance and related documentation. However, in such cases it is important to remember to keep information related to a grievance in a separate file. These documents are not to be included in an individual's departmental personnel file.

### **Facilities & Safety**

The responsibility for maintaining floor plans and other architectural documents rests with the central university offices of Architecture, Engineering and Construction (AEC). Units may forward blue prints, floor plans, and other types of architecture/facilities documents that you feel may be of historical value to the CoE Facilities Office. Such documents will be forwarded on to the Bentley Library as appropriate.

The Office of the Associate Dean for Academic Affairs maintains a central file for the College Safety Committee. Refer to the "Governance" section of this document for guidelines applicable to departmental/unit safety committees.

Please note that units should retain any records pertaining to safety issues that are currently undergoing an audit, investigation, or are part of a court proceeding until the matter has been resolved.

### **Handling of Student Records within the Department**

**(Date)**

The following offices are responsible for retaining the official student records:

- Office of Undergraduate Admissions, as the admitting office for new freshmen
- CoE Transfer Admissions, as the admitting office for CoE transfer students
- Rackham Graduate School, as the admitting office for Rackham graduate programs
- CoE Office of Graduate Education, as the admitting office for CoE Non-Rackham graduate programs
- Office of the Registrar and College of Engineering Student Records Office

It is the policy of this department to maintain working files to support student services functions for students who are active in our programs. The department retains such working files for *(insert time period)* for students who have graduated from our programs.

The department maintains working files to manage our graduate admissions activity. Once an admissions cycle is complete, the following documents are integrated into the department's active student files:

*(insert as appropriate)*

The files for applicants who were not admitted *(insert as appropriate -- are not retained or are retained for one year in case the individual decides to reapply)*.

Consistent with the FERPA, only those who have a need to know have access to these records. This includes:

*(insert as appropriate)*

The department prohibits the release of "personally identifiable records" without consent of the student, consistent with FERPA.

Students wishing to inspect their working file, should *(insert procedure)*

Students may wish to review the University's policy, "Student Rights and Student Records", which is published on the Office of the Registrar web site: <http://ro.umich.edu/ferpa/index.php>.

The department prohibits the release of "personally identifiable records" without consent of the student, consistent with FERPA.