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Lock Haven University Records Management Policy

Introduction

Lock Haven University is committed to effective records management to preserve its history, meet legal standards, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed. Lock Haven University requires that different types of records be retained for specific periods of time, and has designated official repositories for their maintenance. These records must be managed according to procedures that are outlined in this document.

Definitions

- A. Active Record: A record with current administrative use. Records remain active for varying numbers of years, depending on the purpose for which they were created.
- B. Archival Record: A record that is inactive, not required to be retained in the department in which it originated or was received, and has permanent or historic value. Archival records are retained and preserved indefinitely.
- C. Archival Repository: A collection of archival records regardless of format. This includes repositories responsible for the permanent retention of official records and reports of the university, its officers and component parts; maps and architectural records; audiovisual materials including still photographs and negatives, motion picture film, oral history interviews, audio and video tapes; electronic records including email; and artifacts and ephemera documenting the university's history.
- D. Department Records Coordinator: The individual designated within each department to maintain the department's records management schedule and to ensure that individuals are following this policy, records management priorities, and following the records retention schedule, including the ultimate disposition of records.
- E. Electronic Record: A record in a digital format, including word processing files, spreadsheet files, web pages, email, and data entered into a database, etc.
- F. Email: Email is a type of electronic record. An email message may be an active record, an inactive or non-record, a transitory record, or an archival record.
- G. Inactive Record: A record without current administrative use or business purpose for Lock Haven University; a record that should be deleted or destroyed.
- H. Non-Records: The following materials are considered to have no administrative, legal, fiscal or archival requirements for their retention. They may be disposed of as soon as they have served their reference purpose.

- a. Duplicates: Extra copies of correspondence, completed forms, bulletins, statistics, reports, hardcopy printouts from a database, electronic files extracted from a master file or database, mailing lists, etc., used only for reference or informational distribution.
- b. Document Errors: Incorrect versions of documents, forms or reports that had to be regenerated in order to correct errors in typing, data entry, spelling, grammar, or format.
- c. Miscellaneous Notices or Memoranda: Memos and postings that do not relate to the functional responsibility of the department (i.e., announcements of meetings, reservations, confirmations, itineraries, acknowledgements, form-letter thank you notes, etc.).
- d. Preliminary Drafts
- e. Published Reference Materials: Printed materials received from other LHU offices, vendors or other non-LHU institutions, which require no action and are not needed for documentary purposes. May include technical reports/studies, magazines, catalogs, periodicals, flyers, announcements, newsletters and other widely distributed printed materials received by a LHU office.
- f. Requests for Information: Routine memos or forms used to request, or respond to requests for: information, forms, mailing lists, database printouts, publications, requests for computer printouts, etc. Retain until after the information has been sent or received.
- g. Routing Slips: Memos used to direct the distribution of documents. Stocks of Publications: Supplies (multiple copies) of departmentally-produced printed documents which are superseded, obsolete or otherwise valueless. May include program brochures, booklets, flyers, forms, catalogs, directories, manuals, posters and other informational materials produced by a department for wide distribution.
- i. Transmittal Memos: Letters and FAX cover sheets which accompany a document, report, form, etc., that do not add any substantive information to the transmitted material.
- I. Official Record: The original copy of a record (in any record format) prepared, owned, used, received, or retained in the course of university business. Repositories for these records are identified in the Records Retention Schedules.
- J. Official Repository: The unit designated as having responsibility for retention and timely destruction of particular types of official university records. Such responsibility is assigned to the unit's department records coordinator.
- K. Record: Information, regardless of physical form or characteristics, that documents a transaction or activity of the university that is created, received, or retained pursuant to law or in connection with a transaction, business, or activity.
- L. Record Category: Typically, but not necessarily, university records fall into the following categories:
 - a. Academic Administration and Management
 - b. Alumni
 - c. Deeds, Leases, Licenses, Contracts
 - d. Facilities
 - e. Financial
 - f. General Administration and Management

- g. Health and Safety
- h. Legal
- i. Medical
- j. Personnel
- k. Public Safety
- l. Publications, Statistical Data Documents, Reports
- m. Risk Management
- n. Sponsored Projects, Contracts, Grants
- o. Student
- p. Tax

- M. Record Format: The medium in which the record is conveyed. Examples include: handwritten, printed, recorded, photographed, micrographed, electronic (including database entries) and email (both sent and received), etc.
- N. Records Retention Schedules: Tables showing which records are retained, who is responsible for keeping them, and for what period of time. The Record Retention Schedules for Lock Haven University are included in the appendices to this policy.
- O. Reference Record: A record maintained for reference purposes beyond the established retention period upon approval of the respective Department Records Coordinator.
- P. Right to Know: The Commonwealth of Pennsylvania Right to Know Law, Act 3 of 2008 (65 P.S. §§ 67.101 et seq.) "Unless otherwise provided by law, a public record shall be accessible for inspection and duplication by a requester in accordance with this act."
- Q. Transitory Record: A document of short-term interest that has no lasting business value.
- R. University Archives: There is no single archival repository for records and materials at Lock Haven University. Consult the Records Retention Schedule for specific archival repositories at Lock Haven University.
- S. University Archivist: There is no Lock Haven University Archivist. A university archivist ordinarily has several responsibilities: 1) designating which official university records are archival; 2) effecting the transfer of archival records from the office in which they originated or were received to the University Archives at such times and in the manner and form prescribed by the Archives and subject to the appropriate retention and disposition schedules; 3) maintaining the University Archives. The University Records Management Administrator performs the first responsibility; the other responsibilities are performed by individual Department Records Coordinators. See the records retention schedules in Appendix A of this document.
- T. University Record: The original copy of a record (in any record format) prepared, owned, used, received, or retained in the course of university business. University records are the property of Lock Haven University.
- U. University Records Management Administrator: The University Records Manager has ultimate authority for the University records management policy, including records retention. At Lock Haven University the Vice President for Administration and Finance is the University Records Management Administrator.

Policy

A. Overview:

Lock Haven University requires consistent treatment of records. Maintenance, retention, and disposal procedures for university records (see the "Definitions" Section of this document) must be followed systematically by university employees.

In addition, duplicate or multiple copies of these records, retained in locations other than official repositories (see the "Definitions" Section of this document), must also be disposed of when they no longer serve a business purpose.

This policy is intended to ensure that the university:

- meets legal standards;
- optimizes the use of space;
- minimizes the cost of record retention;
- preserves the history of the university;
- destroys outdated and useless records.

B. Roles

1. Executive Level: The Vice President for Administration and Finance will be responsible for policy, procedures including storage and archiving, archiving decisions, guidelines and direction, and coordination of the program.
2. Department Level: Each department will be responsible for its own retention schedule, business practices, and audit procedures, following the guidelines and direction from the executive level.
3. Facilities: The Facilities department will be responsible for providing physical record support and coordinating document storage and disposal according to the temporary document holding procedure.
4. Information Technology: The Lock Haven University Information Technology Department will be responsible for providing electronic records storage and archiving according to the policies and procedures of the IT Department.

Procedures

4.1. Responsibilities for Managing Official University Records

Departments and units that maintain university records are called "official repositories." These administrative units are responsible for establishing appropriate record retention management practices according to this policy. Each Department Records Coordinator or designee must:

- a. implement the department's and/or office's record management practices;
- b. ensure that the department's and/or office's record management practices include management of e-mail and other electronic documents;

- c. ensure that these management practices are consistent with this policy;
- d. educate staff within the administrative unit in understanding sound record management practices;
- e. preserve inactive records of historic value, and transfer those records to the appropriate University repository;
- f. ensure that access to confidential files is restricted. Long term restrictions on access to selected archival records should be negotiated at the time of their transfer to the appropriate University repository;
- g. destroy inactive records that have no archival value upon passage of the applicable retention period.

If you have any questions about your responsibilities, contact the office of the University Records Management Administrator (see the “Contacts” Section of this document). This office will help you understand this policy and implement these responsibilities.

4.2. Preserving or Disposing of Official University Records

When the prescribed retention period (see Records Retention & Disposal Schedule in Appendix A) for official university records has passed, a determination of whether to preserve or dispose of the documents must be made. In accord with appropriate laws and regulations the University Records Management Administrator has the ultimate responsibility and the authority to designate which records are to be discarded and which are to be retained and for what duration. Each university office and employee is responsible for reviewing records and retaining them as specified in the retention schedules of this document. This includes the review of records generated or maintained in university information systems or equipment (including mainframe, mini, and micro computing/storage systems).

Archival Records

If you have determined that the records are archival, they must be transferred to the appropriate official repository.

Non-Archival Records

If you have determined that it is appropriate to dispose of a record, destroy it in one of the following ways:

1. Recycle non–confidential paper records.
2. Shred or otherwise render unreadable confidential records.
3. Erase or destroy electronically stored data.

4.3. Records Retention: Location and Duration

It is the responsibility of every university office and individual retaining official records to insure compliance with this policy.

The Records Retention & Disposal Schedule [Appendix A] lists the official repositories for university records as well as how long these records must be retained.

Record retention periods may be modified by statute, regulation, judicial or administrative order, contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy. Suspension of record destruction required by any of these reasons will be accomplished by a notice sent out to Official Repository Offices and University Department Records Coordinators by the University Records Management Administrator, the Office of Legal Counsel, the State System Audit Office, the Office of Finance and Administration, or the Office of Sponsored Programs.

Cautions

5.1. No document list can be exhaustive.

Questions regarding the retention period for any specific document or class of documents not included in the records retention tables should be addressed to the University Records Management Administrator.

5.2. Official records shall be destroyed when they have no business function.

Departments and units that are not official repositories and that retain duplicate or multiple copies of these university records shall dispose of them when they no longer have a business function for the University. Requests to maintain records for reference purposes beyond the retention period must be approved by the University Records Management Administrator. Any record, whether current or maintained beyond the retention period, may be subject to production in the event of legal action against the University, or in response to a request for records under the Pennsylvania Right-to-Know law.

Policy Review

Department Records Coordinators shall periodically review records generated and maintained by their department to ensure that the requirements of this policy are met. Each department shall review its records retention schedule annually to ensure it is complete with recent changes. All changes to retention schedules are to be submitted to the University Records Management Administrator. In addition, each department shall conduct a records review and archiving process annually at the end of each fiscal year to be completed by the end of that calendar year. The University Records Management Administrator may review department's procedures to ensure adherence to the requirements of this policy.

Appendix A

Type of Record	Official Repository	Duration (Years)
Academic Department		
Criminal Background Checks, students	Program Administrator	3 from student's completion of program
Curriculum Requirement Adjustment Denials	Academic Department	6
Independent Study Forms, completed	Academic Department	2 from student's completion of program
Internship Denials	Academic Department	2 from student's completion of program
Letters of Recommendation, student	Academic Department	2 from student's completion of program
Student Clinical Evaluations (Nursing)	Program Administrator	Permanent
Student Medical Records (Nursing)	Program Administrator	3 from student's completion of program
Advising and Career Services		
Lock Haven Alumni Job Placement Credentials	Career Services & Alumni Relations	Minimum of 7 following graduation
Admissions - Graduate		
International Student Forms (Visa documentation, etc.)	Graduate Admissions	5 from start of application term
Letters of Recommendation	Graduate Admissions	5 from start date of application term
Miller Analogies Test, GRE Test Scores (except for those in a student's academic record, which is permanent)	Graduate Admissions	5 from start date of application term
Student Waivers for Right of Access (See Letters of Recommendation for Admission)	Graduate Admissions	5 from start of application term
Transcripts (High School and Other College)	Graduate Admissions	5 from start of application term

Admissions - Undergraduate		
Advanced Placement, Applications for Admission, Relevant Correspondence, Entrance Exam Reports (ACT, CEEB, et. al.), Residency Classification Forms, Letters of Recommendation, Transcripts — High School and Other College (except for those in a student’s academic record, which is permanent)	Undergraduate Admissions	3 from start date of application term
International Student Forms, completed (Visa documentation, etc.)	Undergraduate Admissions	3 from start date of application term
Letters of Recommendation	Undergraduate Admissions	3 from start date of application term
Residency Certificates	Undergraduate Admissions	3 from start date of application term
Residence Change Documents (Non-resident to Resident)	Undergraduate Admissions	3 from start date of application term
Student Waivers for Right of Access (See Letters of Recommendation for Admission)	Undergraduate Admissions	3 from start date of application term
Transcripts (High School and Other College) (except for those in a student’s academic record, which is permanent)	Undergraduate Admissions	3 from start date of application term
Student Accounts		
Hold or Encumbrance Authorizations	Student Accounts	Until Released
Student tuition and fee data, online	Student Accounts	Indefinite
Tuition and Fee Charges, if account has zero balance	Student Accounts	2 fiscal, with no activity
Counseling and Psychological Services		
Counseling Patient Records (Regulatory) – <i>see Appendix B</i>	Counseling Center	5 from the last date of service
Financial Aid		
Student Loan Records	Financial Aid	3 after PIF, assigned or cancelled
Federal student aid program records	Financial Aid	3 from end of award year

Federal Perkins records	Financial Aid	3 from date that loan was assigned to U.S. Dept. of Education, cancelled, or repaid
Veteran Administration Certifications		5 from graduation or date of last attendance
International Student Services		
International Student Services (Immigration Records only)	International Office	Permanent
Records and Registration		
Academic Actions (Dismissal, etc.)	Registrar	5 from graduation or date of last attendance
Academic Records (including narrative evaluations, competency assessments, etc.)	Registrar	Permanent
Change of Course Forms, completed -Continuing Education, Summer Sessions, Extramural Studies	Registrar	5 from date of enrollment
Change of Grade Forms, completed	Registrar	Permanent
Change to Student ID number	Registrar	Permanent
Class Roster of Student Names	Registrar	Permanent
Confidentiality Hold Forms, completed	Registrar	Permanent or until student rescinds in writing
Curriculum Change Authorizations	Registrar	5 from graduation or date of last attendance
Degree, Grade, Enrollment, and Racial/Ethnic Statistics	Registrar	Permanent
Enrollment Verifications	Registrar	1 from enrollment date
Grade Sheets	Registrar	Permanent
Graduation Lists	Registrar	Permanent
Hold or Encumbrance Authorizations	Registrar	Until Released
Name Changes	Registrar	Permanent
Original Grade Sheets	Registrar	Permanent
Reinstatement Records	Registrar	Permanent

Student Class Schedules	Registrar	1 from graduation date or date of last attendance
Student Registration Forms- Continuing Education, Summer Sessions, and Extramural Studies	Registrar	1 from registration
Transcripts	Registrar	Permanent
Transcript Requests	Registrar	1 from submission date
Transfer Credit Evaluations	Registrar	5 from graduation
Withdrawal Authorizations / Leaves of Absence	Registrar	2
Student Life and Housing		
Damage Records (including pictures)	Student Life & Housing	7 from term of occupancy
Emergency Cards	Student Life & Housing	1
Housing Agreements	Student Life & Housing	7 from term of occupancy
Dining Plan Agreements	Student Life & Housing	7 from term of occupancy

Appendix B

SECURITY & DISPOSAL OF LHU COUNSELING SERVICE RECORDS POLICY

1. According to the Professional Psychologist's Practice Act (1972, P. L. 52) Rules and Regulations Section of the State Board of Psychology, the following statement is applicable to our setting (41.57) Section (8) (d & E): "To meet the requirements of the Section, so as to provide a formal record for review, but not necessarily for other legal purposes, psychologists shall assure that all data entries in professional records are maintained for at least a period of five years after the last date that service was rendered. The Psychologist shall also abide by other legal requirements for records retention; even if longer periods of retention are required for other purposes." "The Psychologist shall provide for the confidential disposition of records in the event of the Psychologist's withdrawal from practice, incapacity or death."
2. The International Association of Counseling Services (IACS) recommends that inactive files or the "complete record should be maintained for a minimum of 7 years from the last date of entry."
3. Given these Legal Statutes and Accreditation Standards, the LHU Counseling Service will maintain the complete Counseling Record of Inactive cases for a minimum of 7 years.
4. The disposal of LHU Counseling Service records shall be consistent with the IACS Professional Standards and relevant Statutes. Records shall be covered and stored in temporary closed portable storage bins and may be picked up by a professional disposal service. Only LHU Counseling Service Faculty and Staff may have access to Counseling Service Records for purposes of the preparation of and disposal of records. Under the guidance of the Counseling Service Director, Counseling Service Staff will have access to clinical files consistent with their clerical role and client purposes.
5. Confidentiality and appropriate handling of the information and records must be reflected in the collection, classification and maintenance of the data, administrative, security, and in dissemination of information regarding clients. Records must be secure and should be kept in a central area. Hard copy records must be stored in a secure area, such as locked file cabinets. In the case of computerized records, password protection and other physical safeguards must be in place to ensure the confidentiality of stored material. Regardless of the case record form used by the Center, all case records are the property of the LHU Counseling Service and the University.
6. Access should be limited to LHU Counseling Service Personnel only and Counseling Service Records must be kept separate from records of any other entity. Records are subject to the requirements of the Family Educational Rights and Privacy ACT (FERPA), 20 U.S.C. 1232g et seq. The Director of LHU Counseling Service (CS) is the Custodian of Records with the Dean of the College of Business, Information Systems & Human Services as a "backup" to insure the security of records in the event of a work stoppage or other specified circumstances (incapacity of the (CS) Director, natural & man-made disasters).

REFERENCES

International Association of Counseling Services. Accreditation Standards for University and College Counseling Centers. Alexandria, VA. 2000.

Pennsylvania Commonwealth. "The professional Psychologist's Practice Act." P.L. 136, 1972.

State Board of Psychology. " Rules and Regulations." Harrisburg, PA. 1972.

Received from Provost & Senior Vice President, Donna Wilson, as approved by A. St. Ledger (PASSHE Legal Counsel), Senior Staff, and President
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