

Record Retention Schedule Policy

Policy number: 106
Policy owner: Chief Information Security Officer

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SECTION I. PURPOSE

This policy establishes timeframes for the retention of University records. This policy is intended to be read in conjunction with the Data Management Policy.

SECTION II. SCOPE AND APPLICABILITY

This policy applies to all St. Thomas records. This policy applies to all employees (faculty, staff and student workers), volunteers, contractors, student clubs and organizations, schools, colleges, divisions, departments and other units.

SECTION III. DEFINITIONS

When used in this policy, the following terms have the following meanings:

- a. **Archival record** means a record that has enduring historical value to St. Thomas, including (i) the categories denoted as archival records in the record retention schedule; and (ii) any other data the University Archivist or President designates as an archival record from time to time in accordance with applicable policy.
- b. **CISO** means the university's Chief Information Security Officer or designee.
- c. **Data steward** is any St. Thomas faculty or staff member to whom a data owner has designated day-to-day responsibility for the care and management of a particular category or set of data, whether or not the data steward directly holds the data.
- d. **Data owner** means each unit manager and any other St. Thomas position designated as having ultimate responsibility for the management, retention and destruction of particular data or categories of data.
- e. **Record** means any recorded information created or received in the course of conducting St. Thomas operations, that is in a category of data required to be retained for any period of time under this policy. Records may be in any recorded format, including but not limited to electronic and physical documents and communications, film and print graphics, and audio and video recordings. Records do not include collections, duplicates, reference data or transitory communications.
- e. **Record retention schedule** means the schedule found in Appendix A.
- f. **Retention period** means the retention period for designated categories of records, as set forth in Appendix A.

SECTION IV. GOVERNANCE OF RECORDS

St. Thomas maintains records for business purposes and as required by law. St. Thomas records are governed by the Data Management Policy and the schedule attached as Appendix A. The Data Management Policy should be consulted when questions arise regarding the storage, maintenance, and destruction of records. The Archival Records Policy should be consulted with respect to the process for archiving records.

The record retention schedule is not exhaustive. Its categories and retention periods are based on applicable law and the university's known operational needs and institutional interests. If individuals have questions about whether particular data is a record or fits into a particular records category, or believe that data they maintain should be added to the record retention schedule, they should contact the CISO or Office of General Counsel.

Appendix A may be modified by the relevant data owner, in consultation with the Office of General Counsel, on a temporary or permanent basis. Temporary modifications may be warranted for litigation holds, judicial or administrative orders, audits, contractual requirements or special circumstances. Modifications will be communicated to affected data stewards by an authorized St. Thomas representative. Data stewards are responsible for communicating modifications to data holders.

SECTION V. SCHEDULE

Appendix A sets forth the record retention schedule.

Appendix A to Record Retention Schedule Policy

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Category	Data Owner	Retention period	Archival Record?
Academic Affairs Records			
Accreditation Approvals	Vice Provost's Office	Permanent	Yes
Bulletins and Course Catalogs	Student Data and Registrar's Office	Permanent	Yes
Faculty Tenure and Promotion Review and Decision Records	Provost's Office	8 years after employment ends	No
Faculty Grievance Records	Provost's Office	8 years after grievance resolves	No
Faculty contracts and appointment letters	Vice Provost's Office	8 years after employment ends	No
Student feedback on instruction data and reports	Vice Provost's Office	8 years after employment ends	No
Accounting Documents			
Capital Asset Records	Controller's Office	3 years after asset is fully depreciated or disposed/sold	No
Account Ledgers	Controller's Office	7 years	No
External Survey Documentation	Controller's Office	7 years	No
Inventory Records	Controller's Office	7 years	No

Category	Data Owner	Retention period	Archival Record?
Bond documentation	Controller's Office	7 years	No
Cash Management Support	Controller's Office	7 years	No
Account Ledgers	Controller's Office	7 years	No
Cancelled Checks	Controller's Office	8 years	No
General Ledgers	Controller's Office	7 years	No
Internal Auditor's Reports	Controller's Office	7 years	No
Tax Returns; Tax Return Supporting Documentation	Controller's Office	7 years	No
Correspondence with IRS	Controller's Office	7 years	No
Audited Financial Statements	Controller's Office	7 years	Yes
Audit Workpapers	Controller's Office	7 years	No
Bank Statements	Controller's Office	3 years	
Journal Entry support and documentation	Controller's Office	7 years	No
Insurance claims and details	Controller's Office	30 years	No
Admissions Records			
Acceptance Letters (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Applications (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Supporting Documents (Letters of Recommendation, Essay, Resume, Code of Conduct) (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Correspondence (emails, application notes) (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Application Transcripts (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No

Category	Data Owner	Retention period	Archival Record?
Standardized Test (ACT, SA, GED) (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Entrance and Placement Exams (enrolled)	Admissions	5 Years after degree is awarded or last attendance	No
Acceptance or Admission Decision Letters (Applicant; did not enroll)	Admissions	3 years after application term	No
Applications (PDF) (Applicant; did not enroll)	Admissions	3 years after application term	No
Supporting Documents (Letters of Recommendation, Essay, Resume, Code of Conduct) (Applicant; did not enroll)	Admissions	3 years after application term	No
Correspondence (emails, application notes) (Applicant; did not enroll)	Admissions	3 years after application term	No
Application Transcripts (Applicant; did not enroll)	Admissions	3 years after application term	No
Standardized Test (ACT, SAT, GED) (Applicant; did not enroll)	Admissions	3 years after application term	No
Paper application documents provided by student (enrolled OR Applicant; did not enroll)	Admissions	1 year after application term; if copy is original document and only one in existence, it will be returned to student	No
Alumni Records			
Alumni Newsletters	University Advancement	Permanent	Yes
Alumni Directories	University Advancement	Permanent	Yes
Archival Records and University Libraries			
Archival Records	University Archivist	Permanent	Yes

Category	Data Owner	Retention period	Archival Record?
Special Collections	University Archivist	As determined by gift instrument or by university president or designee	No
Collections	AVP for University Libraries	As determined by AVP for University Libraries	No
Athletics Records			
Game-Day Publications (Media Guides, Programs) (hard copy)	Athletics External Affairs	Permanent	Yes
Athletic Contracts (coach contracts, facility rental agreements, athletics corporate contracts, game contracts)	Athletics Business Office	7 years following termination or expiration	No
Post-Season NCAA tournament Bids	Athletics Business Office	6 years	No
Athletic Grant-In-Aid Non-Renewals Business/Compliance Paper	Financial Aid Office	6 years	No
Equipment Ordering and Inventory Forms	Athletic Equipment Team	6 years	No
Athletic Department Meeting Agendas and Minutes	Main Athletic Office	Permanent	Yes
Required Compliance Reports (including Title IX)	Main Athletic Office	Permanent	No
10-Year NCAA Athletic Certification Steering Committee Meeting Agendas, Minutes, and Final Report	Main Athletic Office	Permanent	Yes
Staff Handbook	Main Athletic Office	6 years	Yes
Medical Records	Training Room	7 years after graduation or last year or competition/treatment in the training facility	No
Training Room Handbook	Training Room	Until superseded	No

Category	Data Owner	Retention period	Archival Record?
Medical Insurance Records	Training Room	7 years after graduation or last year or competition/treatment in the training facility	No
Injury Rehabilitation Records	Training Room	7 years after graduation or last year or competition/treatment in the training facility	No
NCAA Eligibility Records	Compliance Office	6 years	No
NCAA Student-Athlete Statement	Compliance Office	6 years	No
NCAA Drug Testing Form	Compliance Office	6 years	No
Student-Athlete Buckley Statements	Compliance Office	6 years	No
Athletic Grant-In-Aid Agreements	Compliance Office	6 years	No
National Letters of Intent	Compliance Office	6 years	No
Medical Hardship Waivers	Compliance Office	6 years	No
Medical Absence Waivers	Compliance Office	6 years	No
Student-Athlete Employment Forms	Compliance Office	6 years	No
Student-Athlete Disclosure Agreements	Compliance Office	6 years	No
Transfer Certification Forms	Compliance Office/Eligibility Center	6 years	No
Student-Athlete Eligibility/Financial Aid/ Amateurism Statements	Compliance Office	6 years	No
Acceptance of Student-Athlete Manual and Athletic Medicine Policies and Procedures Manual	Compliance Office	6 years	No
Student Host Education Form	Compliance Office	6 years	No
Student-Athlete Eligibility Waivers	Compliance Office	6 years	No
Student-Athlete Promotional Activities	Compliance Office	6 years	No
Camp and Clinic Records	Compliance Office	6 years	No

Category	Data Owner	Retention period	Archival Record?
Declaration of Outside Income	Compliance Office	6 years	No
NCAA Academic Performance Program Records	Compliance Office	Permanent	No
NCAA Academic Performance Rate Records	Compliance Office	Permanent	No
NCAA Graduation Success Rate Records	Compliance Office	Permanent	No
NCAA Violations	Compliance Office	Permanent	No
NCAA Institutional Certification Records	Compliance/Main Office	Permanent	No
Summit League Conference Audits	Compliance	6 years	
Certification of Compliance for Staff	Compliance Office	Permanent	No
Team Information, to Include: Team Rosters Squad Lists Competition Schedules Recruiting Logs Countable Hours Logs Official Visits Team Eligibility Records Team Financial Aid Reports Notification of Transfer/Entry into the Transfer Portal Staff Declarations Playing and Practice Season Declarations Local Sports Club Forms	Compliance Office	Permanent	No
Budget Documentation			
Budget Modification Forms	OFPB	7 years	No

Category	Data Owner	Retention period	Archival Record?
Budget Reports	OFPB	7 years	No
Variance Analysis Comparing Budget to Actuals	OFPB/Controller's Office	7 years	No
Projection Detail and Plan	OFPB	7 years	No
Career Center Records			
Graduating Student Survey	Career Development Services	Permanent	No
Appointment and Counseling Notes	Career Development Services	Until no longer needed	No
Contracts/Bids			
Contracts and Purchase Orders	Purchasing and Payables Department or relevant contracting department	7 years following termination or expiration (unless designated otherwise in this schedule)	No
Bids/Requests for Proposals and responses	Purchasing and Payables Department or relevant bidding/requesting department	Rejected bids/RFPs: 7 years following award Accepted bids/RFPs: 7 years following termination or expiration of contract	No
Corporate Records-Controller's Office			
IRS tax determination letter	Controller's Office	Permanent	Yes
MN Secretary of State Registration Status	Controller's Office	Permanent; renewed annually	Yes
Corporate Records			
Articles of Incorporation	Corporate Secretary	Permanent	Yes
Bylaws	Corporate Secretary	Permanent	Yes
Board of Trustees Membership	Corporate Secretary	Permanent	Yes

Category	Data Owner	Retention period	Archival Record?
Board of Trustees and Committee Meeting Minutes, Written Actions and Electronic Actions	Corporate Secretary	Permanent	Yes
Board of Trustees Meeting Materials	Corporate Secretary	25 years	Yes
Meeting Materials for Committees of the Board of Trustees	Designated Committee Staff	25 years	Yes
IRS Tax Determination Letter	Controller's Office	Permanent	Yes
Mission and Vision Statements	President's Office	Permanent	Yes
Strategic Plans	President's Office	Permanent	Yes
IRS Tax Determination Letter	Controller's Office	Permanent	Yes
MN Secretary of State Registration Status	Controller's Office	Permanent, renewed annually	Yes
Employment Records			
Interview notes (not hired or hired)	Human Resources	3 years from month position is filled	No
Application materials for individuals hired	Human Resources	8 years after employment ends	No
Application materials for individuals not hired	Human Resources	3 years after application	As long as applicant account is active, but no fewer than 3 years
Job Postings	Human Resources	3 years from month position is filled	No
Applicant EEO Self Identification, Disability and Veteran Forms	Human Resources	3 years from date position is filled	No
Applicant Background Investigations	Human Resources	6 years from date position is filled; documents retained by authorized vendor	No
Employment Eligibility Verification forms (I-9 forms)	Human Resources	8 years after employment ends	No

Category	Data Owner	Retention period	Archival Record?
Faculty and Staff Onboarding File	Human Resources	8 years after employment ends	No
Performance Management Records	Human Resources; Academic Affairs (for certain faculty records)	8 years after employment ends	No
Personnel file	Human Resources; Academic Affairs (for certain faculty records)	8 years after employment ends	No
Human Resources Investigation Records	Human Resources	8 years after employment ends	No
Logs of Occupational Injuries and Illnesses	Human Resources	7 years from the end of the calendar year that the record covers	No
First Report of Injury	Human Resources	7 years from the end of the calendar year that the record covers unless injury relates to employee exposure, in which case the record will be kept for the length of employment plus 30 years.	No
Employee Exposure Sampling Records	Environmental Health & Safety	Length of Employment plus 30 years	No
Employee Medical Records	Human Resources	Length of Employment plus 30 years	No
Workers' Compensation Files	Human Resources	8 years after employment ends or 10 years after matter is closed, whichever is longer	No
Faculty/Staff Benefits Files	Human Resources	8 years after employment ends	No
Paid Leave Records	Human Resources	8 years after employment ends	No
Compensation Records	Human Resources	8 years after employment ends	No
Pension, Welfare and Other Benefits Plans and Policies and Related Institutional Records (all inclusive)	Human Resources	10 years following plan termination and distribution	No
Union Contracts	Office of General Counsel	Life of relationship with union plus 7 years.	No

Category	Data Owner	Retention period	Archival Record?
Affirmative Action Reports or Voluntary Diversity Reports	Human Resources	5 years	No
Facilities Records			
Building Permits	Facilities Management	Life of the building	No
Building Plans, Blueprints and Design Specifications	Facilities Management	Permanent	Yes
Campus maps	Facilities Management	Permanent	Yes
Office Layouts	Facilities Management	Life of the building	No
Maintenance Records	Facilities Management	3 years following completion for annual maintenance, and life of the building for non-routine maintenance	No
Air or Water Waste Emissions Records	Environmental Health & Safety	5 years	No
Hazardous Chemical Waste Manifests	Environmental Health & Safety	3 years	No
Safety Training Records	Environmental Health & Safety	3 years	No
Leases	Chief Financial Officer	7 years after termination	No
Deeds, Real Estate Agreements and Titles	Chief Financial Officer	Permanent	Yes
Attorney Opinion Letters (property)	Office of General Counsel	Permanent	No
Mortgage Records	Chief Financial Officer	Permanent	No
Licenses and Permits (zoning, operating, etc.)	Facilities Management	5 years following expiration	No
Financial Aid Records			
Financial Aid Applications (including FAFSA)	Financial Aid	5 years after graduation or last attendance	No

Category	Data Owner	Retention period	Archival Record?
Financial Aid Awards	Financial Aid	5 years after graduation or last attendance	No
Financial Aid Credits & Student Payments	Financial Aid	5 years after graduation or last attendance	No
Lender's Name and Address	Financial Aid	5 years after graduation or last attendance	No
FFEL and Direct Loans Repayment History and Borrower Loan Documentation	Financial Aid	5 years after graduation or last attendance	No
Perkins Loan Documentation	Business Office	Repayment records: 5 years after date loan is assigned, cancelled, or repaid Original promissory note: Until loan is satisfied, or documents are needed to enforce obligation	No
Fundraising Records			
Trusts/Bequests	University Advancement	Permanent	No
Gift Instruments	University Advancement	Permanent	No
Scholarship Agreements	University Advancement	Permanent	No
Correspondence with major donors	University Advancement	Permanent	No
Gift Receipts and Deposits	University Advancement	Permanent	No
Donor/Prospect Research Reports	University Advancement	Permanent	No
Stewardship Reports	University Advancement	Permanent	Yes
Database Records (alumni, donor, prospect, contact reports)	University Advancement	Permanent	No
Campaign Committee Meeting Materials and Member Information	University Advancement	Permanent	Yes
General – Multiple Offices (This			

Category	Data Owner	Retention period	Archival Record?
category applies only to the extent not covered by other, more specific categories above)			
Correspondence, General General inter/intra and non-institutional office communication that deals with the operation of a campus unit and its personnel. This communication can be in the form of notes, memorandums, or letters that have no historical, long-term value.	Varies	Until no longer needed for operational purposes	No
Correspondence, Official Communication that documents the planning, implementation, and evaluation of the major activities, functions, projects, and programs of the office. This communication has historical, long-term value.	Varies	3 years, then evaluate for transfer to the University Archives	Yes
Institutionally Significant Speeches/Presentations (by administrative heads) Final, official version of the speech or presentation that is filed with the department records.	Varies	Permanent	Yes
Project Records Historically significant records documenting approved department, unit or university-wide projects with broad impact. May include, but not limited to, meeting agendas and minutes, correspondence, project reports, member lists and responsibilities. May be	Varies	5 years from date of completion, then evaluate for transfer to the University Archives	Yes

Category	Data Owner	Retention period	Archival Record?
associated with a task force, work group, team, or established committee.			
Project Records – Not Completed Records documenting unit or enterprise-wide projects that were not completed. May include, but not limited to, meeting agendas and minutes, correspondence, project reports, member lists and responsibilities	Varies	Until no longer needed for operational purposes	No
Institutionally Significant Minutes/Agendas Minutes and Agendas for institutionally significant official meetings, including department committees, faculty meetings, council meetings, university wide meetings.	Varies	3 years then evaluate for transfer to University Archives	Yes
Annual/Summary Reports Includes departments and faculty/council committees and task forces.	Varies	Permanent	Yes
Official College, School, Department and Program Newsletters	Varies	Permanent	Yes
Customer Information relating to student loans or other financial products or services (including account balances, ACH numbers, credit card numbers, social security numbers, tax return information, income and payment histories, credit ratings, driver's license information)	Varies	2 years after the last date the information is used in connection with the provision of a product or service to the relevant individual, unless such information is necessary for business operations or for other legitimate business purposes, or is otherwise required to be retained by law or regulation.	No
Grants			

Category	Data Owner	Retention period	Archival Record?
Quarterly Grant Reconciliations	Controller's Office	7 years past end date of grant	No
Grant Contracts	Controller's Office	7 years past end date of grant	No
Grant Correspondence	Controller's Office	7 years past end date of grant	No
Indirect Cost Rate Negotiated Agreement	Controller's Office	7 years past expiration of agreement	No
Litigation and Legal Matters Records			
Legal Complaints, Settlement Agreements, and Litigation Files	Office of General Counsel	10 years following settlement or final disposition	No
Agency Charges, Notices of Complaints, and Resolution Agreements (EEOC, MDHR, Wage & Hour, OFC)	Office of General Counsel	10 years following settlement or resolution	No
Personnel Records of Parties to Litigation or Other Legal Matters	Human Resources	8 years after employment ends (for employment-related litigation) or following closure of matter, whichever is longer	No
Drafts of Documents Superseded by Final Version	Office of General Counsel	Do not retain	No
Other Records Relevant to Litigation or Other Legal Matters	Office of General Counsel	As determined by Office of General Counsel	No
Marketing and Brand Management Records			
Trademarks, logos and service marks	Marketing, Insights, and Communications ("MIC")	Permanent	Yes
Official University-produced Photographs	MIC	Permanent	Yes
Official University-produced Videos	MIC	Permanent	Yes
Payroll Records			
Payroll Deductions	Payroll Department	8 Years	No

Category	Data Owner	Retention period	Archival Record?
Time Cards or Sheets	Payroll Department	8 years	No
W-2 Form	Payroll Department	8 years	No
W-4 Form	Payroll Department	8 years	No
Garnishments	Payroll Department	8 years	No
Policies			
Faculty Handbook	Provost's Office	Permanent	Yes
Institutional, Employee, Staff and Academic Policies	Office of General Counsel	Permanent	Yes
Unit Policies	Implementing Unit	Until superseded or withdrawn	No
Public Safety and Parking Records			
Clery Act Compliance Records and Campus Crime Data	Public Safety	7 years	No
Campus Crime Reports	Public Safety	10 Years	No
Incident Reports	Public Safety	7 years	No
Parking Citation Reports	Transportation and Parking Services	7 years	No
Risk Management Records			
Insurance Policies	AVP for Procurement Services	Permanent	No
Non-Litigated Claims	AVP for Procurement Services	7 years following last activity	No
Risk Management Correspondence	AVP for Procurement Services	7 years following last activity	No
Driver Certification Records	Transportation and Parking Services	6 years	No
Student Academic Records			

Category	Data Owner	Retention period	Archival Record?
Course Drop / Add Records	Student Data and Registrar's Office	2 full semesters after submission	No
Pass / Fail Requests	Student Data and Registrar's Office	2 full semesters after submission	No
Class Schedules	Student Data and Registrar's Office	2 full semesters after submission	No
Registration Forms	Student Data and Registrar's Office	2 full semesters after submission	No
University Transcripts	Student Data and Registrar's Office	Permanent	No
Transcript Requests	Student Data and Registrar's Office	1 year after submission	No
FERPA Requests to Registrar	Student Data and Registrar's Office	Permanent	No
FERPA Disclosure Consent Forms held by Registrar	Student Data and Registrar's Office	Permanent	No
Academic Records Other than Transcripts	Student Data and Registrar's Office	Permanent	No
Advance Placement Credit Documentation	Student Data and Registrar's Office	5 years after graduation or last attendance	No
Application for Graduation	Student Data and Registrar's Office	1 year after graduation or last attendance	No
Foreign Student (I-20) Forms	International Student Services	7 years after graduation or last attendance	No
Date of Graduation and Degree Award	Student Data and Registrar's Office	Permanent	No
Degree Audit Records	Student Data and Registrar's Office	5 years after graduation or last attendance	No

Category	Data Owner	Retention period	Archival Record?
Personal Data Forms	Student Data and Registrar's Office	1 year after graduation or last attendance	No
Transfer Credit Evaluations	Student Data and Registrar's Office	5 years after graduation or last attendance	No
Name Change Authorizations	Student Data and Registrar's Office	5 years after graduation or last attendance	No
Tests	Academic Departments	1 year following end of course	No
Homework	Academic Departments	1 year following end of course	No
Papers / Essays	Academic Departments	1 year following end of course	No
Final Exams	Academic Departments	1 year following end of course	No
Grade Calculations	Academic Departments	2 years following end of course	No
Syllabi	Academic Departments	7 years following end of course	No
Student Club and Organization Records, Including But Not Limited to Undergraduate Student Government			
Membership Lists	Relevant Club	1 year	Yes
Meeting Minutes	Relevant Club	1 year	Yes
Student Conduct Records			
Student Conduct Records (non-Title IX)	Dean of Students	7 years after graduation or date of last attendance, unless otherwise determined by Dean of Students	No
Student Conduct Records (Title IX)	Title IX Coordinator	7 years after graduation or date of last attendance, unless otherwise determined by Dean of Students	No
Student Housing Records			
Individual On-Campus Student Housing Files (including license agreements, room	Residence Life	7 years	No

Category	Data Owner	Retention period	Archival Record?
changes, applications, requests for release, withdrawals)			
Treasury and Investment Records			
Bond Issuance Documents, Offering Memoranda and Agreements	AVP of Finance & Controller	3 years after the final redemption date of the bonds	No
CEFA Compliance Documents	Chief Investment and Treasury Officer	7 years	No
SWAP Agreements	AVP of Finance & Controller	3 years after the final redemption date of the bonds	No
Arbitrage Documents	AVP of Finance & Controller	7 years or as long as the strategy is implemented in the portfolio, whichever is longer	No
Securities Transaction Confirmations	Chief Investment and Treasury Officer	7 years or as long as the strategy is implemented in the portfolio, whichever is longer	No
Investment Reports	Chief Investment and Treasury Officer	20 years	No
University Publications			
Institutional Newspapers/Newsletters	MIC	Permanent	Yes
Student Directories	Student Data and Registrar's Office	Until superseded/updated	No
Employee Directories	Human Resources	Until superseded/updated	No