



Record Retention Policy

Effective May 1, 2023
Information Technology
University of Indianapolis

1.0 Objective

The objective of this Record Retention Policy is to ensure that the University of Indianapolis complies with all applicable laws and regulations governing the management, retention, and destruction of the university's records. Because the university does not have a centralized records management function, each department is responsible for the retention and disposal of the records it generates.

In certain cases, it is a crime to destroy records.

2.0 Scope

For purposes of this Policy, the term "record" refers to any recorded information, wherever such information is or may be stored, that has been created by or for the university, or received by the university in connection with the transaction of the university's business that is in any format (including, without limitation, paper, electronic, and audiovisual materials).

For purposes of this Policy, the term "Record" does not refer to research or teaching materials or any materials collected for personal use.

3.0 Records Retention

The university has determined that for statute of limitations or other reasons, certain records must be retained for specific periods of time. The attached record retention schedule provides the minimum retention periods under this Policy for a variety of categories of documents. Document types that are not listed, but are substantially similar to those listed on the schedule should also be retained for the appropriate minimum retention periods. Records may be retained in print or electronic form. Portable document format ("pdf"), faxed or scanned

documents satisfy record retention requirements, provided that the authenticity of the original is not reasonably expected to be called into question.

The university's General Counsel serves as the university's Records Management Officer. The Records Management Officer is responsible for overseeing the implementation of, and compliance with, this Policy. Each department may adopt additional record retention policies so long as the Records Management Officer approves of the additional policies and the minimum retention periods are at least as long as the retention periods set forth on the attached schedule. Each employee is responsible for maintaining the records that they originate or receive in accordance with this Policy, note that email correspondence is automatically archived for discovery purposes. Employees who are unsure about the need to keep a particular document should consult with the Records Management Officer.

The Records Management Officer shall make periodic reviews of the document retention mechanisms and storage capabilities of the university to ensure the proper maintenance, storage and back-up of the university's records.

4.0 No Destruction of Records: Litigation and Investigation

No records of any type that may be related to an ongoing or imminent university investigation or disciplinary process, lawsuit, or government investigation shall be destroyed and all ordinary disposal or alteration of records pertaining to the subjects of the litigation or investigation shall be immediately suspended.

In certain cases, the Records Management Officer will instruct employees to retain records indefinitely pending an investigation, disciplinary process, or lawsuit. Employees who become aware of a legal matter (whether pending or threatened) involving the university should promptly notify the Records Management Officer so that the university can ensure the preservation of all records relating to that matter. If an employee is uncertain whether documents under their control should be preserved because they might relate to a university investigation or disciplinary process, lawsuit, or government investigation, they should contact the Records Management Officer.

Failure to comply with this Policy, including interference with the retention or destruction of the university's records, may result in civil and criminal liability, as well as disciplinary action, up to and including termination.

Failure to maintain certain records may subject the university and/or individuals to penalties and fines and may compromise the university's position in litigation or an investigation.

It is also a federal crime, punishable by a fine and up to 20 years in prison, to knowingly alter, destroy, mutilate, conceal, cover up, falsify or make a false entry in any record with the intent to impede, obstruct or influence the investigation or proper administration of a government investigation or proceeding.

5.0 Secure Destruction of Information

Records must be destroyed within two years after the last date the information is used in connection with recruitment, admission, financial aid, etc, unless such information is necessary for business operations or for other legitimate business purposes, is otherwise required to be retained by law or regulation, or where targeted disposal is not reasonably feasible due to the manner in which the information is maintained.

Sensitive information such as personally identifiable information, academic records, and health records must be destroyed securely when no longer required in accordance with this policy.

Physical documents containing sensitive information should be destroyed by using a cross cut shredder or deposited into the shred bins throughout the University. Sensitive information stored electronically should be destroyed with the appropriate software for overwriting electronic data, disk degaussing technology or through other means of physical destruction where the information cannot be practically read or reconstructed.

Appendix A - Record Retention Schedule

Document Type	Minimum Required Retention Period
Admissions Applications – non-matriculating applicants	3 years
Complaints and investigations	While active plus 7 years
Contracts, notes, and leases (still in effect)	Permanently
Contracts, notes, and leases (expired)	7 years
Copyright registrations	Permanently
Correspondence (general)	2 years
Correspondence (legal and important matters)	Permanently
Deeds, mortgages, bills of sale	Permanently
Donor records	7 years
Employee files, including employment applications for individuals hired	While active plus 7 years
Employee OSHA exposure medical records	While active plus 30 years
Employment applications, if not hired	3 years
Employment tax records	7 years
Gift records, agreements, award letters, fundraising campaign literature	Permanently
Governance: minute books, bylaws, charters, articles of organization, and policies	Permanently
Insurance policies (expired)	3 years

Document Type	Minimum Required Retention Period
Insurance records, current accident reports, claims, policies	Permanently
Internal audit reports	3 years
Internal Revenue Service exemption application and determination letter, examination rulings, and comments	Permanently
Litigation-related documents	Permanently
Retirement 403(b) allocation records	Termination + 4 years
State tax exemptions	Permanently
Student Counseling Center records	Permanently
Student Records (Course Grades, enrollment, degrees awarded, etc)	Permanently
Student Course Records (Records on grades, examination papers not returned, etc.)	6 months
Tax returns, worksheets, information returns, and related records	Permanently
Trademark registrations	Permanently