

# Bryn Mawr College Records Management Policy

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## I. Introduction

As technology allows for the creation of even more records, it is important for College employees to understand their role in the creation and disposition—through destruction or archiving—of records so we can both meet legal and fiscal recordkeeping requirements and ensure the preservation of records with enduring historical or administrative value. The Bryn Mawr College Archives acts as the final repository for the historical analog and digital records of Bryn Mawr from its founding in 1885 to the present day, as well as provides leadership and expertise in critical engagement with Bryn Mawr history and the management of the College's records in all formats.

### a. What is Records Management?

Records management is the systematic control of records throughout their life cycle, from creation to disposition by destruction or archiving. Through the control of records, the College is able to obtain information about important departmental business activities while disposing of materials and information that are no longer needed.

Records exist in many forms and are defined by their content, not format, and can be paper, electronic, audio/visual, or any other method of recording and retrieving information.

## II. Records Transfer & Selection

Records produced by the offices and departments of Bryn Mawr College may only be transferred to the College Archives once those records are past their period of active use. Office and departmental records that have been transferred to the College Archives cannot be recalled, and are subject to the same terms of use and reproduction as other collections stewarded by the Bryn Mawr College Archives and Special Collections. Additionally, materials noted as permanent in the Record Retention Policy may be the sole responsibility of the office of origin rather than housed in the College Archives.

The College Archives will not accept significantly duplicated materials. It will be the prerogative of the College Archivist or the Director of Special Collections to de-select materials deemed no longer appropriate within these guidelines and the department's Collection Development Policy. Records transferred to the College Archives that do not fit its mission will be disposed of.

### a. How do we transfer records to the College Archives?

Departments that wish to transfer records to the College Archives should contact the College Archivist via email or phone to discuss the transfer of records to the College Archives.

Following the Records Management Policy, not all permanent records will be transferred to the College Archives. Only records listed in section C of the Retention Schedule will be transferred to the archives. These records will only be transferred when they are no longer in active use.

After the College Archives are notified, the archivist will prepare for the impending transfer. Departments can obtain suitable file boxes from the College Archives. Transferred files should be accompanied by a typed inventory of files contained in each box. Departments should retain a copy for office reference. Schedule a file box pick up with Facilities to move the box or boxes from your department to the College Archives.

### b. What about records not listed in the Retention Schedule?

Some records not listed on the Retention Schedule may be important to preserve because of their potential historical value. If your department has records you think may fall into this category, please contact the College Archivist to arrange a meeting.

Examples of records not listed in the retention schedule which the archives might be interested in:

- All publications, newsletters, booklets, memoranda, and other media distributed in the name of Bryn Mawr College including, but not limited to: catalogs, calendars, bulletins, yearbooks, student publications, faculty/staff/administration newsletters, alumnae/-i publications, and major websites of the College

- Photographic prints, negatives, slide, film, tapes, reels, oral history interviews, and other media (including digital) documenting the College.

- Documentation of student life at Bryn Mawr College, especially those which reflect the diversity of histories of the College, and of student organizations

- Documentation of significant events and celebrations

- Maps, prints, and architectural renderings that depict the development of the College

- Artifacts relating to the history of Bryn Mawr College

### III. Retention & Disposal

Records shall be retained only during their period of use, unless longer retention is required as reflected below, or the records are needed for departmental reference or for historical/archival reasons. Records which are no longer needed for ongoing departmental business or as reflected below shall be systematically and regularly destroyed or discarded according to disposal guidelines (Section V). Please note that this retention schedule is superseded by any document preservation notice issued in connection with a litigation hold, as laid out below in Section III (d).

Questions about the implementation of the record retention schedule should be addressed to the College Archivist.

#### Alumnae/i Relations and Development Records

| Type of Record                                    | Retention Period                               |
|---|--|
| Alumnae Association Biofiles (deceased alumnae/i) | Permanent; transferred to the College Archives |
| Donor Files                                       | 3 years after death of donor                   |

#### College Administrative and Departmental Records

| Type of Record                       | Retention Period   |
|--------------------------------------|--|
| Accreditation Records                | Permanent  |
| Appointment Books, Office Logs, etc. | 2 years or at departmental discretion                                    |
| Bylaws, Charters, Minute Books       | Permanent; housed with originating department unless otherwise indicated |

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Librarian's Office/Office of the CIO Files

Permanent; transfer to archives after 2 years

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| I-9 Forms   | The later of: (a) 3 years after date of hire, or (b) 1 year after employee is terminated |
| Injury and Illness Incident Reports and Related OSHA Forms/Logs | 6 years following the end of the calendar year the records cover                         |
| Payroll/Wage Records <sup>5</sup>                               | 4 years  |
| Pension Plan/Retirement Records                                 | Permanent  |
| Personnel Files <sup>6</sup>                                    | Duration of employment plus 7 years  |
| Recruitment and Search Records <sup>7</sup>                     | 5 years from date job search closed  |
| Workers' Compensation Records                                   | Duration of benefits period + 4 years  |
| Workplace Injury Records  | 4 years from date of injury  |

Facilities, Environmental, and Equipment Records

| Type of Record  | Retention Period  |
|---|---|
| Asbestos Records (abatement, claims, etc.)                              | 30 years  |
| Building plans and specifications                                       | Life of building; transfer to archives after building destruction |
| Fire, Internal Disaster, and Evacuation Plans                           | 4 years   |
| Hazardous or Toxic Waste Disposal or Abatement Records (manifest, etc.) | 30 years  |
| Insurance Policies  | Duration of policy + 25 years                                     |
| Inventories of Hazardous and/or Toxic Chemicals                         | Current only  |
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| Material hoists, personnel hoists, and elevator standards and certification records   | 4 years  |
| Material Safety Data Sheets (MSDS)  | 30 years   |
| Mechanical and Electrical Equipment Check Records   | 4 years  |
| Operational manuals   | Life of building   |
| Records of Fire Department Inspections  | 4 years  |
| Records of Required Testing of Fire Protection and Other Safety Equipment   | 4 years  |
| EHS Program documentation – Internal EHS program documents, policies, procedures, guidelines  | Until superseded or outdated + 1 year  |
| Employee Training Records and Sign-in Sheets  | End of calendar year in which course ends or separation of employment + 30 years |
| Environmental Health and Safety Inspections and Audits  | End of calendar year which audit was completed +7 years                          |
| Environmental Spill and Emergency Plans<br><b>25 Pa. Code 262a. 100</b>   | Until superseded or outdated +5years   |
| Equipment Calibration and Testing Records – Non-Radioactive   | Decommissioning of equipment + 30 years  |
| Equipment Calibration, Testing Records, and Equipment Inventories –Radioactive  | Expiration of license + 3 years  |
| Equipment Testing Records (eyewash and showers)   | Life of process + 3 years  |
| Federal and State Special Forms of Permits, Approvals, and Registrations and Submissions<br><b>25 PA Section 270a.60(a)(1), 40 CFR 264.74, 49 CFR 107.705, 49 CFR 173.185</b> | Expiration of permit + 3 years   |
| Hazardous, Infectious, and Radioactive Waste – Shipping and Disposal Records  | Permanent  |
| Hazardous Materials – Shipping & Receiving Records<br><b>40 CFR Section 262.40; Section 101 ESIGN Act</b>   | End of calendar year + 3 years   |
| Radioactive License and Amendment Records, Radioactive Material Surveys, and Radioactive Material Records<br><b>U.S. NRC 36.81</b>  | Expiration of License + 3 years  |
| Chemical waste area and pesticide storage area inspections<br><b>PA Department of Ag (PDA) Pesticide and Regulations 7 Pa. Code, Chapter 128 Sections 35 and 6</b>            | End of calendar year + 3 years   |

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| Equipment and confined space inventories  | Until superseded               |
| Pesticide Application Records<br><b>PA Department of Ag (PDA) Pesticide and Regulations 7 Pa. Code, Chapter 128 Sections 35 and 6</b> | Date of application + 3 years  |
| Refrigerant records and Refrigerant Technician Certification<br><b>40 CFR Part 82, Subpart F §82.154</b>                              | End of calendar year + 3 years |

Finance

| Type of Record                     | Retention Period                              |
|------------------------------------|---|
| Accounts Payable                   | Current year plus 7 years                     |
| Accounts Receivable                | 7 years from the receipt of payment/write-off |
| Annuity Gift Agreement (expired)   | Current year plus 7 years                     |
| Audit Work Papers                  | Conclusion of audit plus 7 years              |
| Bank Records                       | Current year plus 7 years                     |
| Budget Records (departmental)      | Current year plus 7 years                     |
| Bills (paid) (departmental copies) | Current year plus 7 years                     |
| Bequests                           | Permanent                                     |
| Cash Receipts and Disbursements    | Current year plus 7 years                     |
| Checks                             | Current year plus 7 years                     |
| Credit Card Records                | Current year plus 7 years                     |
| Deeds and Titles                   | Permanent                                     |
| Deposit Slips                      | Current year plus 7 years                     |
| Endowment Records                  | Permanent                                     |
| Gifts to the College               | Current year plus 7 years                     |
| Gifts to the Library               | Permanent                                     |
| Mortgages, Leases, Notes (expired) | Current year plus 7 years                     |
| Purchase Orders                    | Current year plus 7 years                     |
| Sales Records                      | Current year plus 7 years                     |
| Stock Transactions                 | Current year plus 7 years                     |
| Tax Records/Corporate              | Permanent                                     |
| Tax Records/Employee (federal)     | Current year plus 7 years                     |
| Tax Records/Employee (state)       | Current year plus 7 years                     |

Academic/Student Records

| Type of Record  | Retention Period          |
|---|---------------------------|
| Career & Civic Engagement Center Student Credential Files | Current year plus 7 years |



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| Deans' Office Student Files | Permanent; transfer to the College Archives<br>2 years after graduation or date of last attendance |
| Financial Aid Student Files | 2 or 3 years from date of graduation or last attendance  |

## IV. Confidentiality & Privacy

The Bryn Mawr College Archives recognizes the rights of faculty, students, alumnae/-i, and other donors to impose reasonable restrictions to protect privacy. Records that contain sensitive personal information or other forms of protected information are restricted as outlined below:

Student educational records (including grades and letters of recommendation) are governed by the Family Educational Rights and Privacy Act (FERPA) of 1974, as amended, and are restricted for seventy-five years from the date of creation.

Personnel records relating to Bryn Mawr faculty and staff (including search, review, promotion, tenure, and disciplinary/grievance records) are restricted for seventy-five years from the date of creation.

Records of the Board of Trustees and its committees (including meeting minutes and correspondence) are restricted for twenty-five years from the date of creation.

Records of the President's Office are restricted for twenty-five years from the date of creation.

Financial records and records relating to donors and donations are closed for twenty-five years from the date of creation.

Medical records, patient/client files, and any sensitive, personally identifiable information (including social security numbers, bank account numbers, and credit card numbers) are permanently restricted and may be marked for deaccession or redaction at the discretion of the College Archivist or in compliance with Bryn Mawr College's Data Handling Policies.

Records of the above types, even where located in otherwise unrestricted collections, are still considered closed following the same policies.

## V. Disposal Guidelines

Records that have reached the end of their use period according to the Retention Schedule and are not subject to a hold for legal or audit purposes should be destroyed in a timely manner, according to disposal guidelines.

To dispose of records listed on the retention schedule, offices and departments should:

- Calculate the retention period of the record and ensure it is at its end of life and out of active use within the department

- Document the date and types of records that were destroyed and send this information to the College Archivist

- Ensure that records which contain confidential information, personally identifiable information, or any information covered by FERPA is securely destroyed by shredding, confidential recycling, or secure electronic destruction

Anticipated or current litigation, audit, government investigation, or other similar matters will suspend the normal disposition of records.

If you have any questions about records disposal, please contact the College Archivist.

## I. Glossary

Definitions taken from the Society of American Archivists<sup>8</sup> and National Archives and Records Administration<sup>9</sup> glossaries.

**Active record:**

