

I. Purpose

In today's work environment, employees create and maintain an increasing number of records, and an ever larger percentage of these records are being created and maintained using computers, in particular e-mail systems. Electronic records, including e-mails, must be managed to the same extent as traditional records to ensure compliance with applicable laws and to preserve institutional history. Moreover, electronic records and e-mails are like traditional records in that they can be shared with unintended parties and must be disclosed during discovery. Accordingly, when creating an e-mail, one should consider carefully what he or she says in the e-mail and how it is said, just as if he or she were creating a hard copy, especially as an e-mail, unlike a hard copy, is not readily subject to being destroyed.

This policy is intended to facilitate the establishment of reasonable record retention programs for all university records, including which records should be retained and for how long, so as to ensure that university records are maintained in accordance with all applicable legal and policy requirements while providing for the efficient and effective use of the university's limited storage capacity.

Any questions regarding the application of this Policy to a specific record or e-mail should be addressed to the General Counsel's Office.

II. Scope

This policy applies to all IIT employees. It covers all university records (meaning all books, papers, digitized electronic material, maps, photographs, databases, or other official documentary materials, regardless of physical form or characteristics) that meet the following criteria:

1. are final versions;
2. are made or received by a department in the transaction of university business; and
3. are preserved or appropriate for preservation as evidence of the organization, function, policies, decisions, procedures, operations or other activities of the university or because of the informational data contained therein.

III. Policy

A. *General.* The heads of all university departments shall ensure that records are preserved, retained and disposed of in accordance with this Policy and the time periods specified in [Appendix A](#) hereto. Records should be stored and secured in a manner that is reasonable and appropriate given the nature of the records, giving due consideration to

whether records contain personal or sensitive information, the frequency with which the record will need to be retrieved, the value of the record and the costs that would arise from the record being lost or damaged. The head of a department may develop a department specific record retention policy that supplements this Policy, provided that such supplemental policy is consistent with the provisions of this Policy and is filed with the Office of General Counsel.

B. Specifics. With respect to preserving, retaining and disposing of records, the head of each department shall ensure compliance with the following requirements:

1. Records should be preserved in a secure manner that allows for their reasonable recall and be retained in accordance with all laws that may be applicable to each specific record. Laws to consider include, but are not limited to, the Internal Revenue Code, the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA), the Occupational Safety and Health Act (OSHA), the Illinois Wage Payment and Collection Act and relevant federal and state environmental statutes.
2. Records should be disposed of upon the expiration of any retention period required by law, the retention period provided for by Appendix A hereto or any department-specific supplemental record retention policy, whichever is last to occur, and the following procedures should be followed in disposing of records:
 - a. Verify that the disposal of the records does not violate any statutory, contractual or accreditation obligations;
 - b. Confirm that the records to be disposed of do not relate to or contain information regarding actual or threatened litigation, as such records are subject to Section B(5);
 - c. Give due consideration to whether the records may be of value to the IIT Archives; and
 - d. Ensure that records which contain student information or sensitive and/or confidential information are shredded or otherwise rendered unreadable prior to disposal.
3. Work-related e-mail is a record, and it must be treated as such. Each e-mail user must take responsibility for sorting out personal messages from work-related messages, and all work-related messages must be preserved, retained and disposed of as required by this Policy and its Appendix A and any department-specific supplemental record retention policy. Spam should be disposed of immediately, and any personal e-mails should be disposed of in a timely manner so that university servers are not unduly burdened. Work related e-mails that do not fall under one of the topics provided for in Appendix A are not required to be maintained for a prescribed period of time and should be disposed of when no longer needed.

4. In general, university servers are not intended for long-term record retention, and any electronic record that is required to be retained beyond three (3) years should be printed out and filed in similar fashion to paper records or transferred to a CD or other such format and appropriately stored. E-mails messages should be kept with any attachment(s), and the printed copy of the e-mail should contain the following header information:
 - a. Who sent the message,
 - b. To whom the message was sent,
 - c. The date and time that the message was sent, and
 - d. The subject of the message.

5. In the event of actual or threatened litigation against IIT or one of its employees, the law imposes a duty upon IIT to preserve all documents and records pertinent to the litigation. In the event or upon the threat of litigation, the General Counsel's Office will send individuals potentially affected by the litigation an e-mail (comparable to the text set forth in Appendix B) instructing them to preserve any relevant records until further notice, even though such preservation would otherwise no longer be required under this Policy.

C. Policy Publication. The head of each department should take reasonable steps to ensure that his or her employees are aware of this Policy (and any department-specific supplemental record retention policy), including, but not limited to, informing, either orally or in writing, his or her employees of this Policy and referencing it on his or her department's webpage.

D. Former Employees. When an employee leaves a department or the university, the employee's immediate supervisor is responsible for ensuring that any records, including electronic records and e-mails, in the separating employee's possession are properly maintained and retained and that responsibility for these records is transferred to an appropriate person. Further, the supervisor is responsible for contacting the Office of Technology Services to arrange for the transfer of the employee's electronic records as needed before accounts are deleted.

APPENDIX A

RETENTION PERIOD FOR RECORDS

The Responsible Department is the department responsible for ensuring that all records applicable to the particular category are preserved, retained and disposed of in accordance with this Policy. The head of the Responsible Department (or his or her designee) should take all necessary steps, including coordinating with other departments, as needed to meet these obligations, which may include coordination with the IIT Archives. Nothing in this Policy is intended to prohibit a Responsible Department from providing back-up copies of a record to another department.

As this Policy is intended to apply across the university, a Responsible Department may wish to adopt a department-specific record retention policy, in accordance with Section III.A, in order to clarify its obligations.

<u>RETENTION PERIOD FOR RECORDS INDEX</u>	<u>PAGE NO.</u>
Academic and Education Related Records	5
Administrative Policies, Procedures and Reports	5
Advancement	
Alumni	6
Corporate & Foundations	6
Development	6
Special Events	6
Affirmative Action / Employment / Equal Opportunity	6
Board of Trustees	7
Contracts	7
Environmental Health & Safety	8
Faculty Council	9
Finance Matters	
Accounting	9
Payroll	9
Purchasing	10
Tax-Related Documents	10
Health Records	10
Human Resources	
Employment Records	10
Union Organizing	11
Welfare Benefit Related Documents	11
Insurance	11
Intellectual Property	11
Legal	12
Public Safety Records	12
Real Estate	12
Regulatory Records	13
Sponsored Research	13
Student Life Records	13

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Academic-Related Records	
Admissions records	Enrolled student: 2 years from graduation or date of last attendance – appropriate Admission Office or Professional School Non-enrolled student: 1 year – appropriate Admission Office or Professional School
Grade records	Permanent – Registrar’s Office
Graded exams	Faculty Member – 60 days after the date class grades are reported to the Registrar’s Office
Career planning and placement	2 years after last date of services – Career Development Center
Class schedules	Permanent – Registrar’s Office
College catalog	Permanent – Office of Educational Services
Commencement lists and programs	Permanent – Registrar’s Office
Degree audit records	Permanent – Office of Educational Services for Undergraduate Students and Graduate College for Graduate Students
Enrollment statistics	Permanent – Office of Institutional Information
Financial aid records other than student loans	5 years after student date of last attendance – Office of Financial Aid
Financial aid records related to student loans	3 years after the loan has been paid in full – Office of Financial Aid
International student forms and visas	5 years after graduation or date of last attendance – International Center
Official undergraduate academic files	5 years after graduation or date of last attendance – Office of Educational Services
Official graduate academic files	5 years after graduation or date of last attendance – Graduate College
Departmental academic files	1 year after graduation or date of last attendance – Applicable Department
Transcripts requests	1 year from date of request – Registrar’s Office
Tuition and fees charges and schedules	6 years – Bursar’s Office
Administrative Policies, Procedures and Reports	
Departmental reports and files	3 years – Applicable Department
Reports of university-sanctioned or school-sanctioned committees	Permanent – Applicable Department
Faculty Handbook, Procedures Manual, Safety Policies & Procedures	Permanent – General Counsel’s Office

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Human Resources Policies & Procedures	Permanent – Human Resources Department
Student Handbook	Permanent – Dean of Students’ Office
Accounting Manual	Permanent – Accounting Department
Purchasing Policies	Permanent – Purchasing Department
Other handbooks, manuals and policies	Permanent – Applicable Department
	Note: The most up-to-date version must be permanently kept by the applicable department. Older versions, whether whole or parts, should be kept for a period of 4 years from the date that the newest version takes effect.
Handbooks and policies & procedures (Older Versions)	4 years -- Applicable Department
Publications, articles, information about faculty, staff and students	Applicable Department until no longer needed then Archives
Publicity materials, press releases, publications and reports	Communication & Marketing until no longer needed then Archives
Advancement	
Alumni	
Alumni biographical files	Institutional Advancement until no longer needed then Archives
Reunion class files	Institutional Advancement until no longer needed then Archives
Corporate & Foundations	
Donor files (hard copy)	6 years – Institutional Advancement
Donor files (electronic)	Permanent – Institutional Advancement
Development	
Donor files (hard copy)	6 years – Institutional Advancement
Donor files (electronic)	Permanent – Institutional Advancement
Planned giving	Permanent – Institutional Advancement
Gift processing information	Permanent – Institutional Advancement
Special Events	
Files on university events	As needed – Institutional Advancement
Official university-related special events: summary list of events, speakers and dates; memorabilia of special dinners, building openings; comparable material	Institutional Advancement until no longer needed then Archives

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Affirmative Action / Employment Equal Opportunity	
Presidential search records	Permanent – General Counsel’s Office
Academic searches, reviews, including self-evaluations, promotions and employment records, including documents related to such matters and decisions	3 years – Provost’s Office should maintain such records for deans, the applicable dean’s office should maintain such records for chairs, and the applicable chair’s office should maintain such records for faculty members Note: All academic appointment letters are to be maintained by the Provost’s Office; all other employment records, including benefits records, are to be maintained by HR.
Affirmative action programs	Permanent – General Counsel’s Office
Documents supporting non-academic search and employment records	3 years from effective date of decision – Human Resources Department
Federal and state required statistics and reports	6 years – General Counsel’s Office
Sexual harassment, Title VI, Title IX, ADA and Rehabilitation Act complaints, investigations, findings and requests for accommodations	No action or cause finding: 3 years – General Counsel’s Office Action or cause findings: Permanent – General Counsel’s Office
Grievances – academic and non-academic	No action or cause finding: 4 years – Appropriate Department Action or cause findings: Permanent – Appropriate Department
Board of Trustees	
Proceedings of the trustee board and committees, including, but not limited to, minutes, bylaws and resolutions	Permanent – General Counsel’s Office
Articles of Incorporation	Permanent – General Counsel’s Office
Contracts	
Design and construction contracts	6 years after completion of construction – Design and Construction Department
Leases of more than a year with third parties (except student housing leases)	10 years after expiration – Rental Property Management Department or Campus Reservation Office, as applicable
Leases of less than a year with third parties (except student housing leases)	4 years after expiration – Rental Property Management Department or Campus Reservation Office, as applicable

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Reservations of classrooms and other building spaces to university-related parties, including student groups	2 years after expiration – Campus Reservation Office or Registrar’s Office, as applicable
Student Housing Leases	7 years after expiration – Housing Department
Other contracts (except related to sponsored research, intellectual property or real estate – see relevant listing)	10 years after termination
Equipment warranties	Life of equipment – Applicable Department
Environmental Health & Safety	
Records of inventory, use and control of radioactive materials	30 years – Facilities Department
General/industrial hygiene sampling records	5 years – Facilities Department
Air quality sampling records	5 years – Facilities Department
Chemical inventories, including material safety data sheets	30 years after end of year or end of use of chemical – Facilities Department
Fire and evacuation drill records	4 years – Facilities Department
Fire protection system records and testing	5 years – Facilities Department Note: Records related to periodic testing of portable extinguishers need only be kept as long as such equipment is in use
Hood testing records	3 years – Facilities Department
Hazardous or toxic waste generation records and disposal manifests and records	5 years – Facilities Department
Material and personnel hoists and elevator standards and certification records	4 years – Facilities Department
Records of inspection, performance, exercising period and repairs of emergency power equipment	4 years – Facilities Department
Mechanical and electrical equipment testing and checks	4 years – Facilities Department
Various safety training records	3 years – Facilities Department
Internal safety inspections	3 years after last inspection or corrective action taken, whichever is longer – Facilities Department
OSHA required records relating to occupational injury or illness	5 years – Facilities Department
Employee exposure to hazardous substances, asbestos, blood borne pathogens and the like and related reports and medical records	Duration of the employee’s employment plus 30 years – Facilities Department Note: If an exposure, this time period trumps any other retention period.

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Faculty Council	
Proceedings of the Faculty Council and its committees, including, but not limited to, minutes, by-laws and resolutions	Permanent – Provost’s Office
Finance Matters	
Accounting	
Account reconciliations (balance sheet)	7 years – Controller’s Office
Original journal or budget entries and supporting documentation	7 years – Controller’s Office
Travel expense reports and supporting documentation	7 years– Controller’s Office
Trial balances	7 Years – Controller’s Office
Audited university financial statements and work papers	Permanent – CFO’s Office
Internal university audit and finance related reports, statements and work papers	7 years – CFO’s Office
Annual approved university budgets	7 years – CFO’s Office
Accounts Payable – invoices, credit card statements, vouchers & supporting information	7 years – Controller’s Office
Banking related records, including loans and letters of credit	7 years – Controller’s Office
Cash receipts	7 years – Controller’s Office
Capital equipment records, including depreciation records	Life of Asset – Controller’s Office Note: Records of equipment purchased with federal funds must be retained for 3 years after disposition
Effort certification	7 years – Controller’s Office
Indirect cost rate calculations	7 years – Controller’s Office
Payroll	
Annual payment records, such as W-2s and alpha and employee transaction lists	Permanent – Payroll Department
Imputed income records	6 years – Payroll Department
Payroll information returns (federal and state)	6 years – Payroll Department
Payroll Deduction Authorization Forms	5 years after end of employment – Payroll Department
Wage assignment orders	5 years after expiration – General Counsel’s Office
Records of payments and deductions	5 years – Payroll Department
Time sheets	3 years – Payroll Department

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Purchasing	
Purchase orders and invoices and supporting information	7 years – Purchasing Department
Tax-Related Documents	
Income tax and informational returns	Permanent – Controller’s Office
Excise and sales tax returns	6 years – Controller’s Office
IRS rulings and determination letters	Permanent – General Counsel’s Office
Health Records	
Student medical and counseling records	7 years after graduation or last visit – Counseling Center and Student Health Center
Student immunization records	60 years – Student Health Center
Employee medical records	Non-Regulatory Required Monitoring: 10 years after separation from university – Appropriate Department Regulatory Required Monitoring: 30 years after separation from university – Appropriate Department (See also Employee Exposure under Environmental Health & Safety)
Athletic injury files	4 years – Athletics’ Department
Human Resources	
Employment Records	
Records, including medical records provided specifically and exclusively for leave-related purposes, relating to leave under family and medical leave act and other leave policies	3 years – Human Resources Department
Personnel files of employees, including, but not limited to, applications, resumes, background checks, in-service and training records, and performance appraisals	5 years after termination – Human Resources Department
Applications of individuals who applied for positions but were not selected for employment	2 years after the relevant employment search has concluded – Human Resources Department
I-9 Forms (non-students)	3 years or 1 year after termination, whichever is greater – Human Resources Department
I-9 Forms (students)	3 years or 1 year after termination, whichever is greater – Payroll Department
Records related to eligibility of foreign national to work in United States	3 years – Human Resources Department
Individual contracts of employment	6 years after termination – Human Resources Department

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Union Related Matters	
Collective bargaining agreements	Permanent – Human Resources Department
Records of activities related to union organization, including attempts that do not result in a contract	7 years from conclusion of contract and any attempts that do not result in a contact – Human Resources Department
Welfare Benefit Related Documents	
Federal reporting requirements, including, but not limited to, Form 5500s	Permanent – Human Resources Department
Plans and plan amendments, including descriptions and related documents	Permanent – Human Resources Department
Retirement benefit related employee records, including, but not limited to, eligibility, personal information, service records and payments	6 years after death of eligible employee or the joint and surviving beneficiary, if applicable – Human Resources Department
Required retirement benefit related notice to participants	6 years after distribution – Human Resources Department
Loan documentation for plan participant loan	3 years after repayment – Human Resources Department
Election notices and documents, including COBRA notices and COBRA-Related election documents	3 years after expiration of coverage period – Human Resources Department
Trust agreements, custodial agreements and third-party administrative agreements	Permanent – Human Resources Department
Insurance	
Insurance policies	6 years after expiration – General Counsel’s Office
Certificates of insurance	6 years after expiration – General Counsel’s Office Note: The Purchasing Department, Downtown Campus and Facilities Department should forward copies of all certificates to the General Counsel’s Office
Insurance claims – non-workers’ compensation	4 years after settlement of claim – General Counsel’s Office
Insurance claims – workers’ compensation	5 years after settlement of claim – Department of Human Resources
Intellectual Property	
Original patent and related work papers	Permanent – General Counsel’s Office
Original copyright and trade mark and related work papers	Permanent – General Counsel’s Office

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Royalty-related records	Life of patent, trademark or copyright plus 5 years – General Counsel’s Office
Assignments	Permanent – General Counsel’s Office
Licensing agreements	6 years after expiration of agreement – General Counsel’s Office Note: The Office of Technology Transfer & Intellectual Property should forward copies of all agreements listed under “Intellectual Property” to the General Counsel’s Office
Legal	
Litigation files	4 years after case is closed – General Counsel’s Office
Final disposition documents, including, but not limited to judgments, releases, settlements, and orders	Permanent – General Counsel’s Office
Authorizations for release of records, subpoenas and the like	3 years – General Counsel’s Office
Conflict of interest forms	3 years – General Counsel’s Office
Public Safety Records	
Incident Reports	10 years for those involving death – Department of Public Safety 5 years for those involving serious injury, a criminal act or property damage or destruction – Department of Public Safety 3 years for all others – Department of Public Safety
Compilation of statistics regarding crimes on campus (Clery Reports)	5 years – Office of Institutional Information
Real Estate	
As-built drawings, specifications, designs, blueprints and maps	Permanent – Design and Construction Department
Property deeds, easements, licenses, rights of ways, rights of first refusal, remainder interests, title reports and mortgages	6 years after property interest terminated or transferred – General Counsel’s Office
Property tax documents	6 years – General Counsel’s Office
Mechanical, engineering and environmental reports	6 years after property interest terminated or building demolition – Design and Construction Department

RECORD CATEGORY	RETENTION SCHEDULE / RESPONSIBLE DEPARTMENT
Regulatory Records	
Accreditation/licensure records	Permanent – Office of the President
Governmental permits, approvals and licenses	3 years after expiration – General Counsel's Office Note: All departments should forward copies of all permits, licenses and approvals to the General Counsel's Office
Records of building and fire department inspections	4 years – Facilities Department
Investigations or audits by regulatory body	Permanent – General Counsel's Office
Required governmental or regulatory reports not otherwise accounted for herein	4 years – Appropriate Department
Sponsored Research	
Grant and contract applications, proposals and supporting documentation (awarded)	3 years after completion of the filing of all close-out documents required by the sponsor or as specified by particular grant or contract requirements – Office of Sponsored Research & Programs and Grant and Contract Accounting, as applicable
Animal welfare records	5 years after completion of research – Office of Research Compliance & Proposal Development
Human subject records	6 years after the research is completed, terminated, withdrawn, cancelled prior to enrollment or otherwise closed – Office of Research Compliance & Proposal Development
Recombinant DNA research records	Permanent – Office of Research Compliance & Proposal Development
Student Life Records	
Disciplinary records	10 years after infraction – Dean of Student's Office
Fraternities and sororities files	Dean of Student's Office until no longer needed then to the Archives
Student groups and organizations files	Dean of Student's Office until no longer needed then to the Archives

APPENDIX B

FORM LETTER REGARDING THE RETENTION OF RECORDS DUE TO LITIGATION

IIT has received a threat of litigation from _____. Accordingly, we are under a legal obligation to maintain all records, including email, that relate to _____. This obligation overrides the University's Policy on Record and E-mail Retention (the "Policy"), or, if applicable, your department's record retention policy. Therefore, do NOT destroy or delete any records you or your unit may have that concern or even mention _____ by name, even if the Policy (or your department's record retention policy) would otherwise permit you to do so. The law requires that you take affirmative steps to preserve this information. The safest way to preserve information that is currently stored in electronic form is to print out a hard copy and maintain it in a file.

Finally, I am required to monitor your compliance with this mandate to preserve "evidence." Please let me know that you have received this email, and what steps you are taking to preserve records relating to the above-referenced matter. At some time in the future, I may need to ask you to transfer those records to me. In the event you separate from the University for any reason during the course of this matter, please notify me so we may ensure retention of your e-mail folder in the server pending resolution of this matter.

Thank you for your assistance. Please contact me if you have any questions or concerns.