

SIMMONS COLLEGE RECORDS RETENTION POLICY STATEMENT:

Simmons College is committed to meeting its administrative, fiscal, legal, and historical obligations through the systematic and consistent management of all records, regardless of medium or format, created and/or maintained by employees of Simmons College in the course of the College's academic and administrative business functions.

The effective management of the College's records will

- meet legal standards for protection, storage, accessibility, and disposition;
- protect the privacy of students, faculty, and staff as required by law;
- ensure optimal and efficient usage of space and other resources;
- promote a culture of clarity and transparency;
- contribute to the documentation of the College's historical records; and
- support the effective governance and management of the College.

This records management policy is designed to ensure compliance with applicable federal and state laws and regulations and industry best practices.

Scope:

This policy applies to College records and information resources in all formats, including but not limited to paper records, electronic records, and information management system data.

This policy applies to all faculty, staff, administrators, and other employees of Simmons College who manage College information resources.

Authority & Responsibilities

The President and senior administrative staff of the College are responsible for communicating this policy to College employees and have general oversight of this policy.

The College Archives is responsible for developing and administering a records management program for the College, and will assist employees in understanding and implementing that program.

The College Archives has the authority and responsibility to determine the appropriate disposition for College records in consultation with necessary faculty, staff, and administrators. The College

Archives has the authority and responsibility to articulate these disposition decisions in records retention schedules.

All employees of Simmons College are responsible for managing and maintaining the records they create and administer in compliance with both this policy and the record management program developed by the College.

Definitions:

Record: Information reflecting College academic, business, and related activities and transactions. Records may exist in any format (paper, electronic, information management system (i.e. Datatel) data, photographic, recordings, etc.). Records are created, received, used, and/or maintained in the course of typical College business operations and may hold operational, legal, fiscal, vital and/or historical value.

Critical / Vital Records: Records determined to contain information essential for the operational continuity of Simmons College following a catastrophic event. The College Archives will work with senior staff and administration at Simmons College to identify vital records and to develop procedures to ensure their accessibility after such an event.

Permanent / Archival Records: Records which are determined to contain historical, administrative, and/or research value to the College and which the College maintains indefinitely. The College Archives is responsible for the identification and transfer of these records, provides for their secure long-term storage, and ensures their accessibility in accordance to established Archives Access Policies.

Active Records: Records that are referred to regularly and/or are needed to support current or ongoing business activities of a department or office. Unless these records have been defined as permanent or archival, they should be destroyed in accordance to the College Records Retention Schedule.

Inactive Records: Records that have not been referenced for at least one year or for which the designated active period has passed. Unless these records have been defined as permanent or archival, they should be destroyed in accordance to the College Records Retention Schedule. If needed, inactive records may be placed in storage with the College Archives until the end of their defined retention period.

Record Copy / Official Copy: The single official copy of a document maintained by an administrative unit. The record copy is usually, but not always, the original and may be held by either the creating office or another office of record. Record Copies are identified in the College Record Retention Schedules, and these materials must be maintained in accordance to existing Record Retention Schedules.

Unofficial Copies: Duplicate copy of an official record created for ease of access and use. Also called “convenience copy” or “working copy,” these materials may be destroyed when no longer needed by the office that holds them.

Non-Records: These informational materials possess a solely operational value for the office which holds them, and should not be maintained by that office after the active use of them has ceased. Such items may be destroyed at any time when no longer needed by the office that holds them. Examples include:

- all duplicate/convenience copies of “Official Records”
- information (whether produced by Simmons College or not) used for reference purposes only
- notes or working drafts of a completed project (unless they provide more complete information than the final report)

Retention Period: Minimum length of time for which a College office or department is responsible for maintaining records. Retention periods are determined through consultation with state and federal law and industry best practices and are to be adhered to by all College employees in the course of their general business activities.

Retention Schedule: An internal document describing categories of records, stating their retention period, and providing instructions for their disposition. The General Records Schedule for Simmons College lists the most common records at the College and provides retention and disposition guidelines.

Disposition of Records: The terminal treatment of records, either through destruction or permanent storage with the College Archives.

Procedures and Guidelines

Records Creation

All College departments and offices must create records that accurately document their core activities and functions.

Records Storage

All College departments and offices must maintain their records in a safe, stable, and secure manner that supports their timely and accurate retrieval and applies appropriate controls on their accessibility. To do this departments and offices should:

- Develop consistent and accurate filing, classification, and/or indexing systems for records—both paper and electronic—that all employees understand and follow. Such systems must enable the efficient finding of appropriate records and need not be complex.
- Store their records in secure and stable environments, including electronic records storage on stable media and in accessible software formats.
- Determine the confidentiality and privacy status of all of their records and ensure that security measures are appropriate to meet the needs of the records.
- Document their records organization system, storage locations, and security procedures in existing policies and procedures.

Records Disposition and Destruction

All departments and offices must know what they need to do with their College records once the records are no longer in active use. Typical disposition of records include:

- confidential destruction;
- transfer to the College Archives for permanent retention;
- transfer to the College Archives Records Management program for short-term storage (in the case of records with a designated retention period, but which are not accessed regularly in on-site offices)

To determine and undertake the appropriate disposition of their records in compliance with the Simmons College Records Policy, departments and offices should:

- Consult the College's records retention schedules to determine the disposition of their records.
- Contact the College Archives (archives@simmons.edu) for assistance in interpreting the records schedules or developing or modifying schedules as needed.

Litigation Hold for College Records

Departments and office must ensure that they *not* destroy College records that are currently part of, or are likely to be part of, any legal action or proceeding, litigation, audit, investigation, or review, even if the records retention schedules or other policies or procedures indicate that the records are eligible for destruction. For more information, contact the Office of General Counsel at kathleen.rogers@simmons.edu.

Electronic Records, E-mail, Web Records, and Datatel Information

Records created, managed, and stored in electronic format constitute the majority of information at Simmons College. While this Records Retention Policy applies to all records, regardless of format, additional detailed information on the management, storage, and disposition of electronic records will be forthcoming.

General Records Retention Schedule

The Simmons College General Records Retention Schedule provides policy statements on the ownership, retention, and disposition of university records, identifying:

- which office or department holds the official copy of records;
- how long such records are to be kept; and
- the ultimate disposition of these records.

This General Records Schedule covers records common to most or several departments and offices at Simmons College. The Records Schedule may be supplemented by department or office-specific records policies as needed.

Translating the schedules into recordkeeping practice may not always be simple. For questions about interpreting or implementing the schedules or creating a department-specific records policy, please contact the College Archives at x2441 or archives@simmons.edu.

Record Types:

The Simmons College General Records Schedule is organized by functional type of record. Not all offices will produce official copies of records in all types.

Many instances of “convenience copies” are noted within the Schedule, but such information is neither exhaustive nor comprehensive.

- **Financial Records:** Investment, budget, and accounting records.
- **Student Records:** Graduate and undergraduate matriculated and non-matriculated student records.
- **Employment Records:** Personnel records, benefits, and payroll records for all employees; includes Faculty Tenure and Promotion records.
- **Academic Program Records:** Records that document teaching and learning, such as course schedules and descriptions, syllabi, reading lists, and courseware objects.
- **Administrative Records:** Includes reports, correspondence, operational records for all offices, departments, units, committees, and working groups, including senior administration.
- **Research Records:** Funded and unfunded grant records and grant and contract accounting records.
- **Advancement Records:** Gift and estate records.
- **Operations Records:** Records concerning building and grounds construction and maintenance.
- **Legal Records:** Contracts and litigation records
- **Marketing and Publicity Records:** Includes photographs, publications, and consent forms.