



WPI

WPI Records Retention and Destruction Policy

1.0 Purpose

The purpose of this Policy is to ensure that necessary records and documents of Worcester Polytechnic Institute (“WPI”) are adequately protected and maintained and to ensure that records that are no longer needed by WPI, or are of no value, are discarded at the proper time. This Policy is also for the purpose of aiding employees of WPI in understanding their obligations in retaining and destroying both paper and electronic documents - including e-mail, Web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files or paper documents.

2.0 Policy

This Policy represents WPI’s procedures regarding the retention and disposal of paper or electronic records.

3.0 Administration

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical and electronic records of WPI. The Chief Information Officer and Chief Information Security Officer (the “Policy Administrators”) are the individuals in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed.

4.0 Document Destruction

In accordance with Massachusetts law and WPI’s Data Classification Policy, any documents containing personal or sensitive information should be destroyed so that the information cannot be practically read or reconstructed. For paper documents, this means that personal or sensitive data should be destroyed with a cross-cut shredder or shredding service; for electronic documents, personal or sensitive data should be destroyed or erased with scrubbing technology, degaussing technology or through other means of physical destruction where the information cannot be practically read or reconstructed. For complete details of what is considered personal or sensitive data, please refer to WPI’s Data Classification Policy.

5.0 Suspension of Record Disposal in Event of Litigation of Claims

From time to time, WPI’s Office of General Counsel may issue a notice to particular WPI employees, faculty, and/or staff in the form of a Document Preservation Memo, suspending the destruction of certain records due to pending, threatened or otherwise reasonably foreseeable litigation, audits, government investigations or similar proceedings. The Document Preservation Memo will detail the recipients’ obligations to preserve – and not destroy – applicable records. The receipt of the Document Preservation Memo will also place the recipient on “Legal Hold,” and will trigger the Policy Administrators to do the following:

- Put the recipients’ e-mail account(s) on a Legal Hold;



- Turn off automatic e-mail archiving for the recipients' mailboxes; and
- Remove all backup tapes pertaining to e-mail from the general rotation cycle and store them in a designated location.

The Office of General Counsel will notify the Policy Administrators when the litigation is resolved, to turn off the above document preservation mechanisms.

WPI takes very seriously its obligations to preserve information relating to litigation, audits, and investigations. The consequences of failing to retain items subject to a Legal Hold can be serious, including possible criminal and civil sanctions against WPI and its employees, and possible disciplinary action against responsible individuals. Each WPI employee, faculty and/or staff member has an obligation to *immediately* contact the Office of General Counsel with knowledge of any potential or actual litigation, external audit, investigation, or similar proceeding involving WPI.

To be clear, preservation requests resulting from a Document Preservation Memo and resultant Legal Hold are an exception to this Policy. As such, when WPI faculty, employee or staff receive a Document Preservation Memo, the retention periods noted in **Appendix A** will be suspended for the relevant documents until such time as the Office of General Counsel and Policy Administrators lift the Legal Hold.

Questions about Legal Holds or any other issue regarding the records shown in **Appendix A** should be addressed to the Policy Administrators and the Office of the General Counsel.

6.0 Applicability

This Policy applies to all physical and electronic records generated in the course of WPI's operation, including both original documents and reproductions.

7.0 Enforcement

Any person that violates this policy will be subject to the disciplinary action.

8.0 Approval and Revisions

Policy Category: Institutional Risk & Compliance

Policy Approved By: Approved by WPI's Information Security, Risk and Compliance Committee on 09/26/2018.

Policy Reviewed Annually By: Sean O'Connor

Related University Policies: None

Last Modified: 9/26/2018



Appendix A: Schedule of Records and Retention

Functional Area	Record Class	Record Types	Paper Retention	Electronic Retention	Data Steward
Institutional Records	Organization	Articles of Incorporation, By-laws,	Permanent	Permanent	Executive Director, Kyle Siegel
	Trustee	Meeting Minutes & Other	Permanent	Permanent	Executive Director, Kyle Siegel
	Publications	Catalogs, Commencement Program	Permanent	Permanent	CMO, Maureen Dianna
	Reports	Degree, Enrollment, Grade, *Electronic only	Permanent	Permanent	Director, IR Alison Donta-Venman
Legal	Legal/IP	Legal Files	10 years	10 years	General Counsel, David Bunis
		Intellectual Property & Trade Secrets	Life of trade Secret	Life of trade Secret	General Counsel, David Bunis
	Contracts	Contracts, Leases, license & Other legal documents	3 years after life of agreement	3 years after life of agreement	General Counsel, David Bunis
Insurance	Insurance	Property, liability, travel, etc.	10 years	10 years	EVP, Jeffrey Solomon



University of Advancement	Donor Files	Constituent Records, Life Income Agreements, Endowment Information, Planned Giving Information	Permanent	Permanent	AVP, Advancement Cheryl Cerny
	Gift Receipts	Gift Receipts	N/A	7 Years	AVP, Advancement Cheryl Cerny
Finance	Accounts Payable	A/P Ledgers, Invoices, Check Requests, Wire Transfers, Journal Entries	7 Years	7 Years	Controller, Patrick Hancock
	General Accounting	Bank Statements, Reconciliations, Cancelled Checks (maintained by bank)	3 Years	6 Years	Controller, Patrick Hancock
	Student Accounts/Cashier's Office	Deposit Slips, Supporting Documentation and Reconciliations, Loan Disbursement, Rosters	3 Years	6 Years	Bursar, Lynn Beauregard
	Grant Accounting	Grant Contracts, Budgets, Reports, Time and Effort	3 Years after close of grant or until audit findings, claims, or litigation have been resolved.	6 Years	Controller, Patrick Hitchcock
	Permanent Records	External Auditor Records, Annual Financial Statements, Fixed Asset Recording Records (Deeds), A-133, NCAA Audit, MOSFA Audit	Permanent	Permanent	Controller, Patrick Hitchcock



Payroll	Payroll	Indirect Cost Rate Calculation	6 Years	6 Years	Payroll Manager, Lori Costello
		Annual Payroll Records (W2), 1099, 1042, Deduction Authorization (W4), Collective Bargaining Agreements, Income Records (Auto, Moving expenses), Payroll Registers	6 Years	6 Years	Payroll Manager, Lori Costello
Employee Records	Existing Employee Records	Employee Personnel File (Application, Performance Appraisals, Merit, Salary, etc. for staff and Academic Administrators; Contractors for Adjunct, and Full-Time Faculty)	6 Years after Separation	6 Years after Separation	Executive Director, Alana Dros
		Faculty Personnel File (Biographical, Application, Transcripts, etc.)	6 Years after Separation	6 Years after Separation	Executive Director, Alana Dros
		Faculty Resumes and Transcripts	6 years after Separation	6 Years after Separation	Executive Director, Alana Dros
		Faculty Appointment Negotiation Records (Promotion & Tenure)	7 Years	7 Years	Executive Director, Alana Dros
		Visiting Scholars and Post- Doc Records (Vitae, emails, etc.)	6 Years after Separation	6 Years after Separation	Executive Director, Alana Dros
		Immigration	6 Years after Separation	6 Years after Separation	Executive Director, Alana Dros
		I-9	3 Years after Termination	3 Years after Termination	Executive Director, Alana Dros



	Benefits (Certificates of Insurance, Policies, Contracts for Benefits, etc.)	6 Years	6 Years	Executive Director, Alana Dros	
	Special Arrangements/Severance Agreements	Permanent	Permanent	Executive Director, Alana Dros	
	OSHA/Workers Compensation Illness and Injuries	30 Years	30 Years	Executive Director, Alana Dros	
	OSHA/Workers Compensation Illness and Injuries	6 Years after Creation	6 Years after Creation	Executive Director, Alana Dros	
	Medical/Personnel File	6 Years after Termination	6 Years after Termination	Executive Director, Alana Dros	
	Position Description Documents	Permanent	Permanent	Executive Director, Alana Dros	
	FMLA	Dates of FMLA Leave, Notices, Disputes, Notes, etc.	4 Years after Termination	4 Years after Termination	Executive Director, Alana Dros
	Union	NLRB Certificates	6 Years from Last Effective Date	6 Years from Last Effective Date	Executive Director, Alana Dros
		Collective Bargaining Agreement	Permanent	Permanent	Executive Director, Alana Dros
	Other	Unemployment Insurance	7 Years	7 Years	Executive Director, Alana Dros
Retirement (ERISA)		6 Years after Filing	6 Years after Filing	Executive Director, Alana Dros	



Employment General	Search Records	Position File (Including CV's, Letters, Copies of Ads, Search Waivers, and Background Checks, etc.) for individuals not hired	13 Months from Date Position Filled	13 Months from Date Position filled	Executive Director, Alana Dros
	IPEDS	All Data Used to Complete IPEDS Survey	Permanent	Permanent	Executive Director, Alana Dros
	Vets 100	Federal Contract Veteran's Employment Report	Permanent	Permanent	Executive Director, Alana Dros
	Affirmative Action	Affirmative Action (Public or Private and Supporting Reports)	Permanent	Permanent	Executive Director, Alana Dros
Payroll	Payroll	Annual Payroll Records (W2), 1099, 1042, Deduction Authorization (W4), Collective Bargaining, Agreements, Income Records, (Auto Moving Expenses), Payroll Registers	6 Years	6 Years	Payroll Manager, Lori Costello
Recruit & Applicant Undergraduate	Recruits/Applicants that do not enter	Acceptance Letters, AP Records, Applications, Correspondence, Test Scores, Medical Records, Recommendations, Military Documents, Placement Test Information, Transcripts & International Student Documents	1 Year after Application Term	Permanent	Director, Jennifer Cluett



Recruit & Applicant Graduate	Recruits/Applicants that do not enter	Acceptance Letters, AP Records, Applications, Correspondence, Test Scores, Medical Records, Recommendations, Military Documents, Placement Test Information, Transcripts & International Student Documents	3 Years after Application Term	Permanent	Dean, Michael McGrade
	Recruits/Applicants that do not enter	Acceptance Letters, AP Records, Applications, Correspondence, Test Scores, Medical Records, Recommendations, Military Documents, Placement Test Information, Transcripts & International Student Documents	3 Years after Application Term	Permanent	Director, Suzanne Sontgerath
	Students/Applicants That Enroll	Permanent File (Acceptance Letter, Application, Transcripts, DAS, 120, Name Changes)	Permanent	Permanent	Registrar, Sarah Miles
		Temporary File (AP Records, Correspondence, Test Scores, Military Documents, Placement Test Information)	5 Years After Graduation/ Date of Last Attendance	Permanent in Banner	Registrar, Sarah Miles



Student	Students/Applicants That Enroll	International Student Documents	7 Years post separation	N/A	Director International Student Life, Colleen Callahan Pandey
		Housing Information (Housing Placement Forms, Housing Agreements, etc.)	5 Years after Graduation/ Date of Last Attendance	Permanent in Banner	Director or Residential Services, Casey Wall
		Medical Records	10 Years After Date of Last Attendance	10 Years after Graduations /Date of Last Attendance	Director/Nurse Practitioner, Regina Roberto
		Counseling Records	10 Years after Graduation/ Date of Last Attendance	10 Years after Graduation/ Date of Last Attendance	Director Counseling, Charles Morse
		Student Health Records	10 Years after Graduation/ Date of Last Attendance	10 Years after Graduation/ Date of Last Attendance	Director/Nurse Practitioner, Regina Roberto
		Requests for Formal Hearing, Requests/Disclosures for PII, Student Statements, Written Decisions, Student Requests for Nondisclosure, Students Written Consent	Permanent	Permanent	Dean of Students, Gregory Snoddy
		FERPA			Registrar, Sarah Miles
Student	Registration/Academic Records	Academic Action Authorization (Dismissal, Probation)	5 Years After Graduation/ Date of Last Attendance	Permanent in Banner	Registrar, Sarah Miles



Student	Registration/Academic Records	Academic Advising Correspondence	5 Years after Graduation/ Date of Last Attendance	Permanent Starfish & Salesforce	Paul Reilly/Melissa Terrio
		Correspondence, Credit by Exam Scores (AP, CLEP, etc.), Curriculum Change Authorizations, Degree Audits, Grade Authorizations, Transfer Credit Evaluations	5 Years after Graduation/ Date of Last Attendance	Permanent Starfish	Registrar, Sarah Miles
		Applications for Graduation, Class Schedules, Personal Data Information Forms	5 Years after Graduation/ Date of Last Attendance	5 Years after Graduation/ Date of Last Attendance	Registrar, Sarah Miles
		Audit Authorizations, Add/Drop, Grade Reports, Pass/Fail Requests, Enrollment Verifications, Social Security Certifications	5 Years after Graduation/ Date of Last Attendance	Permanent in Banner	Registrar, Sarah Miles
		Transcript Requests	1 Year after Date Submitted	Permanent in Banner	Registrar, Sarah Miles
		Academic Records, Change of Grade Forms, Graduation Lists	5 Years after Graduation/ Date of Last Attendance	5 Years after Graduation/ Date of Last Attendance	Registrar, Sarah Miles
Student	Financial Aid	SFA Program Records (Participation Agreements)	Permanent	Permanent	Director of Financial Aid
		Fiscal Operations Report (FISAP), All Other Records/Reports	Permanent	Permanent	Director of Financial Aid
		SFA Recipient Records (SAR, ISIR, DoE, Eligibility, Financial Aid History, etc.)	3 Years from the Date of Attendance	3 Years from the Date of Attendance	Director of Financial Aid



Student	Financial Aid	Requirements for Specific Aid (Campus Aid, Pell Grant)	3 Years from the Date of Attendance	3 Years from the date of Attendance	Director of Financial Aid
		Borrower's Eligibility Records	3 Years from Last Date of Attendance	3 Years from Last Date of Attendance	Director of Financial Aid
		Disbursement Files (ASA, ELM)	3 Years from Date of Attendance	3 Years from the Date of Attendance	Director of Financial Aid
		Perkins Original Promissory Note	3 Years from Last Date of Attendance	3 years from the Last Date of Attendance	Director of Financial Aid
		Records related to school eligibility (e.g. ECAR, FISAP, PPA, federal audit and program review)	Permanent	Permanent	Director of Financial Aid
		Records relating to student eligibility (e.g. COA, SAP, student's program of study, PJ, data to establish student's admission, enrollment status)	7 years after the academic year in which the document was created.	7 years after the academic year in which the document was created.	Director of Financial Aid
		Fiscal Records (e.g. all FSA & state program transactions, bank statements containing all FSA funds, records of student accounts, charges, cash payments, general ledger, FWS/CS payroll records)	7 years after the academic year in which the document was created.	7 years after the academic year in which the document was created.	Controller, Patrick Hitchcock



Student	Financial Aid	Loan Program Records (e.g. paper or electronic loan certification or origination record, loan amount, period of enrollment, dates school disbursed the loan for student and parent borrower)	7 years after the academic year in which the document was created.	7 years after the academic year in which the document was created.	Director of Financial Aid
	HEA Requirement	Crime Statistics, Security Report, SRK	Permanent	Permanent	Director of Financial Aid
Student	HEA Requirement	Athletic Participation	5 Years from Date of Discloser of Required Disclosure	5 Years from Date of Disclosure of Required Disclosure	Director of Financial Aid
		Institutional Information (Cost of Attendance, etc.)	Permanent	Permanent	Director of Financial Aid
	International	SEVIS F-1 and M-1	3 Years After Student Leaves	N/A	Director International Student Life, Colleen Callahan Pandey

**Please note that for all categories that read 6 years after separation, records should technically not be destroyed for 6 years +1 day after separation.*