

Record Retention Policy The Cooper Union

POLICY STATEMENT

The Cooper Union requires that different types of records be retained for specific periods of time, and has designated official repositories for their maintenance. These records must be managed according to procedures that are outlined in this document.

REASON FOR POLICY

The Cooper Union is committed to effective records retention to preserve its history, meet legal standards, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed.

WHO SHOULD READ THIS POLICY

Executive Staff
Deans, Directors, and Department Heads
Administrative staff responsible for the maintenance of Cooper Union records
Anyone accessing Cooper Union records

RECORDS KEPT BY INDIVIDUALS ARE NOT OFFICIAL RECORDS OF THE COOPER UNION. ALL SUCH RECORDS SHOULD BE TRANSFERRED TO THE APPROPRIATE REPOSITORY OR DESTROYED, WHICHEVER IS APPROPRIATE.

CONTACTS

Direct any questions about this policy to your department's administrative manager. If you have questions about specific issues, contact the following:

Contact	Telephone
Vice President Finance & Administration	212.353.4150
Controller	212.353.4152

DEFINITIONS

These definitions apply to these terms as they are used in this policy.

Active Record	A record with current administrative use for the unit that generated it. Records remain active for varying numbers of years, depending on the purpose for which they were created.
Archival Record	A record that is inactive; not required to be retained in the office in which it originated or was received and is of historic value.
Official Repository	The unit designated as having responsibility for retention and timely destruction of particular types of official Cooper Union records. Such responsibility is assigned to the unit's administrative manager or designee.
Cooper Union Record	The original copy of any record, including, but not limited to, correspondence on official company letterhead and correspondence sent and received via electronic mail (e-mail). Official repositories for these records are identified in Tables 1 and 2 of this document.

OVERVIEW

The Cooper Union requires consistent treatment of records. Maintenance, retention, and disposal procedures for Cooper Union records must be followed systematically by staff in all areas.

In addition, duplicate or multiple copies of these records, retained in locations other than Official Repositories, must be disposed of when they are outdated and no longer useful.

This policy is intended to ensure that The Cooper Union:

- ✓ meets legal standards;
- ✓ optimizes the use of space;
- ✓ minimizes the cost of record retention;
- ✓ preserves the history of the institution;
- ✓ destroys certain confidential, outdated and useless records.

PROCEDURES

Responsibilities for Managing Official Cooper Union Records

Departments and units that maintain Cooper Union Records are called “Official Repositories.” These administrative units are responsible for establishing appropriate record retention management practices. Each unit’s administrative manager or a designee must:

- ✓ implement the unit’s and/or office’s record management practices;
- ✓ ensure that these management practices are consistent with this policy;
- ✓ educate staff within the administrative unit in understanding sound record management practices;
- ✓ ensure review of inactive records of historic value by the Archives Librarian and dispose of as appropriate;
- ✓ ensure that access to confidential files is restricted;
- ✓ destroy inactive records that have no archival value upon passage of the applicable retention period.

If you have any questions about your responsibilities, contact The Cooper Union Vice President of Finance & Administration, who will work closely with you to ensure understanding of this policy and implementation of these responsibilities.

Preserving or Disposing of Official Cooper Union Records

When the prescribed retention period (see Tables 1 and 2, which follow) for official Cooper Union Records has passed, a determination of whether to preserve or dispose of the documents must be made. To decide if the record is of historic value to The Cooper Union, consult the Archives Librarian, who has the authority to designate which records are archival.

- **Option A**

Archival Records

If you have determined that the records are archival, they may be transferred to The Cooper Union Archives. Call the Archives Librarian to:

1. Review records to be sent to The Cooper Union Archives.
2. Schedule a time for boxes to be picked up.
3. Identify the contents and date each box.

- **Option B**

Non-archival Records

If you have determined that it is appropriate to dispose of the records, destroy them in one of the following ways:

1. Recycle non-confidential paper records.
2. Shred or otherwise render unreadable confidential records.
3. Erase or destroy electronically stored data.

Caution: Periodically review records generated and maintained in The Cooper Union information systems or equipment (including mainframe, mini, and micro computing/storage systems) to ensure that these requirements are met.

Caution: The Cooper Union expects all employees to comply fully with any published records retention or destruction policies or schedules, provided that all employees should note the following exception to any designated destruction

schedule. If you believe, or the Vice President Finance & Administration informs you, that certain records are relevant to litigation or potential litigation (i.e., a dispute that could result in litigation), then you must preserve those records until the Vice President Finance & Administration determines the records are no longer needed. This exception supersedes any previously or subsequently established destruction schedule for those records. If you believe that exception may apply or you have any question regarding the possible applicability of that exception, please contact the Vice President Finance & Administration.

If the record must be maintained, send to the official repository as noted in Tables 1, 2.

Treatment of Electronic Records (E-mail)

As you can see in the Definitions section above, electronic records (e.g., e-mails) are indeed Cooper Union Records that need to be retained pursuant to this policy. E-mails that are sent or received by you in the course of business at The Cooper Union may qualify as records to be managed and retained as detailed in Tables 1 and 2 herein. Essentially, for purposes of complying with this policy, e-mails should be treated like any other substantive and relevant record developed in the course of business at The Cooper Union. E-mails, to the extent that they qualify as Cooper Union records, should be printed and filed with the appropriate Official Repository as detailed in Tables 1 and 2. Questions regarding the retention period for particular e-mails sent or received by you should be addressed to your Department Head or to the Vice President Finance & Administration.

Records Retention: Location and Duration

Tables 1 and 2, which follow, list the Official Repositories for Cooper Union records as well as how long these records must be retained.

Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements. Such modifications supersede the requirements listed in this policy. Suspension of record destruction required by any of these reasons will be accomplished by a notice sent out to affected units by the Vice President Finance & Administration.

Note: No document list can be exhaustive. Questions regarding the retention period for any specific document or class of documents not included in these tables should be addressed to the Vice President Finance & Administration.

Caution: Departments and units that are not Official Repositories and that retain duplicate or multiple copies of these Cooper Union Records should dispose of them when they are no longer useful.

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Table 1

Repositories and Retention Periods for Undergraduate, Graduate, Professional, Continuing Education and Summer Session, Extramural and Special Programs Student-Related Academic Records.

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic, Student		
Academic Actions (Dismissal, Etc.)	Registrar	Permanent
Academic Integrity Code Violations	Registrar	7 years
Academic Records (including narrative evaluations, competency assessments, etc.)	Registrar	Permanent
Change of Course Forms	Registrar	6 years from date of enrollment
Change of Grade forms	Registrar	Permanent
Class of Student ID number	Registrar	Permanent
Class Lists (original)	Registrar	Permanent
Consent to release Personally Identifiable Information (Requests for non-Disclosure)	Registrar	Kept until next academic year; signatures kept 5 years
Course Offerings	Registrar, Archives	Permanent
Curriculum Change Authorizations	Registrar	5 years from graduation or date of last attendance
Disciplinary Records	Student Services (Registrar if dismissal)	Kept until graduation
Enrollment Verifications	Registrar	1 year from enrollment date
Financial Aid Records (applicants who do not enroll)	Office of Financial Aid	1 year from date of application

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Financial Aid Records (applicants who enroll)	Office of Financial Aid	5 years from graduation date
Grade Sheets	Registrar	Permanent
Graduation Lists	Registrar	Permanent
Hold or Encumbrance Authorizations	Registrar	Until Released
Immunization Records	Student Services	Until graduation
Name Changes	Registrar	Permanent
Original Grade Sheets	Registrar	Permanent
Student Class Schedules	Registrar	1 year from graduation date or date of last attendance
Student Registration Forms	Registrar	1 year from registration
Student Suspension	Registrar	7 years
Transcripts	Registrar	Permanent
Transcript Requests	Registrar	1 year from submission date
Transfer Credit Evaluations	Registrar	5 years from graduation
Withdrawal Authorizations/Leaves of Absence	Registrar	2 years

Admissions for Applicants Who Do Not Enroll, Whether Accepted or Rejected		
Advanced Placement Records, Applications for Admission or Readmission, Correspondence that is Relevant, Entrance Exam Reports, Residency Classification Forms, Letters of Recommendation, Transcripts - High School and Other College	Admissions Office	2 years from date of start of application term
Admissions for Applicants Who Enroll		
Advanced Placement Records, Applications for Admission or Readmission, Correspondence that is Relevant, Entrance Exam Reports	Registrar	5 years from graduation or date of last attendance
Letters of Recommendation	Registrar	Until date of admission
Recruitment Materials	Registrar	Until date of enrollment
Residency Certificates	Registrar	Until date of enrollment
Residency Change Documents (Non-resident to Resident)	Registrar	5 years from graduation or date of last attendance
Student Waivers for Right of Access.	Registrar	Until graduation or date of last attendance
Transcripts - High School and Other College	Registrar	5 years from graduation or date of last attendance
International Student Forms (visa documentation, etc.)	Registrar	5 years from graduation or date of last attendance

Publications, Statistical Data/Documents, and Reports		
Degree, Grade, Enrollment, and Racial/Ethnic Statistics	Registrar	Permanent
Schedule of Classes	Registrar	Permanent
Catalogs	Registrar	Permanent
Commencement Programs	Archive	Permanent

Table 2
Repositories and Retention Periods for Non-Student-Related Records

TYPE OF RECORD	OFFICIAL REPOSITORY	DURATION
Academic Personnel		
Academic Search Records	See Affirmative Action/Equal Opportunity Section	
Annual Conflict of Interest Disclosure Statements	Office of the President	3 years
Grievances	Human Resources	No Cause Findings, 3 years from determination Cause Findings, Permanent
Personnel Files, Appointment Letters and Forms	See Human Resources Section	
Tenure or Promotion Dossiers	Office of the President	If action approved, 3 years; If tenure denied, 3 years from end of term appointment
Decisions Regarding Academic Personnel	Office of the President	Permanent
Accounting and Finance		
Account Reconciliations (Balance Sheet)	Business Office	7 years

Accounts Payable Vouchers and Attachments	Business Office	7 years
Accounts Receivable Statements	Business Office	7 years
Accounting Reports (monthly reports) Schedules of Department balances, Transaction Statements, Account Analysis Statements, Monthly and Year-to-Date Salary and Wage Statements	Business Office	7 years
Annual Financial Reports and Work Papers	Business Office	Permanent
Banking Records, Including Deposit and Withdrawal Records, Bank Statements and Reconciliation, Voided and Canceled Checks	Business Office	7 years
Billing Records	Bursar	7 years
Capital Equipment Records	Business Office	Life of Asset; records of equipment purchased on federal funds must be retained for three years after final disposition
Cash Receipts	Business Office	7 years
Depreciation Records	Business Office	Life of Asset
Effort Certifications	CV Starr Research Foundation	7 years

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Indirect Cost Rate Calculations	Business Office	7 years
Inventories	Business Office	Life of Asset
Journal Entries and Back-up Documentation	Business Office	7 years
New Account Records and Back-up Documentation	Business Office	7 years after account closing
Subsidiary Ledgers (Accounts Payable, Accounts Receivable, etc.)	Business Office	7 years
Summary Analysis Reports, end of year (Fund, Source, Function)	Business Office	7 years
Trial Balances	Business Office	7 years
Transaction Authority Cards	Business Office	7 years
Travel Reimbursements and Attachments	Business Office	7 years
University Audit Work Papers	Business Office	7 years
Affirmative Action/Equal Opportunity		
Academic Search Plans and Statements	Office of the President	3 years
Academic Search Waivers	Human Resources	For Permanent Waivers, 3 years from date of appointment; For Limited-Term Waivers, 3 years from satisfaction of subsequent search requirements or appointment termination
Affirmative Action Programs	Human Resources	Permanent
Conciliation Agreements/Orders on Consent	Human Resources	Permanent
Documents supporting Other	Human Resources	3 years from effective date of

Academic or Non-Academic Selection Decisions (e.g., promotion, termination, compensation)		decision
Federal and State Required Statistics and Reports	Human Resources	Permanent
Non-Academic Search and Hiring Forms	Human Resources	3 years from date of appointment
Non-Academic Search Materials and Documents Supporting Hiring Selection Decisions	Human Resources	3 years from date of appointment
Sexual Harassment, Title IX and Title VI Complaints, Investigations, and Findings	Human Resources	No Cause Findings, 3 years from determination Cause Findings, Permanent
Alumni Affairs and Development		
Alumni Records	Alumni Affairs	Permanent
Gift Records	Development	Permanent for hard copy and electronic records
Original Gift Letter Agreements, Signed by President and Donor	Development	Permanent
Original Gift Letter Agreements, All Others	Development	Permanent
Planned Gifts (trusts, life income, agreements, annuities) Real Estate Gifts	Development	Permanent
Gift-related correspondence to or from donors	Development	Permanent
Amended or redirected gift letter agreements	Development	Permanent
Bursar		
Student Loan Records	Bursar	3 years after the loan has

		been repaid in full
Tuition and Fee Charges	Bursar	7 years
Construction		
As-built Drawings	Facilities	Permanent
Contracts and Agreements	Facilities/Business Office	7 years after expiration of all obligations
Corporate Records		
Accreditation Records	Office of the President	Permanent
Board of Trustee Minutes	Office of the President	Permanent
Bylaws	Office of the President	Permanent
Charter	Office of the President	Permanent
Environmental Health and Safety		
Evacuation Drill Records	Facilities	5 years
Fire Protection Systems Records	Facilities	5 years from date of last entry in annual log book
Hazardous Waste Disposal Manifests and Reports	Facilities	Manifest: 3 years from date accepted by transporter Reports: 3 years from due date
Incident Records	Facilities	5 years following the end of the calendar year
Human Resources		
Employee Personnel Files (including application, resume, payroll, appointment/salary forms)	Human Resources	Permanent
Employee Medical Records	Human Resources	7 years after termination of employment
Individual Contracts of Employment	Human Resources	7 years after termination of employment

I-9 Forms (Faculty and Staff)	Human Resources	3 years, or 1 year after termination (whichever is greater)
I-9 Forms (Students)	Registrar	3 years, or 1 year after termination (whichever is greater)
Occupational Injury or Illness, Records Relating to	Human Resources	5 years following end of the year to which records relate
Performance Appraisals	Human Resources	Permanent
Search Committee Records, including employment applications, resumes, and all applicant search materials	Human Resources	4 years
Union Agreements	Human Resources	Permanent
Volunteer Registration Forms, Parental Consent Forms, and Agreements	Human Resources	4 years
Workers Compensation Claims and Insurance Policies	Human Resources	18 years
Insurance		
Certificates of Insurance, Indemnification Agreements, Hold Harmless Agreements, Contracts	Business Office	7 years after expiration
Insurance Policies (Liability, Property, and Other Policies)	Business Office	Permanent
Incident Reports, Accident Reports	Facilities	4 years after report date
Legal		
Consent Orders	Business Office	Permanent
Court Orders	Business Office	Permanent
Judgments	Business Office	Permanent

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Releases	Business Office	Permanent
Settlements	Business Office	Permanent
Patent and Trademarks		
Invention Assignment Forms	CV Starr Research Foundation	Permanent
Licensing Agreements	Vice President, Finance and Administration	7 years after expiration of all obligations
Original Patents, Trademarks, and Related Work Papers	Vice President, Finance and Administration	Permanent
Royalty Records	Vice President, Finance and Administration	Life of Patent or TM plus 6 years

Payroll		
Annual Payment Records (W2, employee transaction lists)	Business Office	Permanent
Imputed Income record	Business Office	7 years after expiration of all obligations
Information Returns filed with Federal and State authorities (W-2, 1042S, etc.)	Business Office	6 years
Leave Reporting Documents	Business Office	6 years
Payroll Deduction Authorization Forms	Business Office	6 years after employment ends
Payroll Vouchers	Business Office	6 years
Record of Payments and Deductions (payroll registers, deductions lists, adjustments)	Business Office	6 years
Time Cards, student	Business Office	3 years after the date that all student loans are paid
Time Cards, other	Business Office	6 years
Wage Assignment Orders	Business Office	5 years after closed
Pension and Welfare Benefits		
Employee Eligibility for Pension and Welfare Benefits	Human Resources	7 years after year of final benefit payment
Employee Personal Information (name, address, SSN, period of employment)	Human Resources	7 years after year of final benefit payment
Employee Service Records	Human Resources	7 years after year of final benefit payment

Pension and Welfare Benefits Paid to Employees or their Beneficiaries	Human Resources	7 years after year of final benefit payment
Pension Plans and Welfare Plans and All Related Plan Documentation (e.g., sample enrollment materials, investment materials, SPDs, SMMs, sample loan documents and election forms)	Human Resources	Permanent
Pensions or Pension Plans Filed with the Department of Labor and Internal Revenue Service	Human Resources	Permanent
Planning and Budget		
Plans and Projections	Business Office	7 years
Public Safety		
Accident Reports	Facilities	4 years after report date
Crime Reports	Facilities	4 years after report date
Property Damage Reports	Facilities	4 years after report date
Statistics on Criminal Offenses on Campus	Facilities	3 years
Purchasing		
Purchase Orders, Contracts, Agreements	Business Office	7 years after expiration of all obligations

Real Property		
Documents for leases, licenses, construction contracts and other contracts of a temporary nature valued at less than \$50,000	Business Office	7 years after expiration of all obligations
Property Deeds, Easements, Licenses, Rights of Way, Leases, Rights of First Refusal, Remainder Interests, Mortgages	Business Office	Permanent
Property Tax Returns filed with taxing jurisdiction	Business Office	Permanent
Title Insurance Policies	Business Office	10 years after disposal of property
Sponsored Projects Contracts, Grants		
Grant and Contract Applications, Proposals, and Supporting Documentation	CV Starr Research Foundation, Institutional Grants	6 years after close of grant (for New York State) 3 years after close of grant (for Federal Grants and Contracts)
Human Subject Records	Institutional Review Board	3 years or Contract Period
Tax		
Assets; Acquisition/Disposition	Business Office	7 years from disposition of asset
Depreciation Schedules	Business Office	Permanent
Excise Tax Returns	Business Office	Permanent
Fringe Benefit Returns	Human Resources	Permanent
Income tax Returns	Business Office	Permanent
Information Returns (990,	Business Office	Permanent

1099)		
Payroll Tax Returns (W-2, Social Security, Unemployment Tax)	Business Office	Permanent
Pension Tax Returns	Business Office	Permanent
Property Tax Returns	Business Office	Permanent
Sales Tax Returns	Business Office	Permanent