



Policy Title: Record Retention Policy

Policy Number: 900

Responsible Executive(s): President

Responsible Office(s): Office of Legal Counsel

Date Adopted: 4.23.2003

Date Revised: 07.02.25

A. Purpose

Regis University is committed to effective records management, including meeting legal standards for record retention and protection of privacy, optimizing the use of space, minimizing the cost of record retention, and destroying outdated records in an appropriate manner. The purpose of this policy is to establish guidelines and procedures for the retention of records to ensure that necessary records and documents are adequately protected, maintained, and discarded appropriately. This policy applies to all records, including hard (paper) copy, electronic copy, or any other media without regard to where the same may be stored.

Consistent with these objectives, it is the University's policy that records be retained for so long as (but only so long as) necessary to satisfy legal requirements, financial and audit requirements, and legitimate business purposes.

All employees of the University are charged with the personal responsibility of complying with this Policy.

In no event should records be altered, destroyed, or concealed with the intent to impede, obstruct, or influence any litigation or governmental proceeding. Unauthorized destruction or disposal of University records may subject an employee to disciplinary action, including termination.

This policy and the Records Retention Schedule will be reviewed periodically and amended as necessary to reflect any changes in laws, regulations, or business requirements.

B. Scope

All Regis employees, volunteers, and Board of Trustees are required to uphold this policy as it relates to all financial, educational, and administrative policies and records.

C. Policy

1. Administration

- a. The records committee governs the retention and disposal of the University's records.
- b. The records committee consists of the Provost, a Dean of Admissions, the Associate VP of Human Resources, the University Controller, the Chief Information Officer, the Director of the Center for Scholarship and Research Engagement, the Dean of Libraries, and the Associate VP of Physical Plant. The University's Chief Legal Officer or other designated officer shall serve as the committee chair.
- c. The records committee is authorized to perform the following functions:
 - i. identify and evaluate which records should be retained;
 - ii. publish a retention and disposal schedule that is in compliance with local, state, and federal laws;
 - iii. monitor local, state, and federal laws affecting record retention;
 - iv. annually review the record retention and disposal program;
 - v. develop a training program for personnel responsible for record storage and maintenance; and
 - vi. monitor all departments for compliance with the record management program.
- d. Each department head will prepare a listing of major documentation used and maintained by the department and will compare it to the documents listed in the Record Management Policy. In addition, each department head periodically will review currently used records to determine whether these records are adequate and appropriate for each department's requirements.
- e. Each department head periodically will review the policy to determine any special circumstances that necessitate changes in the retention periods. Requests for changes in retention periods or deviations for specified retention periods should be made to the Committee and may be implemented only after approval by the Committee.
- f. The appropriate time periods for record retention are subject to ongoing statutory and regulatory changes. If any litigation, claim, investigation or audit is started prior to the expiration of the required retention period, record disposal shall be suspended. Any record that is relevant to pending or anticipated litigation, or that pertains to a claim, audit, agency charge, investigation or enforcement action, shall be retained at least one year past the final resolution of the action.
- g. It is the responsibility of the senior administrator in each University department to establish appropriate records management procedures and practices and must:
 - i. Be familiar with this Records Management Policy;

- ii. Develop the department's record management procedures and practices, consistent with this policy;
- iii. Educate staff within the department in understanding sound record management practices;
- iv. Restrict access to confidential records and information; and
- v. Coordinate the destruction of records as provided in the applicable procedures.
- vi. Coordinate the regular disposition and destruction of obsolete records. Destruction should be carried out periodically—at least once a year. To streamline disposition, the administrator should review the department's filing arrangements, establish cut off dates periodically, and develop procedures to segregate active, inactive and obsolete files
- vii. Maintain a log of all destroyed records (generically described by file/folder) indicating the records destroyed and the date of destruction

2. Disposal and Destruction of Records at End of Retention Period

- a. When it is determined that it is appropriate to dispose of any records consistent with this policy, they can be destroyed in one of the following ways:
 - i. Recycle non-confidential paper records;
 - ii. Shred all confidential paper records; or
 - iii. Delete electronically stored data.
- b. Questions related to this policy shall be directed to the University's Chief Legal Officer.

3. Retention Periods: Retention periods shall be directed by the schedule dictated in Appendix A.

D. Definitions

- a. **Active Records** – Records needed to support current business activity of a department, division, or other organizational group supporting an institutional purpose.
- b. **Institutional Records** – Institutional records include, but are not limited to: official financial records, employment and payroll records, academic records, medical records, and any other records related to University operations.
- c. **Non-Record** - an item that is of immediate value only. Non-records may share some characteristics with university records; however, they are distinguished from university records by their transitory usefulness. Non-records may include envelopes, routing slips, data entry- and work-sheets, rough drafts, multiple copies of publications, blank forms, unofficial ("informational," "courtesy" or "convenience") copies of records, and notes and audio recordings that have been transcribed. Non-records may also include duplicates that are maintained for convenience by a person or office who is not the originator or recipient (including copied recipient) of the record and electronic mail of temporary value.
- d. **Record** - includes without limitation, documents and electronically stored information (including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium) created for one or more purposes related to the University's business. For example, and without limitation, "records" may include books, ledgers, files, memoranda, letters, reports, worksheets, slides, other presentation materials, calendars, appointment books, telephone logs, and time and expense reports, whether in hard copy or electronic format, and computerized data and programs, computer hardcopy printouts, computer-related magnetic materials (e.g. word processing and personal computer diskettes, and magnetic tapes and cassettes), microfilm and

microfiche, telecommunicated material such as facsimiles and other electronically stored information such as e-mail. A university record does not include: Materials preserved or appropriate for preservation because of historical value of the materials; library books, pamphlets, newspapers, or museum material made, acquired, or preserved for reference, historical, or exhibition purposes; private papers, manuscripts, letters, diaries, pictures, biographies, books, and maps, including materials and collections previously owned by persons other than the University; and non-records.

e. **Record Retention Period** the length of time for which a record must be retained in accordance with the Records Retention Schedule.

f. **Records Retention Schedule** is the schedule that sets forth the length of time that categories of records must be maintained.

g. **Record Hold** a period of time during which pertinent records may not be disposed of even if they are no longer needed for legitimate business purposes or if the applicable Records Retention Period has expired.

h. **Retention Period** The minimum required length of time that a record is retained by the University in an accessible format.

E. Related Policies, Procedures, Forms and Other Resources

a. [Federal Student Aid Handbook](#)

b. [Instructions for Form 990 Return of Organization Exempt from Income Tax](#)

c. [County Record Management Manual County Treasure](#)

APPENDIX A: Regis University Records Retention Schedule

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<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
<u>Administrative Records</u>			
Accreditation Records <ul style="list-style-type: none"> • Evaluation Reports from Accreditation Organizations • Final Reports sent to Accreditation Organizations • Self-evaluation Reports • Statistical Data • Working Papers 	Office of the Registrar	Permanent	Voluntary compliance with State Archives Schedule 8
Audit Reports	Financial Affairs	10 years or until no longer needed for reference, whichever is longer	Voluntary compliance with State Archives Schedule 8
Committee Records <ul style="list-style-type: none"> • Agendas • Meeting Minutes • Reports • Working Papers • Related documentation and correspondence 	Originating Department	5 years	Voluntary compliance with State Archives Schedule 8
Correspondence, Administrative <ul style="list-style-type: none"> • Communications received or sent which contains significant information about the programs of a unit 	Originating Department	2 years	Voluntary compliance with State Archives Schedule 8
Correspondence, Ephemeral <ul style="list-style-type: none"> • Communications received or sent which do not contain significant information about programs of a unit, fiscal 	Originating Department	Until no longer needed	

status, or routine agency operations.			
Correspondence, General <ul style="list-style-type: none"> Correspondence received or sent which contains information about routine matters. 	Originating Department	2 years	State Archives Schedule 8

<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
Gifts Records <ul style="list-style-type: none"> • Endowment Agreements • Copies of Bequest Instruments • Donation Records • Gift Intention/Pledge Forms • 	Advancement	Permanent	Voluntary compliance with State Archives Schedule 8
Gift Records <ul style="list-style-type: none"> • Gift instrument back up • Donor profiles 	Advancement	7 years after gift period ends	Voluntary compliance with State Archives Schedule 8
Identification Card Records	Auxiliary Services	6 years after employee or student separation	Voluntary compliance with State Archives Schedule 8
Institutional Planning Records <ul style="list-style-type: none"> • Activity Reports • Information Materials • Planning Committee Records • Planning Reports/Surveys • Statements of Goals and Objectives • Related Documentation 	Office of the President	Permanent	Voluntary Compliance with State Archives Schedule 8
Insurance Records <ul style="list-style-type: none"> • Auto/Liability/Property Claim Records • Policies/Riders/Endorsements • Records of Payment 	Auxiliary Services	10 years	
Key Issuance Records <ul style="list-style-type: none"> • Requests • Agreements 	Facilities Management	2 years after and until the key is returned to Issuing Dept.	

Lecture and Lecture Series Records <ul style="list-style-type: none"> • Committee Minutes/Notes • Financial Support Records • Lecture Recordings and Transcripts • Program Records and Announcements 	Unit/Program Sponsor	Until no longer needed for reference	Voluntary Compliance with State Archives Schedule 8
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<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
Legal Case Records <ul style="list-style-type: none"> Case files pertaining to legal actions brought against or on behalf of the University 	Legal Affairs	6 years after case is closed	Voluntary Compliance with State Archives Schedule 8
Legislative Relations Records <ul style="list-style-type: none"> Bill Review and Tracking Forms Copies of Pending or Approved Legislation Working Papers Related Documentation 	Legal Affairs	Until No Longer Needed	
Parking Records <ul style="list-style-type: none"> Appeal/Citation Records Permit Records 	Auxiliary Services	Current year plus 3 years	State Collections
Policies and Procedures Records <ul style="list-style-type: none"> Handbooks Mission and Policy Statements Official Procedure Guidelines Organizational Charts Strategic Planning Documents 	Originating Department	Permanent. Previous policies should be retained for 5 years post-revision unless a separate document memorializes the changes.	
Real Property Records <ul style="list-style-type: none"> Deeds Easement Agreements Leases Property Descriptions Purchase Agreements Sale Agreements Title Abstracts Related Documentation 	Financial Affairs	Permanent	Voluntary Compliance with State Archives Schedule 8
Faculty Senate Records			
Agendas Meeting Minutes	Faculty Senates	Permanent	
Award records <ul style="list-style-type: none"> Winners' names 	Faculty Senates	5 years	

Election/ Ballot Records <ul style="list-style-type: none"> • Ballots • Results 	Faculty Senates	5 years Permanent	
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<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
Faculty Handbooks	Office of the Provost	Permanent	
Governing documents: Faculty Senate Constitution and Bylaws, Rules of the Faculty Senate	Faculty Senates	Permanent	
Membership lists	Faculty Senates	Permanent	
Policies and Procedures	Faculty Senates	Permanent	
Privilege and Tenure Committee Records <ul style="list-style-type: none"> Grievance case files Other confidential files 	Academic Dean Office or Grievance Committee, if relevant	10 years from the date the case is closed.	
Reports	Faculty Senates	Permanent	
Resolutions, Motions and Enactments	Faculty Senates	Permanent	
Studies	Faculty Senates	Permanent	
Surveys	Faculty Senates	Permanent	
<u>Student Records</u>			
Admission Records	Admissions	Accepted students - 5 years after graduation or last date of attendance Rejected students - 1 year	Voluntary Compliance with State Archives Schedule 8
Class Rosters	Office of the Provost	Permanent	
Commencement Records	Registrar's Office	Permanent	Voluntary compliance with State Archives Schedule 8 designates years, but

			AACRO guidelines recommend permanent retention
Admissions Reports	Admissions	Permanent	
Examinations, Tests, Term Papers, and Homework Records Grade Books	Various academic depts. and faculty offices	1year 5 years	College Grade Appeal and Incomplete Policies; FERPA AACROA

<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
Family and Educational Rights and Privacy Act (FERPA) Disclosure Requests and Consents	Registrar	Permanent, with the exception of student's written consent for disclosure or for privacy requests, then until terminated by the student or permanent.	FERPA, Department practice
Grade Sheets	Registrar	Permanent	
Grievance Records – Academic	Unit responsible for investigating grievance	4 years after closure of grievance	
Housing Records <ul style="list-style-type: none"> Housing Contracts and Leases Related Billing Records Students/Critical Incident Files 	Housing Dean of Students	1 or 2 years after expiration of contract/lease No set standard	Department Practice
International Student Records	Designated SEVIS Officer	3 years from the time the student leaves the University	8 CFR § 214.3(g); 22 CFR § 62.10(g)
Visa and Immigration Documents	Designated SEVIS Officer Human Resources	<ul style="list-style-type: none"> <u>J1 visa documents</u>: 3 years from the time the J1 exchange visitor completes the J1 program <u>H1b Public Access Files</u>: 1 year from the date the LCA expired or was withdrawn <u>PERM files</u>: 6 years from the time the FN obtains permanent residency or leaves the University <u>Employment based nonimmigrant visa petitions</u>: 3 years from the time the FN leaves the University or obtains permanent residency. <u>Immigrant Petitions</u> 3 years from the time the FN obtains permanent residency or leaves the University. 	<u>22 CFR 62.10(g)</u> <u>20 CFR 655.760(c)</u> <u>20 CFR 656.10(f) and Department Practice</u> <u>Department Practice</u> <u>Department Practice</u>
Internship Program Records	Academic Internships and Center for Experiential Learning	7 years after students no longer utilizing service	Department practice
Counseling Records	Counseling Services		

		<p>The unlicensed psychotherapist shall retain a record on each psychotherapy client for a period of seven years commencing on the date of termination of psychotherapy services or the date of last treatment with the client, whichever is later. <u>Exception.</u> When the client is a child, the record shall be retained for a period of seven years commencing either upon the last date of treatment or when the child reaches eighteen years of age, whichever comes later.</p>	<p>For Unlicensed 4 CO Code Regs 734-1 § 12</p> <p>For MFT licensed 4 CCR 736-1.16</p> <p>For LPC Licensed 4 CCR 737-1.16</p>
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<i>Document Type</i>	<i>Repository</i>	<i>Retention Period</i>	<i>Related Authority</i>
Services to Students with Disabilities Records	Student Disability Services	5 years after student's last contact with office	
Student Academic Records <ul style="list-style-type: none"> • Academic Progress Reports • Applications • Course Withdrawal Forms • Examination Reports • Grade Changes • Letters of Recommendation • Notices of Admission/Denial/Acceptance • Notices of Readmission 	Registrar, Admissions	5 years after date of last attendance Only until student is admitted Denials retained in Admissions for one year	American Association of College Registrars and Admissions
Student Account Records	Student Accounts	Permanent for all accounts with outstanding balances. All other accounts 3 years after student separation from University.	
Students of Concern Records	Dean of Students	6 years following submission of student of concern	
Student Conduct Records	Dean of Students (DOS), Academic Integrity Board	No specific requirement for retention; DOS keeps all records for 7 years pursuant to Clery Act reporting requirements, keeps records for expelled students permanently	Department Practice
Student Employment Records	Relevant academic or administrative department	7 years after separation from employment (except for Work-Study, which is 3 years after the relevant annual Fiscal Operations Report is filed)	34 CFR 675.19(b)(2)(i)-(iii)
Thesis and Dissertation Records	Originating Department or DML if supplied with the documents	Permanent	Voluntary Compliance with State Archives Schedule 8
Transcripts	Registrar's Office	Permanent	AACRO

Curriculum and Instruction Records			
Academic Program Administrative Records <ul style="list-style-type: none"> Add/Drop Reports Course Enrollment Summaries Graduation Summaries Registration Reports Summer Term Reports 	Registrar's Office	<ul style="list-style-type: none"> 1 year after semester ends Permanent Permanent Permanent Permanent 	
Course Catalog and Schedule of Courses	Registrar's Office	3 years	
Course Records <ul style="list-style-type: none"> Course Proposals Degree Requirements Syllabi 	Registrar's Office Academic or School Dean's Office	Until no longer needed for reference Indefinitely Until no longer needed for reference	Voluntary Compliance with State Archives Schedule 8
New Degree Records	Office of the Provost	As long as program is in operation	
Program Development and Review Records	Office of the Provost	Indefinitely	
Student Faculty and Course Evaluation Summaries (FCQ)	Academic or School Dean Personnel File	3 years from end of employment	
Personnel Records			
Records to complete EEO-6 or IPEDS Staff Survey	Human Resources	3 years	29 CFR § 1602.48
Employment Tests and Selection Criteria – Impact or Adverse Impact Records <ul style="list-style-type: none"> Comparative Analysis Exam 	Human Resources	1 year	29 CFR 1607.15 (A)(2)(a)
Conflict of Interest Disclosures			
<ul style="list-style-type: none"> Nepotism 	Human Resources – Personnel File	7 years after employee's separation from the University	<u>APS</u>
<ul style="list-style-type: none"> Dual Employment 	Human Resources – Personnel File	7 years after employee's separation from the University	

Employee Medical Records			
These records are not personnel records and must be kept separate from personnel records.			

<ul style="list-style-type: none"> Family and Medical Leave Act documentation <ul style="list-style-type: none"> Request for FML Medical Certification Designation Fit to Return Permanent Medical Restriction 	Human Resources	3 years after the end of documented incident	
<ul style="list-style-type: none"> Short and Long-Term Disability Documentation 	Human Resources	3 years after the end of the documented incident.	
<ul style="list-style-type: none"> Work related injury or illness <ul style="list-style-type: none"> Injury report Disposition report Permanent Medical Restriction 	Human Resources	6 years after the date of injury or 2 years after the last medical or indemnity payment	8-43-303
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Employment Eligibility Verification Records <ul style="list-style-type: none"> I-9 Forms 	Human Resources	3 years after date of hire, or one year after termination, whichever is later	8 CFR § 274a.2
Visa and Immigration Documents			
<ul style="list-style-type: none"> J1 visa documents 	Designated SEVIS Officer (DSO)	3 years from the time the J1 exchange visitor completes the J1 program	22 CFR 62.10(g)
<ul style="list-style-type: none"> H1b Public Access Files 	Human Resources	1 year from the date the LCA expired or was withdrawn	20 CFR 655.760(c)
<ul style="list-style-type: none"> PERM files 	Human Resources	5 years from the date of the PERM application filing	20 CFR 656.10(f)
<ul style="list-style-type: none"> Employment based nonimmigrant visa petitions 	Human Resources	1 year from the time the FN obtains permanent residency or leaves the university	Department Practice
<ul style="list-style-type: none"> Immigrant Petitions 	Human Resources	1 year from the time the FN obtains permanent residency or leaves the university	

Employee Personnel Records (including faculty)	Human Resources	7 years after employee's separation from the University	<u>All</u> : Title VII ADA 29 CFR 1602.49 State Archives Schedule 8
Employee Personnel Records – Faculty Anderson and RHCHP <ul style="list-style-type: none"> • Salary information • Letters of Recommendation • Information not of a confidential nature transferred from WorkDay during the faculty job application and onboarding process • Documents showing the history of the faculty member's work assignments and compensation and copies of the faculty member's letters of appointment • Correspondence related to the faculty member's employment • Other documents related to the faculty member's employment status at the university • Faculty member responses to the above, if any • Copies of faculty member's curriculum vitae at the time of hire • Transcripts of all completed academic work and information relating to the faculty member's 	Anderson or RHCH Academic Dean's Office	10 years after employee's separation from the University	Anderson/RHCHP Handbook 3.5; 3.5.1, 3.5.3

<p>academic and professional accomplishments submitted by the faculty member or placed in the file at the faculty member's request</p> <ul style="list-style-type: none"> • Current copies of any necessary license, registration, or certification • Annual faculty development plans, if desired • Faculty evaluations • Promotion applications and Rank and Promotion reviews 			
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<p>Employee Personnel Records – Faculty Regis College</p> <ul style="list-style-type: none"> • Document showing the history of the faculty member’s work assignments and compensation and copies of the faculty member’s letters of appointment; • Correspondence related to the faculty member’s employment; • Current copies of the faculty member’s curriculum vitae; • Current copies of any necessary license, registration, or certification; • Other documents related to the faculty member’s employment status at the University; and • Faculty member responses to the above, if any. • Information relating to the faculty member’s academic and professional accomplishments submitted by or placed in the file at the request of the faculty member • Summaries of student evaluations, copies of ratings and evaluations of the faculty member’s professional performance made by supervisors and the Committee on Rank and Tenure, and the formal recommendations of the faculty member’s supervisor(s) and the Committee on Rank and Tenure; • Documentation of faculty workload and evaluations relating to promotion, tenure, retention, and contractual obligations; • All official documents that are part of the promotion and/or tenure file; • Documentation of commendations, awards, and/or honors; • Summaries of submitted proposals, notices of awarded grants and contracts, 	<p>Regis College Office of the Dean</p>	<p>10 years after employee’s separation from the University</p>	<p>Regis College Faculty Handbook at 3.2.3; 3.2.4</p>
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<p>and summaries of donations or gifts received;</p> <ul style="list-style-type: none"> • Approved sabbatical proposals, sabbatical-completion written reports, STEPP Component proposals, and STEPP Component reports; • Records pertaining to disciplinary action or records pertaining to corrective measures taken by a faculty member resulting from disciplinary action; • Documentation of final actions on grievances relating to the faculty member's performance or disciplinary action; • Other documents relevant to the faculty member's academic record at the University; and • Faculty member responses to the above, if any • Non-anonymous materials from others judged by these parties to be appropriate for addition to the file • Official written correspondence addressed to the Committee on Rank and Tenure 			
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Employee Personnel Records – Student Employees <ul style="list-style-type: none"> • Offer letter 	Department	7 years after separation from employment	34 CFR 675.19(b)(2)(i)-(iii)
Employee Personnel Records <ul style="list-style-type: none"> • Offer letter 	Human Resources	7 years after separation from employment	Title VII ADA 29 CFR 1602.49 Voluntary compliance with State Archives Schedule 8
Employee Personnel Records – Volunteers and Trainees <ul style="list-style-type: none"> • Volunteer application • Training application • Letter of Invitation 	Department	5 years after last date of service with the University	
Individual Employee Security Profiles <ul style="list-style-type: none"> • Initial set up and changes to the security profile of an employee 	ITS	None	
Human Resource Recruitment and Search Committee Records <ul style="list-style-type: none"> • Application Materials • Applicant Pool • Appointment Records • Postings • Search Committee Members • Search Summary • Search Waivers • Test forms and scores 	Human Resources	1 year Note: Application of the successful candidate become part of the employee’s personnel file.	
Time and Attendance Records	Payroll	5 years from creation of the record	

Leave Records			
• Request and approval of leave	Human Resources	3 years after employee's separation or transfer from the department	
• Final leave balance	Human Resources – personnel file	10 years after separation from employment	
<u>Information Technology Services (ITS)</u>			
Service Catalog	ITS	For ITS provided services, the life of the service.	
Service Continuity Plans	ITS	For the life of the IT service	
Change Management Records	IT Service Provider	For highly critical services, the change management records should be maintained for life of the information system component. Less critical services should be maintained to support operational needs at the discretion of the service provider.	
Service Incident Records	IT Service Provider	Minimum of 1 year or longer at the discretion of the service provider.	
Service Fulfilment Requests	IT Service Provider	Minimum of 1 year or longer at the discretion of the service provider.	

Information Security Records	IT Service Providers	<p>The minimum retention period for records not covered by any regulations, external standards, federal or state laws as determined by the campus information security officer is 18 months for highly critical services. The minimum retention period for records that are covered by regulations, standards, federal law, or state law varies and must be retained for such duration.</p> <ul style="list-style-type: none"> • Payment Card Industry Data Security Standards (PCI-DSS) - 1 year • Gramm–Leach–Bliley Act (GLBA) - 5 years • Health Insurance Portability and Accountability Act (HIPAA) - 6 years • Sarbanes–Oxley Act (SOX) - 7 years <p>Less critical services should be maintained for to support operational needs at the discretion of the service provider. Recommended minimum is 90 days.</p> <p>Exceptions to be documented as part of risk acceptance decisions to be approved by the CIO.</p>	
Software Management Records <ul style="list-style-type: none"> • Licenses • Site Licenses • Software Inventories • Software Purchase Records • Related Documentation • VPATs 	IT Service Providers	Software management records should be kept for the life of the license use or life of the system.	

Email (mailbox) of all terminations, voluntary or involuntary	Information Security Officer	30 days from date of termination in HRMS.	
<u>Equipment and Supplies Records</u>			

Bid and Competitive Selection Records	Auxiliary Services	Until completion of project	
Equipment Maintenance Records	Originating Department	5 years from date of asset disposal	2 CFR 200.313(d)(4) and Federal Acquisition Regulation 52.245-1(f)(1)(ix)
Research and Teaching Drug Inventory Records	Originating Department	2 years	21 CFR 1304.04(a)
Vehicle Records <ul style="list-style-type: none"> Emission Records Fuel Records Insurance Records Maintenance Records Registration Records Titles Use Records 	Auxiliary Services	Until vehicle is no longer owned by the University.	
<u>Facilities and Property Records</u>			
Building Space Inventory and Valuation Records	Physical Plant	10 years	
Building/Grounds Repair, Maintenance, Remodeling, and Construction Records	Physical Plant	Permanent	
Capital Construction Project Records	Physical Plant	Permanent	Voluntary Compliance with State Archives Schedule 8
Land Inventory Records	Physical Plant	Permanent	Voluntary Compliance with State Archives Schedule 8
<u>Health Services Records</u>			
HIPAA Compliance Records and Reports	Counseling Services	Retain the documentation required by paragraph (b)(1) of this section for 6 years from the date of its creation or the date when it last was in effect, whichever is later	

Immunization Records	Originating Medical Services Department	Students – 2 years after student graduation or withdrawal Employees – Until no longer needed	
Medical Records <ul style="list-style-type: none"> • Students • Patients • Employees 	Originating Medical Services Department	10 years from the date of last contact with the individual for minors, for the period of minority plus 10 years (i.e., until the patient is age 28) or 10 years after the most recent patient usage, whichever is later.	6 C.C.R.1011-1
Patient Encounter Logs	Originating Medical Services Department	2 years	

Pharmacy Prescription Dispensation Records	Originating Medical Services Department	2 years	3 CCR 719-1-11.00.00
Health Insurance Records	Originating Medical Services Department	Until individual's separation from the University	
<u>Financial Aid Records</u>			
Borrowers Loan Records <ul style="list-style-type: none"> • Institutional Loans • Repayment Schedules • Statements of Rights and Responsibilities • Records of Actions Taken • Related Correspondence 	Financial Aid or Student Accounts	3 years after the end of the award year in which the student borrower last attended the University	34 CFR § 668.24
Federal Title IV, Program Records, Institutional Records <ul style="list-style-type: none"> • Accreditation Reviews and Reports • Any other record pertaining to factors of financial responsibility and standards of administrative capability • Audits and Program Reviews including school responses • Education Program Eligibility • Institutional Program Participation Agreement • Recertification • Documentation supporting degree completion, graduation rate and transfer out rate calculations 	Financial Aid	(a) Agreements: 6 years after expiration (b) 3 years after the end of the award year in which the report was submitted Records pertaining to audit and program reviews must be retained until resolution of the matter is reached.	34 CFR § 668.24

Direct Loan Program Records <ul style="list-style-type: none"> • Applications • Borrower Eligibility Calculation • Origination Records • Disbursement Records • Promissory Notes • Loan Confirmation Process 	Financial Aid	3 years after the end of the award year in which the student borrower last attended the University (loan confirmation process records are held indefinitely).	34 CFR § 668.24
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<ul style="list-style-type: none"> Entrance and Exit Loan Counseling 			
Fiscal Records and Reports <ul style="list-style-type: none"> Accreditation and Licensing Agency Reports Annual Federal Fiscal Operations and Application to Participate Report and related records used to prepare the report Cash Disbursements ED Payment Management System Cash Requests and Reports Federal Pell Grant Statements of Account Federal Work-Study Payroll Records General Ledgers and Bank Statements for all accounts containing Title IV funds Refunds and Repayments State Grant and Scholarship Award Rosters and Reports Title IV Program Reconciliation Reports Title VI Program Transaction Records 	Financial Aid	3 years after the end of the award year for which the report was submitted or the record was created	34 CFR § 668.24
Pell Grant Records	Financial Aid Office	3 years after the end of the award year for which the aid was awarded	34 CFR § 668.24

Perkins Loan Program Records <ul style="list-style-type: none"> • Promissory notes • Repayment schedules • Cancellation and Deferment Records • Annual Report 	Financial Aid Office or Student Accounts	3 years after loan repayment or from the date the loan was assigned to the Department, cancelled or repaid (or until the loan is satisfied or as long as needed to enforce the obligation)	34 CFR 668.24; 34 CFR § 674.19; 34 CFR § 674.8(c)
Student Financial Aid Records <ul style="list-style-type: none"> • Affidavit of Lawful Presence • Award Calculation Records • Applications 	Financial Aid Office	3 years after the end of the award year in which the student last attended the institution	34 CFR 668.24

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<ul style="list-style-type: none"> • Award Letters • Eligibility Records • Payment Records • Repayment Agreements • Withdrawal Calculations • Documentation of all Professional Judgment decisions • Enrollment Reporting Records 	Office of the Registrar		
Tuition Appeals	Registrar's Office	10 years from date of appeal	
Work Study Program Administrative Records <ul style="list-style-type: none"> • Award Letters • 	Financial Aid Office or Relevant Academic or Administrative Department	3 years after the award year for which aid was awarded	34 CFR § 668.24(e); 34 CFR § 675.19
<u>Safety and Security Records</u>			
Accident and Injury Reports	Campus Safety	7 years from date of accident or injury when the report was taken	
Asbestos Records	Physical Plant	30 years	OSHA & EPA
Carcinogenic Compounds Inventory/Use Records	Physical Plant	10 years	
Chemical and Hazardous Waste Disposal Records	Physical Plant	10 years	
Chemical Hazardous Material Survey Records	Physical Plant	30 years after student/employee separation	
Chemical Incident Reports	Physical Plant	5 years	
Emergency Response Plans and Procedures	Physical Plant	Until superseded	
Environmental Regulation Records	Physical Plant	Includes almost all EH&S files – refer to other entries above and below	
Fire Alarm and Drill Records	Physical Plant	3 years	
Human Material Authorizations Records	Physical Plant	375 days to 50 years depending upon type of document	NRC & CDPHE
Material Safety Data Sheets Records	Physical Plant	Until superseded	
Medical Surveillance Records	Physical Plant	Asbestos = 30 years	OSHA
Radiation Licensing Records	Physical Plant	NA	CDPHE

Radiation Material Handling and Disposition Records	Physical Plant	Permanent	CDPHE
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Radiation Monitoring and Exposure Records	Physical Plant	NA	CDPHE
Safety Inspection Records	Physical Plant	electronic database that shows inspection history; remain in system indefinitely.	
Safety Training Records	Physical Plant	paper records not needed - keep electronic database that shows latest (refresher training) + initial training date; remain in system for five year after employee leaves University.	
Vehicle Accident Records	Auxiliary Services	Until vehicle is no longer owned by the University	
Workers Compensation Records	Human Resources	7 years after the closure of the case.	
<u>Campus Safety</u>			
Traffic Offenses	Campus Safety	7 years	Clery Act
Sex Offenders	Campus Safety	Permanent 7 Years	Clery Act
Clery Crimes	Campus Safety	7 years + current reporting year	Clery Act
Hazing Transparency Report	Campus Safety	7 years	Clery Act
Annual Security and Fire Safety Report	Campus Safety	7 Years	Clery Act
Video files – non Clery	Campus Safety	30 days	
Video files – Clery related	Campus Safety	7 years	Clery Act

Field Contact Records			
Records or contacts with businesses, complainants, juveniles, victims, or witnesses after	Campus Safety	7 years	Clery Act

which no incident report is filed, including written statements			
Recorded interviews conducted during field contacts in which no incident report is filed	Campus Safety	7 years from date of contact	Clery Act
Logs			
Clery Crime Logs	Campus Safety	7 years + current reporting year	Clery Act
Routine Activity Logs – Records of Routine Welfare Checks, alarm checks, etc	Campus Safety	7 years + current reporting year	Clery Act
Miscellaneous Records			
Training Records	Campus Safety	5 years after the employee's separation from the University	
Summonses and Complaints	Campus Safety	1 years + current reporting year	
Unclaimed Property	Campus Safety	10 years	C.R.S. 38-13-404
Registered Sex Offender Records			
Sexually Violent Predators Notifications	Campus Safety	7 years	Clery act
Reports			
Accident Reports	Campus Safety	7 Years	Clery Act
Activity Summaries	Campus Safety	7 Years	Clery Act
Incident Reports	Campus Safety	7 years + current reporting year	Clery Act
Records Checks	Campus Safety	2 years + current reporting year	

<u>Athletics Records</u>			
Eligibility Checklists Records	Athletics	7 years	
Game Contracts	Athletics	7 years	
Game Statistics	Athletics	Permanent	
Individual Student-Athletes Records	Athletics	7 years	
Media Guides	Athletics	Permanent	
Photographs (Student-Athletes, Coaches, Staff)	Athletics	Until no longer needed	
Play Books	Athletics	Until no longer needed	
Practice Log Records (CARA)	Athletics	7 years	
Press Clippings	Athletics	Permanent	
Recruiting Records	Athletics	7 years	NCAA/Department Practice
Student Athlete Academic Advising Records	Athletics	6 years	Department Practice
Student Athlete Medical Records	Athletics	10 years from date of last contact	Voluntary Compliance with State Archives Schedule 8
Ticket Records	Athletics	3 years	Voluntary compliance with State Archives Schedule 8
Level II/Secondary Violations/Waiver Records/Investigation Notes	Athletics	Permanent	
Major Infractions Case/Investigation Notes/NCAA Report	Athletics	Permanent	
Participation Forms	Athletics	7 years	
National Letter of Intent/Financial Aid Agreement Forms	Financial Aid	7 years	
Transfer Information	Athletics	7 years	
Official Visits	Athletics	7 years	
Sport Camps Documentation–Camp Operating Plans and Camp Wraps	Athletics	7 years	
Rosters	Athletics	7 years	

Squad Lists	Athletics	7 years	
Sports Sponsorship files	Athletics	3 years	

Coaches Certification Exam Results	Athletics	7 years	
Campus Compliance Committee Minutes	Athletics	7 years	
<u>Budget and Finance Documents</u>			
Procurement Records			
Canceled Solicitation Files	Auxiliary Services	Until no longer needed	Voluntary compliance with State Archives Manual Schedule 7 CFR Sec 74.53
Contract Controversies and Appeals Files	Auxiliary Services	6 years If any litigation, record maintained until all issues resolved and final action taken	Voluntary compliance with State Archives Manual Schedule 7
Contract and Purchase Order Files	Auxiliary Services	6 years	Voluntary compliance with State Archives Manual Schedule 7
Leasing Contract Files	Auxiliary Services	6 years	Voluntary Compliance with State Archives Manual Schedule 7
Successful Bids and Proposals	Auxiliary Services	6 years	Voluntary Compliance with State Archives Manual Schedule 7
Real Property Acquisition Files	Financial Affairs	Permanent	

Purchase Requisitions	Auxiliary Services	Marketplace or Concur indefinitely until Regis is no longer a customer	Voluntary compliance with State Archives Manual Schedule 7
Unsuccessful Offers (Bids and Proposals)	Auxiliary Services	3 years	Voluntary Compliance with State Archives Manual Schedule 7
Bond Documents			
Bond Official Transcripts	Financial Affairs	Permanent (retained by State Archives permanently)	Voluntary Compliance with State Archives Manual Schedule 7
Bond Registration Files	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7

Bonds, Notes and Coupons Paid	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
State General Obligation Bonds	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
State Revenue Bonds/Notes	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Budget Records			
Annual Budget Document	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Budget Work Papers	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Annual Budget Reports	Financial Affairs	State: 7 years (permanent record with State Archives after 7 years)	Voluntary Compliance with State Archives Manual Schedule 7

Cash Management Records:			
Bank Records	Originating Department responsible for account	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Cash and Credit Card Receipts	Student Accounts	7 years	Voluntary Compliance with State Archives Manual Schedule 7
EFT Authorizations	Student Accounts	7 years	Voluntary Compliance with State Archives Manual Schedule 7

External Bank Account Authorization	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Payment Logs/EFT and Warrant	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Warrant Reconciliation	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Warrant/Cancelled	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Contracts:			
State Contracts / all related documents	Originating Department	3 years	Voluntary Compliance with State Archives Manual Schedule 7
Delegation of Signature of Authority	Secretary of the Board of Trustees	Until changed or 3 years, whichever is later	Voluntary Compliance with State Archives Manual Schedule 7

Expenditures:			
Employee Reimbursement Vouchers and Records	Originating Department or Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Expenditure Accounting General Documents / Control Files	Originating Department	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Federal 1099 1098-T or other Tax Reporting Records	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Inter-departmental Transfers	Originating Department	7 years, except when they are charged to a sponsored projects account	Voluntary Compliance with State Archives Manual Schedule 7

Petty Cash Records	Department or Procurement Service Center from date when Expense System implemented	7 years for General Funds,	Voluntary Compliance with State Archives Manual Schedule 7
Procurement Card Records	Department or Procurement Service Center from date when Expense System implemented	7 years within ChromeRiver until Regis is no longer a customer	Voluntary Compliance with State Archives Manual Schedule 7
Vouchers for the Purchase of Goods and Services	Department or Procurement Service Center from date when Expense System implemented	7 years within ChromeRiver until Regis is no longer a customer	Voluntary Compliance with State Archives Manual Schedule 7
Fixed Assets:			
Fixed Assets	Financial Affairs	7 years from date of asset disposal	Voluntary Compliance with State Archives Manual Schedule 7; Code of Federal Regulations, Title 2, Part 200.333(c)
Physical inventory records	Departments Keep Original & Campus Controller retains an electronic copy.	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Depreciation schedules	Financial Affairs	7 years	Voluntary Compliance with State Archives Manual Schedule

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Disposal of fixed assets records	Financial Affairs	7 years from date of asset disposal	Voluntary Compliance with State Archives Manual Schedule 7; Code of Federal Regulations, Title 2, Part 200.333(c)
Acquisition/disposal of property	Financial Affairs	State: 7 years	Voluntary Compliance with State Archives Manual Schedule 7
General Ledger:			

Adjusting Journal Entries	Approving Department	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Inventory Control:			
Inventory Records	Physical Plant	3 years	Voluntary Compliance with State Archives Manual Schedule 7
Revenue/Accounts Receivable:			
Accounts Receivable Invoices	Student Accounts	7 years, see Grants and Contracts for sponsored projects invoices	Voluntary Compliance with State Archives Manual Schedule 7
Loan Records	Student Accounts	7 years	Voluntary Compliance with State Archives Manual Schedule 7
Revenue Contracts	Originating Department	3 years	Voluntary Compliance with State Archives Manual Schedule 7
Institutional Tax Returns <ul style="list-style-type: none"> Returns and supporting documentation and schedules 	Payroll and Benefits Services	7 years	Internal Revenue Code
<u>Grants, Contracts, and Research Records</u>			

Clinical Research Records <ul style="list-style-type: none"> • Protocols • Patient Records • Regulatory Records • Associated Contracts • Accounting Records 	Department	2 years post marketing approval or IND withdrawal for research involving drugs, devices, or biologics being tested in humans	
Conflicts of Interest (COI)	Human Resources	7 years after employee's separation from the University	
Grant and Contract Project Research Records	Office of the Provost	3 years	2 CFR 200.334;

<p>Activity Reports Research Data Summary Reports Working Papers Related Documentation Laboratory Notebooks/Records Other Relevant Records that are not Housed by Other Responsible Parties</p>			<p>Federal Acquisition Regulation, section 4.805; State Archives Records Management Manual, Schedule 8, Section 12.4</p>
<ul style="list-style-type: none"> • Grant, Contract, and Awarded Proposal Records Contracts and contract mods • Grant authorizations • Subcontracts • Documented Approvals • Copies of reports • Closeout documents 	Office of the Provost	3 years after submission of the final financial report unless the retention period is extended	<p>2 CFR 200.333; Federal Acquisition Regulation, section 4.805; State Archives Records Management Manual, Schedule 8, Section 12.4</p>
<p>Grants and Contracts Accounting Records</p> <ul style="list-style-type: none"> • Account Request Forms • Assignment of Refunds Documents • Balance Sheets • Billing Records • Budget Summary Statements • Financial Reports • Invoices • Project Summaries • Related Documentation 	Office of the Provost	3 years after the date of submission of the final financial report unless the retention period is extended	<p>2 CFR 200.334 ; Federal Acquisition Regulation, section 4.805; State Archives Records Management Manual, Schedule 8, Section 12.4</p>

Institutional Review Board (IRB)	Office of the Provost	3 years after completion of activity unless Protected Health Information is collected in which case the records need to be retained for six years	21.CFR 56.115 [FDA] 45CFR46.115(b) [OHRP]
Receipts for Purchases	Department	7 years within ChromeRiver until Regis is no longer a customer; Department as required for Sponsored Projects records	
Employee Travel Authorization	Department	7 years	

Human Subjects Records <ul style="list-style-type: none"> • Approval Applications/Forms • Assurance/Certification/Declaration Forms • Consent Forms • Grant Proposals • Protection of Human Subjects Forms • Protocols • Related Documentation 	Office of the Provost	3 years after completion of the activity	21 CFR 56.11 5
Institutional Animal Care and Use Records <ul style="list-style-type: none"> • Approval Applications/Forms OMB Circular A-110 • Grant Proposals • Protocols 	Office of the Provost	3 years after completion of the activity	9 CFR 2.35(f)
Electronic Personnel Effort Reporting System Forms	Human Resources	Indefinitely	Code of Federal Regulations, Title 2, Part 200.430
Research Misconduct Records	Office of the Provost	7 years after final resolution of case unless custody has been transferred to Health and Human Services	42.CFR 93.317 93.318
Government Titled Property <ul style="list-style-type: none"> • Sponsor approval for purchase • Purchase requisitions • Purchase Orders • Orders for transfer of material, supplies, or other property • Records reflecting receipt and use of material in the performance of a contract • Records for equipment usage, maintenance and repair orders 	Auxiliary Services	3 years after disposition of property	Federal Acquisition Regulation 52.245-1

Invention Disclosure Forms <ul style="list-style-type: none"> • Licensing Agreements • Original Patents • Patent Applications • Technology Transfer Records • Related Documentation 	Legal Affairs	Permanent for original patents, formal invention assignment forms, license agreements, patent legal transactions, and invention disclosure forms; 6 years for all other records	
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<u>Payroll and Benefit Records</u>			
Annual Benefit Reports	Human Resources	Life of Plan plus 6 years	
Benefit Employer Contribution	Human Resources	Employee Tenure plus 6 years	
Benefit Plan Description/Master Contract	Human Resources	Life of Plan plus 6 years	
Benefit Plan Bidding/Selection Data	Human Resources	Life of Plan	
Benefit Provider Report of Events	Human Resources	Life of Plan plus 6 years	
Benefit Records	Human Resources	6 years past the duration of employment	
Employee Tax Records	Payroll	4 years from the date the tax is due or the tax is paid, whichever is later	26 CFR 31.6001-1
Wage Attachments, Child Support, and Garnishment Records	Payroll	3 years from the final withholding, release of employee's date of separation	Voluntary Compliance with State Archives Schedule 8
Federal Tax Levies	Payroll	10 years from the final withholding or date of employee separation	2005 Principles of Payroll Administration
Pay Authorization Records	Payroll	3 years	Voluntary Compliance with State Archives Schedule 8
Paycheck Delivery Records	Payroll	Until updated, superseded, or no longer needed for reference.	Voluntary Compliance with State Archives Schedule 8
Payroll Adjustments – Off-cycle pay, overpayments, retroactive pay, refunds, one-time pay, leave adjustments	Payroll	3 years after termination or employment or cancellation of authorization	Voluntary Compliance with State Archives Schedule 8

Payroll Check Register	Payroll	3 years	Voluntary Compliance with State Archives Schedule 8
Payroll Register	Payroll	Until updated, superseded, or no longer needed for reference.	Voluntary Compliance with State Archives Schedule 8
Direct Deposit Authorization	Payroll	3 years after change in authorization, cancellation, or employee separation.	Voluntary Compliance with State Archives Schedule 8
Tax Withholding Authorization Records W-4's	Payroll	Until superseded or 3 years after employee separation	IRS Publication 15 (Circular E), Employer's Tax Guide

Wage and Tax Statements	Payroll	4 years	IRS Publication 15 (Circular E), Employer's Tax Guide
Wage and Tax Statements – Returned undeliverable W-2's and 1042's	Payroll	4 years	IRS Publication 15 (Circular E), Employer's Tax Guide
<u>Publications, Promotions and Alumni Records</u>			
Alumni Records <ul style="list-style-type: none"> • Event Planning Records • Gift Records • Mailing Lists • Membership Lists • Related Correspondence 	Advancement	5 years or until superseded	
Fundraising Records <ul style="list-style-type: none"> • Donor Records • Event Planning Records • Fundraising Request Records 	Advancement	5 years	
Photograph (Archival)	Marcom	Permanent	Voluntary Compliance with State Archives Schedule 8
Publications <ul style="list-style-type: none"> • Books • Brochures • Catalogs • Directories • Magazines • Media Guides • Newsletters 	Marcom	Until no longer needed for reference	Voluntary Compliance with State Archives Schedule 8

<u>Library, Museum, and Collection Records</u>			
Collection and Artifact Records <ul style="list-style-type: none"> • Acquisition Logs/Purchasing • Appraisal and Valuation Records • Inventory Lists • Loan Records • 	Library	Minimum of 3 years	
Inter-Library Loan Records	Library	Minimum 3 years	Voluntary Compliance with State Archives Schedule 8
Record Management Records <ul style="list-style-type: none"> • Record Disposition Schedule 	Legal Affairs	Permanent	Voluntary Compliance with State Archives Schedule 8