

CAROLINAS COLLEGE OF HEALTH SCIENCES

POLICY AND PROCEDURE

ACADEMIC

SUBJECT: RECORDS: PRIVACY, RETENTION AND STORAGE (FERPA)

REVIEWERS: Dean of Student Affairs and Enrollment Management*
Provost

POLICY

Carolinas College of Health Sciences (Carolinas College) provides assurance of privacy, protection, and accessibility of all college records. College records are retained to document the business operations of the college; to protect the legal interests of the college, students, and teammates; to comply with applicable laws and regulations; and to preserve college history. The storage and retention of student records, including those enrolled in distance education programs, comply with the Family Educational Rights and Privacy Act (FERPA) and with various regulatory and agency guidelines for the retention and protection of student records. In addition, the college will provide privacy, protection, and accessibility of financial, personnel files and college historical documents and publications. All college records, regardless of physical or digital format and characteristics, are covered by this policy.

PROCEDURE

A. Records Retention, Storage, and Disposition:

1. Generally, records include documentary materials, regardless of format, produced or received in the course of college business.
2. The record retention schedule in Appendix A provides detailed information regarding specific content of the most common types of records and the length of the time and location each is retained. Professional organization and accrediting body standards help guide the selection of retention length for college records.
3. College teammates are required to check the record retention schedule before disposing of college records.
4. If a particular document does not appear to be covered by the schedule, teammates should consult with a member of the college leadership team before disposing of a record.
5. Only one copy of a document, regardless of format, should be retained by the teammate or department responsible for that record (referred to as the custodian of records).
6. Files containing confidential or personal information are kept in locked areas with limited access. Further protective measures (e.g., fire-proof storage) are noted in the record retention schedule in Appendix A.
7. For purposes of efficiency and management of physical and digital storage resources, unnecessary college records, regardless of format, will be disposed of appropriately and in a timely manner.
8. Teammates or departments identified as the record custodian(s) are responsible for the safe and secure access, maintenance, storage, and disposition of their records.
9. Paper files that have met or exceeded retention requirements are discarded and, if they contain FERPA-protected or other confidential, private, or sensitive information, are shredded.
10. Computer data are disposed of by rewriting over the data.
11. Faculty or staff leaving the college, or changing positions within it, must leave all college records for the use of staff and successors within the relevant program or department.
12. If a lawsuit is filed or is reasonably anticipated, document disposition will be suspended immediately and all potentially relevant records and documents, whether listed on the records retention schedule or not, must be preserved and maintained. Documents that are subject to a "litigation hold" shall be preserved and retained until such time as the college general counsel specifically authorizes the documents to be disposed.

13. In compliance with Federal Rules of Civil Procedure electronic discovery provisions, if sued, the college will maintain copies of all electronic records (i.e., emails, voice-mail messages, tapes, and web-site information including log files, metadata, cookies and any other electronically recorded information found on hard drives, servers, PDAs, cell phones, digital cameras, printers and fax machines) per Atrium Health guidelines and capabilities.
14. Information security in support of the Gramm-Leach-Bliley Act is maintained through risk assessment and planning, and by ensuring confidentiality and integrity of student information. The student's financial records and academic records are maintained separately until the student leaves the college.
15. For electronic records, the college's networks are managed by Atrium Health's Information and Analytic Services department.
16. The college leadership team will review/update the record retention schedule annually.

B. Right to access records

Academic Files (including both academic and student affairs documents)

1. Members of the leadership team and faculty may access academic files without express permission. Signatures are required for all files removed from storage.
2. Academic and student affairs staff assistants assist in the retention and storage of academic files. Other staff may access academic files on a need-to-know basis. Teammates desiring access will need approval from the Director of Student Records and Information Management to access the information on a need-to-know basis. Questions regarding the appropriateness of the request will be resolved by the Dean of Student Affairs and Enrollment Management or by the President based on a determination of legitimate educational interest.
3. In compliance with the Gramm-Leach-Bliley Act, access to protected data is limited to appropriate college personnel as determined by the Director of Financial Aid and the Dean of Student Affairs and Enrollment Management.
4. Active students have the right to review information contained in their academic or financial aid files. Contents of the academic file belong to the College and originals will not be removed. To exercise the right of review, the student must provide a written request at least one full business day prior to the requested review, and a college representative must be present during the review. Documents may be photocopied only when note taking is impractical and after approval by the person who maintains those records. If parents' financial information is maintained, the parent(s) may request that the information not be available for student review. Letters of recommendation and other documents for which the student has waived the right of review are closed to student inspection.
5. Directory information including name, address, telephone number, e-mail address, date of birth, SIS ID (student information system identification number), photograph, dates of attendance, degrees, honors and awards received, and participation in college activities may be disclosed without the expressed consent of the student.
6. Students who are 18 years of age and over are generally considered independent adults, and parents and other outside parties may have access to directory information only. Identified exceptions are listed below. In all other cases, the student must provide a written request for the release of non-directory information. A new request must be submitted each time a release of information is authorized. A faxed request is acceptable. Exceptions include:
 - a. Regulatory, accreditation, and federal agency representatives will be granted access to student and college files as needed.
 - b. Disclosures to parents are permitted in three situations:
 - Disclosure of a student's personally identifiable information to parents is permitted absent a student's written consent in the event of a health or safety emergency. The College may disclose education records in an emergency if the college determines that there is an articulable and significant threat to the health or safety of the student or other individuals.
 - Disclosure of a student's personally identifiable information is permitted to parents of the

student if the student is a dependent pursuant to Section 152 of the Internal Revenue Code of 1986 and notice is given to the student that a parent has requested such information.

- Disclosure of a student's personally identifiable information to parents is permitted without the student's written consent if the student is under 18 and has violated a law or college rule or policy governing alcohol or controlled substance consumption or possession.
- c. Court or judicial bodies may subpoena student records. The college will attempt to notify the student of its compliance with the subpoena.

Student appeals files

Current and former students have the right to review information contained in student appeal files. Contents of the file belong to the college and originals will not be removed. To exercise the right of review, the student must provide a written request at least 3-5 business days prior to the requested review, and a college representative must be present during the review. Documents may be photocopied only when note taking is impractical and after approval by the person who maintains those records. Access by others is by express permission of the President for legitimate educational reasons.

Personnel files

A teammate may review his/her personnel file upon 24-hour notice. Contents of departmental files maintained by managers may be available for review at the manager's discretion.

C. Correction of Records

A student has the right to dispute the contents of a file and may do so in writing to the Dean of Student Affairs and Enrollment Management. This right does not extend to recorded grades unless a recording error is alleged. Final decisions regarding purging or correcting disputed contents will be made by the Dean of Student Affairs. Teammates also have the right to dispute the contents of a file and may do so in writing to the President.

D. Protection of Privacy

1. Students will be notified of privacy rights annually by publication in the College Catalog/Student Handbook.
2. All personnel with access to student files must verify their understanding of FERPA via a signed statement to that effect. Annual training assures timely awareness of changes in FERPA.
3. The College will not release information other than that identified as directory information without written student consent. Further, the college will not disclose directory information that is linked to non-directory information, such as information on a student's financial aid status. For instance, if the college receives a request for information about a student's financial aid status, or if the request is for directory information but only for students who have received student financial aid, the college is restricted, under FERPA, from releasing that information without first securing the student's or former student's written consent. The college is not required to actively seek such consent, and thus may deny the original request, since to comply with it (without student permission) would disclose students' financial aid status.
4. Students may request nondisclosure of directory information by completing a form available from the Director of Student Records and Information Management. Requests for nondisclosure are valid for one year.
5. Courses that integrate the use of the college's learning management system create an electronic record of student activity that is subject to FERPA privacy rights. The identity verification process for online courses protects student privacy through the use of a secure log-in and student-selected passwords to access the learning management system. Course records for online courses are protected with the same privacy as all other courses.

6. Students who believe their rights to privacy, as protected by FERPA, have been violated, should notify the Dean of Student Affairs and Enrollment Management within 30 days of the occurrence or of their awareness of the occurrence. Students may file a complaint with the U.S. Department of Education's Family Policy Compliance Office.
 7. The College has the responsibility to notify students if it becomes aware of a FERPA violation that is not readily apparent to the students.
 8. The following corrective actions shall be implemented when a potential FERPA violation has occurred:
 - a. The Dean of Student Affairs and Enrollment Management will consult with the manager of the teammate who is believed to have committed a FERPA violation to determine whether a violation occurred and what actions should occur.
 - b. Two different levels of FERPA violations may occur:
 - Level I Violation – Accidental or inadvertent. This is an unintentional violation of privacy or security that may be caused by carelessness, lack of knowledge, lack of training, or other human error. The teammate will receive verbal counseling/education by the manager and/or Dean of Student Affairs and Enrollment Management, which will be documented on a teammate action plan form.
 - Level II Violation – Deliberate or purposeful violation or a repeated level I violation. Depending upon the severity of the violation, the teammate will receive written counseling up to recommendation for employment termination.
 - c. The student will be notified of the decision that a FERPA violation occurred, and any additional corrective actions needed for the student will be identified by the manager and Dean of Student Affairs and Enrollment Management.
 - d. The manager will notify the involved teammate of the determination of the FERPA violation and any resulting corrective actions.
 - e. Documentation related to FERPA violations will be included in the personnel file of the involved teammate.
 - 9.
- E. The Records - Privacy, Retention, and Storage policy and procedure will be reviewed biennially.

REFERENCES

Related Policies to Consult Carolinas College of Health Sciences:

ADMINISTRATIVE:

Computerized Data Backup and Recovery

Atrium Health:

HR 5.06 - Personnel Records

Related Form(s)

Teammate credentials form

Teammate action plan

Request for access to student information

Family Education Rights and Privacy Act Agreement

Related 2024 SACSCOC Standard(s)

10.3 Archived information

10.6 Distance and correspondence education

12.5 Student records

Additional policy references:

Department of Education's FERPA regulations at 34 C.F.R. §99.30, §99.31 (exceptions), at <http://www.ed.gov/policy/gen/guid/fpco/index.html>.

APPENDIX A

Core institutional database records (i.e., Sonis) are retained permanent; the retention period below applies to other documentary records.

COLLEGE ADMINISTRATION

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
College Bylaws	Permanent until update	Network drive	Administrative assistant to President	Previous versions retained in archive for 5 years
Board of Director meeting proceedings	10 years	Network drive	Administrative assistant to President	
Complaints and Appeals: - documents relevant to the report of complaint or request for appeal - the President's or college leader's response to complaint or request for appeal - documents relevant to any corrective actions taken as a result of complaint - appeal committee records - transcripts and recordings of proceedings - the findings of an appeal committee.	8 years	Network drive (electronic files); Office of administrative assistant to President (paper files)	Administrative assistant to President	
Committee/teammate meeting minutes and agendas	10 years	Network drive	Administrative assistant to President	
Recordings of teammate and committee meetings	8 Years	Network Drive	Administrative Assistant to the President	
Policies and procedures	Permanent until updated	Network drive	Administrative assistant to President	Previous versions retained in archive for 5 years
Personnel files (current teammates):	During active employment	Office of administrative	Administrative assistant to President	If teammate "shared" with other Atrium Health business unit, copies of transcript are adequate

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
- official transcripts for all post-secondary education (degree-granting only) - copy of current licenses/certification (relative or required for role) - teammate credential form (updated annually) - signed copies of teaching agreement letters for faculty and program chairs.		assistant to President		if originals are available within 48 hours of request. Department managers may also maintain a file containing attendance and counseling records, annual goals, and notes or letters related to performance. Upon termination, records sent to Atrium Health Human Resources Operations office within 30 days.
Personnel files: Former teammates - official transcripts for all post-secondary education - teammate credential form - final termination documentation (as necessary-most will be electronic in Core Connect)	10 years	Office of administrative assistant to President	Administrative assistant to President	
Completed teammate evaluation forms - annual performance appraisal - formal developmental plans - performance counseling	At least five years (Retained in alignment with Atrium Health HR guidelines)	Online human resources database	Atrium Health; Leaders	
Contracts and agreements	5 years	Network drive	Administrative assistant to President	
Organizational charts	5 years	Network drive	Administrative assistant to President	Previous versions retained in archive
Job summaries	Permanent until updated	Network drive	Administrative assistant to President	Previous versions retained in archive for 5 years
SACSCOC: Commission Board action letters	Permanent	Network drive	Administrative assistant to President; SACSCOC Accreditation liaison	
SACSCOC: Substantive change proposals	Last full accreditation cycle	Network drive	SACSCOC Accreditation liaison	

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
SACSCOC: Substantive change decisions	Permanent	Network drive	Administrative assistant to President; SACSCOC Accreditation liaison	
SACSCOC Review documents: • Institutional review ("self-study") • Evaluation committee reports • Evaluation committee recommendations • Institutional responses	Last full accreditation cycle	Network drive	SACSCOC Accreditation liaison	
SACSCOC: Correspondence between Commission staff and college	Last full accreditation cycle or as otherwise determined by responsible party	Network drive	SACSCOC Accreditation liaison	
Decision and Change log	10 years	Network drive	SACSCOC Accreditation liaison	
Recommended Change forms: Approved recommendations with supporting documentation	10 years	Network drive	Committee chairs; College leaders	
Alumni directory information	Permanent	Student information system	Director, Student Records and Information Management	
College magazine	5 years	Network drive (electronic files); Office of administrative assistant to President (paper files)	Director, Development and Alumni Relations	
Grant materials	3 years after conclusion of grant period	Network drive	Director, Development and Alumni Relations	
Donor fund solicitations	5 years	Network drive	Director, Development and Alumni Relations	

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Phoneathon materials	5 years	Network drive	Director, Development and Alumni Relations	
Donor letters of intent/gift agreements	Permanent	Network drive	Director, Development and Alumni Relations	

ACADEMIC AFFAIRS

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Programmatic accreditation/approval action letters	Permanent	Network drive	Program chair	
Programmatic accreditation/approval substantive change proposals and decisions	Permanent	Network drive	Program chair	
Programmatic accreditation/approval Review documents: • Institutional review ("self-study") • Evaluation committee reports • Evaluation committee recommendations • Institutional responses	Last full accreditation cycle	Network drive	Program chair	
Programmatic accreditation/approval: Correspondence between organization staff and program	Last full accreditation cycle or as otherwise determined by responsible party	Network drive	Program chair	
Academic Program Reviews	10 years	Network drive	Provost	
Medicare report data	10 years	Network drive	Academic affairs staff assistants; Program chair	
Student HIPAA violation: Documentation of breach of patient health information	Permanent	Network drive	College HIPAA privacy officer	Final determination if a breach occurred is determined by Corporate Privacy along with Information and Analytic Services
Student HIPAA violation documentation: Documentation of other violations	6 years	Network drive	College HIPAA privacy officer	
Graded student assignments used for programmatic outcome assessment	5 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	May be retained within online course backups

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Graded student assignments not used for outcome assessment; not returned to students	3 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	May be retained within online course backups
Graded student assignments completed within an online course	5 years	Network drive	Director, Teaching, Learning, and Technology	Course backups conducted at the conclusion of each semester
Student action plans	5 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	
Clinical evaluation documentation	5 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	
Grade books	5 years	Network drive	Academic affairs staff assistants; Program chair	
Program and course syllabi/calendars	Permanent	Network drive	Academic affairs staff assistants; Program chair	
Program/Course tracking reports	5 years	Network drive	Academic affairs staff assistants; Program chair	
Program student files	Throughout enrollment; 1 year from dismissal/withdrawal	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	
Program dismissal documentation	8 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	
Program/faculty/advisory committee meeting minutes	Last full accreditation cycle	Network drive	Academic affairs staff assistants; Program chair	
Continuing education course and workshop completion documents	3 years	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants; Program chair	Nurse Aide file contents defined by NC Division of Health Service Regulation requirements (p. 7)

Consent to participate in invasive procedures forms	1 year	Network drive; Academic affairs filing cabinets	Academic affairs staff assistants;	
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Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
			Phlebotomy education coordinator	
Survey and Evaluation data: Raw data	3 years	Network drive	Institutional research coordinator	Including but not limited to: course, classroom, clinical instructor, preceptor, clinical site, end of program evaluations.
Survey and Evaluation data: Summary data and reports	10 years	Network drive	Institutional research coordinator	Including but not limited to: course, classroom, clinical instructor, preceptor, clinical site, end of program evaluations.
Integrated Postsecondary Education Data System (IPEDS) reports	3 years	Network drive	Institutional research coordinator	
Peer review forms	3 years	Network drive	Program chair	
Strategic Plan for Institutional Effectiveness	10 years	Network drive	Institutional research coordinator	
Strategic Plan for Institutional Effectiveness: Reports	10 years	Network drive; Online assessment system	Institutional research coordinator	
Annual reports	10 years	Network drive	Institutional research coordinator	
Factbooks	10 years	Network drive	Institutional research coordinator	
External data reports (e.g., IPEDS, CCSSE)	10 years	Network drive	Institutional research coordinator	
Library access data	5 years	Network drive	Chair, Teaching and Learning Committee	
Library acquisition and deletion documentation	5 years	Network drive	Chair, Teaching and Learning Committee	
Information Systems Backup Files	90 days	IAS disaster recovery room	Atrium Health IAS	Backup conducted by Information and Analytic Services
Help Desk Logs	3 years	Network drive	Director, Teaching, Learning, and Technology	

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Training and Development records	3 years	Network drive	Director, Teaching, Learning, and Technology	

STUDENT AFFAIRS AND ENROLLMENT MANAGEMENT

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Academic Records: Active and Inactive Students • Admission Application • Acceptance Letter and Confirmation Form • Transcripts from all institutions attended • Test scores received for admission • Pre-enrollment requirements (i.e., CPR, nurse aide registry) • Transfer Credit Evaluation • Exceptional Correspondence/Anecdotal Notes • Name Change Documents • FERPA forms/Nondisclosure forms • Withdrawal forms • Dismissal forms • Application for Graduation • Graduation/Degree Audit	7 years from LDA	College vault (UL rated fire door)	Director of Student Records and Information Management	Files locked every evening and accessible only through Director of Student Records and Information Management's office.
Carolinas College transcripts	Permanent	Student information system (digital); College vault (UL rated fire door) (paper)	Director of Student Records and Information Management	Files locked every evening and accessible only through director of student records and information management's office.
College Catalogs/Student Handbook	Permanent	College vault (UL rated fire door)	Director of Student Records and Information Management	Files locked every evening and accessible only through director of student records and information management's office.

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Graduation Programs	Permanent	College vault (UL rated fire door)	Director of Student Records and Information Management	Files locked every evening and accessible only through director of student records and information management's office.
Notary Public Records: Records documenting College-related notary transactions completed by a notary public employed by the College.	7 years after expiration of notary public's commission		Director of Student Records and Information Management	
Applications for Admissions for persons who do not enroll	1 year after application deadline		Admissions Office	Standard correspondence and irrelevant files may be purged
Applications for Admissions for person admitted and who enroll	Merged into permanent student record	College vault (UL rated fire door)		Documents for admission requirements, transcripts, transfer of credits, pertinent correspondence should be kept
Documents (i.e., transcripts, scores, etc.) received with no application	6 months		Admissions Office	
Program Records (school eligibility) • Program Participation Agreement • Application portion of the FISAP • Accrediting and licensing agency reviews, approvals, and reports • State agency reports • Audit and program review reports	3 years from the end of award year from which the report was submitted	Financial Aid Office	Financial Aid Office	Electronic documents are also maintained on the network drive
Loan Program Records (student eligibility) • ISIR	3 years from the end of the award year in which	College vault (UL rated fire door)	Financial Aid Office	

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
- Application data submitted to the Department, lender, or guaranty agency by the school on behalf of the student or parent - Documentation of each student's or parent borrower's eligibility for FSA program funds - Documentation of and information collected at any initial or exit counseling required by applicable program regulations - Reports and forms used by the school in its participation in an FSA program, and any records needed to verify data that appear in those reports and forms	the student last attended			
Student Employment Records (Federal Work Study)	3 years from the end of the award year in which the student last attended	Financial Aid Office until student graduates or ends FWS employment	Director of Financial Aid	At graduation or when employment ends, whichever one comes first, the records go to the vault
Scholarship Documentation (student paperwork, i.e., Application)	3 years from the end of the award year in which the student last attended	Financial Aid Office until student graduates or enrollment ends	Financial Aid Loan Officer	At graduation or when enrollment ends, whichever one comes first, the records go to the vault
Scholarship Documentation (rankings, awarding decisions, criteria spreadsheets)	Permanent	Network Drive	Financial Aid Loan Officer	
Veteran's affairs paperwork	3 years from the end of the award year in which the student last attended	Financial Aid Office until student graduates or enrollment ends	Director of Financial Aid	
Accommodation requests and approval documentation	Length of time student is enrolled	Student Success Center	Accommodation/Student Success Coordinator	

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Housing Eligibility Form	Length of time student is enrolled	Network drive	Staff Assistant – Admissions Specialist	
Disciplinary Actions (including APG decisions)	8 years	Network drive	Dean of Student Affairs and Enrollment Management	Documentation is also copied to the student file in the vault
Admissions Decision Ranking Reports and Rating Sheets (including Holistic Review)	Permanent	Network Drive	Director of Admissions and Recruitment	
Orientation Completion Documentation (paper)	Length of time student is enrolled	Admissions until files are transferred to college vault	Director of Admissions and Recruitment and Director of Student Records and Information Management	Files are transferred to Director of Student Records and Information Management within a month of orientation
Orientation Completion Documentation (electronic)	Length of time student is enrolled	Learning management system	Director of Admissions and Recruitment and Director of student records and information management	
Signed honor codes	Length of time student is enrolled	Learning Management System	Director of Admissions and Recruitment	Prior to the Honor Code being added to the New Student Onboarding Page, the signed copy was maintained in their permanent education record in the vault.

ADMINISTRATIVE AND FINANCIAL SERVICES

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
Daily deposits	3 years	Business office filing cabinet	Staff Accountant	Off-site storage for 7 years
Invoices	1 year	Business office filing cabinet	Staff Accountant	
Checks	6 months	Business office filing cabinet	Staff Accountant	
Accounts payable	3 years and until audited			
College budgets	10 years	Network drive	Dean, Administrative and Financial Services	
Financial reports	5 years	Network drive	Dean, Administrative and Financial Services	
Purchase orders	3 years	Business office filing cabinet	Staff Accountant	
Audit records	10 years			
Emergency managements plans	Permanent until updated	Network drive	Dean, Administrative and Financial Services; Safety committee chair	
Facility master plans	Permanent until updated	Network drive	Dean, Administrative and Financial Services	
Request to edit timesheet forms	3 years	Network drive	Non-exempt staff	
Capital expenditures	5 years and until audited	Network drive	Dean, Administrative and Financial Services	
Safety data sheets	5 years	Network drive; Laboratories	Safety committee chair; faculty	
Safety reports (e.g., fire drills)	5 years	Network drive	Dean, Administrative and Financial Services; Safety committee chair	
Title IX complaint documentation	7 years	President's Office	Title IX Coordinator	Length of time may be longer depending on the

Official Record	Minimum Length of Time to Retain Record(s)	Record Storage Location	Custodian of Record(s)	Notes
				severity of the case, and if law enforcement is involved.