

**AGENDA**  
**COMBINED/HYBRID MEETING OF THE**  
**BUSINESS AFFAIRS AND EXECUTIVE**  
**COMMITTEES OF THE BOARD OF TRUSTEES**  
**Community College of Philadelphia**  
**Wednesday, September 17, 2025 – 9:00 A.M.**

**TO:** Business Affairs and Executive Committees of the Board of Trustees  
**FROM:** Jacob Eapen  
**DATE:** August 15, 2025  
**SUBJECT:** **Combined/Hybrid Meeting of the Business Affairs and Executive Committees of the Board of Trustees**

A combined/hybrid Business Affairs and Executive Committees of the Board of Trustees meeting is scheduled for September 17, 2025 at 9:00 A.M. Participants and attendees may attend in person in the Isadore A. Shrager Boardroom M2-1 or *via* Zoom. The Zoom information for the Public Session is as follows:

**Topic: 09/17/2025 Combined/Hybrid Business Affairs**  
**and Executive Committees of the Board of Trustees**  
**Public Session**

<https://ccp.zoom.us/j/92984814081?pwd=dh08WW5JNDoy1HWVEu4qRRaBokXmbY.1>

**Meeting ID: 929 8481 4081**

**Passcode: CCP**

**AGENDA**  
**BUSINESS AFFAIRS COMMITTEE**  
**PUBLIC SESSION**

Please note that Attachment A contains a spreadsheet that lists the vendor/consultant, the amount, and the source of funding (i.e., Capital Budget, Operating Budget, Grants, or Bond Proceeds) which College Administration is seeking approval.

**(1) Welding Electrical Construction at CATC: Positive Wiring – Change Orders (Action Item)**

Staff seeks approval for electrical construction change orders for the renovation of CATC welding lab and WRC classroom space to support the NWI Welding Program.

The electrical service upgrade for WRC to accommodate the relocated welding program were developed/identified after initial contract. This change order includes all labor, equipment and PECO charges for the addition 800amp service addition.

This change order in the amount of \$110,900 will be added to the original contract sum of

\$281,600.

Staff request that the Business Affairs Committee recommend to the full Board the approval of the Positive Wiring for Electrical change orders at CATC for the NWI Welding Program in the amount of \$110,900. This contract will be paid from grants.

**(2) Proposed Business Affairs Committee Meetings - FY 2026-2027**  
**(Information Item)**

Attached is a list of the proposed Business Affairs Committee meeting dates for fiscal year 2025-2026 (See attachment B).

**(3) Next Meeting – Business Affairs Committee of the Board of Trustees**  
**(Information Item)**

The next meeting of the Business Affairs Committee meeting is scheduled for October 15, 2025 at 9:00 am.

**AGENDA**  
**EXECUTIVE COMMITTEE**  
**PUBLIC SESSION**

**(1) Official Public and Special Holidays Approval (Policy #304)**

General Counsel proposes revisions to the Official Public and Special Holiday (Policy #304) for the Executive Committee's review. The College seeks to revise the policy so that it applies from year to year and does not require annual updates. Clean and redlined (to indicate proposed revisions) versions of the revised Official Public and Special Holiday (Policy #304) are attached as Attachment C.

General Counsel requests that the Executive Committee approves and recommends for approval to the Board of Trustees the revised Official Public and Special Holiday (Policy #304).

**(2) Records Management and Retention Policy Approval (Policy #313)**

General Counsel proposes revisions to the Records Management and Retention Policy (Policy #313) for the Executive Committee's review. The revisions are to ensure that the policy is legally compliant, consistent with best practices, and updated in accordance with the College's current structure. Clean and redlined (to indicate the substantive proposed revisions) versions of the revised Records Management and Retention Policy (Policy #313) are attached as Attachment D.

General Counsel requests that the Executive Committee approves and recommends for approval to the Board of Trustees the revised Management and Retention Policy (Policy #313).

**(3) Policy on College Policies Approval (Policy #319)**

General Counsel proposes revisions to the Policy on College Policies (Policy #319) for the Executive Committee's review. The College seeks to revise the policy to update the timelines for policy review. Clean and redlined (to indicate the proposed revisions) versions of the revised Policy on College Policies (Policy #319) are attached as Attachment E.

General Counsel requests that the Executive Committee approves and recommends for approval to the Board of Trustees the revised Policy on College Policies (Policy #319).

**(4) Based on the recommendations of the Business Affairs Committee, the Executive Committee of the Board of Trustees will motion on the following items:**

- Approval of award to of the Positive Wiring for Electrical change orders at CATC for the NWI Welding Program in the amount of \$110,900.
- Official Public and Special Holidays Policy (Policy #304)
- Records Management and Retention Policy Approval (Policy #313)
- Policy on College Policies Approval (Policy #319)

**EXECUTIVE SESSION**

The Business Affairs and Executive Committees will go into Executive Session  
The zoom information for the Executive Session will be provided in a separate meeting  
invite for those who will be in attendance.

JE/tn

c: Ms. Mindy Posoff  
Dr. Alycia Marshall  
Mr. Gim Lim  
Mr. Derrick Sawyer  
Ms. Carolyn Flynn

<b><u>ATTACHMENT A</u></b>			
<b>FUNDING FOR ACTION ITEMS</b>			
<b>COMBINED MEETING OF THE BUSINESS AFFAIRS COMMITTEE AND THE BOARD OF TRUSTEES</b>			
<b>AGENDA: September 17, 2025</b>			
<b>Agenda No.</b>	<b>Vendor/Consultant</b>	<b>Amount</b>	<b>Source</b>
1	Positive Wiring	\$110,900	Grants

## **ATTACHMENT B**

Proposed Business Affairs Committee  
Meetings FY 2026-2027

**PROPOSED BUSINESS AFFAIRS COMMITTEE MEETINGS**  
**FY 2026-2027**

Wednesday, July 15, 2026  
Wednesday, August 19, 2026  
Wednesday, September 16, 2026  
Wednesday, October 21, 2026  
Wednesday, November 18, 2026

\*A date may be established in December 2026

Wednesday, January 20, 2027  
Wednesday, February 17, 2027  
Wednesday, March 17, 2027  
Wednesday, April 14, 2027  
Wednesday, May 19, 2027  
Wednesday, June 16, 2027

## **ATTACHMENT C**

Official Public and Special Holidays  
Approval (Policy #304)

# Memorandum #304 Official Public and Special Holidays

Revised: \_\_\_\_\_, 2025  
Original Date of Issue: February 24, 1975  
Reissued: April 22, 2002, July 1, 2016  
Approved by: Board of Trustees  
Policyholder: AVP, Human Resources

The following are the official and special Community College of Philadelphia holidays:

Independence Day Holiday	July 4 <sup>th</sup>
Labor Day	First Monday of September 5
Thanksgiving Day College Holiday	Fourth Thursday and Friday of November
Holiday Break	December 25 <sup>th</sup> - January 1 <sup>st</sup>
Martin Luther King's Birthday	Third Monday of January
School (Spring) Holidays	First or Second full week of March
Memorial Day	Last Monday of May
Juneteenth	June 19 <sup>th</sup>



# ~~OFFICIAL PUBLIC AND SPECIAL HOLIDAYS FOR THE FISCAL YEARS OF JULY 1, 2012 – JUNE 30, 2018~~

## Memorandum #304 Official Public and Special Holidays ~~for the Fiscal Years of July 1, 2012 – June 30, 2019~~

Revised: \_\_\_\_\_, 2025~~July 1, 2016~~

Original Date of Issue: February 24, 1975

Reissued: April 22, 2002, July 1, 2016

Approved by: Board of Trustees

Policyholder: AVP, Human Resources

The following are the official and special Community College of Philadelphia holidays ~~for the fiscal years 2011/2012,  
2012/2013, 2013/2015, 2014/2015, 2015/2016 and 2016/2017:~~

<del>2011-2012</del>	-
Independence Day Holiday	<del>Monday, July 4<sup>th</sup>, 2011</del>
Labor Day	<del>Monday, First Monday of September 5, 2011</del>
Thanksgiving Day College Holiday	<del>Thursday, November 24, 2011</del> <u>Fourth Thursday and Friday of November Friday, November 25, 2011</u>

Holiday Break	<del>December 25<sup>th</sup> - January 1<sup>st</sup></del> <del>Friday, December 23, 2011 (College closed half day) through Monday, January 2, 2012</del>
Martin Luther King's Birthday	<del>Monday, January 16, 2012</del> <u>Third Monday of January</u>
School (Spring) Holidays	<del>Monday, March 5, through</del> <u>First or Second full week of March</u> <del>Saturday, March 10, 2012</del>
Memorial Day	<del>Monday, Last Monday of</del> <u>May 28, 2012</u>
<u>Juneteenth</u>	<u>June 19<sup>th</sup></u>

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<b>2012-2013</b>	-
<del>Independence Day Holiday</del>	<del>Wednesday, July 4, 2012</del>
<del>Labor Day</del>	<del>Monday, September 3, 2012</del>
<del>Thanksgiving Day College Holiday</del>	<del>Thursday, November 22, 2012</del> <del>Friday, November 23, 2012</del>

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<del>Holiday Break</del>	<del>Monday, December 24, 2012 through Tuesday, January 1, 201</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>
<del>Martin Luther King's Birthday</del>	<del>Monday, January 21, 2013</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>
<del>School (Spring) Holidays</del>	<del>Monday, March 4, through Saturday, March 9, 2013</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>
<del>Memorial Day</del>	<del>Monday, May 27, 2013</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>

<del>2013-2014</del>	<del>-</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>
<del>Independence Day Holiday</del>	<del>Thursday, July 4, 2013</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>
<del>Labor Day</del>	<del>Monday, September 2, 2013</del>	<del>Formatted: Space After: 18 pt, Pattern: Clear (White)</del>

Thanksgiving Day College Holiday	Thursday, November 28, 2013 Friday, November 29, 2013	Formatted: Space After: 18 pt, Pattern: Clear (White)
Holiday Break	Tuesday, December 24, 2013 College closed at noon through Wednesday, January 1, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
Martin Luther King's Birthday	Monday, January 20, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
School (Spring) Holidays	Monday, March 3, through Saturday, March 8, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
Memorial Day	Monday, May 26, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
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2014-2015	-	Formatted: Space After: 18 pt, Pattern: Clear (White)
Independence Day Holiday	Thursday, July 3, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)

Labor Day	Monday, September 1, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
Thanksgiving Day College Holiday	Thursday, November 27, 2014 Friday, November 28, 2014	Formatted: Space After: 18 pt, Pattern: Clear (White)
Holiday Break	<del>Wednesday, December 24, 2014 College closed at noon through Thursday, January 1, 2015</del>	Formatted: Space After: 18 pt, Pattern: Clear (White)
Martin Luther King's Birthday	Monday, January 19, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
School (Spring) Holidays	Monday, March 2, through Saturday, March 6, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
Memorial Day	Monday, May 25, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
2015-2016	-	Formatted: Space After: 18 pt, Pattern: Clear (White)

Independence Day Holiday	Monday, July 6, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
Labor Day	Monday, September 7, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
Thanksgiving Day College Holiday	Thursday, November 26, 2015 Friday, November 27, 2015	Formatted: Space After: 18 pt, Pattern: Clear (White)
Holiday Break	Thursday, December 24, 2015 College closed at noon through Friday, January 1, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
Martin Luther King's Birthday	Monday, January 18, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
School (Spring) Holidays	Monday, March 7, through Saturday, March 12, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
Memorial Day	Monday, May 30, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)

2016-2017	-	Formatted: Space After: 18 pt, Pattern: Clear (White)
Independence Day Holiday	Friday July 4, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
Labor Day	Monday September 5, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
Thanksgiving Day College Holiday	Thursday November 24, 2016 Friday November 25, 2016	Formatted: Space After: 18 pt, Pattern: Clear (White)
Holiday Break	Friday December 23, 2016 College Closed at noon through Monday January 2, 2017	Formatted: Space After: 18 pt, Pattern: Clear (White)
Martin Luther King's Birthday	Monday January 16, 2017	Formatted: Space After: 18 pt, Pattern: Clear (White)
School (Spring) Holidays	Monday March 6, 2017 through Saturday March 11, 2017	Formatted: Space After: 18 pt, Pattern: Clear (White)
Memorial Day	Monday May 29, 2017	Formatted: Space After: 18 pt, Pattern: Clear (White)

<del>2017-2018</del>	<del>-</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Independence Day Holiday</del>	<del>Tuesday July 4, 2017</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Labor Day</del>	<del>Monday September 4, 2017</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Thanksgiving Day College Holiday</del>	<del>Thursday November 23, 2017 Friday November 24, 2017</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Holiday Break</del>	<del>Friday December 22, 2017 College Closed at noon through Monday January 1, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Martin Luther King's Birthday</del>	<del>Monday January 15, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>School (Spring) Holidays</del>	<del>Monday March 5, 2018 through Saturday March 10, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Memorial Day</del>	<del>Monday May 28, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>



<del>2018-2019</del>	<del>-</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Independence Day Holiday</del>	<del>Wednesday July 4, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Labor Day</del>	<del>Monday September 3, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Thanksgiving Day College Holiday</del>	<del>Thursday November 22, 2018 Friday November 23, 2018</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Holiday Break</del>	<del>Friday December 24, 2018 College Closed at noon through Monday January 1, 2019</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Martin Luther King's Birthday</del>	<del>Monday January 21, 2019</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>School (Spring) Holidays</del>	<del>Monday March 4, 2019 through Saturday March 9, 2019</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>
<del>Memorial Day</del>	<del>Monday May 27, 2019</del>	<div>Formatted: Space After: 18 pt, Pattern: Clear (White)</div>

## **ATTACHMENT D**

Records Management and Retention  
Policy Approval  
(Policy #313)

# RECORDS MANAGEMENT AND RETENTION POLICY

## Memorandum #313 Records Management and Retention Policy

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Revised September 9, 2025  
Date Issued: November 15, 2010  
Approved by: President  
Policyholder: Office of General Counsel

### **Purpose**

The Purpose of this Records Management and Retention Policy (the “Policy”) is to:

- Establish accountability for College Records management and retention;
- Define certain terms relevant to College Records management and retention;
- Strengthen safeguards against the unauthorized or accidental disclosure of Confidential Records;
- Establish the length of time certain categories of College Records are required to be maintained and stored;
- Establish the time at which certain categories of College Records should be destroyed, absent exceptional circumstances, in order to allow for the preservation of records maintenance space; and
- Establish appropriate College Records destruction practices and processes.

The College’s records management and retention program shall, as appropriate, incorporate existing policies and procedures, as described herein. For the definitions of capitalized terms contained in this Policy, see the “Definitions” section below.

### **Policy**

The Community College of Philadelphia (“CCP” or the “College”) is committed to complying with applicable laws and best practices with regard to the College Records it maintains, and to applying those laws and practices consistently across College Offices. This Policy applies to all College employees, both faculty and staff, as well as non-employees (such as contractors and/or volunteers), who conduct business on behalf of the College. Failure to comply with this Policy may result in disciplinary action (up to and including termination) and/or legal action. Known or suspected non-compliance with this Policy (e.g. known or suspected destruction of College Records that are required by this Policy to be retained)

should be promptly reported to the General Counsel. Reports can also be made to the College's hotline at: 1-888-261-1669 or [www.ethicspoint.com](http://www.ethicspoint.com).

This Policy requires the following:

- College Records will be retained for as long as required by law and the College's Records Retention Schedule (Attachment "A"), in a responsible and secure manner;
- College Records will be easily accessible and retrievable in a timely manner throughout their Required Retention Period;
- College Records will be disposed of after expiration of the Required Retention Period in accordance with the College's destruction procedures; and
- Records with potential historical value to the College, but for which the Required Retention Period has expired, will be determined by General Counsel with approval of the President. General Counsel will perform an appraisal to ensure that records deemed to have enduring historical, administrative, legal, or fiscal value are preserved.

Questions about this Policy should be directed to the General Counsel, unless otherwise indicated herein.

## **Definitions**

### **College Business**

Any transaction or regularly conducted activity of the College.

### **College Office**

Refers to any academic or administrative unit of the College.

### **College Record**

Information in any medium (paper, electronic, etc.) and in any form (documents, papers, correspondence, plans, photographs or audio or video recordings, etc.) generated at any time, at any location, in connection with College business. Personal papers of an employee that are unrelated to the function of that person's academic or administrative unit, including scholarly materials produced by faculty and other materials unconnected to College activities, are expressly excluded from the definition of College Records.

### **Confidential Record**

The following types of College Records are considered Confidential Records:

- "Education records" as defined by the Family Educational Rights and Privacy Act of 1974 as amended ("FERPA");
- Individual personnel or employment records, including records which concern hiring, appointment, promotion, demotion, transfer, tenure, compensation, performance, layoff, termination, or other circumstances of employment;

- "Treatment records" as defined by FERPA and/or records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 ("HIPAA");
- Records the use of which has been restricted by contract;
- Records which might expose the College to legal liability if treated as non-confidential; and
- Any records containing personal information or restricted personal information as defined by the College's [Personal Information Privacy and Protection Policy](#) (Policy #320).

### **Duplicate Record**

A copy of a College Record maintained by a College Office other than the Responsible Office.

### **Electronic Record**

Any College Record that is created, received, maintained and/or stored on College local workstations or central servers, regardless of the application used to create that Record. Examples of Electronic Records include, but are not limited to, electronic mail, word processing documents, scanned documents, spreadsheets, and databases. Unless otherwise specifically set forth in this Policy, maintenance and disposition of Electronic Records shall proceed on the same basis as Paper Records.

### **Originating Office**

The College Office where a College Record is first created or received from a sender external to the College.

### **Paper Record**

Any College Record maintained in a hard copy paper format, regardless of whether the record was originally created on paper or as an Electronic Record.

### **Required Retention Period**

The retention period set forth in the College's Records Retention Schedule (Attachment "A").

### **Responsible Office**

The College Office responsible for ensuring that a particular College Record is maintained for the Required Retention Period. Where multiple College Offices are responsible for action related to a single College Record, those Offices should agree as to which will be responsible for record retention and destruction in order to minimize the number of copies kept, while ensuring that College Records are retained as required.

### **Records Management Coordinator**

College employee(s) within the Responsible Office who are responsible for:

- developing and/or maintaining practices and procedures to ensure their College Office is meeting its record retention responsibilities under this Policy;
- coordinating retention, preservation, and destruction of records in accordance with this Policy, and secure storage of electronic and physical records in accordance with the [Personal Information Privacy and Protection Policy](#) (Policy #320) and other data security policies and practices of the College;
- ensuring employees in their College Office comply with the Policy and reporting any known or suspected non-compliance; and
- logging, tracking, and ensuring compliance with any litigation hold directives or similar (described further below).

The Records Management Coordinator is the head of the Responsible Office or their assigned designee.

## **Managing and Maintaining College Records**

### **Digitizing Paper Records**

With prior approval of the General Counsel, College Records may be scanned and converted to Electronic Records for the purpose of reducing storage costs and/or improving access to the information. It is essential that all significant details of the original Paper Record be included in the new Electronic Record. The reformatting process must be documented and the original Paper Record discarded. Digitization without preservation of the original Paper Record is *not* permitted if digitization would affect the legal status of the original Paper Record (e.g. wills, and certain legal notices). This is why prior approval of the General Counsel is essential before pursuing digitization projects. Note that simply scanning College Records into an empty drive will not be approved; there must be a system in place to ensure that the now-Electronic Records are organized, and that there are appropriate safeguards in place to prevent unauthorized access to and/or modification of the College Records.

### **Safeguarding Against Unauthorized or Accidental Disclosure**

Until College Records are properly disposed in accordance with the Records Retention Schedule, each College employee is accountable for securing and maintaining the College Records of their College Office, regardless of format or location. Each College Office shall designate a Records Management Coordinator who is accountable for ensuring that employees and others within the College Office are compliant with this Policy, and that individuals are granted access to Confidential Records only when such access is essential to the performance of their duties. Further, each Records Management Coordinator is responsible for ensuring that reasonable safeguards are in place to protect Confidential Records, and ensuring that individuals within the College Office are trained in this Policy and the relevant information security protocols. At all times documents containing personal information or restricted personal information as defined by the [Personal Information Privacy and Protection Policy](#) (Policy #320) must be maintained in compliance with that policy and with privacy and data security law, including satisfying all security

expectations for storing and transmitting Electronic Records and Paper Records, respectively, which contain personal information. In the event of a breach which could lead to the unauthorized or accidental disclosure of Confidential Records or personal information or restricted personal information more generally, an immediate report must be made to the General Counsel and the Associate Vice President, Information Technology, in accordance with that policy.

Depending on the Records involved, the College's records storage area may be located off-site, in the "Vault," or another location on campus. Supervision of the College's records storage area lies with the Vice President for Business and Finance.

### **Adhering to the Records Retention Schedule**

The Records Retention Schedule sets forth the length of time College Records should be retained by the Responsible Office. See [Attachment A](#).

The General Counsel should be notified of any College Records not encompassed within the Records Retention Schedule. The General Counsel will determine, in consultation with appropriate personnel, whether to destroy the College Records in question, or add those College Records to the Records Retention Schedule.

Recognizing that the Responsible Office must maintain College Records in accordance with the Records Retention Schedule, Duplicate Records should be destroyed and disposed of as early as practical once no longer necessary to the operation of the College Office maintaining the Duplicate Record.

Certain categories of College Records are subject to a "review annually" Required Retention Period. Personnel in the Originating Office, in coordination with the Records Management Coordinator, will review those files annually, disposing of College Records that are no longer necessary for or relevant to the operation of the Originating Office.

### **Extending the Required Retention Period**

College Records which have been retained beyond the Required Retention Period should be destroyed and disposed of, in accordance with this Policy, as early as practical.

### **Authorizing Destruction of College Records**

Destruction of Electronic Records will be a coordinated effort between the Responsible Office and the Office of Information Technology Services. When the Required Retention Period for Electronic Records expires, the Responsible Office will initiate the process for the Records' destruction and disposal. The destruction of those Electronic Records will be authorized jointly by the head of the Responsible Office and the Chief Information Officer. If those individuals are unable to agree, destruction will be stayed pending review and final determination by the General Counsel.

Paper Records which are no longer needed by the Responsible Office for the day-to-day operation of that Office may be identified by employees within the Responsible Office and transferred to the College's records storage areas. When the Required Retention Period for those Records expires, the Responsible Office shall initiate the process for the Records' destruction and disposal. The destruction of those Records shall be authorized jointly by the Vice President for Business and Finance and the head of the Responsible Office. If those individuals are unable to agree, destruction will be stayed pending review and final determination by the General Counsel.

If Paper Records are still located within the Responsible Office as of the expiration of the Required Retention Period applicable to them, the Records Management Coordinator of the Responsible Office will initiate the process for the Records' destruction and disposal. The destruction of those Records shall be authorized by the head of the Responsible Office.

### **Safely and Securely Disposing of College Records**

All Paper Records covered by the Records Retention Schedule shall be destroyed by shredding. All Electronic Records covered by the Records Retention Schedule shall be destroyed by or under the supervision of the Chief Information Officer or their designee.

### **Certifying Destruction of College Records**

Upon destruction of Electronic or Paper Records, the individual responsible for the destruction must complete a Certificate of Destruction containing an inventory describing and documenting every Record, in any format, that has been authorized for destruction, as well as the date and method of destruction. See [Attachment B](#).

The Certificate of Destruction will also identify the individual who was responsible for the Record's destruction. The Certificate itself shall not contain confidential information. Two (2) copies of the Certificate of Destruction will be retained permanently: one in the Responsible Office and one stored electronically by the Office of Information Technology. The Responsible Office's Certificate of Destruction may be retained in paper, digital, or other format.

### **Suspending the Records Retention Schedule: Litigation Hold Directives**

When litigation involving the College or its affiliates is filed or threatened, the law imposes a duty upon the College to preserve all Records that pertain to the issues involved. Once aware that litigation exists or is likely to be commenced, the College's General Counsel will issue a litigation hold directive to appropriate personnel. The litigation hold directive overrides the Records Retention Schedule. Records that may have otherwise been identified for destruction by the Records Retention Schedule should *not* be destroyed until the litigation hold directive has been lifted by the General Counsel. The suspension applies equally to Paper and Electronic Records, including Duplicate Records. No College employee who has been notified by the General Counsel of a litigation hold directive may alter or destroy a Record that falls within the scope of that litigation hold directive.



Any College employee who becomes aware of litigation or threatened litigation prior to receiving a litigation hold directive shall inform the General Counsel immediately and shall suspend the Records Retention Schedule until either (a) a litigation hold directive, defining the scope of the suspension, is issued by the General Counsel; or (b) the employee receives confirmation from the General Counsel that no litigation hold directive will be issued.

## **Related Policy**

[Personal Information Privacy and Protection Policy](#) (Policy #320) (hyperlink)  
[Right to Know Act](#) (Policy #311) (hyperlink)

# RECORDS MANAGEMENT RETENTION POLICY - ATTACHMENT A

Records may be kept in either paper or electronic format consistent with the Policy unless a specific format is legally required. Historic documents shall be maintained in paper/hard copy format, or the original format of the historic document.

## I. General Documents

Nature of Record	Responsible Office	Required Retention
1.1. Correspondence – Administrative (i.e. containing significant information about the College)	Originating Office	Ten Years
1.2. Correspondence – Executive (i.e. regarding significant events or the development of the College's administrative structure, policies and procedures)	Originating Office	Permanent
1.3. Correspondence – General (i.e. containing no significant information relating to the College)	Originating Office	One Year
1.4. Event Files	Originating Office	Review annually

1.5. Outside Board, Commission, Association and Membership Organization Information	Originating Office	Five years from the expiration of the commitment for those documents reflecting a defined commitment to the organization; Three years for all others
1.6. Personal Files (e.g. hot topics, special projects, tasks)	Originating Office	Review annually
1.7. Releases and Waivers (e.g. Weight Room Release Forms, Activity/Trip Releases and Waivers, etc.)	Department Head	Seven years from the date of the subject activity or, if the waiver or release pertains to a minor, when the minor turns 25
1.8. Speeches	Originating Office	Review annually

## II. Office of the President Documents

### President's Office

Nature of Record	Responsible Office	Required Retention
2.1. Board of Trustees Documents	President's Office	Permanent
2.2. Cabinet Meeting Minutes	President's Office	Permanent

2.3. Calendars	President's Office	Ten Years
2.4. Committee Recommendation Approvals	President's Office	Permanent
2.5. Community College Plan and Amendments	President's Office	Permanent
2.6. Government Affairs Files	President's Office	Five years
2.7. Institutional Policies and Manuals	President's Office	Permanent
2.8. Internal Audit (Report)	President's Office	Ten years
2.9. Internal Audit (Work Papers)	President's Office	Three years
2.10. Presentations and Speeches	President's Office	Permanent
2.11. Strategic Plans and Planning Documents	President's Office	Permanent

**Chief Engagement Office**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
2.12. Annual Report of Legislative Requests	Government Relations	Permanent
2.13 Draft and Proposed Legislation	Government Relations	Review annually
2.14. External Government Relations Meeting Minutes	Government Relations	Permanent

**III. Office of General Counsel Documents****General Counsel**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
3.1. Collective Bargaining Agreements	General Counsel	Permanent

3.2. Collective Bargaining Materials – Drafts	General Counsel	Until conclusion of next CBA negotiating cycle
3.3. Collective Bargaining Materials – Historical Documents	General Counsel	Permanent
3.4. Conflict of Interest Disclosures and Reviews	General Counsel	10 years
3.5. Litigation Files (includes subpoenas)	General Counsel	Ten years from termination of litigation or service of subpoena
3.6. President’s Personnel File	General Counsel	Six years from last date of President’s employment
3.7. Right to Know Law Documents (including requests)	General Counsel	Three years from date of response; If appeal is pending, records must be maintained through disposition of appeal (See 65 P.S. § 67.502)
3.8. Union Arbitration Decisions	General Counsel	Permanent
3.9. Union Grievance Files	General Counsel	Permanent
3.10. Union Information Requests	General Counsel	Three years from date of request

3.11. Union Settlement Agreements	General Counsel	Permanent
3.12. Whistleblower Reports and Reviews	General Counsel	10 years

### Equal Education and Employment Office

Nature of Record	Responsible Office	Required Retention
3.13. ADA Accommodation Files	Equal Education and Employment Office	Six years from last date of employment (See 29 C.F.R. §§ 516.5 and 516.6; 29 C.F.R. §§ 1602.14 and 1602.49)
3.14. Consent Agreements with U.S. Department of Education	Equal Education and Employment Office	Permanent
3.15. Discrimination Complaint Files (plus logs) (External) (non-Title IX)	Equal Education and Employment Office	Files: Seven years from resolution for; Logs: Permanent
3.16. Discrimination Complaint Files (plus logs) (Internal) (non-Title IX)	Equal Education and Employment Office	Files: Seven years from resolution; Logs: Permanent

3.17. Sexual Harassment Training (Online and In-Person) (Includes sign in sheets, attendance lists, completion lists, evaluation materials, and training materials, including all materials used to train Title IX Coordinators, investigators, decision-makers, and individuals who facilitate informal resolutions)	Equal Education and Employment Office	Seven years
3.18. Other Civil Rights Training (Online and In-Person) (Includes sign-in sheets, attendance lists, completion lists, training materials, and evaluation materials)	Equal Education and Employment Office	Seven years
3.19. Sexual Harassment Complaint Files (Title IX and Other) (External and Internal) (Includes reports, complaints, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, such as	Equal Education and Employment Office	Seven years unless subject is a minor in which case seven years after subject reaches age of majority (25)



supportive measures provided (or, if not provided, why this was not clearly unreasonable); sexual harassment investigation records (including determinations regarding responsibility, audio or audiovisual recordings or transcripts, disciplinary sanctions imposed, and remedies provided); appeals and appeals decisions; and informal resolutions.		
3.20. Vets 4212 Report	Equal Education and Employment Office	Five years (See 41 C.F.R. § 61-300)

#### IV. Division of Academic and Student Success

Nature of Record	Responsible Office	Required Retention
4.1 Academic Program Audit Materials	Provost/VP of Academic and Student Success	Eleven years (See 22 Pa. Code § 35.21)
4.2 Accreditation Documents (Program Level)	Dean of Program Area	Permanent

4.3 Academic Actions, Sanctions and Appeals	AVP, Student Success and Engagement and Dean of Students	Permanent for student dismissals; Five years from graduation or last date of attendance for all others
4.4 Allied Health (Student) Records	Dean, Math, Science and Health Careers	Seven years from graduation or last date of attendance
4.5 Articulation Agreements	Provost/VP of Academic and Student Success	Permanent
4.6 Affiliation Agreements	Provost/VP of Academic and Student Success	Seven years from expiration
4.7 Attendance Books (Students)	Originating Faculty Office	One year from conclusion of course
4.8 Athletic Eligibility Forms	Director of Athletics	Five years from graduation or last date of attendance
4.9 Clubs and Organizations - Registrations	Director of Student Engagement	Three years
4.10 Clubs and Organizations – Faculty Advisor Agreements	Director of Student Engagement	Three years

4.11 Coaching Agreements	Director of Athletics	Seven years from expiration of contract
4.12 Course/Curricula Documents	Dean of Program	Six years (See 22 Pa. Code § 35.21)
4.13 Course-related Faculty Materials (e.g. examinations / tests, term papers)	Department Heads	One year from end of course, unless the subject of a student grievance/complaint, appeal, or similar, in which case maintain for retention period associated with that secondary process
4.14 Department and Division Manuals (including Degree Requirements)	Department Heads	Permanent
4.15 Department Evaluation Plan	Provost/VP of Academic and Student Success	Ten years from date of revision
4.16 Departmental Meeting Minutes	Department Heads	Permanent
4.17 Enrollment Statistics and Class Rosters / Lists (Course Level)	Department Heads	Permanent

4.18 Leadership Institute/Aspiring Leadership Fellowship Records	Provost/VP of Academic and Student Success	Review annually
4.19 Master Schedule	Provost/VP of Academic and Student Success/Information Technology	Permanent
4.20 Pedagogical Information (e.g. from Conferences)	Originating Offices	Review annually
4.21 Research Misconduct Records	Provost/VP of Academic and Student Success	Seven years
4.22 Standards for Grading and Qualifications for Graduation	Provost/VP of Academic and Student Success	Permanent (See 22 Pa. Code § 35.26)
4.23 Student ADA Accommodation Files	Center on Disability	Five years from graduation or last date of attendance
4.24 Student Complaint Files	Dean over Originating Office	Five years from graduation or last date of attendance

4.25 Student Discipline	Assistant Dean of Students	Ten years from date of incident; Permanent if student expelled
4.26 Student Life – Programming and Evaluations	Director of Student Engagement	Three years
4.27 Syllabi	Division Offices	Six years (See 22 Pa. Code § 35.21)
4.28 Teaching Evaluations (by Students)	Department Heads	Five years for all instructors; If tenure review pending or not yet commenced, maintain until tenure review process is complete. If evaluations are submitted to an employment file and/or tenure dossier, they become a part of those records and will be retained for the period designated for those records.
4.29 Tenure and promotion dossiers	Provost/VP of Academic and Student Success	Ten years after separation of the faculty member

## V. Division of Strategic Initiatives and Community Engagement

Nature of Record	Responsible Office	Required Retention
5.1 ABLE Records	Dean, Adult and Community Education	See program-specific requirements; in the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and Family Literacy Education, Adult Education and Family Literacy Guidelines (Program Year 2022-2023), § 616))
5.2 ESL Records (Non-Credit)	Dean, Adult and Community Education	See program-specific requirements; In the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and Family Literacy Education, Adult Education and Family Literacy Guidelines (Program Year 2022-2023), § 616)

5.3	GED Records	Dean, Adult and Community Education	See program-specific requirements; In the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and Family Literacy Education, Adult Education and Family Literacy Guidelines (Program Year 2022-2023), § 616)
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## VI. Division of Enrollment Management and Strategic Communications

### Enrollment Management: Admissions, Financial Aid, Records and Registration, Student Tuition Services

Nature of Record	Responsible Office	Required Retention
6.1 20% Attendance Reports	Director, Student Records and Registration	Permanent
6.2 50% Attendance Reports	Director, Student Records and Registration	Permanent

6.3 Act 48 Credit/Hour Certificates	Director, Student Records and Registration	Six years from conclusion of course (See 24 P.S. § 1205.2)
6.4 ACT/SAT/TOEFL Exam and Score Reports	Director of Admissions	Five years from graduation or last date of attendance; Three years from receipt for individuals who do not enroll
6.5 Admissions Documents (enrolled students)	Director of Admissions	Five years from graduation or last date of attendance
6.6 Admissions Documents (individuals who do not enroll)	Director of Admissions	Three years
6.7 Amnesty Forms (Academic)	Director, Student Records and Registration	Permanent
6.8 Amnesty Forms (Time)	Director, Student Records and Registration	Permanent
6.9 Application/Registration for Non-Credit Enrollment	Director, Student Records and Registration	Five years from last date of attendance



6.10 Change of Curriculum Forms and Authorizations	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.11 Change of Final Grade Forms	Director, Student Records and Registration	Permanent
6.12 Change of Information Forms (including changes to identification numbers)	Director, Student Records and Registration	Five years after graduation or last date of attendance
6.13 Credit by Examination Forms	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.14 Credit for Life Experience Forms	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.15 Degree Audit Records	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.16 Drop/Add/Withdrawal Forms	Director, Student Records and Registration	Five years from graduation or last date of attendance

6.17 Federal Family Education Loan Program and Direct Loan Program Records	Director, Financial Aid	Records relating to a student or parent borrower's eligibility and participation must be retained for three years after the award year during which the student last attended the College (34 C.F.R. § 668.24(e)(2)(i)) Other records relating to the College's participation in the FFEL or Direct Loan Program, including records of any other reports or forms, must be retained for three years after the award year in which the records are submitted (34 C.F.R. § 668.24(e)(2)(ii))
6.18 Federal Student Aid Audits, Program Reviews and Investigations	Director, Financial Aid	If any Title IV loan, claim or expenditure is questioned by a Title IV program audit, program review, investigation or other review, the records must be maintained for the longer of the applicable Required Retention period or until the expenditure issue is resolved with the U.S. Department of Education (34 C.F.R. § 668.24(e)(3))
6.19 Federal Work Study	Director, Financial Aid	Records relating to administration of the program must be retained for three years after submission of the Fiscal Operations Report for the award year (34 C.F.R. § 668.24(e))
6.20 Fee Waiver	Director of Admissions	Five years from graduation or last date of attendance

6.21 FERPA – Disclosure Requests	Director, Student Records and Registration	Permanent
6.22 FERPA – Disclosures	Director, Student Records and Registration	Permanent
6.23 FERPA – Student’s Consent for Records Disclosure	Director, Student Records and Registration	Permanent
6.24 FERPA – Student Requests for Nondisclosure of Directory Information	Director, Student Records and Registration	Permanent
6.25 Final Grade Reports	Director, Student Records and Registration	Permanent
6.26 Foreign Student Records (F-1 visas)	Director of Admissions	Three years after student’s last date of attendance (8 C.F.R. § 214.3(g))
6.27 G.P.A. Maintenance Documents	Director, Student Records and Registration	Permanent

6.28 Graduation Lists	Director, Student Records and Registration	Permanent
6.29 Incomplete Grade Change Forms	Director, Student Records and Registration	Permanent
6.30 Pell Grant	Director, Financial Aid	Records relating to administration of program must be retained for three years after the award year (34 C.F.R. § 668.24(e))
6.31 Perkins Loan Program	Director, Financial Aid	Records relating to administration of program must be retained for three years after the award year (34 C.F.R. § 668.24(e)) Disbursement and electronic authentication and signature records for each loan made using a Master Promissory Note must be retained for three years from the date the loan is canceled, repaid or otherwise satisfied (34 C.F.R. § 674.19(e)(3)(ii)) Repayment records, including cancellation and deferment requests must be retained, for three years from the date on which a loan is assigned to the Secretary of Education, canceled or repaid (34 C.F.R. § 674.19(e)(3)(ii))

6.32 Registration Reinstatement Requests	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.33 Requests for Fee Waivers	Director of Admissions	Five years from graduation or last date of attendance
6.34 Requests for Tuition Refund/Letter of Credit	Director, Student Records and Registration	Five years from graduation or last date of attendance
6.35 Scholarship Files (Recipient)	Director, Financial Aid	Five years from last disbursement
6.36 Student Death Certificates	Director, Student Records and Registration	Permanent
6.37 Student Long-Term Historical Records (includes permanent resident card, birth certificate, marriage certificate, ward of the court/orphan confirmation, verification/citizenship verification))	Director, Financial Aid	Ten years
6.38 Supplemental Educational Opportunity Grant Program	Director, Financial Aid	Records relating to administration of program must be retained for three years from the submission of the Fiscal

		Operations Report for the award year (34 C.F.R. § 668.24(e))
6.39 Transcript Request Forms	Director, Student Records and Registration	One year
6.40 Transcripts	Director, Student Records and Registration	Permanent
6.41 Transcripts from Other Postsecondary Institutions	Director, Student Records and Registration	Five years from graduation or last date of attendance for enrolled students; Three years from notification of rejection for others
6.42 Transcripts from Secondary Institutions (Dual Enrollment Students)	Director, Student Records and Registration	Permanent
6.43 Veterans Records	Director, Student Records and Registration	Three years from graduation or last date of attendance

## Institutional Research

Nature of Record	Responsible Office	Required Retention
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6.44 Enrollment Statistics (Program Level)	Director, Institutional Research	Permanent
6.45 Institutional Survey and Reporting Records (HEGIS/IPEDS)	AVP, Institutional Effectiveness	Permanent for final reports, surveys and forms

### **Strategic Communications: Communications, Marketing, Special Events and Community Relations, Brand Management**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
6.46 Advertisements and Commercials	Marketing and Creative Services	Permanent
6.47 College Catalogs	Strategic Communications	Permanent
6.48 College Website	Marketing and Creative Services	Permanent
6.49 CNews	Communications	Permanent
6.50 HTML Emails	Communications	Permanent

6.51 Event Folders (excluding contracts)	Special Events and Community Relations	Review annually
6.52 Facilities Contracts for Outsiders to Use CCP	Special Events and Community Relations	Five years from expiration of contract
6.53 Institution Publications	Communications	Permanent
6.54 Legislative Requests and Responses	Marketing and Government Relations	Two years
6.55 Drafts of Marketing Materials	Marketing and Creative Services	Review annually
6.56 Marketing Plans	Marketing and Creative Services	Permanent
6.57 Marketing Publications	Marketing and Creative Services	Permanent
6.58 Marketing Research	Marketing and Creative Services	Review annually
6.59 Materials to Respond to Crisis Inquiries	Communications	Until updated or superseded



6.60 Event Photos and Video Footage	Special Events and Community Relations	Review Annually
6.61 Photo Release Forms (Marketing Purposes)	Marketing and Creative Services	Permanent
6.62 Press Clippings (of interest to CCP)	Communications	Review annually
6.63 Press Releases	Communications	Permanent
6.64 Talking Points, Statements, Prepared Remarks, Notes, etc. (non-published)	Communications	Review annually
6.65 Trademark	Brand Management and Operations	Permanent

## VII. Division of Business and Finance

### Budget and Financial Services

Nature of Record	Responsible Office	Required Retention
7.1 Annual Budget	Budget Office	Permanent

7.2 Bookstore Commission Reports	Budget Office	Current plus seven years
7.3 Budget (Approved)	Budget Office	Permanent
7.4 Certificates of Insurance (College)	Budget Office	Five years from expiration
7.5 Certificates of Insurance (Vendor)	Budget Office	Five years from expiration
7.6 Insurance – Closed Claims (no litigation)	Budget Office	Seven years or until claimant turns 25 years of age, whichever is later
7.7 Insurance Policies (including proof of payment of premiums)	Budget Office	Permanent
7.8 Settlements (records of and proof of payment)	Budget Office	Permanent
7.9 Parking Records (e.g. receipts, permit applications, monthly vendor reports)	Budget Office	Current plus seven years

**Business Services**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
7.10 Shipping Records (e.g. Federal Express, UPS)	Mailroom	Three years

**Controller**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
7.11 Accounts Payable Records	Controller	Current plus seven years
7.12 Accounts Receivable Records	Controller	Current plus seven years
7.13 Annual Financial Statements	Controller	Permanent
7.14 Audit Reports	Controller	Permanent
7.15 Bank Statements and Cancelled Checks	Controller	Current plus seven years

7.16 Banner End of Year Instructions	Controller	Current
7.17 Banner Training Materials	Controller	Current
7.18 Bills and Payment Records	Controller	Current plus seven years
7.19 Books of Account	Controller	Current plus seven years
7.20 Deposit Slips	Controller	Current plus seven years
7.21 Fixed Asset Records	Controller	Permanent
7.22 Form 990	Controller	Three years from last date for filing
7.23 Invoices	Controller	Current plus seven years
7.24 Payroll Documents	Controller	Current plus seven years
7.25 Payroll – Records	Controller	Current plus seven years
7.26 P-Card Transaction Receipts/Images	Controller	Seven years from the date of transaction

7.27 Records Supporting Items of Income, Deductions and Credits	Controller	Current plus seven years
7.28 State Audit	Controller	Permanent
7.29 State Audit Appeals	Controller	Permanent
7.30 Travel Reimbursements	Controller	Current plus seven years
7.31 Tuition Remission	Controller	Five years from graduation or last day of attendance
7.32 Wire Transfer Files	Controller	Current plus seven years

## Facilities

Nature of Record	Responsible Office	Required Retention
7.33 Building Automation Systems	Director, Facilities and Construction Management	Five years
7.34 Building Specifications for Contracts (e.g. weight control)	Director, Facilities and Construction Management	Permanent

7.35 CAD Drawings	Director, Facilities and Construction Management	Five years after disposition of property
7.36 Construction – Building Plans, Blueprints and Design Plans	Director, Facilities and Construction Management	Permanent
7.37 Construction – Engineering Studies and Reports	Director, Facilities and Construction Management	Permanent
7.38 Construction – General File Materials	Director, Facilities and Construction Management	Five years from project completion
7.39 Construction – Licenses and Permits	Director, Facilities and Construction Management	Permanent
7.40 Equipment Maintenance	Director, Facilities and Construction Management	Three years after disposition of equipment
7.41 Environmental Health and Safety Records (asbestos, chemical or blood borne pathogen exposure)	Director, Facilities and Construction Management	Thirty Years

7.42 Leases	Director, Facilities and Construction Management	Five years from expiration of lease
7.43 Operations Manuals	Originating Office	Permanent
7.44 Payroll – Individual Time Reports	Originating Office	Current plus seven years
7.45 Safety Equipment Testing Records (fire extinguishers, eye wash stations, fume hoods, etc.)	Director, Facilities and Construction Management	Three Years
7.46 SDS Forms	Director, Facilities and Construction Management	Thirty years
7.47 Vehicle Leases	Director, Facilities and Construction Management	Five years after expiration
7.48 Vehicle Maintenance Records	Director, Facilities and Construction Management	Five years after disposition of vehicle
7.49 Work Orders (Service, Maintenance, Repairs)	Director, Facilities and Construction Management	One year

## Human Resources Documents

Nature of Record	Responsible Office	Required Retention
7.50 Benefit Plan Documents	Human Resources	Permanent
7.51 Employee Benefit Files	Human Resources	Six years from termination of employee's (former employee's) benefits
7.52 Employee Discipline Files	Human Resources	Six years from last date of employment
7.53 Employee and Faculty Handbooks	Human Resources	Permanent
7.54 Employee Relations Complaint Files (aka non-union Faculty and Employee Grievances) (not resulting in litigation; excluding discrimination and harassment)	Human Resources	Six years from last date of employment



7.55 Faculty Extended/Released Time Project Record	Human Resources	Six years from last date of employment
7.56 FMLA and Other Leave Records	Human Resources	Six years (Note that regulations identify documents that must be maintained for the retention period. See, e.g., 29 C.F.R. § 825.500)
7.57 Higher Education Staff Information Report (EEO-6)	Human Resources	Three years from filing date (29 C.F.R. § 1602.50)
7.58 I-9 Forms	Human Resources	Three years from date of hire or one year from last date of employment, whichever is later (8 C.F.R. § 274a.2(b)(2))
7.59 Materials for Future Employee Handbooks	Human Resources	Review annually
7.60 Organizational Development	Human Resources	Permanent
7.61 Pennsylvania New Hire Report	Human Resources	Three years from filing date
7.62 Personnel Files (including application, resume, appointment/salary	Human Resources	Six years from last date of employment (See 29 C.F.R. §§ 516.5 and 516.6; 29

forms, contracts, performance evaluations, etc.)		C.F.R. §§ 1602.14 and 1602.49; 29 C.F.R. § 1620.32; 29 C.F.R. § 1627.3)
7.63 Pre-Employment Records For Applicants Who Are Not Hired (e.g. applications, resumes, interview notes, etc.)	Human Resources	Three years from date of rejection notification or creation of record, whichever is later
7.64 Clearances and Background Checks (e.g. child abuse clearances)	Human Resources	Six years from last date of employment
7.65 Sabbatical Files	Human Resources	Six years from last date of employment
7.66 Spreadsheets for Paying for Advising	Human Resources	Six years (See 29 C.F.R. §§ 516.5 and 516.6)
7.67 Statistical Data Reports re: Employees	Human Resources	Ten years
7.68 Temporary Employee Files	Human Resources	Six years from last date of employment (See 29 C.F.R. §§ 516.5 and 516.6; 29 C.F.R. §§ 1602.14 and 1602.49; 29 C.F.R. § 1620.32; 29 C.F.R. § 1627.3)
7.69 Training	Human Resources	Review annually

7.70 Unemployment Compensation Records	Human Resources	Five years from date last contribution relating to the record has been paid (See 43 P.S. § 766)
7.71 Worker's Compensation Records	Human Resources	Ten years
7.72 Work Study Student Employee Files	Human Resources	If Federal work study, three years from submission of the Fiscal Operations Report for the award year (34 C.F.R. § 668.24(e); If not Federal work study, three years from graduation or the last date of attendance.

### Information Technology Documents

Nature of Record	Responsible Office	Required Retention
7.73 Acceptable Use Forms (Employees)	Information Technology	Three years from last date of employment
7.74 Banner Implementation Information	Information Technology	Permanent
7.75 Banner Security Forms (Employees)	Information Technology	Three years from last date of employment

7.76 Blueprints	Information Technology	Permanent
7.77 Breach Notification Records	Information Technology	Seven years
7.78 Department Procedures	Information Technology	Permanent
7.79 Emergency Response Information	Information Technology	Permanent
7.80 IT Investigations Resulting in No Discipline	Information Technology	One year from closure of investigation
7.81 IT Investigations Resulting in Discipline	Information Technology	Five years from last date of last employment (employees) or date of last attendance (students)
7.82 Laptop Pool Sign-Out Form	Information Technology	One year
7.83 Master Schedule	Provost/VP of Academic and Student Success/Information Technology	Permanent

7.84 Remote Site Information (e.g. Wiring, Leases, Classroom Software)	Information Technology	Permanent
7.85 Snapshots of Databases	Information Technology	Permanent
7.86 Training Materials	Information Technology	Review annually

## Public Safety

Nature of Record	Responsible Office	Required Retention
7.87 Access Control System	Public Safety	Three years
7.88 After-Hours Sign-In Logbook	Public Safety	Three years
7.89 Crime Reporting – Documents Underlying and Required to Substantiate Pennsylvania Uniform Crime Reports	Public Safety	Four years (See 18 P.S. § 20.101, et seq. and 22 Pa. Code § 33.111)
7.90 Crime Reporting – Documents Underlying and	Public Safety	Seven years (See 20 U.S.C. § 1092(f)(1)(F); 34 C.F.R. § 668.24))

Required to Substantiate Federal Campus Crime Reports (Clery Act)		
7.91 ChildLine Reports regarding known or suspected child abuse	Public Safety	Until the subject reaches the age of majority plus seven years (25)
7.92 Digital Security Cameras	Public Safety	Overwritten every thirty days
7.93 Documents Underlying and Required to Substantiate Fire Safety Report	Public Safety	Five years (See 20 U.S.C. § 1092(i); 34 C.F.R. § 668.24)
7.94 Electronic Tour System	Public Safety	Three years
7.95 Emergency Response Team	Public Safety	Seven years
7.96 Health and Safety Equipment Testing (AEDs, etc.)	Public Safety	Three Years
7.97 Employee Disciplinary Records Relevant to Campus Security	Public Safety	Seven years from incident or six years from last date of employment, whichever is longer

(e.g. employee removed from campus)		
7.98 Identification Cards	Public Safety	Five years from graduation or last date of attendance
7.99 Incident Reports	Public Safety	Seven years or, if the subject is a minor, until they reach the age of majority plus seven years (25)
7.100 Lost and Found	Public Safety	Review annually
7.101 Pandemic Planning	Public Safety	Until updated or superseded

## Purchasing

Nature of Record	Responsible Office	Required Retention
7.102 Contracts and Related Correspondence	Director, Purchasing	Five years after expiration of contract (See 42 Pa. C.S. § 5525)
7.103 Purchase Orders	Director, Purchasing	Current plus seven years
7.104 Purchasing – Advertising	Director, Purchasing	Seven years

7.105 Purchasing – Bid Documents (Accepted)	Director, Purchasing	Seven years after completion
7.106 Purchasing – Bid Documents (Rejected)	Director, Purchasing	Three years from rejection
7.107 Requisition Files	Director, Purchasing	Current plus seven years
7.108 Vendor Files	Director, Budget and Financial Services	Review annually

### Other Business and Finance Records

Nature of Record	Responsible Office	Required Retention
7.109 Accreditation Documents (Institutional Level)	VP, Business and Finance	Permanent
7.110 Bond Records	VP, Business and Finance	Permanent
7.111 Budget Documents – City	VP, Business and Finance	Ten years
7.112 Budget Documents – State	VP, Business and Finance	Ten years



7.113 Deeds	VP, Business and Finance	Permanent
7.114 Facilities Master Plan	VP, Business and Finance	Permanent
7.115 Financial Statements	VP, Business and Finance	Permanent
7.116 Planning and Finance Goals	VP, Business and Finance	Permanent
7.117 Property Appraisals	VP, Business and Finance	Permanent

### **VIII. Division of Institutional Advancement Documents**

<b>Nature of Record</b>	<b>Responsible Office</b>	<b>Required Retention</b>
8.1 Accreditation Documentation, Including Self-Study	Institutional Advancement	Permanent NOTE: Background information necessary for self-study should be kept the longer of the retention period identified elsewhere in this retention schedule or eleven years

8.2 Alumni Membership Records	Institutional Advancement	As updated
8.3 Alumni Gift Entry Validation Reports	Institutional Advancement	Permanent
8.4 Alumni Council Records	Institutional Advancement	Permanent
8.5 Annual Donor Reports	Institutional Advancement	Permanent
8.6 Annual Finance Reports	Institutional Advancement	Permanent
8.7 Annual Giving Reports	Institutional Advancement	Permanent
8.8 Donor Gift files	Institutional Advancement	Permanent
8.9 Foundation Board Documents	Institutional Advancement	Permanent
8.10 Foundation Donor Endowment Agreements	Institutional Advancement	Permanent
8.11 Foundation Donor Checks	Institutional Advancement	Seven years from year in which donation made

8.12 Grant Administration Documents	Institutional Advancement	<p>Five years from the date the grantee submits its final expenditure report; if renewed quarterly or annually, then three years from submission of report (See 34 C.F.R. § 74.53(b))</p> <p>If the grant is the subject of any litigation, claim or audit started before the expiration of the five year period, then records must be maintained the longer of the retention period or until the issue is resolved and final action is taken (See 34 C.F.R. § 74.53(b)(1))</p> <p>Records for real property and equipment acquired with Federal funds shall be retained for five years after final disposition of property (See 34 C.F.R. § 74.53(b)(2))</p>
8.13 Scholarship Files (Recipient)	Institutional Advancement	Five years from last disbursement
8.14 Trusts and Bequests (Wills)	Institutional Advancement	Permanent

# RECORDS MANAGEMENT AND RETENTION POLICY

## Memorandum #313 Records Management and Retention Policy

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August 1, 2023 November 15, 2010 Revised September 9, 2025

Date Issued: November 15, 2010

Approved by: President

Policyholder: Office of General Counsel

### Purpose

The Purpose of this Records Management and Retention Policy (the "Policy") is to:

- ~~To~~ Establish accountability for College Records management and retention;
- ~~To~~ Define certain terms relevant to College Records management and retention;
- ~~To~~ Strengthen safeguards against the unauthorized or accidental disclosure of Confidential Records;
- ~~To~~ Establish the length of time certain categories of College Records are required to be maintained and stored;
- ~~To~~ Establish the time at which certain categories of College Records should be destroyed, absent exceptional circumstances, in order to allow for the preservation of records maintenance space; and
- ~~To~~ Establish appropriate College Records destruction practices and processes.

The College's records management and retention program shall, as appropriate, incorporate existing policies and procedures, as described herein that control reasonably foreseeable risks. For the definitions of capitalized terms contained in this Policy, see the "Definitions" section below.

### Policy

~~It is the policy of t~~The Community College of Philadelphia ("CCP" or the "College") is committed to complying with applicable laws and best practices with regard to the College Records it maintains, and to applying those laws and practices consistently across College Offices. This Policy applies to all College employees, both faculty and staff, as well

as non-employees (such as contractors and/or volunteers), who conduct business on behalf of the College. Failure to comply with this Policy may result in disciplinary action (up to and including termination) and/or legal action. Known or suspected non-compliance with this Policy (e.g. known or suspected destruction of College Records that are required by this Policy to be retained) should be promptly reported to the General Counsel. Reports can also be made to the College's hotline at: 1-888-261-1669 or [www.ethicspoint.com](http://www.ethicspoint.com).

This Policy requires the following:

- College Records will be retained for as long as required by law and the College's Records Retention Schedule (Attachment "A"), in a responsible and secure manner;
- College Records will be easily accessible and retrievable in a timely manner throughout their Required Retention Period;
- College Records will be disposed of after expiration of the Required Retention Period in accordance with the College's destruction procedures; and
- Records with potential historical value to the College, but for which the Required Retention Period has expired, will be determined by [General Counsel with approval of the President](#). [General Counsel will](#) perform an appraisal to ensure that records deemed to have enduring historical, administrative, legal, or fiscal value are preserved.

Questions about this Policy should be directed to the General Counsel, unless otherwise indicated herein.

## **Definitions**

### College Business

Any transaction or regularly conducted activity of the College.

### College Office

Refers to any academic or administrative unit of the College.

### College Record

Information in any medium (paper, electronic, etc.) and in any form (documents, papers, correspondence, plans, photographs or audio or video recordings, etc.) generated at any time, at any location, in connection with College business. Personal papers of an employee that are unrelated to the function of that person's academic or administrative unit, including scholarly materials produced by faculty and other materials unconnected to College activities, are expressly excluded from the definition of College Records.

### **"Confidential Record" –**

The following types of College Records are considered Confidential Records:

- "Education records" as defined by the Family Educational Rights and Privacy Act of 1974, as amended (["FERPA"](#));
- Individual [personnel or](#) employment records, including records which concern hiring, appointment, promotion, [demotion, transfer,](#) tenure, compensation, performance, [layoff,](#) termination, or other circumstances of employment;
- ["Treatment records" as defined by FERPA and/or R](#)records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 (["HIPAA"](#));
- Records the use of which has been restricted by contract;
- [Records which might expose the College to legal liability if treated as non-confidential;](#)
- ~~All administrative records of the College, with exceptions as specifically defined by the General Counsel, including those records which must be open in conformance with Pennsylvania's Right-to-Know Law, as amended; and~~
- ~~Records which might expose the College to legal liability if treated as non-confidential.~~
- [Any records containing personal information or restricted personal information as defined by the College's Personal Information Privacy and Protection Policy \(Policy #320\).](#)

### **Duplicate Record**

A copy of a [College](#) Record maintained by a College Office other than the Responsible Office.

### **Electronic Record**

Any [College](#) Record that is created, received, maintained and/or stored on College local workstations or central servers, regardless of the application used to create that Record. Examples of Electronic Records include, but are not limited to, electronic mail, word processing documents, scanned documents, spreadsheets, and databases. [Unless otherwise specifically set forth in this Policy, maintenance and disposition of Electronic Records shall proceed on the same basis as Paper Records.](#)

### **Originating Office**

The College Office where a [College](#) Record is first created or received from a sender external to the College.

### **Paper Record**

Any [College](#) Record maintained in a hard copy paper format, regardless of whether the [R](#)record was originally created on paper or as an Electronic Record.

### **Required Retention Period**

The retention period set forth in the College's Records Retention Schedule ([Attachment "A"](#)).

## Responsible Office

The College Office responsible for ensuring that a particular College Record is maintained for the Required Retention Period. Where multiple College Offices are responsible for action related to a single College Record, those Offices should agree as to which will be responsible for record retention and destruction in order to minimize the number of copies kept, while ensuring that College Records are retained as required.

## ~~Responsible Office~~ Records Management Coordinator ~~Liaison~~

College employee(s) within the Responsible Office assigned by the head of their academic or administrative unit and who are responsible for:

- developing and/or maintaining practices and procedures to ensure their College Office is meeting its record retention responsibilities under this Policy;
- coordinating retention, preservation, and destruction of records in accordance with this Policy, and secure storage of electronic and physical records in accordance with the Personal Information Privacy and Protection Policy (Policy #320) and other data security policies and practices of the College;
- ensuring employees in their College Office comply with the Policy and reporting any known or suspected non-compliance; and
- ~~serving as a point of contact~~ logging, tracking, and ensuring compliance ~~for~~ with any litigation hold directives or similar (described further below).

The Records Management Coordinator ~~is~~ the head of the Responsible Office or their assigned designee.

## ~~Procedures~~ Managing and Maintaining College Records ~~Electronic Records~~

### Digitizing Paper Records

With prior approval of the General Counsel, College Records may be scanned and converted to Electronic Records for the purpose of reducing storage costs and/or improving access to the information. It is essential that all significant details of the original Paper Record ~~must~~ be included in the new Electronic Record. The reformatting process must be documented and the original Paper Record discarded. Digitization without preservation of the original Paper Record is *not* permitted if digitization would affect the legal status of the original Paper Record (e.g. wills, and certain legal notices). This is why prior approval of the General Counsel is essential before pursuing digitization projects. Note that simply scanning College Records into an empty drive will not be approved; there must be a system in place to ensure that the now-Electronic Records are organized, and that there are appropriate safeguards in place to prevent unauthorized access to and/or modification of the College Records.

~~Unless otherwise specifically set forth in this Policy, maintenance and disposition of Electronic Records shall proceed on the same basis as Paper Records.~~

### Managing Email Responsibly

Given the prevalence of email communication, recognizing when an email constitutes a College Record for which retention is required is essential. Employees should treat emails the same as they would hard copy letter correspondence: if the paper letter should be preserved, so too should the email. Most emails are transitory in nature; ~~they~~ will not be required to be retained and can be destroyed by deletion. However, prior to deleting any email, the employee should review the content of the email and determine whether it is a College Record required to be retained under the Records Retention Schedule, or due to a litigation hold directive (discussed further below). If so, the email should not be deleted and care should be taken that emails requiring preservation are not inadvertently deleted in connection with batch deletions for emails of a certain age, in connection with auto-updates, and similar ~~deletions~~.

### **Safeguardings Against Unauthorized or Accidental Disclosure**

Until College Records are properly disposed in accordance with the Records Retention Schedule, each Office of the College employee is accountable for securing and maintaining theirs College Records of their College Office, regardless of format or location. ~~Each College Office will be assigned~~ shall designate a Records Management Liaison Coordinator who is accountable for ensuring that employees within the Office, and others within the College Office, are compliant with this Policy, and that the privacy of College Records is maintained, with individuals only being granted access to Confidential Records only when such access is essential to the performance of their duties. ~~Further, each Records Management Liaison Coordinator is responsible for ensuring that reasonable safeguards are in place to protect Confidential Records, and Office must ensure that individuals within the College Office those granted access are trained in this Policy and the relevant information security protocols employ reasonable safeguards to protect the Confidential Records. At all times documents containing personal information or restricted personal information as defined by the Personal Information Privacy and Protection Policy (Policy #320) must be maintained in compliance with that policy and with privacy and data security law, including satisfying all security expectations for storing and transmitting Electronic Records and Paper Records, respectively, which contain personal information. In the event of a breach which could lead to the unauthorized or accidental disclosure of Confidential Records or personal information or restricted personal information more generally, an immediate report must be made to the General Counsel and the Associate Vice President, Information Technology, in accordance with that policy.~~

Depending on the Records involved, the College's records storage area may be located off-site, in the "Vault," or another location on campus. Supervision of the College's records storage area lies with the Vice President for ~~Planning~~ Business and Finance.

### **Adhering to the Records Retention Schedule**

The Records Retention Schedule sets forth the length of time College Records should be retained by the Responsible Office. See Attachment A.



The General Counsel should be notified of any College Records not encompassed within the Records Retention Schedule. The General Counsel will determine, in consultation with appropriate Department personnel, whether to destroy the College Records in question, or add those College Records to the Records Retention Schedule.

Recognizing that the Responsible Office must maintain College Records in accordance with the Records Retention Schedule, Duplicate Records should be destroyed and disposed of as early as practical once no longer necessary to the operation of the College Office maintaining the Duplicate Record.

Certain categories of College Records are subject to a "review annually" Required Retention Period.- Personnel in the Originating Office, in coordination with the Records Management Coordinator, will review those files annually, disposing of College Records that are no longer necessary for or relevant to the operation of the Originating Office.

#### **Extending the Required Retention Period**

College Records which have been retained beyond the Required Retention Period should be destroyed and disposed of, in accordance with this Policy, as early as practical. That said, a Responsible Office is permitted to extend the Required Retention Period for College Records until December 31 of the year of destruction if doing so would enable the Responsible Office to destroy all College Records for which the Required Retention Period is expiring in a year in one transaction. Put another way, if a Responsible Office has College Records in its possession for which the Required Retention Period will expire at various times throughout the year, it is acceptable for the Responsible Office to delay destruction for some of the College Records as long as all have been destroyed by December 31.

#### **Authorizing Destruction of College Records Authorization**

Destruction of Electronic Records will be a coordinated effort between the Responsible Office and the Office of Information Technology Services. -When the Required Retention Period for Electronic Records expires, the Responsible Office will initiate the process for the Records' destruction and disposal. -The destruction of those Electronic Records will be authorized jointly by the senior officer in head of the Responsible Office and the Chief Information Officer. -If those individuals are unable to agree, destruction will be stayed pending review and final determination by the General Counsel.

Paper Records which are no longer needed by the Responsible Office for the day-to-day operation of that Office may be identified by Department staff/employees within the Responsible Office and transferred to the College's records storage areas. When the Required Retention Period for those Records expires, the Responsible Office shall initiate the process for the Records' destruction and disposal. -The destruction of those Records shall be authorized jointly by the Vice President for Planning/Business and Finance and the senior officer/head of the Responsible Office. If those individuals are unable to agree, destruction will be stayed pending review and final determination by the General Counsel.

~~If those individuals are unable to agree, destruction will be stayed pending review and final determination by the General Counsel.~~ If Paper Records are still located within the Responsible Office as of the expiration of the Required Retention Period applicable to them, the ~~senior officer~~ Records Management Coordinator of the Responsible Office will initiate the process for the Records' destruction and disposal. The destruction of those Records shall be authorized by the head of the Responsible Office.

### **Safely and Securely Disposing of College Records**

All Paper Records ~~constituting Confidential Records~~ covered by the Records Retention Schedule shall be destroyed by shredding. ~~All Paper Records that are not Confidential Records should be recycled.~~ All Electronic Records covered by the Records Retention Schedule shall be destroyed by or under the supervision of the Chief Information Officer or their designee.

### **Certifying Destruction of College Records** ~~[Certificate of Destruction]~~

Upon destruction of Electronic or Paper Records, the individual responsible for the destruction must complete a ~~The~~ Certificate of Destruction containing ings an inventory describing and documenting every Record, in any format, that has been authorized for destruction, as well as the date and method of destruction. See Attachment B.

The Certificate of Destruction will also identify the individual who was responsible for the Record's destruction. -The Certificate itself shall not contain confidential information. -Two (2) copies of the Certificate of Destruction will be retained permanently: one in the Responsible Office and one stored electronically by the Office of Information Technology. The Responsible Office's ~~-Certificates~~ of Destruction ~~-records~~ may be retained in paper, digital, or other format.

### **Suspension of the Records Retention Schedule; and** ~~Litigation Hold Directives~~

When litigation involving the College or its affiliates/employees is filed or threatened, the law imposes a duty upon the College to preserve all Records that pertain to the issues involved. -Once aware that litigation exists or is likely to be commenced, the College's General Counsel will issue a litigation hold directive to appropriate personnel. -The litigation hold directive overrides the Records Retention Schedule. Records that may have otherwise been identified for called for the destruction by the Records Retention Schedule should not be destroyed of the relevant Records until the litigation hold directive has been lifted by the General Counsel. -The suspension applies equally to Paper and Electronic Records, including Duplicate Records. -No College employee who has been notified by the General Counsel of a litigation hold directive may alter or destroy a Record that falls within the scope of that litigation hold directive.

Any College employee who becomes aware of litigation or threatened litigation prior to receiving a litigation hold directive shall inform the General Counsel immediately and shall suspend the Records Retention Schedule until either (a) a litigation hold directive, defining

the scope of the suspension, is issued by the General Counsel; or (b) the employee receives confirmation from the General Counsel that no litigation hold directive will be issued.

~~Depending on the Records involved, the College's records storage area may be located off site, in the "Vault," or another location on campus. Supervision of the College's records storage area lies with the Vice President for Planning and Finance.~~

### **Related Policy**

[Personal Information Privacy and Protection Policy \(Policy #320\) \(hyperlink\)](#)

[Right to Know Act \(Policy #311\) \(hyperlink\)](#)

# RECORDS MANAGEMENT RETENTION POLICY - ATTACHMENT A

Explanatory note: This Redline includes only those documents/records that have substantive revisions, or are additions or deletions from the current schedule. It does not include records for which only the office name has been changed or updated. The numbering reflects the prior numbering scheme, not the numbering scheme in the revised and updated schedule. The purpose of this redline is to show substantive changes which are difficult to identify in the primary redline document due to the substantial reorganization and changes made to the schedule.

The “Format” column in the prior Attachment A was removed because the documents listed below may be retained in paper or electronic formats consistent with the Policy unless a specific format is legally required. Documents of historical value as described in the policy shall be maintained in paper/hard copy format, or the original format of the historic document.

Nature of Record	Responsible Office	Required Retention
<a href="#">x.x. Conflict of Interest Disclosures and Reviews</a>	<a href="#">General Counsel</a>	<a href="#">10 years</a>
<a href="#">x.x. Whistleblower Reports and Reviews</a>	<a href="#">General Counsel</a>	<a href="#">10 years</a>
3.6. Right to Know Law Documents ( <a href="#">including requests</a> )	General Counsel	Three years from date of response; If appeal is pending, records must be maintained through disposition of appeal (See 65 P.S. § 67.502)

4.5. Employee <u>and Faculty</u> Handbooks	Human Resources	Permanent
4.6. Employee Relations Complaint Files ( <u>aka non-union Faculty and Employee Grievances</u> ) (not resulting in litigation; excluding discrimination and harassment)	Human Resources	<u>Six years from last date of employment</u> <del>Three years from notification of resolution of complaint</del>
4.8. FMLA <u>and Other Leave</u> Records	Human Resources	Six years (Note that regulations identify documents that must be maintained for the retention period. See, e.g., 29 C.F.R. § 825.500)
<u>x.x. Clearances and Background Checks (e.g. child abuse clearances)</u>	<u>Human Resources</u>	<u>Six years from last date of employment</u>
4.17. Spreadsheets for Paying for Advising	Human Resources	<del>Six</del> <u>even</u> years (See 29 C.F.R. §§ 516.5 and 516.6)
<u>x.x. Worker's Compensation Records</u>	<u>Human Resources</u>	<u>Ten years</u>
<u>x.x Breach Notification Records</u>	<u>Information Technology</u>	<u>Seven years</u>

<u>x.x. Research Misconduct Records</u>	<u>Provost/VP of Academic and Student Success</u>	<u>Seven years</u>
6.1. ABLERecords	<del>Dean, Adult and Community Education</del> <u>VP, Adult and Community Education</u>	See program-specific requirements; in the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and <u>Family</u> Literacy Education, Adult Education and Family Literacy <u>Application</u> Guidelines (Program Year 20 <u>22</u> 09-20 <u>23</u> 40), § <u>46</u> 162))
<u>x.x. Affiliation Agreements</u>	<del>V.P. Academic Affairs</del> <u>Provost/VP Academic and Student Success</u>	<u>Seven years from expiration</u>
6.14. Department and Division Manuals (including <u>Degree Requirements</u> )	Department Heads	Permanent
6.17. Enrollment Statistics and <u>Class Rosters / Lists</u> (Course Level)	Department Heads	Permanent

6.18. ESL Records (Non-Credit)	<del>Dean, Adult and Community Education</del> <u>AVP, Adult and Community Education</u>	See program-specific requirements; In the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and <u>Family</u> Literacy Education, Adult Education and Family Literacy <u>Application</u> Guidelines (Program Year 20 <u>22</u> 09-20 <u>23</u> 10), § <u>46</u> 126)
6.19. GED Records	<del>Dean, Adult and Community Education</del> <u>AVP, Adult and Community Education</u>	See program-specific requirements; In the absence of a program- specific requirement, six years from the submission of the Final Expenditure Report or until all audits are complete and findings resolved, whichever is later (See PDE Bureau of Adult Basic and <u>Family</u> Literacy Education, Adult Education and Family Literacy <u>Application</u> Guidelines (Program Year 20 <u>22</u> 09-20 <u>23</u> 10), § <u>64</u> 126)
6.20. Leadership Institute/ <u>Aspiring Leadership Fellowship</u> Records	<del>V.P. Academic Affairs</del> <u>Provost/VP Academic and Student Success</u>	Review annually

<u>x.x. Course-related Faculty Materials (e.g. examinations / tests, term papers)</u>	<u>Department Heads</u>	<u>One year from end of course, unless the subject of a student grievance/complaint, appeal, or similar, in which case maintain for retention period associated with that secondary process</u>
<u>x.x. Tenure and promotion dossiers</u>	<u>Provost/VP Academic and Student Success</u>	<u>Ten years after separation of the faculty member</u>
6.27. Teaching Evaluations (by Students)	Department Heads	Five years for <del>all tenured and adjunct</del> instructors; If tenure review pending or not yet commenced, maintain until tenure review process is complete. <u>If evaluations are submitted to an employment file and/or tenure dossier, they become a part of those records and will be retained for the period designated for those records.</u>
<u>x.x. Student ADA Accommodation Files</u>	<u>Center on Disability</u>	<u>Five years from graduation or last date of attendance</u>
7.14. Change of Information Forms <u>(including changes to identification numbers)</u>	Director, Student Records and Registration	Five years after graduation or last date of attendance



7.15. Clubs and Organizations – Faculty Advisor Agreements	<del>Director of Student Life</del> <u>Director of Student Engagement</u>	Three years
7.16. Clubs and Organizations - Registrations	<del>Director of Student Life</del> <u>Director of Student Engagement</u>	Three years
7.17. Coaching Agreements	Director of Athletics	Seven years from expiration of contract
7.18. Committee Files	Committee Chair	Permanent for minutes; Five years for other file materials
7.19. Counseling Files and Records	Department Head, Counseling	Seven years from date of last visit, <u>unless the patient was a minor, in which case retain until patient reaches age of majority plus seven years (25)</u>
7.28. FERPA – Disclosure Requests	Director, Student Records and Registration	<del>To be kept for the life of the student record file (34 C.F.R. § 99.32)</del> <u>Permanent</u>
7.29. FERPA – Disclosures	Director, Student Records and Registration	<del>To be kept for the life of the student record file (34 C.F.R. § 99.32)</del> <u>Permanent</u>

7.30. FERPA – Student’s Consent for Records Disclosure	Director, Student Records and Registration	<del>Five years from date of consent termination</del> <u>Permanent</u>
7.31. FERPA – Student Requests for Nondisclosure of Directory Information	Director, Student Records and Registration	<del>Until request withdrawn by student; if request is not withdrawn, then permanent</del> <u>Permanent</u>
7.33. Foreign Student Records (F-1 visas)	Director of Admissions	<del>One year following notification to INS that student is not pursuing full course of study or t</del> <u>Three years after student’s last date of attendance, whichever is later (8 C.F.R. § 214.3(g))</u>
<del>7.36. Graduation Records (Individual Student)</del>	<del>Director, Student Records and Registration</del>	<del>Five years from graduation or last date of attendance</del>
7.45. Student Death Certificates	Director, Student Records and Registration	<del>Ten years</del> <u>Permanent.</u>
7.50. Transcript Request Forms	Director, Student Records and Registration	One year <u>after graduation or last date of attendance</u>
7.54. <u>Releases and Waivers (e.g. Weight Room Release Forms, Activity/Trip Releases and Waivers, etc.)</u>	<u>Department Head</u> <del>Director</del> <u>of Athletics</u>	<del>Three years</del> <u>Seven years from the date of the subject activity or, if the waiver or release pertains to a minor, when the minor turns 25</u>

8.4. <del>College Catalogs (Proposed Changes)</del>	Marketing and Government Relations	Review annually
8.7. <del>E-Alerts</del> <u>CNews</u>	Marketing and Government Relations <u>Communications</u>	Permanent
8.8. <del>E Newsletters</del>	Marketing and Government Relations	Permanent
8.19. <u>Event</u> Photos and Video Footage	<u>Special Events and Community Relations</u> <del>Marketing and Government Relations</del>	Permanent
8.20. Photo Release Forms <u>(Marketing Purposes)</u>	Marketing and <del>Government Relations</del> <u>Creative Services</u>	Permanent
8.22. <del>Press Clippings (regarding CCP)</del>	Marketing and Government Relations	Permanent
8.25. Trademark	Marketing and Government Relations <u>Brand Management and Operations</u>	Permanent

<u>x.x. Environmental Health and Safety Records (asbestos, chemical or blood borne pathogen exposure)</u>	<u>Director, Facilities and Construction Management</u>	<u>Thirty Years</u>
<u>x.x. Safety Equipment Testing Records (fire extinguishers, eye wash stations, fume hoods, etc.)</u>	<u>Director, Facilities and Construction Management</u>	<u>Three Years</u>
<u>Health and Safety Equipment Testing (AEDs, etc.)</u>	<u>Public Safety</u>	<u>Three Years</u>
<u>x.x. <del>R</del>reports made to ChildLine regarding known or suspected child abuse</u>	<u>Public Safety</u>	<u>Until the subject reaches the age of majority plus seven years (25)</u>
9.33. Digital Cameras	<del>Director, Facilities Operations</del> <u>Public Safety</u>	Overwritten every <del>five</del> <u>thirty</u> days
<del>9.40. External Committee Records (e.g. Neighborhood Association, Spring Garden Safety Committee, Police Department)</del>	<del>Originating Office</del>	<del>Permanent for minutes; All other documents review annually</del>

9.46. Incident Reports –	<del>Director, Facilities</del> <u>Public Safety</u>	<del>Five years from graduation</del> <u>Seven years or, if the subject is a minor, until they reach the age of majority plus seven years (25)</u>
9.48. Insurance – Closed Claims (no litigation)	Director, Budget and Financial Services	<del>Seven</del> <u>Three</u> years or until claimant turns <del>25</del> <u>4</u> years of age, whichever is later
9.49. Insurance Policies ( <u>including proof of payment of premiums</u> )	Director, Budget/ Financial Services	<del>Permanent</del> <u>Ten years after expiration</u>
<u>x.x. Settlements (records of and proof of payment)</u>	<u>Budget Office</u>	<u>Permanent</u>
<u>x.x. P-Card Transaction Receipts/Images</u>	<u>Controller</u>	<u>Seven years from the date of transaction</u>
9.64. Purchasing – Advertising	<del>Director, Budget and Financial Services</del> <u>Purchasing</u>	<del>Seven</del> <u>ix</u> years
10.2. Consent Agreements with <u>U.S. Department of Education</u> <del>USDE</del>	<del>Diversity and Equity</del> <u>Equal Education and Employment Office</u>	Permanent

10.3. Discrimination Complaint Files <u>(plus logs)</u> (External) <u>(non-Title IX)</u>	<u>Diversity and Equity</u> <del>Equal Education and Employment Office</del>	<u>Files: Seven years from resolution for; Logs: Permanent</u> <del>Seven Three years from resolution; (Permanent)</del>
10.4. Discrimination Complaint Files <u>(plus logs)</u> (Internal) <u>(non-Title IX)</u>	<u>Diversity and Equity</u> <del>Equal Education and Employment Office</del>	<u>Files: Seven years from resolution for; Logs: Permanent</u> <del>Seven Three years from resolution; (Permanent)</del>
10.5. <del>Mandatory</del> Sexual Harassment Training <u>(Online and In-Person)</u> <u>(Includes sign in sheets, attendance lists, completion lists, evaluation materials, and training materials, including all materials used to train Title IX Coordinators, investigators, decision-makers, and individuals who facilitate informal resolutions)</u>	<u>Diversity and Equity</u> <del>Equal Education and Employment Office</del>	<u>Seven years</u> <del>Sign-in Sheets—Until electronic attendance list created</del> <u>Evaluation Materials—One year</u> <u>Attendance List—Four years</u> <u>Training Materials—Review annually</u>
10.6. <u>Other Civil Rights</u> <del>Non-Mandatory</del> Training <u>(Online and In-Person)</u> <u>(Includes sign-in sheets, attendance lists, completion lists, training materials, and evaluation materials)</u> (e.g. Diversity, Civility)	<u>Diversity and Equity</u> <del>Equal Education and Employment Office</del>	<u>Seven years</u> <del>Review annually</del>

<p><u>x.x. Sexual Harassment Complaint Files (Title IX and Other) (External and Internal) (Includes reports, complaints, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment, such as supportive measures provided (or, if not provided, why this was not clearly unreasonable); sexual harassment investigation records (including determinations regarding responsibility, audio or audiovisual recordings or transcripts, disciplinary sanctions imposed, and remedies provided); appeals and appeals decisions; and informal resolutions.</u></p>	<p><u>Diversity and Equity Equal Education and Employment Office?</u></p>	<p><u>Seven years unless subject is a minor in which case seven years after reaches age of majority (25)</u></p>
<p>10.7. Vets <del>4212400</del> Report</p>	<p><u>Diversity and Equity Equal Education and Employment Office</u></p>	<p>Five years (See 41 C.F.R. § <del>610-300250.80</del>)</p>

## **ATTACHMENT E**

Policy on College Policies Approval  
(Policy #319)



## **Community College of Philadelphia Policy on College Policies**

### **General Administration - Policy No. 319**

**Approved: March 3, 2022**

**Revised: \_\_\_\_\_, 2025**

**Approved by: Board of Trustees**

**Policy Owner(s): General Counsel**

### **Purpose and Scope**

The purpose of this Policy is to set forth the appropriate process for development, review, approval and publication of College policies. By establishing a uniform process applicable to all College policies, this Policy is intended to protect the integrity of the way in which College business is conducted and identify the appropriate administrators responsible for oversight of each College policy.

All College policies must conform with this Policy. A College policy is defined as an official written College directive that supports the College's mission; applies broadly throughout the College; and sets forth clear expectations and guidelines for how College business is conducted.

This Policy does not apply to:

- College Procedures - procedures which a division or department may follow in order to implement a College policy are not policies. Procedures that only apply to an individual department or division rather than to the entire College are also not policies; and
- the Collective Bargaining Agreements between the College and the Faculty and Staff Federation.

### **Authority to Approve a College Policy**

All College policies must be approved by the Board of Trustees ("Board") or, as delegated by the Board, by the President of the College. All policies that address the authority of the College's Board of Trustees, rules or regulations applicable to the Board of Trustees, and/or significant financial policies must be approved by the Board of Trustees. The President shall have the authority to enact changes to Board-approved policies or create any new policy that requires Board approval on an interim basis if there is a legally required change or other urgent circumstance. The Board shall be notified of the interim policy at the next appropriate Board meeting. The Executive Committee should meet for timely review of the interim policy. Board action on approval of the policy must occur no later than one year from the date that the interim policy was enacted. The Board delegates to the President the authority to approve and implement all other policies and policy changes that do not require Board approval.

### **Process for Policy Creation, Review, Revision, or Discontinuance**

Recommendations for changes to policies or new policies may be initiated through the College Standing Committees, the Board's Standing Committees, or any member of the President's Cabinet.

- Policy recommendations from the College Standing Committees shall follow the process outlined in the Full-Time Faculty Collective Bargaining Agreement and shall be forwarded from the applicable standing committee to the Institution Wide Committee ("IWC") to the President for approval. If the President does not follow the recommendations of the IWC, such

recommendation may be presented in writing to the Board and argued before the appropriate Committee of the Board by the IWC's representative(s). The decision of the Board shall be final.

- Policy recommendations from the Board Standing Committees shall be submitted for approval to the Board.
- Policy recommendations from any Cabinet member(s) shall be submitted to the President for approval unless they require Board approval in which case they shall be presented to the appropriate Committee of the Board and then the Board for approval.
- The discontinuance of any policy must be approved by the Board.

### **Identification of Policy Owner**

Before being approved, the applicable Vice President or Cabinet member will assign a senior administrator who will serve as the Policy Owner for the policy. The Policy Owner shall be responsible for ensuring the policy complies with this Policy #319.

### **Review Period**

All policies shall be reviewed on a regular basis to ensure they remain relevant, legally compliant, and follow best practices. The Policy Owner shall be responsible for ensuring the policy remains compliant with current regulations, best practices, and otherwise relevant, and for ensuring the policy is reviewed in accordance with this Policy. All policies shall be reviewed and either: (1) reissued; (2) revised; or (3) discontinued no later than once every ten (10) years. If revisions are made to a policy, the date of any approved revisions must be reflected in the policy on the College's Policy website. The Office of the President/General Counsel shall work with the Policy Owner to determine the appropriate channel for review of the policy. The Policy Owner should consult with any other relevant departments or divisions in reviewing or revising the policy. All policies that involve compliance with laws or regulations or that otherwise may have significant legal implications shall be reviewed by the Office of General Counsel. Once per year, College administration shall report to the Board on all policy updates that occurred during the prior year. The College's Internal Auditor shall be responsible for ensuring Policy Owners comply and meet the deadlines established for the review process.

### **Policy Format**

Upon adoption or review of any policies on or after the effective date of this Policy, the Policy Owner should ensure that the policy as published on the Policy website includes, at minimum, the effective date, revised date(s), Policy Owner, and whether the policy was approved by the Board or the President.

### **Location of Policies**

Upon approval, College policies shall be published on [the College's Policy Website](#). To the extent policies must appear in other official College documents, whenever possible, they should be included in the document as a link to that particular policy from the College's Policy website to ensure the most up-to-date version of the policy appears in those official documents. Additional policies not listed on the Policy Website may be included in the Employee Handbook and/or the Student Handbook.

### **Timeline for Application of this Policy**

All new policies created or updated after March 3, 2022 must comply with this Policy. All existing College policies shall be updated to comply with this Policy on or before August 1, 2028.

**Authority to Update This Policy**

This policy may only be revised by the College's Board of Trustees.

## **Community College of Philadelphia Policy on College Policies**

### **General Administration - Policy No. 319**

**Approved: March 3, 2022**

**Revised: \_\_\_\_\_, 2025**

**Approved by: Board of Trustees**

**Policy Owner(s): General Counsel**

### **Purpose and Scope**

The purpose of this Policy is to set forth the appropriate process for development, review, approval and publication of College policies. By establishing a uniform process applicable to all College policies, this Policy is intended to protect the integrity of the way in which College business is conducted and identify the appropriate administrators responsible for oversight of each College policy.

All College policies must conform with this Policy. A College policy is defined as an official written College directive that supports the College's mission; applies broadly throughout the College; and sets forth clear expectations and guidelines for how College business is conducted.

This Policy does not apply to:

- College Procedures - procedures which a division or department may follow in order to implement a College policy are not policies. Procedures that only apply to an individual department or division rather than to the entire College are also not policies; and
- the Collective Bargaining Agreements between the College and the Faculty and Staff Federation.

### **Authority to Approve a College Policy**

All College policies must be approved by the Board of Trustees ("Board") or, as delegated by the Board, by the President of the College. All policies that address the authority of the College's Board of Trustees, rules or regulations applicable to the Board of Trustees, and/or significant financial policies must be approved by the Board of Trustees. The President shall have the authority to enact changes to Board-approved policies or create any new policy that requires Board approval on an interim basis if there is a legally required change or other urgent circumstance. The Board shall be notified of the interim policy at the next appropriate Board meeting. The Executive Committee should meet for timely review of the interim policy. Board action on approval of the policy must occur no later than one year from the date that the interim policy was enacted. The Board delegates to the President the authority to approve and implement all other policies and policy changes that do not require Board approval.

### **Process for Policy Creation, Review, Revision, or Discontinuance**

Recommendations for changes to policies or new policies may be initiated through the College Standing Committees, the Board's Standing Committees, or any member of the President's Cabinet.

- Policy recommendations from the College Standing Committees shall follow the process outlined in the Full-Time Faculty Collective Bargaining Agreement and shall be forwarded from the applicable standing committee to the Institution Wide Committee ("IWC") to the President for approval. If the President does not follow the recommendations of the IWC, such

recommendation may be presented in writing to the Board and argued before the appropriate Committee of the Board by the IWC's representative(s). The decision of the Board shall be final.

- Policy recommendations from the Board Standing Committees shall be submitted for approval to the Board.
- Policy recommendations from any Cabinet member(s) shall be submitted to the President for approval unless they require Board approval in which case they shall be presented to the appropriate Committee of the Board and then the Board for approval.
- The discontinuance of any policy must be approved by the Board.

### **Identification of Policy Owner**

Before being approved, the applicable Vice President or Cabinet member will assign a senior administrator who will serve as the Policy Owner for the policy. The Policy Owner shall be responsible for ensuring the policy complies with this Policy #319.

### **Review Period**

All policies shall be reviewed on a regular basis to ensure they remain relevant, legally compliant, and follow best practices. The Policy Owner shall be responsible for ensuring the policy remains compliant with current regulations, best practices, and otherwise relevant, and for ensuring the policy is reviewed in accordance with this Policy. All policies shall be reviewed and either: (1) reissued; (2) revised; or (3) discontinued no later than once every ~~seven-ten~~ (107) years. If revisions are made to a policy, the date of any approved revisions must be reflected in the policy on the College's Policy website. The Office of the President/General Counsel shall work with the Policy Owner to determine the appropriate channel for review of the policy. The Policy Owner should consult with any other relevant departments or divisions in reviewing or revising the policy. All policies that involve compliance with laws or regulations or that otherwise may have significant legal implications shall be reviewed by the Office of General Counsel. Once per year, College administration shall report to the Board on all policy updates that occurred during the prior year. The College's Internal Auditor shall be responsible for ensuring Policy Owners comply and meet the deadlines established for the review process.

### **Policy Format**

Upon adoption or review of any policies on or after the effective date of this Policy, the Policy Owner should ensure that the policy as published on the Policy website includes, at minimum, the effective date, revised date(s), Policy Owner, and whether the policy was approved by the Board or the President.

### **Location of Policies**

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### **Timeline for Application of this Policy**

All new policies created or updated after March 3, 2022 must comply with this Policy. All existing College policies shall be updated to comply with this Policy on or before ~~March 3, 2027~~ August 1, 2028.

**Authority to Update This Policy**

This policy may only be revised by the College's Board of Trustees.