

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

**Present for the Business Affairs Committee:** Mr. Timothy Ford, Acting Chair (presiding), Mr. Harold Epps, Ms. Keola Harrington (via zoom), Mr. Rob Dubow (via zoom), and Mr. Jeremiah White (via zoom), Mr. Michael Cooper (via zoom)

**Present for the Executive Committee:** Mr. Harold Epps, Chair (presiding), Mr. Jeremiah White (via zoom)

**Present for the Administration:** Dr. Alycia Marshall, Mr. Jacob Eapen, Mr. Derrick Sawyer, Dr. Mellissia Zanjani, Dr. Shannon Rooney, Mr. Gim Lim, Mr. John Wiggins, Ms. Josephine DiGregorio (via zoom), Mr. Tim Traszka, Dr. Linda Powell, Mr. Gim Lim, Ms. Carolyn Flynn, Mr. Seth Jacobson

**Guest:** Dr. Judith Gay, Vice President Emerita (via zoom)

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

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

Mr. Ford called the meeting to order at 9:06 am. Mr. Ford highlighted the agenda items, and asked Mr. Eapen to proceed with the first agenda item.

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

Discussion: Mr. Eapen stated that 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.

Mr. Wiggins stated that the electrical service upgrade for WRC to accommodate the relocated welding program which were developed/identified after initial contract. This change order includes all labor, equipment and PECO charges for the additional 800amp service addition, which was the reason for the additional cost.

Mr. Wiggins stated that we have a shut-down with PECO involved because there is a PECO transformer inside the West Building. PECO also has to be involved because the work will be done off hours and on the weekend which adds to the additional cost. Mr. Ford commented that regarding weekends and off hours, we wanted to make sure that the Naval Welding program is up and ready to start by October 20, 2025, and that there are no delays or will impact start times for the program. Mr. Wiggins stated that they do not anticipate any delays, and we scheduled PECO and having the contractors moving forward and we seem to be on schedule. Mr. Ford expressed gratitude to Senator Hughes for helping with the grant for capital projects at CATC.

Mr. Eapen stated that the grant is \$150,000 and the change order amount is \$110,000, which leaves approximately \$140,000 to adjust the change order and adjust the contract amount as approved by the Trustees. Mr. Eapen stated that when we did the initial approval, he said that we would use capital and grants. We could not identify the grants until we got this \$250,000. Mr. Dubow asked if there is a threshold to the change order so we can go back out again - that this percentage is a big change. Mr. Eapen responded that the policy states that we have to come back to Business Affairs for any change orders over \$100,000. Mr. Eapen stated that we did not know the power needs were both CATC and WRC when we started this project. As the project continued and we were working with outside consultant, as John stated, the power needs are substantially greater than what was initially in the buildings. Mr. Eapen stated the building was not initially built for the Naval Welding project at CATC. Mr. Dubow commented on our selection process, and asked since this may be a bigger project, should we do a different bid process? Mr. Eapen stated that we will look into it. This change order in the amount of \$110,900 will be added to the original contract sum of \$281,600.

Staff requests that the Business Affairs Committee recommend to the full Board the approval of 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.

Action: Mr. White motioned, and Ms. Harrington seconded the motion to recommend to the Executive Committee 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. The motion passed unanimously.

Mr. Epps stated that for the future that the Facilities team to consider getting dollars from the state through traditional methods are challenging. Mr. Epps encouraged staff to be mindful of any capital or one-offs in particular at CATC where we have friends in both the house and the senate to navigate other methods of funding.

Mr. Epps suggested that whenever something comes up regarding CATC, is something to think about. Mr. Epps stated if we can package it in a way to make a case to repeat this process. Mr. Ford acknowledged that we do have friends we should be asking for opportunities to fill gaps in state budgeting.

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

Discussion: Mr. Ford stated that there was a list of the Proposed Business Affairs Committee Meetings for FY 2026-2027 (See Attachment B).

**(3) The next Business Affairs Committee of the Board of Trustees will be Wednesday, October 15, 2025 (Information Item)**

Mr. Ford noted that the next Business Affairs Committee of the Board of Trustees will be Wednesday, October 15, 2025.

The Business Affairs Committee meeting adjourned at 9:14 am.

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

Mr. Epps opened the Executive Committee at 9:15 am.

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

Discussion: Ms. Flynn stated that General Counsel's office is proposing revisions to the Official Public and Special Holidays Policy (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. Ms. Flynn stated that clean and redlined (to indicate proposed revisions) versions of the revised Official Public and Special Holidays Policy (Policy #304) are attached as Attachment C.

Ms. Flynn stated that the prior policy provides holidays from years 2012 through 2019 but had not been updated after 2019. Based upon the new collective bargaining agreements, the holidays that were identified in the past and proposed policy have not changed and will apply from year to year. The holidays are:

- July 4<sup>th</sup>
- Labor Day
- Thanksgiving (Per CBA, Thursday and Friday)
- Holiday Break (Identified as December 25<sup>th</sup> – January 1)
- Dr. Martin Luther King Day
- Spring Break (First or Second week of March)
- Memorial Day
- Juneteenth

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

Action: Mr. White motioned and Mr. Epps seconded the motion to recommend for approval the new policy to the Board of Trustees. The motion passed unanimously.

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

Discussion: Ms. Flynn stated that the General Counsel's Office 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.

Ms. Flynn presented a Review of Key Updates to the Policy. Ms. Flynn stated that the additions to the policy are as follows: (See Attachment F – PowerPoint)

Additional Requirements and Greater Accountability

Ms. Flynn stated that they consulted with outside counsel, specifically the higher education division at Saul Ewing, to ensure we were evaluating this policy for compliance and best practices because it was last updated in 2010. Ms. Flynn stated that this policy covers many statutory requirements, but also best practices and guidelines. Ms. Flynn stated they added new additional requirements trying to create greater accountability for the College as it relates to our records retention. Ms. Flynn stated the updated standards for maintaining records (i.e., Formats), and reorganization of retention schedule were also updated.

Ms. Flynn noted that Mr. David Solomon, Associate General Counsel, was the lead on this policy review, and stated she appreciates all the work he did. Ms. Flynn stated that the attachment to the policy, was a large reorganization based upon David Solomon's review of not just of the applicable statutes, but also the reorganization based upon changes to the College's structure to make sure it's up to date. Mr. Solomon will be taking the lead to ensure training which we provided and presented to Extended Cabinet on 09/17/2025 to make sure that they were aware that changes are coming. Ms. Flynn stated that the policy applies to all College employees (faculty, staff, non-employees) to make sure that they understand their responsibilities as it relates to retaining documents. Failure to comply with is policy may result in disciplinary action up to and including termination and legal action.

Ms. Flynn stated that some of these requirements are statutory, so we want to make sure that employees are aware of the seriousness and importance of compliance with this policy. Also, Ms. Flynn stated that any suspected noncompliance to this policy should be either referred to General Counsel or can be reported through the College's *Ethics Point* hotline.

#### Updated Standards for Maintaining Records (i.e., Formats)

Ms. Flynn stated that College records will be retained for as long as required by law and the College's Records and Retention Schedule (Attachment A), which incorporates any legal requirements.

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 College's destruction procedures.

Records with potential historical value to the College, for which the Required Retention Period has expired, will be determined by General Counsel with approval of the President. Mr. Epps asked about the range of the retention periods. Ms. Flynn responded that it is at least three (3) years. Mr. Epps asked if that was in perpetuity, and Ms. Flynn responded yes. Ms. Flynn stated that there are also documents that we have determined that should be retained permanently. Under the schedule, Ms. Flynn stated General Counsel will perform an appraisal to ensure that records deemed to have enduring historical, administrative, legal, or fiscal value are preserved.

Ms. Flynn stated that the College is creating a Records Management Coordinator role within each department. Ms. Flynn stated that in the attachment, the categories are broken down – for example, VP Eapen's departments of Human Resources and Purchasing; there are different records requirements related to those, and they are broken down by the department. Everything is grouped to have a better understanding as to what records in each department should be retained. Ms. Flynn stated that we maintain practices and procedures to ensure that offices are meeting the records retention responsibilities by coordinating retention, preservation, and destruction of records in accordance with the policy, but to also look at securing storage of physical and electronic records in accordance with a related policy, their personal information privacy protection policy. Ms. Flynn stated that the policy also addresses an employee's role regarding records with any litigation hold directives.

Ms. Flynn stated that the policy addresses retaining digitized records and the management of emails, because there are circumstances where emails could be considered documents requiring retention. Ms. Flynn stated that what we have been advising is that if email is used in lieu of formal correspondence of letters and as a result could be considered one of the categories for retention. Ms. Flynn stated that it is her understanding that our system automatically holds emails for three years.

Ms. Flynn stated that the policy attachment revision was a heavy lift by Mr. Solomon because he reorganized the chart based on the current college structure which hasn't been updated since 2010, and has had a lot of changes in terms of the college structures since then. Ms. Flynn stated that some changes for some documents were made, whether it's a legal update, department name change, or the title of the document or how it's described. Ms. Flynn described that the format column has been eliminated. Ms. Flynn stated that records may be kept in either paper or electronic format consistent with the policy unless the specific format is legally required, which is provided for in the policy. Historic documents shall be maintained in the paper hardcopy format, or the original format of the historical document. For example, Ms. Flynn stated that originating documents of this College that were signed or sealed should be retained in paper format.

Mr. Epps asked if all this has been through the Policy Working Group. Ms. Flynn responded that it was not, and that it was sent to outside counsel instead for review. Ms. Flynn stated that the Policy Working Group is meeting again on September 26, 2025. Mr. Epps asked if the group will be advised of the changes, and Ms. Flynn responded, yes.

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

Action: Mr. White motioned and Mr. Epps seconded the motion to recommend to the Board of Trustees the revised Records Management and Retention Policy (Policy #313) policy for approval. The motion passed unanimously.

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

Discussion: Ms. Flynn stated General Counsel's Office 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.

Ms. Flynn stated that the College is seeking to provide two revisions related to this policy which was a discussion that occurred along with a recommendation within the Policy Working Group. The two revisions relate to modifying the timeframes related to when policies have to be reviewed. Under the current policy, a policy must be reviewed every seven years, and a recommendation was to make those ten years to make sure there is no question regarding the College's ability to comply.

Ms. Flynn stated that this policy went into effect in 2022. The Policy on College Policies came into effect during Middle States and it is important for Middle States that we have a policy about the routine review of policies. The current policy, has a date set for March 2027 for the College to complete the review of all existing policies. Also, there was a recommendation from the Policy Working Group that we should extend this date, to make sure that we are in compliance with the policy when it comes up during the next Middle States.

Mr. Epps asked, how that stack up against our peers? Ms. Flynn responded that she has not yet evaluated peers' policies because there is no specific policy review timeline requirement that applies to colleges and the timeline can vary from school-to-school. Mr. Epps asked how many policies do we have? Ms. Flynn estimated that we have close to 70 policies. Mr. White asked if Trustee Posoff was okay with this. Ms. Flynn stated yes. Mr. White stated that when this all happened, I recommended that Mindy be Chair of the committee to try and get us in compliance around the Middle States interaction. Mr. White stated to Mr. Epps that his belief is if Mindy, who is very attentive on this, recommended that as a benchmark, if we come up against it in Middle States, that doesn't mean that she is not going to try to do it more quickly. Mr. White stated that he would be inclined to go with her recommendation. Mr. Ford stated that he too was in those meetings with Trustee Posoff and he had the same questions. Mr. Ford stated that as far as Middle States and accreditation goes, we really wanted to show Middle States most importantly that we have a timeframe that we can meet. We would rather change the overall timing than miss a deadline. Mr. Epps added, there is a cushion. Mr. Ford stated that we can plan to work ahead, and those of us who are on the Policy Working group want to work with Carolyn (Flynn) and David (Solomon) who has done an amazing job to stay ahead of it. Mr. White ask Dr. Gay, if she was okay with this? Dr. Gay responded that she is good with it, and it doesn't mean that they won't come up before 10 years. Dr. Gay stated, that in fact, most of them will because of different legal issues or other things that come up. Dr. Gay continued that you will notice that some of them are being updated in two or three years.

Dr. Gay stated that it's not that we are waiting 10 years for all of them. It just provides a timeframe that's more realistic, given the number policies; Dr. Gay stated that she thinks there are more than 70.

Dr. Gay stated that given the number of policies, there is no way to complete it during this timeframe they suggested originally, and as Mr. Ford said, the important thing for Middle States is if you set yourself a rule; you follow it.

Ms. Flynn stated that for example the Title IX policy has been updated on almost an annual basis over the past couple of years because of changes to the applicable regulations.

Also, Ms. Flynn states, that with the transition in General Counsel, the prior year 12 policies were reviewed, and this year doubles that. Ms. Flynn stated that she is very confident that we can get the reviews done well within the August 2028 timeline.

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).

Action: Mr. White motioned and Mr. Epps seconded the motion to recommend to the Board of Trustees to adopt the revised policy. The motion passed unanimously.

Regarding action item #4 on the agenda, Ms. Flynn requested to amend the agenda because we are going to be requesting that the policies that were approved and recommended for approval by the Board of Trustees at today's meeting are included on the agenda for the October meeting, when we present the policy update memo. Ms. Flynn requested to amend the agenda to remove the policies bullets two through four from the item #4 of the agenda.

Action: Mr. White motioned and Mr. Epps seconded the motion to amend the agenda to remove the policies bullets two through four from item #4 of the agenda. The motion passed unanimously.

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

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. Mr. White motioned, and Mr. Epps seconded the motion. The motion passed unanimously.

The Business Affairs Committee meeting was adjourned at 9:20 am.

**EXECUTIVE SESSION**

The Business Affairs Committee went into Executive Session to discuss real estate matters.

|                                                                                             |                          |               |               |
|---------------------------------------------------------------------------------------------|--------------------------|---------------|---------------|
| <b><u>ATTACHMENT A</u></b>                                                                  |                          |               |               |
| <b>FUNDING FOR ACTION ITEMS</b>                                                             |                          |               |               |
| <b>COMBINED MEETING OF THE BUSINESS<br/>AFFAIRS COMMITTEE AND THE<br/>BOARD OF TRUSTEES</b> |                          |               |               |
| <b>AGENDA: September 17, 2025</b>                                                           |                          |               |               |
|                                                                                             |                          |               |               |
| <b>Agenda<br/>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                           |
| 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</u><br><del>Friday, November 25, 2011</del> |

|                               |                                                                                                                                                             |
|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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> <del>Third Monday of January</del>                                                                                      |
| School (Spring) Holidays      | <del>Monday, March 5, through</del> <del>First or Second full week of March</del> <del>Saturday, March 10, 2012</del>                                       |
| Memorial Day                  | <del>Monday, Last Monday of</del> <del>May 28, 2012</del>                                                                                                   |
| <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><br><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<br/>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> |

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| <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> |

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| Thanksgiving Day College Holiday | Thursday, November 28, 2013<br>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<br>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) |

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| Labor Day                        | Monday, September 1, 2014                                                                        | Formatted: Space After: 18 pt, Pattern: Clear (White) |
| Thanksgiving Day College Holiday | Thursday, November 27, 2014<br>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<br>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) |
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| 2015-2016                        | -                                                                                                | Formatted: Space After: 18 pt, Pattern: Clear (White) |

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| Independence Day Holiday         | Monday, July 6, 2015                                                               |
| Labor Day                        | Monday, September 7, 2015                                                          |
| Thanksgiving Day College Holiday | Thursday, November 26, 2015<br>Friday, November 27, 2015                           |
| Holiday Break                    | Thursday, December 24, 2015 College closed at noon through Friday, January 1, 2016 |
| Martin Luther King's Birthday    | Monday, January 18, 2016                                                           |
| School (Spring) Holidays         | Monday, March 7, through<br>Saturday, March 12, 2016                               |
| Memorial Day                     | Monday, May 30, 2016                                                               |

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| 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<br>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<br>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) |

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| <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<br/>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<br/>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> |

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| <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<br/>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<br/>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;<br>Logs: Permanent                                                  |
| 3.16. Discrimination Complaint Files (plus logs) (Internal) (non-Title IX) | Equal Education and Employment Office | Files: Seven years from resolution;<br>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;<br>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) |
|-----|-------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 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 |
|------------------|--------------------|--------------------|
|------------------|--------------------|--------------------|

|                                                               |                                  |                                                |
|---------------------------------------------------------------|----------------------------------|------------------------------------------------|
| 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<br>(excluding contracts)           | Special Events and<br>Community<br>Relations | Review annually                        |
| 6.52 Facilities Contracts for<br>Outsiders to Use CCP | Special Events and<br>Community<br>Relations | Five years from expiration of contract |
| 6.53 Institution<br>Publications                      | Communications                               | Permanent                              |
| 6.54 Legislative Requests<br>and Responses            | Marketing and<br>Government<br>Relations     | Two years                              |
| 6.55 Drafts of Marketing<br>Materials                 | Marketing and<br>Creative Services           | Review annually                        |
| 6.56 Marketing Plans                                  | Marketing and<br>Creative Services           | Permanent                              |
| 6.57 Marketing<br>Publications                        | Marketing and<br>Creative Services           | Permanent                              |
| 6.58 Marketing Research                               | Marketing and<br>Creative Services           | Review annually                        |
| 6.59 Materials to Respond<br>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<br>(e.g. Federal Express,<br>UPS) | Mailroom                  | Three years               |

**Controller**

| <b>Nature of Record</b>                      | <b>Responsible Office</b> | <b>Required Retention</b> |
|----------------------------------------------|---------------------------|---------------------------|
| 7.11 Accounts Payable<br>Records             | Controller                | Current plus seven years  |
| 7.12 Accounts Receivable<br>Records          | Controller                | Current plus seven years  |
| 7.13 Annual Financial<br>Statements          | Controller                | Permanent                 |
| 7.14 Audit Reports                           | Controller                | Permanent                 |
| 7.15 Bank Statements and<br>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<br>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 <a href="#">and Faculty</a> Handbooks                                                                                                                              | Human Resources                        | Permanent                                                                                                                             |
| 4.6. Employee Relations Complaint Files ( <a href="#">aka non-union Faculty and Employee Grievances</a> ) (not resulting in litigation; excluding discrimination and harassment) | Human Resources                        | <a href="#">Six years from last date of employment</a> <del>Three years from notification of resolution of complaint</del>            |
| 4.8. FMLA <a href="#">and Other Leave</a> 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) |
| <a href="#">x.x. Clearances and Background Checks (e.g. child abuse clearances)</a>                                                                                              | <a href="#">Human Resources</a>        | <a href="#">Six years from last date of employment</a>                                                                                |
| 4.17. Spreadsheets for Paying for Advising                                                                                                                                       | Human Resources                        | <del>Six</del> even years (See 29 C.F.R. §§ 516.5 and 516.6)                                                                          |
| <a href="#">x.x. Worker's Compensation Records</a>                                                                                                                               | <a href="#">Human Resources</a>        | <a href="#">Ten years</a>                                                                                                             |
| <a href="#">x.x Breach Notification Records</a>                                                                                                                                  | <a href="#">Information Technology</a> | <a href="#">Seven years</a>                                                                                                           |

|                                                                              |                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>x.x. Research Misconduct Records</u>                                      | <u>Provost/VP of Academic and Student Success</u>                                          | <u>Seven years</u>                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6.1. ABLE Records                                                            | <del>Dean, Adult and Community Education</del><br><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> 19), § <u>46</u> 162)) |
| <u>x.x. Affiliation Agreements</u>                                           | <del>V.P. Academic Affairs</del><br><u>Provost/VP Academic and Student Success</u>         | <u>Seven years from expiration</u>                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6.14. Department and Division Manuals <u>(including Degree Requirements)</u> | Department Heads                                                                           | Permanent                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 6.17. Enrollment Statistics <u>and Class Rosters / Lists</u> (Course Level)  | Department Heads                                                                           | Permanent                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                                                           |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6.18. ESL Records (Non-Credit)                                            | <del>Dean, Adult and Community Education</del><br><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><br><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><br><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><br><u>Director of Student Engagement</u> | Three years                                                                                                                                                  |
| 7.16. Clubs and Organizations - Registrations              | <del>Director of Student Life</del><br><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><br><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><br><u>Permanent</u>                                                        |

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| 7.30. FERPA – Student’s Consent for Records Disclosure                                                       | Director, Student Records and Registration                        | <del>Five years from date of consent termination</del><br><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><br><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><br><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><br><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><br><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>                                                        |

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

|                                                                                      |                                                                                 |                                                                                                                                                       |
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| 9.46. Incident Reports –                                                             | <del>Director, Facilities</del><br><u>Public Safety</u>                         | <del>Five years from graduation</del><br><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>1</u> years of age, whichever is later                                   |
| 9.49. Insurance Policies<br>( <u>including proof of payment of premiums</u> )        | Director, Budget/<br>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><br><u>Purchasing</u>         | <del>Seven</del> <u>ix</u> years                                                                                                                      |
| 10.2. Consent Agreements with <u>U.S. Department of Education</u><br><del>USDE</del> | <del>Diversity and Equity</del><br><u>Equal Education and Employment Office</u> | Permanent                                                                                                                                             |

|                                                                                                                                                                                                                                                                                                                                                          |                                                                              |                                                                                                                                                                                                                 |
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| 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><br><u>Evaluation Materials—One year</u><br><u>Attendance List—Four years</u><br><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. <del>Diversity, Civility</del> )                                                                                                | <u>Diversity and Equity</u> <del>Equal Education and Employment Office</del> | <u>Seven years</u> <del>Review annually</del>                                                                                                                                                                   |

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| <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>4212100</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.

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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.
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### **Review Period**

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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.

## **ATTACHMENT F**

Record Retention Policy  
(PowerPoint)



# Records Management and Retention Policy

Updates – 9.16.2025



# Review of Key Updates to the Policy

- Additional Requirements and Greater Accountability
- Updated Standards for Maintaining Records (i.e., Formats)
- Reorganization of the Retention Schedule



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# Requirements and Accountability

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# Policy Applicability and Responsibility

- 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).



# Policy Requirements

- 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.



# Accountability: 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



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# Maintaining Records

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# Notable Additions/Updates

- Provides for Digitizing Paper Records
- Addresses Management of Emails
- Updates Standards for Safeguarding Against Accidental Disclosure and Protection of Confidential Records and Personal Information



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# Retention Schedule

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# Changes and Updates to Attachment A

- Reorganized Based on Current College Structure
- Some Changes for Some Documents
- Eliminates “Format” Column



# “Records may be kept in either paper or electronic format...”

## 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    |



# Takeaways

- Definitive statements of requirements and standards
- Formalized structures within offices/departments to ensure compliance
- Overhaul and updates to Retention Schedule for our changing times



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**Please direct any questions about the retention or maintenance of specific documents, as well as any other questions about the Policy, to the Office of General Counsel.**

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