



ECKERD COLLEGE

Document Retention Policy

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1.0 Policy Statement

This Policy is designed to outline a process to manage the records created in the course of the College's academic and administrative operations. This Policy covers all records and documents, including electronic documents, contains guidelines for how long certain documents should be kept and how records should be destroyed. The Policy is designed to promote compliance with federal and state laws and regulations, to minimize accidental or innocent destruction of records and to facilitate the College's operations by promoting efficiency and freeing up valuable storage space.

2.0 Purpose

The purpose of this Policy is to provide guidelines to establish a records retention program at Eckerd College. This Policy will be made available on-line for the continued reference of the College community.

The management of records includes appropriate practices for organizing and archiving those records determined to have permanent or enduring value, and proper destruction of those records deemed not to have permanent or enduring value once operational needs have been met and no legal considerations require attention.

The retention periods set forth in the Record Retention Schedule generally do not apply to drafts and work papers. Drafts of Records, documents, work papers, notes, fragmented data, and deleted electronically stored information are temporary in nature and will not be retained beyond active use. Unless instructed otherwise in connection with a Legal Hold, drafts, work papers and notes may be discarded upon completion of the final document, unless they are an integral part or essential backup of an Official Record (in which case, the drafts and work papers shall be retained with the Official Record). ***Drafts and work papers should not be retained longer than the related Official Record.***

Official Records that are not listed in the Record Retention Schedule shall be retained in accordance with the retention period for substantially similar Records. Exact duplicates of Official Records can be destroyed at any time and should not be kept beyond the time period set within the Retention Schedule for the Official Record. ***Informational copies should not be retained longer than the Official Record.***

3.0 Applicability

This Policy applies to all faculty and staff who manage Eckerd College's Records. This Policy also applies to all student employees, independent contractors, and volunteers whose work or services for Eckerd College require the management of the College's Records.

4.0 Definitions

1. Official Records Retention and Disposition Schedules

Official records retention and disposition schedules are the general and departmental program schedules that have been approved by the College and specified in this Policy.

2. File Breaking

File breaking is defined as the breaking or ending of files containing Official Records at regular intervals, at the end of a year or other duration, to permit their destruction, transfer to archives, or transfer to inactive storage areas. Regular breaking of files containing Official Records permits the establishment of new files and records series sequences within existing file space.

For academic departments and academic committees, the end of the academic year is a file breaking point. For administrative departments, supporting units and administrative committees, the end of the fiscal year is a file breaking point. **[IT state its policy on archive digital records here]**

3. Litigation Hold

A "litigation hold" is a suspension of the College's document retention/destruction policies for those documents that may be relevant to a lawsuit that has been actually filed or one that is "reasonably anticipated." See section 10 – Litigation Hold.

4. File Integrity

Complete, original file order, and unbroken custody of Official Records in a filing system should be maintained for Official Records to maintain file integrity.

5. File Maintenance

File maintenance is the application of records management practices to maintain Official Records properly, retrieve them, maintain integrity, and make their regular disposition more practical.

6. Personally Identifiable Information

Personally Identifiable Information is data or information that includes either the name of an individual or other family member, the individual's address, a social security number or identification number, and other information that would make an individual's identity easily traceable.

7. Confidential Information

Confidential Information is defined as information that is protected as confidential by law, such as the Family Educational Rights and Privacy Act of 1974 (education records), or the Health Insurance Portability and Accountability Act's Privacy Regulations (medical records). Confidential Information also includes:

- a. Personnel information,
- b. Purchasing records related to a sealed response to a request for proposal prior to the award of contract,
- c. Proprietary information, and
- d. Information Eckerd College has contractually agreed not to disclose

8. Legal Custodian of Electronic Records

The term "legal custodian of electronic records" shall mean the originator of an e-mail message or the creator of an electronic document if that person is a College employee, consultant, or volunteer. Otherwise, it is the College employee to whom the message is addressed or to whom the electronic document is sent. If the record is transferred, by agreement or policy, to another person for archival purposes, then that person becomes the legal custodian. Records that are scanned are the responsibility of the individual department and shall be retained according to this Policy.

9. Records

Records are information fixed in any media including paper and electronic documents, audio and video recordings, databases, emails and text messages.

a. Unofficial Records

Unofficial Records are not subject to this Policy. Unofficial Records are:

- Private or personal documents that are not created or received in the course of Eckerd College's business;
- Faculty Records created or received in the course of faculty research or professional activities, such as interview or survey results, databases, or manuscript materials.

b. Official Records

Official Records include: correspondence, minutes, memos, drawings, maps, computer data, reports, newsletters, published materials, institutional policies and

procedures, financial records, including invoices, journals, ledgers, purchase orders, grant documentation and other records pertaining to fiscal information. Official Records are classified by subject matter category (General, Legal, Financial, Student, etc.) and by the frequency of access to the Record that is required (Active, Inactive, Archival). Official Records may also be further classified as Essential Records, as defined below.

1. Essential Records

Essential Records are a subset of Official Records. An Essential Record is a Record containing information essential to re-establish or continue the operations of the College in the event of a disaster. Essential Records are necessary to recreate Eckerd College's legal and financial status and determine the rights and obligations of the Board, employees, donors, parents, students, and alumni. Examples include personnel records, leases and contracts, land deed and easement files, patents, engineering drawings of Eckerd College's buildings, construction specification files, student records, accounting records and donor agreements.

2. Official Records Defined by Frequency of Access

a. Active Records

Active Records are Official Records that continue to be used by the creating administrative unit for conducting regular business and are maintained in active office files. Official Records remain Active Records for varying periods of time, depending on the purpose for which they were created.

b. Archival Records

Archival Records are Official Records that include organization charts, correspondence, minutes, architectural drawings, theses, temporary documents, memorabilia, personal papers, etc. Materials collected by the archives include but are not limited to: meeting minutes, reports, correspondence, financial records, program records, documentation of events, images, audio/visual recordings, personnel files, news clippings, course files, topical files (unique to creating office), publications, artifacts, publicity, personal papers, legal documents, architectural drawings, student records, histories, and student papers. Archival Records may be permanently retained even if there is no legal, regulatory, or management retention requirement (for example, historical records such as clippings, programs, and photographs).

c. Historic Archival Records

Historic Archival Records are Official Records that are of permanent or historical value but are no longer required to be retained in the originating or receiving office.

d. Essential Archival Records

Essential Archival Records are Official Records that have continuing administrative, research, or historical value, or which document Eckerd College's organization, functions, policies, decisions, procedures, or operations.

e. Inactive Records

Inactive Records are Official Records that are no longer required by their creating unit or other units to carry on current business and, therefore, are ready for final disposition in accordance with the Eckerd College Records Retention Schedule, as set forth in this policy.

3. Official Records Defined By Subject Matter

All Official Records are also classified by the following subject matter categories:

a. General Records

General Records are Records created in the course of administering, or managing a department, unit, or office at Eckerd College.

b. Education/Student Records

Education/Student Records are Records created when dealing with students, including but not limited to transcripts, disciplinary hearing files, student files or test score reports.

c. Financial Aid Records

Financial Aid Records are Records created during the administration of Title IV financial aid funding or any other financial aid programs, grants or scholarships. This includes all Records that must be maintained in accordance with the Federal Student Aid Handbook.

d. Personnel Records

Personnel Records are Human Resources and related Records created for employees and volunteers, including but not limited to personnel files, payroll records, employee medical records, and workers' compensation files.

e. Publicity/Marketing Records

Publicity/Marketing Records pertain to dealings with the public, the media or while conducting outreach activities, including but not limited to handouts, publications, maps, catalogs, or brochures.

f. Accounting/Financial Records

Accounting/Financial Records pertain to the development and administration of Eckerd College's budget and financial transactions, including but not limited to invoices, checks, insurance policies, audit reports, budget reports and grant agreements.

g. Regulatory/Compliance Records

Regulatory/Compliance Records pertain to compliance with applicable regulations, not otherwise covered in the categories set forth in this Policy. For example, this includes but is not limited to the Occupational Safety and Health Administration ("OSHA"), hazardous waste disposal records and the Fair & Accurate Credit Reporting Act ("FACTA"). This does not include Records pertaining to compliance with workers' compensation, which would be covered by Personnel Records.

h. Campus Safety Records

Campus Safety Records pertain to Campus Safety, institutional crime, Cleary Act reporting, safety on campus, Safety Committee Records and any other Records pertaining to law enforcement or safety at Eckerd College.

i. Legal Records

Legal Records are created by an attorney for Eckerd College or by Eckerd College for the purpose of seeking legal advice on behalf of Eckerd College.

j. Library Records

Library Records are created during the administration of the Library including patron information, circulation records, and Inter-Library Loan records. This definition does not apply to the holdings of the Library, whose retention and destruction is governed by the Collection Maintenance Policy which is available at the Library.

k. Institutional Research Records

Institutional Research Records pertain to Eckerd College’s student composition, ranking, statistics, including surveys, US News & World Report rankings, and Integrated Postsecondary Education Data System surveys and reports.

l. Electronic Records

Electronic Records include, but are not limited to:

- Electronic communications
- Word processing documents and spreadsheets
- Databases
- Scanned documents

10. Record Retention Schedule

A Record Retention Schedule describes Records by subject matter category, provides a timetable for the maintenance, archiving, and destruction of the Records, provides an ultimate disposition for the Records, and serves as authorization for the disposition of Records.

11. Record Retention Period

A Record Retention Period is the length of time that a Record must be kept by law, or institutional Policy. The Record Retention Period for each Official Record is given in Eckerd College’s Records Retention Schedule. The Record Retention Period may be designated as “permanent,” “until superseded,” “until obsolete (business need ceases),” or for a certain number of years or months.

12. Record Storage

The College has limited space to store records. Therefore, records identified in the retention schedule should be stored at the warehouse (Iron Mountain). Each

department has a designated staff member with access to Iron Mountain's web page (See Appendix B) where requests for storing documents are made by asking for a specific number of cartons. When feasible, departments are encouraged to scan and save documents onto an encrypted electronic medium, and store them in a fireproof filing cabinet or container.

5.0 Electronic Records General Requirements

Maintenance and disposal of electronic records, as determined by the content, are the responsibility of the legal custodian. Electronic Records will be retained as if they were paper documents. Information Technology Services will facilitate the routine and secure destruction of Electronic Records with oversight by the Chief Financial Officer or designee.

1. Electronic Communications

College e-mail addresses are provided to employees for work purposes only. Work-related e-mail is a College record, and must be treated as such. E-mail users must take responsibility for sorting out personal messages from work-related messages and retaining College records as provided in this Policy. E-mail that does not meet the definition of a College record, e.g., personal e-mail or junk e-mail, shall be deleted from the system.

Information Technology Services maintains a back-up schedule.

Legal Custodians may file documents in an encrypted electronic medium and store in a secure location, preferably a fireproof filing cabinet or container. Otherwise, printed copies may be retained according to the retention schedule and stored at the warehouse (Iron Mountain). E-mail messages should be kept with the attachment(s). The printed copy of the e-mail must contain the following header information:

- who sent the message
- to whom the message was sent
- date and time the message was sent
- subject of the message

2. Information Technology Service Backup Files

Information Technology Services performs backups on a regular schedule of the e-mail and electronic files stored on central servers for disaster recovery. These backups are to be used for system restoration purposes only. These backups are kept by the department for a period of 90 days after which time the backups are erased.

3. Litigation Holds (Pertaining to Electronic Records)

When litigation against the College or its employees is filed or imminent, the law imposes a duty upon the College to preserve all documents and records that pertain to the issue in dispute. As soon as College Counsel or the Chief Financial Officer or designee is advised of pending litigation, a hold directive will be issued to the legal custodians. The litigation hold directive overrides any records retention schedule that may have otherwise called for the transfer, disposal, or destruction of the relevant documents, until the hold has been cleared by College Counsel or the Chief Financial Officer. E-mail and computer accounts of separated employees that have been placed on a litigation hold will be maintained by Information Technology Services until the hold is released. No employee who has been notified by College Counsel of a litigation hold may alter or delete an electronic record that falls within the scope of that hold. Violation of the hold may subject the individual to disciplinary action, up to and including termination, as well as applicable personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

6.0 Responsibilities

1. Record Retention Officer

All employees of Eckerd College are responsible for managing and maintaining the records they create in compliance with this policy and the record management program developed by the College.

The Chief Financial Officer (CFO) or designee has ultimate responsibility for the record retention program. Questions concerning compliance with this policy shall be directed to the CFO or designee.

Eckerd College has contracted with an outside vendor for record storage and destruction. A copy of the site page from our vendor may be found at Appendix B.

2. Departments/Committees

All departments and committees of Eckerd College are responsible for properly managing their Official Records and shall have a designated employee who is primarily responsible for compliance with this Policy.

3. Employees/Consultants/Independent Contractors

Employees, consultants, and independent contractors are responsible for being familiar with this Policy and for managing records in their possession, custody, or control in accordance with this Policy. These individuals may request guidance from the Record Retention Officer or designee.

7.0 Record Retention and Storage

1. Format of Storage by Category

Official Records shall be maintained in their original format, unless otherwise specified in this Policy, or directed by the Record Retention Officer or designee.

a. Financial Aid Records

In accordance with federal requirements, as set forth in the Federal Student Aid Handbook, Eckerd College shall keep its Federal Student Aid (“FSA”) records in one of the following formats:

Original signed promissory notes and signed repayment schedules for Perkins Loans, National Direct Student Loans, and National Defense Student Loans must be kept in a locked fireproof container until the loan is repaid or until Eckerd College needs the originals to enforce collection of the loan.

If a loan is assigned to the Department of Education (DOE), Eckerd College must send to the DOE the original promissory note or a certified copy of the note, as well as a copy of the original deferment or cancellation form(s). Eckerd College may not send computer-generated form(s) or microform(s). Eckerd College may keep other required records in hard copy or in microform, computer file, optical disk, CD-ROM, DVD or other media formats, but all record information must be retrievable in a coherent hard copy format or in other media formats acceptable to the DOE except that (1) a student’s Student Aid Reports (“SAR”) or Institutional Student Information Records (“ISIR”) used to determine eligibility for FSA program funds must be kept in the format in which Eckerd College received it, unless Eckerd College keeps the SAR in an imaged media format; and (2) any document that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be kept in its original hard copy or in an imaged media format.

Any imaged media format used to keep required records must be capable of reproducing an accurate, legible, and complete copy of the original document, and, when printed, this copy must be approximately the same size as the original.]

2. Time Period for Storage by Category

Official Records containing mixed Record Retention Periods shall be retained for the longest Record Retention Period set forth in any applicable Record Retention Schedule. The Record Retention Periods are dependent on the particular department/area. Some are based on fiscal years (July 1 to June 30) and are exact retention periods, which means that the department must keep an Official Record as long as stated in the Record Retention Period (minimum). Never destroy a Record

related to an ongoing/current litigation matter, criminal or civil investigation, or audit. A detailed Record Retention Schedule is provided in Appendix A.

a. Education/Student Records

Eckerd College shall keep all Education/Student Records in accordance with the principles set forth by the American Association of Collegiate Registrars and Admissions Officers' Retention of Records: Guide for Retention and Disposal of Student Records. See Appendix A for the Record Retention Schedule applicable to Education/Student Records.

b. Financial Aid Records

Eckerd College shall keep Records relating to the school's administration of a campus-based program for three years after the end of an award year for which the aid was awarded and disbursed under that program.

Eckerd must retain the Fiscal Operations Report and Application to Participate ("FISAP") containing reported expenditures and any Records necessary to support the data contained in the FISAP, including "income grid information," for three years after the end of the award year in which the FISAP is submitted.

Eckerd must keep repayment Records for Perkins Loans, including Records relating to cancellation and deferment requests for at least three years from the date a loan is repaid, cancelled, or assigned to the Department. If a loan is assigned to the Department due to total and permanent disability, the College must retain any loan-related documentation that it does not submit until the Department approves a final discharge or the loan has been paid in full.

Records questioned in an accounting or legal audit must be kept until the questions are resolved or until the end of the Record Retention Period, whichever comes last.

c. General Records

See Appendix A.

d. Personnel Records

e. Accounting/Financial Records

f. Campus Safety

g. Library Records

h. Institutional Research Records

For d through h above, see Appendix A for the applicable Record Retention Schedule.

i. Legal Records

Legal Records shall be maintained for the length of time directed by the attorney involved in the communication.

8.0 Place of Storage

1. Storage Vendor – Inactive Records

The College contracts Iron Mountain to store and secure records according to the retention schedule identified in this policy. Departments may place requests to store cartons or retrieve stored cartons by accessing Iron Mountain’s web site.

Storage areas for Inactive Records awaiting destruction or disposal must be physically secure and environmentally controlled, to protect the records from unauthorized access and damage or loss from temperature fluctuations, fire, water damage, pests, theft, and other hazards. Due to limited storage space on campus, these types of storage areas are currently provided by Iron Mountain.

2. Active and Archival Records Containing Confidential or Personally Identifiable Information

Active Records containing Confidential or Personally Identifiable Information should not be stored on the C: or local hard drive of a desktop or laptop computer, floppy or Zip disk, unencrypted thumb/jump drive, CD-ROM or DVD.

Mini-storage facilities, and off-campus personal or rental property of staff members, including garages, homes, mobile homes, trailers, etc., are not acceptable for storage of Active Records containing Confidential or Personally Identifiable Information.

These records should be stored on the College’s server or an encrypted electronic medium.

2. Historic and Essential Archival Records

Hard copies of Historic and Essential Archival Records should be stored in fireproof containers in a manner accessible on an as-needed basis.
Electronic copies of Essential Historic Archival Records should be stored

in an encrypted medium and file in a fireproof filing cabinet.

9.0 Method of Disposition of Records by Category

In the age of identity theft and data breach reporting requirements, it is important that records are disposed of in a manner that protects the College, its employees and students. Accordingly, a copy of an Official Record shall be destroyed in the same manner as the Official Record from which it originated. Official Records shall be destroyed or retained at the conclusion of the Record Retention Period set forth in this Policy.

1. Destruction of Confidential Records

All paper Records that have been designated confidential or that contain Confidential or Personally Identifiable Information and are subject to destruction shall be shredded. All Records that would pose a security risk or risk of identity theft shall be shredded. In the case of electronic Records, these Records shall be electronically purged in a manner that ensures they are not accessible on Eckerd College's server and that provides for destruction of all Confidential or Personally Identifiable Information. See the ITS Director for further details about proper methods of electronically purging Records.

2. Transfer to Archives

If an Official Record is to be maintained permanently as an Essential or Historic Archival Record, it may be transferred to Archives for storage. The College is currently evaluating the space available and the cost of maintaining the Official Records. Departments may be directed to physically preserve hard copies or digitally archive Official Records.

Historic Archival Records shall be authorized for destruction by the senior officer of each administrative or academic office of origin after considering historic value and consulting with the Record Retention Officer.

10.0 Litigation Holds

1. Legal Hold Notice

In the event that the College determines that litigation or an administrative agency claim is reasonably likely to occur that may result in a legal hold, the College will take appropriate steps to initiate a litigation hold on relevant records so that this information can be preserved. A memorandum providing the details of the case

as shown in Appendix D will be sent by the CFO to the appropriate Director, Dean, and/or Vice President.

Records that are subject to a litigation hold shall not be destroyed in accordance with Eckerd College's standard destruction procedures. As such, upon initiation of a litigation hold, these Records must be immediately segregated from other records so they are protected from any routine Record purges. This is especially critical for emails or other electronic documents that may be subject to a computerized purge cycle. Please consult with the Director of Information Technology Services if you have any questions about this procedure.

2. Interviews with Legal Custodians

Interviews with legal custodians or other personnel may be conducted by Counsel representing the College to determine each individual's knowledge of the situation, including confirming the receipt of the Legal Hold and the existence of potential relevant Documents. If documents are stored at the warehouse (Iron Mountain), staff responsible for the Department's Record Retention shall retrieve these documents promptly. This person shall also identify the drives and folders that contain potentially relevant information, so that ITS can preserve the relevant information stored in these electronic folders. E-mail and computer accounts of employees that have been placed on a litigation hold by College Counsel will be maintained by ITS until the hold is released. No employee who has been notified by College Counsel of a litigation hold may alter or delete an electronic record that falls within the scope of that hold.

Appendix A – Record Retention Schedule

Due to limited storage space, Eckerd College contracts with Iron Mountain to store its documents.

- a) ACT = While active, employed, or enrolled
- b) LIFE = Life of affected employee
- c) PERM = PERM

Documents that are superseded or identified for destruction must be shredded.

INSTITUTIONAL & LEGAL RECORDS	
Articles of Incorporation	PERM
Charter	PERM
By-Laws	PERM
Names and addresses of directors and officers	Retain until superseded
Minutes of Board meetings	PERM
Minutes of Board Committee meetings	PERM
Licenses	ACT
Expired licenses	PERM
Policy Statements	10 years
Contracts	ACT + 4 years
Patent and Trademark records	ACT + 6 years
LITIGATION RECORDS	
Claims	ACT
Court documents and records	ACT

Deposition transcripts	ACT
Discovery materials	ACT
Litigation files - cases involving an action on a judgment or decree from a Florida court (settlement date or date judgment obtained or last appellate order, whichever is later)	20 years from the date the matter is closed (settlement date or date judgment obtained or last appellate order is issued whichever is later)
Contracts with State or Federal agencies	PERM
ADMISSIONS & FINANCIAL AID RECORDS	
Admissions and enrollment final reports, including original targets and current enrollments	3 years
Recruitment materials	10 years
Applicant files including acceptance letters, applications/data forms, relevant correspondence, test scores, *letters of recommendation and access waivers, military documents, recruitment materials, transcripts (high school and/or other colleges)	4 years
Student Aid Reports (SAR) & Institutional Student Information Record (ISIR)	3 years from the last day of the award year in which the student last attended
Pell Grant statements	3 years from the end of the award year
State Grant rosters	3 years from the end of the award year
Admission Records: Students Denied Admission	3 years after application submitted
Admission Records: Unregistered Students	3 years provided applicable audits have been released
FINANCIAL AID	
Applications for financial aid	ACT + 5 years
Financial aid awards	ACT + 5 years

Lender's Name and Address	ACT + 5 years
FISAP Report	6 years
Job placement	ACT + 5 years
Repayment history	ACT + 5 years
REGISTRAR	
Enrollment and degree verifications	1 year after graduation or withdrawal
VA student files	3 years from last certification
Student address change forms	1 year after graduation or withdrawal
STUDENT FILES ON ENROLLED STUDENTS	
Academic Transcripts	PERM
Applications for admission	PERM
Acceptance letters / relevant correspondence	PERM
Admission high school and / or college transcripts	PERM
Advanced Placement records	PERM
Test scores (entrance examination and institutional testing)	PERM
Academic Review Committee action other than dismissal	1 year after graduation or withdrawal
Academic Review Committee action relevant to dismissal	PERM
Area of Concentration contract	PERM
Collegium / Major / Mentor Assignments	PERM

Correspondence, relevant	PERM
Degree audit records	PERM
Graduation verification	PERM
FERPA related documents, Dependent Student form	1 year after graduation or withdrawal
FERPA related documents, record requests and disclosures including subpoenas (other than Directory information requests or student requests for their own records)	PERM
Non-disclosure of Directory information requests	PERM
Independent Study / Internship contracts	PERM
Directed Study contracts	1 year after graduation or withdrawal
International student documents other than those retained by the International Student Programs Office	PERM
Minor Declaration forms	PERM
Name and gender change authorization records	PERM
Permission to transfer credit forms	PERM
Request for withdrawal or leave of absence	PERM
Petitions for Special Academic Consideration	PERM
Plagiarism letters, graduates	PERM
Plagiarism letters, non-graduates	PERM
Senior Thesis / Senior Project contracts	PERM
Transfer credit evaluations	PERM

College Program Series cards	1 semester
College Program Series attendance	PERM
Final grade rosters	PERM
Requests for withdrawal or leave of absence from school	1 year
Change of grades	PERM
Class lists	PERM
Student schedules	PERM
Enrollment statistics	PERM
Transcript Requests	1 year after submitted
Final graduation lists	PERM
Registrations and changes in course registration (add / drop, withdrawal, audit)	PERM
Applications for Degree	1 year after graduation
Catalog	PERM
Commencement programs	PERM
Classroom schedules	PERM
Faculty schedules	PERM
STUDENT RECORDS (Other than Admission & Registrar)	
Applicant statistics	5 years
Enrollment statistics	10 years
Grade statistics	10 years
Racial / Ethnic statistics	3 years
Campus Crime Reports (annual)	4 years

Campus Crime Reports (interim)	2 years
Health and Counseling client files	7 years after last contact
Immunization records	PERM
Disability Services client files	7 years after last contact
Student complaints	5 years after graduation or date of last attendance
Counseling records	7 years from last contact
Student information forms	4 years
Student contact records, employer database, internship database	PERM
Medical credential files	3 years
Internship documents	4 years
Employer data	5 years
Grad employment surveys	5 years
Student discipline records	7 years
Student discipline records involving suspension or expulsion	PERM
Safety & Security policies and statistics report	7 years, per federal statute
Accident Records: Student/Employee	5 years after report
Parking tickets	5 years after report
Incident Reports	5 years after final disposition, provided applicable audits have been released
Safety –to-Life Inspection Records	3 years, provided applicable audits have been released.
Immigration records including copies of passport, I-20, DS-2019, I-94, Visa, and other immigration	Prior to SEVIS [Student and Exchange Visitor Information System]

related documents (Includes students on student visas and on student exchange visas)	implementation (August 2003): 1 year after completion of studies Post-SEVIS records: PERM
Eligibility records for verification to NCAA or National Athletic Association	5 years
Equipment files / reports	5 years
Game arrangement records—reference record of past game arrangements and schedules	5 years
NCAA or National Athletic Association infractions, appeals, and required data/reports	5 years
Official copies of event programs, media information, or promotional literature	2 years
Parental consent records	7 years
Play books—strategies, practice time, game plays for each game and season	5 years
Recruiting files—if student matriculates	5 years
Recruiting files—if student does not matriculate	Until business need ceases
Scores, team statistics about each game and the season for each sport	2 years
Team rosters	2 years
Training room medical and insurance records	7 years from date of last contact
Student groups / organizations records	PERM
Student Government (ECOS)	PERM
Student Handbook	5 years
Discipline records involving suspension or expulsion	PERM
Housing contracts	4 years

Student groups/ organizations records	PERM
Eckerd College Organization of Students	PERM
Expulsion records: student	5 yrs after graduation, transfer or withdrawal
Student employment records	3 years after termination of employment provided applicable audits have been released
Student newspapers	PERM
Student newspapers: supporting documents	30 days
LIBRARY RECORDS	
Patron records on Voyager	18 months after graduation
Circulation records (bills and fines)	Until transaction is completed (5 years)
Catalog of holdings	Until superseded
Undergraduate reference guides	Until superseded
Order records	Retain 1 master; others until superseded
Contract and licensing related files	Retain for 5 years after expiration or final payment
Courtesy Borrowers records	Until term expires
Friends records	PERM
Interlibrary loan records	PERM
Reference statistics records	Four years
Serial records	PERM until legal duration of license expires
<ul style="list-style-type: none"> • Payment history • Licensing Agreements 	
Special projects / events / memorabilia	10 years

Instructional manuals and handbooks	Until superseded
Library Staff Meeting [Minutes?]	PERM
MAILROOM	
Processing <i>Acknowledgement Form</i> (NOCA) [Delete?]	2 years per the Privacy Act of 1974
Forwarding addresses of previous students	18 months
USPS “Target” report	1 year
Mail Service permits	1 year after expiration
HUMAN RESOURCES / EMPLOYEE FILES	
Job applications, resumes, or any other form of employment inquiry whenever submitted in response to an advertisement or notice of job opening, including Records pertaining to failure or refusal to hire any individual	1 year from date record made or personnel action taken
Records relating to promotion demotion, transfer, selection for training or apprenticeship, layoff recall, or discharge of any employee	1 year from date record made or personnel action taken
Employee Evaluations	3 years
Faculty Contracts	PERM
Faculty course evaluation forms	3 years
Faculty tenure records	PERM
Original hiring Visa, associated documents, official transcripts	PERM
Job orders submitted to an employment agency or labor organization for recruitment of personnel	1 year from date record made or personnel action taken
Results of any physical examination if such is considered in connection with a personnel action	1 year from date record made or personnel action taken

Advertisements or notices relating to job openings, promotions training, or opportunities for overtime work	1 year from date record made or personnel action taken
INS Form 1 (Employment Eligibility Verification Form)	3 years after date of hiring, or 1 year after date of employee's termination, whichever is later
403 (b) selection	PERM
Disability records	PERM
Actuarial records	6 years
Layoff or termination records	6 years
Retirement plans (after expiration)	6 years
Forms 5500 & summary annual reports for all benefit plans	PERM
Workers' Compensation claim / litigation files	20 years from the date the matter is closed (settlement date or date judgment obtained or last appellate order is issued whichever is later)
Unemployment Compensation claim files	20 years from the date the matter is closed (settlement date or date judgment obtained or last appellate order is issued whichever is later)
Records of workplace accidents or injuries resulting in death	20 years from the date the matter is closed (settlement date or date judgment obtained or last appellate order is issued whichever is later)
Basic payroll and employee data (as required by the FLSA in the payroll section)	3 years
Dates and hours FMLA leave is taken	3 years
Hours worked in previous 12 months	3 years
Copies of employee notices furnished to employer	3 years

Copies of general and specific notes given to employees	ACT + 3 years
Documents describing employee benefits or employer policies regarding taking of paid and unpaid leave	3 years
Resumes of staff hired	ACT + 1
Documents verifying premium payments of employee benefits	3 years
PAYROLL RECORDS	
Overall payroll records	4 years
Leave records	4 years
W-2 form	6 years
W-4 form	6 years
I-9 forms	ACT + 3 years
Garnishments	ACT
Leave records	2 years
For each employee:	
Name and SSN	5 years following the calendar year in which created
Beginning and end dates of each pay period	5 years following the calendar year in which created
Dates on which work was performed during each pay period.	5 years following the calendar year in which created
Date and amount of wages paid for each pay period	5 years following the calendar year in which created
Complete home address	5 years following the calendar year in which created

Date of birth	5 years following the calendar year in which created
Sex (for purposes of Equal Pay Act)	5 years following the calendar year in which created
Occupation	5 years following the calendar year in which created
Time of day and day of week on which employee's work week begins	5 years following the calendar year in which created
Regular rate of pay	5 years following the calendar year in which created
Regular rate of pay for overtime weeks, the basis for determining the rate, and any payments excluded from the regular rate	5 years following the calendar year in which created
Straight-time earnings	5 years following the calendar year in which created
Overtime premium earnings	5 years following the calendar year in which created
Additions to and deductions from wages for each pay period (i.e., bonuses, withheld taxes, benefits contributions, garnishments)	5 years following the calendar year in which created
Total wages for each pay period	5 years following the calendar year in which created
Date of payment and pay period covered	5 years following the calendar year in which created
ACCOUNTS RECEIVABLE RECORDS	
Outstanding Promissory Notes	PERM
Satisfied or paid in full	Released to student, once satisfied
Cash receipts	4 years
Uncollected accounts	4 years

Collection records	4 years
Invoices to students	7 years
ACCOUNTS PAYABLE RECORDS	
Purchase Requisitions/Work Orders	4 years
Purchase Orders	7 years
Invoices from vendors	7 years
Accounts Payable ledgers	13 years
Payment / Disbursement record	7 years
Expense reports	7 years
Insurance payments	4 years
FINANCIAL RECORDS	
General Ledger	PERM
Financial statements, year-end (others optional)	PERM
Auditor's reports	PERM
Bank statements	ACT + 2 years
Bank reconciliations	PERM
Bond documents	PERM
Annual Reports: federally funded programs	3 FY after termination of federal funds
Grant files f Funded	3 years after completion of grant, provided applicable audits have been released
Grant files – GEPA-related	5 years after completion of grant, provided applicable audits have been released
Vendor invoices	7 years

Financing documents, credit agreements, loan agreements, and commitments	PERM
Contracts with Auditors	PERM
Records of investments	PERM
Contracts with State or Federal agencies	PERM
Contracts with vendors	5 years after expiration or termination date
Contracts with independent contractors	5 years after expiration or termination date
Contracts with consultants	5 years after expiration or termination date
FEDERAL TAX RECORDS	
Tax returns worksheets, documents, and reports relating to income tax liability	Until business need ceases
Form 990	PERM
Form 990-T	PERM
Form 1098-T	7 years
Form 1099	7 years
Sales Tax Returns	ACT + 7 years
ADVANCEMENT	
Gift record receipts	7 years
Alumni records	PERM
Annuity Gift Agreements	PERM
Gift Pledge forms	6 years from date of last scheduled payment or until gift is fully paid
Life Income Agreements	PERM

Restricted Contribution notification letters	3 years after restriction lapse
Support for Endowment contributions	PERM
Unrestricted Contribution notification letters	PERM
SPECIAL PROGRAMS	
Leadership Development Institute	
Cancelation and Transfer files	1 year after program date
Participant List / Assessment Packet / Evaluations / Group Picture	PERM
Green Files (registration financial file, assessment info, evaluations)	2 years after program date
Custom participant files	PERM
Coaching contracts & financial files	3 years
Coaching participant files	Until coaching process is completed
CDP invoice logs/receipts	PERM
Open Enrollment Feedback files	1 year after program date
CONTINUING EDUCATION CENTER	
Conference files	5 years after program date
Conference contracts, invoices - electronic	PERM
ELS student files	2 years
Lodge guest information & accounting	2 years
Elderhostel	
Health & Safety forms	3 months after program date
Summer Conferences	
Contracts, insurance forms, tax exempt certificates, invoices, payments	5 years after program date

ELS Homestay / Volunteers	
Homestay applications	5 years
Homestay financial activity	5 years
Volunteer application & hours donated	PERM
OLLI	
Member data	2 years
Class evaluation	2 years
Historical record	PERM
Advisory Council minutes	PERM
Writers in Paradise	
Applications / manuscripts	1 year
ACT	
Participant records (application form, grading reports)	3 years from attendance to the program
ASPEC	
Member data	PERM
Strategic Planning records including planning cycle and implementation	PERM
Documents including Self Study, Visit Report, Recommendations, Responses	10 years for hard copies; electronic version saved until business need ceases
INSTITUTIONAL RESEARCH	
Accreditation reports (HLC [Higher Learning Commission], NCATE [National Council for Accreditation of Teacher Education], ABA [American Bar Association], State Board of Teaching)	PERM

Clearinghouse data	1 year
Self-studies, surveys / reviews	10 years
IPEDS [Integrated Postsecondary Education Data System] surveys	10 years; available online from National Center for Education Statistics
US News surveys	10 years; not available online
US News America's Best Colleges issues	10 years for hard copies
Academic Libraries surveys	7 years
Alumni surveys	5 years, archive results on shared drive
Commercial publication surveys (Peterson's, College Board, etc.)	5 years
State registration	7 years
NCAA [or National Athletic Association] finance survey	5 years
CAPITAL RECORDS	
Property records / inventory	PERM
Equipment inventory	ACT
Depreciation schedules	PERM
Mortgage records	PERM
Property improvement records	PERM
Specific real estate documents:	PERM
<ul style="list-style-type: none"> • Title Abstracts • Warranty Deeds • Conveyances and other title documents • Purchase and Sale agreements and closing statements and documents • Easements 	

- Licenses
- Paid Property Tax Receipts

Building certificate of occupancy **2 years (shred when new certificate is issued)**

FACILITIES & ENVIRONMENTAL RECORDS

Reduced pressure back flow preventer test report **10 years**

Existing fuel burning equipment safety test report **2 years (report created every 2 years for individual homes)**

Annual air emissions report **10 years**

Annual boilers and pressure vessels report **10 years**

Physical inventory records **10 years**

Elevator certification **1 year (shred when new certificate is issued)**

Fire alarm annual inspection report by building **2 years (shred when new certificate is issued)**

Annual agreement and report of building sprinkler system **2 years (shred when new certificate is issued)**

Smoke detector inspection affidavit **2 years (shred when new certificate is issued)**

Warranties **Life of Warranty – then shred**

Facilities stock room sign out form **7 years**

Building permits **ACT + 1 year**

Building plans and specifications **PERM**

Office layouts **ACT**

Operating permits **ACT**

Maintenance records **ACT**

Motor vehicle records	ACT
Hazardous chemical waste records	5 years
EPA audit & compliance records	PERM
Material safety data / employee safety records	6 years
Certificate of title for motor vehicle	Until vehicle sold
Asbestos building survey report	PERM
Material safety data sheets	Useful life of item
INSURANCE RECORDS	
Property insurance	The later of seven years after expiration or after the last claim is closed
Flood insurance	The later of seven years after expiration or after the last claim is closed
Crime insurance	Fireproof container; PDF version archived on server for seven years
General liability insurance	The later of seven years after expiration or after the last claim is closed
Excess liability insurance	The later of seven years after expiration or after the last claim is closed
Pollution liability insurance	The later of seven years after expiration or after the last claim is closed
Auto liability insurance	The later of seven years after expiration or after the last claim is closed
Internet liability insurance	The later of seven years after expiration or after the last claim is closed
Sexual misconduct liability insurance	The later of seven years after expiration or after the last claim is closed
Workers compensation liability insurance	The later of seven years after expiration or after the last claim is closed

Educators legal liability insurance	The later of seven years after expiration or after the last claim is closed
Fiduciary liability insurance	The later of seven years after expiration or after the last claim is closed
ARCHIVAL RECORDS	
Accession records	Permanent
Appraisal records	Permanent
Collections control records	Until superseded for reference guides and finding aids; permanent for all other records
Correspondence, general	10 years
Exhibit records	Permanent for exhibit descriptions or scripts, renderings and layout diagrams, photographs, and lists of items included; 10 years for all other records
Loan records	After termination of loan: 5 years in-house; 10 years for other institutions
Patron and visitor records	Permanent
Purchasing records	10 years except for major purchases, which are kept for the life of the item
Reference request / research records	Permanent if they add to accumulated knowledge; otherwise, 10 years

EPA PROGRAM	TYPE OF RECORD	APPLICABLE REGULATION	RECORD RETENTION PERIOD
CAA2	Measurements, Performance, Tests	40 CFR 60.7 (f) Notification and Recordkeeping	2 years

CAA	Monitoring Data, Calibration Checks	40 CFR 61.14 (f) Monitoring Requirements	2 years
CAA	Emission Test Results	40 CFR 61.33 (e) Stack Sampling	2 years
CAA	Title V Operating Permit Records	40 CFR 70.6 (a)(3)(ii)(A)(6) Permit Content	5 years
SPCC ₃	SPCC Plans & Inspection Records	40 CFR 112.7 (e)(8) Guidelines for Preparing & Implementing SPCC Plan	3 years
NPDES ₄	Permit Application Records	40 CFR 122.21 (p) Application for a Permit - (p) Recordkeeping	3 years
NPDES	Permit Monitoring Records	40 CFR 122.41 (j)(2) Conditions Applicable Permits (i) Monitoring/ Records	3 years
RCRA ₅	Hazardous Waste Manifests	40 CFR 262.40 (a) Recordkeeping	3 years
RCRA	Biennial Reports	40 CFR 262.40 (b) Recordkeeping	3 years
RCRA	Exception Reports	40 CFR 262.40 (b) Recordkeeping	3 years
RCRA	Test Results, Waste Analysis	40 CFR 262.40 (c) Recordkeeping	3 years

RCRA	Inspection Log or Summary	40 CFR 265.15 (d) General Inspection Records	3 years
RCRA	Training Records	40 CFR 265.16 (e) Personnel Training	3 years for former employees
RCRA	Contingency Plan	40 CFR 262.40 (d) Contents of Contingency Plan	While generating
RCRA	Closure Plan/ Amendment/ Records	40 CFR 265.112 Closure Plan; Amendment of Plan	~ Closure
RCRA	Closure Plan/ Amendment/ Records	40 CFR 265.118 Post-Closure Plan; Amendment of Plan	~ Closure +
RCRA	Closure Cost Estimates	40 CFR 265.142 (d) Cost Estimate for Closure	~ Closure
RCRA	Post-Closure Cost Estimates	40 CFR 265.142 (d) Cost Estimate for Post-Closure Care	~ Closure +

EPA PROGRAM	TYPE OF RECORD	APPLICABLE REGULATION	RECORD RETENTION PERIOD
UST ⁶	Corrosion Inspection Records	40 CFR 280.31 (d)(1) Operation & Maintenance of Corrosion Protection	Keep results of last 3 tests
UST	UST Repair Records	40 CFR 280.33 (f) Repairs Allowed	UST Life +
UST	Inspection/ Repairs/ Investigation	40 CFR 280.34 (b) Reporting and Recordkeeping - (b) Recordkeeping	UST Life +
UST	Release Detection Records	40 CFR 280.45 (a)(b)(c) Release Detection Recordkeeping	5-1/2 years

UST	Closure Records	40 CFR 280.74 Closure Records	Closure + 3
UST	Financial Responsibility	40 CFR 280.11 Recordkeeping	UST Life +
EPCRA ⁷	Tier II Reports & Documentation	40 CFR 370.25 (d) Inventory Reporting	Not Specified
EPCRA	Form R Reports & Documentation	40 CFR 372.10 (a) Recordkeeping	3 years
PCB ⁸	Annual Document Logs	40 CFR 761.180 (a) Records and Monitoring - (a) in Service/Disposal	3 years after PCB's gone
PCB	PCB Manifests	40 CFR 761.209 (a) Retention of Manifests Records - (a) Generator	3 years
CAA	Measurements, Performance, Tests	40 CFR 439.04 (2) Recordkeeping	5 years

EPA PROGRAM	TYPE OF RECORD	APPLICABLE REGULATION	RECORD RETENTION PERIOD
CAA	Monitoring Data Calibration Checks	40 CFR 439.04 (2) Recordkeeping	5 years
CAA	Emission Test Results	40 CFR 439.04 (2) Recordkeeping	5 years
CAA	Annual Reports and Backup Data	40 CFR 438.03 (4) Required Records	5 years
RCRA	Hazardous Waste Manifests	40 CFR 615.08 (7) Manifest System	3 years
RCRA	Annual Reports and Backup Data	40 CFR 615.11 (1)(c) Reporting	3 years

RCRA	Exception Reports	40 CFR 615.11 (2)(c) Reporting	3 years
RCRA	Test Results, Waste Analysis	40 CFR 615.06 (5) Hazardous Waste Determination	3 years
RCRA	Inspection Log or Summary	40 CFR 615.05 (4) General Requirements	3 years
RCRA	Training Records	40 CFR 630.16 (5) Personnel Training	Closure
CWA ⁹	Stormwater Records	40 CFR 216.29 (7) Compliance and Reporting Requirements	5 years
OSHA PROGRAM	TYPE OF RECORD	APPLICABLE REGULATION	RECORD RETENTION PERIOD
Record	Exposure Record	29 CFR 1910.1020 Exposure	30 years from exposure
Record	Medical Record	29 CFR 1910.1020 Medical	Employment Duration plus 30 years

OSHA PROGRAM	TYPE OF RECORD	APPLICABLE REGULATION	RECORD RETENTION PERIOD
Training Record	Blood borne Pathogens	29 CFR 1910.1030 Blood Exposure	Annual update
Training Record	Hearing Conservation	29 CFR 1910.95 Hearing Exposure	Annual update
Training Record	Respirator	29 CFR 1910.134 Breathing Exposure	Annual update
Training Record	Lockout/Tagout	29 CFR 1910.147 Maintenance Exposure	Annual update
Training Record	Electrical	29 CFR 1910.333 Maintenance Exposure	Annual update

Training Record	Permit Required Confined Space	29 CRF 1910.146 Maintenance Exposure	Annual update
Training Record	Process Safety	29 CRF 1910.119 Maintenance Exposure	Annual update
Training Record	PPE Hazard Assessment	29 CRF 1910.132(d) Physical Hazard Exposure	Update upon changes
Training Record	Emergency Action	29 CRF 1910.38 Emergency Exposure	Annual update
Training Record	Fire Prevention	29 CRF 1910.39 Fire Exposure	Annual update
Training Record	HAZWOPER	29 CRF 1910.120 Chemical Exposure	Annual update
Training Record	Fire Extinguisher	29 CRF 1910.157 Fire Exposure	Annual update
Training Record	Fire Hose	29 CRF 1910.156 Fire Exposure	Annual update
Training Record	Lift Truck	29 CRF 1910.178 Physical Hazard Exposure	Update upon changes
Training Record	Hoist	29 CRF 1910.179 Physical Hazard Exposure	Update upon changes
Training Record	Sling	29 CRF 1910.184 Physical Hazard Exposure	Update upon changes

APPENDIX B - Carton Log-In Page from Vendor's Website

Record Center Home | Help | Logout

IRON MOUNTAIN®

RecordCenter
powered by the SafeKeeper PLUS system

Search Orders Add Records Preferences Administration

Search Records GO Advanced Search Cart Empty

Add Records

Add Records function allows you to create metadata about your box and file records. Fields marked with an asterisk (*) are required. If you customize the page, be sure to save your changes before exiting.
[Customize the layout of this page.](#)

Customer: T066D [ECKERD COLLEGE]
Data Format: Box

Last record added: Records Added: 0

SKP Box/Barcode Number: [Lock](#)

Customer Box Number*: [Lock](#)

Department Id*: [Lock](#) MASTER DEPARTMENT [lookup](#)

Major Description: [Lock](#)

Minor Description: [Lock](#)

Alpha From: [Lock](#)

Alpha To: [Lock](#)

From Date: [Lock](#) / / (MM/DD/YYYY)

To Date: [Lock](#) / / (MM/DD/YYYY)

Destruction Indicator: [Lock](#)

Destruction Date: [Lock](#) / / (MM/DD/YYYY)

[Reset](#) [Add Record](#)

https://recordcenter3.safekeeperplus.com/aware/inventory/newRecords.do?method=initPage

APPENDIX C: OFFICIAL RECORD TRACKING LOG

Name or Category of Official Record	Author	Person Responsible for Active Official Record	Date Record is to Be Purged	Date Record Was Actually Purged	Person Who Actually Purged Record	If Not Purged, Location of Record	Reasons Why Not Purged	Other Notes Regarding This Official Record

APPENDIX D

Notice of Obligation to Preserve Relevant Documents

Eckerd College has been notified that there may be a potential lawsuit or administrative agency charge brought by [SPECIFY]. As a possible defendant, we are required to take steps to preserve and retain all relevant documents and materials that are in the possession, custody, or control of the College, its officers, employees, Board Members, and affiliates, and to provide that they are not destroyed. This memorandum describes the steps we must take.

What needs to be preserved

Please note that in this context, the obligation to preserve "documents" applies to hard copy and electronic forms. The "documents and materials" include, but are not limited to folios, reports, statements, correspondence or communications of any kind (including E-mails), memoranda, customer complaints, contracts, personnel files, incident reports, investigation files, sales records, payroll records, surveillance materials, written materials, graphs, charts, and files, any relevant information held on a computer database or disk, tape recordings, microfiche, video and film as well as notes, draft documents, calendars, card files, appointment books, and the like, which relate to [SPECIFY NATURE OF CLAIM]. This also includes all copies of the same documents. If you have any questions, regarding what documents and materials need to be retained, please direct specific questions to me.

Time Period

The documents and materials that need to be preserved are those created or in existence [SPECIFY RELEVANT TIME PERIOD. This will vary from a personnel action, to a personal injury claim, to a breach of contract. At a minimum, it will be from a date prior to the date of the incident giving rise to the claim (e.g. two years) until the present time.].

How to Preserve the Documents and Materials

Do not destroy any documents and/or materials relating to the claims, even if they would otherwise be routinely discarded or destroyed in the ordinary course of your business. This includes preventing any periodic purging or deletion of documents or information (including e-mails) off computer systems that might otherwise occur. Computer records may be archived to

disk or tape, but they may not be destroyed. Specifically, please preserve voicemail and E-mail messages.

Conduct a diligent search of your on-site files to identify and secure for review by Eckerd College's attorneys any documents relating to the claim. As noted above, this includes the identification of all computer-stored information, e-mail, notes, drafts, and tapes of telephone conversations, folios, reports, statements, personnel records, payroll records, and surveillance materials, if any. Make a memo of when you conducted this search and what files you searched

For all relevant databases, hard drives and e-mails, please download onto a CD-Rom and label with your name, date, and summary of contents. Please forward the completed CD-Rom to me. For all paper documents related to [SPECIFY THE CASE], please forward complete copies to me and specify the location of the original documents.

To the extent, you or your staff may have sent potentially relevant documents off-site to archives or storage, identify those documents and immediately contact me to obtain further instructions.

Do not create any new documents describing or commenting on any of the documents or materials located, or on the nature of the merits of the underlying proceeding itself, without first speaking with our outside counsel or General Counsel.

This memorandum does not specifically identify all of the documents and materials that must be retained. If you are unsure of the nature or extent of your responsibilities, or if you are aware of additional personnel to whom this memorandum should be sent, please contact me.

To preserve the confidentiality of this information and the College's legal rights, please do not discuss this case with anyone, even others within Eckerd College (except as necessary to fulfill these document preservation obligations). If you are contacted by anyone from outside the College (other than our outside counsel or General Counsel) regarding this case, please decline the opportunity to speak and advise me that you have been approached.

Our outside counsel for this matter is:

[SPECIFY]