

Records Retention Policy at Sarah Lawrence College

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I. Purpose and Scope

This policy and procedure provides for the systematic review, retention and destruction of documents received or created in the transaction of Sarah Lawrence College (“College”) business. The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent document destruction of records and to facilitate College operations by promoting efficiency and reducing unnecessary storage of documents. Approved by Senior Staff, this policy applies to all records of the College and is managed and implemented by the College Archives in consultation with the Vice President for Finance and Planning.

Sarah Lawrence College retains and preserves vital records of its business and operations to preserve an historical record of the College, to ensure current and future operations, and to comply with its legal obligations.

This policy and procedure applies to all College employees and faculty.

II. College Archives

The College Archives oversees the preservation and availability of official records of Sarah Lawrence College, an authority given to it in 1997 by the Board of Trustees. The College Archives acts as a central entity for the storage of records that have long-term value as well as those records deemed of permanent and, therefore, archival value to the College.

Records that have been placed in the College Archives for permanent retention will be open for users according to the policies of the College Archives and within the discretion of the Archives staff. For more information, see the College Archives Access Policy (Attachment A).

III. Definitions

A. Record

A record is anything containing information reflecting College educational and business transactions regardless of format (paper, digital, photographic, recordings, etc.). Typical records

include official publications, fiscal data, incoming/outgoing correspondence including email, meeting minutes, reports, and student files.

Not all records must be retained. The list below describes items in a typical office that are not classified as records and therefore do not need to be categorized or maintained. These materials may be destroyed at any time if they are no longer needed by the office holding them. These items will not appear on a retention schedule.

- large quantities of duplicate materials and all duplicates of “official copies”
- non-SLC published magazines and newspapers
- published reports produced by other entities
- purchased data from other sources
- catalogues, journals or other printed matter created by other entities used for informational purposes
- notes or working papers once a project is complete, unless they provide more complete information than the final report

B. Active Records

Records that are generally referred to once a month or that are needed to support the current business activity of an office or division.

C. Inactive Records

Records that have not been needed for at least one year or for which the active period has passed.

Unless these records (both active and inactive) have been defined as permanent or archival records they should be destroyed according to the time period shown on the retention schedule. Inactive records should be securely stored until the end of the retention period.

D. Permanent Records

Also known as archival records, permanent records have historical, administrative, or research value to the College, which the College keeps indefinitely. The College Archives is responsible for ensuring that the College identifies these records and that they are transferred to the College Archives once they become inactive. The College Archivist assists in the identification and classification of records as archival.

E. Retention Schedules

An internal document describing categories of records, providing a length of time they should be kept and includes instructions for disposition. State or federal law may determine the period that certain records must be kept. The General Retention Schedule at the end of this policy lists the most common records at the College and provides a retention period along with any special instructions related to disposal. **Almost every office or department will have records requiring retention that are not on the General Retention Schedule. Records that are not on this schedule should be added on a case by case basis in consultation with the College Archives.**

F. Retention Period

Minimum required length of time for which a College office or department is responsible for maintaining records. Custodians may hold records longer than the retention period, but the College Archives does not provide space for storage of non-permanent records.

G. Records Destruction

The physical or electronic destruction of a record after it has become obsolete or otherwise in accordance with this policy.

H. Disposition of Records

The terminal treatment of records, either through destruction or permanent storage with the College Archives.

I. Records Custodians

A senior member of management who has supervisory authority over a particular business practice, and, in that capacity, who has responsibility for ensuring effective implementation of this policy in his or her area of authority. See further information on the responsibilities of Records Custodians in section V, part A.

J. Litigation Hold

A communication issued as the result of current or anticipated litigation, audit, government investigation or other similar matter that suspends the normal process regarding the retention and disposition of College records.

IV. Policy

A. Overview

It is the policy of the College to ensure that its records are preserved to provide documentation of the College's history and to be retained for the periods of time necessary to satisfy the College's business and legal obligations. The records will be disposed in accordance with an established records retention and disposition schedule. Certain records are permanent records and may never be destroyed.

A Records Custodian will oversee the day-to-day transactions related to the office's records-related functions and manage the disposition of records at the conclusion of the designated retention period. The designated primary contact for this policy is the College Archivist. The College Archivist, Vice President for Finance and Planning, and Senior Staff are the final arbiters of this policy.

B. Email

Email sent or received over the College's computer system may constitute a form of College record. While not all emails are business records, all College emails are property of the College and are subject to discovery in the event of litigation against the College or any of its employees, faculty or students. Consequently, the administration has the ability and the right to view the email of all members of the College community.

Faculty and employees of the College are not obligated to retain all emails indefinitely; such a policy would clearly impose an impossible burden both on the College community and on the College's computer network. Rather, individual employees and faculty members are expected to exercise judgment regarding the content and purpose of the email in determining whether it needs to be retained as a College record, and, if so, the length of the retention period. Any questions about retention of email should be directed to the Records Custodian and/or the College Archives.

Retention periods applicable to email messages are as follows:

1. Ordinary emails, including routine communications, internal meeting notices, and cover letters or transmittal memoranda, need be retained only so long as is necessary to complete the action or resolve the issue that is the subject of the email.
2. Administrative documents – To the extent that email is being used to document, either internally or outside the College community, the formulation, planning, implementation, interpretation or modification of a College program, policy or service, any such email constitutes a College record and should be retained in accordance with the retention periods set forth in the General Retention Schedule.

Emails can be retained in the following ways:

1. Emails can be printed out and filed and saved as paper documents;
2. Emails can be saved into electronic archive folders;
3. Emails can be saved on removable disks.

Regardless of the format in which the emails are saved, the Records Custodian for each office or division has an obligation to preserve and safeguard the information in the email as if it were a paper document. Once the email is saved in another format, however, there is no obligation additionally to retain the email in an active email folder.

C. Litigation Holds

Where the College has actual notice of litigation or of a government investigation or audit, or has reason to believe that such events are likely to occur, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In such event, the College will take steps to identify all paper and digitally maintained files that may contain documents relevant to the case, including emails, and will notify members of the College community to preserve such documents indefinitely. If an employee or faculty member receives such a preservation notice, it does not necessarily mean that they are involved in the litigation or investigation. Rather, it means that the evidence that the College is required to preserve may be in the employee or faculty member's possession or control, and that the employee or faculty member has an obligation to preserve such information effective immediately.

In the event of a litigation hold, all policies for the disposition of documents must be suspended with respect to those matters that are the subject of the hold. Electronic information should be preserved in its original electronic form on the media on which it is stored. Electronic

information should not be transferred from the media on which it is stored to a different media for the duration of the litigation hold **unless** such transfer is necessary to preserve the integrity of the information for the duration of the hold, and such transfers should be made only after consultation with the IT department to preserve the integrity of the electronic data. In addition, the employee and/or faculty member that receives the notice should similarly preserve any new information that is generated that may be relevant to the litigation or investigation by saving it in a segregated file.

An employee or faculty member's failure to preserve documents after having received a preservation notice can have extremely serious consequences for the College. Accordingly, a failure to comply with a litigation hold will subject employees to discipline, up to and including termination, and will be deemed misconduct that will subject faculty members to discipline in accordance with the Faculty Handbook.

V. Procedures

A. Essential Functions

1. Records Custodians

Each supervisor in a particular office or department has the responsibility for designating in writing a Records Custodian in their office or department and ensuring that the Custodian understands and is following with the records retention requirements applicable to that particular unit. The supervisor is also required to sign off on either destruction of documents at the conclusion of their retention period or any transfer of records to the College Archives.

The Records Custodian is expected to: understand the records created within the department or office; follow this policy to make decisions on retention and disposition of records and provide guidance to others who are involved in preparing records for storage; be responsible for ensuring that everyone in the office is aware of this policy and follows it; consult with the College Archives on matters related to retention and disposition of records; establish the level of confidentiality and security appropriate to specific types of records and help the department or office maintain and monitor confidentiality and security.

2. Chief Compliance Officer

The Chief Compliance Officer is responsible for notifying all relevant members of the College community where a litigation hold is being implemented. He or she will, in consultation with the relevant members of the College community, determine the scope of the hold, will determine when the hold is no longer required, and will communicate the lifting of the hold on an as needed basis to members of the College community.

B. Accessibility and Safekeeping of Records

1. Records, especially financial records, must be easily retrievable for examination by authorized individuals, including auditors. Access to electronic records is subject to College rules regarding information security. Records Custodians should work with the College Archives and IT department to ensure that electronic documents are maintained in a format that preserves accessibility.

2. In consultation with the College Archives, the Records Custodian is responsible for ensuring that active and inactive records are secured in a way to provide appropriate confidentiality and protection from unauthorized inspection, theft, and/or physical damage.

C. Disposition of Records

1. The Records Custodian is responsible for periodically determining which College records in their particular office or department have reached the end of their retention period and should therefore be destroyed or transferred to the College Archives.

2. The Records Custodian's supervisor is required to sign off on the destruction of documents or transfer to the College Archives.

3. Non-confidential paper records may be placed in containers for recycling. Confidential paper records must be shredded or other arrangements must be made for the documents to be destroyed.

4. The Records Custodian should consult with the IT department regarding the destruction of electronic documents.

D. Records Destruction

Following a retention schedule that has been developed with the assistance of the College Archives, records should be securely maintained for the period of retention either in the office or department where they were created or used. Records that have been identified as archival records must be sent to the College Archives for permanent retention.

Records that will not be listed on a retention schedule and therefore may be destroyed at any time include:

- material that is not considered a "record" (see definition of record);
- duplicates of an official copy which is stored and retained by another office such as personnel records, financial and budget information, copies of information used in an employee search;
- records that have served their purpose and are no longer needed such as drafts of reports and notes that have been turned into meeting minutes.

When there is doubt about whether or not a record may be destroyed, the custodian should review the retention schedule, consult with the custodian of the official copy of the record if one exists, and consult with the College Archives to ensure that there is no need to store or permanently archive the record.

Destruction includes:

Recycling – generally appropriate for all non-confidential paper documents, including public documents of other organizations, magazines, annual reports, newsletters, announcements, and drafts of policies or other memoranda which are not confidential.

Shredding – using a shredder for all documents that should not be read by other after they are no longer needed or that contain personnel or confidential information. This is essential for any document containing personal information, information that is student protected information under FERPA, health related information, or financial information.

E. Discipline:

Failure to follow this policy will subject employees to discipline up to and including termination of employment, and will subject faculty to discipline in accordance with the Faculty Handbook, except in the case of guest faculty, who are subject to discipline in accordance with the guest faculty member's contract.

VI. General Retention Schedule

This schedule will NOT include all records that should be on a schedule. Custodians should consult with the College Archivist to develop a retention schedule for records not mentioned here.

This schedule applies to all types of records, regardless of media or format, including documents, email, photographs, audiotapes, videotapes, CDs, and DVDs. Retention periods reflect minimum time periods. Records may be retained for longer periods of time at the discretion of the custodian or as required by legal counsel. Do not destroy any records while they are subject to audit, investigation, or where investigation is probable.

Records that are in storage areas such as basements or attics are often at risk of water damage or destruction and should be evaluated in light of this schedule. Consult with the College Archives for additional information on storage conditions.

Internal Operations

General Type	Description	Retention Period	Comments
Board of Trustees Records	Meeting minutes, agenda, reports, proposals, and supporting documentation	Permanent (College Archives)	Send to the Archives on a regular schedule.
Articles of Incorporation	Includes the documents the College is chartered under and the by-laws	Permanent (Secretary of the College)	
IRS Determination Letter	IRS Determination Letter	Permanent (Vice President for Finance and Planning)	
Legal Records	Documentation of legal cases involving the College	Permanent (Secretary of the College): Pleadings and final resolution. All other related information retain 3 years after final resolution of case.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Grievance Files	Documentation of grievances initiated by faculty and staff	Retain in the Office of Human Resources with personnel file until the file is destroyed.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.

Environmental Reports/OSHA Investigations	Investigation documentation or reports	Permanent (Director of Public Safety)	
Insurance Policies	All policies in effect on behalf of the College, students, faculty and staff	Maintain as long as active (Risk Manager's Office)	
College Tax Records	Documentation of the College's compliance with tax filing requirements	Permanent (Controllers Office)	
External and Internal Audit Records	Created by internal or external auditors to document their reviews, findings and recommendations	Permanent (Controller's Office): Final report. Other records: Retain 3 years after creation of the audit records.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Real Property Leasing/Rental Records	Documentation of the lease and rental of property	Retain 7 years after expiration of the lease.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Social Security Reports and Deposits	Periodic reports of wages and social security contributions paid by the College to each employee	Retain for 7 years (Controller's Office) after the fiscal year the transactions are recorded.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Unemployment Compensation Benefit Files and Reports	Documentation on eligibility of former employees for unemployment benefits and when these employees receive compensation charged against the College's account	Retain for 5 years (Office of Human Resources) after termination of employee.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
W-2 Listings	Documentation of salaries paid and taxes withheld for employees	Retain for 7 years (Controller's Office).	Destruction of records in this category should only be by shredder or

			other means that will make them unreadable.
Authorization/Allocation Letters	Awards of federal financial aid to the College	Permanent (Financial Aid and Controller's Offices)	
Payroll Records	Documentation of payroll, payroll deduction authorizations, garnishment records, pre-payroll reports and payroll check registers	Retain 7 years after termination (Human Resources).	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Time Sheets	Documentation of hours worked by employees	Student workers: Retain for 7 years. Staff: Retain for 7 years.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Bank Records	Transactions recorded in the College bank accounts and their reconciliation to the general ledger.	Retain 7 years after end of fiscal year (Controller's Office).	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Employee Benefit Plan Files	Documentation on employee enrollment in benefit plans	Retain 7 years after termination of employment.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Staff Appraisals, Promotion, Demotion and Discharge Documentation	Records documenting periodic evaluation, work performance and employment record of College staff	Retain 7 years after employee separation from College (Human Resources).	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Enforcement - Campus Parking Tickets	Citations issued and the administrative enforcement of	Retain 3 years after final disposition.	Destruction of records in this category should only

	parking rules and regulations. Issued by College Security.		be by shredder or other means that will make them unreadable.
Enforcement - Campus Incident Reports	Documentation of incidents that occur on campus that violate College and/or local laws and regulations. They contain case number, arrest report, incident report, date, time, complainant, address and details of the report (IAW Cleary Act)	Permanent (Director of Public Safety)	

Financial Records

General Type	Description	Retention Period	Comments
Financial Records - General	Budget worksheets, printouts, account books, ledger, purchase records, purchase orders, travel expense reports	7 years following the activity.	The Controller's Office is the official custodian of these records. If the Controller's Office has a copy of the record, the department may destroy its duplicate at the close of the budget reconciliation period. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Financial Records – Warranty and Purchase Orders	Warranty information, purchase orders with contractual terms	7 years following the date of purchase or 7 years following the end of the warranty period, whichever is	Destruction of records in this category should only be by shredder or other means that will make

		later.	them unreadable.
Financial Records – Debt Financing	All documents related to debt financing	20 years following the period of debt repayment	The Controller’s Office is the official custodian of these records. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Financial Documentation	Tuition and fee schedules, annual endowment fund reports, annual financial statements, etc.	Permanent	

Personnel Records

General Type	Description	Retention Period	Comments
Personnel Records	Documents related to employment, salary, benefits and performance evaluation.	7 years after termination of employment.	Personnel records are scanned and maintained online.
Faculty Professional Papers	Records related to faculty teaching, curriculum, committee work, or biographical materials	Permanent (College Archives)	Faculty members are encouraged to contact the College Archives upon retirement because these records often have permanent value to the College.
Faculty Appointment, Reappointment, Tenure and Promotion	All records related to appointment and subsequent history of individuals to join the faculty, including correspondence	Permanent (College Archives) For more details, see the filing policy for the Office of the Dean of the College.	Managed by Executive Assistant to the Dean of the College. Kept confidential. Transfer to College Archives after faculty member is no longer employed by the College.
Faculty Search	Vacancy announcement,	3 years following the successful hire or	The chair of the search committee is

	advertisements, applications, evaluations, references, correspondence, email and all documents or materials related to the search	close of the search without a hire. For more details, see the filing policy for the Office of the Dean of the College. As of 2008, all searches were done online through Simple Hire.	responsible for keeping and organizing a record of the search and for ensuring the destruction of duplicate copies. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Non-Faculty Search	Vacancy announcement, advertisements, applications, evaluations, references, correspondence, email and all documents or materials related to the search	Office of Human Resources retains for 3 years following the successful hire or close of the search without a hire. As of 2008, all searches were done online through Simple Hire.	The chair of the search committee is responsible for keeping and organizing a record of the search and for ensuring the destruction of duplicate copies. Destruction of records in this category should only be by shredder or other means that will make them unreadable.

General College Records

General Type	Description	Retention Period	Comments
College Policies and Procedures	Forms, procedure manuals, guides, handbooks, etc.	Destroy when they are no longer in effect. College Archives will retain policy documents permanently.	The department or office creating the record should provide a copy to the College Archives for evaluation.
Projects, Programs, Proposals	Notes from meetings, reports, conceptual documents, financial support, all records	Retain until a project has been completed and evaluate for permanent retention in	

	related to projects or programs developed by non-academic offices	the College Archives.	
College-wide Committee Records	Minutes, reports and other materials generated by College-wide committees including charges, substantive correspondence and work product, and reports and documents about or related to the operation of college-wide committees or other offices around the College. Examples – College-wide strategic planning, Commencement, General Committee.	Permanent (College Archives)	The chair of each committee is responsible for keeping and organizing a record of the committee's work and final recommendations and subsequent policy implementation and for transferring the records to the College Archives.
President's and Senior Administrative Officers' Records	Records related to the functioning of senior administrative offices including calendars, memoranda, correspondence, speeches, memorabilia, photographs, web site information, etc.	Permanent (College Archives)	Send to the Archives on a regular schedule.

Student Records

General Type	Description	Retention Period	Comments
Student Records – Admission Files	Application records for admission to the College created for undergraduate, graduate and transfer student applicants. The files may include	Permanent (Registrar): Registered students. Retain 3 years: Unregistered applicants.	Upon matriculation, admission files become registrar files. However, some material such as letters of recommendation are

	acceptance letters, letters of recommendation, placement records, transcripts, etc.		removed. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Student Records – Registrar	Student grades, transcripts, evaluations, and personal information (addresses, phone numbers, etc.)	Permanent (Registrar)	The official custodian of student records is the Registrar of the College.
Student Records – Graduation Lists	Lists of individuals who have successfully completed the degree requirements and have been graduated from the College	Permanent (Registrar)	
Student Records – Registration	Documentation of a student’s course registration and changes to registration	Retain 1 year after the student submits the change.	
Student Records – Financial Aid	Records showing evidence of providing financial aid including financial aid applications, federal student aid forms, federal tax forms, award letters and confirmations, verification records, interview records, students scholarships, fellowships and awards	7 years after graduation or separation. (Federal regulation)	Before destroying records related to special awards or scholarships, the College Archives should evaluate for permanent retention. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Student Records – Health Services	Records include medical as well as mental health histories, clinical notes, immunization records, and related correspondence.	7 years after graduation or separation.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.

Student Records – Student Discipline	Records relating to proceedings and decisions resulting from violations of the student conduct code, honor code, or other College policies	Suspensions and expulsions retained with the student’s permanent record. All other, retained 7 years.	Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Student Records – Athletic Participation	Records, including photographs, awards, etc. related to student participation in athletics	Permanent (College Archives): Summary documentation. All other records: 7 years after graduation or separation.	Before destroying photographs, the College Archives should evaluate for permanent retention. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Student Records – Activities and Government	Records related to student participation in special activities, student clubs, associations, and the Student Senate. Records related to any student organization or club.	Permanent (College Archives): final publications, photographs, artwork, memorabilia, policies and administrative records. All other records, 3 years after their administrative use ceases.	Permanent records should be sent to the College Archives on a regular schedule. Destruction of records in this category should only be by shredder or other means that will make them unreadable.
Student Records – Career Counseling Office	Records related to an individual student such as counseling notes and letters of recommendation.	3 years after administrative use ceases: Counseling notes. 10 years after inactivity: Letters of recommendation.	

Faculty Group Records

General Type	Description	Retention Period	Comments
Faculty Group	Records related to the	Until no longer	Before destruction

Records – General Office Records	routine daily administration of the department including memoranda, meeting minutes, correspondence, and administration of programs	administratively useful.	these records should be evaluated by the College Archives for historical value.
Faculty Group Records – Curricular Records	Course and curricular records including records pertaining to the planning, teaching, and evaluation of courses	Permanent (College Archives)	Send to the College Archives on a regular schedule.
Course and Curriculum Records	Includes college catalogs/bulletins, course schedules, syllabi and course outlines	Permanent (College Archives)	

Contract Records

General Type	Description	Retention Period	Comments
Contracts – Construction and Renovation	Records related to construction and renovation of real property	Permanent (College Archives)	Send to the College Archives on a regular schedule.
Contracts – Negotiation Records, Executed Contracts	Records related to the process to enter into a contract or agreement, or understanding including background support materials, drafts, memos, letters, and related correspondence. The contract itself and all attachments and amendments to it.	Where contracts and agreements were finalized: 7 years after contract expiration. All other records: retain until administrative use ceases.	
Capital Improvement Contract Records	Contractual Agreements for capital improvements	Permanent (Vice President of Operations)	
Grant and Contract Administration	Records related to the administration of	7 years after final payment or	Records related to proposals that were

	<p>federal and other grants, contracts, sponsored research projects, and agreements from negotiation to final performance such as grants-in-aid, state contracted services, and vendor contracts. Includes negotiation documentation, memoranda of understanding, agreements, contracts, amendments, terms, budget proposals, and related correspondence</p>	<p>completion of all obligations under the grant or contract and all subsequent renewals, whichever is later.</p> <p>Summary records such as proposal, award letter and selected deliverables and reports: Permanent (College Archives)</p>	<p>not funded may be kept as long as administratively useful and then destroyed.</p>
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Addendum to General Retention Schedule

I. Committee Records and Responsibilities of Committee Chairs

Chairs of all committees are the “official custodian” of the records related to the committee’s work. In general, all policy development, curricular change activities, meeting minutes, agenda, and supporting documentation will be of interest to the College Archives and result in permanent records. A copy of such records should be sent to the College Archives. If you have any questions, please consult with the College Archivist.

II. Personnel Records

The “official copy” of all records related to an employee are retained and maintained by the Office of Human Resources for non-faculty employees and by the Dean of the College for faculty members.

Students who work in jobs that are NOT part of their educational experience are treated as all other employees for the purposes of record keeping. However, most students are paid to do jobs as a result of a financial aid award or as an integral part of the SLC education. In that case, their employment information is maintained as a student record with the unique obligations associated with student records.

III. Employment Search Committee Records

At the end of a search, the chair of a search committee should collect from each member of the committee all files, notes, applications, recommendations, and other material related to that search. This material should be reduced to one “official copy” of each record with the rest destroyed. All email and other electronic records should be printed and kept with other print documents and the e-copy deleted from the email system. All search committee members should delete all electronic files related to the search from their computers, email programs, and hard drives. *In faculty searches the reduced paper file should be retained by the Dean of the College for 3 years and then destroyed. For all other searches, the complete paper file should be sent to and retained by Human Resources.*

IV. Faculty Professional Papers and Records

Faculty members are encouraged to contact the College Archives when they retire and to discuss the retention of their papers and records for historical preservation.

V. Records Related to Web Sites

Because web sites have replaced many publications they are a significant archival record of the College and its operation. Web masters and others creating web page content should capture copies of their web site’s content as electronic files and send them to the College Archives for permanent retention.

ATTACHMENT A

SARAH LAWRENCE COLLEGE ARCHIVES ACCESS POLICY (APPROVED BY SENIOR STAFF SPRING 2009)

The Sarah Lawrence College Archives assembles, preserves, and makes accessible the official records of Sarah Lawrence College. The Archives maintains historically significant non-current official records and publications of the College's administrative offices, academic departments and student groups. College archival records encompass those records stored in the Archives that were generated or received by the various administrative departments or offices of the College during the conduct of their business. The purpose of collecting such records is to provide documentation of the development and growth of the College, particularly of its primary function of teaching, its role in the community at large, the activities of its student body and alumnae/i, and the development of its campus.

The Sarah Lawrence College Archives is committed to providing researchers with the material they need. However, due to the confidential nature of certain records, access to some materials may be limited. Restrictions are placed on the use of records in order to protect the rights to privacy of individuals and the institution.

Access restrictions to records in the Archives are divided into three categories:

General Distribution:

Records in this category are open to researchers without restriction. Records in general distribution are the publications issued to the general public at the time of their creation, such as announcements, official college publications, calendars, brochures, and committee reports. This also includes the College charter, history and description of the College, building and grounds, visiting speakers, endowed chairs and professorships, College events and commencements, degrees, honors, awards and prizes, public relations, conferences, academic programs, and graduate programs. After processing, records of this type are open immediately without restriction.

Examples: Sarah Lawrence College Magazine, The Phoenix, Annual Report of the President, General Committee meeting minutes, photographs.

Files Containing Personal Information:

Records that contain personal and confidential information about an individual or individuals are closed for 75 years from date of creation or until the death of the individual mentioned in the records, whichever is longer. These records may include education records of living current or former students and records of living current or former faculty members, administrators, or other staff members, and donor records. Then, subject to review by the college archivist, the records are open without restriction. During the restricted period, access may be granted if the named individual gives permission in writing. Information that is part of the public record about an individual is available for research.

Examples: Appointment/reappointment letters, course evaluations, resumes, Advisory Committee on Appointments records, Committee on Student Work records.

General College Records:

General College Records are records of the administration of the College, its policies and programs that do not fall into either of the two previous categories. After processing, records of the administration of the College are restricted to use by the office/department of origin for 20 years from the date of creation. Officers of the College or administrators of departments may waive this time period at their discretion.

Examples: Correspondence among administrators on grading policy, annual reports, documentation on strategic planning among faculty and staff, International Programs proposals.

Exceptions to the 20-year restriction policy include:

- *Records of a sitting administration are closed.*
- *Board of Trustee meeting minutes are closed for 50 years from the date of creation.*
- *Board of Trustee biographical and correspondence files are closed for 75 years from the date of creation or until the death of the individual mentioned in the records, whichever is longer. Information that is part of the public record or published about an individual is available for research immediately.*
- *Selected documents in a series may have additional restrictions placed upon them if they constitute an invasion of privacy or expose the College to legal liability.*
- *Records may be restricted by Deed of Gift.*

Additional Conditions:

Records access policies and retention schedules for individual office's records are developed by the College Archivist in conjunction with the office of origin.

All records are reviewed for material that contains sensitive or private information. As a result, individual collections, or portions of them, may have restrictions placed on them that differ from the general restrictions listed above. The standard closure period of 20 years may be reduced or extended with the consent of the President or the office of origin.

A researcher may submit a written request for access to restricted records. This request will be sent for approval to the appropriate office, with the recommendation of the college archivist. In many cases, the archivist has authority to grant access to restricted materials.

Unprocessed records in any category are open only to the records creator.

Permission to examine does not imply the right to publish any part of a document.

The College Archives is subject to College-wide policy for protecting privacy and complies with both the Family Education Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA).