

WESTERN MICHIGAN UNIVERSITY

Record Retention Guide

© Business Services
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Guide to Retention of Business Records

A well-defined record retention program is an important part of Western Michigan University's record keeping system. The following list details some factors the University considers when retaining records.

Federal and state tax laws • It is not uncommon for retention of the same information and/or documents to be required by more than one governmental agency for different periods of time. Those records that have more than one retention period should be kept for the longest period to ensure compliance with laws and regulations.

Other government regulations • When there is no legal requirement for the retention of records, the retention policy should be reasonable and developed in good faith. For example, the Federal Paperwork Reduction Act of 1990 adopts a maximum 3-year retention period for any records other than tax, medical, or health.

Statutes of limitation on litigation that may affect your business • Consider statutes of limitation when decisions are made over the length of time particular records are retained. A systematic record retention and destruction program will reduce both litigation costs and exposure to liability. A general guideline would be six years.

The general needs of your business for information retrieval • In a centralized filing system, record maintenance, retention, and destruction are appropriate for documents used by more than one person. Decentralized filing systems are appropriate for documents not needed by more than one person.

E-mail and freedom of information • E-mail messages, both those stored in the computer and those printed out, should not be considered private. E-mail messages may be considered public records pursuant to Michigan and federal law and may be subject to disclosure. If there is no official University business reason to keep, store, or print an e-mail message, it should be disposed of promptly.

Note • Notwithstanding the above, if you encounter a situation that has the potential of resulting claims or litigation against the University, you should retain any and all records that would support the University's position for as long as that potential exists. If you have any questions about how long to retain a record in such an instance, contact the Office of the General Counsel.

Western Michigan University Archives Records Transfer/Disposal Request Form • This Record Retention Program is an ongoing process in which records will periodically be reviewed and updated. Therefore, the form attached to the end of this document should be submitted to Business Services for any of the following reasons:

1. if any department needs to include records in this document
2. if any department needs to have their record retention periods reviewed
3. if any department needs to eliminate records not addressed in this document

Accounting

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Accounting & Operating Reports | P |
| Bank Statements and Reconciliation | 3 |
| Chart of Accounts | Act |
| Description of Accounting System | P |
| Final Close Entries | P |
| Financial Statements – End-of-year (Other Months Optional) | P |
| General Ledgers | 4 |
| Journal Entries | |

*Act = while active, employed, or enrolled; Life= life of affected employee; P= permanent

Accounts Payable

| Document Name | Retention Period In years* |
|---|-------------------------------|
| Accounts Payable Ledgers | 4 |
| Expense Reports | Act + 3 |
| Check Registers | 4 |
| Correspondence (routine) with Customers and Vendors | 1 |
| Insurance Payments | 4 |
| Invoices | Act + 3 |
| Payment Disbursement Records | 4 |
| Petty Cash Vouchers | Act + 3 |
| Royalty Payments | Act + 3 |
| Independent Contractor Contracts | 4 |
| 1099's | 4 |

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Accounts Receivable and Cashiering

| Document Name | Retention Period In years* |
|---|-------------------------------|
| Accounts Receivable | 4 |
| Accounts Receivable Ledgers | 4 |
| Collection Records | Act |
| Correspondence (routine) with Customers and Vendors | 1 |
| Duplicate Deposit Slips, Cashiering Receipts | 3 |
| Invoices | 3 |
| Trial Balances | 7 |
| Uncollected Accounts | 4 |

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Admissions

| Document Name | Retention Period In years* |
|---|--------------------------------|
| Acceptance Letters (students who do not enter) | 2 years after application term |
| Applications(students who do not enter) | 2 years after application term |
| Applicant Statistics(students who do not enter) | P |
| Correspondence(students who do not enter) | 2 years after application term |
| Transcripts(students who do not enter) | 2 years after application term |
| Exams (ACT, SAT(students who do not enter | 2 |

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Affirmative Action

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Applicant Flow Report | 1 year (plus current year) |
| EEO-6 Reports | 3 |
| Probationary Status Minority C/Ts Report | 2 |

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Associate Vice President for Business and Finance

| Document Name | Retention Period In years* |
|---|-------------------------------|
| Contracts & Leases (Current – Other Than Research) | P |
| Contracts & Leases (Expired – Other Than Research) | 4 |
| Form 990 | 3 |
| Form 990-T | 3 |
| Tax Returns & Property Worksheets, Revenue Agents' Reports, and Documents Relating to Determination of Tax Liability | P |
| Residency Applications | 4 |

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Audio Production Services

| Document Name | Retention Period In years* |
|---------------|-------------------------------|
| Videotapes | 3 |

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Board of Trustees

| Document Name | Retention Period In years* |
|---------------------------|----------------------------|
| Articles of Incorporation | P |
| By-laws | P |
| Policy Statements | Act |

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Budget Office

| Document Name | Retention Period In years* |
|--|----------------------------|
| Budget Adjustments - Permanent | P |
| Budget Adjustments - One-time | 2 |
| Position Authorizations - UCCS | P |
| Position Authorizations - Faculty | P |
| Booking Budgets/Personnel Listings (All Funds) | P |
| Payroll Reimbursements – Grants and Contracts | 4 |
| Budget Request | 4 |
| Cost-Study Analysis | 4 |

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Business Services

| Document Name | Retention Period In years* |
|--------------------------------|----------------------------|
| Insurance Policies and Records | P |
| Insurance Claims | 7 |

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Campus Planning

| Document Name | Retention Period In years* |
|--------------------------|----------------------------|
| Project Planning Records | 10 |

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Collective Bargaining and Contract Administration

| Document Name | Retention Period In years* |
|--|----------------------------|
| Faculty & Staff - Grievance Records | P |
| Faculty & Staff - Arbitration Records | P |
| Faculty & Staff - Past Negotiation Records | P |

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Development Office/WMU Foundation

| Document Name | Retention Period In years* |
|---|---|
| Files on Contributors to the University | Lifetime Cumulative + 10 years detail |

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Dean of Students/Vice President for Student Affairs

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Committee to Review the President's Statement On Racial and Ethnic Harmony | 2-3 |
| Search Committee Files | 2-3 |

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EduCABLE

| Document Name | Retention Period In years* |
|--|-------------------------------|
| TV Networks | 1 |
| Bulletin Board Announcement Forms | 1 |
| Monthly Reports | P |
| Public File on "Must Carry Retransmission Consent Forms" with Broadcast Stations | P |

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Employee Assistance Program

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Files on Anyone Who Uses This Service_ | 1 |

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Financial Aid

| Document Name | Retention Period In years* |
|---------------------------|-------------------------------|
| Applications | 5 |
| Financial Aid Awards | 5 |
| Lender's Name and Address | 5 |
| Job Placement | 5 |
| Repayment History | 5 |

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General Counsel

| Document Name | Retention Period In years* |
|-------------------------------------|----------------------------|
| Attorney Opinion Letters (Property) | Act + 4 |
| Charter | P |
| Claims | Act |
| Court Documents and Records | Act |
| Deposition Transcripts | Act |
| Discovery Materials | Act |
| FOI Requests | P |
| Litigation Files | Act + 2 |

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Graduate College

| Document Name | Retention Period In years* |
|--|----------------------------|
| Information on Master's Theses, Specialist Projects, and Doctoral Dissertations Completed | P |
| Cumulative List of Doctorates Awarded by WMU (Divided by Program) | P |
| Approved Graduate Faculty Forms for All Faculty | 5 |
| Signed Request Forms, Accompanying Curricular Proposals for All Graduate Courses, Graduate Course Changes, Graduate Programs, Graduate Program Changes | P |
| Appointment Forms For All Graduate Students With Assistantship or Fellowship Appointments | 2 + current |
| General, But Inclusive, Database On Graduate Students on Appointment | 2 + current |

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Grants and Contracts

| Document Name | Retention Period In years* |
|---|----------------------------|
| Grants and Contracts | Act + 3 |
| If the University's period for retaining records is less than the required period of a grant or contract, it is the responsibility of the department to retain pertinent documentation on individual projects. Specific contract or grant regulations should be followed if the requirement is more than 3 years. | |
| The Grants & Contracts Office is responsible for retaining (1) the official contract files, including the original award and any amendments, required sponsor approvals, and subcontracts; and (2) the official accounting records, including financial transactions, reports, and invoices. | |
| In the event that any litigation, claim, or audit is started before the end of the specified retention period, the documentation must be retained until all issues have been resolved. | |

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Human Resources

| Document Name | Retention Period In years* |
|----------------|----------------------------|
| Advertisements | 2 |

| | |
|---|---------------------------------|
| AFSCME Monthly Activity Report | 2 |
| AFSCME Seasonal Layoff Data | 1 year (plus current year) |
| AFSCME Seniority Reports | 1 year (plus current year) |
| Annual Report | 2 |
| Applicant Flow Log | 1 |
| Apprenticeship Documents (duration of apprenticeship) | 4 |
| Bid Sheets | |
| Position Activity Record | |
| Requisition | |
| Testing Results | |
| Bid Sheets | 2 years (plus current year) |
| CCH Information | 2 years (plus current month) |
| Background Investigations | Act + 1 |
| Employment Applications/ Employment Listings | |
| Job Announcements and Advertisements | 1 |
| Individual Applicants Who are not Hired | |
| Background Investigation Results | 2 |
| Employment Applications/ Resumés | 2 |
| Employee File After Termination | P |
| Exit Interview Report | 2 |
| Employee Files | |
| Appointment & Transaction Forms | P |
| Beneficiary Designation | P |
| Benefit & Retirement Plan Elective Forms | P |
| Benefit Documents | P |
| Court Ordered Service Documents | P |
| Disciplinary Warnings & Actions/ AFSCME Reprimands | P |
| Emergency Contacts | P |
| Employee Accident & Injury Report | P |
| Employment Applications/ Resumés | P |
| Employee Evaluations/ Performance Appraisals | P |
| Employee Personal Information Forms | P |
| Exit Interview Checklist | P |
| Garnishment, Wages, Assignments, & Tax Levies | P |
| Layoff or Termination Notice | P |
| Letters of Appointment | P |
| Letters of Promotion, Faculty | P |
| Letters of Recommendation | P |
| Letters of Tenure, Faculty | P |
| LOA Documents | P |
| Orientation Checklist | P |
| Pay Notices | P |
| Personnel Actions | P |
| P006s | P |
| Receipt for Employee Handbook | P |
| Tuition Remission Documents | P |
| Written Verification of Employment | P |
| General Files | |
| Superseded Employee Manuals | 10 |

| | |
|--|--------------------------------|
| Superseded Job Descriptions | 10 |
| Position Activity Records | 2 years (plus current year) |
| Requisitions for Employment | 2 years (plus current year) |
| Requisition Log (formerly "Western News Log") | 2 years (plus current year) |
| Temporary, Transfer, and Unfilled Requisitions | 2 years (plus current year) |
| Western News Memos | 1 |

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Intercollegiate Athletics

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Expired Licenses | 6 |
| Financial Aid | 6 |
| Institutional Recruiting Documentation | 6 |
| Licenses & Permits | P |
| Playing/Practice Season Documentation | 6 |
| Student Athlete Registration Forms | 6 |
| Summer Camps/Clinics Documentation | 6 |
| Trademark Registrations | P |
| Other NCAA Documents | 6 |

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Internal Audit

| Document Name | Retention Period In years* |
|-------------------------------------|-------------------------------|
| Audit Reports of Public Accountants | P |
| Internal Audit Reports | P |
| Internal Audit Working Papers | 7 |

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Lawson Ice Arena Office

| Document Name | Retention Period In years* |
|----------------|-------------------------------|
| Rental Records | 4 |
| Schedules | 4 |

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Lee Honors College

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Files of Students Who Are Denied | 2 |
| Files of Students Who Graduate From the Honors College | P |

| | |
|------------------------------------|-------------------------------------|
| Advising Forms -Lee Honors College | 5 years after the student graduates |
| Advising Forms - General College | 5 years after the student graduates |
| Awards for Travel and Research | 5 |

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Miller Auditorium

| Document Name | Retention Period In years* |
|--------------------------------------|----------------------------|
| Box Office Reports/Performance Files | 7 |

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Office of Endowment/Investment Management

| Document Name | Retention Period In years* |
|--|----------------------------|
| Capital Stock & Bond Records (Ledgers, Transfer Registers) | 3 |
| Donor Declaration of Intention | P |
| Life Income and Annuity Agreement | Act |

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Office of Planning and Institutional Research

| Document Name | Retention Period In years* |
|---|----------------------------|
| Analytical Studies Committee (notes, reports) | 5 |
| College Data Exchange (data sharing agreement among Michigan colleges and universities) | 5 |
| Cost Study Database (electronic) | 5 |
| Data Sharing – Michigan Enrollments By County | 5 |
| Faculty Database (electronic files) | 5 |
| Grade Statistics | P |
| High School Reporting (as required by the state of Michigan) | 5 |
| IPEDS (WMU reports to IPEDS) | 5 |
| Presidents Council, State Universities of Michigan Reports (tuition and fees, enrollment) | 5 |
| Responses to Guide Book Surveys | 5 |
| University Fact Book | 25 |

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Ombudsperson

| Document Name | Retention Period In years* |
|---------------|----------------------------|
| Case Sheets | 2 |

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Payroll

| Document Name | Retention Period In years* |
|--|--|
| Employee Time Sheets/Time Cards | 3 |
| Employment Tax Returns | 7 |
| Garnishments | Act |
| Payroll Deductions | Act or 3 |
| Payroll Journals Summary for Calendar Year | 7 |
| W-4 Form | Act or 3 |
| W-2 Form | Act or 3 |
| I-9 Form | 3 yrs after date of hire OR 1 yr after the date of employment ends, whichever is later |

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Physical Plant/Campus Facility Development

| Document Name | Retention Period In years* |
|---------------------------------|-----------------------------------|
| Automobile Logs | 4 |
| Blueprints & Plans | P |
| Building Permits | Act + 1 |
| Building Plans & Specifications | P |
| Laboratory Practices | Act |
| Maintenance Records | Act |
| Motor Vehicle Records | Act + 1 |
| Office Layouts | Act |
| Zoning Permits | Act |
| Work Orders | 4 |
| Project Related Files | 4 years after the completion date |

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Plant Accounting

| Document Name | Retention Period In years* |
|------------------------------|-------------------------------|
| Depreciation Schedules | 4 |
| Equipment Inventory | Act |
| Mortgage Records | 4 |
| Physical Inventory Tags | 3 |
| Property Improvement Records | 4 |
| Property Records/Inventory | 4 |
| Sales | 4 |

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Provost's Office/Vice President for Academic Affairs

| Document Name | Retention Period In years* |
|--------------------------------------|----------------------------|
| Faculty Correspondence | P |
| Faculty Course Evaluation Forms | P |
| Faculty Committee Evaluation Reports | P |
| Faculty Peer Review Documents | P |
| Faculty Scholastic Achievement | P |
| Faculty Tenure Records | P |

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Public Safety/Environmental Safety and Emergency Management

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Accident Reports | 7 |
| Air or Water Waste Emissions | 3 |
| Annual PCB Log | 3 years past disposal |
| Asbestos Training Records | 1 past last day of employment |
| Audiometric Exams | Duration of employment |
| Bloodborne Pathogen Training Records | 3 years past training |
| Campus Crime Reports (Annual) | P |
| Campus Crime Reports (Interim) | 2 |
| Clean-up Records for PCB Spills | 5 |
| Confined Space Entry Permits | 1 |
| Crane Inspection Reports | 2 |
| Employee Exposure Records | Act + 30 |
| Employee Medical Complaints | Act + 30 |
| Hazardous Chemical Waste Records | 3 |
| Inorganic/Arsenic/Lead/ Acrylonitrile Medical and Exposure Records of employment | 40 years or 20+ years |
| Laboratory Practices | Act |
| Manlift Inspection Logs | Act |
| Mechanical Power Press Inspection Records | Last 2 inspections |
| PCB Transfer Maintenance Records | 3 years after ceasing use |
| Personal Protective Equipment Hazard Assessment and Training Logs | Act |
| Radiation Disposal Records, Monitoring Records, Radiation Survey Records | P |
| Sling Testing Reports | Act |
| Traffic Accident Reports | P |

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Purchasing

| Document Name | Retention Period In years* |
|--|----------------------------|
| Correspondence (routine) with Customers and Vendors | 1 |
| Purchase Orders (Purchasing/Receiving/University Stores) | 4 |
| Purchase Requisitions | 2 |
| Receiving Documents | 4 |
| Vendor Bidding Documents | 4 |
| Postal Records | 4 |
| Delivery Unit Records | 2 |
| University Stores Requisitions (customer supply orders) | 4 |

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Registrar/Records

| Document Name | Retention Period In years* |
|---|---|
| Acceptance Letters | 7 years after date of last attendance |
| Academic Records | P |
| Advanced Placement | 7 years after date of last attendance |
| Applications | 7 years after date of last attendance |
| Application for Graduation | 7 years after date of last attendance |
| Class Schedules | P |
| Correspondence | 7 years after date of last attendance |
| Course Drop/Add Slips | 3 |
| Date of Graduation and Degree Award | P |
| Degree Audit Records | 7 years after date of last attendance |
| Degree Statistics | P |
| Disciplinary Files | 7 |
| Enrollment Statistics | P |
| Entrance Exams & Placement Scores | 7 years after date of last attendance |
| Family Educational Rights and Privacy Act | Life |
| Graduate Student Records Folders | Act & Inactive for 2 years |
| Letters of Recommendation | 7 |
| Name Change Authorizations | 7 years after date of last attendance |
| Personal Data Forms | 1 year after date of last attendance |
| Racial/Ethnic Statistics | P |
| Transcript Requests | 1 |
| Transfer Credit Evaluations | Permanent if accepted/ Destroy if not accepted |

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Residence Hall

| Document Name | Retention Period In years* |
|------------------------------|-------------------------------|
| Residence Hall Student Files | 3 |
| Contract Cards | 3 |

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Secretary of the Board of Trustees

| Document Name | Retention Period In years* |
|---|-------------------------------|
| Minutes of Board of Trustees Meetings | P |
| Minutes of Board of Trustees Committee Meetings | P |

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Sindicuse Health Center

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Medical Records | 7 years after last visit |
| Pre-Employment Physicals of Applicants Not Hired | 7 years after last visit |
| Pre-Employment Testing | 30 |
| Workers' Compensation Records | 30 |

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Student Employment Referral Service

| Document Name | Retention Period In years* |
|---|---|
| Evaluations | 3 |
| Applications for Student Positions, Hired | 7 years after termination of employment |
| Applications for Student Positions, Not Hired | 2 |
| Copies of Payroll Card | 1 |
| Staff I-9's (kept by hiring department) | 3 years after date of hire or 1 year after the date employment ends |
| Payrolls (for Audits, Employment Verifications) | 3 |
| Automatic Interest | 3 |
| Resumés for Interns | 1 |
| Over-Hours List | 3 |
| Non-enrolled List | 3 |
| Students Sheets for CWS | 3-5 |
| Off-campus Contracts | 3 |

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Student Life

| Document Name | Retention Period In years* |
|--|-------------------------------|
| Keystone Leadership Documents | 3 |
| Registered Student Organizations | P |
| Sponsored Events – Bronco Bash, For Freshmen Only Homecoming | 3 |
| WIDR | P |

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Telecommunications

| Document Name | Retention Period In years* |
|------------------------|-------------------------------|
| Financial Reports | 4 |
| Student Billing Totals | 4 |
| Student Transactions | 4 |

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Unified Clinics

| Document Name | Retention Period In years* |
|-----------------------------------|-------------------------------|
| University Substance Abuse Clinic | 7 |
| Speech and Audiology | 3 |
| Occupational Therapy Records | 7 |
| Vision Testing Records | 10 |

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University Bookstore

| Document Name | Retention Period In years* |
|----------------------|-------------------------------|
| Purchase of Products | 7-8 |
| Cash Register Tapes | 1-2 months |
| Student Records | 4 |

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University Counseling and Testing Center

| Document Name | Retention Period In years* |
|-----------------------------|---|
| Clinical Counseling Records | 7 years from last date of service |
| Test Results Data | 2 years from date of administration |

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University Libraries

| Document Name | Retention Period In years* |
|---|-------------------------------|
| Archives & Regional History Accession Records, Correspondence, Staff Minutes, Sign-In, Phone Logs, Returned Loan Items, Personnel Files | P |
| Circulation Statistics (# of items checked in/out) | P |
| Daily Record of Overdue Fines Paid Per Day | P |
| Entry/Exit Gate Count | P |
| IPEDS Statistics, Library Associations Statistics | P |
| Number of Items Shelved, In-House Usage, Periodicals, Books | P |

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University Recreation Programs and Facilities

| Document Name | Retention Period In years* |
|------------------|-------------------------------|
| Rental Contracts | 4 |
| Membership Forms | 4 |

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University Substance Abuse Services

| Document Name | Retention Period In years* |
|------------------------------------|-----------------------------------|
| Substance Abuse Counseling Records | 2 years from last date of service |

*Act = while active, employed, or enrolled; Life= life of affected employee; P= permanent

Vice President for Research

| | |
|---|--|
| Copyrights | P |
| Licenses and Permits | P |
| Patent & Trademark Records | Act + 6 |
| Royalty Records | 7 |
| Trademark Registrations | P |
| Investigator Significant Financial Disclosure | Act + 4 |
| Allegations of Scientific Misconduct | 3 years after completion of the case |
| Human Subjects Institutional Review Board | 3 years from expiration of protocol approval |
| Institutional Animal Care and Use Committee | 3 years from expiration of protocol approval |
| Institutional Biosafety Committee | 3 years from expiration of protocol approval |

*Act = while active, employed, or enrolled; Life= life of affected employee; P= permanent

Date: _____

WESTERN MICHIGAN UNIVERSITY ARCHIVES
RECORDS TRANSFER/DISPOSAL REQUEST

Submit this form to the Archives and retain a copy for your files.

_____ REQUESTS THAT THE FOLLOWING RECORDS BE:
(Department or Office)

- A. Destroyed
- B. Retained at the discretion of the University Archivist
- C. Retained for _____ years within the Departmental File
- D. Retained permanently

(Signature of Department Head/Director)

Please list or describe records and inclusive dates below:

(Attach additional sheets if necessary)

Approved:

(Director, Archives and Regional History Collections) (Date)

(Manager, Business Services) (Date)
