Purpose

The purpose of this procedure includes the following:

- To establish uniform retention and disposition practices for records and documents for the entire college system.
- To ensure that necessary records and documents are adequately protected and retained for sufficient periods of time to meet administrative, audit, legal and historical needs.
- To promote cost effective and efficient management of records and information.
- To provide MATC departments with the legal authorization to dispose of records on a routine basis in accordance with MATC's Records Retention Schedule.

Scope

This procedure applies to all departments and administrative offices of MATC, to all records of the college, and to all officers and employees who create, receive or maintain records as part of their work on behalf of MATC.

“Record” is defined to include any document needed to continue the operations of MATC. It could be a document regarding legal status or obligation, financial status or obligation, or a document necessary to fulfill obligations to employees, students, and clients. “Record” does not include drafts, notes or preliminary documents.

In addition to paper documents, electronic media such as computer printouts, microfilm, microfiche, magnetic tapes, digitized optically scanned information, maps, charts, photographs, films, tape recordings, and electronic records can also be considered “records.” Electronic records must be incorporated into the college’s recordkeeping requirements in order to have an accurate and complete record of its activities. In order to educate and train those responsible for maintaining records in accordance with the Records Retention Schedule, the Office of General Counsel and Information Technology Division will develop and provide informational and educational training containing practical guidance on issues surrounding electronic records management so that departments are able to meet their recordkeeping obligations.

Administration

The Office of the General Counsel oversees the retention and disposal of MATC’s records and is responsible for the following:
a. Publish a Record Retention Schedule that is in compliance with local, state and federal laws;

b. Monitor local, state and federal law affecting record retention;

c. In conjunction with department heads, annually review and modify as necessary the Record Retention Schedule;

d. Obtain approval of all modifications to the Records Retention Schedule from the Wisconsin Public Records Board and/or the Wisconsin State Historical Society, as required by state statute;

e. Develop a training program for personnel responsible for record storage and maintenance; and

f. Monitor all departments for compliance with the Record Retention Schedule.

Each department head will prepare a listing of documentation used and maintained by the department and will compare it to the documents listed in the Record Retention Schedule. In addition, each department head will annually review currently-used records and forms to determine whether these records and forms are subject to the retention requirements, and will designate an individual(s) responsible for monitoring record retention, storage and disposal.

Each department head will annually review the Records Retention Schedule applicable to their area of control to determine any special circumstances that necessitate changes in the retention periods. Requests for changes in retention periods or deviations from specified retention periods should be made to the Office of the General Counsel, and may be implemented only after approval by the Office of General Counsel.

In the event of a governmental audit, investigation, or pending or threatened litigation, record destruction may be suspended at the direction of the Office of the General Counsel. In addition, the Office of the General Counsel should be informed of any situation that might give rise to legal action as soon as the situation becomes apparent.

**Using the Records Retention Schedule**

The Records Retention Schedule establishes minimum retention periods for each record series or data type. The Schedule is subject to revision by the Office of Special Counsel. If the Schedule is revised, the Office of Special Counsel will provide each department head with the revised Schedule and effective date of same.
It is recommended that following the completion of the retention period stated in the Schedule, the document or file be destroyed unless transfer to permanent storage is specifically required by the Schedule. However, if a department has a continuing need for the item, it may be retained longer within that department. If a document is retained longer than required by the Schedule, the Office of General Counsel should be notified.

The Records Retention Schedule applies to all records regardless of their format or media, including all types of records maintained in electronic formats. Any record not covered by this Procedure, Records Retention Schedule, or other regulation or law shall be retained for seven years.

Those responsible for maintaining records in their respective area should use the Records Retention Schedule as a guide in creating and organizing filing systems, to plan for space and equipment needs and to ensure that only necessary documents are created and/or retained.

**Destruction of Records**

Destruction of records prior to the retention period set out in the Records Retention Schedule is prohibited. All recommended destruction of records stated within the Records Retention Schedule should be carried out by the department head or designee. At least 30 days prior to destruction of records, the department head or designee should notify the Office of General Counsel of the destruction by submitting a Destruction of Records Form describing the document(s) to be destroyed.

Destruction should be carried out periodically (generally at least once a year). To facilitate orderly destruction of paper records, assigned staff should review filing arrangements, cut off files periodically, and develop procedures for organization and storage of documents that will aid in timely disposal of records as set forth in the Records Retention Schedule.

Doubt concerning whether to retain or destroy a record should be resolved in favor of preservation.

With regard the Records Retention Schedule, the following exceptions apply:

**Public Records Request.** If a public records request has been made with a department for any item or items contained in the Records Retention Schedule, the Public Records Law (Wis. Stat. §19.35(5)) forbids the destruction of any record until the request is granted or until at least sixty (60) days after the date that the request was denied. Court orders may extend this time period. As set forth in MATC Policy A0109, all public records requests should be forwarded to the appropriate office for processing. Any
document subject to a Public Records Request cannot be destroyed without advanced approval from the Office of General Counsel.

Pending Litigation or Audit. It is the department’s responsibility to determine if an audit, threatened litigation or pending litigation will involve any records listed in the Records Retention Schedule, and to suspend any destruction until such time as the audit or litigation is completed. As set forth in the “Litigation Hold” section of this procedure, there may be documents not specifically listed in the Records Retention Schedule or not considered official records that may also be subject to a hold on destruction. Any document subject to an audit, threatened litigation or pending litigation, or “litigation hold” cannot be destroyed without advanced approval from the Office of General Counsel.

Duplicates. Duplicates may be destroyed when their administrative usefulness has ceased. A separate records schedule and Destruction of Records Form is not required to dispose of duplicates.

Destruction of Record Containing Personal Information. Records containing personally identifiable information (i.e., information that can be associated with a particular individual through one or more identifier, such a social security numbers, or other information or circumstances, medical records of individuals or other personnel related records) must be destroyed by shredding or some other confidential means approved by the Office of General Counsel.

Electronic Records

The Records Retention Schedule applies to electronic records, including electronic mail (e-mail). Retention periods should be based on the content within the record, not on media type or storage limitations. Not all e-mails are “records” subject to this Procedure. Non-records include e-mail records which are unrelated to MATC, MATC’s statutory obligations, or MATC’s operations. For example, unsolicited and junk e-mails not related to the College’s work or personal non-work related e-mails received by MATC employees are not records subject to this Procedure.

Appropriate IT staff should develop and implement procedures for effective management and purging of electronic records on a regular basis. Disposition of electronic records can include downloading them to off–line storage media and eventual deletion or erasure. Absent a specified retention period outlined in the attached Record Retention Schedule, electronic records, including e-mail records should be retained for seven (7) years.
**Litigation Hold**

Any records listed in the Records Retention Schedule which are related to or involve threatened litigation or pending litigation may not be destroyed until such time as the litigation is resolved. This may require retention beyond the period set forth in the Records Retention Schedule.

A litigation hold may apply to any documents within the possession of MATC and its employees, including drafts, notes or preliminary documents that are not considered “records” subject to the Records Retention Schedule. Even documents not considered “records” may be relevant to pending or threatened litigation and, therefore, subject to a hold on destruction until the time such litigation is resolved.

MATC has adopted the following college-wide records retention schedule to provide guidance to its various departments and divisions on the creation, maintenance and destruction of necessary documents in order to ensure compliance with all applicable laws and regulations, and to ensure the college’s legal and audit standing is maintained.

**Retention Periods Defined**

- **ACT** = While active, employed or enrolled.
- **LIFE** = Life of affected employee.
- **PERM** = Permanent retention.

**Schedules by Category**

**ADMINISTRATION AND GENERAL LEGAL RECORDS**

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Directors Meeting Minutes</td>
<td>PERM</td>
</tr>
<tr>
<td>Board of Directors Committee Meeting Minutes</td>
<td>PERM</td>
</tr>
<tr>
<td>Annual Reports to the Board of Directors</td>
<td>7 years</td>
</tr>
<tr>
<td>Board Policies and Procedures</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Board of Directors Correspondence</td>
<td>7 years</td>
</tr>
<tr>
<td>Legal Opinions</td>
<td>7 years</td>
</tr>
<tr>
<td>Notice of Meetings</td>
<td>7 years</td>
</tr>
<tr>
<td>Newsletter/Bulletins</td>
<td>7 years</td>
</tr>
<tr>
<td>Special Project Studies/Reports</td>
<td>7 years</td>
</tr>
<tr>
<td>Long Range Planning Reports</td>
<td>7 years</td>
</tr>
<tr>
<td>Management Correspondence/Memos</td>
<td>7 years</td>
</tr>
<tr>
<td>Title: RECORDS RETENTION</td>
<td>Code: AA0109</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>Deeds and Titles</td>
<td>PERM</td>
</tr>
<tr>
<td>Contracts</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Patent, Copyright and Trademark Records</td>
<td>PERM</td>
</tr>
<tr>
<td>General Correspondence not otherwise covered in schedule</td>
<td>7 years</td>
</tr>
</tbody>
</table>

**ADMISSION AND FINANCIAL AID**

**APPLICATION MATERIALS FOR STUDENTS WHO ENTER**

| Acceptance Letters | 7 years after date of last attendance |
| Applications | 7 years after date of last attendance |
| Correspondence | 7 years after date of last attendance |
| Entrance Exams and Placement Scores | 7 years after date of last attendance |
| Letters of Recommendations | 7 years |

**APPLICATION MATERIALS FOR STUDENTS WHO ARE ACCEPTED BUT DO NOT ENTER**

| Acceptance Letters | 7 years after application term |
| Applications | 7 years after application term |
| Correspondence | 7 years after application term |
| Individual Complaint or Problem | 7 years after last entry |
| Summary Record for Individual Complaint | PERM |
| Transcripts | 7 years after application term |

**FINANCIAL AID RECORDS**

| Applications | 7 years |
| Financial Aid Awards | ACT + 7 years |
| Financial Aid Transcripts | 7 years |
| Job Placement | ACT + 7 years |
| Lender's Name and Address | ACT + 7 years |
| Other documents in Financial Aid Files | ACT + 7 years |
| Promissory Notes | PERM |
| Repayment History | ACT + 7 years |
| Summary Statistical Reports | PERM |

**PROVOST**

**REGISTRAR**

| Individual Student Records: |
| Academic Records | PERM |
| Advanced Placement | PERM |
| Application for Graduation | PERM |
| Course Catalogs | |
| Class Rolls | PERM |
| Diplomas Not Picked up by Students | PERM |
FERPA Requests  PERM
Independent Study Forms  PERM
Pass/Fail Requests  PERM
Personal Data Forms  PERM
Registration Forms  PERM
Transcript Requests  PERM
Date of Graduation and Degree Award  PERM
Degree Audit Records  PERM
Transfer Credit Evaluations  PERM
Name Change Authorizations  PERM
Withdrawal Form  PERM

General Student Records:
Applicant Statistics  PERM
Class Schedule  PERM
Degree Statistics  PERM
Enrollment Statistics  PERM
Grade Statistics  PERM
Racial/Ethnic Statistics  PERM

Academic Affairs:
Course Syllabi  7 years
Commencement Program  PERM
Curriculum Development (Course Worksheet, Evaluations and Recommendations)  7 years
Faculty Evaluations  7 years

HUMAN RESOURCES
Employment Applications/Employment Listings:
Applications of those not hired  7 years
Applications of those who hired  7 years after date of termination
 Applicant Flow Data  7 year
Job Postings and Advertisements  7 years after date of recruitment
Requisition for Personnel  7 years after job is filled or requisition cancelled.

Unsolicited Resumes, General Expressions of Interest  7 years
Background Investigation Results  7 years

Individual Employee/Medical Files:
(containing the following documents)  ACT + 7 years after termination
Attendance Records
Beneficiary Designation
Criminal Background Reports
Employment Contracts
Disciplinary Warnings and Actions
Emergency Contacts
Employee Evaluations
Employment Application/Resume
Employment History Data
Layoff/Recall Notice
Termination/Resignation Notice
Medical Records
Personnel Actions
Promotion
Transfer

Employee Health and Safety:
   Accident Reports    7 years after settlement or conclusion.
   Worker’s Compensation Claims 7 years after settlement or conclusion

Settlements
   Injury Frequency Charts PERM
   Employee Exposure Records (OSHA) 30 years after termination
   Employee Medical Records 30 years after termination
   Safety Records 7 years
   Health and Safety Bulletins Until superseded + 7 years

Labor Relations Matters:
   Arbitration Decisions PERM
   Grievance Files 7 years from date of filing
   Labor Union - Contracts PERM
   Labor Union – Disputes PERM
   Labor Union – Negotiation Minutes PERM

Compensation and Benefits:

Contracts/Claims:
   General Liability Claims 7 years after settlement or conclusion

Pension and Benefits Records:
   Actuarial Records 7 years
   Education Assistance LIFE
   Disability Records LIFE
Incentive Plans (after expiration)  7 years
Individual Employee Files  LIFE
Pension Plan (after expiration)  7 years
Retirement Benefits Accrued  LIFE
Retirement Plans (after expiration)  7 years
Sick Leave Benefits  LIFE
Vesting  LIFE
401K Benefits Accrued  LIFE

BUSINESS OFFICE
Payroll Records:
Cost of Living Tables  7 years
Garnishments  ACT + 7 years
IRS Form W-2  7 years
IRS Form W-4  7 years
IRS Form 941  PERM
Payroll Deductions  7 years
Salary or Current Rate of Pay  7 years
Time Cards or Sheets  7 years
Wage Rate Tables  7 years
Wage or Salary History  7 years
Payroll Registers  7 years

Accounts Receivable Records:
Accounts Receivable  7 years
Accounts Receivable Ledgers  7 years
Collection Records  ACT + 7 years
Receipts  7 years
Uncollected Accounts  7 years
1098T Tax Forms  7 years
1098E Tax Forms  7 years

Account Payable Records:
Accounts Payable Ledgers  7 years
Expense Reports  7 years
Invoices  7 years
Payment/Disbursement Records  7 years
Purchase Requisitions/Work Orders  7 years

Financial Records:
Annual Budget Detailed Work papers  7 years
## RECORDS RETENTION

### Auditor's Reports
- PERM

### Audit Work papers
- 7 years

### Bank Deposit Records
- 7 years

### Bank Statements and Cancelled Checks
- 7 years

### Budget Adjustment Forms
- 7 years

### Budget Committee Minutes
- PERM

### Endowment Custodian Reports
- 7 years

### General Ledger Journal Entry Forms
- 7 years

### General Ledger Summary Account Balance
- PERM

### General Ledger Transaction Detail
- 7 years

### Gift Annuity Contracts
- PERM

### Grant Proposal (unsuccessful)
- 7 years

### Grant Proposal (successful)
- ACT + 7 years

### Monthly Financial Reports
- 7 years

### Two-Page Budget Summary
- PERM

### Trust Documents
- PERM

### Unclaimed Property Reports
- 7 years

### Wills and Estate Documents
- PERM

### Federal Tax Records:

#### IRS Form 990
- PERM

#### IRS Form 990-Detailed Supporting Working Papers
- 7 years

#### IRS Form 990-T
- PERM

#### IRS Form 990-T-Detailed Supporting Working Papers
- 7 years

#### IRS Form 1099Misc, 1099R, 1099E
- 7 years

### Loan Documents:

#### Promissory Notes-Paid in full or Cancelled Transaction Journals
- ACT + 7 years

### Litigation Documents:

#### Claims
- ACT + 10 years

#### Court Documents and Records
- ACT + 10 years

#### Deposition Transcripts
- ACT + 10 years

#### Discovery Materials
- ACT + 10 years

#### Litigation Files
- ACT + 10 years

### PHYSICAL PLANT

#### Facilities Records:
<table>
<thead>
<tr>
<th>Category</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air or Water Waste Emissions</td>
<td>7 years</td>
</tr>
<tr>
<td>Building Permits</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Building Plans and Specifications</td>
<td>PERM</td>
</tr>
<tr>
<td>Hazardous Chemical Waste Records</td>
<td>7 years</td>
</tr>
<tr>
<td>Laboratory Practices</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Maintenance Records</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Motor Vehicle Records</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Office Layouts</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Operating Permits</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Zoning Permits</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Capital Property Records:</td>
<td></td>
</tr>
<tr>
<td>Blueprints</td>
<td>PERM</td>
</tr>
<tr>
<td>Equipment Inventory</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Depreciation Schedules</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Mortgage Records</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Property Improvement Records</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Property Records/Inventory</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Sales</td>
<td>7 years</td>
</tr>
<tr>
<td>Insurance:</td>
<td></td>
</tr>
<tr>
<td>Fire Inspection Reports</td>
<td>7 years</td>
</tr>
<tr>
<td>Insurance Claim Working Papers</td>
<td>10 years after settlement</td>
</tr>
<tr>
<td>Insurance Policies</td>
<td>PERM</td>
</tr>
</tbody>
</table>

**ADVANCEMENT**

**INSITUTIONAL PUBLICATIONS**

<table>
<thead>
<tr>
<th>Category</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alumni Directories</td>
<td>7 years</td>
</tr>
<tr>
<td>Alumni Newsletters</td>
<td>7 years</td>
</tr>
<tr>
<td>College Press Publication List</td>
<td>7 years</td>
</tr>
<tr>
<td>Bulletins and course Catalogs</td>
<td>7 years</td>
</tr>
<tr>
<td>Donor Intent/Pledge Forms ($10,000 &amp; up)</td>
<td>ACT + 7 years</td>
</tr>
<tr>
<td>Endowed Fund Agreements</td>
<td>PERM</td>
</tr>
<tr>
<td>Employee Directories</td>
<td>7 years</td>
</tr>
<tr>
<td>Institutional Newspapers/Newsletters</td>
<td>7 years</td>
</tr>
<tr>
<td>Student Directories</td>
<td>7 years</td>
</tr>
<tr>
<td>Student Newspapers</td>
<td>7 years</td>
</tr>
</tbody>
</table>

**STUDENT SERVICES**

**CAREER SERVICES**

<table>
<thead>
<tr>
<th>Category</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report to VP</td>
<td>7 years</td>
</tr>
<tr>
<td>Graduate Survey Records</td>
<td>PERM</td>
</tr>
</tbody>
</table>
Student Career Planning Records  ACT + 7 years
Teacher Credential Records  PERM

COUNSELING SERVICES
Counseling Records  ACT + 7 years

HEALTH SERVICES
Health Records  ACT + 7 years
Vaccination Records (other than flu vaccines)  PERM

STUDENT ACTIVITIES
Committee Files  7 years
Student Organization Budgets  ACT + 7 years
Student Organization Constitutions  ACT + 7 years
Program Files  7 years
Letters of Recommendation  PERM
Student Publications (1 copy)  PERM
Orientation Guides (1 copy)  7 years
Publications  7 years
Event Forms  ACT + 7 years

INTRAMURAL AND RECREATIONAL ACTIVITIES
Letters of Recommendation  PERM
Accident Reports  7 years
Participant Liability Waivers  PERM
Disciplinary Files  ACT + 7 years
Committee Files  7 years
Program Files  7 years

Office Of Responsibility: Office Of The General Counsel