



Northern Marianas College Procedure

Procedure No.: 9008.1 Procedure Title: Records Management
Issuing Date: 7.30.12 Adoption Date: Effective Date: 2/6/2014
Office of Origin: Office of the Dean of Student Services
Procedure Approval Authority: President *[Signature]*
Board Policy No. associate with this procedure: None
This Procedure Supersedes/Replaces: None

The written steps necessary to appropriately and uniformly perform a task in carrying out policies and activities of the College.

Overview/procedure description

The College keeps records to ensure effective operation, accountability, and to retain essential evidence of the College's activities and transactions. This procedure outlines minimum standards for efficient and cost effective retention and control of records from creation to the date of disposal, or archiving where appropriate.

Northern Marianas College respects the privacy of its students, faculty, and staff and manages all records to safeguard privacy. The College complies with applicable laws and good business practices for the records it maintains.

More particularly, BOR Policy Nos. 4009 Access to Student Records and 4010 Student Educational Rights and Privacy provide guidance as to handling student records.

Furthermore, College Procedure No. 5010.2 guides the Human Resources Office with respect to its responsibilities regarding maintenance of personnel records and establishes restrictions on access thereto.

Areas of Responsibility

Unless otherwise specified in this procedure, the head of the division and program in which a record is created or maintained shall oversee and arrange the destruction and disposal of such records in compliance with the approved Records Retention Schedule. Any records not covered by the Records Retention Schedule are subject to review by the Dean of Student Services in consultation with the College's legal counsel.

Procedure details

Confidential Records

The following types of records are considered confidential:

- a) Education records as defined by the Family Educational Rights

and Privacy Act of 1974.

b) Individual employment records including records which concern hiring, appointment, promotion, tenure, salary, performance, termination or other circumstances of employment.

c) Records that include "protected health information" as defined by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

d) Records the use of which has been restricted by contract.

e) All administrative records of the College, with certain exceptions, such as those which must be open in conformance with law.

f) Records which might expose the College to legal liability if exposed.

Safeguards Against Unauthorized or Accidental Disclosure

Until the records are properly disposed, each Office is accountable for securing the access to and the maintenance and disposal of its records regardless of the records' format and location. Each Office is accountable for ensuring that employees, and others, are granted access to Confidential information to the extent it is essential to the performance of their duties. Furthermore, each Office must ensure that those granted access are trained and undertake reasonable safeguards to protect the Confidential information.

Records Storage and Disposition

Each Office of origin will receive, secure, and store records required for its purpose and functions in its own facility and dispose of records in accordance with the Records Retention Schedule. Student academic records will be recorded, stored, and authorized for destruction and disposed of in accordance with the Records Retention Schedule.

Maintenance and disposition of records created, retained, or stored in electronic format shall proceed on the same basis as traditional records. Unless retention is otherwise required by law, paper records that are scanned into a secure digital record format may be immediately disposed of by shredding. The resulting digital file must be maintained and updated, as necessary, by the Office to ensure retention as required by this policy. Each Office shall authorize the storage, destruction, and disposal of records under its purview based on the guidelines set forth in the Records Retention Schedule. All documents will be properly shredded prior to disposal.

Suspension of Records Retention Schedule in the Event of a Claim, Lawsuit, Government Investigation, Subpoena, Summons, or Other Ongoing Matters

Upon service of legal process (subpoena, summons or the like), or upon learning of an investigation or audit, or if a claim is made, whether formal or informal, or a dispute arises, the Record Retention Schedule shall be suspended and records related to the legal process, claim, dispute, investigation or audit should not be destroyed, pending resolution of the matter.

Extended Retention Period

Records which are retained beyond the guidelines outlined in the Records Retention Schedule will be disposed of in accordance with this policy and procedure.

Destruction Authorization

College records that have passed through the active phase of their life cycle and are no longer needed in their office of origin for the day-to-day operation of that office may be identified by office staff. When records so identified have reached the conclusion of their retention period pursuant to the Records Retention Schedule, the Office of origin or the program's division head will initiate the process for the records' destruction and disposal.

Upon reaching the prescribed timeframe as outlined in the Records Retention Schedule, or any extension thereto, the destruction of academic and admissions records so stored shall be authorized by the Director of Admissions and Records. Requests for records destruction and disposal may be initiated by the senior officer or the Dean of Student Services.

Safe and Secure Disposal

Each division head shall oversee and arrange the destruction and disposal of all records stored in their respective program offices and designated storage spaces covered in the Records Retention Schedule. All paper records covered by the Records Retention Schedule shall be destroyed by shredding or incineration. All digital records covered by the Records Retention Schedule shall be destroyed under the supervision of the Director of Information Technology.

Destruction Record

A destruction record is an inventory describing and documenting those records, in all formats, authorized for destruction, as well as the date, agent, and method of destruction. The destruction record itself shall not contain confidential information. Each office will maintain its destruction record either in paper or digital format.

Records Retention Schedule

The Records Retention Schedule in the table below is a guideline that sets forth the length of time records shall be retained. The schedule is intended to cover all College records for which there is a legal, regulatory or management retention requirement.

The Dean of Student Services should be notified of any records not covered by the Records Retention Schedule. The Dean of Student Services will determine, in consultation with the College's legal counsel, whether to destroy the records in question or add those records to the Records Retention Schedule.

Duplicate records should be destroyed and disposed of as early as practical.

More particularly to the records managed and maintained by the Human Resources Office, however, College Procedure No. 5010.2 Personnel Files states that all personnel records shall be kept for a period of seven (7) years after termination or expiration of employment.

DOCUMENT TYPE	RETENTION PERIOD
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1. Institutional Documents

1.1 Board Committees	Permanent
a. Bylaws	
b. Meeting Notices	
c. Agendas	
d. Minutes	
e. Membership Lists	
1.2 Documents concerning members of the Board of Trustees	Permanent
a. Curriculum Vitae and newspaper Articles	5 years after resignation of Board Member
b. Conflict of Interest Forms	
1.3 Charter and Amendments to Charter and Related Correspondence	Permanent
1.4 Institutional Policies and Manuals	Permanent
1.5 Mission Statement/Strategic Plans	Permanent
1.6 News Releases	Permanent
1.7 Organization Charts	Permanent

2. Financial Records

2.1 Chief Financial Officer (CFO): Financial statements, Audit reports, Copies of CFO Purchase Orders, Copies of check request for CFO, investment reports, Copies of relevant contracts	7 years
2.2 Chief Accountant records:	
a. Bank Statements, Bank Reconciliation Reports and supporting documents,	11 years after audit
b. Journal Vouchers	7 years after audit
2.3 Federal Accountant records: Federal Award Notifications, Memorandum of Agreement (MOA), Memorandum of Understanding (MOU), Program budget breakdown, Correspondence with federal grantor agencies, Federal Financial Reports, Request for reimbursement or billings, Funds Draw-down reports	7 years
2.4 Accountant III (Travel, Fixed assets, & Investment records): Original Check Vouchers, Issued Check copies and supporting documentation including invoices, check requests, and purchase order copies, Vendor Contract Copies, Travel Authorizations and supporting documents, Trip reports and supporting documents, Fixed Assets reports, Investment reports	7 years
2.5 Accounts Payable records: Original Check Vouchers, Issued Check copies and supporting documentation including invoices, check requests, and purchase order copies, Vendor Contract Copies	7 years
2.6 Accounts Receivable records: Student registration forms; Student withdrawal forms; Student Add/Drop forms, Promissory notes; Department Requests for billing, Copies of Billings; CNMI Government Purchase Orders for NMC services, Check requests for student refunds; Student statements; Correspondence relating to collection, billings, Financial Aid, Scholarship awards; Student balance reports, Army Tuition Assistance invoice history and record of payments, Americorp invoices and record of payments, Accounts Receivable reports, Bookstore charges invoice, Collection attorney reports,	10 years

Collection court judgments	
2.7 Funds Certification records: Journal Vouchers, Copies of Check Requests, Purchase orders, Travel Authorizations, Instructional/Professional Contracts and supporting documentation including encumbrance budget reports and budget revision/establishment requests.	7 years
2.8 Payroll records: a. Personnel Actions, Timesheets (Supporting documents), Check Stubs/Vouchers, Journal Vouchers, Memorandums & Updates, Payroll Fund Transfer Reports, Allotment Request, Check Requests for Payroll Vendor payables	7 years
b. Employee W2 forms	Permanent
2.9 Work-study payroll records: Personnel Actions, Timesheets (Supporting documents), Check Stubs/Vouchers, Journal Vouchers, Memorandums & Updates, Payroll Fund Transfer Reports, Allotment Request, Check Requests	7 years
2.10 Cashier records: PowerCampus and Daily Collection Reports including supporting documents such as; credit card settlement, bank deposit slips and credit card receipts. Transcript Request Forms including check payments, cash receipts (carbon copy), Armored delivery slips, Scholarship award disbursement documentation, Financial aid disbursement documentation and Vendor check log out book. Petty Cash and Change Fund Check Requests and Copies of credit card settlements.	7 years
2.11 Budget records	7 years

3. NMC Foundation Documents

3.1 Annual Donor Reports	Permanent
3.2 Annual Finance Reports	Permanent
3.3 Annual Giving Reports	Permanent
3.4 Donor Gift Deposit Records	7 years
3.5 Donor Gift File	Permanent

4. Legal Documents

4.1 Contracts and Related Correspondence	6 years after expiration or
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	termination of the contract
4.2 Settlement agreements	Permanent
4.3 Complaints and Answers	Permanent

5. Intellectual Property Documents

5.1 Copyrights (General)	3 years after expiration
5.2 Patents (Applications, Assignments, License Agreements)	6 years after expiration

6. Purchasing

6.1 Purchase Orders of Non Capitalized property	3 years from the fiscal year of issue. date of issue final disposal, however, should an action be initiated by or against the College, the relevant records shall be maintained until such action is settled
6.2 Invoices	3years from the date of payment. PPMO Note: Invoices are supplemental documents for P.O and Contract only
6.3 Contracts derived from bids, RFP files, and related correspondence	3 Years from the date of final payment made under a Contract
6.4 Fixed Assets System (FAS Gov)	Permanent

7. Real Estate

7.1 Options to Purchase Real Estate	6 years after expiration of option
7.2 Property Records for Real, Capitalized and Selected Non-Capitalized Property (Deeds, Leases, and Title Reports)	3 years after College's interest has terminated or is transferred

8. Construction Documents

8.1 Building plans, blueprints and design plans	Permanent
8.2 Contracts and agreements	3 years after the final payment made
8.3 Contracts that are subject to legal action by or against the College	The later of the above or when such action is settled
8.4 Licenses and Permits	Permanent
8.5 Management Engineering Studies and	Permanent

Reports	
8.6 Maps	Permanent

9. Risk Management/Insurance Records

9.1 Insurance Policies	6 years after expiration
9.2 Incident Reports	5 years Involving Minors: latter of 5 years or 19th birthday
9.3 Litigation	2 years after settlement or disposition of litigation

10. Medical Records

10.1 Dental Hygiene Clinic Client Charts (dental records)	Minors – latter of 7 years or 19th birthday, for current employee records kept at HRO, and permanently elsewhere, thereafter, for former employees
10.2 Health Career: Health Records (initial and update forms)	7 years for current employee records kept at HRO, and permanently elsewhere, thereafter, for former employees

11. Student Services: Student Records

11.2 Advisor/Program Change form	5 years after last enrollment
11.3 College Transcripts from other institutions	5 years after last enrollment
11.4 Final Grade Roster	Permanent
11.5 Grade Change Files	Permanent
11.6 Graduation Application	5 years after graduation
11.7 Graduation Certification (when requested)	5 years after graduation
11.8 Transfer Course Evaluation Forms	Permanent
11.9 Transcript Request Form	1 year after request form date
11.10 Drop/Add/Withdrawal Form	5 years after last enrollment
11.11 Dual Admissions Intent Form	5 years after last enrollment
11.12 Disciplinary Records	5 years after last

	enrollment
11.13 Suspension/Reinstatement letters	5 years after last enrollment
11.14 High School Transcript	5 years after last enrollment
11.15 Admissions Applications	Permanent for enrolled students; 1 year for non-enrolled students
11.16 Web Application Signature Page	5 years after last enrollment
11.17 Recruit Prospect Cards	None
11.23 Parental Permission Forms	5 years after last enrolment
11.24 GED Score Report/Diploma	5 years after last enrollment
11.26 TOEFL Score Report	Permanent
11.27 SAT Score Report (if held by Offices other than OAR)	5 years after last enrolment
11.28 CLEP/AP Exam Score Report	5 years after last enrollment
11.29 Veterans Records	
h. Military Orders	10 years

12. Student Services

12.1 Office of the Dean of Student Services	
a. Student Grievance/Complaint Files	5 years in office after last enrollment, then dispose of provided all litigation is closed.
b. Student Disciplinary/Conduct Files	5 years in office after last enrollment, then dispose of provided all litigation is closed.
12.2 International Student Services	
a. F-1 Student Files	5 years (active and inactive)
12.3 Program Agreements	5 years upon termination or expiration
12.4 Program Review and Assessment Files	6 years after end of cycle
12.5 Budget Files	3 years after fiscal year
12.6 Operational Plans	6 years after end of fiscal year
12.7 Property/Inventory Files	

12.8 Minutes of Meetings	3 years
12.9 ASNMC	
a. Club and Organization Charters, Constitutions, Bylaws, and other related files	3 years, then offer to CNMI Archives for review and possible retention.
b. Elections Files	2 years, then dispose provided there is no litigation pending or anticipated.
c. Recognition Files	3 years
d. Files pertaining to amendments to ASNMC Constitution	Permanent

13. Student Services: Counseling Programs & Services

13.1 Student Counseling Files	Permanent
13.2 Academic Advising Files	5 years after last enrollment
13.3 Parental Permission Forms	5 years after last enrollment
13.4 Career Services	
a. Student Employee: Personnel Actions	5 years after last date of enrollment
b. Student Employee: I-9	Permanent
c. Student Employee: Applications (non-hired)	1 term
d. Event Evaluation Forms	7 years
13.5 College Access Challenge Grant (CACG) financial records, supporting documents, statistical records, and all other records pertinent to an award.	3 years (from end of award year in which aid was awarded)
13.6 Disability Support Services:	
a. Intake Assessments	
b. Student Registration Form	
c. Documentation supporting disability	
d. Documentation approving accommodations	

14. Student Services: Financial Aid Records

14.1 Records related to school eligibility	
a. Program Participation Agreement/Approval Letter/Eligibility and Certification Approval Report (ECAR)	3 years from the end of the award year for which the report was submitted

b. Application portion of the FISAP	3 years from the end of the award year for which the report was submitted
c. Accrediting and licensing agency reviews, approvals, and reports	
d. State agency reports	3 years from the end of the award year for which the report was submitted
e. Audit and program review reports	3 years from the end of the award year for which the report was submitted
f. Self-evaluation reports	3 years from the end of the award year for which the report was submitted
g. Other records, as specified in regulation, that pertain to factors of financial responsibility and standards of administrative capability	3 years from the end of the award year for which the report was submitted
14.2 Records relating to student eligibility	
a. Cost of attendance information	3 years from the end of the award year for which the aid was awarded
b. Documentation of a student's satisfactory academic progress (SAP)	3 years from the end of the award year for which the aid was awarded
c. Documentation of student's program of study and the courses in which the student was enrolled	3 years from the end of the award year for which the aid was awarded
d. Data used to establish student's admission, enrollment status, and period of enrollment	5 years (kept in OAR)
e. Required student certification statements and supporting documentation	3 years from the end of the award year for which the aid was awarded
f. Documents used to verify applicant data, and resolve conflicting information	3 years from the end of the award year for which the aid was awarded
g. Documentation of all professional judgment decisions	3 years from the end of the award year for which the aid was awarded
h. Financial aid history information for transfer students	3 years from the end of the award year for which the aid was awarded

14.3 Fiscal and administrative records	
a. Records of all FSA program transactions	3 years from the end of the award year for which the report was submitted
b. Bank statements for all accounts containing FSA funds	11 years after audit (kept in F.O.)
c. Records of student accounts, including each student's institutional charges, refunds, returns, and overpayments required for each enrollment period	10 years (kept in F.O.)
d. General ledger (control accounts) and related subsidiary ledgers that identify each FSA program transaction (FSA transactions must be separated from school's other financial transactions)	7 years (kept in F.O.)
e. Federal Work-Study payroll records	3 years from the end of the award year for which the aid was awarded
f. Federal Supplemental Educational Opportunity Grant records	3 years from the end of the award year for which the aid was awarded
g. FISOP portion of the FISAP	3 years from the end of the award year for which the report was submitted
h. Pell Grant Statements of Accounts	3 years from the end of the award year for which the aid was awarded
i. Cash requests and quarterly or monthly reports from the G5 payment system	7 years (kept in F.O.)
j. FSA program reconciliation reports	3 years from the end of the award year for which the aid was awarded
k. Audit reports and school responses	7 years (kept in CFAO's office)
l. State grant and scholarship award rosters and reports	Not applicable; Not reported to the FAO
m. Accrediting and licensing agency reports	
n. Records used to prepare the Income Grid on the FISAP	3 years from the end of the award year for which the report was submitted
o. Student's Status Confirmation Reports	3 years from the end of the award year for which the aid was awarded

14.4 Loan program records (NMC does not administer student loans)	
a. Loan certification or origination record, including the amount of the loan and the period of enrollment	3 years from the end of the award year in which the student last attended
b. The cost of attendance, estimated financial assistance, and estimated family contribution used to calculate the loan amount (and any other information that may be required to determine the borrower's eligibility, such as the student's Federal Pell Grant eligibility or ineligibility)	3 years from the end of the award year in which the student last attended
c. The date(s) the school disbursed the loan funds to the student (or to the parent borrower), and the amount(s) disbursed. (For loans delivered to the school by check, the date the school endorsed each loan check, if required.)	3 years from the end of the award year in which the student last attended
d. Documentation of the confirmation process for each academic year in which the school uses the multi-year feature of the Master Promissory Note. This may be part of the borrower's file, but acceptable documentation can also include a statement of the confirmation process that was printed in a student handbook or other financial aid publication for that school year. The documentation may be kept in paper or electronic form. There is no retention limit for this documentation; you must keep it indefinitely because it may affect the enforceability of loans.	Indefinite (until the loan is satisfied, or the documentations are needed to enforce the obligation)
14.5 College Access Challenge Grant Scholarship records	
a. CACG Scholarship Application	3 years from the end of the award year for which the aid was awarded
b. Documentation verifying financial need including, but not limited to the FAFSA	3 years from the end of the award year for which the aid was awarded

14.6 Military Veterans Educational Benefits records	
a. Application for VA Educational Benefits	3 years from the end of the award year for which the aid was awarded
b. Certification of Release or Discharge from Active Duty (DD 214)	3 years from the end of the award year for which the aid was awarded
c. Enrollment Certification	3 years from the end of the award year for which the aid was awarded

15. Workforce Development and Continuing Education

15.1 Instructor Contracts	5 years
15.2 Class Evaluations	5 years
15.3 Daily and Overall Class Attendance Records	5 years
15.4 Course Outlines	5 years
15.5 Certificates of Completion	5 years
15.6 Municipal Police Academy Transcripts	5 years
15.7 Municipal Police Academy Records	7 years

16. Employee Records

16.1 Pre-Employment Records	7 years after termination or expiration of employment.
a. Applications/resumes/interview notes: Not hired	
b. Applications/resumes/interview notes: Hired	
c. Background checks, driving records, employment verification, letters of reference: Not Hired	
d. Background checks, driving records, employment verification, letters of reference: Hired	
16.2 Employee Records	
a. I-9 Forms	
b. Compensation, job history, and timekeeping records.	
c. FMLA/USERRA and related leave records	
d. Performance appraisal/disciplinary action records	
e. Benefits Records	
f. Disputed Issues: DOL, EEOC, arbitration, court Action	

g. OSHA and Employee Safety Records	
h. Workers Compensation Claims	
16.3 Compliance Reports/Records	
a. EEO-1/VETS-100	
b. Annual Affirmative Action Plan	
c. OSHA 300/300A	
d. 5500 Report	
e. Federal/CNMI tax report	
14.4 Faculty Records	
a. Student classroom evaluations	
b. All other records including, grade books, tests, etc.	

17. Grants

17.1 Pell Grant Program	3 years (from end of award year in which aid was awarded)
17.2 Direct Grants	10 years
a. Records relating to all grant applications	
b. All financial and programmatic records, supporting documents, statistical records, and other records of recipients "reasonably pertinent" to the grant.	10 years
17.3 Grants to the Foundation	10 years

18. Public Safety Records

18.1 Uniform Crime Reports (CNMI & Federal)	6 years
18.2 Complaint dispatch report	Current & Previous Year
18.3 Incident Reports	6 years
18.4 Administrative Files	Current & Previous year
18.5 Key & Keycard Distribution	Inactive: Retain 1 year and dispose
18.5 Parking Sticker Applications	2 years beyond sticker expiration
18.6 Vehicle Citations	4 years
18.7 Records of Ticket Appeal Committee	4 years

19. Non-Discrimination in Education Records and Reports

19.1 Records relating to alleged violations of Title IX of the Education Amendments of 1972 to the Civil Rights Act of 1964	7 years after termination or expiration of employment.
19.2 Records of any modifications made to the	

policies and practices of the College and any remedial action taken pursuant to Title IX.	
19.3 Any records relating to alleged violations of Title VI of the Civil Rights Act of 1964.	
19.4 General Compliance Records	
19.5 Any records relating to alleged violations of the Rehabilitation Act of 1973	
19.6 Records on the medical condition or history of any applicant or employee in compliance with the Americans with Disabilities Act (ADA).	

20. Digital Records

20.1 E-mail	Subject to regular document retention policies; migrate to new software and storage media as upgrades occur
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21. Academic Programs & Services: Student Records

21.1 Student Advising Files	7 years from last date of enrollment
21.2 Faculty grade books and reports	7 years
21.3 Student portfolios of classwork	7 years