

TRIANGLE BIBLE INSTITUTE (TBI) POLICY

Policy Number: 403-16

Policy Title: RECORD RETENTION AND DESTRUCTION POLICY

Responsible Officer: Administrative Dean

Responsible Office: TBI Administration

Effective Date: January 1, 2016

I. POLICY STATEMENT

Triangle Bible Institute historically and presently generates a reasonable volume of records for either educational and/or administrative purposes. Policies concerning retention and proper maintenance of such records are an essential component of TBI's legacy and functionality. Record retention requires that different types of records be retained for specific periods of time. These records must be managed according to procedures that are outlined in this document.

II. RATIONALE

This policy is designed to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed by Triangle Bible Institute or are of no value are discarded at the proper time. This policy is also for the purpose of aiding employees of the TBI in understanding their obligations in retaining electronic documents - including email, Web files, text files, sound and movie files, PDF documents, and all Microsoft Office or other formatted files.

III. ENTITIES AFFECTED BY THIS POLICY

All TBI Officials, including Pastor of Star Ministries, the Board of Trustees, Executive Director, Deans, Directors, Satellite campuses, and all TBI employees, contractors and grantees are responsible for the maintenance of TBI records, and anyone assessing, creating or using TBI records will be affected by this policy. Anyone who maintain TBI records are responsible for establishing appropriate record retention management practices. Each administrative manager or a designee must:

1. Implement the record management practices;
2. Ensure that management practices are consistent with this policy;
3. Educate staff within the administrative unit in understanding sound records management practices and this policy;
4. Ensure that access to confidential records and information is restricted;
5. Preserve records of historic value and transfer to TBI Archives; and
6. Destroy inactive records that have no archival value upon passage of the applicable retention period.

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The department head of an office or designee having public records is responsible for ensuring compliance with this policy and with the Public Records Act. When an employee leaves a department, the department head is responsible for designating a new custodian and ensuring that the separating employee no longer has access to those records and that any public records in the separating employee's possession are properly transferred to the new custodian. The department head is responsible for contacting the Executive Director or Administrative Dean to arrange for the transfer of electronic records to the new custodian before the accounts are scheduled to be deleted.

IV. DEFINITIONS

Active Records: A record that is currently being used, or will be used, by the department that generated it. Records may remain active for a varying numbers of years, depending on the purpose for which they were created. The department has the responsibility of determining the access required and the security needed for the records.

Confidential Records: Records that contain confidential student, patient or employee information that should have limited access and be protected from inadvertent access or disclosure.

Confidential Information: Any information that is received or created that includes protected health information (PHI) under the Health Insurance Portability and Accountability Act (HIPAA), personal and educational information under Family Educational Rights and Privacy Act (FERPA), or any personal financial information under the Gramm-Leach-Bliley Act. This includes, but is not limited to, name, address, social security number, bank account numbers, financial or financial aid information, medical information, and student numbers.

Electronic records: Any record that is created, received, maintained or stored on TBI local workstations, central servers, laptops, smartphones or PDAs. Examples include, but are not limited to, electronic mail (email), instant messages, "tweets," social media, text messages, word processing documents, spreadsheets and databases.

Responsible Department: The department designated as having responsibility for retention and timely destruction of the particular types of TBI Records.

TBI Records: The original or a copy of any record. These can be either electronic or paper and were either received or created by the department.

V. POLICY PROCEDURES

1. CORRESPONDENCE AND INTERNAL MEMORANDA

Most correspondence and internal memoranda should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract is in effect. It is recommended that records that support a project be kept with the project and take on the retention time of that particular project file.

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2. ELECTRONIC DOCUMENTS

Work-related email is a Triangle Bible Institute record, and must be treated as such. Each email user must take responsibility for sorting out personal messages from work-related messages and retaining TBI records as directed in official records retention and disposition schedules. Email that does not meet the definition of a public record, e.g., personal email, or junk email, should be deleted immediately from the system.

3. INFORMATION TECHNOLOGY BACKUP FILES

TBI IT personnel will perform backups on a regular schedule of the email and electronic files stored on central servers for disaster recovery. These backups are to be used for system restoration purposes only. The IT system administrator is not the legal custodian of messages or records which may be included in such backups. TBI does not maintain central or distributed electronic archives of all electronic communications records sent or received. Electronic communications records are normally backed up, if at all, only to assure system integrity and reliability, not to provide for future retrieval, although back-ups may at times serve the latter purpose incidentally. Operators of TBI electronic communications services are not required by this policy to routinely retrieve electronic communications records from such back-up facilities for individuals.

4. LITIGATION HOLDS

When litigation against TBI or its employees is filed or threatened, the law imposes a duty to preserve all documents and records that pertain to the issues. As soon as TBI is made aware of pending or threatened litigation, a litigation hold directive will be issued to the legal custodians. The litigation hold directive overrides any records retention schedule that may have otherwise called for the transfer, disposal or destruction of the relevant documents, until the hold has been cleared by Senior Administrative personnel. No employee who has been of a litigation hold may alter, delete, overwrite, or re-write an electronic record, including image and audio/sound, which falls within the scope of that hold.

Email and computer accounts of separated employees that have been placed on a litigation hold will be maintained by TBI, or another entity designated until the hold is released. Each office upon notification of a legal matter must print out a hard copy of each document and maintain it in a file. Violation of the hold may subject the individual to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies. The law requires that you take affirmative steps to preserve information that is under a litigation hold. Each office must immediately disable any automatic archiving or deletion routines in its email system and on any other computer programs.

5. DISPOSAL AND DESTRUCTION OF RECORDS

If a determination is made in accordance with this policy that it is appropriate to dispose of certain records, they should be destroyed in one of the following ways:

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- a. Recycle non-confidential paper records;
- b. Shred or otherwise render unreadable confidential paper records; or
- c. Erase or destroy electronically stored data.

6. QUESTIONS ABOUT RECORD RETENTION OR DESTRUCTION

Questions about this policy or your responsibilities should be directed to the Office of the Executive Director at (703) 441-8557

VI. SANCTIONS

All entities noted in Section III of this policy must comport to these policies and confirm that their record keeping and retention system meets TBI standards. Failure to maintain records in accordance with the above policy could subject the TBI to liability and possibly substantial penalties under current law. Employees who fail to maintain records consistent with the policy could be subject to discipline, including termination.

VI. WEBSITE ADDRESS

www.trianglebibleinstitute.org

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RECORD RETENTION SCHEDULE

Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for physical records of Triangle Bible Institute (TBI) and the retention and disposal of electronic documents. If there are inconsistencies in the required retention periods, the longer period should be followed. Neither the procedures nor tables that follow are meant to be an all-inclusive listing for retention purposes, but rather guides for the more frequent or commonly used records that need to be retained. If particular records are not listed, it does not mean that they can or should be discarded or destroyed without first considering the general requirements of this policy. If there is a question, please consult the Compliance Officer.

APPNDIX A – RECORDS RETENTION SCHEDULE

RECORD CATEGORY	RETENTION SCHEDULE	RESPONSIBLE DEPARTMENT
ACADEMIC, STUDENT		
Academic Actions	5 years after graduation or last day of attendance	Office of Academic Dean
Academic Integrity Code Violations	5 years	Office of the Executive Director
Academic Records (including narrative evaluations, competency assessments)	Permanent	Office of Academic Dean
Change of Course Forms	5 years	Office of Academic Dean
Change of Grade Forms	Permanent	Office of Academic Dean
Change to Student ID number	Permanent	Office of Academic Dean
Class Lists (original)	Permanent	Office of Academic Dean
Consent to Release Personally Identifiable Information	5 years	Office of Academic Dean
Course Offerings	Permanent	Office of Academic Dean
Enrollment Verifications	1 year	Office of Academic Dean
Transcripts	Permanent	Office of Academic Dean
Graduation Lists	Permanent	Office of Academic Dean
Name Changes	Permanent	Office of Academic Dean
Student Class Schedules	1 year	Office of Academic Dean
Term Reports	7 years	Each School/Campus
Transcript Request	1 year	Office of Academic Dean
Transfer Credit Evaluations	5 years	Office of Academic Dean
Veteran Administration Certificates	5 years	Office of Academic Dean
Withdrawal Authorizations	2 years	Office of Academic Dean
Advanced Placement Records	5 years	Office of Academic Dean
Residency Change Documents	5 years	Office of Administrative & Academic Dean
International Student Forms	5 years	Office of Academic Dean
ADMINSTRATIVE RECORDS		
RECORD CATEGORY	RETENTION SCHEDULE	RESPONSIBLE DEPARTMENT
Departmental reports and files	3 years discuss with Archives before transferring	Each Office

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TBI Policy Council & Other School Committees	Retain until work has been completed and then transfer to TBI Policy Office	TBI Policy Council
Policy and Procedures	Permanent	TBI Policy Council
Publications, articles, information about faculty, staff and students	When office no longer needs this information, transfer to Archives	Each Office
Handbooks	Retain until replaced by another. When issued send replaced copy to Archives	Each Office

DEVELOPMENT AND ALUMNI RELATIONS

RECORD CATEGORY	RETENTION SCHEDULE	RESPONSIBLE DEPARTMENT
Alumni Records	Permanent	Development and Alumni Relations
Gift Records	7 years	Development and Alumni Relations
Gifts of Art to the TBI	Permanent	Development and Alumni Relations, Archives & Gifts
Original Gift Letter Agreements, Signed by the Executive Director	Permanent	Development and Alumni Relations
Original Gift Agreements, All Others	Permanent	Development and Alumni Relations
Planned Gifts	Permanent	Development and Alumni Relations

BENEFIT RECORDS

Description of benefits plans	Full plan period plus 1 year	Human Resources
Pension Plans and ERISA Benefits	6 years after filing date	Human Resources
Employee Medical Files - OSHA	30 years	Human Resources
Workman's Compensation Files	7 years after filing date	Human Resources

CONTRACT RECORDS

Design and Construction Contracts	Life of building	Star Ministries Trustees
Other Contracts (except research and employment)	10 years after the termination unless transfers ownership rights, then permanent	Star Ministries Trustees
Insurance Policies	3 years after expiration	Star Ministries Trustees
Equipment Warranties	Life of Equipment	Each Office
Claims, risk management, incident reports	10 years	Star Ministries Trustees
Real Estate acquisition & disposition documents, leases, & real estate exemptions	10 years after properties are sold or demolished, then transfer to Archives	Star Ministries Trustees

CORPORATE RECORDS

Accreditation Records	Permanent	Office of the Executive Director
Board of Trustees Minutes	Permanent	Administrative Dean
Bylaws	Permanent	Star Ministries Executive Office
Resolutions	Permanent	Star Ministries Executive Office
TBI Charter	Permanent	Star Ministries Executive Office

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FACULTY RECORDS		
RECORD CATEGORY	RETENTION SCHEDULE	RESPONSIBLE DEPARTMENT
Faculty Meeting minutes	When office no longer needs this information	Administrative Dean
Tenure or Promotion Dossiers	If action approved, 5 years; If tenure denied, 5 years from end of term appointment	Administrative Dean
Records of paid leaves / stipends	Permanent	Administrative Dean
FINANCIAL RECORDS		
Budget Files	7 years	Star Ministries Accountant; Executive Dir
Budget Recommendations	7 years	Star Ministries Accountant; Executive Dir
Consultant Services	7 years	Star Ministries Accountant; Executive Dir
General Purchasing Requisitions	7 years	Star Ministries Accountant; Executive Dir
Interdepartmental Service Charge	7 years	Star Ministries Accountant; Executive Dir
Gift Records	7 years	Development and Alumni Relations, Archives & Gifts
Request for Cancellation	7 years	Star Ministries Accountant; Executive Dir
Request for Special Event Authorization	7 years	Star Min. Exec Secretary; Exec. Dir
Request for Supplement	7 years	Star Min. Exec Secretary; Exec. Dir
Service Request	7 years	Star Min. Exec Secretary; Exec. Dir
Time and Attendance Reports	4 years in Comptroller's office	Administrative Dean
Travel Authorization	7 years	Exec Director; Administrative Dean
GENERAL RECORDS		
Audio Tapes	Permanent 2 copies (master and copy)	TBI Archives
Audiovisual Records	Permanent 2 copies (master and copy)	TBI Archives
Memorabilia	Permanent (master and copy)	TBI Archives
Publications	Permanent 3 copies [master and (2) copies]	TBI Archives
HEALTH & SAFETY RECORDS		
Records of inventory, use and control	Permanent	Administrative Dean
Records of disposal or abatement of toxic and hazardous waste	5 years	Administrative Dean
Records of hazardous waste generating	5 years	Administrative Dean
Records of asbestos exposure	30 years.	Administrative Dean and Human Resources
Material Safety Data Sheets	5 years	Administrative Dean
Chemical Inventories	5 years	Star Ministries Trustees
Internal Safety Inspections	15 years	Star Ministries Trustees
Accident Reports	4 years after report date	Exec. Director; Star Ministries Trustees
Crime Reports	4 years after report date	Exec. Director; Star Ministries Trustees
Property Damage Reports	4 years after report date	Exec. Director; Star Ministries Trustees

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INFORMATION TECHNOLOGY		
RECORD CATEGORY	RETENTION SCHEDULE	RESPONSIBLE DEPARTMENT
Request for Telephone Services Records	2 years after service rendered	Executive Director; IT Support
Cost Estimate for Telephone Services Records	3 years after initial services rendered	Executive Director; IT Support
LEGAL		
Consent Orders	Permanent	Pastor of Star Ministries; Executive Dir
Court Orders	Permanent	Pastor of Star Ministries; Executive Dir
Judgments	Permanent	Pastor of Star Ministries; Executive Dir
Releases	Permanent	Pastor of Star Ministries; Executive Dir
Settlements	Permanent	Pastor of Star Ministries; Executive Dir
Patents	Permanent	Pastor of Star Ministries; Executive Dir
Conflict of Interest Disclosure Statement	3 years	Executive Director; Administrative Dean
Litigation Documents and Records	5 years after final disposition	Pastor of Star Ministries; Executive Dir
Authorization for release of records, subpoenas, court order	5 years	Pastor of Star Ministries; Executive Dir
Employee Contracts	7 years after termination	Executive Director; Administrative Dean
Trademarks and Service marks	Permanently	Pastor of Star Ministries; Executive Dir
Patents and related papers	Permanently	Pastor of Star Ministries; Executive Dir
MATERIALS MANAGEMENT RECORDS		
Request for Purchase	5 years	Executive Director; Administrative Dean
Vendor Complaint	5 years	Executive Director; Administrative Dean
PAYROLL RECORDS		
Tax Returns and worksheets	Permanently	Star Ministries Accountant
Timesheets	7 years	Star Ministries Accountant; Admin Dean
Withholding tax statements	7 years	Star Ministries Accountant
Payroll records and summaries	7 years	Star Ministries Accountant
PENSION		
Employee Eligibility for Pension	7 years	Human Resources/ Star Ministries Acct
Employee Personal Information	7 years	Administrative Dean
Employee Service Records	7 years	Administrative Dean
Plan Administrator Setting Forth Authority to Pay, records of	Permanent	Human Resources/ Star Ministries Acct
Pension Paid to Employees or their Beneficiaries	7 years	Human Resources/ Star Ministries Acct
Pension Plans and All Attached Amendments	Permanent	Human Resources/ Star Ministries Acct
Pension or Pension Plans Files with the Department of Labor and Internal Revenue Service	Permanent	Human Resources/ Star Ministries Acct

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PERSONNEL RECORDS (NON-FACULTY)		
Employees' Leave Record	Permanent Retention	Human Resources
Notice of Position Opening	1 year	Human Resources
Personnel Recommendation	Permanent Retention in local storage	Human Resources
Position Recommendation	1 year	Human Resources
Personnel Files	3 years after termination	Human Resources
Family Medical Leave Records & Americans with Disabilities	3 years (Stored separately)	Human Resources
I-9 Forms	3 years	Human Resources
EEO & Affirmative Action Plans	3 years	Human Resources
PFM MAINTENANCE RECORDS		
PFM Work Request Files	3 years after work completed	Star Ministries Trustees
Request to Transfer Property Files	1 year after property has been disposed of	Star Ministries Trustees
Records of required testing of fire protection equipment	5 years	Star Ministries Trustees
Records of inspections, performance and emergency power plant equipment repairs	5 years	Star Ministries Trustees
Written report and evaluation of all external disaster plans	5 years	Star Ministries Trustees
REAL PROPERTY		
Documents for leases and licenses	6 years after expiration	Star Ministries Trustees
Property deeds, easements, licenses, rights of way, rights of first refusal, remainder interests, mortgages	Permanent	Star Ministries Trustees
Property Tax Returns filed with taxing jurisdiction	6 years	Star Ministries Trustees
Title Insurance Policies	10 years after disposal of property	Star Ministries Trustees
Contracts for Sale or Purchase	10 years after property sold	Star Ministries Trustees
RESEARCH / GRANT / SPONSORED PROGRAM RECORDS		
Administration Records and Supporting Documents	Up to 10 years after formal grant closeout as specified by individual agency requirements	Executive Director; Administrative Dean
Grants	Up to 10 years after formal grant closeout unless a transfer of ownership rights, then permanent. Final report fulfilling grants to Archives	Executive Director; Administrative Dean
Financial Records	Up to 10 years after formal grant closeout	Executive Director; Administrative Dean
Scientific and Statistical Records	Up to 10 years after formal grant closeout	Executive Director; Administrative Dean
Protocols and related documents or grants and contracts covering use of human subjects and animals in research	Permanent	Executive Director; Administrative Dean

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STUDENT RECORDS		
Student Disciplinary	5 years after graduation or 8 years after last date of enrollment	Executive Director; Administrative Dean
Student Employment	5 years after the end of the award year or reporting date	Human Resources; Executive Director; Administrative Dean
Student Financial Aid	5 years after the end of the award year or reporting date	Office of Financial Aid
Student Health Records	5 years after graduation or date of last attendance	Administrative Dean
Student Veteran/Dependent of Deceased Veteran	7 years after graduation or last date of enrollment	Human Resources; Administrative Dean
Student Handbooks	Permanent	Executive Director; Administrative Dean
ADA	7 years after graduation or last date of enrollment	Human Resources; Executive Director; Administrative Dean