



UNIVERSITY OF  
**DETROIT**  
**MERCY**

# RECORD RETENTION POLICY

Educational and Related Institutional Records

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# Records Retention Policy

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## Purpose

This policy establishes minimum retention requirements for University of Detroit Mercy educational and related institutional records in compliance with federal and accrediting regulations, including the U.S. Department of Education and the Higher Learning Commission (HLC). It reflects current practices for digital records management and replaces guidance developed when records were primarily maintained in paper format.

## Scope

This policy applies to all University offices that create, maintain, or serve as custodians of student educational records and related institutional records, regardless of format (paper, digital, or hybrid).

## Governing Regulations and Standards

This policy aligns with, but is not limited to, the following: - Family Educational Rights and Privacy Act (FERPA) - Higher Education Act (HEA) and associated federal regulations - U.S. Department of Education record retention requirements - Higher Learning Commission Criteria for Accreditation (record integrity, accuracy, and availability) - Veterans Affairs (VA) education benefit regulations - IRS requirements applicable to tax-exempt educational institutions

## General Principles

1. **Minimum Retention:** All retention periods represent minimum requirements. Units may retain records longer if required by law, accreditation, audit, or operational necessity.
2. **Custodianship:** Each record has an official custodian responsible for retention, integrity, and authorized destruction. Duplicate or convenience copies should be destroyed once no longer needed.
3. **Digital Records:** Official records may be maintained in digital format, provided systems ensure accuracy, security, retrievability, and long-term accessibility.
4. **Permanent Records:** Records designated as permanent must be preserved in systems or formats that ensure continued accessibility despite technological change.
5. **Disposition:** Failure to destroy records at the end of the retention period may increase institutional risk. Records must not be destroyed when subject to litigation, audit, investigation, or accreditation review.

## Official Academic Record

The official academic record (transcript) is the authoritative and permanent record of a student's academic history. Supporting documentation used to create or modify the academic record may have defined retention periods but does not replace the transcript as the permanent record.

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## Retention Schedules

**Note:** Retention schedules below reflect updated practices for digital records while preserving federally required timeframes.

### A. Admissions Records – Prospects and Inquiries

**Retention Period:** 2 years after application term/inquiry

**Custodian:** Admissions / Registrar / International Student Office (as applicable)

Includes:

- Applications for admission
- Acceptance or denial notifications
- Test scores (ACT, SAT, GRE, GMAT, etc.)
- Transcripts (high school and prior institutions)
- Letters of recommendation
- Recruitment materials
- International admission documentation

Prospects and inquiries who do not enroll are not covered by FERPA.

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### B. Admissions Records – Applicants who do not enroll

**Retention Period:** 7 years after application term

**Custodian:** Admissions / Registrar / International Student Office (as applicable)

Includes:

- Applications for admission
- Acceptance or denial notifications
- Test scores (ACT, SAT, GRE, GMAT, etc.)
- Transcripts (high school and prior institutions)
- Letters of recommendation
- Recruitment materials

- International admission documentation

Applicants who do not enroll are not covered by FERPA.

### C. Admissions Records – Enrolled Students

**Retention Period:** 5 years after graduation or last date of attendance, unless otherwise noted.

**Custodian:** College/School or Registrar

Includes:

- Applications for admission and readmission
- Admission decisions and supporting documentation
- Placement testing and evaluations
- Residency determinations
- Military and VA-related admission documentation
- International student immigration records (see federal requirements for extended retention)

The official transcript is retained permanently.

### D. Registration, Enrollment, and Academic Progress Records

<b>Record Type</b>	<b>Retention</b>
Academic transcripts	Permanent
Degree conferral records	Permanent
Grade change documentation	Permanent
Degree audits and evaluations	5 years after graduation or last attendance
Add/drop, registration, and withdrawal forms	5 years after graduation or last attendance
Academic standing actions	5 years after graduation or last attendance

### E. FERPA Records

**Retention Period:** Same as the underlying educational record or permanent, where applicable

Includes:

- Records of disclosures
- Student consents and waivers
- Requests for nondisclosure of directory information

## F. Financial Aid Records

**Retention Period:** Minimum 3 years from end of award year or resolution of audit/review

**Custodian:** Financial Aid Office

Retention follows U.S. Department of Education requirements. Records involved in audits or investigations must be retained until final resolution.

## G. Accreditation, Compliance, and Institutional Reporting

<b>Record</b>	<b>Retention</b>
Academic catalogs	Permanent
Schedules of classes	Permanent
Commencement programs	Permanent
Enrollment and degree statistics	Permanent
Accreditation correspondence	Minimum 5 years after review cycle

## Record Destruction

Records must be destroyed in a manner that protects confidentiality and complies with FERPA and institutional data security standards. Digital records must be irretrievably deleted; paper records must be securely shredded.

## Policy Review

This policy will be reviewed no less than every five years or sooner if required by changes in law, regulation, or accreditation standards.

## Records Not Governed by This Policy

The records listed below are not educational records under FERPA or are governed by separate federal or institutional requirements. They are included here solely to clarify custodial responsibility and do not fall under the retention schedules established in this policy.

## Custodial Responsibility by Record Type

<b><u>Record Category</u></b>	<b><u>Description / Examples</u></b>	<b><u>Governing Framework</u></b>	<b><u>Responsible Office</u></b>
<b>Medical Records</b>	Health visits, immunization records, treatment notes, clinical documentation	Applicable health privacy laws	Wellness Center
<b>Clinic Records</b>	Patient/Client records at our Dental, Law, or Optometry clinics	Professional confidentiality standards/Applicable health privacy laws	Dental, Law, or Optometry Clinic/Institute
<b>Counseling &amp; Psychological Records</b>	Counseling notes, therapy records, treatment plans	Professional confidentiality standards/Applicable health privacy laws	Counseling Clinic
<b>Law Enforcement Records</b>	Incident reports, investigation files, arrest records, daily logs	Clery Act	Public Safety
<b>Human Resources Employment Records</b>	Payroll, performance reviews, benefits, employment contracts	Employment law; HR policies	Human Resources
<b>Student Employment Records</b>	Work-study payroll, time sheets, employment actions	Dept. of Ed. Title IV (as applicable); HR policies	Human Resources / Financial Aid
<b>Student Conduct Records</b>	Incident reports, investigation files, non-academic sanction information	Student Life Student Code of Conduct	Student Life
<b>Housing Records</b>	On-campus residency information	Residence Life Policies	Residence Life
<b>Financial Aid Fiscal Records</b>	Title IV disbursements, reconciliations, audits, fund management	Dept. of Ed. regulations	Financial Aid / Finance

<b>Veterans Affairs Compliance Records</b>	VA certifications, benefit calculations, enrollment reporting	VA regulations	Registrar
<b>Institutional Compliance &amp; Reporting Records</b>	IRS nondiscrimination documentation, equity reporting, accreditation disclosures	IRS, Dept. of Ed., accrediting agencies	Institutional Research / Finance
<b>Institutional Review Board (IRB) Records</b>	Records regarding protection of human research volunteers	Dept. of Health and Human Services (HHS) regulations	Academic Affairs
<b>Campus Security &amp; Clery Records</b>	Crime statistics, annual security reports, disclosures	Clery Act	Public Safety
<b>Alumni Records</b>	Post-graduation communications, advancement data	Advancement policies	Alumni Relations / Advancement
<b>Sole Possession Records</b>	Personal notes kept by faculty or staff not shared or used for decisions	FERPA exclusion	Individual faculty/staff member

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