Data Record Retention and Destruction Policy

1.0 Purpose

The purpose of this Policy is to ensure that necessary records and documents are adequately protected and maintained. It ensures that records no longer needed by Calhoun Community College or are of no value are discarded at the proper time. This document represents Calhoun Community College's Information Technologies department's policy regarding the retention and disposal of electronic records and documents.

This policy will employees in understanding the obligations of CCCIT in retaining electronic documents - including e-mail, Web files, text files, sound and movie files, PDF documents, and all other formatted files.

2.0 Scope

This policy applies to students, and all college employees, including, but not limited to, faculty, staff, consultants, or other third party representative. This policy also applies to all individuals, whether authorized or not, who use the College's Information Systems from any location. Use of CCC information systems, even when carried out on a privately owned computer that is not managed or maintained by CCCIT, is governed by this policy.

3.0 Policy

Calhoun Community College operates a hybrid record keeping system composed of paper and electronic records. CCCIT is only responsible for paper records related to the business transactions and internal management functions of the Information Technologies department. This policy only applies to CCCIT controlled resources. Departments outside of CCCIT are responsible for their own records retention and destruction practices if operation occurs on a resource outside of CCCIT management.

Calhoun Community College Information Technologies recognizes and addresses two data records types: Temporary Records and Permanent Records

Temporary Records – Temporary records should be held for what is considered their active life and be disposed of once all fiscal, legal, and administrative requirements have been met.

Permanent Records – Permanent records should be held permanently and never disposed or destroyed. Permanent data records mostly consist of items related to the student record, curriculum, course catalogs, etc. A full list of permanent records can be found via the State Records Commission in the Functional Analysis & Records Disposition Authority

4.0 Statement of Direction/Practicum

The Chief Information Officer is in charge of the administration of this policy and the implementation of processes and procedures to ensure that the retention and destruction policy is followed. The administrator is also authorized to: make modifications to the retention schedule from time to time to ensure that it is in compliance with local, state and federal laws; annually review the record retention and disposal program; monitor compliance with this Policy and includes the appropriate CCCIT documents and CCCIT responses to the Records Disposition Authority

Suspension of record disposal in the event of litigation or claims - In the event CCCIT is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning Calhoun Community College or the commencement of any litigation against or concerning Calhoun Community College, such employee shall inform the administrator and any further disposal of documents shall be suspended until shall time as the administrator, with the advice of counsel, determines otherwise. The administrator shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

Temporary Records – Temporary records are disposed of per the Data Records Retention and Destruction Policy. See below for primary temporary record sources and their retention and destruction schedule.

Computers and Servers– employee and student use computers, along with CCCIT servers are replaced on a schedule per the CCC Technology Plan.

Student and General Use Computers – Student and general use computers are in a non-persistent state and do not retain any custom or ad hoc data.

Employee Use Computers - The hard drives from employee use computers will be copied and transferred to the new computer being issued to the employee. The old hard drive is then erased with Department of Defense compliant data erasure software that follows the guidelines for media sanitization using DoD standards. The software uses DOD 5220.22-M (3 passes), DoD 5200.22-M (ECE) (7 passes), and DoD 5200.28-STD (7 passes) to permanently wipe hard drives & SSDs across PC, Mac & Server beyond any scope of recovery. For employees leaving the college with either no replacement or under extenuating circumstances, a copy of their hard drive will be kept intact in the CCCIT department for a minimum of 12 months after separation.

Administrative Servers – Since the completion of the move to the OneACCS Ellucian Banner administrative system, no administrative servers on campus contain permanent records. Remaining servers contain temporary records and follow the same schedule as Employee Use Computers. For server migrations, all data is transferred to the new platform and all legacy hard drives are erased per the DoD standards mentioned above. For decommissioned servers with data not being transferred, the hard drives will be kept intact in the CCCIT department for a minimum of 9 months after decommissioning. If all data was transferred, all legacy hard drives are erased per the DoD standards mentioned above immediately.

File Servers/Data Shares – File servers and data shares are backed up and administered per the CCC Disaster Recovery Plan. See CCC Disaster Recovery Plan (confidential), section “Other Servers” for more information. Each department that is an administrator of their share is responsible for maintaining and deleting data files and records. While CCCIT ensures the accessibility and continuity of the servers as a whole, the actual file and data shares are the responsibility of the assigned department.

Email - Email is temporary and no longer considered permanent record. See Calhoun Email Policy and Procedures, section 4.0 Retention and Archival for more information.

Paper Records – Paper records that are considered temporary are stored in the CCCIT department. Paper records kept on file are primarily one of two types: Employee Personnel Information and Vendor Purchasing Information.

Employee Personnel Information - These records contain information that may be used to verify employment, salary, and benefits for retirement purposes.

Vendor Purchasing Information – These records containing information that may be used to verify purchases, delivery, payment, etc. Typical records may be quotes, requisitions, purchase orders, packing slips and invoices

Permanent Records – Permanent records are never disposed of per the Data Records Retention and Destruction Policy.

Since the completion of the move to the OneACCS Ellucian Banner administrative system, the Calhoun Community College Information Technologies Department no longer stores permanent student records. These records are stored in the cloud and administered by the Alabama Community College System office. CCCIT no longer maintains administrative privileges to the OnceACCS Ellucian Banner System or the associated document management system and is not responsible for the retention or backup of these documents. Calhoun Admissions and Records, Financial Aid, Advising, and other administrative offices have access to these records, however security and administration resides with the ACCS system office.

5.0 Enforcement

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment and legal action.