

Record Retention and Disposal of College Records

Palmer College of Chiropractic (College) sets forth standards and procedures for the retention and disposal of College records 1) to identify documents that must be retained permanently or temporarily due to federal or state legal requirements or for valid administrative reasons, 2) to provide guidance and clarification on which documents have lasting archival value to the College and should be preserved in its Archives, 3) to provide for the routine and timely disposal of documents which need not be retained for legal or administrative reasons and have no historical value.

SCOPE

This Record Retention and Disposal of College Records policy (Policy) applies to the entire College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida) and any other person(s), groups, or organizations affiliated with any Palmer campus.

DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:

- > The term **“College”** refers to Palmer College of Chiropractic, including operations on the Davenport campus; Florida campus; and West campus.
- > The term **“record”** includes, but is not limited to any official printed material, papers, correspondence, minutes, committee files, reports, financial and associated records, surveys, books, maps, photographs, electronic files, original microfilm, computer diskettes, computer tapes, CD-ROMs, cassettes, video tapes or other documentary material regardless of physical form or characteristics, made, produced, executed or received by any employee or person for the purpose of or in association with College operations.

ADMINISTRATIVE RULES

Administration

The Chief Compliance Officer is responsible for the administration of this Policy and the implementation of processes and procedures to ensure that the College's Record Retention and Disposal Schedule is followed.

Ownership of Records

Records created through official College activities are the property of the College.

Applicability

This Policy applies to all records generated in the course of the College's operation, including both original documents and reproductions. It also applies to electronic documents.

This Policy is not intended to apply to the appropriate disposal of individual documents when warranted and approved in the course of an employee's daily activities but is intended to apply to the disposal of large quantities of College records no longer required.

Standards for Record Retention and Disposal

The College's standards for record retention and disposal are set forth in the Record Retention and Disposal Schedule in the Appendix of this Policy.

Revisions to the Record Retention and Disposal Schedule

The Chief Compliance Officer is authorized to make modifications to the Record Retention Schedule from time to time to ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories for the College; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

All proposed changes, additions, or revisions to the Record Retention and Disposal Schedule in the Appendix of this Policy shall be submitted in writing to the Chief Compliance Officer for review and approval. Approved changes will be incorporated into the Records Retention and Disposal Schedule.

Disposal of College Records

The Chief Compliance Officer, in consultation with the Chancellor, may authorize the disposal of College records upon meeting the following criteria:

1. The records to be disposed of meet or exceed the time frames set forth for such records in the Record Retention and Disposal Schedule in the Appendix of this Policy.
2. The disposal of the records complies with statutory, contractual or accreditation obligations.
3. The records to be disposed of do not relate to or contain information regarding current, pending or potential litigation involving the College. Any questions regarding these criteria should be addressed to the College's general counsel.
4. Records containing student information or sensitive and/or confidential information must be shredded or otherwise rendered unreadable prior to disposal.

Under no circumstances shall any employee dispose of College records without following the above procedures.

If an employee seeks to dispose of certain College records that are not listed in the College's Record Retention and Disposal Schedule, the employee cannot dispose of the records without the approval of the Administrator.

Suspension of Record Disposal

In the event of an audit; investigation; subpoena; request to review or provide copies of documents; pending litigation; or any situation that might give rise to legal action, Chief Compliance Officer is to be notified immediately and record disposal shall be suspended until further notice by Chief Compliance Officer.

Confidential Destruction by Commercial or Non-profit Vendor

Confidential destruction performed by approved commercial or non-profit vendors shall be subject to such contractual obligations as required by the Chief Compliance Officer. In no case shall such contractual arrangements introduce standards, policy or procedures less protective of confidential records than those rules which are described in this Policy.

Archival of Records

Inactive records that may be considered of permanent, historical or legal value should be transferred to the College's Archives. Such records should be kept in the designated areas until the time that they are archived. Records must be labeled using the procedures in effect at the time of storage, which will include, but are not limited to the subject, date, department and disposition or archiving date.

Division/Department Responsibility

It is the responsibility of each Vice Chancellor to ensure effective record retention management for his/her areas of responsibility so that records are not arbitrarily destroyed and legal record keeping requirements are met. Each division shall routinely evaluate its record retention schedule to ensure compliance with federal, state and departmental requirements.

Employee Responsibility

All employees are required to reference the Record Retention and Disposal schedule to determine:

1. The length of time a particular class of records must be maintained; and
2. The final disposition of a record.

Training

All staff that either generate and/or exercise control over records should be trained in basic record retention requirements.

STANDARD INSTITUTIONAL POLICY PROVISIONS

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees and students to know and comply with these standards.

- > [Standard Provisions Applicable to All Institutional Policies](#)

Additional Information

ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES

This Policy is supplemented below. It is the responsibility of all employees and students to know and comply with policies and procedures as supplemented.

POLICIES

- > [Student Records – FERPA](#)

PROCESSES AND/OR PROCEDURES

- > [Record Retention and Disposal Schedule](#)

FORMS/INSTRUCTIONS

- > N/A

OTHER RELATED INFORMATION

- > N/A

CONTACTS

- > Earlye Julien, PHR, M.S.Ed, CQIA
Senior Director for Compliance & Chief Compliance Officer
1000 Brady Street
Davenport, IA 52803
(563) 884-5476
earlye.julien@palmer.edu

HISTORY

Last Revised: February 22, 2019

Adopted: October 31, 2010

Last Administrative Review: November 4, 2010

Responsible Officer: Jennifer Randazzo, M.A.S., C.P.A.
Vice Chancellor of Finance
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5141
jennifer.randazzo@palmer.edu

Issuing Office: Office of Compliance
Earlye Julien, PHR, M.S.Ed., CQIA
Senior Director for Compliance
Palmer College of Chiropractic
1000 Brady Street
Davenport, Iowa
Phone: (563) 884-5476
Fax: (563) 884-5883
earlye.julien@palmer.edu