

## **RECORD RETENTION POLICY**

**Effective January 1, 2010**

### **INTRODUCTION**

Colleges and universities, like most businesses, generate a voluminous amount of paperwork. These reports, reviews, returns and registers are necessary, and without them colleges would be unable to function effectively. However, not all documents must be kept into perpetuity. Policies such as this Record Retention Policy are extremely effective, if properly enforced, and provide a suggested timetable for the maintenance and disposal of certain documents. The main goals of successful record retention policies are to create an organizational scheme that allows an institution to uniformly keep documents for as long they are needed, and to store the documents in a manner that is consistent and easily available.<sup>1</sup>

It has been suggested that organizations keep records as evidence of prior practices. This is particularly true in the context of higher education. It is necessary to develop a retention plan that recognizes the importance of certain documents as templates, but effectively eliminates them after they become obsolete. Record retention policies are also exceedingly important with respect to anticipated litigation. Retention policies are not intended to excuse the hasty destruction of damaging documents, but when disposal of documents is done in good faith and pursuant to a well-established scheme, courts will rarely find evidence of wrongdoing.

This Record Retention Policy is the result of a comprehensive assimilation of a variety of sources, including several record retention schedules, academic scholarship and federal regulations. It was developed in good faith for the purposes of providing an efficient scheme for effectively storing, maintaining and disposing of documents, meeting legal standards, and avoiding allegations of selective enforcement and defensive document destruction.

### **STATEMENT OF POLICY**

Muhlenberg College recognizes the need for the orderly management and retrieval of all official records and a documented records retention and destruction schedule that acts in accordance with all state and federal laws and regulations. All official records (paper, electronic and any other media) will be retained for the periods stated in the Record Retention Schedules. After a specified period of time, official records will be disposed of in a manner that is consistent with prescribed records management procedures. Muhlenberg College is committed to safeguard against the unauthorized or accidental disclosure of confidential records and information.<sup>2</sup>

### **CONFIDENTIAL RECORDS**

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<sup>1</sup> John P. Hutchins, *Document Retention Basics*, PLI ORDER NO. 11253 657, 661 (2007).

<sup>2</sup> Strict compliance with the College's Electronic Communication Policy is required to prevent unauthorized or accidental disclosure of confidential records and information. This Policy is attached for reference.

**1. The following types of records are absolutely confidential:**

- a) Individual education records of living students or former students, as defined by the Family Educational Rights and Privacy Act of 1974 (FERPA), 20 U.S.C. § 1232g, unless said records are exempt from FERPA non-disclosure provisions;
- b) Individual employment records of living current or former faculty members, administrators or other staff members, including records which concern hiring, appointment, promotion, tenure, salary, performance, termination or other circumstances of employment, unless the faculty member, administrator, or staff member grants access in writing;
- c) Resources that include “protected health information” as the same is defined by the Health Insurance Portability and Accountability Act of 1966 (HIPAA), 42 U.S.C. § 1171 *et seq.*, and regulations promulgated thereunder;
- d) Other records where usage might constitute an invasion of privacy;
- e) Use of records restricted by contact.

**2. The following types of records generally are treated as confidential:**

- a) Records of a sitting administration (See Board of Trustee Working Resolutions II. D.;
- b) Records which might expose Muhlenberg College to legal liability.

**RECOMMENDED PROCEDURE FOR CONFIDENTIAL DESTRUCTION**

**1. Retention Period.**

All documents, of all mediums, including paper and electronic, must be stored, transferred and destroyed according to the attached Retention Schedule. See Appendix “A,” Retention Schedule. Electronic copies of paper documents must be stored, transferred and destroyed according to the same Retention Schedule as the original, paper versions.

**2. Suspension of Record Destruction in the Event of a Claim, Lawsuit, Government Investigation, Subpoena, Summons or Other Ongoing Matters.**

All documents, of all mediums, including paper and electronic, pertaining to pending or reasonably anticipated legal action or federal or state investigation are subject to a “**LEGAL HOLD**,” and must be retained according to the attached Litigation

Document Retention Policy. See Appendix "B," Litigation Document Retention Policy. These documents must not be destroyed, though it may have been otherwise rightful to do so under this Policy. A "**LEGAL HOLD**," and the documents it encompasses, will depend on the particular allegations of each case. Consequently, employees must immediately notify senior management officials of any pending or reasonably foreseeable claim or litigation.

### **3. Safe and Secure Disposal.**

Once the retention period has passed, the records move toward disposition, or the records' final state. If the Retention Schedule indicates that a document must be transferred to Archives, the documents should be boxed and transferred to storage. If the documents or records must be destroyed, apply the following.

a) **Non-confidential records** should be recycled;

b) **Confidential records.**

i) **Paper Records** containing confidential information should be shredded, pulverized or mashed so as to be completely destroyed and unable to be reconstructed;

ii) **Electronic or Machine-Readable Records** containing electronically stored information (ESI) should be erased or destroyed. IT personnel should be involved as to make certain that all server copies, backups etc. are fully destroyed. With regard to floppy disks and back-up tapes, it is recommended these storage devices be physically destroyed;

iii) **Films, audio and videotapes** containing confidential information should also be physically destroyed, not simply thrown away. It is possible to overwrite audio and videotapes with other, non-confidential sound and images, but if this is done, it is recommended that it be done by an authorized member of the staff in the office of origin.

# APPENDIX A

## RETENTION SCHEDULE

*Guide to Muhlenberg College's Record Retention Policy*

Retention Schedule  
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**RETENTION SCHEDULE**

**ACCOUNTING RECORDS AND SUGGESTED RETENTION PERIODS<sup>3</sup>**

ACCOUNTS PAYABLE LEDGER	7	CHECK REGISTER	P
Accounts Receivable Aging Reports	7	Expense Reports	7
Accounts Receivable Ledger	7	Financial Statements	P
Accounts Receivable Invoices	7	General Ledger	P
Accounts Written Off	5	Inventory Lists	7
Authorization – Accounting	P	Investment – Sales/Purchases	P
Balance Sheets	7	Invoices	7
Bank Reconciliations	7	Journal Entries	P
Bank Deposit Slips	3	Petty Cash Records	7
Budgets	3	Profit/Loss Statements	P
Cancelled Checks	10	Purchase Orders	7
Cash Book	P	Subsidiary Ledger	P
Cash Disbursement & Receipt Record	P	Trial Balance	P
Cash Sales Slips	7	Vendor Invoices	7
Charge Slips	7	Voucher Check Copies	7
Chart Of Accounts	P		

<sup>3</sup> “P” indicates that it is suggested that the record in question be retained permanently and numbers indicate the suggested retention period in years.

**COLLEGE ADMINISTRATION RECORDS AND SUGGESTED RETENTION PERIODS**

ACCREDITATION RECORDS	P	CONTRACTS – AFTER TERMINATION	P
Alumni Records	P	Contributions – Pledges, Gifts And Donor Related Documentation	P
Amendments	P	Contributions – Planned gifts (trusts, life income, agreements and annuities)	P
Annual Reports	P	Correspondence – General	P
Audit Reports – Public	P	Directives (Internal and External)	0 after superseded; 1 copy to Archives
Audit Reports – Internal	6	Election Records	P
Board of Trustees, Committees and Minutes	P	Financial Statements	P
Bylaws	P	Government Reports	5
Capital Asset Records	Life of the asset + 1	Organizational Charts	P
Capital Project Building and Renovation Records	Life of the building + 1	Policies and Procedures – Internal	1 after superseded; Review by Archives
Charter	P	Strategic Plans and Supporting Documents	5; Transfer to Archives; P
Committees (Agendas, Minutes and Reports)	3; Review by Archives		

**CURRICULUM RECORDS AND SUGGESTED RETENTION PERIODS**

CATALOGS	P	CURRICULUM – PROPOSALS DENIED	3 AFTER DENIAL
Class Lists	P	Evaluations Of Internal Operations, Self Studies, Accreditation	10; transfer to archives
Course History Files	10	Schedule Of Classes	P
Curriculum – Current	4 after superseded; Catalogue archived	Student Rated Teacher Evaluations	5
Curriculum – Proposals Approved	3 after course ceases to be offered	Textbook Orders	3



**HUMAN RESOURCES RECORDS AND SUGGESTED RETENTION PERIOD**

ACADEMIC PROMOTION AND TENURE FILES	<i>SEE SCHOOL'S POLICY</i>	PERFORMANCE RECORD – AFTER TERMINATION	7
Accident Reports – Settled	7	Personnel Action Forms	3
Attendance Records	7	Personnel File – After Termination	7
Dental Benefits	5	Personnel Files – Current Employees	P
Disability Benefits – After Expiration/Settlement	7	Profit Sharing Agreement	P
Employee Medical History	7	Safety Reports	5
Employment Application – Hired, After Termination	3	Pension Plan Agreements	P
Employment Application – Not Hired	3	Sick Pay	4
Employee Pension Records	6	Staff Review and Development Evaluations	3
Family & Medical Leave	3	Student Rated Teacher Evaluations	5
Garnishments	5	Training and Development Attendance	3
Life Insurance Benefits	5	Vacation Files	4
Medical Benefits	7	Workers' Compensation Benefits	10

**INSURANCE RECORDS AND SUGGESTED RETENTION PERIODS**

AUTOMOBILE INSURANCE CLAIMS	10	INSURANCE APPRAISALS	6
Disability Insurance Claims – After Termination	7	Safety Records	6
Expired Insurance Policies	10	Foreign Insurance Policies	3
Fire Inspection Reports	6		

**LEGAL RECORDS AND SUGGESTED RETENTION PERIODS**

BILLS OF SALE	P	DEEDS/TITLES	P
Business Permits	P	Judgments	P
Claims/Litigation: Torts & Breach of Contract	P	Leases – After Expired	10
Contracts – Employees	7	Licenses	P
Contracts – General	7	Mortgages	P
Contracts – Government	P	Notes Receivable – Cancelled	10
Contracts – Labor Unions	P	Patents	P
Contracts – Special	P	Registered Trademarks	P
Copyrights	P	Releases	P
Correspondence – Legal	P	Settlements	P
Court Orders	P	Stock and Bond Records	P

**MISCELLANEOUS RECORDS AND SUGGESTED RETENTION PERIODS**

RECEIVING DOCUMENTS	10	TELECOMMUNICATIONS COPIES	1
Security – Classified Violations	P	Title Papers	P
Security – Visitor Clearance	2	Vehicle Operating and Maintenance	2

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**PAYROLL RECORDS AND SUGGESTED RETENTION PERIODS**

CONTRACTORS	3 FROM COMPLETION OF CONTRACT	PAYROLL RECORDS – AFTER TERMINATION	10
Checks – Payroll	7	Salary History	8
Election forms (W-4, direct deposit)	7	Time Reports	7
Employee Payroll Records	7	W-2 Forms	7
Employee Withholding Exemption Certificates	10	Vacation/Sick Pay	4
Payroll Register	4		

**STUDENT LIFE RECORDS AND SUGGESTED RETENTION PERIODS**

PUBLICATIONS	TRANSFERRED TO ARCHIVES AS DISTRIBUTED; P	EVENT PRODUCTION DOCUMENTATION	3; TRANSFERRED TO ARCHIVES; P
Groups and Organizations (including Fraternities and Sororities) – Meeting Minutes	3; P in Archives	Handbooks	Transfer to Archives as distributed; P
Groups and Organizations – Rosters	3; P in Archives	Multi-Media Productions	Transfer to Archives as distributed; P
Groups and Organizations – Photographs	3; P in Archives		

**STUDENT RECORDS AND SUGGESTED RETENTION PERIODS**

*Student Records:* Student educational records are defined as those records (in any format, electronic or hard copy) which contain information directly related to a student and are maintained by the College or by a person acting for the College pursuant to a College or departmental policy.

*Student Educational Records:* Are subject to the restrictions delineated in the Federal Educational Rights and Privacy Act (FERPA), and do not include:

- Records of instructional, supervisory, and administrative personnel and educational personnel ancillary thereto which are in the sole possession of the maker thereof and which are not accessible or revealed to any other person except a substitute;
- Records maintained by a law enforcement unit of the educational agency or institution that were created by that law enforcement unit for the purpose of law enforcement.
- In the case of persons who are employed by an educational agency or institution but who are not in attendance at such agency or institution, records made and maintained in the normal course of business which relate exclusively to such person in that person's capacity as an employee and are not available for use for any other purpose; or
- Records on a student who is eighteen years of age or older, or is attending an institution of postsecondary education, which are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his professional or paraprofessional capacity, or assisting in that capacity, and which are made, maintained, or used only in connection with the provision of treatment to the student, and are not available to anyone other than persons providing such treatment, except that such records can be personally reviewed by a physician or other appropriate professional of the student's choice.<sup>4</sup>
- Alumni records

ACADEMIC ACTION AUTHORIZATIONS (DISMISSAL, ETC.)	5 YEARS AFTER GRADUATION OR DATE OF LAST ATTENDANCE	GRADE APPEALS	P
Admissions Data/Documents For Applicants Who Do Not Enroll	3 years after application term	Grade Books	3
Admissions Data/Documents For Applicants Who Enroll	5 years after graduation or date of last	Grades	P

<sup>4</sup> Federal Educational Right to Privacy Act, 20 U.S.C. § 1232g(a)(4)(B)(i-iv).

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	attendance		
Advisor's Files	3 years after last activity	Graduate Candidacy And Comprehensive Examinations	7 after last activity
Alumni Lists	P	Graduation Lists	P
Application For Advanced Credit	5 years after last activity	Loan Records	3 after student loans are repaid in full
Applications For Graduation	1 year after graduation or date of last attendance	Majors/Minors	5 after last activity
Bulletins/Course Catalogs	5; Transfer To Archives	Name Change Authorizations	5 years after graduation or date of last attendance
Change Of Grade Forms	P	Recruitment	3
Commencement Programs	5; Transfer to Archives	Recruitment – Correspondence	3
Correspondence, Relevant	5 years after graduation or date of last attendance	Recruitment – Contact Reports	3; Review by Archives
Degree Audit Records/Curriculum Change Authorizations/ Graduation Authorizations	5 years after graduation or date of last attendance	Registrar's Statistical Reports / including Grade Statistics; Race/Ethnicity Statistics	P
Enrollment Verifications	1 year after verification	Teacher Certification	1 year after certification
Examinations And Answer Sheets	1	Theses	Transfer 1 copy to Library for permanent retention
FERPA Release Forms	P	Transcript	P in Registrar's Office

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FINANCIAL AID – SCHOLARSHIPS, GRANTS, ASSISTANTSHIPS AND AWARDS	0 AFTER SUPERSEDED; COPY TO ARCHIVES  3 AFTER AWARDS ARE DISTRIBUTED	TRANSCRIPT REQUESTS (STUDENT)	1 YEAR AFTER DATE SUBMITTED
Financial Aid – Terms/Requirements	3 after awards are distributed; review by archives	Transfer Credit Evaluations	5 years after graduation or date of last attendance
Financial Aid – Correspondence	3 after awards are distributed	Tuition And Fee Charges	6
Financial Aid – Reports	3 after awards are distributed	Veterans Grade Reports And/Or Statements Of Progress	3 years after termination of enrollment
Financial Aid – Applications	3		

**TAXATION RECORDS AND SUGGESTED RETENTION PERIODS**

ACCOUNTING FIRMS – TAX RETURN PREPARERS	4	FUTA/FICA INCOME TAX WITHHOLDING	4
Accounting Firms – Tax Returns Prepared	4	Payroll Tax Returns	7
Cancelled checks – payroll tax payments	7	Property Tax Returns	P
Correspondence - Tax	P	Revenue Agent Reports	P
Depreciation Schedules	7	Sales Tax Returns	P
Income Tax Returns – Form 990	7	Transfer Pricing	4
Inventory Reports	7		



APPENDIX B

LITIGATION DOCUMENT  
RETENTION POLICY

### **Litigation Document Retention Policy**

In light of the recent amendments to the Federal Rules of Civil Procedure (“FRCP”) which govern practice in certain federal courts, Muhlenberg College now has a heightened burden in connection with retention of records and documents<sup>5</sup> in its possession, including electronically stored information (“ESI”), and especially when the College is on notice of a potential claim or litigation. ESI encompasses a broad spectrum, and can be found not only on desktops or laptops, but also on instant messaging programs, Blackberries and other similar devices, websites, data recorders, and various other media. In order to ensure compliance with the College’s obligations under the FRCP, the College has implemented this Litigation Document Retention Policy. Under this Policy, the College is under a strict obligation to preserve, without deletion, all documents relevant to a *pending* or *reasonably foreseeable* claim or litigation.

A “**LEGAL HOLD**” of all relevant documents will be triggered immediately upon the College becoming aware of such a claim or litigation. When and if such a Legal Hold is triggered, the normal College document retention policies will be suspended and the College will communicate to you, as necessary, a new set of guidelines to ensure retention of all relevant documents, which guidelines will take precedence over the College’s standard document retention policies.

“Reasonable” anticipation of litigation arises when an organization is on notice of a credible threat that it will become involved in litigation, or anticipates taking action to initiate litigation. In order to assess whether litigation is reasonably anticipated, it is imperative that the College have notice of each potential dispute so that it may promptly investigate whether or not a Legal Hold should be triggered, and if so, identify and preserve all relevant information. *Information within the possession of its employees may be imputed to the College.* Accordingly, each employee must remain vigilant and report any information regarding any potential claim by or against the College as soon as possible upon becoming aware of such information. *Employees’ reporting obligations are broad in scope and will be triggered any time any employee has any indication that the College is or has the potential of becoming embroiled in any dispute which may lead to litigation.*

In the event any employee becomes aware of such information, the employee is required to give immediate written notice, preferably within 2 days, to senior management officials of any pending or reasonably foreseeable claim or litigation. Senior management officials will then meet and discuss the likely parameters and requirements of the Legal Hold with legal counsel. Senior management officials, with the aid of legal counsel, will promptly undertake a more detailed investigation as to the specifics of the dispute to determine: (1) any and all facts that may be “relevant” to that threat; and, (2) which departments the Legal Hold will affect.

Senior management officials will then promptly create a written report which discusses the scope of information that is reasonably relevant to the dispute and needs to be preserved in light of the nature of the issues raised in the matter and the amount in controversy, and identifies the persons who are likely to have relevant information. Simultaneously with the completion of the report, officials will provide the departments identified in the report with a clearly written preservation notice (the “**Legal Hold Notice**”). The Legal Hold Notice will describe in detail the recipient’s preservation obligations, including what information must be preserved and how the preservation must be accomplished. If you are the recipient of a Legal Hold Notice, a senior management official will promptly set up and hold a meeting with you to review the contents of the Legal Hold Notice and your obligations regarding the Legal Hold.

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<sup>5</sup> The definition of a “Document” includes paper and electronic or machine readable records, films, audio recordings, and video tapes.

APPENDIX C

ELECTRONIC  
COMMUNICATION POLICY

### **Electronic Communication Policy**

The electronic communication System at Muhlenberg College is to be used primarily for purposes consistent with carrying out the College's educational mission. Examples of this System include, but are not limited to, the central computing facilities, the campus-wide network, local-area networks, attached computers and printers, stored programs and data, electronic mail, newsgroups, access to the Internet, the College telephone facilities including voice mail, departmental networks, campus cctv, and the public computing facilities and related services, including Trexler Library computers. (Note: Above defines System, for subsequent use in the Policy).

This Policy applies to all Users of this System (including resources owned, leased by, subscribed to, or managed by Muhlenberg College) including, but not limited to, faculty and visiting faculty, staff, managers, students, guests of the management team, and external organizations and individuals accessing external services, such as the Internet and Library systems, via Muhlenberg's electronic communication system. (Note: Above defines User, for subsequent use in the Policy).

By using this System, Users agree to the guidelines contained herein. Electronic mail and Internet may be used for personal communication, but this may not take priority over intended business and academic uses. Priority for using this System will always be given to members of the College community. Because the College cannot guarantee the privacy of messages or documents stored on the System or transmitted through the System or through the Internet, use of the System for sending confidential or private personal information is discouraged. Users should be aware that electronic mail communications and voice mail communications can be a potential source of evidence in the process of attorney discovery in discrimination lawsuits or other litigation. (Note: Voice Mail should be treated the same as e-mail).

Users of the College's System should not disclose their passwords to others. Documents or information stored in the System should not be accessed by anyone other than the author or recipient, or by the College, as stated below.

General policy requirements applicable to the use of the System are as follows:

1. Offensive, harassing, defamatory, or otherwise inappropriate communication via the System is prohibited. (Note: Above would address use of Instant Messenger and other non-e-mail transmissions).
2. Use of the System is subject to all legal and College prohibitions against discrimination and harassment based on age, color, disability, gender, gender identity, national or ethnic origin, race, religion, sexual orientation, veteran status, or any other basis protected by applicable federal, state or local laws.
3. Obscene, objectionable or other offensive material, including material that may be interpreted as harassment by others, may not be viewed, downloaded, printed or transmitted via the System in public spaces.
4. System users are liable for any action or negligence that directly or indirectly results in adverse effects upon the System or its Users. The execution of computer programs intended to gain unauthorized access to, or make unauthorized use of, the System is prohibited. Users must abide by the terms of all software licensing agreements and copyright laws. Also, Users are prohibited from downloading software onto any Library or Computer Lab computer unless given prior approval by the Director of the Office of Information Technology or the Library Director.
5. Users of the System are obligated to respect the rights of others, the intellectual rights and the intellectual property rights of others when using these resources. Duplicating and/or distributing information, recordings, or images in violation of applicable copyright laws is not permitted.

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6. Unless granted proper authority, Users are forbidden to access, transmit or release any information or data of a confidential nature, secured through their position with the College, to a person not authorized to receive such information. Further, the Family Educational Rights and Privacy Act (FERPA) mandates that certain types of student information may not be disclosed and/or distributed to unauthorized persons. This includes information transmitted and stored on the electronic mail system. Additional information relative to the provisions of FERPA is available from the Dean of Students or the Registrar.
7. College policy prohibits acts that are wasteful of System resources. Examples include, but are not limited to: sending or forwarding chain letters; sending mass electronic mailings not directly pertinent to College business; creating unnecessary multiple jobs or processes; excessive uploading or downloading of large files, or, creating unnecessary output or printed material.
8. The College System may not be used for personal financial gain, inappropriate or illegal activity of any kind. Users may not download to, install upon, create links to, or otherwise place on the System any data or program which consists of any advertisements for commercial enterprises, without prior approval.
9. The campus electronic mail system exists primarily to facilitate business communications between individuals and specific groups. To the extent that there is excessive use of "Everyone Group" messages (or similar mass mailings) to numbers of individuals who, given a choice, would choose not to receive them, the effectiveness of the System is compromised. Such messages must be restricted to campus emergencies and urgent operational messages, notification of campus meetings and events, and notification of College-sponsored events or other events off-campus, which relate to the College's educational goals. Messages such as notice of lost and found articles, promotion of political causes, and listing of personal sale items should not be sent via the campus e-mail system. The ON CAMPUS faculty/staff newsletter and the campus MESSAGE BOARD are appropriate vehicles for lost and found and for sale items.
10. As is common in business and other organizations, it is the College's current practice that all information stored on this System, including the content of the electronic mail system and the content of the voice mail system, is normally copied daily to digital tape to provide a back-up copy in the event original records are damaged. These tapes are stored in a secure area where they are considered confidential and are retained for a period of four weeks. This means that electronic mail messages and voice mail messages deleted by an individual user subsequent to the College's daily backups may be retained for this period of time. After the four-week period, the tapes are normally re-used. The College may change these and other operational practices from time to time. (Note: Voice Mail should be treated the same as e-mail).

The College is the owner and administrator of this System. The College may exercise the right to access information stored on the System for business purposes such as retrieving College business-related information, troubleshooting problems, responding to complaints of misuse, and in order to comply with legal and regulatory interests. Where practical, efforts will be made to obtain express consent from the individual employee or student whose information is to be accessed. It is for these and other reasons that the College cannot guarantee the privacy of messages or documents stored on, or transmitted through the System.

Violations of these policies should be reported either to the Provost, the Dean of Students, the Vice President of Human Resources, or the Director of Campus Safety and Security. Violations could result in penalties imposed upon the User of the System. These penalties could include disabling of the User's account(s), student suspension, student expulsion, employee suspension or termination, termination of access to the System, or liability for expenses incurred by wasteful usage (see point 4 under Policy Requirements).

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The College maintains the right to monitor network use and discipline users, including faculty, staff members, managers and students, in accordance with human resource and electronic communication policy guidelines.

Note on Muhlenberg web pages (7/00): Under normal circumstances, links to commercial web sites that advertise and/or promote retail products are generally not allowed.

Any organization that is officially recognized by the Dean of Students' Office is eligible for its own listserv distribution list, effective Spring 2002. OIT is available for problems and issues arising with the technology, and is available to train officers to start up and maintain the list serve, but the sole responsibility for maintenance and updating information rests with the individual organizations and its officers.