



Operating Policy and Procedure

OP 10.002 Document Retention and Destruction Policy

DATE: June 1, 2025, with early adoption permitted on a department-to-department basis.

PURPOSE: This policy defines the process and procedures for the systematic review, retention and destruction of documents received or created in the transaction of the business of Kellogg Community College (“College”). The policy is designed to ensure compliance with federal and state laws, regulations and accrediting requirements, as well as administrative and Board of Trustees policies. The policy also is intended to eliminate accidental or innocent destruction of records, as well as to facilitate College operations by promoting efficiency and reducing unnecessary storage of documents.

REVIEW: This operating policy will be reviewed each June by the Document Retention and Destruction Team (“DRDT”), with revisions forwarded to the Board of Trustees through President’s Council, by the Office of the President.

POLICY/PROCEDURE

1. Policy

The College shall ensure that its records are preserved to provide documentation of the College’s history and to be retained for the periods of time necessary to satisfy the College’s business, legal, regulatory and accrediting obligations. Records shall be disposed of in accordance with an established record retention and disposition schedule. Certain records are permanent records and may not be destroyed. A record retention schedule shall be created for each department and approved by President’s Council in consultation with the affected departments. Annual review shall be completed in consideration of best practices and in accordance with applicable laws, regulatory and accrediting requirements.

Whereupon the College has actual notice of litigation or of a government investigation or audit, or has reason to believe that such events are likely to occur, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In the event of a litigation hold, all policies for the disposal of documents must be suspended with respect to those matters that are the subject of the hold. When possible, documents held under a litigation hold shall be retained in their original format and shall not be altered or tampered with.

For those departments that have one, a General Schedule (“Schedule”) for Local Government prepared by the Michigan DTMB (https://www.michigan.gov/dtmb/0,5552,7-358-82548_21738_31548-56101--,00.html#cu) shall be the standard governing schedule. The record custodian of each department is responsible for preparing a list of records used and maintained by the department and shall compare it to the documents listed in the record retention schedule as well as the DTMB Schedule. Any record that is not covered by the Schedule shall be submitted to the State for approval of a proposed retention period. A record not covered by an approved schedule cannot be destroyed without the authorization of an approved "agency-specific

schedule." Agency-specific schedules only address the unique records of the agency named on the schedule and may not be used by another agency. An agency-specific schedules always override a Schedule.

For departments that do not have a Schedule, the record custodian of each department is responsible for creating, reviewing, maintaining, complying and submitting an Agency-specific schedule to the State for approval on behalf of the department.

Permanent records shall be maintained in a secure fashion either electronically or in fireproof storage. Records retained electronically shall be backed up according to routine file maintenance procedures.

2. Scope

This Policy applies to all College records.

3. Definitions

- a. **Record:** A record is anything containing information reflecting College educational and business transactions regardless of format (i.e., paper, digital, photographic, recordings, etc.). The Michigan Freedom of Information Act (FOIA) (MCL 15.231-15.246) defines public records as recorded information “prepared, owned, used, in the possession of, or retained by a public body in the performance of an official function, from the time it is created.” Typical records include official publications, fiscal data, incoming/outgoing correspondence, meeting minutes, reports and student files.
- b. **Active Records:** Records are considered active when they are generally referred to once a month or are needed to support the current business activity of an office or division.
- c. **Inactive Records:** Records are considered inactive when they have not been needed for at least one year, or when their active period has passed.
- d. **Permanent Records:** Also known as archival records, permanent records have historical, administrative or research value to the College, and the College keeps them indefinitely.
- e. **Disposable Records:** Unless records (both active and inactive) have been defined as permanent or archival records, they should be destroyed according to the time period shown on the retention schedule. Inactive records should be securely stored until the end of the retention period. The list below describes items, in a typical office, that are not classified as records and therefore do not need to be categorized or maintained. These materials may be destroyed at any time if they are no longer needed by the office holding them.
 - i. Large quantities of duplicate materials and all duplicates of “official copies”
 - ii. Non-Kellogg Community College published magazines and newspapers
 - iii. Published reports produced by other entities
 - iv. Purchased data from other sources
 - v. Catalogues, journals or other printed matter created by other entities used for informational purposes
 - vi. Notes or working papers once a project is complete, unless they provide more complete information than the final report
 - vii. Other “[non-records](#)” are listed on the DTMB website, defining “non-record materials”.

- f. **Retention Schedules:** The College shall maintain a Records Retention and Destruction Schedule (“RRDS”) describing categories of records, providing a length of time they should be kept and instructions for disposal. State or federal law may determine the period that certain records must be kept. The RRDS also includes any special instructions related to disposal. Departments that deal with the documents listed in the retention schedule shall maintain applicable department-level procedures and associated retention schedules.
- g. **Retention Period:** The retention period defines the minimum required length of time for which a College office or department is responsible for maintaining records. Records may be stored longer than the retention period but not shorter than the minimum retention period. The retention period may be defined by the College or an external regulatory or legal authority.
- h. **Records Destruction:** Records destruction is defined as the physical or electronic destruction of a record after it has become obsolete. The method of destruction may be prescriptive in order to maintain required confidentiality.
- i. **Record Custodian:** A record custodian is an administrative designee who has authority over a particular business practice that requires record retention. Administrators serving in a custodial capacity have responsibility for ensuring effective implementation of this policy in their area of authority and shall develop appropriate department-level procedures for retention.
- j. **Litigation Hold:** A litigation hold is a communication issued as the result of current or anticipated litigation, audit, government investigation or other similar matter that suspends the normal process of retention and disposal of College records.

4. **Document Retention and Destruction Team Annual Procedure**

- a. Annually in June, the DRDT shall review the policy for possible updates and disseminate instructions to each department’s Record Custodian to perform their own annual review of the Schedule. The DRDT will obtain confirmation from each Record Custodian that their respective department has complied with the requirements of this policy.
- b. Department Record Custodians shall review records and forms to determine whether these records and forms are adequate and appropriate for the department’s requirements, which includes identifying special circumstances that may necessitate changes to the retention period.

5. **Roles and Responsibilities**

- a. **Document Retention and Destruction Team:** The group of employees appointed by the College President to oversee the administration of this policy.
- b. **Record Custodian:** Each department’s appointed employee responsible for administration of this policy on behalf of their department.

6. **Persons/Departments Affected:** All College employees and departments, the KCC Foundation, and the Board of Trustees.

7. **Related Information**

- a. https://www.michigan.gov/dtmb/0,5552,7-358-82548_21738_31548-56101--,00.html#cu
State of Michigan General Retention schedule for Local Government
 - b. https://www.michigan.gov/dtmb/0,5552,7-358-82548_21738_31548-96228--,00.html State of Michigan instructions and forms used to develop agency-specific schedules
 - c. https://www.michigan.gov/documents/dtmb/rms_gsfaq_640108_7.pdf
Frequently Asked Questions about General Schedules
 - d. [College Records Storage and Disposition Guidelines](#)
 - e. [Records Retention and Destruction Schedule](#)
8. **Right to Change Policy.** The College reserves the right to interpret, change, modify, amend, or rescind this policy, in whole or in part, at any time, without prior notice or the consent of the employee.
9. **Approval Date:** April 17, 2024
10. **Past Revisions** – not applicable.