



## UNIVERSIDAD ANA G. MÉNDEZ

### POLICY FOR THE CONSERVATION AND DISPOSAL OF STUDENT'S FILE DOCUMENTS

**Policy Number: 09-2015**

**Effective date: July 1, 2015**

\_\_\_\_ New  
\_\_\_\_ Amendment Executive Order No. \_\_\_\_\_ dated \_\_\_\_\_  
x Policy Amendment No. **02-2011** dated **April 1, 2015**

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#### I. PREAMBLE

This Policy for the Conservation and Disposal of Student File Documents (hereinafter the "Policy") establishes and describes the general guidelines that will govern all preservation and disposition of official documents in the student file.

#### II. OBJECTIVES

- a. To establish the institutional requirements for the conservation and disposal of documents and official records of the student's file, including their preservation, organization, use, security, filing, and eventual disposal.
- b. To list the general responsibilities of the student service units, their officers, agents, and employees, regarding the handling, preservation, conservation, and disposition of documents.
- c. To provide processes and protocols to supervise, execute, and administer the provisions of this Policy.
- d. To establish the creation, conservation, and disposition of documents.

#### II. SCOPE

This policy applies to all employees involved in the process of analysis, evaluation, preservation, and disposition of documents from student files. It takes into consideration issues of vital importance regarding the handling and disposition of documents, among these:

- a. The preservation and conservation of data and information of a historical nature.
- b. Compliance with the legal requirement imposed on the institution by federal and state laws and regulations, as well as by the accrediting agencies.
- c. To avoid the disposition of documents pending a legal process before a judicial or administrative forum, without prior authorization or recommendation on the matter from the Legal Advisor.

- d. To comply with all state or federal law or regulation requirements on audits conducted by state or federal agencies, as well as UAGM departments or offices.
- e. To maximize the use and occupation of the spaces and places for storing documents, as well as the terms to be established for the period of conservation of each of these.

The Policy is adopted and implemented in accordance with the laws of the Commonwealth of Puerto Rico, the Federal Government of the United States of America, and the state, federal, and accrediting agencies that regulate the matters covered by the document. The Policy may impose limitations or restrictions on matters that are not specifically legislated or regulated by law or any state or federal regulation. In case of contradiction with any law or regulation, the law and regulation will prevail. This Policy will not establish restrictions, limitations, or processes other than those already existing in laws or regulations related to the confidentiality of documents.

The Policy will not be interpreted or implemented when it results in inconsistencies or contravention with the contractual obligations contracted by the institution.

The Policy will be applied to any document or file generated or created individually or jointly, that is kept or stored by the institution. This includes their enclosures regardless of the format or medium in which they are written, generated or stored, including electronic formats. No category of document is excluded from the application of this Policy, unless the Policy, law, or regulation itself exempts it.

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### III. GENERAL DISPOSITIONS

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#### **Authorization**

No document in the student file may be destroyed, sold, transferred, donated, converted, altered, or delivered without the prior authorization required by this Policy, or any other applicable law or regulation. Any person, officer, or department that is interested in carrying out any of said acts related to documents must contact the Registrar Office for the proper orientation and authorization on the matter, including the existence of a specific itinerary or provision, which in accordance with this Policy is applicable to the request. The required authorization will be applicable even when an applicable itinerary establishes periods for the disposition of documents that are broader than those established by law or regulation. Authorization will also be mediated when the time in which the document was created exceeds the term for its disposition according to the itinerary or this Policy. In all procedures regarding the disposition of documents, the required authorization will mediate, as provided in this Policy and, specifically, in this section.

The institution will provide all forms and instructions necessary to comply with the provisions of this Policy.

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### IV. DEFINITIONS

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**File Administration:** The management and organization of information and documents, the process for filing and classifying them, and the equipment or facilities used for said processes and to preserve them.

**Employee:** All faculty members, teaching and non-teaching, part-time, temporary, fixed-term, and full-time personnel, those under any other form of contract with UAGM, who receive remuneration from UAGM for performed work.

**Digitalization:** It is the way in which a physical document on paper is converted to electronic (image) so that a technological medium (computer) can recognize it.

**Disposition:** Term used to identify the process or regulation that will be used once the period of conservation of a document expires. Disposal may include archiving, transferring, or destructing the document.

**Document or Record:** All written material in the form of a book, paper, letters, photographs, tapes, microfiches, copies, recordings, maps, images, or any other material, information or data on any recording or data storage medium, including materials created or written in digital or electronic form.

**Internal Documents:** Documents generated by a UAGM employee, official, department, or office for the exclusive use of the UAGM, or to carry out functions or procedures delegated or authorized by UAGM as part of its functions and responsibilities.

**Legal Documents:** Documents that contain information on the authority to appear as a party in business and carry out financial transactions, as well as information on matters related to legal, extrajudicial, judicial, administrative, and quasi-administrative processes.

**Original Documents:** Any original document or copy in which the original of what is written, typed or printed therein is reproduced. Photocopies or multiple copies are not considered originals for the purposes of this Policy.

**Permanent Documents:** Documents that will be stored for an indefinite term, or at least, for a period of one hundred (100) years or that establish an institutional property title.

**Digital Student File:** Integration and digitalization (electronic conversion) of a document or group of enrollment documents, courses, degrees, grades, lodging, admissions, financial aid and any other document that belongs to the student affairs component and the Registrar Office.

**Physical Files of Students:** Documents generated by enrollment, courses, degrees, grades, lodging, admissions, financial aid, and any other physical document that belongs to the student affairs component and the Registrar Office.

**Indexing:** Process of incorporating the digital image of the document into the student's digital file.

**Conservation Period:** Period of conservation and custody of all documents or files of the institution. Said period will take into account the purpose of creating the document, legal or contractual requirements, fiscal or administrative matters, use of government agencies, audits or the importance and materiality of the information or document.

**Central Digitization Unit:** Department in charge of the administration of the digital file of the students and the processing of documents to be digitized.

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## V. POLICIES

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- A. Student digital files are classified as active and inactive. Active files are those corresponding to students who are officially enrolled in the institution and its Additional Locations. The files of students who have completed studies or stopped studying at least one semester are considered inactive.
- B. The student's digital file includes four main components: Admissions, Financial Aid, Registrar, Disciplinary Council, and any other category defined by the Vicepresidency of Academic Affairs.
- C. Requests for access to the components of the student's digital file will be approved by the Directors of the student service offices and the Registrar.
- D. The personnel of the student service offices and the applicants authorized by law will maintain the confidentiality of all documents included in the institution's student files.
- E. Inactive digital files will be kept for the period established in the itinerary for the preservation of documents in the student file, which is incorporated into this Policy.
- F. Inactive physical files that have not been digitized but that have already complied with the conservation period established in the Conservation Itinerary for Documents in the Student File may be disposed of using the mechanisms provided in this policy.
- G. All documents required for admission will be digitized during the student's admission process and will be returned if the student is present. If the documents are received by other means such as regular mail, they will be digitized and disposed of without returning them to the student.
- H. The digital files of inactive students who enrolled before January 1990 that are not in the student databases will be disposed of after having digitized the admission applications, credit transcripts or their equivalents.
- I. All active or inactive student files that are used in legal or investigation processes will be transferred and guarded by the Registrar during the term in which the case is active.
- J. The Confidentiality Agreement and the UAGM Code of Professional Ethics is made part of this Policy, this being the institutional regulation in everything related to the disclosure and delivery of information and documents that may or may not be identified as confidential, official, or with any other designation, except those that are expressly excepted by said agreement.
- K. The following policy applies to the digital student files of the US centers: *File Retention and Disposition Policy – UAGM Branch Campuses* (see attachment).

### Non-compliance

UAGM employees who incur in violations of this Policy and the itineraries for disposition and preservation of documents will be subject to the application of corrective actions, which may include anything from a written warning, suspension of employment and salary, to separation from employment.

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## VI. PROCEDURES

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- A. **Collection and Preservation of Documents in the Admissions and Recruitment Office**
  - 1. Designated officials collect the necessary documents for a student's admission and create the electronic file in the student database system.

2. The admissions and recruitment advisors will be responsible for validating the authenticity of the documents submitted by the student and will provide follow-up to the documentation that is pending to complete the digital file. The personnel in charge will be responsible for verifying that all the documentation complies with the established requirements and that the documents are duly completed.
3. Once the digital admission file is completed, it will be available to the Registrar's Office.

**B. Collection and Preservation of Documents at the Study Financing Office**

1. The Study Financing Officers receive from the students the necessary documents for the different grant and loan procedures. The digital file must comply with all the documentation required for verification, loan approval, work study assignment, and/or any other financial aid program requested and available to the student.
2. The student's financial assistance documents will be collected by the officers in charge in order to complete the student's digital file. The collection may vary according to the mechanisms that allow obtaining the documentation through electronic means or enable the documents to be digitized and returned to the student.
3. The Study Financing Officers evaluate the documents submitted by the student and validate that they meet the requirements of each financial aid program requested.
4. The Study Financing Officers will be responsible for following up on the pending documentation to complete the digital file.

**C. Collection and Conservation of Documents at the Registrar's Office**

1. The Registrar's officers receive the necessary documents to attend the different student procedures, according to the needs and procedures applicable to this office. Each procedure must comply with all the required documentation.
2. The personnel in charge will be responsible for verifying that all the documentation complies with the established requirements and that the documents are duly completed. The Registrar's officers will be responsible for following up on the pending documentation to complete the student procedures.
3. Every day the Registrar's student documents will be collected by the Central Digitization Unit. That collection may vary according to the mechanisms that allow obtaining the documentation through electronic means.

**D. Collection and Conservation of Documents in the Additional Locations**

1. The staff in charge receives the necessary documents to attend the different student procedures, according to the needs and procedures applicable to these units. The collection may vary according to the mechanisms that allow obtaining the documentation through electronic means or enable the documents to be digitized and returned to the student.

2. The personnel in charge will be responsible for verifying that all the documentation complies with the established requirements and that the documents are duly completed. This staff will follow up on the pending documentation to complete the digital file.
3. The staff in charge evaluates the documents submitted by the student.
4. The designated person in each area will digitize the documents and submit them electronically to the Central Digitization Unit for verification and the creation of the student's digital file.

#### **E. Collection and Conservation of Documents in the Central Digitization Unit**

1. The physical documents generated in the student services and the Registrar Offices units will be collected by the Central Digitization Unit. The officers of said unit will carry out the process of validation, cleaning, removal of staples, digitization, and indexing.
2. Once verified and digitized, the documents will be arranged, according to Section VI, Document Disposition, of this Policy.
3. The physical documents of the Additional Locations and the Systemic Schools are received by the Central Digitization Unit. The officers of said unit will carry out the electronic verification process and subsequent disposition of the physical document. The digitized documents will be available to the staff of the student services units and registrar in the Additional Locations.
4. The Central Digitization Unit will keep a record of the files that for any reason are under investigation or legal process. Access to these digital files will be granted by the Registrar.
5. The Central Digitization Unit will be responsible for managing and ensuring compliance with this policy.

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### **VI. DISPOSAL OF DOCUMENTS**

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1. The Central Digitization Unit officers will keep a record of the active files and the classification of the documents that will be disposed of.
2. The physical documents of the active and inactive files will be disposed of once they have been digitized. The disposal will be through the grinding method.
3. The disposal will take place after the approval of the Registrar as applicable and in coordination with the supervisor of the Central Digitization Unit.
4. The digital documents will be disposed of in accordance with the conservation time established in the Conservation Itinerary for Documents in the Student File.
5. Documents with mixed retention periods will be retained for the longest applicable retention period.
6. The disposal of documents will be possible under strict compliance with the Conservation Itinerary for Documents in the Student File.

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## **VII. RESPONSIBILITIES**

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### **A. Assigned Personnel to Student Service Offices**

1. Will receive the necessary documents that make up the student's digital file.
2. Will verify that all documentation complies with the established requirements and that the documents are duly completed.
3. Will follow up on pending documentation to complete the digital file.
4. Will evaluate the documents submitted by the student and will process the different requests and processes.
5. Will maintain the confidentiality of all physical and digital student documents.

### **B. Student Service Officers and staff in charge of the Additional Locations**

1. Will receive the necessary documents for the different student procedures.
2. Will verify that all the documentation complies with the established requirements and that the documents are duly completed.
3. Will follow up on pending documentation to complete the digital file.
4. Will evaluate the documents submitted by the student and will process the different requests and processes. Will submit the electronic documents to the Central Digitization Unit using the equipment provided for this process.
5. Will maintain the confidentiality of all the physical and digital documents of the students.
6. Will submit the physical documents to the Central Digitization Unit so that they can be verified and disposed of.

### **C. Employees assigned to the Central Digitization Unit**

1. Will ensure compliance with any legislation, ruling, or regulation required by law for the management, conservation, and disposition of documents.
2. Shall ensure compliance with this Policy and UAGM internal regulations related to the management, conservation, and disposal of documents.
3. Will review and recommend, in conjunction with the designated officials, the itineraries for the conservation and disposition of documents in the digital file, as well as changes in technology, institutional needs, or any other factors that must be taken into account for the efficient administration and operation of this Policy.
4. Will manage and safeguard the documents of the student's digital file and the physical verification documents.
5. Will ensure that the documents or digital files are organized in an efficient and accessible manner.
6. Will maintain a record of active files and classify the documents that will be disposed of.
7. Will ensure that the electronic documents that are generated in the Additional Locations are available for the operation of the officers assigned to the different student service units. This will ensure that student services staff can complete the paperwork electronically.
8. Will receive, process, and maintain the digital file of the Additional Locations.
9. Will manage and coordinate the disposition of inactive documents in accordance with the Conservation Itinerary for Documents in the Student File and will determine, before their destruction, if they should be kept or sent to any agency, office or department.

10. Will keep a record of the documents and digital files that have been disposed of.
11. Will provide inventories of the institution's student files and assist the student service units in complying with this Policy and its schedules.
12. Will create, manage, and review operation manuals, which have the basic guidelines to guarantee the security of the Original Documents or Files.
13. Will train new employees in the digitization system processes.

#### **D. Registrar**

1. He will authorize the disposition of documents from the physical and digital student record under his supervision after going through the quality control process.
2. It will monitor compliance with this Policy and provide guidance on its content, scope and extension.
3. Supervise the Central Digitization Unit.

#### **E. Directors of the Offices for Student Services**

1. Will authorize access to the file component from your office.
2. Will maintain a record of requests for review of digital files made by students, auditors, or authorized officials.

In the event of any inconsistency or ambiguity in relation to the meaning of any word or phrase in the English translation, the Spanish text shall prevail.