

BURRELL COLLEGE OF OSTEOPATHIC MEDICINE

STANDARD OPERATING PROCEDURES

Records Retention		SOP #: GA.004.02
Effective Date	8/23/19,	
Last Revision/Review	8/23/19, 11/25/19, 6/27/2023	

1. Purpose

Record Retention and Data Custodian Matrix

2. Related Policy/Authority

New Mexico Administrative Code (NMAC) - <http://164.64.110.134/nmac/home>

BCOM Retention of Institutional Records Policy - B2090 –<https://burrell.edu/policy-b2090/>

3. Faculty/Staff Responsibilities

All Department Heads

4. Definitions/Abbreviations

NMAC – New Mexico Administrative Code

Refer to CFR §200.334

5. Procedural Steps

1. A data custodian matrix will be reviewed and updated annually by Enrollment Services, Student Affairs, Human Resources, Faculty Affairs, Finance, Curriculum Committee Chair, Assistant Dean of Student Assessment, and the Offices of the Dean and President.
 - a. The matrix contains a minimum retention per NMAC, the original source of the record, the official system of record, and the data custodian.
2. Each department head is responsible for the retention and disposal of records in accordance with NMAC and the data custodian matrix (attached).
3. The Office of Research and Scholarly Activities will follow CFR §200.334 for all federal awards. Federal awards must be retained for a period of three years from the date of submission of the final expenditure report or, for the Federal awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient.

6. Reports/Charts/Forms/Attachments/Cross References

7. Maintenance

The matrix shall be reviewed annually by department heads.

8. Signature

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Approved by	6/27/2023
Department Head of Enrollment Services and Institutional Effectiveness	Date

9. Distribution List

Internal/External

10. Revision History

Revision Date	Subsection #	Summary of Changes	New/Cancellation/Replacement Procedure? (if applicable)	Approval Date
11/25/2019		Updated Data Custodian Matrix		11/25/2019
6/27/2023	5	Added information about research federal grant record retention		6/27/2023

Office of the President and Dean

Record	Minimum Retention Period	Original Source					Official System of Record	Custodian of Record				
		AACOMAS	AMP	GP/HR	CAMS	External Source/ Other	Data Warehouse	Registrar	Financial Aid	Office of the Dean/President	Office of Compliance	HR Director
Articles of Incorporation and Owner Information	Permanent					X	X			X		
Board of Trustees Bylaws	Permanent					X	X			X		
Minutes of Board of Trustees Meetings	Permanent					X	X			X		
Minutes of Board of Trustees Committee Meetings	Permanent					X	X			X		
Licenses	Active + 6 Years					X	X			X		
Policy Statements	10 Years						X			X		
Campus Clery Reports-Annual	4 Years					X	X			X		
Grievance Records/Title IX	7 Years from Date of Closed File					X	X				X	X
IPEDS	10 Years					X	X			X		
VA Reporting	10 Years					X	X	X				
Institutional Accreditation Files	Permanent					X	X			X		
Program Accreditation and Certification Files	Date of Inspection + 10 Years									X		
Course Catalogs	Permanent					X	X	X		X		
Applicant Statistics	5 Years	X					X			X		
Enrollment Statistics	Permanent		X				X			X		
Residency Placement Statistics	Permanent					X	X			X		
Board Exam Statistics	Permanent					X	X			X		
Demographic Statistics	Permanent		X	X			X			X		

Enrollment Services

	Record	Minimum Retention Period	Original Source								Official System of Record				Data Custodian				Cohort Status Req. - As			
			Student	AACOMAS (WebAdmit)	External Source (e.g. Parchment, NBOME)	CAMS	AMP	FAFSA	BCOM Committee (e.g. SPC)	ExamSoft	Office of the Dean/CAO or President/CEO	AMP	Physical File	CAMS	Data Warehouse	Admissions	Registrar	Student Affairs	Financial Aid	2020	2021	2022
Student Academic Record	Admission Application (AACOMAS or BEAR)	Permanent	X	X							X				X				R	R	R	R
	Qualifying Transcript with degree conferred	Permanent		X	X						X				X				R	R	R	R
	Admission Agreement	Permanent					X				X				X				R	R	R	R
	Prerequisites	Permanent					X				X				X				R	R	R	R
	Admissions Checklist	Permanent					X				X				X				R	R	R	R
	Minimum Technical Standards	Permanent					X				X				X				R	R	R	R
	Background Check and Drug Screen	Permanent					X				X				X				R	R	R	R
	Financial Responsibility	Permanent					X				X				X				R	R	R	R
	Immunizations	Permanent					X				X				X				R	R	R	R
	Enrollment Agreement	Permanent					X				X				X				NA	NA	NA	R
	Financial Obligation	Date of Last Attendance + 5 Years					X				X				X				R	R	R	R
	Board Exam Scores	Date of Last Attendance + 5 Years					X				X				X				R	R	R	R
	COMLEX Level 1	Date of Last Attendance + 5 Years					X				X				X				R	R	R	R
	COMLEX Level 2 CE	Date of Last Attendance + 5 Years					X				X				X				R	R	R	R
	COMLEX Level 2 PE	Date of Last Attendance + 5 Years					X				X				X				R	R	R	R
	USMLE Step 1	Date of Last Attendance + 5 Years					X				X				X				AA	AA	AA	AA
	USMLE Step 2 CK	Date of Last Attendance + 5 Years					X				X				X				AA	AA	AA	AA
	USMLE Step 2 CS	Date of Last Attendance + 5 Years					X				X				X				AA	AA	AA	AA
	USMLE Step 3	Date of Last Attendance + 5 Years					X				X				X				AA	AA	AA	AA
	Grade Change Request	Permanent								X	X	X			X				AA	AA	AA	AA
	Degree Audit	Permanent					X				X				X				R	R	R	R
	Current BCOM Transcript	Permanent					X				X				X				R	R	R	R
	Citizenship	Permanent		X	X						X				X				AA	AA	AA	AA
	Deferment Acceptance	Permanent		X							X				X				AA	AA	AA	AA
	Withdrawal/Suspension	Permanent		X					X	X	X				X				AA	AA	AA	AA
	Leave of Absence	Permanent		X							X				X				AA	AA	AA	AA
	Appeal Records	Permanent		X							X				X				AA	AA	AA	AA
	Return from Leave	Permanent		X							X				X				AA	AA	AA	AA
	Name Change Request	Permanent		X							X				X				AA	AA	AA	AA

Enrollment Services									
	Record	Minimum Retention Period	Original Source			Official System of Record	Data Custodian	Cohort Status Req. - As	
			Student	AACOMAS (WebAdmit)	External Source (e.g. Parchment, NBOME)				
			CAMS	AMP	FAFSA	BCOM Committee (e.g. SPC)	ExamSoft	Office of the Dean/CAO or President/CEO	
						AMP	Physical File	CAMS	
							Data Warehouse	Admissions	
							Registrar	Student Affairs	
							Financial Aid	2020	
								2021	
								2022	
								2023	
Accepted but not Entering Students NM	AACOMAS Application for Admission	Application Term + 1 Year	X				X	X	R R R R
	BEAR Application for Admission	Application Term + 1 Year	X	X			X	X	AA AA AA AA
	Letters of Recommendation	Application Term + 1 Year	X				X	X	R R R R
	Acceptance letters	Application Term + 1 Year	X				X	X	R R R R
	Student Correspondence	Application Term + 1 Year	X				X	X	R R R R
Student Transcripts	Application Term + 1 Year	X				X	X	R R R R	
Accepted but not Entering Students Melbourne (FL)	AACOMAS Application for Admission	Application Term + 5 Years	X				X	X	R R R R
	BEAR Application for Admission	Application Term + 5 Years	X	X			X	X	AA AA AA AA
	Letters of Recommendation	Application Term + 5 Years	X				X	X	R R R R
	Acceptance letters	Application Term + 5 Years	X				X	X	R R R R
	Student Correspondence	Application Term + 5 Years	X				X	X	R R R R
Student Transcripts	Application Term + 5 Years	X				X	X	R R R R	
Other	Transcript Requests	4 Years		X			X	X	AA AA AA AA
	FERPA Requests	Date of Graduation+ 1 Year	X				X	X	AA AA AA AA
	Other Admissions Related Documents	TBD by Department							AA AA AA AA
	Application for Graduation Date of Graduation and Degree Awarded	Date of Last Attendance + 2 Years		X			X	X	R R R R
	Official College Catalogs	Permanent		X			X	X	R R R R
	Official College Syllabi	Permanent				X	X	X	R R R R
Financial Aid	FAFSA Financial Aid Awards	Permanent			X		X	X	AA AA AA AA
	Scholarship/Grant Awards	Date of Last Attendance + 5 Years		X			X	X	AA AA AA AA
	Financial Aid Transcript of Awards	Permanent		X			X	X	AA AA AA AA
	Lender's Name and Address	Permanent		X			X	X	AA AA AA AA
	Entrance Counseling/Exit Counseling Documentation	Permanent		X				X	AA AA AA AA
	Student Loan History (Eligibility Documents, Return of Title IV Documents)	Permanent		X			X	X	AA AA AA AA
	Financial Aid Records Never Paid because Student Didn't Enroll	1 Fiscal Year after financial aid awarded without enrollment		X			X	X	AA AA AA AA

Student Affairs

Record	Minimum Retention Period	Original Source				Official System of Record			Data Custodian	Cohort Status Req. - As Applicable - N/A					
		Student	BCOM Committee (e.g. SPC)	External Source	Data Warehouse	Castle Branch	Safe Colleges	Acuity		Physical File and/or Data Warehouse	Admissions	Registrar	Student Affairs	2020	2021
Student Immunization Records	Permanent	X				X				X		R	R	R	R
Student Background Checks	Permanent			X		X				X		R	R	R	R
DOH Fingerprinting	Permanent			X		X				X		R	R	R	R
Drug Screens	Permanent			X		X				X		R	R	R	R
Student Health Insurance Verification	Last Date of Attendance + 1 Year	X				X					X	R	R	R	R
Computer Device Agreement	Permanent			X				X		X		R	R	R	NA
Honor Code Acknowledgement	Permanent			X				X		X		R	R	R	R
Student Handbook Acknowledgement	Permanent			X				X		X		R	R	R	R
Physican/Patient Relationship Form	Permanent			X				X		X		R	R	R	R
Student Accommodation Requests/Information	Permanent	X						X			X	AA	AA	AA	AA
Academic Counseling Records	Permanent			X				X		X		AA	AA	AA	AA
Career Counseling Records	Permanent			X				X		X		R	R	R	R
Code of Conduct Investigation/Resolution Information	Permanent		X					X			X	AA	AA	AA	AA
Student Compliance Training	Date of Last Attendance + 7 Years	X						X			X	R	R	R	R
Student Government Bylaws	Close of Fiscal Year + 5 Years										X	NA	NA	NA	NA
Medical Student Performance Evaluations	Permanent			X				X		X		R	R	R	R
Other Student Affairs related Documents	TBD by Dept.				X			X		X		NA	NA	NA	NA

Human Resources

Record	Minimum Retention Period	Original Source	Official System of Record	Data Custodian
		Applicants Employee External Source/Other	GP / HR/Greenshades Data Warehouse	Office of the Controller/Finance HR
Job Announcements and Advertisements	1 Year		X	X
Employment Applications – Not Hired	4 Years	X		X
Background Investigation Results – Not Hired	4 Years	X		X
Resumes-Not Hired	4 Years	X		X
Letters of Recommendation-Not Hired	4 Years	X		X
Employment Applications and Resumes	Date of Last Employed + 7 Years	X		X
Background Investigation Results	Date of Last Employed + 7 Years	X		X
Resumes	Date of Last Employed + 7 Years	X		X
Letters of Recommendation	Date of Last Employed + 7 Years	X		X
Academic Transcripts for Faculty	Date of Last Employed + 7 Years	X		X
Wage or Salary Information	Date of Last Employed + 7 Years		X	X
Payroll Deductions	Date of Last Employed + 7 Years	X		X
W-4 Form	Date of Last Employed + 7 Years	X		X
I-9 Forms	Date of Last Employed + 7 Years	X		X
Garnishments	Date of Last Employed + 7 Years		X	X
Beneficiary Designations	Date of Last Employed + 7 Years	X		X
Emergency Contacts	Date of Last Employed + 7 Years	X		X
Medical Records – Subject to HIPPA	Date of Last Employed + 7 Years	X		X
Promotions	Date of Last Employed + 7 Years		X	X
Exempt Leave Reports	Date of Last Employed + 7 Years	X	X	X
Employee Evaluations	Date of Last Employed + 7 Years		X	X
Personnel Actions	Date of Last Employed + 7 Years		X	X
Disciplinary Warnings and Actions	Date of Last Employed + 7 Years		X	X

Human Resources

Record	Minimum Retention Period	Original Source	Official System of Record	Data Custodian
		Applicants Employee External Source/Other	GP / HR/Greenshades Data Warehouse	Office of the Controller/Finance HR
Layoff or Termination	Date of Last Employed + 7 Years	X	X	X
Accident/Injury Reports	Date of Last Employed + 7 Years	X	X	X
Current and Superseded Job Descriptions	Date of Last Employed + 7 Years	X	X	X
Retirement Contributions	Date of Last Employed + 7 Years	X	X	X
Disability Records	Date of Last Employed + 7 Years	X	X	X
Staff Contracts	Date of Last Employed + 7 Years	X	X	X
Faculty Contracts	Date of Last Employed + 7 Years	X	X	X
Employee Compliance Training (HIPPA, Title IX, etc.)	Date of Last Employed + 7 Years	X	X	X
Time Cards/Sheets	Date of Last Employed + 7 Years	X	X	X
Benefit Plan Documents	Permanent	X	X	X
Employee Handbooks (superseded)	10 Years	X	X	X
Correspondence	Date of Last Employed + 7 Years	X	X	X
W-2 Forms	10 Years	X	X	X
Forms 5500	10 Years	X	X	X
Workers Compensation Quarterly Reports	10 Years	X	X	X
Workers Compensation Audit Data and Reports	10 Years	X	X	X
CMS/Medicare Reports	5 Years	X	X	X

Finance

Record	Minimum Retention Period	Original Source		Official System of Record		Data Custodian
		Controller	Clinical Education	External Source	CAMS	GP / Finance
Account Transfers	3 Years from date audit report released	X		X		X
Accounting Reports	1 Year from date audit report released	X			X	X
Accounts Payable	6 Years from date audit report released.	X			X	X
Accounts Reivable	6 Years from date audit report released.	X		X	X	X
Annual Budget	Permanent, transfer to archives when no longer needed for reference	X		X	X	X
Audits & Compliance-General	5 Years from date file closed	X		X	X	X
Bank Relationship	3 Years from the close of the fiscal year in which filed closed	X		X		X
Calendars & Schedules	1 Year from close of calendar year in which created	X			X	X
Collections	3 Years from date audit report released	X			X	X
Donations	3 Years from date audit report released	X			X	X
Educational Financial Aid (Controller's office)	3 Years from the date file closed	X			X	X
Exemptions	1 Year from close of calendar year in which file created	X		X	X	X
Financial Audits	3 Years from the close of the fiscal year in which file created	X		X	X	X
Fixed Assets	3 Years from date audit report released	X			X	X
Fund Management	3 Years from date audit report released	X		X	X	X
Inventories	3 Years from date audit report released	X			X	X
Investments	6 Years from date file closed	X		X	X	X
Investments: Statements and Reports	3 Years from the date file closed	X		X	X	X
Journal Entries	3 Years from date audit report released	X			X	X
Ledgers	3 Years from date audit report released	X			X	X
Payroll Taxes	10 Years from close of calendar year in which created	X			X	X
Reconciliations and Balancing	3 Years from date audit report released	X		X	X	X
Statements and Reports-Bank Administration	3 Years from date audit report released	X		X	X	X
Surplus and Disposal	3 Years from date audit report released	X		X	X	X

Finance

Record	Minimum Retention Period	Original Source		Official System of Record		Data Custodian
		Controller	Clinical Education	External Source	CAMS	GP / Finance
Tax	10 Years from close of calendar year in which file closed	X				X
Tax Assessments	10 Years from close of calendar year in which file closed	X		X	X	X
Unclaimed Property	10 Years from close of calendar year from date of final disposition of property	X		X	X	X
Valuations	10 Years from close of calendar year in which file closed	X		X	X	X
Valuations-Historical	Permanent, transfer to archives five years from close of calendar year in which file created	X		X	X	X
Vendor Management	3 Years from the date file closed	X	X		X	X
Grants (awarded directly to BCOM and when BCOM is a subcontractor to awarded organization)	Grant End date + 5 Years	X		X	X	X
Contracts that have consideration	Contract end date + 6 Years	X		X	X	X
Donor Records (only given directly to BCOM)	Current Year + 5 Years			X	X	

Other

	Record	Minimum Retention Period	Original Source	Official System of Record	Data Custodian
			Student External BCOM Committee (e.g. SPC)	ExamSoft Capri GP Finance Qualtrics Physical File or Data Warehouse Asst. Dean of Student Assessment Director of Clinical Education Controller Asst. Dean of Faculty Affairs Curriculum Committee Chair Asst. VP of Administration Director of Anatomical Lab Assistant Dean for Research	
Assessments	Course Assessments	End of Calendar Year Given + 2 Years	X	X	X
	Student Evaluation of Courses	End of Calendar Year Given + 2 Years	X	X	X
Curriculum Committee	Curriculum Related Documents -course calendars, course reports, course change requests, other course documents	End of Term + 5 Years	X	X	X
Faculty Affairs	Student Evaluation of Faculty	End of Calendar Year Given + 2 Years	X	X	X
	Appointment Files (CV, Transcript, Appt. Letter, Board Cert/Board Eligibility, Med License)	Date of Last Appointment + 7 Years	X	X	X
	Promotion and Evaluation Files	Date of Last Employed + 7 Years	X	X	X
Clinical Education	Preceptor Vendor Management	3 Years from date file closed	X	X	X
	Affiliation Agreements	TBD by Department	X	X	X
Facilities	Inspections: Fire/Facility	Date of Inspection + 5 Years	X	X	X
Anatomical Laboratories	Orientation to the Gift / Lab Access Training	End of Academic Year + 2 years	X		X
	Anatomic Imaging & professionalism forms	End of Academic Year + 2 years	X		X
	Whole body donor information forms	Date of receipt + 10 years*	X		X
	Anatomical materials inventory	Permanent record - evolving & kept current as per TSAB and FAB policy.		**	X
Research	Financial records, supporting documents, statistical records, and all other records for federal awards	Date of Submission of final expenditure report + 3 years			X