

Confidential Shredding

If you plan to purge files or throw out documents, remember that many documents contain confidential information and should be disposed of properly. **Proper disposal does not include recycling. Proper disposal must be done by shredding or placing documents into a confidential lock bin.** A list of where confidential lock bins are located on campus is available at <http://facilities.binghamton.edu/confshred.htm>.

What is considered sensitive information that requires shredding before disposal?

Sensitive information is generally any data that can be tied directly to an individual and that by itself, or coupled with other data, could put that individual's identity, financial well-being or reputation at risk. There are a number of laws regulating what is considered sensitive information:

NYS Information Security Breach and Notification Act

- Social Security Number;
- driver's license number or non-driver identification card number; or
- account number, credit or debit card number, in combination with any required security code, access code or password that would permit access to an individual's financial account

NYS Disposal of Personal Records Law

Personal identifying information includes personal information in combination with a Social Security Number, driver's license number or non-driver identification number, mother's maiden name, financial services account number or code, or debit card or ATM card number or code.

NYS Personal Privacy Protection Law

The term "personal information" means any information concerning an individual which, because of name, number, symbol, mark or other identifier, can be used to identify that individual.

The Family Educational Rights and Privacy Act (FERPA)

Personally identifiable information includes, but is not limited to:

- the student's name;
- the name of the student's parent or other family member;
- the address of the student or student's family;
- a personal identifier, such as the student's Social Security Number or student number;
- a list of personal characteristics that would make the student's identity easily traceable; or
- other information that would make the student's identity easily traceable.

NYS Electronic Signatures and Records Act (ESRA)

Personal information shall mean data that identifies a specific person, including but not limited to, home and work addresses, telephone number, e-mail address, Social Security Number, birth date, gender, marital status, mother's maiden name and health data.

What kind of documents typically contain sensitive information?

Following is just a sample of documents which may contain sensitive information:

- Time records
- Travel requests/documentation
- Old student schedule cards
- Grade reports
- Petition requests
- Declaration of candidacy for a degree forms
- Old student general purpose student class lists (green bar)

How long should sensitive information be maintained?

There is currently no retention schedule governing academic or student health records available online, however, the 1977 SUNY Records Retention Schedule is still available in hard copy and should continue to be used when records specific to SUNY (Binghamton University) can be found within this schedule.

The complete General Retention and Disposition Schedule for New York State Government Records, addressing administrative records, can be found at http://www.archives.nysed.gov/a/records/mr_pub_genschedule.shtml.

If a record is found in both the SUNY Records Retention Schedule and the General Retention and Disposition Schedule for New York State Government Records (the schedule listed in the above website), the General Retention and Disposition Schedule for New York State Government Records supersedes the SUNY Records Retention Schedule and should be used. If a record is not found listed in the SUNY Records Retention Schedule, refer to the General Retention and Disposition Schedule for New York State Government Records to see if it is in this schedule. If a record cannot be found in either schedule, the record must be maintained until a retention schedule can be created for this particular record.

Staff should keep a list of any records they dispose of. This shows that records are being purged in accordance to the retention schedules (both the SUNY and the State schedules). This also pertains to discoverable records (lawsuits) and the Freedom of Information Law (FOIL).

Retention schedules govern what information must be maintained, and for what period of time. Retention for the above sampling of documents that may be retained in academic or administration offices is:

- time records - destroy after 3 fiscal years
- travel requests/documentation - destroy 3 fiscal years after payment or overpayments are returned by the employee, whichever is later
- old student schedule cards – for duplicates - cutoff at the end of the year of last

- attendance, retain 6 additional years and then destroy
- grade reports - for both originals and duplicates - cutoff at the end of the academic year, retain an additional 3 years, transfer data to student's permanent record and then destroy
- petition requests -for duplicates - cutoff at the end of the year of last attendance, retain 6 additional years and then destroy
- declaration of candidacy for a degree forms - for duplicates - cutoff at the end of the year of last attendance, retain 6 additional years and then destroy
- old student general purpose student class lists (green bar) - for duplicates - cutoff at the end of the year of last attendance, retain 6 additional years and then destroy

The complete retention schedule for administrative records can be found at http://www.archives.nysed.gov/a/records/mr_pub_genschedule.shtml. There is currently no retention schedule governing academic or student health records available online. The offices of Human Resources, Business, the Registrar and Admissions follow all official retention guidelines for their respective areas. Human Resources maintains all administrative information such as time records, the Business Office is the official repository of business transaction information such as travel documentation, the Registrar maintains all student academic records and the Admissions office maintain all admissions records.

The Faculty-Staff Handbook includes a section on retention of Grade Reports and can be found under <http://provost.binghamton.edu/faculty-staff-handbook/handbookvii.html#A#A>. VII.A. General Information and Policies, VII.C. Grading, as well as a section about duplicate copies of old student schedule cards; petition requests; declaration of candidacy for a degree forms; and old student general purpose student class lists (green bar) maintained by all academic areas, departments chairpersons, etc., under <http://provost.binghamton.edu/faculty-staff-handbook/handbook-vii.html#A#A>.

VII.A. General Information and Policies, VII. Instructional Policies.

VII.C.4. Examinations and Papers

Examinations, papers, and other projects should be graded within a reasonable time, and should be returned or made available to students who wish to review them. It is also expected that comments and corrections will be explained to students who seek explanations. Graded work not returned to students should be kept for three years following the end of the academic year in which the course was offered, in accord with the New York state records retention schedule, to allow a means of evaluating the work of students who ask that a grade be reviewed.

VII.A.4. Records Retention

It is University policy that the Office of the University Registrar will maintain a student file (hard copy or scanned/digitized images) and computerized academic record for a student for six years from the date of last attendance. The hard copy or scanned/digitized file contains admission information, high school transcripts, transfer

transcripts, academic petitions, degree certification information, and academic action information. After the six-year period, the hard copy or scanned/digitized file is purged, while transcripts are archived for permanent retention and the computerized record remains available. The Office of the University Registrar maintains original grade submissions from faculty permanently.

If I have questions about retention, is there someone I can contact?

Questions on the retention schedule can be directed to the University archivist, Yvonne Deligato, at deligato@binghamton.edu.

What about electronic files?

While the focus of this shredding and disposal effort is on hard-copy documentation, everyone is reminded to review files on their computers and delete electronic files that contain sensitive information. For information about computer data security, visit <http://its.binghamton.edu/policies/data-security-guidelines>. If you have questions about deleting files or the security of files on your computer, ask your regular ITS contact for help or call the Help Desk at 777-6420.

How is sensitive information handled by the vendor we've contracted with since the shredding is done off-site?

The University's current shred provider has provided a certificate verifying that the documents they collect from campus are indeed shredded. The certified contractor is the only entity that handles the paper placed in the shred bins on campus.

Is it appropriate to use shredders located on campus and then to recycle the shredded material?

Yes. Once the documents containing sensitive information are shredded, they can be left for pick up as recycling and do not need to be put into a shredding lock bin.

Where are shredding lock bins located on campus?

See <http://facilities.binghamton.edu/confshred.htm>

How do I request a confidential shredding lock bin?

Contact Peter Coyle, environmental resource coordinator, at recycle@binghamton.edu to request a shredding bin.