

TITLE OF THE POLICY

Learning Management System (LMS) Records Retention Schedule.

PURPOSE OF THE POLICY

This policy governs digital student records generated while delivering online courses. These records are confidential, protected under FERPA regulations, and must be provided to students or legal authorities when requested. North Carolina General Statutes (NCGS) § 115D, § 121, and § 132 have no special provisions for the handling or retention of digital academic records or protection from litigation regarding such records. NCGS and current Wake Tech policy require the retention of course and student records for a period of five (5) years. Retaining student-generated data poses legal risks for the college if a student or parent sues or if records are compromised through accidental release or malicious intrusion. The maintenance, security, storage, and backup of records in perpetuity and the mechanisms for producing the records in an accessible form constitute a financial burden for the college as well.

APPLICABILITY

Faculty, staff, and students.

POLICY STATEMENT

Wake Tech will utilize best practices related to maintaining a comprehensive Learning Management System (LMS) records and data archive and retention schedule. The retention schedule will adhere to all applicable regulations and comply with all audit criteria. The retention schedule provides information pertinent to all types of courses offered by the college and provides instruction for storage and destruction of affected data.

DEFINITIONS

Word/Term	Definition
Archive	A compressed electronic file containing all digital records for a class. Archives are generated using the utilities provided within the LMS. This process creates a copy of the course without deleting the course and contains all information from the original course except for general activity.
Cloud-Based Data Storage Solution	A service that allows users to store, access, and manage data over the internet using remote servers maintained by a cloud provider.
Deep Storage	A tier of data storage designed for long-term retention of infrequently accessed data. Storage costs are lower, but the cost of data retrieval is higher. Retrieval of deep storage course archives is four to five business days.
Enterprise Resource Planning (ERP) System	A database-driven software system which houses and operates on all data relevant to the operations of an organization.
FTE	Annual full-time equivalent student.
General Activity	General activity refers to the tracking of individual clicks within a course in the LMS in order to open documents or content.
LMS	Software that provides a suite of tools, usually accessible via a web browser, to facilitate conducting training, classes, or collaboration via the Internet.
LMS Records	All digitally-generated materials accumulated during the process of conducting or supporting classes within the college's LMS that are stored within the archive.

Merge Course	Merge course provides a mechanism to incorporate enrollments from multiple sections within the LMS into a single course for central
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	management of course content. Actual section enrollments are clearly indicated within the grade center in the merge course.
Non-Destructive	No data is deleted or changed.
Non-Scheduled Resource Course	An LMS course environment that is not created directly from a curriculum or continuing education course section in the college ERP system, including but not limited to development, collaboration, training, tutoring, communication, committees, etc.
Scheduled Course/ Official Course	An LMS course environment that is created directly from a curriculum or continuing education course section in the college ERP system.
Substantive	Important or of value.
Unsupported LMS	LMS or service connected to the LMS that is not administered, accessed, or maintained by ITS. Examples include but are not limited to WebAssign, McGraw-Hill Connect and Create, Pearson MyLabs, Ed2Go, etc.
Work Order	A problem, request, or question submitted via the online communication tool provided by ITS.

PROCEDURES

All data generated in delivering instruction have (1) business value for the college in complying with audits (including but not limited to FTE audit, which determines funding), and (2) substantive value for students in the transfer of credits and other needs. These data will be retained and readily accessible as long as they have business value; when records no longer have business value, they will be destroyed. Retention schedules for LMS data are defined as follows:

A. Course Archives

All scheduled courses will be archived upon completion of the class. For Workforce Continuing Education classes, completion will be the end date as scheduled; for curriculum classes, completion will be after the last day to make up incomplete grades. Archives are stored on a cloud-based data storage solution. The archival process is a non-destructive backup only. Merge courses will be archived following the requirements for their connected official course sections.

B. Data Retention

All scheduled courses will remain available within the LMS for a period of one year from the original delivery term, after which they will be deleted from the LMS. Only archives will be retained past one year according to the data retention schedule.

C. Data Retention Schedule

All archives for courses with specific licensure/certification boards or other authorities will remain in the approved cloud-based data storage solution for five (5) years and then destroyed.

D. Data Retention Schedule Exceptions

All archives for courses with licensure/certification board or other authority requirements will be retained as required by superseding policy (see table below). ITS must be notified by a member of management in the department of the affected course(s) in writing of any changes in requirements for data retention, upon discovery of the changes.

Licensure & Certification Board Retention Requirements		
Data Type	Retention Schedule	Reason
Workforce Continuing Education	Retain for 5 years, then destroy	Community Colleges Disposition Schedule for all Continuing Education Records.
Emergency Medical Services Course (EMS)	Retain for 5 years, then destroy	Coincides with the renewal period of CoAEMSP (Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions) accreditation.
Medical Assisting Course (MED)	Retain for 5 years, then destroy	Required for certification audit compliance.
Nursing Course (NUR)	Retain for 5 years, then destroy	Required by the Accreditation for Commission for Education in Nursing (ACEN)
Nursing Assistant Course (NAS)	Retain for 5 years, then destroy	Required by the Accreditation for Commission for Education in Nursing (ACEN)
Surgical Technology Course (SUR)	Retain for 5 years, then destroy	Required by the Accreditation Review Committee for Surgical Technologists & Surgical Assistants (ARC/STSA).
Medical Laboratory Technology Course (MLT) Phlebotomy Course (PBT)	Retain for 7 years, then destroy	Complies with the National Accrediting Agency for Clinical Laboratory Sciences (NAACLS) self-study cycle. The Phlebotomy (PBT) self-study cycle is 4 years; however, the joint on-site review occurs every 7 years.
Radiography Course (RAD) Magnetic Resonance Imaging Course (MRI)	Retain for 8 years, then destroy	Complies with Radiography accreditation cycle.
Therapeutic Massage Course (MTH)	Retain in perpetuity	North Carolina Board of Massage and Bodywork Therapy (NCBMBT)
Adult High School Programs	Retain in perpetuity	Complies with 20 USC 1232g

E. Retention for Courses Archived Upon Request

ITS periodically receives requests to archive courses. Requested archives should be retained as follows:

1. If archived as part of legal proceedings, transfer the archive to permanent storage media and retain in perpetuity.
2. If archived for instructor review or backup, retain the archive for five (5) years from the archival date unless meeting exceptions noted in Section D; then follow exception schedule.

F. Unsupported LMS

When using an unsupported LMS, instructors must coordinate with their supervisors to ensure compliance with archive and retention policies. Instructors can submit a work order to ITS to verify that an LMS is unsupported.

Adult High School Program records are retained in the College and Career Readiness administrative office.

G. Course Archive Retrieval

Course archives are maintained by ITS to support instructional continuity and institutional needs. Faculty and staff have immediate access to their courses for one year after the initial course archive occurs. After the initial one-year period, course archives will be readily accessible by ITS for one additional year. After such, these archives are transitioned into deep storage, where retrieval incurs associated costs. Due to the nature of deep storage, ITS will limit access to these archives strictly to requests that serve legal or official Wake Tech business purposes. Faculty and staff are encouraged to retrieve any materials needed within the initial one-year window to avoid delays and potential charges.

RELATED POLICIES, PROCEDURES, REFERENCES, FORMS, OR TERMS

Type	Name	Location
Reference	NCGA - General Assembly website for statutes	Perform web search using term "NCGA Statutes;" first item returned: http://www.ncleg.net/gascripts/statutes/statutes.asp
Reference	NCGS Chapter, 115D, 121, 132	Search NCGA website with terms "academic AND records AND retention"
Reference	NC Department of Cultural Resources retention schedules	Perform web search with terms "NC records retention law" https://archives.ncdcr.gov/government/local
Reference	NCCCS Records Retention & Disposition Schedule, Item 4-6	Perform web search using term "NCCCS Records Retention Disposition;" first item returned: https://www.ncccommunitycolleges.edu/sites/default/files/basic-pages/finance-operations/ncccs_colleges_2021_record_retention_policy.pdf
Reference	20 USC 1232g	https://www.govinfo.gov/app/details/USCODE-2023-title20/USCODE-2023-title20-chap31-subchapIII-part4-sec1232g

CONTACT INFORMATION

Subject	Contact	Telephone	E-mail / Web Address
Policy Clarification	Director of Academic Technology & Support Services	919-866-5046	ilunitis@waketech.edu
eLearning Clarification	Manager of eLearning Support	919-866-5618	
Curriculum Clarification	Dean, Curriculum Education Registrar	919-866-5933	heswart@waketech.edu
Workforce Continuing Education Clarification	Dean, Workforce Continuing Education Registrar	919-866-5838	khjordan@waketech.edu

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