

ADS Data Retention Policy

Applicants to the Schools and Libraries Program of the Universal Service Fund ("Entity"), commonly known as "E-Rate," which is administered by the Universal Service Administrative Company (USAC) under the direction of the Federal Communications Commission (FCC) must maintain program documentation for ten (10) years after services are received.

Guiding Principle:

Entity Data generated while under contract with ADS and data generated by employees of ADS, shall be retained by ADS for a period of twelve (12) years after the closing of a funding year in which Entity Data was created or received. The original Entity Data may be retained by ADS on behalf of the entity but must be returned to the Entity upon request of an appropriate entity official. Additionally, ADS employees shall not dispose of Entity Data during the time period referenced above unless explicit written approval for such disposition is received from the Entity.

Definition:

Entity Data means recorded information, regardless of form or medium on which it may be recorded. The term includes electronic and paper information as well as digital information (computer databases, and documentation thereof). Entity Data includes USAC correspondence, vendor correspondence, entity information (technology plans, pre-bidding, bidding, contracts, application process, invoices, provision of services, and other matters relating to the administration of the Universal Service Fund), e-mail records, and ADS database contents.

Rationale:

It is important that USAC delegated auditors be able to conduct a review and document the results of the School & Libraries funds at work in an Entity. When an auditor leaves the Entity, (s)he must recognize that the Entity has access to their own data. Auditors should be cognizant of the requirement to retain Entity Data, but should recognize that certain information may be generated which is not Entity Data and therefore need not be retained.

E-mail:

ADS's employees use e-mail as a delivery system for electronic communication and considers e-mail as an official means of communication. ADS shall consider vendors, entity representatives and employees to be duly informed and in receipt of notifications and correspondence sent by ADS to e-mail accounts. ADS shall not be held responsible for delivery problems caused by entity or vendor e-mail accounts. The automated e-mail system cannot discern differences between information of limited or transitory value and that of lasting value. ADS employees may print copies of important documents and correspondence sent by e-mail to be stored in relevant subject files or save the messages in a stable retrievable electronic format on a long term medium such as a CDR or DVD. As with other data, ADS e-mail shall be retained for twelve (12) years.