

Records Retention

How long we hold the records we create for you, where they live, when they are returned or destroyed, and what happens to a file when an engagement ends.

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Fractional Coordinator, Inc. is incorporated in Delaware and headquartered in Oregon. We hold records created in the course of an engagement under the schedule below, which is set to meet the longest applicable obligation rather than the shortest.

This is our schedule, not yours. Your own retention obligations depend on your sector, your funding, your state, and your own policy, and they may be longer than ours. Where a signed engagement letter sets a different period, that letter governs.

The principle

Two risks sit on opposite sides of a retention schedule. Destroy a record too early and you cannot prove what you did. Keep it too long and you are holding sensitive information about real people for no reason, with all the exposure that carries.

We resolve that by holding investigative records for the period a reviewer could still examine them, and by holding nothing else beyond its purpose.

Whose schedule applies

This depends on the capacity we are engaged in, and the difference is not cosmetic.

- **Fractional leadership.** A fractional coordinator holds a seat inside your institution and works as internal staff. Records created in that seat are institutional records. They live in your systems, they are governed by **your** retention schedule, and they remain yours when the engagement ends. We do not run a parallel schedule against them and we do not keep a shadow copy.
- **External investigations and expert work.** Here we are an outside neutral rather than staff. Our working file is our own record and is held under the schedule below. The institution separately receives the report and the evidence file as its record, on its own schedule. The two exist independently, which is part of what makes the work reviewable.
- **Training, advisory, and membership.** Our own records, on our schedule. Attendance and certification records are held for seven years so that an institution challenged on who was trained can prove it.

Where an engagement carries more than one capacity, the fractional seat follows your schedule and the investigation follows ours. The engagement letter states which applies to which before the work begins, so nobody is deciding it afterwards.

One consequence is worth stating plainly. If we hold a seat for you and you later ask us what we retained from that period, the answer is that the records are yours and always were. We can tell you where they sit in your systems. We cannot produce a copy we never kept.

Retention schedule

This schedule governs records we hold as an outside firm. It does not apply to institutional records created by a fractional coordinator holding your seat, which follow your own schedule.

- **Title IX investigation records** including the report, evidence, notices, and determinations: **seven years** from the conclusion of the matter, which is the period the Title IX regulations require of institutions.
- **Clery-related records**: **seven years** from the later of the matter concluding or the Annual Security Report in which it appears.
- **Title VI, Title VII, ADA, and Section 504 investigation records**: **seven years**, aligned with Title IX rather than the shorter periods some of those frameworks permit, because institutions rarely sort a file by which statute it turned on.
- **Records created under a federally funded engagement**: at least **three years** from final expenditure report, per the federal award requirement, or seven years under this schedule, whichever is longer.
- **Matters involving a minor**: until the student reaches **21**, or seven years from conclusion, whichever is later, because limitation periods for minors do not begin to run while they are minors.
- **Training and certification records**: **seven years**, so that an institution challenged on who was trained and to what standard can prove it.
- **Engagement letters, invoices, and contract records**: **seven years**, which covers the Oregon six-year contract limitation period and the Delaware three-year period with margin.
- **Conflict screens, disclosures, and objections**: retained with the matter and for the same period as the matter.
- **Applications and hiring records**: **three years** from the application, or three years from the end of employment for those hired.
- **Website, marketing, and subscription records**: while the relationship is live and for **two years** after, or until the person asks us to delete them.

What is not a record

Prompts, model inputs and outputs, and working context from any AI tool are not records of a matter and do not appear in the schedule above. They are held only while the matter is live and are deleted when it concludes. Nothing in a report or an exhibit rests on them, which is why nothing is lost by deleting them. Our AI policy sets out why.

The same applies to routine working material with no evidentiary value: scheduling notes, formatting drafts, and administrative correspondence that adds nothing to the record.

Legal holds

A scheduled destruction date is suspended the moment we know, or reasonably should know, that a record is relevant to actual or anticipated litigation, an agency investigation, an audit, or a public records request. The hold stays in place until the matter closes and counsel releases it.

A legal hold always overrides this schedule. Nothing in the schedule is a reason to destroy a record that is under hold, and no practitioner has the authority to override a hold.

Where records live

For work we perform as an outside firm, active matter records are held on encrypted systems under our control, in the United States, with access limited to the practitioners assigned to the matter and the person supervising it.

For fractional leadership, the work happens in your systems. A practitioner holding your seat uses your case management, your drive, and your email under your governance, because those records are yours. Where a task genuinely cannot be done in your environment, we say so and agree in writing what sits outside it.

We do not hold client records on personal devices or in personal accounts. Practitioners work in firm systems, and that is a condition of engagement rather than a preference.

What happens at the end of an engagement

On conclusion, the matter file is delivered to the institution in a usable format. That file is the institution's record and the institution's to retain under its own schedule.

We then keep our own copy for the period above, so that we can answer questions about work we performed. On request, and where no legal hold applies, we will instead destroy our copy at the point of delivery and confirm in writing that we have done so. Some institutions prefer that, and we would rather they ask than assume.

How records are destroyed

Destruction is deliberate rather than incidental. Electronic records are deleted from live systems and from backups on the backup cycle, and physical records are shredded. We keep a destruction log recording what was destroyed, when, under what authority, and by whom, and the log itself is retained for seven years.

Your right to ask

A party to a matter may ask what we hold about them and, subject to the obligations above, may ask us to correct or delete it. Where a legal hold or a retention requirement prevents deletion, we will say so and explain which one applies rather than declining without a reason.

Our Privacy Policy sets out the wider set of rights and how to exercise them.

This is our schedule, not legal advice

We are a civil rights compliance firm and not a law firm. This schedule reflects the periods we hold records for and the reasoning behind them. It is not advice about your obligations, and it is not a determination that these periods satisfy every rule that applies to you. Confirm your own schedule with your counsel and your records officer.

How to reach us

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