



UNIVERSITY RECORDS MANAGEMENT POLICY

Responsible Department: Office of General Counsel
Responsible Administrator: General Counsel
Reviewed/Updated Date: January 2022
Date of Scheduled Review: January 2026

I. PURPOSE

To establish proper retention, storage, and disposition of university records by requiring individual departments and offices to create procedures for handling records from the time of their creation or receipt to the time of their ultimate disposition.

II. SCOPE

This Records Management Policy (RMP) applies to all records created or received by university employees acting in the course and scope of their duties.

III. DEFINITIONS

“Records” – Anything that stores information. Records can take many forms. These include information stored on paper, microfilm, optical disk, electronic tapes, photographs, maps, motion pictures, electronic files, emails, or any other medium containing information. All records subject to this policy must be assigned proper retention periods regardless of their form or storage locations.

IV. PROCEDURE

A. Responsibility for University Records

While all university records are university property, the primary responsibility for managing the university’s records rests with the department or office (collectively referred to in this policy as “departments”) responsible for creating those records. Therefore, each department is responsible for creating its own records management schedule. While departments are free to establish their own format, a template is provided in **Appendix A**. Once complete, each department should provide a copy of its records management schedule to the Office of General Counsel.

The goal in developing these schedules should be to create, preserve, and safeguard university records for valid operational, legal, or historical reasons. Specifically, each department should:

- Create only the records it needs;
- Retain records according to this RMP;
- Maintain records in appropriate locations;
- Identify and protect vital records;
- Preserve records of historical significance; and
- Dispose of records no longer required.

To accomplish these objectives, each department is strongly encouraged to appoint a Records Manager to assist in implementation and compliance with this policy. In addition, each department should designate one day or portion thereof each year to allow its employees to focus on the requirements in this RMP, including reviewing and updating its departmental records management schedule.

All faculty, staff, and administrators are responsible for information and records created during their employment including, but not limited to, their electronic files and emails. This means that employees must properly maintain those records in accordance with this RMP and their respective department's records management schedule.

B. Records Management Guidelines

In developing its records management schedule, departments should consider the following:

1. **Best Practices.** Best academic or professional practices may suggest a specific retention period. Departments are strongly encouraged to comply with best practices in their respective fields. (Example: Standards established by the American Association of Collegiate Registrars and Admissions Officers)
2. **Other Policies or Contractual Obligations.** Other university, college, or departmental policies or university contracts may dictate a retention period. Compliance with such policies and contracts is required. (Example: A credit card processing agreement requires charge records to be kept for two years).
3. **The Records Retention Schedule.** The Records Retention Schedule (RRS), which is attached as **Appendix B**, is a non-exhaustive timetable stating a recommended retention period for various records as set out in federal and state regulations. Where possible, it provides the legal authority for a *minimum* retention period. This list will be maintained and updated by the Office of General Counsel. However, if you believe that the legal requirements related to a record are different from those listed on the RRS, please contact the Office of General Counsel.
4. **Historical.** Consider the historical significance of records. Please refer to "Guidelines for Determining Historical Significance" attached as **Appendix C**. (Example: A retiring professor's lecture notes and correspondence.)

C. Storage of Records

Factors to consider when storing records include organization, accessibility, security, climate control, and damage prevention. When storing electronic records, employees should also consider storage medium lifecycle and ease of records transfer.

D. Disposal of Records

Confidential paper records and records containing personally identifiable information (e.g. payroll or benefits information, social security or driver's license numbers, or account numbers with access codes or passwords) should be disposed of by shredding so that they cannot be read or reconstructed. In regard to confidential

electronic records, each department should consult with Information Services to determine the most appropriate methods of destruction.

E. Litigation Holds, Governments Investigations, or Audit

The law holds the University responsible for the destruction of documents when litigation, government investigation, or audit is foreseeable. Therefore, regardless of the retention period, if any claim, litigation, investigation, audit, or other action involving the record is contemplated or ongoing, departments should put a “hold” on the disposal of the record until the resolution of the action.

V. COMPLIANCE

Violations of the law related to document management or of this RMP may result in disciplinary action, up to and including dismissal. If records are deliberately destroyed in violation of the law, criminal or civil penalties may also be imposed.