Records Retention

- 2 Effective: Moved to the Policy Library from UPM 2.5(11)
- 3 Updated/Revised: January 21, 2011
- 4 Contact: Policy Administrator
- 5 Link to Records Retention Guidance and Schedule

6 Introduction

- 7 There are three guiding purposes for this records retention policy:
- Accountability. This policy is written to assure compliance with state and federal law. As a
 public institution, the university has an obligation of accountability. By preserving university
- 10 records, the institution documents its policies, actions and determinations.
- **History.** Key records of the institution document its history and its character.
- Efficiency. An appropriate records retention policy assures maintenance of records needed for
 ongoing operations. Conversely, records that are no longer useful should be discarded or
 archived to increase efficiency.
- 15 This policy addresses the identification of records and the duration for retaining institutional records.
- 16 The "Records Retention Guidance and Schedule" (see <u>Resources</u>) is a companion resource and an 17 element essential to compliance with this policy.

18 Policy Statement

- All faculty and staff have responsibility for identifying and retaining university records-paper and
- 20 electronic-in accordance with the Records Retention Guidance and Schedule. Records are to be
- 21 archived or destroyed after the retention period, subject to the exceptions stated in this policy
- 22 regarding retention for audit and litigation purposes.

23 Identification of University Records

- 24 Initially, a determination must be made as to whether the record is a
- University record that is subject to this policy, or a
- Transitory record which is not subject to this policy
- 27 Consistent with Iowa Code §305.2(9), Iowa State University records are defined as any document,
- 28 book, paper, electronic record, photograph, sound recording, or other material, regardless of
- 29 physical form or characteristics, containing information, and which is made, produced, executed, or
- 30 received in connection with the transactions and activities of the university.
- 31
- 32 By law or contract, a university record may be subject to federal ownership or regulation. Such
- records will be maintained as required by the applicable legal or contractual provisions.
- 34

- 35 Active, inactive, and/or archival retention periods are specified for university records. Some records
- 36 may be *transitory* only and for these records no retention is required. And, for the purposes of this
- policy, library and museum material made or acquired and preserved solely for reference or
- exhibition purposes, and stocks of publications and unprocessed forms are not university records.
- 39
- 40 Definitions of the retention periods and other terms related to records retention are located within the
- 41 Records Retention Guidance and Schedule (see <u>Resources</u> below).

42 **Records Retention Schedule**

- 43 All faculty and staff have responsibility for complying with the provisions of the Records Retention
- 44 Schedule which addresses the management and preservation of specific university record types.
- 45 The Schedule indicates the required--
- Duration for which each record type must be retained
- Responsibility assignments for the management of active records, the storage of inactive
 records, and the archival of permanent records
- 49 Confidentiality of each record type
- 50 Disposal method (if applicable)
- Contact information for submitting additions, updates, and corrections to the Retention Schedule
- 52 **Permanent retention:** The University Archives must be consulted regarding permanent storage
- 53 decisions. Permanently retained records are to be stored in a media form and location that will
- 54 adequately endure the passage of time.

55 Exceptions

56 Caution: Audit, Litigation, or Public Records Request

- 57 A university record may not be destroyed by the holder of the record if the holder is aware of any
- audit, litigation, public records request, claim, negotiation, open administrative review, or other action
- 59 involving the record. Records must be maintained until all required audits and requests are
- 60 completed and should be retained beyond the listed retention periods when there is a probability of
- 61 litigation either involving records or requiring their use. If the Offices of University Counsel, Internal
- 62 Audit, or Research Assurances, or the Research Integrity Officer have issued a litigation or legal
- 63 hold, records relevant to the issue must be preserved until the hold has been released.

64 Redundancy

- Excess copies of records should be destroyed when they cease to be useful and should never be
- 66 kept longer than the university record. Stocks of obsolete forms or pamphlets are not considered to
- be university records and are not subject to this policy or the Records Retention Guidance and
- 68 Schedule.

69 Disposal of Records

70 University records that are not archived permanently will at some point be subject to disposal.

71 Expired Records

- 72 The unit chair or director (or designee) is responsible for conducting an annual review to identify
- records with expired retention periods. The disposition of expired records must be handled in a
- systematic manner. If an expired university record is to be destroyed, the unit chair or director must
- 75 preauthorize the destruction.

76 Secure Destruction

- 77 The unit chair or director is responsible for assuring the secure destruction of sensitive or
- confidential records that will no longer be retained. Secure destruction is required for records
- containing confidential information. Paper records must be shredded or destroyed in a manner to
- 80 make them unreadable. Digital media must be scrubbed or destroyed using current industry
- 81 standards. See Resources section below for "Confidential Document Destruction."

82 **Resources**

83 Links

- 84 <u>Records Retention Guidance and Schedule</u>
- 85 ITS Exchange Email Best Practices
- 86 Employee Records
- 87 Retention of Job Applications
- 88 Confidential Records Students
- 89 Social Security Number Protection Policy
- 90 Confidential Document Destruction
- 91 Public Records Requests
- 92 <u>University Archives / University Library Special Collections</u>
- 93 Iowa Code §305.2(9) Definition of "Record"
- 94 Information Technology Services
- 95 Office of University Counsel
- 96 Office of the Senior Vice President and Provost
- 97
- 98 Files
- 99 <u>Record Type Submission Form (electronic)</u>
- 100 <u>Record Type Submission Form (manual)</u>