Records Retention

- 2 Effective: Moved to the Policy Library from UPM 2.5(11)
- Reviewed: July 1, 2019
- 4 Contact: Policy Administrator
- 5 Link to Records Retention Guidance and Schedule

6 Introduction

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- 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 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. The
- 16 "Records Retention Guidance and Schedule" (see Resources) is a companion resource and an element
- essential to compliance with this policy.

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 archived
- or destroyed after the retention period, subject to the exceptions stated in this policy regarding retention
- for audit and litigation purposes.

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, book,
- 28 paper, electronic record, photograph, sound recording, or other material, regardless of physical form or
- characteristics, containing information, and which is made, produced, executed, or received in connection
 - with the transactions and activities of the university.

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.

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 35 Active, inactive, and/or archival retention periods are specified for university records. Some records may
 36 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.
- Definitions of the retention periods and other terms related to records retention are located within the
- 41 Records Retention Guidance and Schedule (see Resources below).

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44 Records Retention Schedule

- All faculty and staff have responsibility for complying with the provisions of the Records Retention
- 46 Schedule which addresses the management and preservation of specific university record types. The
- 47 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
- Confidentiality of each record type
- Disposal method (if applicable)
- Contact information for submitting additions, updates, and corrections to the Retention Schedule
- Permanent retention: The University Archives must be consulted regarding permanent storage
- decisions. Permanently retained records are to be stored in a media form and location that will
- adequately endure the passage of time.

57 Exceptions

58 Caution: Audit, Litigation, or Public Records Request

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

66 Redundancy

- 67 Excess copies of records should be destroyed when they cease to be useful and should never be 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 Schedule.

70 Federal Contracts

- 71 Federal contracts may require the application of federal records disposition schedules. In such cases, the
- federal records disposition schedules will take precedence over the University Records Retention Policy
- 73 and Schedule.

74 Disposal of Records

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

76 Expired Records

- 77 The unit chair or director (or designee) is responsible for conducting an annual review to identify records
- 78 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 preauthorize the
- 80 destruction.

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Secure Destruction

- The unit chair or director is responsible for assuring the secure destruction of sensitive or confidential
- 83 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 make them unreadable. Digital
- media must be scrubbed or destroyed using current industry standards. See Resources section below for
- 86 "Confidential Document Destruction."

87 Resources

88 Links

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- Records Retention Guidance and Schedule
- ITS Exchange Email Best Practices
- Employee Records
- Retention of Job Applications
- Confidential Records Students
- Social Security Number Protection Policy
- Confidential Document Destruction, Recycling Services
- Public Records Requests
- <u>University Archives / University Library Special Collections</u>
- lowa Code §305.2(9) Definition of "Record"
- Information Technology Services
- Office of University Counsel
- Office of the Senior Vice President and Provost

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