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3.233 Records Management Policy

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| | | Policy 3.233 | |
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| Responsible Office: | Responsible Administrator: | Contact information: | Applies to: |
| Office of General Counsel | Mary Granger | 603-283-2437 | University and All Campuses |

I. Introduction

A. Purpose

The purpose of the Records Management Policy is to (1) establish an efficient and cost-effective, University-wide, records management system for maintaining, identifying, retrieving, preserving and destroying records, (2) ensure that records are adequately protected, (3) preserve Antioch University history, (4) ensure that records that are no longer needed, or are of no value, are destroyed at the appropriate time, (5) optimize the use of University facilities and space, and (6) comply with all applicable local, state, and federal laws and regulations.

B. Principles of Records Management

The following principles of records management apply to Antioch University:

1. Appropriate measures and standards will be applied to ensure that University records remain authentic, secure, and confidential.
2. The collection, processing, maintenance, disclosure, storage, retention and disposal of Personally Identifiable Information (PII), will be conducted in accordance with applicable laws, regulations, and University policy.
3. University records will be preserved in reliable recordkeeping systems for as long as required by law and University policy.
4. Records will be accessible and retrievable in a timely manner throughout their retention period.
5. Access to University records will be controlled in accordance with applicable laws, regulations, and University policy.
6. The creation, management and destruction, of University records will be an integral part of work processes of University departments and offices.
7. Records will be retained and disposed of in accordance with records retention schedules and destruction procedures and plans.

C. Scope

This Policy applies to all records, including both original documents and reproductions, created or received by, an office or department of the University, in the transaction of its proper business, or in pursuance of its legal obligations. This Policy applies to all University records, regardless of format, or media type, including, but not limited to, paper records, micro-filmed records, and records stored on computers or other digital media.

Records stored in email accounts, or in computer-based files, will follow the same retention and disposal schedules, as paper-based records of the same type. Antioch's Email Use Policy 8.103, contains additional information about retention of records, and correspondence stored in email accounts.

II. Definition of Terms

Archival record: A record that has permanent or historic value, is inactive, and is not required by law to be retained in the office in which it originated, or was received.

Archival records are retained and preserved indefinitely, in the University archives under the direction of the Chancellor's Office.

Closed campus record: An inactive record associated with any of the Antioch University campuses that are no longer in operation as part of Antioch University, including but not limited to, Antioch College. Closed campus records are typically maintained within the University's digital records system; however, inactive University records of historical significance are maintained by the University archives. In addition, any contractual obligations associated with the University's management of closed campus records, shall supersede the Record Retention and Disposal Schedule, unless otherwise directed by the Office of General Counsel.

Custodian: The designated department or unit, as identified in the Record Retention and Disposal Schedule, responsible for the retention, and timely destruction of University records in compliance with this Policy.

Digitization: The process of converting printed, or graphic materials on paper, film or other material, into digital electronic signals for reading by a computer. Digitization is generally accomplished by scanning the document.

Electronic record: A University record, data, or information, that has been captured, and fixed in a non-tangible electronic format. Electronic records include, but are not limited to, word-processor documents, spreadsheets, databases, HTML documents, scanned or imaged documents, photographs, audio and visual files, and any other type of file stored online, on a mainframe, on a computer hard drive, or on any external storage medium (including disks and flash drives). The same retention standards that apply to tangible University records also apply to electronic records; and the retention periods outlined in the Record Retention and Disposal Schedule apply equally to University records in all formats.

Fiche: A type of record format consisting of a flat sheet of microfilm, typically used for the purpose of maximizing space efficiency. University records kept on fiche are bound by the same standards and retention periods as records kept in paper or electronic formats.

Hardcopy record: A University record that is in paper, or other tangible format.

Historical value: The measure of the importance of a record to the University, campus or program justifying its permanent retention. Whether a record has historical value, is determined by the University Records Committee, in consultation with the Chancellor's Office.

Litigation hold: A requirement that the University preserve all data relevant to a current or reasonably anticipated legal action in order to prevent the alteration or destruction of

potential evidence. Litigation holds are commenced by the Office of General Counsel, and generally suspend all archiving and deletion activities, as well as prohibit all overwriting, or alteration of existing data.

Personally Identifiable Information (PII): Records that include an individual's name together with one of the following: full Social Security number; driver's license number; state or national identification card number; financial account number; credit or debit card number (with or without any required security code, access code, personal identification number, or password that would permit access to an individual's financial account); or biometric indicator. Personally Identifiable Information (PII) is highly sensitive, and must be safeguarded and secure at all times.

Record Retention and Disposal Schedule: The table listing the required record retention period, and the designated custodian for each identified University record.

Record retention period: The length of time for which the custodian is responsible for retaining a specified University record, in accordance with the Record Retention and Disposal Schedule.

University record: Any recorded information that is created, or received by a University employee, or department in the ordinary course of University business. All University records, regardless of their format (e.g. hardcopy, or electronic), are subject to this Policy. The following terms are used to describe the retention status of a University Record:

Active record: A University record that is currently being used in the ordinary course of University business. Active records remain active for a varying number of years, depending on the purpose for which they were created, as well as regulatory requirements. Active records include records in all formats, including but not limited to: paper, fiche, digitized or scanned documents, audio, video, electronic documents, and all other formats.

Expired record: A University record that is intended for destruction by the end of the calendar year, as it is no longer being used in the ordinary course of University business, whose record retention period has ended (or is not listed under the Record Retention and Disposal Schedule). It is not subject to a litigation hold, and is not a Historical Record.

Destroyed record: A University record that has been destroyed in accordance with this policy, and the Record Retention and Disposal Schedule.

Inactive record: A University record that is no longer being used in the ordinary course of University business, that must be retained until the end of its record retention period, and is not required to be preserved in accordance with a litigation hold. Inactive University records are typically maintained in the University's digital

records system. However, inactive University records of historical significance, otherwise known as archival records, are maintained in the University archives under the direction of the Chancellor.

III. Records Management Responsibilities

A. University Records Committee

The University Records Committee is a standing committee that governs the retention, and disposal of the University's records.

1. University Records Committee Membership

Membership in the University Records Committee includes:

- a. The General Counsel or designee (Chair);
- b. The University Vice Chancellor/CFO or designee; the University Associate Vice Chancellor of Academic Affairs and Student Services;
- c. The University Director of Records Administration;
- d. One campus Student Services Associate representing all campus/units registrars (annually appointed by the Chair of the committee); and
- e. One additional position (annually appointed by the Chair of the committee).

2. Responsibilities of the University Records Committee

Responsibilities of the University Records Committee include the following:

- a. Identify and evaluate which University records should be retained;
- b. Publish the Record Retention and Disposal Schedule, and periodically review it for compliance with University policy as well as local, state, and federal laws;
- c. Monitor local, state, and federal laws affecting records retention;
- d. Identify appropriate methods of disposal for various types of records;

- e. Assist with training of personnel responsible for record storage, maintenance, and destruction, as needed;
- f. In consultation with the Chancellor's Office, determine which University records have historical value, and are therefore to be kept in perpetuity;
- g. Collect data on campus, program, and system records digitization, storage, and destruction efforts; and make recommendations to the Provosts, Chancellor, and unit heads, based on the data received.

B. University Responsibilities

1. Each University administrative office is responsible for ensuring that the Record Retention and Disposal Schedule established by the University Records Committee is followed.
2. University-wide programs are responsible for ensuring that the Record Retention and Disposal Schedule established by the University Records Committee is followed.
3. University administrative offices, and academic programs that retain records for different periods of time other than defined by the Record Retention and Disposal Schedule, may do so only when submitted to, and approved in writing, by the University Records Committee, in consultation with the Office of General Counsel.
4. University administrative offices, and academic programs will prepare a list of major documentation used, and maintained, by the department, and will compare it to the documents listed in the Record Retention and Disposal Schedule. In addition, they will periodically review currently used records and forms, to determine whether these records and forms are adequate and appropriate, for the department's requirements. If there is no specified retention schedule provided for a particular document, questions about its appropriate retention, must be submitted to the Chair of the University Records Committee. prior to any document destruction.
5. University system administrative offices, and academic programs are responsible for creating, and following a digitization schedule, in accordance with this Policy, and reporting periodically to the University Records Committee, their progress under that schedule.

C. Campus Responsibilities

1. Each campus is responsible for ensuring that the Record Retention and Disposal Schedule established by the University Records Committee, is followed at their campus.
2. Each campus will also monitor state, and local laws, and regulations to ensure that these local requirements are adequately reflected in the Record Retention and Disposal Schedule, established by the University Records Committee.
3. Campuses that retain records for different periods of time than defined by the Record Retention and Disposal Schedule may do so only when submitted to and approved in writing by the University Records Committee, in consultation with the Office of General Counsel.
4. Each campus will prepare a list of major documentation used, and maintained by the campus and will compare it to the documents listed in the Record Retention and Disposal Schedule. In addition, each campus periodically, will review currently used records, and forms to determine whether these records and forms are adequate, and appropriate for campus requirements.
5. Campuses are responsible for creating, and following a digitization schedule, in accordance with this Policy, and reporting periodically, to the University Records Committee, their progress under that schedule.

IV. Records Retention and Disposal

A. General Guidelines

1. All campuses, and University units, are expected to digitize documents and records to replace paper copies, and to store these records in the designated University digital record repository.
2. Active, inactive, and historical records must be maintained in accordance with the Record Retention and Disposal Schedule, and this Policy. Expired Records must be destroyed, in accordance with this Policy.
3. The Record Retention and Disposal Schedule, designates the custodian for each identified University record.
4. If a record is not found under the Record Retention and Disposal Schedule, it should be destroyed, once it is no longer needed in the ordinary course of University business. The University Records Committee shall review the Record Retention and

Disposal Schedule, on a periodic basis, to assure alignment with best practices, and compliance with applicable regulations. However, if a University employee believes a record not listed on the Record Retention and Disposal Schedule should be retained, or that a University record should be retained, beyond the time period specified on the Record Retention and Disposal Schedule, the employee should not destroy such record, without prior written approval, of the Office of General Counsel.

5. If a record fits within two categories, each having a different retention period, the longer period governs. In order to facilitate compliance with this Policy, all record retention periods, expiring during a calendar year, may be extended, to the last day of such calendar year. Thus, all University records, expiring during a calendar year, must be destroyed, no later than the last day, of that calendar year.

B. Non-University Records

All non-University records (i.e. any recorded information that is not created, or received by a University employee, or department in the ordinary course of University business) should be immediately destroyed after use, unless it has historical value, or is subject to a litigation hold.

C. Copies of University Records

Departments, and employees, that are not the designated custodian, for an identified University record, are expected to retain copies, and drafts of such University record, only to the extent necessary, to conduct University business. Such University departments, and/or employees, must destroy such copies, or drafts, once they are no longer needed, to conduct University business, unless these records, are subject to a litigation hold. The designated custodian, for an identified University record, should only retain originals of inactive records, and destroy all copies, and drafts.

D. Suspension of Records Disposal

In the event of a governmental audit, investigation, or current or reasonably anticipated litigation, record alteration, and destruction may be suspended, at the direction of the Office of General Counsel. In addition, the Office of General Counsel, must be informed of any situation, that an employee reasonably expects, to give rise to legal action, as soon as the situation, becomes apparent. If there is any reason to believe, that a claim may be asserted, against the University, for which any University records, may be potentially relevant, such records, must not be destroyed, without the prior written approval, of the Office of General Counsel.

E. Security for Confidential Information

Departments must implement practices, that protect confidential information, contained in University records, in accordance with relevant laws, and University policies. Such protections, must be applied in maintaining active records, the storage of inactive and archival records, and the destruction of expired records. Thus, the level of security that applies to an active record, must be maintained, when such a record becomes an inactive, or archival record.

F. Destruction of Hardcopies

Antioch University, generally encourages, the digitization of hard copies of University records, and the subsequent destruction of those hard copies, with certain safeguards. The campus, program, or system, must retain the hard copy, of any active or inactive record, for at least 90 (ninety) days after its digitization. Normally, the campus, program or system, must destroy the hard copy, unless the hard copy is of historical value, or is protected by a litigation hold, within one year after its digitization. For documents with historical value, University archives will retain the hard copy. and the digitized copy in perpetuity; for documents protected by a litigation hold, the campus must retain the hard copy, and the digitized copy, until written notification by the Office of General Counsel.

G. Destruction of Expired Records

If the custodian believes that an expired record has historical value, and should be permanently retained as an historical record, the custodian must consult with the University Records Committee. Otherwise, all other expired records must be destroyed by the custodian in the following manner:

1. Hardcopy Destruction

Expired records in hardcopy form that do not contain confidential information should be recycled. Expired records in hardcopy form that contain confidential information should be shredded in a manner that renders them unreadable and that would prevent them from being reconstructed. Security should be maintained until proper destruction is performed completely

2. Electronic Records

- a. Digitized records held in the University digital records repository shall be automatically purged through the records disposal function.
- b. Emails and other electronic documents (e.g., Word documents, Excel, PDFs, etc.) should be deleted. The custodian should consult with the University Office of Information Technology to assure that the deletion process is complete and

permanent.

- c. Devices or other media that store electronic records (e.g., flash drives, CDs, etc.) should be destroyed in a manner consistent with media sanitization methods which may include disintegration, incineration, pulverization or melting. The type of sanitization required will depend on the type of device as well as the nature of the information contained in the device. Such destruction methods require trained professionals and should be conducted by authorized personnel. The custodian should consult with the University Office of Information Technology to assure that the deletion process is complete and permanent.

V. Schedule for the Digitizing of University Records

A. Digitization of Active Records

Campuses, programs and the University must digitize University records in the order of their relative importance to University operations. Records that have a retention lifetime of 3 years or less may be exempt from digitization if the campus or program assesses that the retention of these records in hard copy will not put undue hardship on University employees, facilities and/or space.

B. Implementation Schedule and Standard Operating Procedures for Digitization of Active Records

Campuses and programs must adopt an implementation schedule and standard operating procedures for the digitization of active records on the University's digital records system by September 1, 2012. The implementation schedule should include the priorities for digitizing particular kinds of documents, and deadlines for digitization. The standard operating procedures should include a description of who is responsible, what equipment will be used, and a schedule of when the digitizing will take place, whether it be daily, weekly, or monthly. Campuses and programs must submit the implementation schedule and standard operating procedures to the Chair of the University Records Committee upon completion.

C. Digitization of Inactive Records

Campuses and programs must have an implementation schedule for digitizing inactive records that are not scheduled for disposal before December 2015, and submit that implementation schedules to the Chair of the University Records Committee. The digitization of all applicable inactive records must be completed by December 2015. Campuses and programs that do not meet full compliance by December 2015 must submit to the Chair of the University Records Committee by February 1, 2016 an implementation schedule for digitizing all inactive records.

D. Digitization Report

In addition to the standard operating procedures and implementation schedules above, each campus and program must submit a periodic update to the Chair of the University Records Committee regarding the extent of the digitizing efforts for both active and inactive records at each campus and program. The University Records Committee will report periodically to the Office of the Chancellor regarding the extent of University-wide efforts to digitize active and inactive records.

E. University Naming Protocol

In order to ensure consistency across the system, the University Records Committee shall provide to campuses, programs, and the University administrative offices a procedure including a naming protocol to guide the retention of all University records. Campuses, programs, and University offices must comply with this procedure in the digitizing of all University records.