AMERICAN UNIVERSITY WASHINGTON, D.C.

University Policy: Records Retention and Disposal

Policy Category: Operational Policies

Subject: Retention, maintenance, and disposal of official university records

Office Responsible for Review of this Policy: Office of Finance and Treasurer

Procedures: American University Records Retention Schedule

Related University Policies:

I. SCOPE

This policy addresses the retention and disposal of the university's hard copy and electronic files and records, and applies to all university departments.

II. POLICY STATEMENT

American University requires records retention and disposal to be a standardized process. Access, maintenance, retention, and disposal procedures for university records must be followed by staff in designated official repositories.

In addition, duplicate or multiple copies of these records, retained in locations other than official repositories, must also be properly disposed of when they are outdated and no longer useful.

This policy is intended to ensure that the university:

- meets legal standards;
- optimizes the use of electronic and physical storage space;
- minimizes the cost of record retention;
- preserves the history of the university;
- destroys outdated and useless records.

III. DEFINITIONS

Archival Record: A record that is inactive; not required to be retained in the unit in which it originated or was received; and has permanent or historic value is considered an archival record. Archival records are retained and preserved indefinitely in the university archives.

Active Record: An active record is one with current administrative use for the unit that generated it. Records remain active for varying numbers of years, depending on the purpose for which they were created.

Non-Record: Records that are not considered university records include, but are not limited to; extra copies of original documents and publications kept only for convenience or reference, and blank forms.

Official Repository: The unit designated as having responsibility for retention and timely destruction of particular types of official university records. Such responsibility is assigned to the head of the unit or a designee.

Originating Department: The unit in which an original document was generated or received is considered the originating department.

University Archives: A component of the university library that promotes knowledge and understanding of the university's origins, aims, programs, and goals; and facilitates effective records management. This includes permanent retention of official records and reports of the university, its officers and component parts; maps and architectural records; audiovisual materials including still photographs and negatives, motion picture film, oral history interviews, audio and video tapes; and artifacts and ephemera documenting the university's history.

University Archivist: The individual responsible for 1) designing which official university records are archival; and 2) effecting the transfer of archival records from the unit in which they originated or were received to the university archives at such time and in the manner and form prescribed by the archives and subject to the appropriate retention and disposition schedules that are outlined in the university's records retention schedule.

University Record: The original copy of any record created or received in the course of university business, including, but not limited to; paper, e-mail, any type of electronic file or data, still photographs, motion pictures, minutes, agendas, policies, procedures, maps, drawings, plans/blueprints, any digitized magnetic tape, course syllabi, programs of campus events, video recordings etc.. Official repositories for these records are identified in the university's records retention schedule. University records are the property of the university and not of the officers, faculty members, or employees who create them or to whom they are entrusted.

IV. POLICY

A. Managing Official University Records

Since no one person or unit can be directly responsible for all campus records and files, users throughout the community share in the task of adhering to the retention and disposal policy. Units that maintain university records are called "official repositories." They are

responsible for establishing appropriate record retention management practices. Official records should be stored consistently within the unit in a manner that provides protection against misuse, misplacement, damage, destruction, or theft. Each official repository's administrative manager or a designee must:

- implement the unit's record management practices;
- ensure these management practices are consistent with the policy;
- educate the staff within the unit in understanding sound record management practices;
- ensure that records are retained in a readable format regardless of changes in technology or equipment obsolescence by 1) printing out the documents and saving to a file system, 2) maintaining the old equipment and software applications, or 3) migrating the records to a new technology;
- preserve inactive records of historic value, consult with university archivist and transfer those records to the university archives;
- destroy inactive records that have no archival value upon passage of the applicable retention period;
- ensure access to confidential files is restricted;
- ensure that outside vendors used for record storage follow the university's record retention policy.

The university's Records Retention Schedule lists the official repositories for university records as well as how long these records must be retained. Units that are not official repositories but retain duplicate or multiple copies of these university records should dispose of them when they are no longer useful.

[NOTE: In the event of a pending or expected lawsuit, claim, audit, program review or administrative charge, all relevant records, regardless of physical format, including e-mails, must be preserved and safeguarded until the litigation or proceeding has terminated and the time for all appeals has expired. You should contact the Office of General Counsel immediately if you have questions about this note.]

B. Preserving or Disposing of Official University Records

When permanent records become inactive, consult with the university archivist to determine if records should be transferred to the university archives, as an archival record, or permanently maintained in the unit where it originated or was received.

a. Permanent Records—Archival records may be transferred to the university archives when they become inactive. Call the university archives to:

    - Request records transmittal form from university archives
    - Upon approval of university archivist, transfer boxes to university archives
    - Permanent records that are not archival should be maintained within the control of the originating department.

b. All Other Records—If you have determined that it is appropriate to dispose of the records, destroy them in one of the following ways:

- Recycle non-confidential paper records
- Shred confidential paper records
- Delete all e-mails that are more than two years old, unless the record retention schedule specifies otherwise.

• **Caution**: Periodically review records that were generated and maintained in university information systems or equipment to ensure that these requirements are met.

C. Disposing of Electronic Records

The guidelines below are designed to ensure the proper disposal of all American University information on electronic devices or media in a manner that prevents inadvertent loss or disclosure. Steps must be taken so that AU information is not recoverable by conventional methods. Proper disposal of AU information and licensed software on electronic devices and media is also governed by other AU policies and applicable law. In addition, proprietary information may also be subject to the terms of sponsored research agreements, non-disclosure agreements, or license agreements. Unit administrators are responsible for making sure that the following guidelines are followed. Administrators may choose to contact the Office of Information Technology for additional assistance.

- The information on any computer hard drive, cell phone, Blackberry, or other electronic device must be erased and not recoverable before the equipment is reassigned within a unit. (Consult with IT for further information.)
- Outdated or broken computer equipment or other electronic devices cannot be discarded in dumpsters or regular trash containers.
- Electronic equipment, as described below, can be disposed of by calling x2349 to arrange pickup. Information contained within the equipment will be erased as necessary by AU's contracted disposal vendor.
- Any other electronic media record in a format not mentioned in the NOTE section below should be rendered unreadable by any other appropriate means (e.g., CD-ROM media, tape media, diskettes and zip disks, etc.).

NOTE: The university's outside vendor accepts the following for disposal or recycling: computer equipment, circuit boards, mainframes/servers, test equipment, connectors, cords, wire, fax machines, modems, audio/visual equipment, communication systems, printers, monitors, hard/floppy drives, memory, tape drives, laptops, bar coding equipment, cell phones, CD ROM drives, motherboards, plotters/copiers, PDAs, calculators, cameras, network/video/sound cards.

This policy and the associated retention schedule were developed after reviewing various record retention policies and schedules from leading universities and other authorities. They were then customized to reflect best practices at AU.

While the policy and schedule identify many of the records generated and retained throughout the university, they cannot cover every situation or anticipate future additions and modifications. Therefore, these are to be considered "living documents" that will be modified or changed as needed. They will be reviewed on an annual basis for corrections and to ensure compliance with current laws and regulations. You are encouraged to submit your suggestions for improvements to pat@american.edu.

V. EFFECTIVE DATE

This Policy is effective November 1, 2006.

Last reviewed January 2009; November 2010

VI. SIGNATURE, DATE, AND APPROVAL

This policy needs to be signed by the appropriate officer (listed below) before it is considered approved.

Approved:

CFO, Vice President and Treasurer