



Records Retention and Disposition Policy

I. Purpose

This policy provides for the consistent and systematic review, retention and disposition of records received or created in the transaction of Centenary University business. This policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records and to facilitate University operations by promoting efficiency and reducing unnecessary storage of records.

II. Scope

This is a University policy and applies to all University departments, administrators, faculty and staff.

III. Definitions

- A. **Record.** Any information, regardless of physical form or characteristics, made or received in connection with the transaction of University business in accordance with law or regulation. A record may include a document, correspondence, recordings, reports, studies, data maps, drawings, photographs or e-mail, whether in paper, electronic or other form.
- B. **Active Records.** Records that are needed to support the current business activity of an office or division.
- C. **Inactive Records.** Records for which the active period has passed and which are being held for the balance of the specified retention period.
- D. **Permanent Records.** Records that have long-term or permanent value to the University.
- E. **Records Manager/Compliance Partner.** An individual appointed by the Department Head or Department Director to oversee the administration of records management systems for an established business process.
- F. **Record Retention and Disposition Schedule.** An internal schedule that sets forth how records should be handled after the period of their active use.
- G. **Responsible Executive.** The designated Department Head or Department Director within an area who has the responsibility for implementing this policy.
- H. **Responsible Official.** The Division Head or Manager who has supervisory authority over a particular business practice and, in that capacity, has responsibility for ensuring effective implementation of this policy in his/her area of authority.
- I. **Retention Period.** The minimum required length of time for which a University office or division is responsible for maintaining records.
- J. **Records Destruction.** The physical or electronic destruction of a record after it has become obsolete or otherwise in accordance with this policy.
- K. **Disposition of Records.** The terminal treatment of records, either through destruction or permanent storage.

- L. **Electronic Mail (E-mail).** A computer to computer communication system that allows text-based messages to be exchanged electronically. E-mail sent or received over the University's computer system may constitute a form of University record. While all e-mails are not business records, all University e-mails are property of the University. The University has the right to view the e-mail of all members of the University community. E-mail does not need to be retained indefinitely. E-mail that is retained should be retained or disposed of in accordance with the University's record retention and disposition schedule for paper records.
- M. **Archive Folders.** Folders that permit the long-term management of University electronic records.
- N. **Litigation Hold.** A communication issued as the result of current or anticipated litigation, audit, government investigation or other similar matter that suspends the normal process regarding the retention and disposition of University records.

IV. **Policy**

It is the policy of the University to manage its records and ensure they are retained for the period(s) of time necessary to satisfy the University's business and legal obligations and are disposed of in accordance with an established records retention and disposition schedule. The records retention and disposition schedules applicable to different categories of University records are developed jointly by the user department and the University Compliance Partner for each division.

V. **Responsible Offices**

- . **Responsible Official.** Each Division Head (Responsible Official) has the responsibility to designate, in writing, a Records Manager in their office or division and ensure that the Records Manager understands and is following the records retention requirements applicable to that particular office. Each University office or division has primary responsibility for the proper care and management of its records.
- A. **A Records Manager** has day-to-day responsibility for ensuring the preservation of relevant records in his/her office or division. These responsibilities include organization of files, implementation of retention and disposition schedules, overseeing storage of inactive records and records disposition at the conclusion of the retention period. The Records Manager is the custodian for the user records, but does not own the records.
- B. **The Office of the Vice President of Business & Finance** is responsible for the notifying relevant members of the University community where a litigation hold is being implemented. The University's attorney will determine the scope of the hold, determine when the hold is no longer required and will communicate the lifting of the hold on an as needed basis to members of the University community.

VI. **Responsible Executive**

The Department Head/Compliance Partner responsibility to notify the individual departments of the retention periods of the departmental records, coordinate the on-campus storage of records, coordinate the transfer of records to an off-campus storage location and coordinate the eventual destruction of records.

VII. **Procedures**

- . **Accessibility and Safekeeping of Records.** Records, particularly financial records, must be easily retrievable for examination by authorized individuals, including auditors. Access to electronic records is subject to University rules regarding information security. Records Managers should work with the Information Technology Department to ensure that electronic records are maintained in a format that preserves accessibility. The Records Manager is responsible for ensuring that active and inactive records are secured in a way to provide appropriate confidentiality and protection from unauthorized access, theft and/or physical damage.
- A. **Litigation Holds.** Where the University has actual notice of litigation or of a government investigation or audit, or has reason to believe that such events are likely to occur, it has the obligation to take steps

to preserve records that might be implicated in such litigation or investigation. In such an event, the University will take steps to identify all paper and digitally maintained files that may contain records relevant to the case, including e-mails, and will notify members of the University community to preserve such records indefinitely. If an employee or faculty member receives such a preservation notice, it means that the record the University is required to preserve may be in the possession or under the control of that employee or faculty member who has an obligation to preserve such information effective immediately. In the event of a litigation hold, any guidelines calling for the destruction of those records are suspended by virtue of the litigation hold.

- i. Electronic information should be preserved in its original electronic form on the media on which it is stored. Electronic information should not be transferred from the media on which it is stored to a different media for the duration of the litigation hold unless such transfer is necessary to preserve the integrity of the electronic data, and such transfers should only be made after consultation with the Office of General Counsel and the Information Technology Department. In addition, the employee or faculty member that receives the notice should similarly preserve any new information that is generated, which may be relevant to the litigation or investigation by saving it in a segregated file.
- ii. An employee or faculty member's failure to preserve records after having received a litigation hold can have extremely serious consequences for the University. Accordingly, a failure to comply with a litigation hold will subject the employee to discipline, up to and including termination, and will be deemed misconduct that will subject a faculty member to discipline in accordance with the Faculty Guide.

B. **Destruction of Records.** The Records Manager is responsible for periodically determining which University records in his/her particular office or division have reached the end of their retention period and should be destroyed in accordance with the Record Retention and Disposition Schedule. The Responsible Officer is required to sign off on the destruction of records and coordinate the destruction of the records with the Compliance Officer, or an approved Records Management designate. The Records Manager should consult with the Information Technology Department, or an approved Records Management designate regarding the destruction of electronic records.

VIII. **Responsible Offices**

All University offices are responsible for administering, implementing and enforcing this policy with respect to the records generated and maintained by their respective offices.

IX. **Effective Date**

The effective date of this updated policy is September 2, 2016.

Retention Terms TBA

AC •••• After Completion
AT •••• After Termination
C •••• Current Year
AG •••• After Graduation
Lg •••• Life Of Grant
Lp •••• Life Of Product
Lu •••• Life Of University
Perm •••• Permanent
TEMP •••• Temporary
UE •••• Until Enrolled
Us •••• Until Superseded
Uta •••• Until Tax Audit
V •••• Vital Record
WA •••• While Active