Records Retention Policy Information
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University of Colorado Boulder
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Records Retention Overview – What is Records Retention?

Records retention is the systematic management of university documents designed to meet legal requirements, optimize use of space, minimize cost, preserve the history of the university, and destroy outdated and useless records, through the deliberate identification and retention of necessary documents and the destruction of outdated and useless records in a documented and secure process.
Records Retention Policy

In 2007, the University established a Records Retention Policy. This Policy was revised effective July 11, 2016. It establishes strict policies and procedures to ensure that university records are properly retained and disposed of in accordance with State and Federal laws.

CU System APS 2006 – Retention of University Records defines the principles and processes to follow:

Records Retention Policy

APS 2006 also defines:

- What is and is not an official record
- Who is responsible for records management and disposal
- Which methods for disposal are allowable, and
- References the campuses’ retention schedules, which detail the timeline for records retention
Records Retention Policy - Campus Records Management
Coordinators and Record Keepers

Campus records management coordinators are responsible for the development, coordination, implementation, and management of the records management program at their locations. They promulgate campus rules and procedures and provide advice, information and training, as necessary, regarding records management.

The UCB records management coordinator is Mark Berge, mark.berge@colorado.edu, 303-492-8909.

Record keepers, which can be individuals or units, are responsible for maintaining university records.
Records Storage – What is a University Record?

What is a University Record?
A university record is any form of recorded information, regardless of physical characteristics, that is created, received, maintained, or legally filed in the course of university business.

A university record does not include: Materials preserved or appropriate for preservation because of historical value of the materials; library books, pamphlets, newspapers, or museum material made, acquired, or preserved for reference, historical, or exhibition purposes; private papers, manuscripts, letters, diaries, pictures, biographies, books, and maps, including materials and collections previously owned by persons other than the state or any political subdivision thereof and transferred by them to the university; and non-records.
Records Storage – What is a non-record?

A non-record is an item that is of immediate value only. Non-records may share some characteristics with university records; however, they are distinguished from university records by their transitory usefulness. Non-records may include envelopes, routing slips, data entry- and work-sheets, rough drafts, multiple copies of publications, blank forms, unofficial (“informational,” “courtesy” or “convenience”) copies of records, and notes and audio recordings that have been transcribed. Non-records may also include duplicates that are maintained for convenience by a person or office who is not the originator or recipient (including copied recipient) of the record and electronic mail of temporary value.
Records Storage – Retention

Retention and disposal of records is required by C.R.S. § 24-80-101, et. seq. The University of Colorado follows these strict guidelines in order to meet legal requirements, optimize use of space, minimize cost, preserve the history of the university and destroy outdated and useless records.

University records must be categorized and grouped according to the functional purpose they serve.

The University of Colorado Boulder’s Records Retention Schedule at: [http://www.cu.edu/sites/default/files/RecordRetentionUCB.pdf](http://www.cu.edu/sites/default/files/RecordRetentionUCB.pdf) details the retention period for the various types of records.

It is important to note that departments are often not the official repository of records. This might imply that a departmental document is a record that should be sent to its proper repository, that it is a record that should be destroyed, that it is not a record, or that it is a non-record. Questions should be directed to the relevant official depository or to the campus records management coordinator.
Records Storage – Exceptions to the requirement to dispose of documents

Once the retention period set forth in the retention schedule has expired, university records shall be disposed of properly, unless:

a. Applicable law requires that the university record be retained for a longer period than set forth in the retention schedule;
b. The university record is subject to a pending request under the Colorado Open Records Act;
c. The university record is subject to a legal hold, has been requested in any legal proceeding or is deemed by legal counsel as likely to be requested in any legal proceeding;
d. The university record is needed to perform current or future activities in support of functions for which a unit is responsible;
e. The university record contains evidence of legally enforceable rights or obligations of the university; or
f. The university record is needed to fulfill statutory and regulatory requirements.
Records Storage – Creation of unit-specific retention periods

If no retention period is established by the campus retention schedule or through the exceptions to the disposal requirements noted above, units may create their own schedules in accordance with a unit’s needs. Additionally, units may specify retention periods that are longer, but not shorter than the campus retention schedule. Any unit-specific schedule shall be maintained in writing.
Records Storage – Designate a Records Keeper

Departments and units should:

• Designate a staff member as the records manager for the unit

• Establish a records management process for storage, labeling, and organization of official records

• Review and dispose of appropriate official records, at least annually, according to the campus schedule and any unit-specific retention schedule.
Records Storage – Electronic storage of files

The retention period is satisfied by retaining an electronic form of a record. Per APS 2008 – Electronic Signatures and Transactions, if a law requires that a record be retained or retained in its original form, an electronic record of the information is sufficient if it accurately reflects the information in the original record and remains accessible for later reference.

University records shall be maintained in a medium owned or controlled by the university unless a unit has received approval to use an outsourced IT service provider from the appropriate Chief Information Officer/Chief Technology Officer or Campus Information Security Officer.
Records Disposal Procedures

When the prescribed retention period for a university record has passed, the university record should be archived or destroyed. If there is no prescribed retention period, the university record shall be archived or destroyed when it has outlived its usefulness as determined by the record keeper.

The means of disposal may be determined by the unit in possession of the university record but must take into account the nature of the record’s contents. Confidential or personal records, e.g., records containing personally identifiable information, trade secrets, personal or sensitive financial information, research results, or records subject to any privilege, such as attorney-client, shall be rendered irretrievable and illegible by shredding or by other means.

Non-records may be disposed of at the discretion of the record keeper. Confidential or personal non-records must be rendered irretrievable and illegible as above.

Records disposition logs must be filed after document destruction. Please see http://www.colorado.edu/controller/resources/records-retention for a list or resources and contact information.