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University of Massachusetts
Records Management, Retention and Disposition Guidelines

Students, staff and management rely heavily on the records generated as a result of the business and operation of the University of Massachusetts (the University). These records document ideas and activities, help the University better serve its mission, assist management in its decision making and act as an archive of the University's and the surrounding community's history. Records, like any vital resource, also have an intangible monetary value. Because of the tangible and intangible value of the University records it is critical that they be properly and securely managed, disposed of, preserved and/or archived.

Additionally, as an agency of the Commonwealth of Massachusetts, the University is obligated by state law to cooperate with the Office of the Commonwealth Secretary in the development of a program regulating the retention and disposition of its records. A campus records management program serves other purposes as well. It improves office efficiency, facilitates administrative access to stored as well as active records, and captures for the Archives those records deemed of lasting significance.

I. PURPOSE

These Guidelines are issued pursuant to the Board of Trustees' Record Management, Retention and Disposition Policy_(Doc. T99-061 adopted August 4, 1999) and:

- a. Outline the University's requirements for its Records Management & Retention Program including records creation, maintenance, organization, use, security, disposal, and archive.
- b. Outline responsibilities related to records management, preservation, retention and disposition.
- c. Provide methods for monitoring, enforcing and dealing with exceptions to these Guidelines.
- d. Provide for the creation and review of schedules of records retention and disposition.

II. SCOPE

These Guidelines:

- a. Are based on the laws of the Commonwealth of Massachusetts, the United States and other regulatory agencies. Policies and guidelines may impose certain restrictions that are not specifically covered by state and federal law, or other regulations.

- b. Shall not be construed to be inconsistent with any contractual obligation of the University.
- c. Apply to all records commonly and individually created and maintained by the University and its Campuses (i.e. student, research, financial, medical, payroll/personnel, general etc.).
- d. Include all University records regardless of the medium on which they reside (e.g., paper; fiche; in electronic form on tape, cartridge, disk, CD-ROM, or hard drive; etc.) and regardless of form (e.g., text, graphics, video, voice, drawings, etc.).
- e. Apply to all employees of the University of Massachusetts.
- f. Refer to all record categories (Official, Convenience, Internal) as defined in the University Data and Computing Guidelines/Standards Definitions, which may or may not include various record types such as: financial, legal, medical, student, and personnel.
- g. Comply with the applicable federal and state laws which govern the privacy, confidentiality and public nature of some records, including the Massachusetts Public Records Act, M.G.L. c. 66, and Mass General Law Chapter 4, section 7. If these Guidelines conflict with any applicable law, the law takes precedent and will apply.

III. RESPONSIBILITIES

The President's Office, together with the Chancellors, will determine which University department(s) shall be responsible for the implementation and oversight of a University Records Management, Retention and Disposition Program in accordance with these Guidelines.

The President, or his/her designee, shall appoint a Central Administrative Services records administrator and archivist.

The Chancellor of each campus, or his/her designee, shall appoint a Campus records administrator and archivist.

The records administration and archival functions may be assigned to the same area/individual or different areas/individuals.

The Central Administrative Services and Campus records administrator(s) will:

- a. Ensure compliance with state law with reference to the preservation of state records.
- b. Ensure compliance with these Guidelines and its related University Records Retention & Disposition Schedules.
- c. Jointly determine which University records are Institutional records.
- d. Jointly develop and ensure the implementation of an organization and filing procedure for Institutional Records.

- e. Jointly review and update the University Records Retention & Disposition Schedules as the University environment and business needs change, as new types of records are created, or as specific types of records become obsolete.
- f. Jointly designate an Official Record Custodian (ORC) from specific University departments for Official Records. For example, the Procurement Department might be the ORC for Purchase Orders and Requisitions.
- g. Work with University departments to develop departmental retention and disposition schedules for internal records not addressed in the University schedules.
- h. Work with the Central Administrative Services and Campus records archivists to ensure that records scheduled for disposition are reviewed to determine if the records have continuing administrative or historical value. Records which have been determined as having such value shall be designated for archival retention, while other records will be transferred to the Commonwealth or other state agencies as required by law, or properly disposed of.
- i. Work with the Central Administrative Services and Campus records archivists to prepare and maintain a records management “manual” outlining procedures to: ensure the security of Original Records; protect irreplaceable or vital records from destruction; designate Official Records Custodians for new records; ensure that Original Records are organized in an efficient and accessible manner; ensure that Original Records are reviewed prior to disposal to determine whether they are archival records; transfer records, in whole or in part, from the Original Records Custodian to the appropriate archive; provide for periodic inventories of University Records; and assist campus departments in complying with these Guidelines and its Schedules.

The Central Administrative Services and Campus records archivist(s) will:

- a. Ensure compliance with state law with reference to the preservation of state records.
- b. Ensure compliance with these Guidelines and its related University Records Retention & Disposition Schedules.
- c. Work with the Central Administrative Services and Campus records administrators to ensure that records scheduled for disposition are reviewed to determine if the records have continuing administrative or historical value. Records which have been determined as having such value shall be designated for archival retention, while other records will be transferred to the Commonwealth or other state agencies as required by law, or properly disposed of.
- d. Jointly determine where the University and Campus records archives will be located.
- e. Ensure that archival records are properly transferred to the appropriate archival storage facility.

- f. Ensure that archival records are stored in a facility with proper environmental (e.g., light, temperature, humidity, air quality, handling, etc.) and security controls so that the records are and remain accessible and readable by authorized personnel.
- g. Ensure that archival records are periodically copied so that their quality and readability are maintained. This is especially critical when the record is on magnetic media, film, or fiche.
- h. Work with the Central Administrative Services and Campus records administrators to prepare and maintain a records management “manual” outlining procedures to: ensure the security of Original Records; protect irreplaceable or vital records from destruction; designate Official Records Custodians for new records; ensure that Original Records are organized in an efficient and accessible manner; ensure that Original Records are reviewed prior to disposal to determine whether they are archival records; transfer records, in whole or in part, from the Original Records Custodian to the appropriate archive; provide for periodic inventories of University Records; and assist campus departments in complying with these Guidelines and its Schedules.
- i. Maintain a brief catalog, or list, of archived records and their location.

The Central Administrative Services records archivist will act as the Records Liaison Officer to the state Records Conservation Board (RCB).

The Campus records administrator will develop organization and filing procedures for all non-Institutional Records on their campus.

Records Creation and Classification

When a record is created, the creator must assign two classifications to the record: a data security classification based on the University levels of data classification, and a retention designation based on legal, administrative, research and historical requirements.

Levels of University data classifications have been established. Please refer the University Data and Computing Standards for more information.

Retention designations have been established and are detailed in the Retention and Disposition section of these Guidelines.

When an Official Record is created, the appropriate department will request the designation of an Official Records Custodian for that record from the appropriate records administrator.

Records Organization

Records organization is one of the most important components of records management having a major effect on information accessibility and staff productivity. Records management involves the arrangement of information/records, the process that leads to filing information/records and the equipment/facilities in which the records are stored.

Records administrators and archivists will work with University Departments to develop records management procedures for Original Records which result in efficient, economical, and accessible records organization. These procedures should include but are not limited to: determining how records should be organized; what records should be filed; how inactive records leave the file and get reviewed by the records administrator and archivist; how records determined to be archival get transferred to the appropriate archives, and how records are stored while in the file.

Records Security - Access, Use and Storage

Records are made up of data. Records security, which includes access, use, storage and disposition, is based on the classification of the data in the record as outlined in the University Data and Computing Standards.

Records Retention, Disposition and Destruction

Convenience records do not have to be retained. Proper destruction procedures (based on the data's classification) should be followed when destroying convenience records. All departments and employees of the University are required to adhere to the University Records Retention & Disposition Schedules.

The University Records Retention & Disposition Schedules refer to retention periods for Official and **retained** Convenience Records; however the review of records for determination of archival "status" will be performed on Official Records only. Official Records Custodians must obtain approval for the transfer/destruction of records for which they are responsible from the appropriate records administrator and archivist.

Records containing mixed retention periods shall be retained for the longest retention period.

The retention periods prescribed in the University Records Retention & Disposition Schedules are based on fiscal years (July 1st to June 30th) unless otherwise noted and are exact retention periods, which means that the department **must** keep a record at least as long as the schedule retention period (minimum), **but no longer** (maximum).

Notwithstanding a maximum retention period, records related to or involved in litigation, criminal or civil investigation, audit, or needed for ongoing administrative purposes shall be retained as required (i.e., you may keep these records longer than their maximum retention period). There is **NO** exception to the requirements for the minimum retention of a record.

Retention period designations used in the University Records Retention and Disposition Schedules are:

- a. **Permanent** - records which will be kept indefinitely, or at least 100 years. This designation is given to all records that the Central Administrative Services or Campus records administrator and archivist have determined as having continued historical or administrative value. Most records with a permanent retention period are transferred to the University or Campus archives when they become inactive. In a few instances, however, records with a permanent retention period are maintained in the offices of the ORC.
- b. **Until Superseded** - records that are routinely updated or revised and where the previous version has no continuing value.
- c. **Specific** - records that will be kept for a specified number of years.
- d. **Temporary** - records that do not fall into the other retention designations. These records should be disposed of after 6 months from the last date of entry on the record.

All Official Records must be reviewed by the appropriate records administrator and archivist, or his/her designee, prior to disposal.

Records copied to a more permanent medium (e.g., from paper to optical disk, etc.) should be transferred to the appropriate records archivist for destruction.

Records Archiving

The records administrator and archivist will coordinate the transfer of records designated for archival retention from the Official Record Custodian to the appropriate archive.

Records in archive must be accessible regardless of medium (e.g., paper, electronic, microfilm, fiche, etc.) or type (e.g., audio, video, text, graphic, etc.). This means that not only do the records have to be available but the means to read the records (i.e., the program to access an electronic record must be able to run on current technology) must be available.

Records in archive should be copied periodically to ensure that their quality and readability are maintained. This is especially critical when the record is on magnetic media, film, or fiche.

Records pertaining to state funds must be sent to the State Archives for storage according to the Disposal Schedule established by the State Comptroller.

The Records Conservation Board (RCB) is responsible for authorizing the transfer, destruction or sale of records of the Commonwealth. The Central Administrative Services records archivist will coordinate the transfer of University related records of the Commonwealth to the Records Conservation Board. (See the State Agency Records Management Manual from the Office of the State Comptroller for more information on records of the Commonwealth)

COMPLIANCE AND ENFORCEMENT

University employees in violation of these Guidelines and the corresponding Retention & Disposition Schedules may be subject to, where appropriate, reprimand, suspension, dismissal, or other disciplinary action.