

University of Massachusetts  
Records Management, Retention and Disposition Standards

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 part of a comprehensive records management program that ensures all University records are properly and securely managed, replaceable (in the case of vital records), disposed of, preserved and/or archived.

A University records management program serves other purposes as well. It improves office efficiency, facilitates administrative access to inactive as well as active records, ensures the consistent maintenance of records, decreases operational costs, increases staff productivity and assists the University in meeting legal and regulatory standards. Obsolete records impede access to current records, pose a possible legal liability, and waste valuable space.

**PURPOSE**

These Standards are issued pursuant to the Board of Trustees' [Policy Statement Record Management, Retention and Disposition](#) (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. Define criteria for the identification of vital records and the requirements for the maintenance, security and handling of vital records.
- c. Provide for schedules of records retention and disposition.
- d. Outline criteria for the conversion of retained or archival records to a different medium (e.g., paper to fiche or scanned documents).

**SCOPE**

These Standards:

- a. Are based on the laws of the Commonwealth of Massachusetts, the United States, and other regulatory agencies. Additionally, these Standards 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 Standards conflict with any applicable law, the law takes precedent and will apply. University policies/guidelines or campus procedures 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/or 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; scanned documents, 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, etc.) as defined in the [Data and Computing Definitions](#), which may or may not include various record types such as: financial, legal, medical, student, and personnel, etc.
- g. Function in conjunction with other University data and computing guidelines/standards including the [Responsible/Acceptable Use of Computing and Data Resources](#); [Data/System Administrator Responsibilities and System Requirements](#) and the [University Data and Computing Standards](#).

## **RESPONSIBILITIES**

The University and Campus records administrator(s) appointed by the appropriate CIO shall:

- a. Ensure compliance with state law with reference to the preservation of state records.
- b. Ensure compliance with these Standards and related 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 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.
- f. Work with University departments to develop departmental retention and disposition schedules for internal records not addressed in the University schedules.
- g. 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.
- h. 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 Standards and its Schedules.

The University and Campus records archivist(s) appointed by the appropriate CIO shall:

- a. Ensure compliance with state law with reference to the preservation of state records.
- b. Ensure compliance with these Standards and their 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 Standards and its Schedules.
- i. Maintain a brief catalog, or list, of archived records and their location.

The University 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 MANAGEMENT**

All University administrative records are owned by the University Board of Trustees regardless of their physical location, even when in the possession of individuals.

University records may not be permanently removed from the University or destroyed except in accordance with approved record management, retention and disposition standards and schedules.

Records management is a joint responsibility of the record creator and users. All University employees who handle University records are responsible for knowing and following laws (e.g., Public Records, FERPA, etc.), University policies, guidelines/standards and campus procedures that govern these records.

Records management consists of 3 basic stages:

- Creation
- Use
- Disposition

## **RECORD CREATION**

When a record is created, the creator should consider the following:

- Is the new record an Official Record?
- What is the type of data included in the record being created?
- How should the record be handled and stored?
- Do any laws or regulations dictate a specific retention period?
- Barring any legal/regulated retention period, when will the information on the record be no longer useful?

Based on the answers to these questions, the record creator shall assign two classifications to the record:

- a *data security classification* based on the University levels of data classification, and
- a *record retention designation* based on legal, administrative, research and historical requirements.

Neither the format of the record (e.g., memo, email, voice recording, etc.) nor the medium on which it resides (e.g., paper, fiche, audio, video, electronic, etc.) determines the records data security classification. For example, emails may be just as confidential as formal, typed letters.

When a new Official Record is created, the appropriate department will request the designation of an Official Records Custodian (i.e., ORC) from the appropriate Records Administrator if one does not currently exist for the class (i.e., a series of similar records such as accounting records or payroll records) the new records applies to (e.g., if a new Official Record is part of a personnel file, the existing ORC for personnel files would apply). The record creator's department may or may not be the ORC for the created record.

An Official Records Custodian (i.e., ORC) is the department responsible for the maintenance of the official University records of a specific class (e.g., the Controller's Office is responsible for the maintenance of official University financial records). ORC's also ensure that University records management, retention and disposition standards (e.g., record security, management, disposition, preservation/archive, etc.) are implemented for the records under their responsibility and that staff within the ORC department understand University record management standards and best practices. Most Official Records under the responsibility of an ORC are stored in that ORC's location however, the records may be stored elsewhere.

### o **Data Security Classification**

Records are made up of data. Record security, which includes access, use, storage and disposition, is based on the classification of the data in the record. If a record contains data of multiple classifications, the record will be assigned the most secure data security classification level. As detailed in the Data Classification Requirements section of the [University Data and Computing Standards](#), University records are classified as:

- **Unclassified** - data that does not fall into any of the other data classifications noted below. This data may be made generally available without specific data custodian approval.
- **Operational Use Only** - data whose loss, corruption or unauthorized disclosure would not necessarily result in any business, financial or legal loss BUT which the University had determined is critical to its business and requires a higher degree of handling than unclassified data. Access to Operational Use Only data is available to data custodian approved users only.
- **Confidential** - data whose loss, corruption or unauthorized disclosure would be a violation of federal or state laws/regulations or University contracts (i.e., protected data); personally identifiable data; data that involves issues of personal privacy; or data whose loss, corruption or unauthorized disclosure may impair the academic, research or business functions of the University, or result in any business, financial, or legal loss.

Many records are created during "normal administrative practices" (i.e., administrative practice records) and are either for extremely short-term use (i.e., transient records such as calculations) or contain unimportant information. Additionally, many records are received from external sources (e.g., advertisements, vendor sales materials, etc.) that have no significance to the University or its records needs and therefore retention of these materials is unnecessary.

The majority of administrative practice records will have a data security classification of Unclassified and include:

- Superseded vendor manuals or instructions.
- External reference materials including catalogs, periodicals and trade journals.
- Information copies of press cuttings, press statements, informational bulletins or publicity materials.
- Letters of appreciation or sympathy, or anonymous letters.
- Calendars, office diaries and appointment books (unless identified as historically important information).

- Rough drafts of reports, draft correspondence, notes, routine or rough calculations including only data with an unclassified security classification.
- Routine e-mail or telephone messages not including any data other than unclassified data.
- Ephemera determined not to have any historical value.
- Work procedures, office assignments, and work schedules.
- Letters of transmittal (e.g., transmittal of faxes).
- Blank forms kept for supply purposes.
- Personal or private papers neither created nor received in connection with University business (e.g., birthday cards).

Records that are already in the public domain and/or available via a web site or published document such as mission statements, charters, constitutions, ordinances, statutes, regulations, procedures, published directories, published reports, press releases, timetables, presentation materials, published course catalogs and outlines, accepted theses, publicity material, published surveys or circulars, and data which has been anonymised, also have a data classification of Unclassified.

Personal notes of employees are NOT subject to public record statutes, and can be maintained personally, not in "official" files.

If there is any doubt about which data security classification or retention designation data falls into, contact the appropriate Official Record Custodian.

#### o **Record Retention Designation**

Record retention period designations are assigned according to legal, fiscal, historical and administrative values and requirements. Record retention designation requirements are documented on Record Retention and Disposition Schedules.

The retention periods prescribed in the Record 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) unless impractical or unfeasible to do so. Variances in retention should be approved and document by the Records Administrator as part of a Department's Record Retention and Disposition Schedule. Official Records Custodians and holders of Convenience duplicate or multiple copies of expired records must appropriately dispose of these expired records within 3 months after the retention period is met. The maintenance of records beyond the retention requirements set forth in the University Record Retention & Disposition Schedules presents a significant risk to the security and integrity of sensitive and confidential data, and increases the Universities legal liabilities.

Two Types of Record Retention and Disposition Schedules can be in place at the University:

- a. [University Record Retention and Disposition Schedules](#) – schedules that pertain to commonly used University-wide records (e.g., accounting, personnel, student records, etc.). To reduce confusion and take advantage of a supported resource, the University has elected to follow the applicable sections of the current [Massachusetts State-wide Records Retention Schedule](#). Note that the University is only

following the Record Retention Schedule. Sections addressing important points, special notes, filing plans, glossary of special terms and forms shall not be applied to University records. The Schedule applies to all University maintained records regardless of the department or campus at which they are created and/or maintained, and apply to Official and **retained** Convenience copies, duplicate and multiple copies of records.

The majority of administrative practice records may not be included in the Records Retention Schedule because they are not stored for long term use and have been assigned a record retention designation of Transient or Temporary.

- b. Departmental Record Retention and Disposition Schedules – schedules that pertain to records created and used within a single department and not already included in a University Record Retention and Disposition Schedule.

No records list can be exhaustive and all inclusive. Questions regarding the retention period for any specific record or class of records not included in these schedules should be addressed to the appropriate Records Administrator or University legal counsel.

Record retention designations assigned to records and used in both University Record Retention and Disposition Schedules and Departmental Record Retention and Disposition Schedules are:

- **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 that are not actively being used/referred to should be transferred to the University or Campus records archive. Records with a permanent retention period that continue to be used or periodically referred to may, however, be maintained in the offices of the ORC. Note that regardless of where the Permanent record is stored, the record 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
- **Until Superseded** - records that are routinely updated or revised and where the previous version has no continuing value.
- **Specific** - records that will be kept for a specified number of years. The Retention and Disposition Schedule notes the specified number of years.
- **Temporary** - records that need to be retained for a short period and that do not fall into the other record retention designations. These records should be disposed of after 6 months from the last date of entry on the record. These records have such a short retention period that they may not be included in University/Department Record Retention and Disposition Schedules.
- **Transient** - records that do not need to be retained because they are used to create other retained records (drafts, notes, etc.) or whose content has no importance or relevance to University business

or history (e.g., external advertisements, vendor sales materials, etc.). These records are of such an extremely short term or irrelevant nature that they are not included in University/Department Record Retention and Disposition Schedules and should be immediately disposed of.

University employees are required to comply with and reference University/Department Record Retention and Disposition Schedules to determine the length of time a particular class of records must be maintained, and the final disposition of a record.

Convenience records, multiple copies or duplicate copies do not have to be retained however, if they are retained their management/handling must comply with University records management standards, and they can not be retained longer than the retention period detailed in the University Record Retention and Disposition Schedules.

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. There is **NO** exception to the requirements for the minimum retention of a record.

Individuals involved in the retention and disposition of Official Records of the University of Massachusetts should be aware that it is a federal crime punishable by fine and 20 years of imprisonment to knowingly destroy, alter, or cover up a record with the intent to impede, obstruct, or influence an investigation or the administration of any matter within the jurisdiction of any department or agency of the United States.

The record retention periods may change as University or departmental functions change and become more diverse, as laws changes, and as new classes of records are created.

## **Vital Records**

### **o What is a Vital Record?**

A record is vital when it contains information needed to: establish or maintain continuity of operation in a University office, department, or campus; recreate the University's legal and fiscal records; or to preserve the rights of the University, its Board, faculty, staff, and/or students. The inability to recreate an authentic replacement of a lost or unavailable vital record would so adversely impact the University that extraordinary precautions are required to preserve and protect these records from both normal and unusual hazards, present and potential. The number of truly vital records should be very small in relation to total records held in any department or campus. It should be noted that vital records follow the same retention and disposition schedules used for all record types. The fact that a record is considered vital does not necessarily mean that its retention is permanent. Data Custodians, in conjunction with the appropriate Records Administrator, identify records as vital.

There are two types of University vital records:

- **Records which are essential to the protection of the rights of individuals.** These include, but are not limited to: current payroll records necessary to pay employees; master student academic records necessary to show completion of course work; and employee service records required for protection of tenure and retirement status.
- **Records which are essential to the protection of the University's rights, assets, and/or the execution of its public (contractual) obligations.** These include, but are not limited to: drawings and specifications required to repair and maintain the University's facilities; records necessary to establish University ownership of buildings, equipment, and land; patent license agreements; and promissory notes and evidence of other receivables.

○ **Pre-identified vital records**

The list of University records considered to be vital can be found in [Attachment 1](#).

Departments maintaining Official Records considered to be vital records shall ensure they are protected in accordance with these Standards. This list of pre-identified vital records is not intended to be all-encompassing. For questions regarding vital records contact the Records Administrator.

○ **Methods of Protection of Vital Records**

When determining the best way to protect vital records, Records Administrators and ORCs should consider the:

- Effectiveness of the protection method to the cost of that protection.
- Need for accessibility - Vital records that need to be available for use at all times may require different methods of protection from infrequently used vital records.
- Length of retention - Vital record retention may be short-term, long-term or permanent and the most appropriate method of protection may differ based on the assigned retention period.
- Record Medium - Susceptibility of records to destruction from heat, water, chemicals, and aging varies depending on what medium the record was created on. Magnetic tape, microfilm and paper documents require different protection to ensure they are usable.

There are six methods of records protection that may be used to preserve vital records. Multiple methods can be used to protect the same types of vital records (i.e., the active financial records can be protected via the existence of duplicates while inactive portion through the preservation of computer data that can be used to reconstruct a document). If it is not feasible to implement methods 1, 2, 3, or 4, method 5 or 6 should be used to provide at least a minimum level of protection.

1. Preservation of existing duplicate copies at another location. Many records already have a form of "natural protection" because of the regular paperwork routine (e.g., equipment records at the Property Office and ordering departments). If such duplicates exist for a vital record class the preservation of those duplicates is a very effective protection. The likelihood of both copies being destroyed at any one time is extremely low. This method is equally effective for long- and short-term retention, durable or fragile records, and high- or low-access requirements.

2. Creation of special duplicate copies for preservation at another location. Special, duplicate "security" copies of many University records classes may be created via carbon copies, photocopying, microfiching, magnetic tape backups, scanning, etc. This kind of protection is as effective as method 1 however, the cost of creating duplicate copies is relatively high.
3. Preservation of source records which would be used to reconstruct vital records. In many cases information which is the source for vital records (e.g., data stored in the Human Resources system) are held by the University or by another agency (e.g., grant/contract). If such sources can be identified and agreements made on holding them for the length of time protection is required, this method of protection can be nearly as effective as maintaining actual document copies. Effectiveness is reduced only slightly because several sources may be involved, any one of which might be destroyed. The overall cost of this method may be higher than the use of "natural protection" copies because larger volumes of source records may need to be retained for longer periods than may ordinarily be the case. The cost of this method, however, will usually be much less than the cost of creating special duplicate security copies.
4. Storage in special equipment such as fire resistant cabinets, safes, or vaults. Original and unique copies of vital records can be protected from most hazards through the use of special storage equipment. While the protection is not absolute, its relative effectiveness is only slightly lower than the first three methods. The use of special storage equipment is usually the most costly of all preservation methods and should only be considered when the other 3 methods above are not feasible.
5. Removal of hazardous conditions from area of storage. By removing unnecessary hazards such as combustible materials and steam or water pipes and by eliminating undesirable conditions such as air-borne chemicals and extremes of heat or humidity, a relative improvement can be achieved in protection of records. Since the effectiveness of this method is low, it should be considered only when other methods are not feasible.
6. Relocation of records to a less hazardous area. Because of differences in construction and use, some University buildings are less hazardous for records storage than others. The effectiveness of relocation can be equal to or slightly better than that for removal of hazardous conditions. Cost will be equally low. However, when requirements exist for frequent access to the records, this method may prove unfeasible. If relocation is considered, the campus Record Administrator should be consulted to determine the environmental controls and security of various storage options.

## **Records Use**

Records organization is one of the most important components of records management having a major effect on information use, accessibility, staff productivity, and the effective management of records from creation to disposition. Records storage and retrieval involves the arrangement of information/records, the process that leads to storing information/records, the equipment/facilities in which the records are stored and the process used to retrieve the records.

Records Administrators and Archivists will work with University departments to develop records storage and retrieval procedures which result in:

- Efficient, economical, secure and accessible records organization.
- The department's ability to effectively and properly maintain and dispose of records on an ongoing basis.

These procedures should include but are not limited to determining: what records should be retained and stored; how records should be organized in storage so that they are properly secure and accessible; how inactive records (i.e., records within their retention period but that are not used within a one year period) are stored; how "expired" records (i.e., records meeting their retention period and ready for disposition) leave the file and get reviewed by the Records Administrator and Archivist for proper disposition; and how non-archived expired records are appropriately disposed of (i.e., recycle, destroy).

The ORC, in conjunction with the campus record administrator and University legal counsel, may determine that specific records (e.g., those with a 10 year or Permanent retention period, or those related to a legal investigation or audit) should be converted to another medium (e.g., microfiche, scanned document). In determining whether an archived record should be converted to another medium the following criteria should be considered:

- Legality of converting original record to another medium.
- Original medium of record and its vulnerability to compromise.
- Historical nature of the record.
- Length of record retention (i.e., conversion is favored for long-term or permanent retention records).
- Need for accessibility.
- Available space for record storage (conversion to another medium may save space).

Official Records copied to a more permanent medium (e.g., from paper to optical disk, etc.) shall be transferred to the appropriate records archivist so that the original records can be properly destroyed.

For more detailed information regarding University data security and classification requirements, refer to the Data Classification Requirements section of the [University Data and Computing Standards](#).

### **Records Disposition**

It is critical that disposal of "expired" records is performed on a timely basis as failure to do so can lead to unnecessary expenditure of resources (e.g., space, staff time) and liability (e.g., requests for information under statute or legal proceedings). As previously noted, all Official, Convenience, duplicate and multiple copies of expired records shall be properly disposed of within 3 months of the record retention period being met.

When an Official record(s) has/have met its/their designated retention period in the appropriate University Record Retention & Disposition Schedule, the ORC shall review the record(s) to determine if it/they have an archival "status" (i.e., have continuing administrative, research or historical value, or document the University's organization, functions, policies, decisions, procedures, or operations). 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. Convenience records that have reached their designated retention period will be appropriately destroyed.

Official Records Custodians must obtain approval for the transfer/destruction of records for which they are responsible from the appropriate Records Administrator and Archivist.

- **Non-Archival Records**

After review by the appropriate Records Administrator and Archivist, or their designee, Official Records that are determined to be non-archival records shall be transferred to another entity (i.e., Office of the Commonwealth Secretary, granting agency, etc.) if required by law or contract, or properly disposed of (e.g., recycled, destroyed) in accordance with the classification of the data contained on the record. Transfer of Official Records to another entity will be processed on that entities form, or if none exists, on the [University of Massachusetts Archive Transfer Request \(Attachment 2\)](#). Disposal of Official Records shall be documented on a [University Record Disposal Form \(Attachment 3\)](#).

- **Archival Records**

Depending on the disposition noted in the corresponding Record Retention and Disposition Schedule, acceptance of Official Records at disposition time by a campus or university Archivist may be either optional or required. If the Record Retention and Disposition Schedule notes that the document is archival, it will automatically be transferred to archive. If the schedule notes a retention period of permanent, the Official record(s) may be transferred to archive after a period (e.g., after 10 years) determined by the ORC and Record Administrator.

All other Official records shall be reviewed by the appropriate Records Administrator and Archivist, or their designee. Official Records that are determined to be archival records shall be transferred to the appropriate archive. The Records Administrator and Archivist will coordinate the transfer of archival records from the Official Record Custodian to the appropriate archive. Transfer of Official Record shall be requested on a [University of Massachusetts Archive Transfer Request](#). Official Records transferred to archive continue to be the property of the Board of Trustees.

Access to and security of records in archive continues to be based on the data security classification of the record. Access to Operational Only and Confidential records require ORC approval.

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. Record conversion to another medium may be desired for archived records. As previously noted, the ORC, in conjunction with the campus record administrator and University legal counsel, determine whether specific records should be converted to another medium based on the criteria noted above.

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)

○ **Record Destruction**

All non-archival Official, convenience, duplicate or multiple copies of records that are scheduled to be destroyed must be destroyed in accordance with the record's data security classification. Unclassified and Operational Use Only records may be recycled. Confidential records must be destroyed by the following methods depending on the medium (e.g., paper, microfiche, disk, etc.) on which they were created:

- cross-shredding,
- chemically destroying or incinerating in an environmentally safe method,
- Degaussing, pulverizing, cutting or wiping electronic files or media (e.g., tapes, cdrom, hard drives etc.)

When contracting with an external entity for record destruction, the contract should specify destruction measures consistent with these standards and should provide for some form of compliance monitoring and verification of record destruction.

## **COMPLIANCE AND ENFORCEMENT**

Compliance and enforcement information is detailed in the University [Responsible/Acceptable Use of Computing and Data Resources](#) and other [Data and Computing](#) documents.