

How Long Do I Need to Keep This Stuff?

An Overview of OSU's Records
Retention Policy

OSU Training Days – Oct. 27-28, 2015

Follow Along Online

<http://scarc.library.oregonstate.edu/records-management.html>

PDF of Presentation

Link to Evaluation and Feedback Form

Introduction

- Who am I?
- Who are you?
- What I will NOT cover today
- What I will cover today

Who am I?

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Archivist at OSU since 1990.

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Who are YOU?

Outside Scope of this Presentation

- FERPA – session at 2 pm on Tuesday
- Filing systems – for paper or electronic records
- Public records – what are they?
- Public records requests
- Confidential information – what is and what isn't

If any these topics are of interest to you, put it on the feedback form:

<http://scarc.library.oregonstate.edu/records-management.html>

What WILL be Covered Today

- Background and Definitions
- History Lesson – How Did we Get Here?
- What's New and Different
- Policy Details
- General Schedule Details
- How to Apply a Retention Period
- Future Activities
- Other Services
- Wrap-Up and Questions

Background and Definitions

<http://scarc.library.oregonstate.edu/records-management.html>

What are Records?

- Have 3 fixed characteristics:
 - Content
 - Structure
 - Context
- Do they document a transaction?
- Can they be used as evidence or proof?
- Materials that we create or maintain in order to do our job

What is Records Retention?

Certain records need to be retained (i.e. kept) because:

- Legal requirements
- Professional practice
- They are still active and being used

What is a Retention Period?

Period of time that records will be retained.

- Usually expressed in years.
 - Sometimes in months.
- Can be very short (24 hours).

Records Retention Schedule

A document that identifies and describes an organization's records and provides instructions for their retention
(and perhaps their disposition).

Retention and E-Records Systems

Retention periods for records should be determined based on federal or state law or statute, other legal or policy requirements, and/or professional practice.

And THEN:

Electronic Records Systems reflect and implement those retention periods.

History Lesson: How Did We Get Here?

<http://scarc.library.oregonstate.edu/records-management.html>

Timeline

- July 2014: OSU became a legal entity separate from OUS (Oregon University System) and the Oregon State Board of Higher Education (OSBHE).
- Summer 2014: It was determined that OSU had the authority to establish our own records retention policy and schedule. Office of General Counsel (OGC) and University Archivist began developing a draft.
- November 2014: Draft distributed to key stakeholders.
- Dec 2014 – April 2015: Meetings with dozens of units and individuals to discuss the drafts and get feedback.
- Spring 2015: University Archivist worked with OGC and University Compliance Officer to finalize a proposed policy and schedule.
- Policy approved by Executive Policy and Standards Committee effective July 1, 2015.

What's New and Different?

Old Schedule -- THEN

- For all OUS institutions.
- 424 categories of records
- Min/max retention
- Mandated destruction
- “Permanent” retention for some records

New Schedule - NOW

- Only for OSU.
- 40 categories of records
- Minimum retention
- No destruction required
- No “permanent” retention period.

Other Ways the New Policy is Better

- Policy is simple and direct.
- Does NOT include all records generated or assembled by OSU units.
- Allows for the development of unit-specific schedules.
- New policy gives units more authority ... and flexibility ... and responsibility ... in managing their own records.

Two Parts: Policy and General Schedule

[http://scarc.library.oregonstate.edu/records-
management.html](http://scarc.library.oregonstate.edu/records-management.html)

OSU Records Retention Policy

University Policy 04-010

Available online here:

http://leadership.oregonstate.edu/sites/leadership.oregonstate.edu/files/policies/records_retention_2015-07-06.pdf

Purpose:

Establish a uniform practice for retention of records

- created or maintained in the course of university business
- that document the university and its functions, policies and procedures, and decisions

... The Policy ...

- Requires that specified university records be retained for minimum period of time
- Supersedes previous schedules and policies
- Applies to paper and electronic – including e-mail
- Does NOT apply to ephemeral items such as voicemails or text messages

... The Policy ...

- Establishes a General Records Retention Schedule
- Authorizes the creation of “unit specific” retention schedules to address UNIQUE records held by that unit and ONLY the records held by that unit

3 major elements of the policy

1. Minimum retention period set for certain records in the General Schedule.
 - After minimum retention period met, unit can decide whether or not to retain longer.
 - If do not retain, records that include sensitive or protected information should be destroyed in secure manner.

3 major elements of the policy

2. The General Schedule identifies records that may have long-term administrative or historical value.

- University Archivist will work with units to identify those records and develop a plan for preservation and access.

3 major elements of the policy

3. The minimum retention period may be suspended due to
 - Audit
 - Investigation
 - Pending litigation

In these cases, units must obtain approval from the Office of the General Counsel before resuming the retention period.

Policy Outlines Roles and Responsibilities

- OSU units – that's you ...
- University Archivist – that's me ...
- Office of the General Counsel

OSU Units' Responsibilities

- Know what records you create or manage and are required to maintain for a minimum period based on the General Schedule
- Responsible for retention, storage, access of records in compliance with the General Schedule
- Work with the University Archivist to develop a unit-specific schedule for your unit, if appropriate.
- Make requests for changes to the General Schedule to the University Archivist.

University Archivist's Responsibilities

- Develop the General Schedule.
- Educate OSU personnel in records management policy and procedures.
- Assist OSU units in developing unit-specific retention schedules where appropriate.
- Consult with the Office of the General Counsel before approving changes to the General Schedule.
- Assist OSU units in identifying records with long-term value and developing plans for preservation and access.

Office of the General Counsel's Responsibilities

- Coordinates discovery and public records requests.
- Suspends retention schedule for specific records due to audit, investigation, or litigation.
- Assists the University Archivist in reviewing changes to the General Schedule.

General Records Retention Schedule

Available online here:

<http://scarc.library.oregonstate.edu/general-schedule.pdf>

Please Note!

- The General Schedule does NOT include all records generated or maintained by OSU units.
- Records that may have long-term administrative or historical value are flagged as such.

4 Sections of the General Schedule

1. Academic Programs and Student Records
2. Finance and Administration
3. Governance and Leadership
4. Research

Elements for Each Category of Records

- Number
- Title
- Minimum retention period
- “Flag” for long-term records that begins, “May include records with long-term administrative or historical value.
- A *brief* description that typically includes *function* if the records. Does NOT spell out all the documents or types of materials that are included in this category.

Example

2.13 Employment Records

Minimum retention: 7 years after end-date of employment

Document an individual's employment by Oregon State University and resulting benefits.

Final Note about General Schedule

The minimum retention periods specified in the General Schedule apply to all records regardless of the unit that holds them, unless specific units are called out in the description.

Three types (with examples to follow):

1. Apply to records held in ANY OSU unit.
2. Apply only to specific OSU units that are called out in the description.
3. Apply to a central administrative unit and OSU unit(s).

Type 1

Apply to the records held in any OSU unit.

For example:

2.14 Liability Waivers

Minimum retention: 2 years after last contact

Documents releasing or relinquishing a known right, claim, or privilege. These include, but are not limited to, acknowledgement of risk waivers.

Type 2

Apply to specific unit(s) called out in the description.

For example:

1.9 Medical Records

Minimum retention: 7 years after last service or contact

Case files that document services provided by Student Health Services or Counseling & Psychological Services.

Type 3

Apply to a central administrative unit
and OSU unit(s).

For example:

2.11 Employee Search Records

Minimum retention: 3 years after search completed

Document the recruitment and selection process for paid academic, classified, or student positions. Includes search committee records that are maintained in the unit conducting the search.

How to Apply a Minimum Retention Period

- Apply to a group of records – such as all the records generated or accumulated in an academic or fiscal year.
- Begin “clock” with the “youngest” records.
- If decide to retain records beyond minimum retention period, be consistent. Apply to all in that category that are within your responsibility.

Sample Calculation #1

Employee Search Records

Minimum Retention: 3 years after search
completed

Search completed on May 2, 2015

Need to be retained until May 2, 2018.

Round up to July 1, 2018.

Sample Calculation #2

Purchase Orders

Minimum retention:

6 years after date of issue

You have file(s) of purchase orders issued in
FY 14 (which ended June 30, 2014).

Retain until when??

What About Records that Aren't in the Schedule?

- Contact University Archivist. I will work with you to:
 - Confirm that they aren't included (or covered by) one of the categories in the General Schedule.
 - Determine if a Unit-Specific Schedule is appropriate.
 - Discuss the possibility of an addition or change to the General Schedule.

What is in the Future?

- A few revisions to the General Schedule – currently seeking input from stakeholders.
- Development of Unit-Specific Schedules
 - What records (regardless of format) does your unit create and/or maintain that are unique to your unit? [Think about functions that are unique to your unit ... within OSU generally.]
- Best Practice Guidelines and FAQs
- Guidelines for E-mail (enterprise-level)
- Digitization Guidelines

Other Services

- Records Centers
- House Calls for Records Review and Analysis
- Transferring Materials with Long-Term Value to Archival Collections in Special Collections and Archives Research Center

Submit your Feedback

Online Survey

You can find a link to it here:

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Questions?

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