



ADMINISTRATIVE POLICY STATEMENT

Policy Title: Retention of University Records

APS Number: 2006

APS Functional Area: **ADMINISTRATIVE/GENERAL**

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| Brief Description: | This policy establishes the principles and processes for the retention and disposal of <i>university records</i> , outlines the roles and responsibilities associated with this process, and provides records retention schedules for the university. |
| Effective: | January 1, 2019 |
| Approved by: | President Bruce D. Benson |
| Responsible University Officer: | Senior Vice President and Chief of Staff |
| Responsible Office: | Office of Policy and Efficiency |
| Policy Contact: | Policy and Efficiency, 303-860-5711 |
| Supersedes: | Retention of University Records, July 11, 2016 |
| Last Reviewed/Updated: | January 1, 2019 |
| Applies to: | All university <i>employees</i> |

Reason for Policy: This APS establishes a universitywide records retention policy and records retention schedules to comply with state law and align with best practices.

I. INTRODUCTION

This policy establishes principles and processes for the retention and disposal of *university records* and outlines the roles and responsibilities associated with this process consistent with C.R.S. § 24-80-101 *et seq.* It includes detailed records retention schedules for system administration and each campus.

The University of Colorado is committed to the retention of its records to meet legal requirements, optimize use of space, minimize cost, preserve the history of the university, and destroy outdated and useless records. This policy identifies certain records that must be retained for specific periods of time and designates official repositories for their maintenance.

II. POLICY STATEMENT

A. *University records* must be managed as outlined herein.

1. All *university records* are the property of the University of Colorado regardless of their physical location, even when they are in the possession of individuals, and, as such, shall not be permanently removed from the university nor destroyed except in accordance with this policy.
2. *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 Security Officer](#) (CIO) or [Campus Information Security Officer](#).
3. Any university business conducted, or *university records* stored, no matter on university or outsourced IT services:

- a. are subject to the provisions of [APS6010 – Data Governance](#), [APS6001-Providing and Using Information Technology](#) and IT resource user responsibilities outlined in [APS6005-IT Security Program](#) (Section I);
- b. may be subject to a litigation discovery request, subpoena, or court order; and
- c. may constitute a public document subject to disclosure under the Colorado Open Records Act.

B. Roles and Responsibilities

1. The senior vice president and chief of staff¹, or his/her designee, shall oversee the establishment of a records management program that is consistent with this policy.
2. The senior vice president and chief of staff shall designate a records management coordinator for system administration, and each campus chancellor shall designate a records management coordinator for his/her campus (collectively, “records management coordinators”). (See Section IV.C for list.)
3. The records management coordinators are responsible for the development, coordination, implementation, and management of records management program at their locations. The records management coordinators shall promulgate campus rules and procedures and provide advice, information, and training, as necessary, regarding records management. Questions regarding a records management program shall be directed to the applicable records management coordinator.
4. The senior vice president and chief of staff, or his/her designee, shall be the chair of the university Records Management Committee, which shall consist of the records management coordinators.
5. The university Records Management Committee shall provide guidance and procedures for implementing this policy, including the development and maintenance of the university’s records retention schedules (See Section IV.C).
6. *Record keepers* are responsible for maintaining *university records*.

C. Retention of *university records*

1. *University records* shall be categorized and grouped according to the functional purpose they serve.
2. Records management coordinators (see roles and responsibilities in Section B), or their designees, shall review all categories of *university records* under their control as necessary and shall work with *data trustees*, *data stewards* or other designated representatives for the relevant business area to assign a retention period in accordance with their campus retention schedule (see Section IV.C), except as set forth herein.
3. If no retention period is established by the retention schedule or by Section II.C.5, 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.
 - a. Any unit-specific schedule shall be maintained in writing.
4. The retention period is satisfied by retaining the record in any format.
5. Once the retention period set forth in the university or unit-specific retention schedule has expired (see Section IV.C), *university records* shall be destroyed in accordance with Section II.D, unless, for example:
 - 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;

¹ The responsible university officer is the position of “Senior Vice President and Chief of Staff” who reports to the President.

- 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.

D. Disposal Procedures

- 1. When the prescribed retention period for a *university record* has passed, the *university record* shall be destroyed. If there is no prescribed retention period, the *university record* shall be destroyed when it has outlived its usefulness as determined by the *record keeper*.
- 2. Any records to be destroyed shall be disposed of in accordance with this section. 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.
 - a. 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 destroyed using an appropriate method to render the content irretrievable and illegible. For details on appropriate techniques for destruction of records, see appendix A of the [NIST Special Publication 800-88: Media Sanitization Guidelines](#).

E. Non-records

- 1. The retention of *non-records* is at the discretion of the *record keeper*.
- 2. *Non-records* that fall outside of the definition of Section II.D.2.a, may be disposed of at the discretion of the *record keeper*. However, those non-records meeting the definition of Section II.D.2.a, shall be destroyed in accordance with the disposal procedures for university records described in Section II.D.

III. DEFINITIONS

Italicized terms used in this Administrative Policy Statement (APS) are defined in the [APS Glossary of Terms](#) or are defined in this APS.

- A. *Record keeper*: means any individual or unit that maintains a *university record* or *non-record*. This includes *data custodians* and *data users*.
- B. *Unit*: Any organizational entity within the university that has budgetary authority. Includes, but is not limited to, colleges, departments, centers, institutes, offices and programs.
- C. *University records*: Any form of recorded information, regardless of physical characteristics, that is created, received, maintained, or legally filed in the course of university business.

University record does **not** include:

- 1. Materials preserved or appropriate for preservation because of the historical value of the materials;
- 2. Library books, pamphlets, newspapers, or museum material made, acquired, or preserved for reference, historical, or exhibition purposes;
- 3. 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
- 4. Non-records (see III.D).

- D. *Non-records*: A record 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 which 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.

IV. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES, AND OTHER RESOURCES

- A. [Frequently Asked Questions](#) (FAQs)
- B. [NIST Special Publication 800-88: Media Sanitization Guidelines](#)
- C. University Retention Schedules:
- [System Administration](#)
 - [CU Boulder](#)
 - [CU Colorado Springs](#)
 - [CU Denver | Anschutz Medical Campus](#)
- D. Records Management Coordinators (By Campus): [Click here](#).
- E. Related Policies:
- [APS 1014-Intellectual Property That is Educational Materials](#)
 - [APS 2008-Electronic Signatures and Transactions](#)
 - [APS 2022-Colorado Open Records Act \(CORA\)](#)
 - [APS 6001-Providing and Using Information Technology](#)
 - [APS 6005-IT Security Program](#)
 - [APS 6010-Data Governance](#)

V. HISTORY

- Adopted: July 1, 2007.
- Revised: December 1, 2007; Non-substantive edits were made on September 3, 2008, May 2, 2010 and September 15, 2011; April 1, 2012; The title of “IT Security Principals” was replaced with the title of “Information Security Officers” effective May 1, 2014; July 11, 2016; July 9, 2018 (Moved the definitions for “university record” and “non-record” to the APS Glossary of Terms); January 1, 2019.
- Last Reviewed: January 1, 2019.

VI. KEY WORDS

Archives, storage, documents