

Retention of University Records

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1. **What is records retention?**

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of the university, through the deliberate identification and retention of necessary documents and the destruction of outdated and obsolete records in a documented and secure process.

2. **What is the authority for records retention?**

As required by state statutes, C.R.S. § [24-80-101](#) *et seq.* and State Archives Records Management Manual - Schedule 8, [APS 2006 - Retention of University Records](#) defines the principles and processes for the retention and disposal of university records and outlines the roles and responsibilities associated with this process.

3. **What is a University Record?**

The APS defines *university record* as “Any form of recorded information, regardless of physical characteristics, that is created, received, maintained, or legally filed in the course of university business.”

4. **What is not a University Record?**

University record does **not** include:

- a. Materials preserved or appropriate for preservation because of the historical value of the materials;
- b. Library books, pamphlets, newspapers, or museum material made, acquired, or preserved for reference, historical, or exhibition purposes;
- c. 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; or

d. *Non-records*: means 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.

5. ***To whom does the administrative policy apply?***

The policy is applicable to all university employees.

6. ***Who has oversight responsibilities for records retention?***

- The senior vice president/chief of staff, or her/his designee, shall oversee the establishment of a records management program that is consistent with APS2006.
- The senior vice president/chief of staff shall designate a records management coordinator for system administration, and each campus chancellor shall designate a records management coordinator for his or her campus (collectively, “[records management coordinators](#)”).
- The records management coordinators are responsible for the development, coordination, implementation, and management of the 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.
- The senior vice president/chief of staff, or her/his designee, shall be the chair of the university Records Management Committee, which shall consist of the [records management coordinators](#).
- 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.

7. ***What is a Records Retention Schedule?***

A retention schedule is a control document that sets the timeline for when unit records are to be reviewed, how long specific records must be held and how they must then be destroyed. It applies to records in all formats, including paper and electronic media. Individual campus records retention schedules can be found at: <https://www.cu.edu/ope/aps/2006> (Section IV.C)

8. ***Who defines the records retention schedule?***

In accordance with controlling law or retention period guidance, the system and campus records management coordinators, in consultation with respective functional units, create the system and campus retention schedules (<https://www.cu.edu/ope/aps/2006> (Section IV.C)) according to their unit’s input and needs. Changes or additions to the basic schedule can be recommended by the departments and individuals who use the records on a daily basis.

9. ***What if I can't find what I am looking for on the retention schedule?***

Contact the respective system or campus records management coordinator for assistance. The coordinator can help you find the proper document title for your records, or can tell you the process for getting records added to or changed on the retention schedule.

10. ***When can records be destroyed?***

Original records can be destroyed once the retention schedule-defined period has passed, as long as there are no legal, administrative, audit or historical holds on the material. Duplicate records should not be kept any longer than originals.

University records are to be properly disposed of when the prescribed retention period for the record has passed. If there is no prescribed retention period, consult your respective records management coordinator for further guidance.

11. ***What is the appropriate means for records destruction?***

The means of disposal is determined by respective system and campus-defined procedures and the nature of the record. Records may be shredded using approved university/campus-approved department or commercial shredding company services. For details on appropriate techniques for destruction of records, see appendix A of the [NIST Special Publication 800-88: Media Sanitization Guidelines](#). Document destruction service may be purchased in accordance with Procurement Service Center procedures. See [How to Buy Document Destruction Services](#).

Units maintain the disposition and destruction of records in accordance with the records retention schedule and internally-defined processes.

12. ***What about the disposal of electronic records?***

Electronic records fall under the same guidelines as paper records. This includes any media available and in use by the department, such as computers, drives, disks, tapes, microfilm, microfiche, etc., and emails. Computer hard drives shall be purged and/or destroyed before computers are discarded or redeployed in accordance with system or campus policies and procedures.

13. ***How/where do I send records for archival storage?***

You can arrange for pickup of records to be retained in archival storage by setting up a vendor through the [Procurement Service Center](#). A detailed description of the records sent to archival storage needs to be kept for ease of document retrieval as may be necessary. See [How to Buy Document Storage Services](#).

14. ***If I conduct university business from my personal computer/PDA and/or my private email account, are those records subject to this policy and the Colorado Open Records Act?***

Yes, any record relating to university business is a *university record* and is subject to [APS 2006 - Retention of University Records](#) and may be subject to the Colorado Open Records Act (CORA), even if stored in a non-university medium. The university does not promote or encourage the storage of university records on private machines and/or networks.

15. ***May my department decide to increase or decrease the length of time records are retained?***

University records may never be destroyed sooner than the destruction dates listed in the records retention matrix. However, departments/units may choose to keep records longer if there is a business need.

16. ***Should each department/unit designate an individual who is responsible for records retention management?***

Yes, it is important to have an individual designated for records retention management. This will help ensure the systematic destruction of university records in accordance with policy.

17. ***My department routinely keeps copies of records that are maintained elsewhere as the official record. Does the department have to follow the records retention schedule?***

Copies of departmental records that are not considered original source documents may be deleted at any time when the document no longer serves a business purpose.

18. ***How do I contact University Records Management Coordinators?***

Contact information for university records management coordinators is available at <https://www.cu.edu/ope/aps/2006/rrc>.