BFB-RMP-2: Records Retention and Disposition

Responsible Officer:	Chief Information Officer & VP - Information Technology Services
Responsible Office:	IT - Information Technology Services
Issuance Date:	11/13/2015
Effective Date:	11/13/2015
Last Review Date:	
Scope:	This policy applies to all University employees. It applies to all campuses, the Office of the President, Agriculture and Natural Resources, Medical Centers, and the Lawrence Berkeley National Laboratory.

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I.   POLICY SUMMARY

Management of the disposition of administrative records is a component of the University's Records Management Program, as described in Business and Finance Bulletin RMP-1. The purpose of this bulletin is to establish, in the context of the records lifecycle, the universitywide principles and processes for records disposition, and to outline the roles and responsibilities associated with this component of the Program.

This bulletin is for use by anyone in the university community who makes decisions about administrative records. Material provided in the Appendices may be helpful to anyone in the institution who creates or receives records of any type.

Except as superseded by State or federal laws and regulations, and university contracts or grants, the disposition program applies to all administrative records, regardless of their medium.

The Program does not apply to:
- Administrative records held by the Principal Officers of The Regents,
- Teaching and research records (e.g., library materials, faculty research and teaching materials, student examinations), or
- Records pertaining to individual patient care (medical records)

Note that all records may be subject to external requirements, such as State and federal regulations and university contracts.

II.   DEFINITIONS

Active Record: A record that is necessary for the conduct of current business.

Administrative Record: See **Record**.

Disposition: The systematic treatment of records that are no longer active. Options for disposition are:

1. Transfer to an inactive records storage area or commercial records center,

2. Transfer to the University Archives, or

3. Records destruction.

Inactive Records: Records that are no longer required for day-to-day business and may be obsolete. At the end of their active use, records should be systematically removed from active systems and from prime office spaces.

If the retention period found in the UC Records Retention Schedule has lapsed, the inactive records may be eligible for destruction. If the retention periods have not lapsed or the inactive records are still required for a records hold or other legitimate business requirement, then they should be managed in secure environments for appropriate lengths of time based on the Schedule prior to their destruction. Should the inactive records have permanent retention periods, they may be eligible to be formally transferred to the University Archives.

Long-term Retention: A retention period of more than five years (including permanent retention).

Non-record: Material that is of immediate value only. Non-records do not serve to document the organization, functions, policies, decisions, procedures, operations, or other activities of the university, and have little or no operational value. (See III.B for examples.)

Record: Any writing, regardless of physical form or characteristics, containing information relating to the conduct of the public's business prepared, owned, used, or retained by an operating unit or employee of the university. "Writing" means handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combination thereof, and any record thereby created, regardless of the manner in which the record has been stored.

The term "**administrative record**" is used to describe any record that documents or contains valuable information related to the organization, functions, policies, decisions, procedures, operations, or other business activities of the university.

Records Custodian: The individual with responsibility for maintenance of the records of a university department or unit.

Records Proprietor: The individual with management responsibility for the records associated with a university administrative function.

Records Lifecycle: The three stages through which records are to be managed: (1) creation or receipt; (2) use; and (3) disposition.

Records Management Coordinator: The individual at each campus, the Office of the President, the Division of Agriculture and Natural Resources, and the Lawrence Berkeley National Laboratory responsible for the development, coordination, implementation, and management of the Records Management Program at that location.

Records Retention: The maintenance of records for prescribed time periods. See also: Long-term Retention and Short-term Retention.

Short-term Retention: A retention period of five years or less.

UC Records Retention Schedule: A universitywide document that lists and governs the retention period and the disposition of identified records that are common across the University of California (UC) system.

University Archivist: The individual at each campus, appointed by the University Librarian, who is responsible for the preservation of campus administrative records that deal with the history of the university.

III.   POLICY TEXT

DISPOSITION PROGRAM PRINCIPLES
Through the disposition program, the university strives to retain records long enough to satisfy internal and external requirements, but not so long as to incur unnecessary costs or burdens. The aim is to accomplish these goals by:

- Identifying important administrative records that are common universitywide, and encouraging their consistent management throughout the UC system,
- Helping to distinguish administrative records to be managed under the program from other records and non-records,
- Centralizing decision-making as practicable, while allowing for local decisions and practices to address location-specific situations,
- Providing tools, in the form of guidelines and the *UC Records Retention Schedule* (Schedule), to facilitate adherence to these principles throughout the university community.

A.   *Identification of administrative records of importance*

Administrative records determined to have value in one or more of the following areas should be managed (e.g., assigned retention periods) under either a local or the universitywide disposition program:

1. Business operations

The record is needed to perform current or future activities in support of the administrative functions for which an operational unit is responsible.

2. Evidence and accountability

The record contains evidence of legally enforceable rights or obligations of the university; or is needed to fulfill statutory and regulatory requirements; or pertains to financial transactions and is needed for audit purposes.

3. Preservation of university history

The record has enduring historical value to the university or to the research community because it reflects historical events or documents the history or development of the university and its offices.

B.   Identification of non-records

Non-records are defined as materials that are of immediate value only. Non-records may share some characteristics with administrative records; however, they are distinguished from administrative records in that they have little or no operational value. Some examples of non-records are: data entry- and work-sheets, rough drafts, multiple copies of publications, blank forms, unofficial ("informational" or "courtesy") copies of administrative records, and notes and audio recordings that have been transcribed.

Non-records should be destroyed once they are no longer needed. If non-records are not handled in accordance with their temporary nature, the unnecessary use of university resources may occur. If not disposed of, non-records may be subject to disclosure (e.g., under the California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding).

C.   Coordination with University Archives

In 1964, the university established a University Archives program to preserve within the general library at each campus administrative records associated with the history of the university. Coordination with the archives function is key to the success of the disposition program, and occurs on multiple levels:

- between the University Records Management Committee and the University of California Archivists Council (UCAC);
- between campus Records Management Coordinators and the University Archivist at their respective locations; and
- between holders of historical records requiring preservation and their local University Archives.

D.   Records lifecycle management
At the heart of the records management program is the concept that records pass through three stages – Creation (or receipt), Use, and Disposition – and must be managed through each. A graphical representation of the lifecycle is presented below.

Judgments about the eventual disposition of records are best made at the beginning of the lifecycle. Success of any disposition program depends on an early awareness of which records are to be managed, and the need to manage them through all three lifecycle stages.

1. Creation or receipt
Records are identified as administrative records to be managed at Stage 1, when they are created or received.
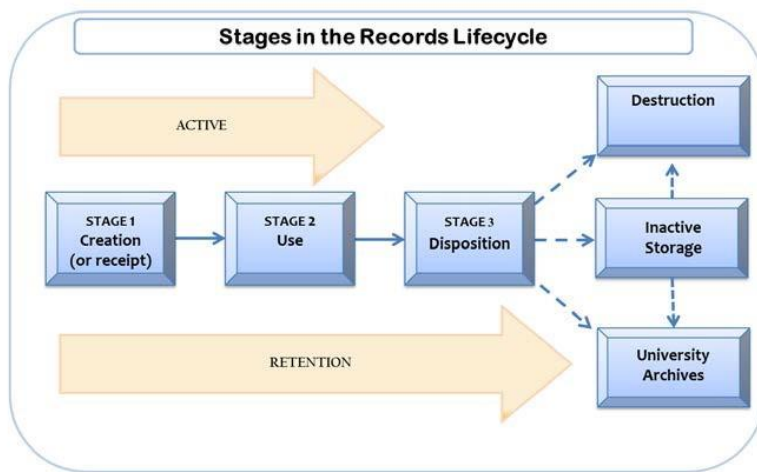
2. Use
Stage 2 lasts as long as the record is in use and concludes when the record is no longer active.

3. Disposition
Stage 3, Disposition occurs when the record is no longer active. There are three options for disposition: (1) records may be placed in inactive storage if they are still within their retention period, but the frequency of their use has diminished; (2) records may be destroyed when the retention period has lapsed; or (3) with prior arrangement (or as mandated in the schedules), records may be transferred to University Archives.
Decisions regarding the method of disposal are local decisions made by Records Proprietors (sometimes in conjunction with Records Custodians) taking into account any legal considerations.

Records can be placed in inactive storage if the retention period has not expired. Once the retention period has expired, the records should be destroyed.

As a general guideline, a record that is accessed at least once a year or more frequently can be considered "active," while one accessed less frequently can be considered "inactive." Local practices and/or space considerations may override this guideline. Decisions on storage methods and location are local decisions made by Records

Proprietors (sometimes in conjunction with Records Custodians).

Decisions concerning the transfer of records to University Archives also are made locally. In addition, certain records that are common universitywide have been identified by the University Archivists as core records with historical value to each campus. For these records, archival instructions are published in the UC Records Retention Schedule and must be followed. These are the only disposition instructions included in the universitywide Schedule.

IV.   COMPLIANCE / RESPONSIBILITIES

ROLES AND RESPONSIBILITIES

A.   *General*
All employees who handle administrative records are responsible for applying the guidelines contained in this Bulletin.

B.   *Universitywide*

1. University Records Management Committee
The University Records Management Committee is responsible for the development and ongoing maintenance of the Schedule.

Through their Committee membership, ex-officio members of the University Records Management Committee are responsible for review of new entries to the Schedule from the points of view of their particular areas of expertise: Office of the General Counsel, for legal criteria; University of California Archivists Council for historical criteria; University Auditor for audit implications; and Executive Vice President/Chief Financial Officer for fiscal accountability.

2. Chair, University Records Management Committee
The Chair of the Records Management Committee publishes and maintains the University of California Records Retention Schedule. The Chair also maintains copies of the Schedule that have been superseded to provide a historical record of the schedules that were in force at a given period in time.

3. Universitywide interest groups
It is the responsibility of the leadership of universitywide groups (e.g., Controllers, Human Resources Managers, Registrars, HIPAA Privacy Officers) to bring to the attention of the University Records Management Committee changes and developments in their particular

functional areas that may have records retention impacts. Recommendations for proposed new or revised retention schedules may be submitted to the Committee, as outlined in

C. *Local*

1. Records Management Coordinator

The local Records Management Coordinator creates, publishes, and maintains local records retention schedules, if any. The Coordinator also maintains copies of these schedules that have been superseded to provide a historical record of local schedules that were in force at a given period in time.

The Coordinator may propose records for inclusion in the Schedule; on these and other proposals, it is the responsibility of the Coordinator to convey the interests of his or her location to the University Records Management Committee. The Coordinator is the local resource for retention questions.

2. University Archivist

The University Archivist at each location is responsible for preserving records that reflect historical events or document university history, which have value to the university or to the research community. This includes the permanent maintenance of records designated in the Schedule as permanent retention, with the instruction to "transfer to University Archives," as detailed in V.C.4.a).

Collectively, through representation on the University Records Management Committee, the University Archivists review proposed new or revised entries to the Schedule and indicate which records should be offered to local University Archives for review or transferred to University Archives.

Locally, the University Archivist collaborates with the Records Management Coordinator on any location-specific archival matters, including participating in review of local schedules, if any. The University Archivist also consults with local Records Proprietors on the preservation of long-term retention records.

3. Records Proprietor

The Records Proprietor interprets and applies universitywide and local retention schedules to records in his or her charge and ensures that these requirements are conveyed to the Records Custodian. The Proprietor documents variations from the standard calculation of the disposition date that are not otherwise noted in either universitywide or local schedules. The Proprietor makes decisions, consistent with these guidelines and university policy, on storage and disposal methods, sometimes in conjunction with the Custodian. The Proprietor collaborates with the Records Management Coordinator and/or University Archivist regarding the application of universitywide and local archival instructions and contacts the Archivist prior to transfer of any records to University Archives.

4. Information Practices Coordinator

The Information Practices Coordinator advises on privacy and access-to-information matters that may arise in connection with the storage and disposal of records.List the individual roles or units responsible for instituting or complying with all or some portion of the policy.

V.   PROCEDURES

A.   *Retention schedules*

The UC Records Retention Schedule governs the retention of records universitywide. The current version of the Schedule is published online and is to be accessible to any university employee with record-keeping responsibilities. The Schedule is to be followed by all university units.

To facilitate consistent treatment across the University of California, administrative records that serve the same business purpose are organized by purpose or function. For example, rather than list all the specific records from every university location that are used to track the financial and procurement activities of the University, all such records that perform that function are grouped together under a heading ("Financial and Procurement Records") that is generally applicable.

1. Contents

Within broad functional categories, records are described by the business purpose they serve. Each descriptive group contains the following elements:

   a. A description of the function or business purpose of the records,
   b. A retention period, stated in years, or as "permanent,"
   c. Retention period details, such as "following completion of project" or "after superseded," as appropriate,
   d. An indicator if the records group requires special treatment accorded to the university's vital records,9 and
   e. Archival instructions, if any.

Records location and university office in charge of the records are no longer tracked on a universitywide basis, although such information may appear in legacy documents under the designation "office of record."

2. Creation of a new Schedule

The local Records Management Coordinator, in consultation with operational managers, may propose additions and revisions to the Schedule to the University Records Management Committee as needed.

The leader of a universitywide interest group may propose revisions or additions related to his or her particular functional area to the Chair of the University Records Management Committee.

Proposals to add to or revise the existing Schedule should include recommendations for each relevant Schedule element (see V.A.1.a-e), and in addition:

      a. Justification for the proposed addition or revision (e.g., why the record needs to be managed: a description of its value to the institution, per III.A.1-3), and

      b. A description of the coordination that has taken place (who has approved, endorsed, and/or been consulted about the proposed retention period).

   3. <u>Local schedules</u>

University locations may develop and publish local schedules that supplement the universitywide Schedule. Local schedules may connect specific information such as local records names, filing locations, and other location-specific practices, to the universitywide records groups.

When local operational considerations so require, local schedules may specify a retention period that is longer, but not less than, the universitywide Schedule.

B.   *Records not in the Schedule*

Records exist throughout the university that are outside the scope of this policy. The local Records Management Coordinator is the primary contact for advice on whether a given record is omitted from the Schedule due to scope or some other reason (e.g., differing interpretation, or new records for which no appropriate model exists).

If the Records Management Coordinator determines that a record should be proposed for addition to the universitywide Schedule or local schedules, during the time such proposal is pending the retention period of the record should be assumed to be the longer of the proposed retention period, or four years.

C.   *Destruction procedures*

   1. <u>Determining the destruction date</u>

Retention periods are counted from the date of creation of the record, unless other instructions (e.g., "3 years from termination," "1 month after last modified") are noted.10 Destruction would normally occur following the end of the month or year that marks the end of the retention period: thus, destruction of a record for which the retention period ends on May 15 would take place as soon after May 31 as practicable.

The manner in which records are organized – in a set, for example – may prevent the carrying out of destruction for some records until the end of the retention period is reached for all records in the set. Operational practices also may influence the carrying out of destruction: for instance, when the records' function is tied closely to the university fiscal year (July 1 – June 30), destruction may be accomplished at the end of the fiscal, rather than the calendar year. Practices that require variation from the presumptive destruction date, and which are not noted in the universitywide or local schedules, should be documented by the responsible Records Proprietor.

   2. <u>Timely destruction</u>

Failure to carry out timely destruction can lead to the unnecessary expenditure of resources to store, maintain, search for, and produce records. In addition, when records may legitimately be destroyed at the end of their retention period, but destruction is not carried out, such records remain subject to possible future requests under statute or legal proceedings (e.g., California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding).

3. Cautions regarding destruction
   a. Records destruction must take into account the nature of the records' contents. When called for – for example, in the case of confidential documents – records contents are to be rendered irretrievable by shredding or other means. Destruction techniques and considerations are discussed in Appendix B: Recommendations for Records Destruction.

   b. Even if records have reached or exceeded the end of their retention period, there may be conditions under which their destruction must be deferred.

      i. External requirements under State and federal laws or regulations and university contracts or grants override university retention periods, where applicable.

      ii. Records that have been requested pursuant to statute or legal proceedings (e.g., California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding) must not be destroyed while the matter is ongoing.

      iii. Records that have not yet been requested, but are deemed likely to be requested pursuant to statute or legal proceedings, including foreseeable litigation, must not be destroyed without prior consultation with the Office of the General Counsel.

      iv. Records related to any ongoing investigation must not be destroyed without prior consultation with the Office of the General Counsel.

      v. Records related to a pending or ongoing audit.

   c. The intentional destruction of records to avoid their disclosure may be punishable by disciplinary action and/or civil or criminal penalties.

4. University Archives
   a. Archival instructions

      The Schedule contains archival instructions for some records groups. In all cases where an archival instruction appears, Records Proprietors and others in possession of such records must contact the University Archivist prior to transferring any records.

Depending upon the wording of the instruction, acceptance of the records at disposition time by the University Archivist is either optional or required. The three types of archival instructions are:

i.   Subject to University Archives review

Records designated in the Schedule as "subject to University Archives review" must be offered to the University Archivist as instructed. It is the University Archivist's option to accept and retain such records, to accept and retain a portion of the records, or not to accept the records.

ii.   Transfer to University Archives at the end of retention

Records with a specified retention period other than "permanent" are to be transferred to University Archives at the end of the stated period. The University Archivist is required to accept the records.

iii. Transfer of "permanent" retention records to University Archives after a specified period

A portion of the records with a retention period of "permanent" are indicated for transfer to University Archives. Usually, the time at which records are to be transferred is indicated in the instruction (e.g., "transfer to Archives after 10 years"). The University Archivist is required to accept such records. According to archival practice, permanent administrative records will be preserved at University Archives in their original order, if the order is evidence of administrative practice.

b. Access to records transferred to University Archives

Limitations on access to the records by archives users, consistent with State and federal law, may be negotiated between the Records Proprietor and the University Archivist. Records transferred to University Archives remain the property of the university and are administrative records, not general library materials. Records become part of the archives' holdings upon their transfer.

c. Permanent retention records with no archival instruction

Records Proprietors may contact University Archivists for advice on the continuing maintenance of permanent retention records that are not pre-designated for transfer to University Archives. The topics of maintenance and preservation are discussed in Appendices A and C, respectively.

d. Archival interest in records not in the Schedule

University Archivists may also be contacted for appraisal of the archival value of records omitted from the Schedule due to scope or for other reasons.

VI.   RELATED INFORMATION

- Business and Finance Bulletin RMP-1, "University Records Management Program"
- Business and Finance Bulletin RMP-4, "Vital Records Protection"
- Business and Finance Bulletin RMP-7, "Privacy of and Access to Information Responsibilities"
- UC Records Retention Schedule

VII.   FREQUENTLY ASKED QUESTIONS

Not applicable

VIII. REVISION HISTORY

- Revised September 2015, as RMP-2 "Records Retention and Disposition: Principles, Processes, and Guidelines," to correct name and title changes to align the policy with the updated UC Records Retention Schedule.

- Revised September 22, 2004, as RMP-2, "Records Retention and Disposition: Principles, Processes, and Guidelines."

- Revised July 1, 1987, as RMP-2, "Records Disposition Program and Procedures," to note the option of a subcommittee chair to choose whether or not to use RM-2 forms in the procedures for establishing disposition schedules.

- Revised September 15, 1986.

- Revised November 1, 1985, as RMP-2, "Records Disposition Program and Procedures."

- Originally published June 15, 1976, as RM-2, "Records Disposition Program and Procedures."

APPENDIX A: RECOMMENDATIONS FOR RECORDS MAINTENANCE AND STORAGE

"Maintenance and Storage" refers to the activities surrounding the organization, retrieval, and transfer of records.

The following tips are for anyone in the university who makes decisions about how to organize or store records. If you use a computer, or fill out forms, or send or receive mail, you probably are creating or receiving records.

Not all tips will be applicable to every situation. These lists of recommendations were developed by information professionals in order to encourage the broader consideration of records maintenance and storage principles, and to point readers to additional resources for help with their particular circumstances.

General

- Organize and store university records in a way that you, *or someone else, if necessary,* can access them most efficiently.

- Match the effort and cost to maintain and store a record with the record's value to the unit and the university.

- For records that need to be retained for some period of time, keep in mind the records lifecycle (III.D). When such records are created or received, try to plan for their eventual disposition.

- In the case of electronic records, in addition to the ongoing maintenance of the records themselves, the Records Custodian must make sure that the system remains viable or a migration plan is executed to ensure that the records will remain accessible throughout their retention period.

- Consider appropriate alternatives to maintenance and storage: is the record reliably available from another office? Is the record available online – and guaranteed to continue to be available online for as long as you will need to refer to it?

- If the records contain personally identifiable or other sensitive information, maintenance and storage methods must include measures to protect against unauthorized access. These topics are discussed in IS-3, "Electronic Information Security."

- Vital records represent a small percentage of the university's records, but their loss or premature destruction can be disproportionately costly to the institution. Exceptional maintenance and storage measures might be required for vital records. Please reference RMP-4, "Vital Records Protection" for information about vital records identification and responsibilities.

- Remember: keeping records longer than necessary or required is a waste of time, space, and other university resources.

Organization

- Add descriptive labels to records or groups of records. Use the most obvious, standard filing schemes so that anyone could retrieve the records if necessary. Examples of simple schemes that can be applied - alone or in combination - to both paper and electronic files, include:

    o Alphabetical -by personal name; by business name,
    o By date – group by day, month, or year; in order by date received; by disposition date,
    o By subject or topic.

- If records are grouped by the destruction date, an entire file/disk/carton can be processed without additional searching for those records that have reached the end of retention. If no further review of the records is needed before they are destroyed, this can be indicated somewhere on the records or inventory to avoid review later on.

- Keywords, summaries, and other descriptive data about records ("metadata") can be particularly useful if specific individual records will need to be retrieved from a larger repository, or if there is a need to distinguish some records from many similar ones. Most software can provide a way to add such metadata or "properties" to word processing files, spreadsheets, and other types of documents.

- Separate records requiring confidential destruction (see Appendix B) from those for which routine destruction will suffice.

- Mark records as "copies" if they are not the authoritative versions, to avoid possible confusion and facilitate records destruction at a later date.

- Mark "drafts" as such so that they can easily be destroyed in favor of final versions.

- ARMA International, Inc. (the authority on Information Governance) is a source for more information about organizing files and records.

Retrieval

- Maintain records with an eye to how they will need to be retrieved: will it be important to reproduce the original look and feel – physical appearance, formatting characteristics? Is the context or organization of the records important or just the content?

- Consider whether records will be part of a larger repository, and thus more difficult to

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individually locate and retrieve; such records may require keywords (described in
Organization, above) or a more granular filing scheme (e.g., by *year* and *month*,
rather than just by *year*).

- Keep in mind how quickly the records will need to be retrieved. Will there be time to
review hundreds or thousands of potential matches? Or will it be necessary to zero in
on the precise record in a very short timeframe? Such considerations will influence
the choice of access method.

- For unstructured electronic records (aggregations of records without common
qualities), full-text searching can be applied. Note, however, that this approach tends
to increase costs to store and maintain the records, and that searches can result in
the retrieval of many irrelevant records that are time-consuming to review.

Storage

- Storage methods should be aligned with your business requirements: how quickly do
you need to be able to get to the record? How often is it likely to be accessed over
the period during which it will be stored? Will it need to be accessed by multiple
people who may be geographically dispersed?

- Take into account your business requirements when deciding where to physically
locate the records, whether on- or off-site; on-, near-, or off-line; or at a remote
location.

- Use labels and/or inventories to track contents of storage containers (files, folders,
disks, directories and sub-directories, cartons, drawers, etc.). Devise tracking
schemes that will be obvious to others, in case someone other than you needs to
retrieve records.

- Protective measures should be commensurate with the consequences of possible
loss of the records. For example, vital records typically require greater protection
than non-vital records.

- Sensitivity of the records' contents may demand exceptional measures to ensure
against tampering or unauthorized access. (See Appendix B for more information on
records sensitivity.)

- Records that have *evidentiary value* (see RMP-2 III.A.2) may require measures that
sustain the records' integrity or authenticity. Examples of such measures include
logging all access to the records, and the storage of electronic records in a "read-
only" state to avoid inadvertent or deliberate changes to the record. (See IS-3 for
more on Information Security.)

- Maintain records in a format, medium, and, if electronic, in a file format that has a
high probability of enduring as long as records need to be kept. Technology change
is especially an issue for long-term retention (anything over five years, including

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permanent retention). (See also Appendix C on preservation for more on this topic.)

Storage with outside parties

- Justifications for storage with outside vendors can include: lack of on-site space; need for redundancy (e.g., a second set of records stored at a separate location as part of a disaster recovery plan); ability of a vendor to deliver additional services or better service than can be provided in-house.

- If storage is contracted to non-University facilities, standards of the facility/organization should meet or exceed the University's own capabilities with regard to security, environmental protections, employee training, etc. Any such requirements should be stipulated in the contract.

- Information about which factors to assess when selecting off-site storage can be obtained from PRISM, the non-profit trade association of storage vendors. *Conservation Online* (CoOL) also provides a link to an article[12] with advice on this topic.

Transfer

Records may be transferred in order to ensure their integrity across changes in technology that occur or are expected to occur. In some circumstances, migration, conversion, or both may be appropriate.

- *Migration* refers to the transfer of materials or systems of records to succeeding versions of software/systems; or, more broadly, the transfer from one technology generation to subsequent generations (e.g., from client-server architecture to "thin client" or Web technology).

- *Conversion* refers to the transfer of material to a different format or medium. Examples include:

  o Scanning of paper to microfilm or paper/microfilm to digital images
  o Re-keying of printed text to machine-readable format
  o Transferring of records from proprietary formats/systems to more independent, open ones
  o Converting read-write format to read-only

Increased ability to access the records is another potential benefit of records transfer. For example, records or systems of records previously maintained in stand-alone fashion can be made network-accessible through conversion. Such projects should be undertaken in collaboration with experts from records and information technology and other stakeholders.

Transfer also refers to the physical transfer of historically valuable records (and the associated authority for such records) to University Archives. This is the University's formal

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[12] Moore, Pat. "Vital Records Protection Issues." *Abbey Newsletter.* July 1997 (v.21:8)

process for ensuring the records' ongoing, long-term availability, discussed in depth in V.C.4.

No records should be transferred to University Archives without first contacting the University Archivist.

Where to get more advice on your specific situation:

- [Records Management Coordinators](#) – contact information for campus, Office of the President, Division of Agriculture and Natural Resources, and Lawrence Berkeley National Laboratory coordinators

- [University Archivists](#) – contact information for campus archivists

- **Systems/technical staff** – technical support staff should be able to advise you – or point you to help – about maintenance and storage of records used by you/your workgroup. For information about a specific system (e.g., the payroll system, your online calendar), ask to be put in touch with the person who functions as Records Proprietor for that system.

- **Campus Controllers** and **Risk Managers** – at some locations, and depending upon the type of records, these individuals may be involved in planning for records maintenance, backups, and disaster recovery. Please check your local directory for contact information.

- **External Organizations:**
  - [Association for Information and Image Management – AIIM](#)
  - [ARMA International](#)
  - [Professional Records & Information Services Management – PRISM International](#)

APPENDIX B: RECOMMENDATIONS FOR RECORDS DESTRUCTION

The following tips are for anyone in the university who has occasion to destroy records. When one uses a computer, fills out forms, or sends or receives mail, records are probably created. Eventually those records will need to be destroyed.

General advice

Destruction is made easier if it has been considered at the beginning of the records lifecycle (see III.D). Techniques that can help to expedite destruction include:
1. pre-identification of records that can be destroyed without additional review;
2. grouping together of records that can be destroyed on the same date; and
3. prompt destruction of any non-record materials as soon as they have served their purpose, so as to reduce clutter and streamline the eventual destruction of retained records.

See Appendix A for more information about the organization and storage of records.

Records requiring confidential destruction (rather than simple destruction)

Methods of confidential destruction need to take into account the subject matter or *contents* of the records. Records containing information that, if accessed or used inappropriately, could adversely affect the university, its partners, or the public, must not be destroyed casually. Instead, such records *must be destroyed* in such a manner that they cannot practicably be read or reconstructed. In some cases, records requiring confidential destruction may be intermingled with other records to such an extent that it is more cost-effective to confidentially destroy an entire group of records, rather than picking out just those for which confidential destruction is required.

Many categories of records whose contents require confidential destruction, rather than simple destruction, have been defined in various university policies, using varying terminology, as exemplified in the following list.

- **Academic review records** as described in APM-160-20-b (1) and (2) http://www.ucop.edu/acadadv/acadpers/apm/apm-160.pdf

- **Protected health information** as described in http://www.ucop.edu/ethics-compliance-audit-services/compliance/hipaa/

- **Student personally identifiable information** as defined in the UC Policies Applying to Campus Activities, Organizations, and Students, Section 130.240 http://policy.ucop.edu/doc/2710533/PACAOS-130

The preceding list is meant to be illustrative, not complete. For assistance determining the disposal requirements of specific records, contact the Information Practices Coordinator at your location.

Confidential Destruction methods

- Records stored on paper: *shred*
  - o Many locations throughout the university have contracts with shredding services. To find out how shredding is handled at a location, ask the department/unit business officer.

- Records stored on microfilm: *destroy the microfilm or –fiche by cutting up, shredding, or otherwise ensuring it cannot be read or reconstructed*

- Records stored digitally: *don't just "erase" or "delete"*
  - o In general, electronic files and records are not entirely deleted unless they are written over; there are specialized software tools for this task.
  - o Special measures must be taken when computers are discarded to ensure that the information on hard drives is not recoverable. Recognize that machines may be redeployed or even resold outside the university after they leave your work unit.
  - o A process called "degaussing" can be used to erase magnetic media that are not going to be reused or resold.
  - o Some shredders can destroy diskettes and CDs as well as paper.

Services and procedures vary depending on university location. For more information about the thorough confidential destruction of electronic records in a work unit, start by contacting whoever is responsible for the computer desktop support.

Confidential Destruction by outside parties

When contracting with an outside entity for confidential records destruction, the contract should specify confidential destruction measures that are consistent with these guidelines and should provide for some form of monitoring the entity for compliance with agreed-upon practices and procedures.

Standard records destruction methods

- Where no records requiring confidential destruction are potentially involved, standard records destruction methods are sufficient.
  - o However, university computer hard drives should be assumed to contain some records that would require confidential destruction rather than standard records destruction; information on disks that are to be discarded must be rendered unrecoverable per *Confidential Destruction Methods*: Records stored digitally (above).

- Recycling of paper records – including the remnants of shredding – is encouraged.

- Special waste handling may be required for media other than paper.

- University locations have different recycling and records destruction practices. The department/unit business officer should be able to point to services available at the location.

More information:

- Business and Finance Bulletin BUS-38, "Disposal of Excess Property and Transfer of University-Owned Property"

- Information Practices Coordinators (for assistance identifying records' contents requiring confidential destruction)

- Records Management Coordinators

APPENDIX C: RECORDS PRESERVATION CONSIDERATIONS

> Preservation encompasses the activities which prolong the usable life of...records. Preservation activities are designed to minimize the physical and chemical deterioration of records and to prevent the loss of informational content.
>
> "What is Preservation?"
>
> U.S. National Archives and Records Administration (NARA)

This Appendix is an overview of records preservation: potential problems, recommended preservation actions, campus contacts, and preservation resources.

Preservation is primarily an issue for two types of records determined to be valuable to the university: vital[13] records, and records with long-term[14] retention periods. In the case of the latter, preservation procedures help protect the records from needless deterioration. Preservation actions can also apply to the technology associated with a record, to ensure continued availability of the record and/or of its contents.

NOTE: Technical specifications for different file types, file media, machine-readable files, etc., are specialized topics and are beyond the scope of these preservation guidelines.

General advice

Best practices recommend that preservation measures be anticipated and applied early in the records' lifecycle - ideally, when records are created or received. However, in current practice, preservation measures tend to be applied when records become inactive, at which point appropriate preservation measures are more costly and complex to implement.

As with maintenance and storage measures (Appendix A), preservation techniques should be commensurate with the records' value to the university. The costs of records loss should be balanced against the ongoing costs of preventing the loss (preservation).

Preservation considerations

The following general issues are worth consideration for their relevance to your particular vital or long-term records situation. Suggested preservation actions should be considered in the context of business and other requirements. Specific advice on these topics can be obtained by contacting the Resources at the end of this Appendix.

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[13] Vital records are discussed in depth in RMP-4, "Vital Records Protection." Less than one percent of the university's administrative records are classified as vital.

[14] 23% of assigned administrative retention periods are for long-term retention (i.e., more than five years, including permanent retention records)

Preservation Objective	Preservation Action(s) to Consider
Ensure records availability by preventing or delaying deterioration due to *environmental conditions* (e.g., heating-ventilation-air conditioning [HVAC] systems; molds; pests; dust; light; air pollutants).	Identify and eliminate environmental hazards that are potentially destructive to records.
	Routinely inspect records storage conditions.
	Utilize (or transfer records to) storage containers that withstand or slow destruction by environmental conditions.
Ensure *records' medium* (e.g., paper, photographs, tape, disk, microfilm) is stable, preventing deterioration.	Transfer records' information from unstable or deteriorating media to stable media.
	Routinely monitor records for signs of deterioration.
Ensure ongoing records availability (or shorten time of unavailability) despite *natural disasters* or other *unforeseen events* (e.g., flooding, fire, chemical exposures, earthquakes).	Mitigate damage to records.
	For high-risk records or records whose loss would be most costly, store backups at separate location.
	Institute a disaster recovery plan. Identify essential records' department functions and prioritize recovery of those records.
Recover original records' content if records are destroyed.	If original records are destroyed, recover records' content and functionality by means of reproductions.
Prevent loss of authentic records or records' content as a result of theft, tampering, etc.	Establish or tighten existing security measures (e.g., password protection and logging for electronic records, physical locks and other controls for tangible collections).
	Utilize read-only formats to guard against unintentional or intentional changes to records' contents.
Ensure continued access to vital and long-term electronic records.	At time of records' creation, select open, non-proprietary file formats and medium if possible; later, consider migration to newer or more viable operating system/application software.
	Retain obsolete (or to-be obsolete) hardware along with records.
	Utilize software to emulate obsolete operating system/application software.

Special considerations – electronic records

If original organization, context, and look-and-feel of a record are not essential, consider reformatting the record to another medium. Migration to different software may also be appropriate.

Backups of electronic records made for emergency restoration of entire systems generally should not be considered "preservation" measures, as they may not be suited to locating and replicating individual records. Contextual characteristics or the organization of the records may be lost if records are restored from such sources.

Keep in mind that paper, though limited in its distribution and prone to deterioration, is frequently the most open, technology-neutral medium, followed by microfilm.

Where to go for help - Campus Resources

Preservation Officer

- Contact your campus library or find the contact at your location: http://libraries.universityofcalifornia.edu/pag/pag-roster

Records Coordinator

- See the list of contacts for each of the ten campuses, the Office of the President, the Division of Agriculture and Natural Resources, and the Lawrence Berkeley National Laboratory Records Management Coordinators

Systems/technical Staff

- Contact technical support staff attached to your department or unit with questions about preservation of electronic records used or created there. Other resources may be available from campus Information Technology organizations.

University Archivist

- Contact your campus library or see the list at: http://libraries.universityofcalifornia.edu/ucac/roster

Where to go for help – Urgent Requests/Disaster Assistance related to records preservation

- California Preservation Program emergency line: 888-905-7737 (within California)

Where to go for help - Web Resources

General Preservation Information

- U.S. National Archives and Records Administration (NARA) – Preservation http://www.archives.gov/preservation/

- University of California Libraries Preservation Advisory Group (PAG) http://libraries.universityofcalifornia.edu/cdc/pag/

Disaster Planning and Response

- Conservation Online (CoOL), a project of the Preservation Department of the Stanford University Libraries – Disaster Preparedness and Response http://cool.conservation-us.org/bytopic/disasters/

- LYRASIS (a not-for-profit library cooperative) - Preservation and Access Program http://www.lyrasis.org/LYRASIS%20Digital/Pages/Preservation%20Services/Disa ster-Resources.aspx

Off-site Storage

- Refer to RMP-2 Appendix A – Recommendations for Records Maintenance and Storage

Vital Records

- Moore, Pat. "Vital Records Protection Issues." *Abbey Newsletter.* July 1997 (v.21:8).

- UC Business and Finance Bulletin RMP-4, "Vital Records Protection"