



## POLICY

**ISSUED:** April, 1967  
**REVISED:** April, 2010  
**APPLIES TO:** All faculty, staff, student employees, vendors, and volunteers

The Ohio State University (Ohio State) recognizes the need to effectively manage its dynamic, complex decentralized organization, while at the same time preserving its history. Therefore, Ohio State seeks to manage the retention and disposition of its records in order to:

1. document our management decisions
2. provides historical references of transactions and events
3. demonstrate regulatory compliance, especially with Ohio Revised Code and federal laws
4. enhance our organization’s operational efficiencies
5. provide litigation support
6. preserve the university’s institutional memory

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## I. POLICY DETAILS

### A. AUTHORITY:

The University Archives is responsible for developing and maintaining the *General Records Retention Schedule* for the management and disposition of university records common to many offices, as well as developing schedules for campus units with unique records. The University Archives provides for the selection, preservation and research use of records that have enduring historical value that:

1. document the origin, development, and operation of university units;
2. relate the roles of the faculty and staff and/or student organizations to the operational activities of Ohio State or campus life.



# RECORDS MANAGEMENT UNIVERSITY ARCHIVES

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This authority, originally established by Board of Trustees actions in 1965<sup>1</sup> and 1966<sup>2</sup>, and set forth in Section 9 of the Ohio State Operating Manual, was reaffirmed by the Board of Trustees' Resolution No. 2009-11<sup>3</sup> in July 2008.

Further, the Ohio Revised Code 149.33(B) empowers state-supported institutions of higher education to run their own records management programs stating, "The boards of trustees of state-supported institutions of higher education shall have full responsibility for establishing and administering a records program for their respective institutions. The boards shall apply efficient and economical management methods to the creation, utilization, maintenance, retention, preservation, and disposition of the records of their respective institutions."<sup>4</sup>

To "...apply efficient and economical management methods..." the Inter-University Council of Ohio (IUC)—the fourteen public universities in Ohio—have chosen to develop a model records retention schedule<sup>5</sup> for member institutions to utilize as a basis for creating local general and unique schedules. Further, The Ohio State Board of Trustees charged the Universities Archives to "...assist with updating and revising the Inter-University Manual on Records Retention in coordination with and on behalf of Ohio's public universities..."<sup>6</sup> This process establishes an expectation for and consistency in the management of records for these public institutions of higher education.

## **B. WHY DO WE KEEP RECORDS?**

Records must be maintained and managed if there is a legal requirement to do so. Further, there may be fiscal reasons for retaining records—typically managing them until an audit is completed. In absence of legal and fiscal requirements, there may be administrative needs that necessitate the maintenance and management of records. Finally, a portion of the records will be accessioned and maintained by the University Archives, at the end of their useful administrative life, due to their historical significance.

## **C. WHAT IS A RECORD?**

The State of Ohio defines a record as "...any document, device, or item, regardless of physical form or characteristic, including an electronic record as defined in section 1306.01 of the Revised Code, created or received by or coming under the jurisdiction of any public office of the state or its political subdivisions, which serves to document the organization, functions, policies, decisions, procedures, operations, or other activities of the office."<sup>7</sup>

University records may include but are not limited to:

1. financial records such as requisitions, purchase orders, invoices, bank data, and ledgers or journals
2. administrative records such as correspondence, reports, policy statements and related items sent and received
3. minutes of all University boards, committees and other groups
4. personnel records of faculty, staff, and students
5. student records
6. publications and other items issued by the University
7. sound recordings, video recordings or photographs of University faculty, staff, groups or events

As a public institution, The Ohio State University's records are public records, and therefore are available for public scrutiny as per the Ohio Revised Code (ORC) 149.43(A)(1).<sup>8</sup> Subsections (a) through (aa) define what documents are not public records and/or what information in a public record is not disclosable.

## D. HOW LONG DO WE KEEP RECORDS?

The amount of time that Ohio State must maintain records depends upon the legal, fiscal, administrative, and/or historical informational value. Records retention conceptually can be grouped into six major categories, described here in shortest to longest retention periods:

1. **NON-RECORD:** Any document, device, or item, regardless of physical form or characteristic, that has been created or received in the course of University business that *FAILS* to serve as documentation of the organization, functions, policies, decisions, procedures, operations, or other activities of offices of the University.

Non-records may include but are not limited to:

- a. catalogs
  - b. external Listserv® materials
  - c. junk mail/spam
  - d. non-University publications
  - e. personal correspondence
2. **TRANSIENT/TRANSITORY RECORDS:** Documents including telephone messages, some emails, drafts and other documents, which serve to convey information of a temporary value, have a very short lived administrative, legal and/or fiscal value and should be disposed in an appropriate manner once that administrative, legal or fiscal use has expired. Typically the retention is not a fixed period of time and is event driven; it may be as short as a few hours and could be as long as several days or weeks.
  3. **SHORT TERM RECORDS:** Records with short term retention are documents (including some email) of significant administrative, legal, and/or fiscal value having a definitive life, typically ten (10) years or less. Upon expiration of that retention period, the records should be disposed in an appropriate manner as soon as possible.
  4. **LONG TERM RECORDS:** Records with long term retention are documents (including some email) which have significant administrative, legal, and/or fiscal value and have a life that is typically longer than ten (10) years. Upon expiration of that retention period, the records should be disposed in an appropriate manner as soon as possible.
  5. **INDEFINITE RECORDS:** Records with an indefinite retention are documents (including some email) which have significant administrative, legal, and/or fiscal value; further they have an enduring administrative or historical value, and therefore may be retained until such a point in time as a reappraisal of their value to the organization is conducted.
  6. **PERMANENT RECORDS:** Records with a permanent retention records are documents (including some email) which have significant administrative, legal, and/or fiscal value; further they have an enduring historical value and therefore may be retained forever.

## II. PROCEDURES

### A. RECORDS RETENTION SCHEDULES:

A record series is a group of related records filed and/or used together as a unit and therefore evaluated as a unit for retention and disposition purposes.<sup>9</sup> A records retention schedule is a comprehensive list of record series, indicating for each the length of time the series is to be maintained and its disposition.<sup>10</sup>

Ohio State's *General Records Retention Schedule (General Schedule)*<sup>11</sup> accounts for the management and disposition of university record series that are common to many units across campus. In addition, there are units on campus that have record series that are unique to their operations and therefore have a unique records retention schedule<sup>12</sup> in addition to the *General Schedule*. All schedules, general or unique, are developed by the University Archives in consultation with campus and unit representatives.

All Ohio State units must familiarize themselves with the *General Schedule*, and have an understanding of what records—paper-based and electronic—they create and/or receive and are required to manage. Units must conduct an inventory of their records and map them to the *General Schedule*.

If a unit identifies record types that do not map to the *General Schedule*, the unit should contact the University Archives to discuss the creation of a unique schedule. All unit unique schedules must be signed by the University Archivist and an appropriate unit representative.

## B. DISPOSITION:

Part of any effective records management program is the timely disposition of obsolete records and the documentation thereof. Ohio State units have two general disposition options:

1. **Records Destruction:** A record series must exist on an approved schedule if it is to be disposed. The Ohio State unit needs to confirm that the retention period of the documents has expired and that there is no legal hold on the records (see Section II.C. below). Destruction can be accomplished in a variety of ways:
  - a. recycling
  - b. trash
  - c. incineration
  - d. maceration
  - e. shredding
  - f. pulping
  - g. demagnetization (or other electronic destruction)

If restricted information, as defined in Ohio State's Policy on Institutional Data, is evident, records should be destroyed in a secure manner<sup>13</sup> such as incineration, maceration, shredding or pulping, the most common method being that of shredding.

Before actually disposing of the records, the Ohio State unit should complete and forward a Certificate of Records Destruction (CRD)<sup>14</sup> to the University Archives for review and permanent retention. Units are strongly encouraged to conduct a records purge at a minimum of an annual basis.

Due to the low informational value, high volume, and frequency of disposal, a CRD does not need to be completed for the routine disposal of transient records.

2. **Records Transfer:** Some records created by Ohio State units have or may have enduring historical value and should be transferred to the University Archives once they have served their useful life as dictated by the records retention schedule. The disposition for these records are typically noted as "Transfer to Archives" or Archival Review". If the unit has determined that records should be transferred to the Archives, please follow the procedures detailed at:  
<http://library.osu.edu/sites/archives/retention/disposition.php#transfer>.

## C. RECORDS REQUESTS AND LITIGATION HOLDS:

As previously noted, Ohio State's records are public records, and therefore must be made available, with certain exceptions, for public scrutiny as per the Ohio Revised Code.<sup>15</sup> While Ohio law does not state

when records are to be provided, the statute requires that Ohio State provide copies of existing records that are requested with reasonable specificity, within a reasonable period of time. Additional information regarding the handling of public records requests can be found at: <http://legal.osu.edu/publicrecords.php>.

When a legal action is brought against the university, Federal<sup>16</sup> and State of Ohio<sup>17</sup> Rules of Civil Procedure allow for a discovery motion to be made to examine Ohio State records—paper-based and electronic—related to the litigation. A litigation hold should be placed upon the records and the disposition process suspended until such time as the litigation is resolved. Please contact the Office of Legal Affairs for additional information.

#### D. DOCUMENT CONVERSION:

Document imaging is the conversion of paper-based documents to digital images, making them readily accessible, thereby enhancing the business processes and workflows of Ohio State units. The Ohio Electronic Records Committee—an ongoing collaboration, established by the State of Ohio Archives in 1998, with representatives from state and local government, academia, and historical societies—has developed guidelines regarding document imaging best practices. This guidance can be found at: <http://www.ohiohistory.org/ohiojunction/erc/imagingrevision/revisedimaging2003.html>.

There is nothing in Ohio state law or regulations that prohibit a public agency from disposing of the original paper records once they have been imaged. However, before embarking on a document imaging project and/or disposing of converted records, Ohio State units should develop local imaging system policies and procedures in consultation with the University Archives. The policies and procedures document should identify:

1. the governance of the project
2. the records being imaged/converted and their mapping to the *General Schedule* and/or unit unique schedule
3. the hardware/software being utilized for imaging/conversion
4. a brief step-by-step description of the actual process (i.e. a “How To” manual)
5. scanning resolution and file format
6. the indexing schema for retrieval and ultimate disposition of the records
7. the quality control process (operator and supervisory)
8. the back-up and data recovery plans
9. the redaction process for restricted information (FERPA, HIPAA, et al)<sup>18</sup>
10. a buffer time, post-imaging before the paper records will be destroyed
11. the process for the disposal of paper records in a manner that maintains confidentiality
12. an acknowledgment that imaged records must be destroyed at the end of their life, per the retention schedule and a that Certificate of Records Destruction must be submitted at that time

## III. RESPONSIBILITIES

POSITION OR OFFICE	RESPONSIBILITIES
University Archives	<ol style="list-style-type: none"> <li>1. Development of the university's <i>General Records Retention Schedule</i></li> <li>2. Development of unique records retention schedules for appropriate Ohio State units</li> <li>3. Oversight of records destruction process including permanent retention of Certificates of Records Destruction</li> <li>4. Providing retention, storage and access to historic university records</li> <li>5. Education of Ohio State personnel in records management policy and procedures</li> <li>6. Assistance in the development of local records policies and procedures</li> </ol>
Office of Legal Affairs	<ol style="list-style-type: none"> <li>1. Assistance in the handling of discovery requests</li> <li>2. Assistance in the handling of public records requests</li> </ol>
Ohio State Units	<ol style="list-style-type: none"> <li>1. Providing for the retention, storage, access, and disposition of university records in compliance with Ohio State's General Records Retention Schedule, and if appropriate, a unit unique schedule.</li> <li>2. Processing of e-Discovery requests</li> <li>3. Processing of public records requests</li> <li>4. Integrating document conversion projects into a localized records management program.</li> </ol>

## IV. CONTACTS

SUBJECT	OFFICE	TELEPHONE	EMAIL ADDRESS
Litigation and e-Discovery	Office of Legal Affairs	614.292.0611	<a href="mailto:lemmon.31@osu.edu">lemmon.31@osu.edu</a> (Mark Lemmon) <a href="mailto:shumate.13@osu.edu">shumate.13@osu.edu</a> (Kim Shumate)
Public Records	Office of Legal Affairs	614.292.0611	<a href="mailto:baumann.91@osu.edu">baumann.91@osu.edu</a> (Kendra Baumann) <a href="mailto:neiger.4@osu.edu">neiger.4@osu.edu</a> (Jan Neiger)
Records Management: Document Imaging and Conversion, Electronic Record Management, Records Disposal and Transfer, and Retention Scheduling	University Archives	614.292.2409	<a href="mailto:chute.6@osu.edu">chute.6@osu.edu</a> (Tamar Chute)

## V. HISTORY

Issued: University Operating Manual, Section 9, April, 1967  
 Edited: University Operating Manual, Section 9, July, 1970  
 Re-issued: University Operating Manual, Section 9, July, 1971  
 Re-issued: University Operating Manual, Section 9, July, 1972  
 Revised: April, 2010

## VI. RESOURCES

<sup>1</sup> The Board of Trustees approved the hiring of OSU's first archivist, Bruce Harding in September 1965. Secretary of the Board of Trustees, John Mount, announced the appointment in a memo dated October 8 1965, to Dean's, Department Chairs, and Administrative heads that Harding was to provide leadership for "...the development of a program which is designed to produce an effective system for the creation, use, maintenance, and disposition of University records..."

<sup>2</sup> John Mount, as the official records officer of OSU, chaired the Archives Advisory Committee that represented the financial, academic and administrative leadership of the University. On April 18, 1966 he convened the first meeting of the Archives Advisory Committee charging the University Archivist "...to prepare a chapter for the 'Procedures Manual' and submit it to the Committee members for consideration. The concept of using 'Schedules of Records Retention and Disposition' was approved and the Archivist is to include the procedure for their development in the procedures manual." By April of 1967 Section 9 had been written, approved, and distributed to all units of the University.

<sup>3</sup> [http://trustees.osu.edu/assets/files/minutes/documents/071108\\_000.pdf#page=43](http://trustees.osu.edu/assets/files/minutes/documents/071108_000.pdf#page=43) (link updated July 2, 2014)

<sup>4</sup> Ohio Revised Code (ORC) 149.33(B) LAW Writer® Ohio Laws and Rules <http://codes.ohio.gov/orc/149.33> Accessed 2/23/2010

<sup>5</sup> <http://www.iuc-ohio.org/public-policy/records-retention/> (link updated July 2, 2014)

<sup>6</sup> [http://trustees.osu.edu/assets/files/minutes/documents/071108\\_000.pdf#page=43](http://trustees.osu.edu/assets/files/minutes/documents/071108_000.pdf#page=43) (link updated July 2, 2014)

<sup>7</sup> Ohio Revised Code (ORC) 149.011(G) LAW Writer® Ohio Laws and Rules <http://codes.ohio.gov/orc/149.011> Accessed 1/26/2010

<sup>8</sup> "...records kept by any public office, including, but not limited to, state, county, city, village, township, and school district units, and records pertaining to the delivery of educational services by an alternative school in this state kept by the nonprofit or for-profit entity operating the alternative school pursuant to section 3313.533 of the Revised Code." LAW Writer® Ohio Laws and Rules <http://codes.ohio.gov/orc/149.43> Accessed 1/26/2010

<sup>9</sup> *Glossary of Records and Information Management Terms, 3<sup>rd</sup> Edition*, Page 21, ARMA international

<sup>10</sup> *Glossary of Records and Information Management Terms, 3<sup>rd</sup> Edition*, Page 22, ARMA international

<sup>11</sup> The OSU *General Records Retention Schedule* can be found at: <http://go.osu.edu/retention-schedules> (link updated July 2, 2014)

<sup>12</sup> A complete listing of units with unique and when the schedule was last updated can be found at: <http://go.osu.edu/unique-schedules> (link updated July 2, 2014)

<sup>13</sup> The Ohio State University Policy on Institutional Data <http://ocio.osu.edu/policy/policies/policy-on-institutional-data> (link updated July 2, 2014)

<sup>14</sup> <http://go.osu.edu/crd> or <http://go.osu.edu/crd-pdf> [May not render correctly in browser; download PDF and open in [Adobe Reader](#)] (link updated July 2, 2014)

<sup>15</sup> Ohio Revised Code (ORC) 149.43(A)(1) LAW Writer® Ohio Laws and Rules <http://codes.ohio.gov/orc/149.43> Accessed 1/26/2010

<sup>16</sup> <http://www.law.cornell.edu/rules/frcp/Rule26.htm> Accessed 2/24/2010

<sup>17</sup> <http://www.supremecourt.ohio.gov/LegalResources/Rules/civil/CivilProcedure.pdf> Accessed 2/24/2010

<sup>18</sup> The Ohio State University Policy on Institutional Data <http://ocio.osu.edu/policy/policies/policy-on-institutional-data> (link updated July 2, 2014)