

Applies to: All faculty, staff, student employees, vendors, and volunteers

Responsible Office

Office of Academic Affairs - University Archives

POLICY

Issued: 04/01/1967
Revised: 04/01/2010
Edited: 10/01/2018

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

- A. document our management decisions;
- B. provide historical references of transactions and events;
- C. comply with laws and regulations;
- D. enhance our organization's operational efficiencies;
- E. provide litigation support; and
- F. preserve the university's institutional memory.

Purpose of the Policy

In compliance with [Ohio Revised Code 149.33\(B\)](#), the Records Management policy establishes a program for the creation, preservation, and disposition of records created by the university.

Definitions

| Term | Definition |
|--------------------|--|
| Disposition | Final destruction or transfer to the archives. |
| Record | 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. |
| Record Series | A group of related records filed and/or used together as a unit and therefore evaluated as a unit for retention and disposition purposes. |
| Retention Period | The length of time records should be kept in a certain location or form for administrative, legal, fiscal, historical, or other purposes. |
| Retention Schedule | Comprehensive list of record series, indicating for each the length of time the series is to be maintained and its disposition. |

Policy Details

- I. Authority
 - A. 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; and
 - 2. relate the roles of the faculty and staff and/or student organizations to the operational activities of Ohio State or campus life.

University Policy

Applies to: All faculty, staff, student employees, vendors, and volunteers

- B. This authority, originally established by Board of Trustees actions in 1965 and 1966, and set forth in Section 9 of the Ohio State Operating Manual, was reaffirmed by the [Board of Trustees' Resolution No. 2009-11](#) 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 using efficient and economical management methods for the creation, utilization, maintenance, retention, preservation, and disposition of the records.

- C. To apply efficient and economical management methods, the Inter-University Council of Ohio (IUC)—the fourteen public universities in Ohio—has chosen to develop a [model records retention schedule](#) 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. This process establishes an expectation for and consistency in the management of records for these public institutions of higher education.

II. Why Do We Keep Records?

- A. 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.

III. What Is a Record?

- A. 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; or
 7. sound recordings, video recordings or photographs of university faculty, staff, groups or events.
- B. 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). Subsections (a) through (aa) define what documents are not public records and/or what information in a public record is not disclosable.

IV. How Long Do We Keep Records?

- A. The amount of time that Ohio State must maintain records depends upon the legal, fiscal, administrative, and/or historical informational value.
- B. 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:

Applies to: All faculty, staff, student employees, vendors, and volunteers

- 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, and/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.

PROCEDURE

Issued: 04/01/1967
Revised: 04/01/2010
Edited: 10/01/2018

I. Records Retention Schedules

- A. Ohio State's [General Records Retention Schedule \(General Schedule\)](#) 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 [unique records retention schedules](#) in addition to the General Schedule. All schedules, general or unique, are developed by the University Archives in consultation with campus and unit representatives.
- B. All university 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.
 1. Units must conduct an inventory of their records and map them to the General Schedule.
 2. 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.

Applies to: All faculty, staff, student employees, vendors, and volunteers

II. Disposition of Records

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:

- A. 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.B. below). Destruction can be accomplished in a variety of ways:
1. recycling
 2. trash
 3. incineration
 4. maceration
 5. shredding
 6. pulping
 7. demagnetization (or other electronic destruction)

If restricted information, as defined in the university's [Institutional Data policy](#), is evident, records should be destroyed in a secure manner such as incineration, maceration, shredding or pulping, the most common method being that of shredding.

Before actually disposing of the records, the university unit should complete and forward a [Certificate of Records Destruction \(CRD\)](#) 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.

- B. 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: library.osu.edu/osu-records-management/transfers.

III. Records Requests and Litigation Holds

- A. 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 and the university's Public Records Policy](#). 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: compliance.osu.edu/public-records.
- B. When a legal action is brought against the university, [Federal](#) and [State of Ohio 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. Contact the Office of Legal Affairs for additional information.

IV. Document Conversion

- A. 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

Applies to: All faculty, staff, student employees, vendors, and volunteers

developed guidelines regarding document imaging best practices. This guidance can be found at: ohioerc.org/?page_id=530.

- B. 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 local 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);
 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; and
 12. an acknowledgment that imaged records must be destroyed at the end of their life per the retention schedule and that a [Certificate of Records Destruction](#) must be submitted at that time.

Responsibilities

| Position or Office | Responsibilities |
|-------------------------|---|
| Office of Legal Affairs | <ol style="list-style-type: none"> 1. Assist with the handling of discovery requests 2. Assist with the handling of public records requests |
| Ohio State Units | <ol style="list-style-type: none"> 1. Provide 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 2. Process e-Discovery requests 3. Process public records requests 4. Integrate document conversion projects into a localized records management program |
| University Archives | <ol style="list-style-type: none"> 1. Develop the university's General Records Retention Schedule 2. Develop unique records retention schedules for appropriate Ohio State units 3. Oversee records destruction process including permanent retention of Certificates of Records Destruction 4. Provide retention, storage, and access to historic university records 5. Educate Ohio State personnel in records management policy and procedures 6. Assist with the development of local records policies and procedures |

Resources

Forms

[Certificate of Records Destruction](#), library.osu.edu/osu-records-management/evaluation

Additional Guidance

[Ohio Revised Code 149](#), codes.ohio.gov/orc/149

[OSU General Retention Schedule](#), library.osu.edu/osu-records-management/retention-schedules

[Paper & Bytes Training](#), library.osu.edu/osu-records-management/workshops

Applies to: All faculty, staff, student employees, vendors, and volunteers

Contacts

| Subject | Office | Telephone | E-mail/URL |
|--|---|--------------|--|
| Litigation and e-Discovery | Office of Legal Affairs | 614.292.0611 | lemmon.31@osu.edu (Mark Lemmon) baumann.91@osu.edu (Kendra Baumann) https://legal.osu.edu/ |
| Public Records | Office of University Compliance & Integrity – Public Records Office | 614.247.2260 | moormann.3@osu.edu (Robert Moormann) hainer.8@osu.edu (Scott Hainer) https://compliance.osu.edu/public-records/ |
| Records Management: Document Imaging and Conversion, Electronic Record Management, Records Disposal and Transfer, and Retention Scheduling | University Archives | 614.292.4092 | swift.102@osu.edu (Pari Swift) https://library.osu.edu/osu-records-management |

History

Issued: 04/01/1967
 Edited: 07/01/1970, University Operating Manual, Section 9
 Re-issued: 07/01/1971, University Operating Manual, Section 9
 Re-issued: 07/01/1972, University Operating Manual, Section 9
 Revised: 04/01/2010
 Edited: 10/01/2018