Database Records Retention and Disposition

How are Database or Information Systems records defined?

1. The database or information system itself is *not a single record*.
2. Databases/systems contain *many records*.
    a. And possibly *multiple record series.*
3. Retention and disposition should be applied routinely per university [retention schedules](#).
    a. Be careful not to break relational fields within the database when deleting records.
4. How is a record defined in the system?

Example: Online Job Application

> **Record (Ohio Revised Code 149.011G)**
>
> "Records" includes 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.
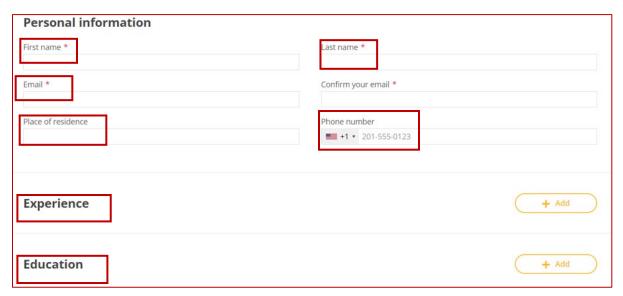
> **Record Series**
>
> Group of records that are created for the same purpose and generally contain the same types of information.

Job applications, whether in paper or online, ask for the same information, such as name, email address, phone number, experience and education. Each applicant fills out each piece of information, or fields of data, and the information is grouped or tied together by applicant.

On paper, the data for each of the fields are all grouped together in a single document. In a database, each piece of data may be in a separate cell labeled by field, but all data fields for a single applicant are tied together to form that person's application, or record.

Whether in paper or a database, the information is grouped together for the same purpose: to understand each applicant's qualifications for the job. This grouping of data for *an applicant* is the *record*. All of the employment applications taken together is the *record series*.

How long must Database or Information Systems records be kept?

As with any Ohio State records, databases or information systems retention and disposition **depends on the function and content of the record**, *not* the format or security level.

To determine how long to keep database or information systems records, start by reviewing the University General Records Retention Schedule or view the unit-unique schedules to determine which record series are contained within the database. Record series within university retention schedules:

1. Describe the *purpose and/or function* of the record (how you use the database *record*)
2. Tell what *types of information* are found in the record (content captured in the database *record*)
3. Explain how long the *record* must be kept.

If a record series cannot be found that fits with the records held within the system, contact University Records Management to update the retention schedule.

Is it acceptable to keep Database or Information Systems records indefinitely?

NO: Database records should be managed just as any other type of records are managed; they should be securely destroyed when retention has been met, as long as deleting the record does not negatively impact other records in the database. Without periodically deleting database records that have met retention:

- It becomes more difficult to locate records for business purposes, public records requests, investigations, or litigation.
- Too many unnecessary records impact the performance of the database or information system and may be costly in staff time and expenses for to maintain or migrate.
- The number of records affected during a security/privacy incident and the cost of responding to and recovering from the incident increases.

Records disposition should be a routine process conducted at regular intervals, not just when the system is being decommissioned or the contract with the vendor is expiring.

A Certificate of Records Destruction must be submitted to University Records Management for approval, a minimum of 1 week prior to deleting database records for manual disposition. If the system has capabilities to automate disposition, contact University Records Management to work out a plan for documenting disposition in a manner that will meet legal requirements.

Changing or Decommissioning Database or Information System Software

Before decommissioning or changing databases or information systems, review the records to determine:

1. Which records have met retention (should be deleted, not be migrated).
2. Which records still need to be maintained per retention schedules (should be migrated or exported).
3. Perform an analysis of the specific data fields that form the records to ensure that:
   a. no relationships will broken by deleting data that has met retention
   b. fields needed to query for records that have met retention, often date fields, are not altered during the migration.

Contact University Records Management prior to deleting records or migrating to a new system to ensure that the records retention and disposition policies can be appropriately met.

A Certificate of Records Destruction must be submitted to University Records Management for approval, a minimum of 1 week prior to deleting database records.

Procuring New Database or Information System

When evaluating potential new software, ask questions about how the system can routinely delete records at the end of their retention period. This goes beyond ensuring that the vendor has a policy for deleting data at the end of your contract. Ask questions such as:

- Can the system be programmed to automatically delete records in accordance with our retention schedules?
- Is manual deletion done by the customer or company?
- Can different record series be deleted on different retention periods?
- How can we set up queries to determine which records have met retention?
  - What fields can we query for flat retention periods (3 years, 5 years, etc.)?
  - What fields can we query for event-triggered retention periods (3 years from separation, 3 years from grant close-out, etc.)
- Is there a report that can be run that provides information on the disposition? What type of information does the report include?

University Records Management is willing to meet with units and vendors to talk through questions and functionality relating to the disposition of records.

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Records Management Tip Sheets and Guidance