

## Records Retention

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Contact: Policy Administrator

### Introduction

There are three guiding purposes for this records retention policy:

- **Accountability.** This policy is written to assure compliance with state and federal law. As a public institution, the university has an obligation of accountability. By preserving university records, the institution documents its policies, actions and determinations.
- **History.** Key records of the institution document its history and its character.
- **Efficiency.** An appropriate records retention policy assures maintenance of records needed for ongoing operations. Conversely, records that are no longer useful should be discarded or archived to increase efficiency.

This policy addresses the identification of records and the duration for retaining institutional records. The “Records Retention Guidance and Schedule” (see Resources) is a companion resource and an element essential to compliance with this policy.

### Policy Statement

All faculty and staff have responsibility for identifying and retaining university records—paper and electronic—in accordance with the Records Retention Guidance and Schedule. Records are to be archived or destroyed after the retention period, subject to the exceptions stated in this policy regarding retention for audit and litigation purposes.

#### Identification of University Records

Initially, a determination must be made as to whether the record is a

- University record that is subject to this policy, or a
- Transitory record which is not subject to this policy

Consistent with Iowa Code §305.2(9), Iowa State University records are defined as any document, book, paper, electronic record, photograph, sound recording, or other material, regardless of physical form or characteristics, containing information, and which is made, produced, executed, or received in connection with the transactions and activities of the university.

By law or contract, a university record may be subject to federal ownership or regulation. Such records will be maintained as required by the applicable legal or contractual provisions.

*Active, inactive, and/or archival* retention periods are specified for *university records*. Some records may be *transitory* only and for these records no retention is required. And, for the purposes of this policy, library and museum material made or acquired and preserved solely for reference or exhibition purposes, and stocks of publications and unprocessed forms are not university records.

Definitions of the retention periods and other terms related to records retention are located within the Records Retention Guidance and Schedule (see Resources below).

## Records Retention Schedule

All faculty and staff have responsibility for complying with the provisions of the Records Retention Schedule which addresses the management and preservation of specific university record types. The Schedule indicates the required

- Duration for which each record type must be retained
- Responsibility assignments for the management of active records, the storage of inactive records, and the archival of permanent records
- Confidentiality of each record type
- Disposal method (if applicable)

Permanent retention: The University Archives must be consulted regarding permanent storage decisions. Permanently retained records are to be stored in a media form and location that will adequately endure the passage of time.

## Exceptions

### Caution: Audit, Litigation, or Public Records Request

A university record may not be destroyed if any audit, litigation, public records request, claim, negotiation, open administrative review, or other action involving the record is initiated before the expiration of the retention period as indicated in the Records Retention Guidance and Schedule. Records must be maintained until all required audits and requests are completed and should be retained beyond the listed retention periods when there is a probability of litigation either involving records or requiring their use. If the Offices of University Counsel, Internal Audit, or Research Assurances, or the Research Integrity Officer have issued a litigation or legal hold, records relevant to the issue must be preserved until the hold has been released.

### Redundancy

Excess copies of records should be destroyed when they cease to be useful and should never be kept longer than the university record. Stocks of obsolete forms or pamphlets are not considered to be university records and are not subject to this policy or the Records Retention Guidance and Schedule.

## Disposal of Records

University records that are not archived permanently will at some point be subject to disposal.

### Expired Records

The unit chair or director (or designee) is responsible for conducting an annual review to identify records with expired retention periods. The disposition of expired records must be handled in a systematic manner. If an expired university record is to be destroyed, the unit chair or director must preauthorize the destruction.

### Secure Destruction

The unit chair or director is responsible for assuring the secure destruction of sensitive or confidential records that will no longer be retained. Secure destruction is required for records containing confidential information. Paper records must be shredded or destroyed in a manner to make them unreadable. Digital media must be scrubbed or destroyed using current industry standards. See Resources section below for “Confidential Document Destruction.”

## Resources

[Confidential Document Destruction](#)

[Confidential Records - Students](#)

[Employee Records](#)

[Iowa Code §305.2\(9\) Definition of “Record”](#)

[Office of the Executive Vice President and Provost](#)

[Public Records Requests](#)

[Records Retention Guidance and Schedule](#)

[Social Security Number Protection Policy](#)

[University Archives / University Library Special](#)

[Collections](#)

[University Counsel](#)

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