

# Records Management Best Practices

## Purpose of Records Management

The University's records management program serves several purposes, as stated in the [Records Management Policy](#):

*The purpose of this policy is to assist the University in complying with external record-keeping requirements, managing University risk and preserving the history of the University. By following this policy, each unit across campus can ensure that the University is compliant with DU policies, state and federal regulations. The proper maintenance of records also benefits the University because it allows for easier access to documents and a reduction in the physical space and costs attributed to storage.*

## University Personnel Responsibilities

University personnel, including all University officials such as faculty, visiting faculty, staff, student workers, volunteers and others whose scope of work may include management of records, are entrusted with the day-to-day management of records in their units according to the University Records Management Policy and the [University Records Retention Schedule](#).

## Records Retention/Disposition & Office of Primary Responsibility

Regarding the retention and disposition of records, the Records Management Policy provides:

*The University Records Retention Schedule will define how long records should be retained, the Office of Primary Responsibility ("OPR") for a record, and the ultimate disposition of the record: destruction or permanent retention in an archival environment. The Office of General Counsel will review schedules for compliance with all applicable statutory and regulatory requirements. As a general guideline, records containing personal data should be retained only as long as needed to comply with applicable legal requirements and as long as needed for business purposes. Personal data retained for solely archiving purposes should be retained in accordance with the principle of data minimization, which may include the use of pseudonymization."*

The OPR for a particular type of record, also known as the "Owner," is the unit that is accountable for maintaining the official/master record and ensuring that it is properly stored and disposed of in accordance with the Records Retention Schedule. While units other than the OPR may choose to keep copies of records that are owned by the OPR, they are not required to keep such copies, as the OPR is ultimately responsible for maintaining the official/master record and should be able to produce copies for other units as needed. If other units choose to keep copies, they may keep them for as long as required to serve business purposes, **but no longer than the retention period of the official/master**

**record.** When disposing of a copy prior to the end of the retention period, units should always check with the OPR to confirm that the OPR is maintaining the official/master record.

Sometimes units other than the OPR create records that are owned by the OPR; in such situations, the unit that created the record should transfer the record to the OPR and retain any copies as needed. To transfer a record to the OPR, the transferrer should contact the OPR’s Records Management Liaison listed on the [Records Management Liaison Contact List](#).

### Example

As shown below, for the record type labeled “Claim Files,” the Records Retention Schedule provides that Enterprise Risk Management is the OPR. Therefore, when a unit other than Enterprise Risk Management creates “[r]ecords related to insurance claims, including workers' compensation claims,” that unit should transfer the record to Enterprise Risk Management by contacting the Enterprise Risk Management Records Management Liaison who is identified on the Records Management Liaison Contact List. The unit that originally created the record is welcome to keep copies as needed (but is not required to do so) and must dispose of any copies by “5 years after the claim is closed,” which is the retention period provided by the Records Retention Schedule for “Claim Files.”

Owner	Record Category	Record Name	Record Description	Retention Period	Disposition
Enterprise Risk Management	Administrative	Claim Files	Records related to insurance claims, including workers' compensation claims.	5 years after the claim is closed	Destroy

When the Records Retention Schedule lists “All Offices” as the OPR, this means that all offices are accountable for maintaining the official/master record and ensuring that it is properly stored and disposed of in accordance with the Records Retention Schedule. For example, the Records Retention Schedule lists “All Offices” as the owner of “Budget – Final Approved” records, which means that all units are responsible for maintaining their own records of “[f]inal budget requests and official, approved budgets.”

The drop-down menu in the top left corner of the Records Retention Schedule can be used to filter the Schedule by OPR. By default, the Records Retention Schedule is unfiltered, displaying its full contents, until an OPR is selected from the drop-down menu.

## Records Inventory

All units are encouraged to create and maintain a records inventory for the unit. A records inventory is a list of all the types of records that the unit creates and/or possesses. This list should contain (1) a descriptive title for each type of record; (2) designation of whether the unit is the record’s OPR or whether the unit is merely keeping the record as a copy; and (3) the record’s content, retention period, and disposition instructions, as provided by the Records Retention Schedule. Units should use their records inventories in order to perform self-audits to evaluate the effectiveness of the unit’s record retention and disposal practices.

### What is a “Record”?

A record is anything that is created, received, recorded, or legally filed in the course of fulfilling the University’s mission, which contains information that provides evidence of the University’s business transactions, activities, organization, or history. **Records can be in any format, including physical (paper) or digital (electronic), and records are not limited to the types that are listed on the Records Retention Schedule.** When units have records that are not listed on the Records Retention Schedule,

they may consult the Enterprise Risk Management Compliance Analyst for guidance, or they may apply the Schedule’s 5-year retention period that is provided for “Not Listed” records:

Owner	Record Category	Record Name	Record Description	Retention Period	Disposition
All Offices	Other	Not Listed	This classification applies to all records not listed on this schedule - whatever the record type.	5 years	Destroy

## Types of Records

University records may include, but are not limited to, student records, personnel records, financial records, contracts, grant materials, curricula, University publications, committee meeting minutes, memoranda, correspondence, and audio/visual media.

## What is *not* considered a “Record”?

Items that are not considered records include, but are not limited to, personal correspondence, reference/use copies of University records and non-University publications (magazines, journals). Any copies that a unit chooses to keep are not considered “records,” and may therefore be disposed of at any time before the expiration of the retention period provided by the Records Retention Schedule, as explained above.

## Electronic Records

The University is committed to managing the most authentic, sustainable, complete, and useful version of a University record, regardless of format; therefore, like physical records, electronic records must adhere to the University Records Management Policy and the Retention Schedule. Units may convert physical records to an electronic format, as federal law provides that electronic records are generally just as good as their paper equivalents, so long as they are authentic reproductions or representations that can be legibly converted to paper format. However, while electronic formats provide many benefits, they also expose the records to greater risk of data breaches, especially if the electronic records are not properly secured. To ensure that electronic records are properly secured, units should comply with IT’s [Requirements for Secure Computing Policy](#).

## Destroying Records

When it is necessary to dispose of paper or electronic documents that contain “personal identifying information,” as defined by CRS 6-1-713,<sup>1</sup> Colorado law and the University Records Management policy require such documents to be destroyed by shredding, erasing, or otherwise modifying the personal identifying information in the paper or electronic documents to make the personal identifying information unreadable or indecipherable through any means. When records do not contain any “personal identifying information,” units may dispose of such records in the manner they see best fit.

## University Archives

Rather than being destroyed, there are certain records that should be transferred to University Archives once the retention period expires. The Records Retention Schedule indicates which types of records should ultimately be transferred to University Archives, including, but not limited to, the following:

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<sup>1</sup> CRS 6-1-713 defines “personal identifying information” as “a social security number; a personal identification number; a password; a pass code; an official state or government-issued driver's license or identification card number; a government passport number; biometric data, as defined in section 6-1-716 (1)(a); an employer, student, or military identification number; or a financial transaction device, as defined in section 18-5-701 (3).”

- Historical items: Any item that is illustrative of the history of the University or one of its component organizations. Scrapbooks, print matter, clippings, still and moving images, photographs, digital images, microfilm, audio, video, digital media, negatives, slides, video, audio, film, recordings;
- Academic Councils and Committee Documents: Agenda, official minutes, summary of actions;
- Project or Research Data: Data generated from research, project or other departmental sponsored or unsponsored project related documents;
- Theses and Dissertations: Any thesis or dissertation produced as part of the degree requirement for a master's or doctoral program;
- Accreditation Reports, Self-Studies, Supporting Materials: Accreditation process, research, and self-study documentation for any level of required accreditation. Self-study, statistical data, committees, associations, observations, official responses, correspondence, academic program reviews, study of departmental goals and performance, narratives, statistical data, surveys, course evaluation.

For more information about University Archives, or to arrange a transfer to University Archives, contact Kate Crowe ([Katherine.Crowe@du.edu](mailto:Katherine.Crowe@du.edu)) or Nancy Jones ([Nancy.N.Jones@du.edu](mailto:Nancy.N.Jones@du.edu)).

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