

# **The Records Disposition Authority Policy**

**of the**

**University of South Alabama**



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## 1. **Overall Management Of Records At USA**

This policy covers the creation, maintenance, and disposition of records (records management) at the University of South Alabama (USA). USA is committed to maintaining its records in an efficient and accessible manner as a vital source of information for its employees, as well as the state's citizens. Accordingly, President V. Gordon Moulton in April 2003 appointed two individuals as USA's Record Officers:

- Dr. Richard Wood, Dean of University Libraries, and
- Mr. Ken Davis, Assistant Vice President for Financial Affairs and Director of Tax Accounting

They will oversee records management policies, procedures, and practices at USA (except for hospital patient records) and carry-out the provisions of the Code of Alabama 1975, Sections 36-12 and the "Functional Analysis & **R**ecords **D**isposition **A**uthority" (hereafter called **RDA**) for Public Universities of Alabama issued by the State Records Commission and administered by the Alabama Department of Archives and History (ADAH).

## 2. **Creation, Maintenance, & Protection of Records**

Each USA employee is required by law to create, maintain, and protect the records that document the operations of their offices according to state law (see above). Employees of USA should be aware of the **RDA** because it is used to make decisions regarding the retention and disposition of records, regardless of format. E-mail, spreadsheet, word-processed and other electronic documents, files, and databases must be retained for the same time period as their paper equivalents. Records covered by the RDA are to be retained and protected by the custodian of those records until the retention period has expired. When the retention period has been satisfied, the records should be disposed of in the appropriate manner (see 9. Destruction of Temporary (Non-permanent) Records). It is the responsibility of every state employee, therefore, to

follow RDA retention schedules for the records in their custody, as well as ensure that any personal copies of official records are destroyed or transferred as outlined in the RDA. All employees are also responsible for reporting any actual or threatened loss or removal of records to the agency records officer.

To safeguard records in large departments, record custodians may find it advisable to develop a “check-out” or tracking system when anyone removes a record from a file drawer, storage box, or storage room. Record custodians may also want to send out reminders to colleagues, train new employees about records management, and require employees to attend training sessions.

### **3. Public Access To Records**

USA’s operational records are open to public inspection by law (Code of Alabama 1975, Section 36-12-40) unless otherwise restricted. It is assumed that requests may be made during normal business hours (Monday through Friday, 8:00 a.m. through 5:00 p.m., or as posted in individual offices at USA). There are, however, some types of documents that offices can restrict public access to as follows:

- medical patient records
- employee records
- student records
- library circulation records
- fragile or brittle records

Administrators or records custodians who are not sure about the confidentiality or privacy of records are encouraged to talk the Records Officer, Personnel Relations, or the University Attorney as appropriate. The ultimate authority on questions of this nature is most likely to be the University Attorney, Ms. Jean W. Tucker, 0131 AD (460-6294).

#### 4. **Definitions**

A **Record** is any paper document, e-mail message, file, video, audio tape, microfilm, microfiche, computer disk, or other communication that is created or acquired by an employee of USA in the course of conducting his or her job; such records under state law belong to the government, not the employee. It is important to recognize that every record does NOT have to be retained. The **Record Copy** or Copy of Record is the document, tape, video, etc., that the university recognizes as the official copy; it must be retained and destroyed according to this RDA Policy. Other records may be shredded or destroyed.

**Records Management** at USA refers to all of the policies and procedures with respect to organizing, filing, maintaining, transferring, preserving, deleting, or destroying any document, publication, report, file, video or audio tape, electronic media, microfiche or film, or other communication in any format. USA's **Record Officers** are Richard Wood and Ken Davis. USA's **Record Custodians** are the employees designated by administrators across campus to maintain office records in accordance with the RDA.

**Permanent Records** at USA include any records that document state business created prior to 1900 and the following: **Vital Records** such as birth & death certificates, student recruitment materials and records (3-2), student and faculty/staff handbooks (3-3, 14); course and curriculum records (3-3), USA Archive collections and records/files (3-4), student publications (3-7), grade sheets and statistics (3-11), graduation lists (3-11), individual student academic records (3-12), Board of Trustees minutes and files of the President, final budget and financial reports and documentation (3-17), accreditation records and final assessment reports (3-15), minutes of standing and ad-hoc committee minutes (3-14), university publications and certain publicity (3-15), certain athletic records (3-8), and all final and annual reports of all offices. "Permanent" means to retain forever. USA's Records Officer should be notified if any permanent records have been destroyed, lost, or stolen.

**Temporary Records** at USA are all other non-permanent records that document state business and are listed in the RDA. Their retention period varies greatly from “useful life” to 50 or more years. Temporary records may be kept longer than the published retention period if there is a good reason such as a court case, grievance, or other administrative matter.

**5. Organization of Records**

All records, including those in non-paper formats such as electronic or microfilm, should be organized and filed “properly”—and in a timely manner in order to facilitate access by employees of the unit or department. “Properly” means filed in a logical, systematic, and consistent manner so that an employee’s successor or colleague(s) can locate documents that may be needed. While USA has no universal filing requirements, some conventions make sense. If possible, records of the same or similar retention period (correspondence for example) should be filed together by date. If a filing system is complex, a printed list showing how files are organized may be necessary. Input from co-workers may help to establish a system that is understood and accepted.

To free up storage space, record custodians should establish cutoff/closing periods for files after which they are boxed up and moved to storage or removed from hard-drives and placed on tape, diskette, or CD-ROM. Policies covering filing, records organization and storage are the responsibility of each department’s or unit’s chief administrator. No university-wide guidelines have been established because each office’s circumstances or records are likely to be unique.

**6. Storage of Records**

Each office will normally store all of its own temporary and permanent records. However, see TRANSFER OF RECORDS TO USA ARCHIVES (8) BELOW.

7. **Destruction of Copies & Transitory or Duplicate Records**

There are a variety of records that any state employee may discard or destroy without the permission of USA's Records Officers. No forms need to be completed to discard or destroy the following types of records:

- Convenience or duplicate copies of memorandum, notices, correspondence, reports, publications, or temporary records such as drafts of such material kept solely for easy reference, short-term use, and internal office purposes (so long as some other [usually originating] office maintains the original record for the required retention period).
- Catalogs, journals, and other publications received by you/your office from other entities.

8. **Transfer of Records to USA Archives**

Records with a retention period of "Permanent Record" are not to be destroyed and normally are retained by the department, office, or division that originated them. Otherwise, USA Archives is likely to be the designated storage entity for most academic and administrative offices, but not for medical and hospital records. Record Custodians must complete the Permanent Records Transmittal Request, send it to Archives, and receive a reply before transferring records to the Archives.

A similar form (Temporary Records Transmittal Request) is used to transfer temporary records to the USA Archives. Special boxes of a certain size are used for records transferred to USA Archives; failure to use the specified boxes may result in a charge to the office sending the records. Call the Archives for more information (434-3800).

In rare situations, records may also be transferred to the Alabama Department of Archives and History when the university office no longer has an administrative need for them. However, permission from the USA Records Officer is necessary to do so because this option is one most departments can not afford.

## 9. **Destruction of Temporary (Non-Permanent) Records**

Once the retention period for temporary records has expired, the record custodian or employee should complete a Records Destruction Notice and mail it to the Records Officer. Permission to destroy records covered by this policy must be obtained prior to actual destruction. Only the designated agency USA Records Officers may authorize that the records are eligible for destruction by signing and returning the Records Destruction Notice to the records custodian. Only then can the records custodian or employee destroy those particular records.

No records are to be destroyed that are necessary for agency compliance with requirements of the state Sunset Act, an agency audit, any legal notice, or subpoena. Acceptable methods used at USA for destruction include the following:

- discarding of records in the trash can or placing the material in a recycle box when such records do not contain financial, personnel, or other sensitive personal information that should be shredded. Most material placed in the trash ends up in a landfill, while material placed in a recycle box is recycled and produces revenue for the university. Please recycle all paper and cardboard that you can.
- shredding (required for financial data, personnel records, and sensitive information)

There is no centralized office for shredding documents in most administrative or academic offices at USA; most departments are responsible for their own costs of shredding.

## 10. **Disposition and Retention of Electronic Records**

Data or reports, regardless of source, licensing or ownership, generated by USA employees may or may not constitute a record that must be retained according to this RDA Policy. To keep from becoming inundated in a sea of computer output, it is important to establish whether a computer generated output or report is a record defined by this policy. When any computer generated output becomes an integral part of, or attachment to, a record covered by this RDA Policy, it presumably must be retained as part of that record for the designated

retention period. When any computer-generated output is used or gathered merely as input (raw data for instance), or to draw conclusions, etc., it may not need to be retained in most circumstances, particularly if it is database information that other employees may access. If the computer output may be needed for audit, legal, risk management, tax, or similar purposes, the chief administrator of the unit or department or the Records Officer(s) may need to be consulted.

While the retention period for electronic records is the same as their paper equivalent according to the RDA, their disposition may differ because of the way they are stored in computer memory, magnetic tape, and other modes of storage. It may be necessary or advisable, for instance, to print copies of e-mails, spreadsheets, and correspondence and retain the paper copy as the official document, or copy of record. Doing so allows the electronic document in paper format to be filed or stored with other types of records in the same series. Computer operating systems, hardware, and application software changes also may make it practical to retain paper copies if the retention period is longer than one to three years. It should be noted that printing an electronic copy of some documents may alter its formatting or appearance. Every attempt should be made to replicate the original before the electronic medium (tape or disc) is erased or destroyed.

Retention of FRS Banner or similar computer system reports is normally the responsibility of the requesting department or administrator. The Computer Services Department (CSD) generally only processes reports requested by departments by pulling certain data from a massive system database. The CSD sends the report to the requestor, but does not retain such reports. Record custodians, therefore, must normally retain all system reports requested by their departments from the CSD for the required RDA retention period. The retention requirements may be satisfied if the ability to create the report from the database exists for the duration of the retention period. For example, data entered into the Banner database pertaining to records of funds deposited outside the state treasury must be retrievable in a legible format for at least three years after the end of the fiscal year in which the data were created. If for any reason it is not possible to

use the database to satisfy this requirement, it is the responsibility of the department or administrator originating the database entries to satisfy the retention requirements by other means.

Certainly, it is not advisable to maintain most permanent records only in an electronic media such as a disk or tape. Paper and silver-halide microfiche or microfilm is considered acceptable for permanent records. In the rare instance that paper copies are scanned for preservation, all retention and disposition provisions of the RDA shall apply. Finally, when electronic copies are disposed of or destroyed according to the RDA, the same notification and authorization policy applies to them as it does the paper record.

#### 11. **Disposition & Retention Schedule**

The RDA or retention schedule that may be found at [http://www.archives.state.al.us/officials/rdas/universities\\_aug05.pdf](http://www.archives.state.al.us/officials/rdas/universities_aug05.pdf) is organized by agency function as follows:

- a. Admitting/Expelling Students (Recruitment Records)
- b. Conveying Knowledge (Curriculum/Library/Archives)
- c. Advising and Assisting Students (Publications, Athletics, Student Life)
- d. Enforcing Laws
- e. Evaluating Performance (Grade related records and lists)
- f. Researching (Research Project & Policy Records)
- g. Administering Internal Operations and Resources