



University of California

**Business and Finance Bulletin  
RMP-2  
Records retention and disposition:  
principles, processes, and guidelines**

Office of the Associate Vice President -- Information  
Resources and Communications

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## I. References

- Business and Finance Bulletin [RMP-1, “University Records Management Program”](#)
- Business and Finance Bulletin [RMP-4, “Vital Records Protection”](#)
- Business and Finance Bulletin [RMP-7, “Privacy of and Access to Information Responsibilities”](#)
- [Records Disposition Schedules Manual](#)

## II. Definitions

**Active Record:** A record that is necessary for the conduct of current business.

**Administrative Record:** See **Record**.

**Disposition:** The systematic treatment of records that have reached the end of their retention period. Options for disposition are: transfer to University Archives, and disposal.

**Inactive Record:** A record that is no longer necessary for the conduct of current business, but has not yet reached the end of its retention period.

**Long-term Retention:** A retention period of more than five years (including permanent retention).

**Non-record:** Material that is of immediate value only. Non-records are not maintained as university administrative records, are not assigned retention periods, and are not subject to records disposition guidelines. (See IV.B for [examples](#).)

**Record**<sup>1</sup>: Any writing, regardless of physical form or characteristics, containing information relating to the conduct of the public’s business prepared, owned, used, or retained by an operating unit or employee of the university. “Writing” means handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combination thereof, and any record thereby created, regardless of the manner in which the record has been stored.

The term “**administrative record**” is used to describe any record that documents or contains valuable information related to the organization, functions, policies, decisions, procedures, operations, or other business activities of the university.

**Record Custodian:** The individual with responsibility for maintenance of a repository of records.

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<sup>1</sup> Definition is modeled on language contained in the [California Public Records Act](#) (see Ca. Govt. Code § 6252(e) and (f)).

**Record Proprietor:** The individual with management responsibility for the records associated with a university administrative function.

**Records Lifecycle:** The three stages through which records are to be managed:

(1) creation or receipt; (2) use; and (3) disposition.

**Records Management Coordinator:** The individual at each campus and at the Office of the President responsible for the development, coordination, implementation, and management of the Records Management Program at that location.

**Records Retention:** The maintenance of records for prescribed time periods. See also: Long-term Retention and Short-term Retention.

**Short-term Retention:** A retention period of five years or less.

**UC Records Retention Schedules:** A universitywide document that lists and governs the retention period and the disposition of identified records that are common across the University of California (UC) system.

**University Archivist:** The individual at each campus, appointed by the University Librarian, who is responsible for the preservation of campus administrative records that deal with the history of the university.

## III. Introduction

### A. Purpose of this bulletin

Management of the disposition of administrative records is a component of the University's Records Management Program, as described in [Business and Finance Bulletin RMP-1](#). The purpose of this bulletin is to establish, in the context of the records lifecycle, the universitywide principles and processes for records disposition, and to outline the roles and responsibilities associated with this component of the Program.

### B. Audience

This bulletin is for use by anyone in the university community who makes decisions about administrative records. Material provided in the Appendices may be helpful to anyone in the institution who creates or receives records of any type.

### C. Scope

Except as superseded by state or federal laws and regulations, and university contracts or grants, the disposition program applies to all [administrative records](#), regardless of their medium, held by the

- University of California campuses and the Office of the President,
- University of California medical centers, and
- Department of Energy laboratories managed by the University of California.

The Program does not apply<sup>2</sup> to

- Administrative records held by the Principal Officers of The Regents,<sup>3</sup>
- Teaching and research records (e.g., library materials, faculty research and teaching materials, student examinations),
- Records pertaining to individual patient care (medical records), or
- Non-records.

## IV. Disposition program principles

Through the disposition program, the university strives to retain records long enough to satisfy internal and external requirements, but not so long as to incur unnecessary costs or burdens. The aim is to accomplish these goals by:

- Identifying important administrative records that are common universitywide, and encouraging their consistent management throughout the UC system,
- Helping to distinguish administrative records to be managed under the program from other records and non-records,
- Centralizing decision-making as practicable, while allowing for local decisions and practices to address location-specific situations,
- Providing tools, in the form of guidelines and the *UC Records Retention Schedules*<sup>4</sup> (“Schedules”), to facilitate adherence to these principles throughout the university community.

### A. Identification of administrative records of importance

Administrative records determined to have value in one or more of the following areas should be managed (e.g., assigned retention periods) under either a local or the universitywide disposition program:

#### 1. Business operations

The record is needed to perform current or future activities in support of the administrative functions for which an operational unit is responsible.

#### 2. Evidence and accountability

The record contains evidence of legally enforceable rights or obligations of the university; or is needed to fulfill statutory and regulatory requirements; or pertains to financial transactions and is needed for audit purposes.

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<sup>2</sup> Such materials may, however, be subject to external requirements under state and federal regulations and university contracts.

<sup>3</sup> General Counsel, Treasurer, and Secretary of The Regents.

<sup>4</sup> In this Bulletin, “Schedules” refers to the universitywide UC Records Retention Schedules, with lowercase “schedules” referring to retention schedules generally or local campus schedules.

### **3. Preservation of university history**

The record has enduring historical value to the university or to the research community because it reflects historical events or documents the history or development of the university and its offices.

#### **B. Identification of non-records**

Non-records are defined as materials that are of immediate value only. Non-records may share some characteristics with administrative records; however, they are distinguished from administrative records by their transitory usefulness. Some examples of non-records are: envelopes, routing slips, data entry- and work-sheets, rough drafts, multiple copies of publications, blank forms, unofficial (“informational” or “courtesy”) copies of administrative records, and notes and audio recordings that have been transcribed.

Non-records are not managed under the university’s records management program; they should be disposed of once their period of immediate usefulness has passed. If non-records are not handled in accordance with their temporary nature, the unnecessary use of university resources may occur. If not disposed of, non-records may be subject to disclosure (e.g., under the California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding).

#### **C. Coordination with University Archives**

In 1964, the university established a University Archives program to preserve within the general library at each campus administrative records associated with the history of the university. Coordination with the archives function is key to the success of the disposition program, and occurs on multiple levels:

- between the University Records Management Committee and the University of California Archivists Council (UCAC);
- between campus Records Coordinators and the University Archivist at their respective locations; and
- between holders of historical records requiring preservation and their local University Archives.

#### **D. Records lifecycle management**

At the heart of the records management program is the concept that records pass through three stages – Creation (or receipt), Use, and Disposition – and must be managed through each. A graphical representation of the lifecycle is presented [below](#).

Judgments about the eventual disposition of records are best made at the beginning of the lifecycle. Success of any disposition program depends on an early awareness of which records are to be managed,<sup>5</sup> and the need to manage them through all three lifecycle stages.

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<sup>5</sup> See III.C Scope; IV.A Identification of records of importance; and IV.B Identification of non-records.

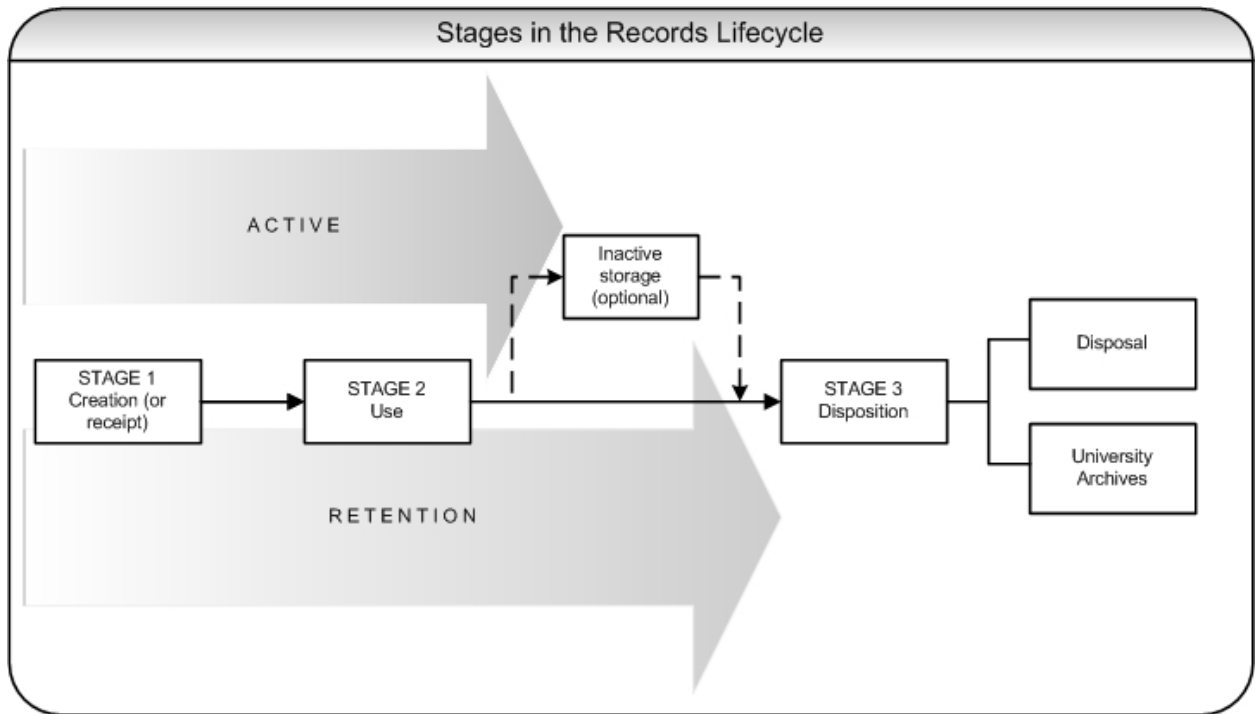


FIGURE 1

### 1. Creation or receipt

Records are identified as administrative records to be managed at Stage 1, when they are created or received.<sup>5</sup>

### 2. Use

Stage 2 lasts as long as the record is in use and concludes at the end of the record's retention period.

Records may be placed in inactive storage if they are still within their retention period, but the frequency of their use has diminished. As a general guideline, a record still under retention that is accessed at least once a year or more frequently can be considered "active," while one accessed less frequently can be considered "inactive." Local practices and/or space considerations may override this guideline. Decisions on storage methods and location are local decisions made by Record Proprietors (sometimes in conjunction with Record Custodians).<sup>6</sup>

<sup>6</sup> See Appendix A for general guidance on storage.

### 3. Disposition

Stage 3, Disposition, occurs at the end of the assigned retention period. There are two options for disposition: (1) records may be disposed of; or (2) with prior arrangement (or as mandated in the Schedules), records may be transferred to University Archives.

Decisions regarding the method of disposal are local decisions made by Record Proprietors (sometimes in conjunction with Record Custodians),<sup>7</sup> taking into account any legal considerations.<sup>8</sup> Decisions concerning the transfer of records to University Archives also are made locally. In addition, certain records that are common universitywide have been identified by the University Archivists as core records with historical value to each campus. For these records, archival instructions are published in the *UC Records Retention Schedules* and must be followed. These are the only disposition instructions included in the universitywide Schedules.

## V. Processes

### A. Retention schedules

The *UC Records Retention Schedules* govern the retention of records universitywide. Current versions of the Schedules are published online and are to be accessible to any university employee with record-keeping responsibilities. The Schedules are to be followed by all university units.

To facilitate consistent treatment across the University of California, administrative records that serve the same business purpose are organized by purpose or function. For example, rather than list all the specific records from every university location that are used to track the physical location of equipment, all such records that perform the function are grouped together under a heading (“Tracking Physical Location of Equipment”) that is generally applicable. A sample section from the Schedules is included with this Bulletin as [Appendix D](#).

The Schedules apply to the authoritative copy of the record controlled by the Record Proprietor, not to non-record extra copies that may be created for convenience or informational purposes.

#### 1. Contents

Within broad functional categories, records are described by the business purpose they serve. Each descriptive group contains the following elements:

- a. A description of the function or business purpose of the records,
- b. A retention period, stated in years (or a fraction thereof), or as “permanent,”
- c. Retention period details, such as “following completion of project” or “after superseded,” as appropriate,

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<sup>7</sup> See Appendix B for general guidance on record disposal.

<sup>8</sup> See V.C.3. Cautions regarding disposal.

- d. An indicator if some records in the group might be subject to longer retention pursuant to federal contract and grant requirements,
- e. An indicator if the record group requires special treatment accorded to the university's vital records,<sup>9</sup> and
- f. Archival instructions, if any.

Record location and university office in charge of the records are no longer tracked on a universitywide basis, although such information may appear in legacy documents under the designation "office of record."

## **2. Creation of new Schedules**

The local Records Management Coordinator, in consultation with operational managers, may propose additions and revisions to the Schedules to the University Records Management Committee as needed.

The leader of a universitywide interest group may propose revisions or additions related to his or her particular functional area to the Chair of the University Records Management Committee.

Proposals to add to or revise existing Schedules should include recommendations for each relevant Schedule element (see V.A.1.a-f), and in addition:

- a. Justification for the proposed addition or revision (e.g., why the record needs to be managed: a description of its value to the institution, per IV.A.1-3), and
- b. A description of the coordination that has taken place (who has approved, endorsed, and/or been consulted about the proposed retention period).

## **3. Local schedules**

University locations may develop and publish local schedules that supplement the universitywide Schedules. Local schedules may connect specific information such as local record names, filing locations, and other location-specific practices, to the universitywide record groups.

When local operational considerations so require, local schedules may specify a retention period that is longer, but not less than, the universitywide Schedules.

## **B. Records not in the Schedules**

Many records exist throughout the university that are outside the scope of this policy. The local Records Management Coordinator is the primary contact for advice on whether a given record is omitted from the Schedules due to scope or some other reason (e.g., differing interpretation, or new record for which no appropriate model exists).

If the Records Management Coordinator determines that a record should be proposed for addition to the universitywide Schedules or local schedules (if any), during the time such

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<sup>9</sup> See Business and Finance Bulletin [RMP-4, "Vital Records Protection."](#)

proposal is pending the retention period of the record should be assumed to be the longer of the proposed retention period, or four years.

## C. Disposition procedures

### 1. Determining the disposition date

Retention periods are counted from the date of creation of the record, unless other instructions (e.g., “3 years from termination,” “1 month after last modified”) are noted.<sup>10</sup> Disposition would normally occur following the end of the month or year that marks the end of the retention period: thus, disposition of a record for which the retention period ends on May 15 would take place as soon after May 31 as practicable.

The manner in which records are organized – in a set, for example – may prevent the carrying out of disposition for some records until the end of the retention period is reached for all records in the set. Operational practices also may influence the carrying out of disposition: for instance, when the record function is tied closely to the university fiscal year (July 1 – June 30), disposition may be accomplished at the end of the fiscal, rather than the calendar year. Practices that require variation from the presumptive disposition date, and which are not noted in the universitywide or local schedules, should be documented by the responsible Record Proprietor.

### 2. Timely disposal

Failure to carry out timely disposal can lead to the unnecessary expenditure of resources to store, maintain, search for, and produce records. In addition, when records may legitimately be disposed of at the end of their retention period, but disposal is not carried out, such records remain subject to possible future requests under statute or legal proceedings (e.g., California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding).

### 3. Cautions regarding disposal

- a) Record disposal must take into account the nature of the record contents. When called for – for example, in the case of confidential documents – record contents are to be rendered irretrievable by shredding or other means. Disposal and destruction techniques and considerations are discussed in [Appendix B](#): Recommendations for Record Disposal.
- b) Even if records have reached or exceeded the end of their retention period, there may be conditions under which their disposal *must* be deferred.
  1. External requirements under state and federal laws or regulations and university contracts or grants override university retention periods, where applicable.
  2. Records that have been requested pursuant to statute or legal proceedings (e.g., California Public Records Act, Information Practices Act, or discovery of evidence in a legal proceeding) must not be disposed of while the matter is ongoing.

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<sup>10</sup> See also V.A.1 b and c.

3. Records that have not yet been requested, but are deemed likely to be requested pursuant to statute or legal proceedings, including potential litigation, must not be disposed of without prior consultation with legal counsel.
  4. Records related to any ongoing investigation must not be disposed of without prior consultation with legal counsel.
- c) The intentional disposal of records to avoid their disclosure may be punishable by disciplinary action or civil or criminal penalties.

#### **4. University Archives**

##### a) Archival instructions

The Schedules contain archival instructions for some record groups. *In all cases where an archival instruction appears, Record Proprietors and others in possession of such records must contact the University Archivist prior to physically transferring any records.*

Depending upon the wording of the instruction, acceptance of the records at disposition time by the University Archivist is either optional or required. The three types of archival instructions are:

##### 1. Subject to University Archives review

Records designated in the Schedules as “subject to University Archives review” must be offered to the University Archivist as instructed. It is the University Archivist’s option to accept and retain such records, to accept and retain a portion of the records, or not to accept the records.

##### 2. Transfer to University Archives at the end of retention

Records with a specified retention period other than “permanent” are to be transferred to University Archives at the end of the stated period. The University Archivist is required to accept the records.

##### 3. Transfer of “permanent” retention records to University Archives after a specified period

A portion of the records with a retention period of “permanent” are indicated for transfer to University Archives. Usually, the time at which records are to be transferred is indicated in the instruction (e.g., “transfer to Archives after 10 years”). The University Archivist is required to accept such records. According to archival practice, permanent administrative records will be preserved at University Archives in their original order, if the order is evidence of administrative practice.

##### b) Access to records transferred to University Archives

Limitations on access to the records by archives users, consistent with state and federal law, may be negotiated between the Record Proprietor and the University Archivist. Records transferred to University Archives remain the property of the university and are administrative records, not general library materials. Records become part of the archive’s holdings upon their transfer.

c) Permanent retention records with no archival instruction

Record Proprietors may contact University Archivists for advice on the continuing maintenance of permanent retention records that are not pre-designated for transfer to University Archives. The topics of maintenance and preservation are discussed in Appendices A and C, respectively.

d) Archival interest in records not in the Schedules

University Archivists also may be contacted for appraisal of the archival value of records omitted from the Schedules due to scope or for other reasons.

## **VI. Roles and responsibilities**

### **A. General**

All employees who handle administrative records are responsible for applying the guidelines contained in this Bulletin.

### **B. Universitywide**

#### **1. University Records Management Committee**

The University Records Management Committee is responsible for the development and ongoing maintenance of universitywide Schedules.

Through their Committee membership, ex-officio members of the University Records Management Committee are responsible for review of new Schedules from the points of view of their particular areas of expertise: Office of the General Counsel of The Regents, for legal criteria; University of California Archivists Council for historical criteria; University Auditor for audit implications; and Office of the Vice President—Financial Management for fiscal accountability.

#### **2. Chair, University Records Management Committee**

The Chair of the Records Management Committee publishes and maintains Universitywide Records Retention Schedules. The Chair also maintains copies of Schedules that have been superseded to provide a historical record of the schedules that were in force at a given period in time.

#### **3. Universitywide interest groups**

It is the responsibility of the leadership of universitywide groups (e.g., Controllers, Human Resources Managers, Registrars, HIPAA Privacy Officers) to bring to the attention of the University Records Management Committee changes and developments in their particular functional areas that may have records retention impacts.

Recommendations for proposed new or revised retention schedules may be submitted to the Committee as outlined in V.A.2.

## **C. Local**

### **1. Records Management Coordinator**

The local Records Management Coordinator creates, publishes, and maintains local Records Retention Schedules, if any. The Coordinator also maintains copies of schedules that have been superseded to provide a historical record of local schedules that were in force at a given period in time.

The Coordinator may propose records for inclusion in universitywide Schedules; on these and other proposals, it is the responsibility of the Coordinator to convey the interests of his or her campus to the University Records Management Committee. The Coordinator is the local resource for retention questions.

### **2. University Archivist**

The University Archivist at each location is responsible for preserving records that reflect historical events or document university history, which have value to the university or to the research community. This includes the permanent maintenance of records designated in the universitywide Schedules as permanent retention, with the instruction to “transfer to University Archives,” as detailed in V.C.4.a).

Collectively, through representation on the University Records Management Committee, the University Archivists review proposed new or revised Schedules and indicate which records should be offered to local University Archives for review or transferred to University Archives.

Locally, the University Archivist collaborates with the Records Management Coordinator on any location-specific archival matters, including participating in review of local schedules, if any. The University Archivist also consults with local Record Proprietors on the preservation of long-term retention records.

### **3. Record Proprietor**

The Record Proprietor interprets and applies universitywide and local retention schedules to records in his or her charge and ensures that these requirements are conveyed to the Record Custodian. The Proprietor documents variations from the standard calculation of the disposition date that are not otherwise noted in either universitywide or local schedules. The Proprietor makes decisions, consistent with these guidelines and university policy, on storage and disposal methods, sometimes in conjunction with the Custodian. The Proprietor collaborates with the Records Management Coordinator and/or University Archivist regarding the application of universitywide and local archival instructions and contacts the Archivist prior to transfer of any records to University Archives.

### **4. Information Practices Coordinator**

The Information Practices Coordinator advises on privacy and access-to-information matters that may arise in connection with the storage and disposal of records.

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## Appendix A: Recommendations for Record Maintenance and Storage

*“Maintenance” refers to the activities surrounding the organization, retrieval, and transfer of records.*

The following tips are for anyone in the university who makes decisions about how to organize or store records. If you use a computer, or fill out forms, or send or receive mail, you probably are creating or receiving records.

Not all tips will be applicable to every situation. These lists of recommendations were developed by information professionals in order to encourage the broader consideration of record maintenance and storage principles, and to point readers to additional resources for help with their particular circumstances.

### *General*

- Organize and store university records in a way that you, *or someone else, if necessary*, can access them most efficiently.
- Match the effort and cost to maintain and store a record with the record’s value to the unit and the university.
- For records that need to be retained for some period of time, keep in mind the record lifecycle (IV.D). When such records are created or received, try to plan for their eventual disposition.
- In the case of electronic records, in addition to the ongoing maintenance of the records themselves, the potential longevity of the software that will be needed to access the records in the future also must be taken into account.
- Consider appropriate alternatives to maintenance and storage: is the record reliably available from another office? Is the record available online – and guaranteed to continue to be available online for as long as you will need to refer to it?
- If the records contain personally identifiable or other sensitive information, maintenance and storage methods must include measures to protect against unauthorized access. These topics are discussed in [RMP-8, “Legal Requirements on Privacy of and Access to Information”](#) and [IS-3, “Information Security.”](#)
- Vital records represent less than one percent of the university’s records, but their loss or premature destruction can be disproportionately costly to the institution. Exceptional maintenance and storage measures are required for vital records. Please reference [RMP-4, “Vital Records Protection”](#) for information about vital records identification and responsibilities.
- Remember: keeping records longer than necessary or required is a waste of time, space, and other university resources.

Click to jump to additional topics:

<a href="#">Access</a>	<a href="#">Media</a>	<a href="#">Records as Evidence</a>
<a href="#">Conversion</a>	<a href="#">Metadata</a>	<a href="#">Retrieval</a>
<a href="#">File Formats</a>	<a href="#">Microfilm</a>	<a href="#">Scanning</a>
<a href="#">Filing</a>	<a href="#">Migration</a>	<a href="#">Storage</a>
<a href="#">Full-text searching</a>	<a href="#">Organization</a>	<a href="#">Storage with Outside Parties</a>
<a href="#">Keywords</a>	<a href="#">Record Formats</a>	<a href="#">Transfer</a>

### ***Organization***

- Add descriptive labels to records or groups of records. Use the most obvious, standard filing schemes so that anyone could retrieve the records if necessary. Examples of simple schemes that can be applied - alone or in combination - to both paper and electronic files, include:
  - Alphabetical - by personal name; by business name
  - By date – group by day, month, or year; in order by date received; by disposition date
  - By subject or topic
- If records are grouped by disposition date, an entire file/disk/carton can be processed without additional searching for those records that have reached the end of retention. If no further review of the records is needed before they are disposed, you can indicate that somewhere on the records or inventory and avoid review later on.
- Keywords, summaries, and other descriptive data about records (“metadata”) can be particularly useful if specific individual records will need to be retrieved from a larger repository, or if there is a need to distinguish some records from many similar ones. Office productivity software (e.g., Microsoft Office®) usually provides a way to add such metadata or “properties” to word processing files, spreadsheets, and other types of documents.
- Separate records requiring destruction (see [Appendix B](#)) from those for which routine disposal will suffice.
- Mark records as “copies” if they are not the authoritative versions, to avoid possible confusion and facilitate record disposition at a later date.
- Mark “drafts” as such so that they can easily be disposed of in favor of final versions.
- [ARMA](#) (the Association of Records Managers and Administrators) is a source for more information about organizing files and records.

### ***Retrieval***

- Maintain records with an eye to how they will need to be retrieved: will it be important to reproduce the original look and feel – physical appearance, formatting characteristics? Is the context or organization of the records important or just the content?
- Consider whether records will be part of a larger repository, and thus more difficult to individually locate and retrieve; such records may require keywords (described in [Organization](#), above) or a more granular filing scheme (e.g., by *year* and *month*, rather than just by *year*).
- Keep in mind how quickly the record will need to be retrieved. Will there be time to review hundreds or thousands of potential matches? Or will it be necessary to zero in on the precise record in a very short timeframe? Such considerations will influence the choice of access method.
- For unstructured electronic records (aggregations of records without common qualities), full-text searching can be applied. Note, however, that this approach tends to increase costs to store and maintain the records, and that searches can result in the retrieval of many irrelevant records that are time-consuming to review.

### ***Storage***

- Storage methods should be aligned with your business requirements: how quickly do you need to be able to get to the record? How often is it likely to be accessed over the period during which it will be stored? Will it need to be accessed by multiple people who may be geographically dispersed?
- Take into account your business requirements when deciding where to physically locate the records, whether on- or off-site; on-, near-, or off-line; or at a remote location.
- Use labels and/or inventories to track contents of storage containers (files, folders, disks, directories and sub-directories, cartons, drawers, etc.). Devise tracking schemes that will be obvious to others, in case someone other than you needs to retrieve records.
- Protective measures should be commensurate with the consequences of possible loss of the records. For example, vital records typically require greater protection than non-vital records.
- Sensitivity of the record contents may demand exceptional measures to ensure against tampering or unauthorized access. (See [Appendix B](#) for more information on record sensitivity.)
- Records that have *evidentiary value* (see RMP-2 IV.A.2) may require measures that sustain the records' integrity or authenticity. Examples of such measures include logging all access to the records, and the storage of electronic records in a “read-only” state to avoid inadvertent or deliberate changes to the record. (See [IS-3](#) for more on Information Security.)

- Maintain records in a format, medium, and, if electronic, in a file format that has a high probability of enduring as long as records need to be kept. Technology change is especially an issue for long-term retention (anything over five years, including permanent retention). (See also [Appendix C](#) on preservation for more on this topic.)

#### *Storage with outside parties*

- Justifications for storage with outside vendors can include: lack of on-site space; need for redundancy (e.g., a second set of records stored at a separate location as part of a disaster recovery plan); ability of a vendor to deliver additional services or better service than can be provided in-house.
- If storage is contracted to non-University facilities, standards of the facility/organization should meet or exceed the University's own capabilities with regard to security, environmental protections, employee training, etc. Any such requirements should be stipulated in the contract.
- Information about which factors to assess when selecting off-site storage can be obtained from [PRISM](#), the non-profit trade association of storage vendors. [Conservation Online \(CoOL\)](#) also provides a link to an [article](#)<sup>11</sup> with advice on this topic.

#### *Transfer*

Records may be transferred in order to ensure their integrity across changes in technology that occur or are expected to occur. In some circumstances, migration, conversion, or both may be appropriate.

- *Migration* refers to the transfer of materials or systems of records to succeeding versions of software/systems (e.g., Adobe Acrobat® 5.0 to 6.0); or, more broadly, the transfer from one technology generation to subsequent generations (e.g., from client-server architecture to “thin client” or Web technology).
- *Conversion* refers to the transfer of material to a different format or medium. Examples include:
  - Scanning of paper to microfilm or paper/microfilm to digital images
  - Re-keying of printed text to machine-readable format
  - Transferring of records from proprietary formats/systems to more independent, open ones
  - Converting read-write format to read-only
- Increased ability to access the records is another potential benefit of records transfer. For example, records or systems of records previously maintained in stand-alone fashion can be made network-accessible through conversion. Such projects should be undertaken in collaboration with experts from records and information technology and other stakeholders.

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<sup>11</sup> Moore, Pat. “Vital Records Protection Issues.” *Abbey Newsletter*. July 1997 (v.21:8).

- *Transfer* also refers to the physical transfer of historically valuable records (and the associated authority for such records) to University Archives. This is the University's formal process for ensuring the records' ongoing, long-term availability, discussed in depth in V.C.4.
- No records should be transferred to University Archives without first contacting the University Archivist.

***Where to get more advice on your specific situation:***

[Records Management Coordinators](#) – contact information for campus and UCOP coordinators

[University Archivists](#) – contact information for campus archivists

**Systems/technical staff** – technical support staff should be able to advise you – or point you to help – about maintenance and storage of records used by you/your workgroup. For information about a specific system (e.g., the payroll system, your online calendar), ask to be put in touch with the person who functions as [Record Proprietor](#) for that system.

**Campus Controllers and Risk Managers** – at some locations, and depending upon the type of records, these individuals may be involved in planning for record maintenance, backups, and disaster recovery. Please check your local directory for contact information.

**Outside Organizations:**

- [Association for Information and Image Management – AIIM](#)
- [Association of Records Managers and Administrators – ARMA](#)
- [Professional Records & Information Services Management – PRISM International](#)

## Appendix B: Recommendations for Record Disposal

The following tips are for anyone in the university who has occasion to dispose of records. If you use a computer, or fill out forms, or send or receive mail, you probably are creating records. Eventually those records will need to be disposed of or destroyed.

### *General advice*

Disposal is made easier if it has been considered at the beginning of the records lifecycle (see IV.D). Techniques that can help to expedite disposal include:

1. pre-identification of records that can be disposed of without additional review;
2. grouping together of records that can be disposed of on the same date; and
3. prompt disposal of any non-record materials as soon as they have served their purpose, so as to reduce clutter and streamline the eventual disposal of retained records.

See [Appendix A](#) for more information about the organization and storage of records.

### *Records requiring destruction (rather than simple disposal)*

Methods of disposal need to take into account the subject matter or *contents* of the records. Records containing information that, if accessed or used inappropriately, could adversely affect the university, its partners, or the public, must not be disposed of casually. Instead, such records *must be destroyed* so that they cannot practicably be read or reconstructed. In some cases, records requiring destruction may be intermingled with disposable records to such an extent that it is more cost-effective to destroy an entire group of records, rather than picking out just those for which destruction is required.

Many categories of records whose contents require destruction, rather than simple disposal, have been defined in various university policies, using varying terminology, as exemplified in the following list.

- **Academic review records** as described in APM-160-20-b (1) and (2)  
<http://www.ucop.edu/acadadv/acadpers/apm/apm-160.pdf>
- Records containing **confidential information** as defined in section VII.B.1, or **personal information** as defined in section VII.B.4, of Business and Finance Bulletin [RMP-8, “Legal Requirements on Privacy of and Access to Information”](#)
- Attorney-client privileged records, records of outside parties containing trade secrets or proprietary information, and other types of records that would be **exempt from disclosure under the California Public Records Act**, as described in section VI.C. of Business and Finance Bulletin [RMP-8, “Legal Requirements on Privacy of and Access to Information”](#)
- **Protected health information** as described in  
<http://www.universityofcalifornia.edu/hipaa/uccompliance.html>
- **Restricted sensitivity electronic records** as described in Business and Finance Bulletin IS-3, “Information Security,” Sec. IV.A.(p. 8)  
<http://www.ucop.edu/ucophome/policies/bfb/is3.pdf>

- **Student personally identifiable information** as defined in the UC Policies Applying to Campus Activities, Organizations, and Students, Section 130.240  
<http://www.ucop.edu/ucophome/coordrev/ucpolicies/aos/uc1302.html>

The preceding list is meant to be illustrative, not complete. For assistance determining the disposal requirements of specific records, contact the Information Practices Coordinator at your location (see [More Information](#)).

### ***Destruction methods***

- Records stored on paper: *shred*
  - Many locations throughout the university have contracts with shredding services. If you don't know how shredding is handled at your location, ask your department/unit business officer.
- Records stored on microfilm: *destroy the microfilm or -fiche by cutting up, shredding, or otherwise ensuring it cannot be read or reconstructed*
- Records stored digitally: *don't just "erase" or "delete"*
  - In general, electronic files and records are not entirely deleted unless they are written over; there are specialized software tools for this task.
  - Special measures must be taken when computers are discarded to ensure that the information on hard drives is not recoverable. Recognize that machines may be redeployed or even resold outside the university after they leave your work unit.
  - A process called "degaussing" can be used to erase magnetic media that are not going to be reused or resold.
  - Some shredders can destroy diskettes and cd's as well as paper.

Services and procedures vary depending on university location. For more information about the thorough destruction of electronic records in your work unit, start by contacting whoever is responsible for your computer desktop support.

### ***Destruction by outside parties***

When contracting with an outside entity for record destruction, the contract should specify destruction measures that are consistent with these guidelines and should provide for some form of monitoring the entity for compliance with agreed-upon practices and procedures.

### ***Disposal methods***

- Where no records requiring destruction are potentially involved, standard disposal methods are sufficient.
  - However, university computer hard drives should be assumed to contain some records that would require destruction rather than simple disposal; information

on disks that are to be discarded must be rendered unrecoverable per [Destruction Methods: Records stored digitally](#) (above).

- Recycling of paper records – including the remnants of shredding – is encouraged.
- Special waste handling may be required for media other than paper.
- University locations have different recycling and disposal practices. Your department/unit business officer should be able to point you to services available at your location.

***More information:***

Business and Finance Bulletin [BUS-38, “Disposal of Excess Material”](#)

[Information Practices Coordinators](#) (for assistance identifying record contents requiring destruction)

[Records Management Coordinators](#)

## Appendix C: Record Preservation Considerations

Preservation encompasses the activities which prolong the usable life of...records. Preservation activities are designed to minimize the physical and chemical deterioration of records and to prevent the loss of informational content.

“What is Preservation?”

U.S. National Archives and Records Administration (NARA)

[http://www.archives.gov/preservation/about\\_preservation.html](http://www.archives.gov/preservation/about_preservation.html)

This Appendix is an overview of record preservation: potential problems, recommended preservation actions, campus contacts, and preservation resources.

Preservation is primarily an issue for two types of records determined to be valuable to the university: vital<sup>12</sup> records, and records with long-term<sup>13</sup> retention periods. In the case of the latter, preservation procedures help protect the record from needless deterioration. Preservation actions can also apply to the technology associated with a record, to ensure continued availability of the record and/or of its contents.

NOTE: Technical specifications for different file types, file media, machine-readable files, etc., are specialized topics and are beyond the scope of these preservation guidelines.

### *General advice*

Best practices recommend that preservation measures be anticipated and applied early in the record lifecycle - ideally, when records are created or received. However, in current practice, preservation measures tend to be applied when records become inactive, at which point appropriate preservation measures are more costly and complex to implement.

As with maintenance and storage measures ([Appendix A](#)), preservation techniques should be commensurate with the record's value to the university. The costs of record loss should be balanced against the ongoing costs of preventing the loss (preservation).

### *Preservation Considerations*

The following general issues are worth consideration for their relevance to your particular vital or long-term record situation. Suggested preservation actions should be considered in the context of business and other requirements. Specific advice on these topics can be obtained by contacting the Resources at the end of this Appendix.

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<sup>12</sup> Vital records are discussed in depth in RMP-4, “Vital Records Protection.” Less than one percent of the university's administrative records are classified as vital.

<sup>13</sup> 23% of assigned administrative retention periods are for long-term retention (i.e., more than five years, including permanent retention records).

Preservation Objective	Preservation Action(s) to Consider
Ensure record availability by preventing or delaying deterioration due to <i>environmental conditions</i> (e.g., heating-ventilation-air conditioning [HVAC] systems; molds; pests; dust; light; air pollutants).	Identify and eliminate environmental hazards that are potentially destructive to records.
	Routinely inspect record storage conditions.
	Utilize (or transfer records to) storage containers that withstand or slow destruction by environmental conditions.
Ensure <i>record medium</i> (e.g., paper, photographs, tape, disk, microfilm) is stable, preventing deterioration.	Transfer record information from unstable or deteriorating) media to stable media.
	Routinely monitor records for signs of deterioration.
Ensure ongoing record availability (or shorten time of unavailability) despite <i>natural disasters</i> or other <i>unforeseen events</i> (e.g., flooding, fire, chemical exposures, earthquakes).	Mitigate damage to records.
	For high-risk records or records whose loss would be most costly, store backups at separate location.
	Institute a disaster recovery plan. Identify essential record department functions and prioritize recovery of those records.
Recover original record content if records are destroyed.	If original records are destroyed, recover record content and functionality by means of reproductions.
Prevent loss of authentic record or record content as a result of theft, tampering, etc.	Establish or tighten existing security measures (e.g., password protection and logging for electronic records, physical locks and other controls for tangible collections).
	Utilize read-only formats to guard against unintentional or intentional changes to record contents.
Ensure continued access to vital and long-term electronic records.	At time of record creation, select open, non-proprietary file format and medium if possible; later, consider migration to newer or more viable operating system/application software.
	Retain obsolete (or to-be obsolete) hardware along with records.
	Utilize software to emulate obsolete operating system/application software.

### ***Special considerations – electronic records***

If original organization, context, and look-and-feel of a record are not essential, consider reformatting the record to another medium. Migration to different software may also be appropriate.

Backups of electronic records made for emergency restoration of entire systems generally should not be considered “preservation” measures, as they may not be suited to locating and replicating individual records. Contextual characteristics or the organization of the records may be lost if records are restored from such sources.

Keep in mind that paper, though limited in its distribution and prone to deterioration, is frequently the most open, technology-neutral medium, followed by microfilm.

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### ***Where to go for help - Campus Resources***

#### **Preservation Officer**

- Contact your campus library or find the contact at your location:  
<http://libraries.universityofcalifornia.edu/cdc/pag/members.html>

#### **Records Coordinator**

- See the list of contacts at your campus or UCOP:  
<http://www.ucop.edu/irc/recman/>

#### **Systems/technical Staff**

- Contact technical support staff attached to your department or unit with questions about preservation of electronic records used or created there. Other resources may be available from campus-wide Information Technology organizations, which are linked from: <http://www.ucop.edu/irc/itorgs.html> (scroll to the list of “Campus Organizations”)

#### **University Archivist**

- Contact your campus library or see the list at:  
<http://libraries.universityofcalifornia.edu/cdc/ucac/index.html>
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### ***Where to go for help – Urgent Requests/Disaster Assistance related to record preservation***

- California Preservation Program emergency line: 888-905-7737 (within California)
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## ***Where to go for help - Web Resources***

### **General Preservation Information**

- California Preservation Clearinghouse (CPC) of the California Preservation Program  
<http://cpc.stanford.edu/> - see particularly “Preservation Management”
- U.S. National Archives and Records Administration (NARA) – Preservation  
<http://www.archives.gov/preservation/>
- University of California Libraries Preservation Advisory Group (PAG)  
<http://libraries.universityofcalifornia.edu/cdc/pag/> - see “Links of Interest”

### **Disaster Planning and Response**

- California Preservation Clearinghouse – Emergency Preparedness and Response  
<http://cpc.stanford.edu/disasters/>
- Conservation Online (CoOL), a project of the Preservation Department of the Stanford University Libraries – Disaster Preparedness and Response  
<http://palimpsest.stanford.edu/bytopic/disasters/>
- SOLINET (a not-for-profit library cooperative) - Preservation and Access Program  
[http://www.solinet.net/preservation/preservation\\_home.cfm](http://www.solinet.net/preservation/preservation_home.cfm)  
(See particularly “Disaster Mitigation and Recovery Resources” -  
[http://www.solinet.net/preservation/preservation\\_templ.cfm?doc\\_id=71](http://www.solinet.net/preservation/preservation_templ.cfm?doc_id=71))

### **Off-site Storage**

- Refer to RMP-2 [Appendix A – Recommendations for Record Maintenance and Storage](#)

### **Vital Records**

- Moore, Pat. [“Vital Records Protection Issues.”](#) *Abbey Newsletter*. July 1997 (v.21:8).
- UC Business and Finance Bulletin [RMP-4, “Vital Records Protection.”](#)

## Appendix D: Sample retention schedule: purchasing records

Retention periods for administrative records in the purchasing area are outlined in this section. These policies apply equally to paper and electronic records.

Records listed in this section serve the business purpose of documenting all stages of the process of purchasing goods or services for University of California use. In addition to the purchase order or agreement, this section includes other records that inform, support, or justify the various stages of the purchasing process. Also included are records that assist in finding the right source and price and in determining inventory re-orders, and in making claims for items not received. This section also includes records documenting the physical movement of goods to and through the university.

This section does not include purchase of goods for public resale, e.g., through auxiliary business enterprises such as bookstores. See the section on Accounting for accounts payable records generated by the purchasing process. Employee travel reimbursement records are covered in the Accounting section.

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### ***Purchasing Record Groups - Table of Contents***

1. [Purchase of Supplies & Services \(other than Independent Contractors' services\)](#)
2. [Purchase of Services - Independent Contractors](#)
3. [Strategic Sourcing](#)
4. [Receiving](#)
5. [Storehouse \(and other Internal Distribution\)](#)
6. [Supplies Inventory](#)
7. [Inventory of Drugs & Controlled Substances](#)
8. [Serials/Standing Orders](#)
9. [Vendor Data](#)

#### ***1. Purchase of Supplies & Services (other than Independent Contractors' services)***

Records in this group serve the function of documenting the details of purchases of services and goods including inventorial equipment by the University. The group includes but is not limited to: purchase requisitions, requests, and agreements; purchase orders (including blanket PO's); change orders, exceptions and cancellations; and other related documentation and correspondence. Also included: documentation relating to

employees' authority to purchase. Please see [Group 8](#) within Purchasing for "standing" orders.

**Retain 5 years**

## ***2. Purchase of Services - Independent Contractors***

This group contains records of Personal/Professional Services Contracts between the University and independent contractors for professional, specialized, educational, creative, or custodial services. This group may include but is not limited to: contracts with terms and conditions; addenda and exhibits; selection and justification statements; input forms authorized signature sheets; contractor selection statements; certificates of compliance with tax laws; statements as to availability of local service; statements as to whether minority services available; contract change orders; bids and agreements; performance bonds; instructions to bidders; advertisements for bids; working papers; expense claim records; and related documentation and correspondence. This group does not include research-related contracts: please refer to Section 13 - Research.

**Retain 5 years**

## ***3. Strategic Sourcing (formerly Planned Purchasing) Program***

Records in this group pertain to Strategic Sourcing and include: agreements, terms & conditions, amendments and supplements product descriptions, and contact information (internal and vendor). Also included are any request for, and approvals of, exceptions to strategic sourcing agreements. Records of orders executed under the Strategic Sourcing program should follow guidelines for purchase orders as with any other purchase (see [Group 1](#)).

**Retain 5 years after expiration of agreement**

## ***4. Receiving Records***

This group documents the receipt of equipment, supplies, and other items and services from vendors and includes: packing slips; shipping and container lists; bills of lading, and documentation of claims for non-receipt and/or damage.

**Retain 5 years**

## ***5. Storehouse (and other Internal Distribution) Supporting Records***

Records in this group support the resale or redistribution of supplies, consumables, etc. within the University. The group includes but is not limited to: catalogs, listings, price lists, and sales data.

**Retain 3 years**

## ***6. Supplies Inventory***

This group documents the quantity and value of supply items. Inventory held by Storehouse as well as departments/units is included. Records may include but are not limited to: activity reports; cost - and value reports; departmental supplies inventory forms; supply lists and ledgers; and other related reports, documentation, and correspondence.

**Retain 5 years**

**7. *Inventory of Drugs & Controlled Substances***

Records in this group document the purchase and inventory of drugs and controlled substances held by units for clinical, instructional, and research uses. These records include but are not limited to: certificates/licenses documenting investigators' authority to purchase; daily inventories; and detailed inventory logs.

**Retain 3 years after expiration of certificate**

**8. *Serials/Standing Orders***

These records document the receipt and payment history for serial or standing orders. Typically the libraries do the purchasing and such orders are distinguished from other purchase orders because of the open-ended activity. Records may include but are not limited to: purchase orders; receiving records; periodical check-in cards; shelf list cards; payment cards; cancellations; and related documentation.

**Retain 5 years after cancelled or superseded**

**9. *Vendor Data***

This group includes records used for quick reference of vendor data. Records may include but are not limited to: reports containing vendor numbers, payee names, invoice numbers, and amounts; extra copies of purchase orders or requisitions; packing slips; promotional and advertising materials; product specification sheets; address and contact information; and related documentation and correspondence.

**Retain 5 years**

# Appendix E: Decision tree: Do I need to keep this?

Roll your mouse over the question marks for more information

