University Records—Retention and Disposition

Records Management

Departments are responsible for retaining and disposing of University records in accordance with retention periods approved by the Washington State Records Committee. (RCW 40.14)

Procedures, Records, and Forms

Procedures, Records, and Forms (PRF) coordinates the records management program and assists departments with records retention and disposition. The director of PRF is the WSU records officer.

Archives

The University archivist serves as a resource to identify records that may be suitable for the WSU archives collection (BPPM 90.02).

State Records Committee

The state records committee reviews and approves University records retention schedules. The committee includes a representative from the State Auditor's Office, the Office of Financial Management, the State Archivist, and the Office of the Attorney General.

Definition of Records

All records and copies of records made or received in the conduct of WSU business, regardless of physical form or characteristics, are considered public records for purposes of retention and disposition. (RCW 40.14.010)

Retention Schedule

An approved records retention schedule specifies retention periods for public records and authorizes destruction or release to the University archives. Records series titles held commonly by multiple departments are included in the All-University Records Retention Schedule. Records series titles held by one department only are included on a department schedule. Department schedules are available to anyone with a WSU NID.

All-University Schedule

The retention periods for most University records are included on the All-University Records Retention Schedule. Listed retention periods supersede retention periods listed on all previously issued schedules for the indicated record series titles.
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All-University Schedule (cont.)

If, after review of departmental records, departmental personnel find that all records are included in the All-University Records Retention Schedule, no further action is required by the department. The department retains and disposes of records in conformance with the All-University schedule.

The All-University Records Retention Schedule is maintained on the PRF website and consists of the following tables sorted by business function:

- Administrative—Executive Level Records (Dean and above)
- Administrative—General Office Operations
- Accounting/Fiscal Records
- Information Services Records
- Legal Files
- Library Services Records
- Mail Services Records
- Payroll and Personnel Records
- Property Management Records
- Public Affairs and Public Disclosure Records
- Purchasing Records
- Records Management Files
- Research and Sponsored Projects Records
- Safety Records
- Security Records
- Student Records
- Travel Records

Department Schedule

If the department has unique records series titles not included on the All-University schedule, the department's records coordinator is to contact the WSU records officer. The records officer, or designee, prepares a draft Department Records Retention Schedule that includes the unique records series titles and recommended retention periods. The records officer, or designee, routes the draft schedule to the department for review.

After departmental review and approval, the records officer, or designee, submits the final records retention schedule to the State records committee for approval.

To request a new or revised department retention schedule, contact PRF; telephone 509-335-2005; mail code 1225; e-mail prf.forms@wsu.edu.
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Schedule Description

The following description includes terms used on the All-University schedule and individual department retention schedules. The exhibit in Figure 1 is of a department schedule.

![Records Retention Schedule](image)

**Figure 1**

Office Name

The **Office Name** is the department or unit name.

Records Coordinator

The department chair designates a **Records Coordinator** for the department. This employee coordinates the preparation of the Records Retention Schedule, reviews the schedule biennially and supervises retention and disposition of office records. See **Biennial Review Process**.

Records Series Title and Description

The **Records Series Title--Function/Purpose** or **Title/Description** statement names and describes the records in a records series.
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Status

The checkboxes in the Status field indicate whether or not the records series is:

- New to the departmental schedule
- Revised
- Discontinued
- Transferred to another University department

If no checkbox is selected, no change is made to the records series.

OPR or OFM

OPR

OPR (Official Public Records) include:

- Records required by state or federal law.
- Records of legal transactions, e.g., receipts, contracts.
- Records used in fiscal/financial audits, e.g., Effort Certification.

OFM

OFM (Office Files and Memoranda) include all other records including copies of Official Public Records. Most records are OFM.

Location of Other Copies

This column identifies the location of other copies of the records series. An asterisk (*) identifies the office holding the official record for the University for that records series. This column may be blank.

The term "Department" indicates that the records series is held in multiple University department locations.

Retention and Disposition Action

The Retention and Disposition Action is the minimum period that the records must be kept after a specified cutoff event and the action to be taken at the end of this period.

The disposition portion of the statement indicates whether the records are to be destroyed at the end of the retention period or sent to University Archives for appraisal and selective retention. (See Archival Records.)
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Example

If the retention and disposition action for a records series is "Retain for 2 years after end of fiscal year, then destroy," the records must be collected through the end of the current fiscal year and retained for at least two more fiscal years before destruction.

Secondary or Reference Copy

Some records series specify retention periods for secondary or reference copies. Note: If no retention of secondary/reference copies is specified for a records series, secondary or reference copies are held until the administrative purpose is served and then destroyed.

Disposition Authority Number

The state records committee assigns a Disposition Authority Number (DAN) when a records series is approved for retention and disposition.

Remarks

Archival Records

If the University archivist determines that a records series may have long-term historical value, "Archival (appraisal required)" is indicated in the Remarks column. Records coordinators arrange to transfer such records to University Archives after the retention period has elapsed. Contact Manuscripts, Archives, and Special Collections (MASC) for assistance; telephone 509-335-6691 (see also BPPM 90.02).

Essential Records

University departments are responsible for identifying and protecting essential records needed during an emergency and for the reestablishment of normal operations afterwards. If a record series is identified by a department as being required for the department to resume operations after a disaster or emergency, "Essential" is indicated in this column. If lost or destroyed, re-creation of essential records can be both costly and time consuming, if not impossible. Refer to BPPM 90.15 for the complete essential records policy.

Biennial Review Process

Each University department is responsible for reviewing the departmental records retention schedule at least once every two years to ensure that the schedule is complete and current (RCW 40.14.040). To facilitate this review process, PRF biennially notifies the department of the review requirement and provides a Retention Schedule Review form.
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Biennial Review Process (cont.)

The department records coordinator reviews the schedule with appropriate departmental officials, then returns the completed and signed review form to PRF. If changes are required, the records officer, or designee, prepares a draft schedule as indicated under Department Schedule.

Retention Factors

The department is responsible for securely maintaining the records for the retention period indicated on the retention schedule.

Safety/Confidentiality

The department's responsibility includes ensuring the physical safety of the records, as well as ensuring that confidential records are protected from inappropriate or illegal release. See BPPM 90.05 for more information about release of confidential records.

Electronic Records

Electronic records must be retained in electronic format and remain usable, searchable, retrievable, and authentic for the designated retention period. Printing and retaining a hard copy is not a substitute for retention of the electronic version. (WAC 434-662-040)

See also BPPM 90.03 regarding retention of electronic communications.

Scanned/Imaged Records

Departments may scan paper records and then retain only the imaged copies only if the imaging system (e.g., scanner) produces images that meet the state imaging quality minimum requirements. See BPPM 90.21.

Note: If the applicable records series indicates "Archival" in the Remarks column and the imaged copies meet the state's quality minimum requirements, the department must:

• Send the paper records and a copy of the images to University Archives after scanning; then
• Destroy the imaged records at the end of the retention period.

See Archival Records.
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Permanent Retention

Few records are worth preserving forever. The Records Committee rarely approves retaining a records series permanently.

Superseding the Retention Schedule

If an audit, legal action, or public records request is in progress, related records may not be disposed of even when authorized by the retention schedule. See BPPM 30.12 and 30.14 regarding audits; BPPM 90.05 regarding public records requests; and BPPM 90.12 regarding litigation holds.

Inactive Records Storage

After records are no longer regularly accessed, departments should move the records from active files in file cabinets or computers to inactive storage locations.

For inactive storage, paper records may be placed in archive boxes. Archive boxes are acid-free, double-walled storage boxes with built-in handles, and may be obtained from most office supply vendors.

Digital records may be moved to offline storage.

An inactive storage location must be secure from unauthorized access, as well as provide protection from physical damage, e.g., from vandalism, water, fire.

Space

WSU Pullman

At WSU Pullman, if acceptable space is not available to store inactive records for the required retention period, download and complete a Request for Allocation of Space to request storage space through Facilities Services.

Non-Pullman Campuses

At the following campus locations, route requests for inactive records storage space to the campus facilities services unit:

- WSU Spokane: 509-358-7994
- WSU Tri-Cities: 509-372-7253
- WSU Vancouver: 360-546-9000
- WSU Everett: 425-405-1600
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Space Unavailable at Campus Location

If records storage space is unavailable at the campus, center, or station, non-Pullman departments may be able to use storage space at the WSU Pullman campus, if available. See contact information above.

If no other WSU space is available, the State Records Center, managed by the state archivist, provides low-cost, secure records storage. Departments may contact PRF for assistance with this option.

Records Disposition

An approved records schedule provides authorization to archive or to dispose of University records. (RCW 40.14.060)

After records have been stored for the complete retention period, the records coordinator either sends the records to University Archives or disposes of the records. If the records are to be disposed of, the records coordinator either destroys or recycles the records.

Recycling

Many records may be recycled in accordance with University recycling procedures (BPPM 80.80).

Confidential Records

If the records are confidential, departments are responsible for ensuring that the records are protected from unauthorized or illegal disclosure by reducing them to an illegible condition. (WAC 434-640-020)

Definition

Confidential records include records that are exempt from public disclosure (see BPPM 90.05, 90.06, and 90.07). Examples of confidential records include student files and patient files.

Paper Records Destruction

Generally, paper records are destroyed by shredding. Departments may shred records with a departmentally-owned shredder, hire a private shredding company, or have the records shredded by WSU Waste Management.
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Facilities Services—Operations Shredder

The Waste Management division of Facilities Services—Operations at WSU Pullman operates a shredder and accepts confidential paper records for shredding. Contact Waste Management for information regarding use of the shredder and costs to departments; telephone 509-335-4530; e-mail waste.management@wsu.edu.

Private Shredding Company

Departments may obtain the services of a private shredding company. Departmental personnel pay for the service by procurement card (BPPM 70.08) or by issuing a Purchase Order (BPPM 70.16).

Nonpaper Records

Like paper records, confidential records in nonpaper media, e.g., microfilm, CDs, DVDs, hard drives, must be made illegible prior to disposal.

Such media must be physically destroyed or digital records must be securely deleted with a suitable software program.

Deletion of Electronic Files

Secure deletion techniques are necessary for complete data destruction. Prior to disposal, data residing on digital media must be disposed of in a manner that renders the data unrecoverable. Data destruction methods must meet or exceed Department of Defense (DoD) 5220.22-M three-pass levels or an equivalent process. Contact the campus or area Information Technology Services (ITS) for further assistance.

Surplus Computers

See BPPM 20.76 for procedures for removing data from hard drives of computers to be sent to Surplus Stores or sold to another University department.