

# COLUMBUS STATE UNIVERSITY

Policy Name:	University Records Management Policy and Procedures
Policy Owner:	Dean of Libraries
Responsible University Office:	Columbus State University Libraries
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Related Policies:	BOR 6.24

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## **I. Purpose and Scope of Policy**

### **A. Purpose**

The purpose of this document is to:

1. Establish consistent records retention practices in compliance with all federal and state laws, including the Georgia Records Act (O.C.G.A. 50-18-90 et seq.) as well as comply with standards developed by the Board of Regents (BOR);
2. Meet requirements of external entities, such as accrediting bodies;
3. Establish an efficient University-wide records management system for identifying, retrieving, and maintaining records;
4. Dispose of records efficiently and at the appropriate time;
5. Preserve records to document university history and ensure continuity of operations; and
6. Protect vital records and information in the event of a disaster.

### **B. Scope**

This document applies to all records created by Columbus State University (CSU), regardless of format, whether in paper, electronic, CD-ROM, microform, or other medium.

## C. Applicability

All employees and non-employee representatives, including student assistants, volunteers, and members of University Foundation, who conduct business for or on behalf of Columbus State University (CSU) are responsible for managing University records in accordance with this policy.

## II. Definitions

- **Active record:** A record referenced often to conduct current departmental business.
- **Archival Record:** A permanent record which is inactive and no longer needs to be housed in the creating office. These records are of enduring value and document the history and the development of the organization.
- **Creator:** The person, department, or unit that originates, receives, or assembles records
- **Destruction Date:** The date which marks the end of the legally required retention period for non-permanent records and the time when records should be destroyed
- **Disposition:** Defines the final state in a records life cycle. This includes final destruction of documents or transfer either inactive storage or to the University Archives.
- **Inactive records:** Records no longer required by their creating unit to carry on current business and therefore ready for final disposition in accordance with the University Records Retention Schedule.
- **IRMO:** Institution Records Management Officer. The authority and responsibility for overseeing each Institution's compliance with its legal obligations regarding records management are vested in the Institution head and are delegated to the Institution Records Management Officer.
- **Permanent Record:** A record which has a permanent or lasting administrative, legal, fiscal, research or historical value and therefore must be retained and preserved indefinitely.
- **Records Retention Schedule:** Instructions for what to do with public records (based on administrative need and legal requirements) from their creation, through active and inactive use, to their destruction or retirement. The schedule provides a minimum period of time that a specific type of record must be preserved.
- **Retention Period:** The period of time during which records must be kept before they are either destroyed or transferred to the Archives.

## III. Policy

Columbus State University will manage its records in accordance with Board of Regents policy as outlined in Section 6.24 of the BOR policy manual and as outlined by the University System of Georgia (USG) Records Retention Schedule.

All records management practices are to be in accordance with this policy and its supporting procedures outlined throughout this document and as directed by CSU Library and Archives, which is responsible for university records management.

## **IV. Procedures**

### **A. Determining Record Retention and Disposition**

#### **Record Retention**

Each individual or department is responsible for managing the records they create, including identifying retention periods. The retention period is the minimum period of time that a record must be kept.

Retention periods are listed in the Records Retention Schedule developed by the USG. This Schedule will be used to determine the minimum retention period for university records and is available at:

- [http://www.usg.edu/records\\_management/schedules](http://www.usg.edu/records_management/schedules)
- [https://www.usg.edu/records\\_management/schedules/all\\_schedules](https://www.usg.edu/records_management/schedules/all_schedules)

Please note that the schedule is not intended to be comprehensive. If a record is not included in the retention schedule contact CSU Libraries/Archives for assistance.

In exceptional circumstances, some records may need to be kept longer than their normal retention period, such as any records subject to litigation.

#### **Record Disposition**

Disposition is the nature of the record, such as active vs. inactive and temporary vs. permanent.

Active records are those that are frequently referenced by the creator and should be kept within the creating office. Inactive records are those no longer needed for the function of day-to-day operations and should be transferred to the CSU Library/Archives.

Inactive records may be designated as either Non-permanent (temporary retention) or Permanent.

- Non-Permanent records with a designated destruction date will be transferred to the Library for processing and then transferred to the USG State Records Center for maintenance and destruction as appropriate.
- Inactive records designated by the Schedule as Permanent must be transferred to CSU Archives and Special Collection for long term preservation as part of the historical record.

Some documents are not considered official university records. Non-records are those not created by the University that do not show evidence of university operation. Examples of non-records include:

- Preliminary drafts, worksheets, memoranda, and informal notes that do not represent significant steps in the preparation of records
- Unsolicited announcements, invitations, junk mail, conference programs, etc...
- Duplicates/Extra copies
- Blank forms, unused stationary, and other generic office supplies

## **Destruction of Records**

It is a misdemeanor to destroy public records before their authorized destruction date. All record destruction must be authorized and documented to prove it was done legally and in accordance with all laws, policies, and procedures. Therefore, destruction of records should not be done by individuals or departments and should not be done using standard office shredders which do not meet record destruction standards. Instead, records will be transferred to the USG Records Center which provides systematic destruction to ensure records are destroyed appropriately and securely. Documents are pulverized into non-reconstructable fragments to ensure confidential information is non-recoverable.

## **B. Transferring Records - Preparation and Packing**

### **Non-Permanent Records**

#### *Review*

All records must be reviewed and labeled by the creating office. Boxes must be labeled using the template at:

- [http://archives.columbusstate.edu/universityrecords/RM\\_Box\\_Label.docx](http://archives.columbusstate.edu/universityrecords/RM_Box_Label.docx)

#### *Packing*

- To comply with state standards, records must be packed in Paige Miracle Box #15 (Product #: MB-15 at: <https://www.paigecompany.com/product-catalog/3-miracle-box.html>)
- Records within the boxes should be in folders. No hanging files or three ring binders should be included. These interfere with the eventual destruction process.
- Boxes with sensitive or confidential information must be sealed (taped closed) for secure transfer across campus.

#### *Transfer*

Once records are packed, submit an eQuest to Records Management. In the eQuest description please specify if you are transferring Permanent or Non-Permanent and the number of boxes.

A date will be scheduled with Campus Services for pick-up and delivery. Failure to notify the Library via eQuest prior to sending or delivering boxes could result in records being returned to your department.

## **Permanent Records**

### *Review*

Inactive Records determined to have permanent retention must be transferred to the University Archives and Special Collections.

### *Packing*

Non-standard boxes are acceptable for delivery to the Archives. Archival staff will replace them with acid free boxes intended for long term preservation.

Keep files in the original order they existed during their active life. This helps document how the office functioned and shows evidence of university operation. In this case, binders, hanging files, and other nonstandard folders are acceptable.

### *Transfer*

Once records are ready to transfer, submit an eQuest to Records Management and designate your request as Permanent Records. A date will be scheduled with Campus Services for pick-up and delivery. Failure to notify the Library via eQuest prior to sending or delivering boxes could result in records being returned to your department.

## **C. Access and Use**

Records transferred to the USG Records Center will be accessible via several methods. The Records Center can send scanned copies upon request within 24 hours. Original Records can also be returned to the creating office if needed.

Permanent archival records held in Archives and Special Collections are available for retrieval during the Archives' normal operating hours.

### **Requests for Access from External Individuals**

As a state agency, CSU is subject to the Georgia Open Records Act (ORA). O.C.G.A. § 50-18-70 (2012), meaning most CSU records, with a few exceptions, are public information. Requests for records most commonly come from news media representatives, but can be made by any individual or organization. Requests will be handled by the Open Records/FOIA Officer. The University must make an initial response to any request for information within three business days, so it is essential that all requests be forwarded immediately. For more information on this see Section F.

## **D. Electronic Records**

All electronic records, including email and social media, created or received by University employees and representatives in the course of official business is subject to state records laws and the retention requirements of the Board of Regents. Although these records are transmitted digitally and easy to delete, it does not prevent them from being official records. Regardless of the medium, these information resources still represent evidence of official transactions; hence constitute official records and should be managed consistent with the requisite policies and procedures.

## **E. Reformatting of Records**

Reformatting generally involves replacing paper records with microfilm or electronic images. No reformatting project should take place without prior consultation with the IRMO and completion of a thorough cost-benefit analysis of the project. Records designated as permanent shall not be destroyed, even if duplicated, without contacting the Georgia Archives.

## **F. Confidential and Sensitive Information**

Some records may contain sensitive or confidential information, such as student grades, medical records, and personally identifiable information, e.g. employee social security numbers. Laws protecting these records include:

- Family Educational Rights and Privacy Act of 1974 (FERPA – 20 U.S.C. 1232g), which protects access to student records;
- Gramm-Leach-Bliley Act, which protects access to financial records; and Open Records Act, which contains a number of exemptions barring certain information and records from disclosure.

It is imperative that these records are protected from unauthorized access. For more information or for assistance in determining if records hold sensitive or confidential information contact the Chief Information Security Officer or General Counsel.

## **G. Open Records Requests**

As an instrumentality of the state of Georgia, Columbus State University is subject to the requirements of the Georgia Open Records Act (ORA). O.C.G.A. § 50-18-70 (2012). Although exceptions apply, ORA mandates open access of public records upon request and, when applicable, for a fee. Requests for records, regardless of whether they refer to the Open Records Act or whether the request is in writing,

should be sent to or communicated immediately to the Office of Legal Affairs, Ethics, and Compliance. Additional information regarding open records requests may be found [here](#).

## **V. Related Board of Regents' Policies**

### [6.24 Records Retention](#)

## **VI. Links**

- <https://archives.columbusstate.edu/university-records>
- <https://legalaffairs.columbusstate.edu/open-records-act-request.php>
- <https://www.usg.edu/policymanual/section6/C2717>
- [http://www.usg.edu/records\\_management/schedules](http://www.usg.edu/records_management/schedules)