

Records Retention Policy

1. Purpose

The University of Arizona Global Campus ("UAGC" or "University") Records (as defined below) must be managed in a consistent, systematic, and secure manner to ensure their authenticity, reliability, integrity, confidentiality, and availability. This Records Retention Policy provides the requirements for managing UAGC Records throughout their lifecycle, including archiving or secure destruction and, together with any related procedures or administrative guidelines, and the UAGC Records Retention Schedule, forms the basis for a UAGC Records Management Program which complies with applicable federal and state laws and regulations as well as any retention obligations expressly agreed to by UAGC and its' affiliates. The definition of a record goes beyond only paper-based materials. Records shall include any type of electronic (digital) file or data, machine-readable outputs, emails, still photographs, motion pictures, audio recordings, charts, maps, drawings, plans, video recordings, micrographics, digitized magnetic tapes, or any other physical or digital record types. This policy applies to all university-owned records regardless of their origin or storage location.

2. Scope

This Policy applies to the board of directors and all employees, including exempt and non-exempt staff, full time and associate faculty as well as third parties working for and providing services or products to or on behalf of UAGC such as adjunct faculty, contractors, consultants, and temporary employees. Every director, employee and third party working on behalf of UAGC who creates, sends, or receives electronic or paper Records is responsible for making sure Records are properly maintained.

3. Definitions

- **Convenience Record(s):** A Record that is required only for a limited time to ensure the completion of a routine action or the preparation of a subsequent Record such as correspondence that requires no administrative action, policy decision, or special handling. Convenience Records are not used as the basis of an administrative action or decision. Examples include duplicates or copies of Official Business Records, personal notes, preliminary working drafts, magazines, industry publications or documents where multiple copies exist other than the document's creator/owner, casual correspondence, and calendar entries. Convenience Records are generally exempt from adhering to standard records retention policies. When in doubt about correctly classifying an informational item as a non-record (for retention purposes), treat that item as an official record until the matter is clarified.
- **Legacy Record(s):** (a) An old, obsolete paper Record stored at a University location or at offsite storage, which is no longer needed or used for legitimate business purposes; (b) a Record that has reached the end of its required period of retention; or (c) a Record in electronic form stored in a format or application that can no longer be accessed because of outdated technology.
- **Official Business Record(s):** A Record, usually an original, that the University has determined should be retained for business or legal reasons for the period of time indicated on the Records Retention Schedule or as otherwise indicated in this Policy.
- **Record(s):** A collection of information, in any form, created or received by the University. Also used to refer to units of related data fields (i.e., groups of data fields that can be accessed by a program and that contain the complete set of information on particular items).

- **Records Retention Schedule:** A schedule which documents and classifies UAGC Official Business Records, the Business Record Owner, and the length of time that a type of Record should be retained prior to destruction or archiving.

4. Roles and Responsibilities

The following positions are critical to ensuring the accountability, transparency, integrity, and compliance of UAGC Records Management Program:

- Employees are responsible for knowing and complying with this policy. This includes all aspects of records management throughout the lifecycle of the Record, as outlined in the following section.
- A Business Record Owner is the UAGC business unit or individual employee who is responsible for ensuring the integrity of an Official Business Record during its lifecycle.
- A Business Unit Head is responsible for oversight of the records management program within their operational area and for the management of the Records associated with their specific business area.
- Records Management Coordinators are individuals appointed by the Business Unit Head to be responsible for the application of the Records Management Program for a specific business unit. The Records Management Coordinator serves as the single point of contact for all Records Management inquiries related to the specific business unit's Records and is a subject matter expert and champion for the Records Management Program within the business unit.
- The University Records Manager is responsible for oversight, control, and administration of the Records Management Program. The University Records Manager is supported by the business unit Records Management Coordinators in the implementation of the Program, ongoing Records Management activities and ensuring controls are in place so that Records are maintained, classified and destroyed in accordance with all applicable laws, regulations, and the retention schedule.

5. Policy Statements

Record Lifecycle: Records must be managed throughout their lifecycle, regardless of format, storage location or office of record.

Create and Classify. When a Record is created, it should be assigned a Record category on the Retention Schedule to properly identify what type of Record it is.

Use and Manage. Employees should access and use Records only as required in connection with their UAGC employment and manage them in a manner appropriate for preservation and protection of the content.

Store and Retrieve. Records must be maintained in appropriate UAGC information systems and at appropriate locations. Records must be searchable and retrievable. Appropriate locations include but are not limited to those maintained by vendors under service agreements with UAGC addressing records management and storage requirements.

Records Management Coordinators will maintain an inventory of the categories and location of Records in each department.

Review and Dispose. Records Management Coordinators will review the Department inventory of Records at least once annually to determine whether the applicable Retention Schedule period has expired and, if so, determine the appropriate means of disposal or destruction.

Records Retention Schedule: The University Records Retention Schedule establishes categories of Records, and provides examples of Records from each category and the length of time that the Records from each category must be maintained (retention period) by UAGC and third parties providing services on behalf of UAGC. The categories of Records are distinguished based on business function.

The content or the intended use of the Record determines the retention period, the length of time the Record must be maintained, not the media or format. Records (paper, electronic, structured, and unstructured) must be retained in compliance with the retention periods in the Records Retention Schedule and must not be destroyed before the retention period expires. Changes to the Schedule must be approved by the Office of the General Counsel, to ensure those changes follow applicable statutory and regulatory requirements.

Records Disposition and Destruction: Once a Record reaches the end of the applicable scheduled retention period, it may be destroyed unless it is needed for compliance with an audit or subject to a Legal Hold Order. Employees and third parties working on behalf of the University must seek approval for Records destruction from the applicable Record owner, or the Business Unit head. All employees including third parties working on behalf of UAGC are responsible for following the Records Retention Schedule and ensuring Records have met their retention period and that no applicable Legal Hold Order exists before the Records are destroyed.

The methods used to destroy Record types (e.g., paper, electronic files, microfiche, CDs, and other data storage devices) must ensure the confidentiality of the information. Records pending destruction must be protected in accordance with the policy until they can be destroyed. A Destruction Log or Certificate of Destruction (for third-party vendors) must be retained by the business unit as evidence of the destruction of official business Records.

Convenience Records must be maintained only so long as reasonably necessary (unless subject to a Legal Hold Order or audit).

6. Exceptions

Legal Hold Orders: A Legal Hold Order is a directive from the Office of the General Counsel specifying certain Records that should not be destroyed until the Legal Hold Order is rescinded by Office of the General Counsel. Records subject to Legal Hold Orders must continue to be stored by the University even if those Records have expired or will expire during the time the Legal Hold Order goes into effect.

Office of the General Counsel is responsible for notifying Records Management Coordinators, other employees and third parties such as contractors of actual or potential litigation, investigation, or other circumstances that may require the preservation of evidence or prevent a Record from being destroyed. Office of the General Counsel shall also notify Records Management Coordinators of any Legal Hold Order applicable to their business unit. Upon Office of the General Counsel notification, employees and third parties working on behalf of UAGC shall not destroy relevant Records or information. Individuals who have received a Legal Hold Order should contact Office of the General Counsel immediately with any questions regarding preservation or destruction of Records in relation to the Legal Hold Order or legal proceeding.

Records in any format of permanent or historical value: Records include, but are not limited to board meeting minutes, photographs, audio and video recordings, organization charts, annual reports, program development, UAGC related newsletters / journals / magazines / newspapers (faculty, student, alumni), and major initiative information (e.g. creation of related entities, university reorganization).

Physical Records Converted to Electronic Records: Unless prohibited by law, paper Records may be transferred to other durable media that does not permit alterations, deletions or additions to the Record or metadata about the Record. Quality control review must be performed to ensure that the integrity and authenticity of all information contained in the original Record has been maintained in a durable medium and that the transferred Record is of equal quality to the original Record. Upon meeting the quality control review standards, the original paper Record may be destroyed in accordance with established archiving requirements, unless destruction of the paper record is prohibited by law.

Electronic Records: Records created, generated, or stored by electronic means, including electronic communications received and copies of electronic communications sent (e.g., instant messages, email messages, SMS text messages, blogs, social media, etc.), must be preserved consistent with the Records Retention Schedule.

The electronic storage media used to retain electronic Records must:

1. Preserve the Records exclusively in a non-rewriteable, non-erasable format where required by law, UAGC policy or other regulatory body.
2. Verify the quality and accuracy of the storage media recording process.
3. Ensure that the storage is properly indexed and can be searched for the purposes of electronic discovery.
4. Ensure that the Records can be produced as soon as reasonably possible to facilitate a legal or regulatory request.
5. Have in place an audit system providing for accountability regarding inputting of Records required to be maintained and preserved.

7. Training

Everyone working at UAGC should understand their responsibilities for the appropriate creation, use, retention, and destruction of Records. Training and communication about the Records Management Program emphasizes the importance of protecting UAGC Records and that risks and consequences exist when this responsibility is ignored. Therefore, the University Records Manager shall provide training and other information to support the Records Management Program from time to time.

8. Transferred or Terminated Staff and Faculty

Individuals transferring positions within UAGC or leaving UAGC employment must leave all Records for their successors. The manager/supervisor of the departing individual is responsible for the appropriate handling and disposition of the Records.

9. Monitoring, Oversight, and Enforcement

Periodic reviews of the Records Management Program should examine UAGC performance and adherence to the Records Management policy and be documented to evidence the review, the results, and identify any processes that are found to be ineffective.

The University Records Manager shall review this Policy every two years and will recommend updates as needed based on changes in regulations, new information system implementations, and business requirements.

Any employee and third-party working on behalf of UAGC who violates this Policy may be denied access to Records and may be subject to disciplinary action, up to and including termination of employment or contract.

Any exceptions to this policy must be approved by the University Records Manager and the General Counsel.

10. Related Policies & References

Any policies developed or supporting documents should be referenced here and linked out here.