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Document Area Vice President of Compliance and Ethics
Applicability Saint Louis University Campus Wide

Record Management and Retention Policy



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1.0 Reason for Policy

The purpose of this policy is to establish a records management governance structure for Saint Louis University that:

- Meets business needs;
- Preserves Saint Louis University's history;
- Fulfills all federal, state, accreditation, and other legal and institutional requirements;
- Maintains privacy and security of institutional and constituent information;

- Retains access to records throughout required retention period;
- Maintains a consistent, orderly, and effective process of records review and transfer;
- More efficiently uses resources, to minimize the costs associated with retention of records; and
- Governs the appropriate destruction of outdated and unnecessary records.

2.0 Policy Statement

This policy governs the management, handling, and destruction of all university electronic and physical records.

Materials that are generally not considered university records within this policy include, but are not limited to university library and museum material made or acquired and preserved solely for research, reference or exhibition purposes, and personal papers neither related to the official function of an office nor created in pursuance of university activities. Other materials not under the jurisdiction of this policy will be determined by the University Record Retention Committee.

University Record Retention Committee

The University Record Retention Committee (URRC) makes policy recommendations and decisions based on guidance from this policy. The URRRC convenes at least annually to discuss the university's record retention rules and general matters that may inform university practices. The URRRC creates rules for record retention including, but not limited to:

- Determination if materials should fall under the rules of this policy;
- Updates to record retention schedule; and
- Authorization of unit personnel to manage operational unit records under this policy.

Membership

Members of the URRRC will include representatives from the Office of Compliance and Ethics, Office of General Counsel, Facilities, Risk Management, ITS/Information Security, Office of the Provost, University Libraries, Office of the University Registrar, Division of Student Development, and Research Administration; other members of the committee will be selected by the Responsible Official of this policy. The chair of this committee will be named by this policy's Responsible Official.

Record Storage and Labeling

Operational Units must adhere to the standards set by the URRRC for storage and labeling of records under its control and handle all records under their control in accordance with the requirements of this policy. Operational Units are responsible for ensuring that university records under their control are not destroyed, discarded, sold, or otherwise disseminated without proper authorization.

Storage

There must be physical and environmental protections in place to preserve the confidentiality, integrity, and access to the records.

The Operational Unit shall notify the appropriate official if there is any unnecessary or excessive risk to the records or if any records have been known to be lost or compromised. Examples of causes of loss of records include, but are not limited to, water damage, fire, theft, computer server failure, or time-caused deterioration.

Labeling of Stored Records

The minimum standards for labeling require a clear, accessible, legible label that contains at least the following information:

- The operational unit responsible for the records including contact person;
- Beginning and ending dates of the contents;
- Date of destruction review along with the following notice:
"Record Retention Schedules may have changed since this label was created; consult the current Retention Schedule for guidance before taking action.";
- Sequential numbers of a set (e.g., 1 of 4, 2 of 4, etc.);
- Any special tagging (e.g., "Attorney-Client Privileged", "Regulatory Report", "Permanent", or "Preserved"); and
- Labeling must be clear and unambiguous.

It is the responsibility of each operational unit to update the labels of stored records to reflect the current retention period and the destruction review date based on updates to the record retention schedule and document contact person.

Retention

The records retention schedule ([link](#)) lists different types of records and the length of time those records must be retained. Any questions regarding the retention period for a specific document or class of documents not included in the record retention schedule should be sent to the URRC.

Retention Decision

The record retention schedule ([link](#)) will be the guide for decisions on retention or destruction of materials. The schedule lists types of records and the retention period for each. The operational unit is responsible for consulting the URRC or Office of the General Counsel if there is any uncertainty or confusion about the appropriate application of the record retention schedule.

If a record contains an inseparable combination of record types with different retention periods (such as a report containing two categories of data), then the longest retention period will apply. In using the record retention schedule, if there are inconsistencies in the retention periods, the longer period will apply.

During the retention decision process, consideration should be given to handling of preserved records to

ensure they are not destroyed. It is the responsibility of the operational unit to appropriately label the materials to be preserved.

Inactive Record Retention

If it has been determined that active records are no longer needed for business reasons, but the applicable retention period has not yet expired, the records may be transferred to long term storage.

Preserved Record Handling

Operational units are responsible for designating records as preserved records and notifying other operational units of their responsibility to retain any necessary records and when an action has been resolved and records are no longer considered preserved records. Types of actions that may require record preservation include, but are not limited to, an audit, investigation, litigation, claim, or a legal or judicial action.

The coordinating office is responsible for notification of specific requirements regarding which records are to be preserved. Additional requirements may include, but are not limited, to preserving original documents rather than copies, and increased security safeguards. A modification in either content or format to a preserved record beyond what is specified is prohibited.

When designating records as preserved, the coordinating office must ensure that the designation is unique, unambiguous, and does not cause a breach in the confidentiality of the action or the response. In the event that a record is designated as a preserved record for two separate actions, the resolution of one action must not result in the premature destruction of the record for the purposes of the other action.

Review

Review Frequency

Each Operational Unit (other than the University Archives) shall perform a review of all university records under its control at least once per calendar year.

Reporting and Documentation

The URRC shall set a standard for reporting and documentation of reviews by category of record. At a minimum, the operational unit is required to maintain a review log describing the date(s), location(s), and personnel who performed the review.

Destruction

Operational Units must destroy expired, non-preserved records within a reasonable period of time after the retention period has elapsed. It is prohibited to destroy any record that is active, archived, or preserved. Once a preserved record is no longer designated as a preserved record, it is to be handled according to its status and age.

All expired non-preserved records that contain confidential information must be destroyed in an approved manner that renders them unreadable and irretrievable. The URRC will maintain guidance for

destruction, such as using the university-contracted shredding service for paper records and following ITS procedures for destruction of electronic records. Operational units must verify that every format of the record (e.g. media, print) is destroyed when the original is scheduled for destruction.

Each operational unit shall maintain a destruction log and retain the destruction log as a permanent record unless the record retention schedule specifies that it is a temporary record with a schedule for expiration. The operational unit shall provide reports and information regarding record status, activity logs, and other information as appropriate to the URRC when requested.

Transfer

Operational Units may transfer records to another operating unit of the university. When records are transferred to another operating unit of the university, the transferring unit contact listed on the label must approve the transfer and a replacement contact must be identified. The responsibility for reviewing records for destruction moves with the record.

Archive Submission

Operating Units must submit records to the University Archives according to the parameters of the record retention schedule. For questions regarding any materials that have potential historical or institutional value but that are not included on the record retention schedule, Operational Units should consult the University Archives for guidance.

Any operating unit that maintains permanent records outside of the University Archives may do so only in coordination with the University Archives.

Archive Review

The University Archives may perform reviews of archived records as often as practical, and generally within every three (3) years.

As a result of the review, if any records are removed from temporary archives, the University Archive staff will consult with the operational unit to determine if the record should be retained or destroyed.

Archive Access

The University Archives may develop and use internal policies and procedures to govern access to and use of archived records. In addition to the access restrictions specified by the operational unit, the University Archives may develop additional access restrictions including, but are not limited to, who may access, duration of access, right to copy and/or distribute, physical locations of access, special handling precautions, copyright considerations, and other restrictions as appropriate to the value of the records to the university.

3.0 Scope

This policy applies to all operating units of Saint Louis University, with the exception of SLU Madrid, including all faculty, staff, students, volunteers, and other workforce members not otherwise identified.

4.0 Procedures

Record Retention Schedule

Example Label

URRC Report Log

Inactive Storage Request Procedures

5.0 Sanctions

Individuals who fail to comply with this policy and the procedures associated with it may be subject to disciplinary actions guided by the University's *Staff Performance Management Policy*, *SLU Faculty Manual (St. Louis Campus)*, or *Student Handbook*. Non-compliance with this policy may result in disciplinary action, up to and including separation from the university.

6.0 Responsibilities

University Record Retention Committee:

- General oversight of the records management system structure;
- Determination if records should fall under the rules of this policy;
- Updates to record retention schedule;
- Authorization of unit personnel to manage operational unit records under this policy; and
- Monitoring and review of effectiveness of records management policies, standards, and processes.

Information Technology Services: Maintains procedures related to the storage, retention, and destruction of electronic records.

Operational Unit: The Operational Unit is responsible for handling records under its control according to policy, standards, and other guidance.

University Archives: The University Archives is responsible for serving as the university repository of

some permanent records, historical documents and information, and other items of enduring or long-term value to the university.

7.0 References

University Policies Including But Not Limited to:

[Non-Retaliation Policy](#)

[Reporting Concerns of Misconduct Policy](#)

[Staff Performance Management Policy](#)

University Resources Including But Not Limited to:

[SLU Faculty Manual \(St. Louis Campus\)](#)

[Student Handbook](#)

External Resources Including But Not Limited to:

8.0 Definitions

Operational Unit: A university administrative unit, office, or function that handles (receives, stores, processes, or disseminates) university records.

Record Retention Schedule: The approved university document that specifies the retention duration and other key decisions about record handling for each category and type of record.

University Archives: The unit so named, which is part of the University Libraries.

University Records: Include any physical or electronic stored information, document, or image created, developed, or received by any academic, clinical, or administrative office of the university in the course of conducting university business or in pursuance of the university's legal obligations.

Definitions of University Record Types

1. **Permanent:** A permanent record is a type of record that has enduring value to the institution's existence and operation.
2. **Temporary:** A temporary record is a type of record that has only temporary value to the institution and is normally not submitted to the Archives. Most university records are Temporary Records. Some Temporary Records may be considered for retention in the Archives

if they have sufficient enduring value.

Definitions of University Record States

A Record may be in only one of the states below. However, a record that is Active, Expired, or Archived may also be a Preserved Record.

1. **Active:** An Active Record is a type of record that has not yet reached the end of the record retention period.
2. **Expired:** An Expired Record is a type of record that has reached the end of its retention period but has not yet been destroyed.
3. **Destroyed:** A Destroyed Record is a type of record that has been destroyed; normally only Expired, non-Preserved records are eligible to be destroyed.
4. **Archived:** An Archived Record is a type of record that is an original university record that has permanent or historic value, is inactive, and is not required to be retained in the office in which it originated or was received, has been submitted to and accepted by the University Archives, and is maintained within the University Archives.
5. **Preserved:** A Preserved Record is a record that has been selected for special handling that supplements and overrides the parameters of the record retention schedule.

9.0 History

This policy revises the *University Records Management and Retention Policy* approved on June 5, 2007.

Approval Signatures

Step Description	Approver	Date
Chief Policy Officer hold before ULC to make required edits	Michael Reeves	Pending
Policy Review Committee	Michael Reeves	12/14/2023
Chief Policy Officer review before PRC	Michael Reeves	12/6/2023

Applicability

SLUCare, Saint Louis University