

Records Management Policy and Procedures

Summary

Columbus State University has a from policy and procedures for managing records.

Purpose

The purpose of the Records Management Policy 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 University System of Georgia
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. Preserve records to document university history and ensure continuity of operations
5. Dispose of records at the appropriate time
6. Protect vital records and information in the event of a disaster

Policy

I. Overview

In accordance with Board of Regents policy, Columbus State University will manage its records as outlined in the BOR Records Retention Schedule. All information and records management practices are to be in accordance with this policy and its supporting procedures outlined throughout this document.

A. Purpose

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4. Preserve records to document university history and ensure continuity of operations
5. Dispose of records at the appropriate time

6. Protect vital records and information in the event of a disaster

B. Scope

This policy applies to all records, including all University Information and University Resources, 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 the University are responsible for managing their records in accordance with this policy.

II. Records Management

A. Records Disposition

The individual or department responsible for creating records is responsible for maintaining and managing their disposition including scheduling destruction dates. Retention periods are listed in the Records Retention Schedule developed by the Board of Regents. It contains guidelines for more than 400 different types of records. This Schedule will be used to determine the minimum retention period for university records. It is available as a PDF and searchable online at:

- http://www.usg.edu/records_management/schedules
- http://www.usg.edu/records_management/documents/USG_retention_schedules2015.pdf

The schedule is not intended to be exhaustive in scope nor will each department necessarily generate all of the records listed. Certain types of records may also appear under two or more categories. The retention period for each listed record is the minimum period of time that an institution must maintain that particular record to meet legal and/or fiscal governmental directives. In exceptional circumstances, some records may need to be kept longer than their retention period, for example any records subject to pending litigation. If a record is not included in the retention schedule, contact the Records Center for assistance.

Current records frequently referenced by the creator shall be kept within the creating office. However, inactive records no longer needed for the function of day to day operations shall be reviewed by the creator to determine their retention. Non-permanent records with a designated destruction time frame must be transferred to the University Records Center.

Many records can be sent directly to destruction. Document destruction service is available to all University departments through the Records Center. Systematic destruction procedures are provided by a bonded disposal company to ensure security and confidentiality. Documents are pulverized into unreconstructable fragments for recycling. Items sent for destruction should be considered official records. Do not send non-records such as outdated pamphlets, telephone directories, advertising junk mail, or blank forms. These can be handled through normal recycling.

Inactive records designated by the Schedule as “Permanent” must be transferred to the CSU Archives for permanent preservation as part of the historical record.

B. Packing and Transfer

Transferring Records to the University Records Center

Review: All records stored in the Records Center must be reviewed and labeled by the creating office. Boxes must be labeled using the template available at:

http://archives.columbusstate.edu/universityrecords/RM_Box_Label.docx

Packing: Records must be packed in boxes that meet Record Center standards. Requirements include:

- Standard Size (12 x 10 x 15)
- Reasonably Sturdy
- Separate Lid
- Includes Cutouts for Handholds

Records within the boxes should be in folders. No hanging files or three ring binders should be included. These interfere with the shredding process.

Boxes with sensitive or confidential information must be sealed for secure shipping across campus.

Transfer: Once records are boxed correctly, inform the Records Center of the pending transfer using the online form available at:

<https://archives.columbusstate.edu/universityrecords/recordstransfer.php>

You will then be contacted by the Records Center staff with a transfer number to include on the box label. We will also schedule a date for transfer. You may self-deliver or coordinate with Campus Services (Logistics) for delivery. Failure to notify the Records Center prior to sending or delivering boxes could result in the records being returned.

As part of the transfer process we require a box inventory. This helps ensure easy access when you need to reference files in the future. The box inventory needs only include the box number and corresponding schedule series. For example:

- Box 1: 0472-01-004
- Box 2: 0472-01-012

Transferring Records to the University Archives

Review: Inactive Records determined to have permanent retention according to the Schedule must be transferred to the University Archives.

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 in 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 for transfer.

Transfer: Once records are boxed correctly, inform the Archives of the pending transfer using the online form available at:

<https://archives.columbusstate.edu/universityrecords/archivestransfer.php>

You will then be contacted by the Archives staff with a transfer number to include on the box label. We will also schedule a date for transfer. You may self-deliver or coordinate with Campus Services (Logistics) for delivery. Failure to notify the Archives prior to sending or delivering boxes could result in the records being returned.

C. Access and Use

To access files after they have been sent to the Records Center, please use the online form available at:

<https://archives.columbusstate.edu/universityrecords/access.php>

To access files after they have been sent to the CSU Archives, please contact either:

David Owings

University Archivist

706-507-8674

owings_david@columbusstate.edu

Jesse Chariton

Archival Associate

706-507-8673

chariton_jesse@columbusstate.edu

Requests for Access from External Individuals

As a state agency, CSU falls under Georgia's open records law and 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 from researchers 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 E.

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. Open Records, Confidential Information, and Freedom of Information Requests

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) protects access to student records.
- Health Information Portability Protection Act of 1996 (HIPPA) protects access to individual medical records.

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 information security officer.

Protocol for Handling Open Records Requests

The University follows the guidelines set forth by the Georgia Board of Regents (BOR). The Information Security Officer serves as the University's Open Records Officer and FOIA Officer for purposes of the Georgia Open Records Act.

Response Requirements

Each Open Records request must be responded to within three business days; however that does not mean that materials have to be provided in three days. The law only requires the University to acknowledge receipt of the request, whether the materials are available, and the estimated time and cost to comply with the request

The Open Records Officer will work in cooperation with University departments to fulfill the requests. Because of the time requirements it is imperative for University departments to notify the Open Records Officer if the request will involve significant staff time. If significant time is involved, please consult with the Open Records Officer prior to fulfilling the request and provide a time/cost estimate. In the official response, the requester will be informed of the associated costs and given the option to authorize the search or decline.

Costs to Fulfill Requests

While individuals have the right to request and receive public records, the University is not required to provide materials free of charge. The University has the right to assess a reasonable charge and therefore it is imperative to keep accurate records of time estimated/involved in the search and retrieval of documents. The rate that can be charged is the salary of the lowest-paid full-time employee, who, in the discretion of the Open Records Officer, has the necessary skill and training to respond to the request. There is no charge for the first 15 minutes of the retrieval time. If copies are requested, the requester shall be charged twenty-five cents per page.

The Process

The Open Records Act provides for a number of legitimate exceptions. It is important that the requester and the University departments complying with an Open Records request be specific concerning the requested information. There may be cases where information needs to be redacted or withheld for legal reasons. For questions and concerns of this nature consult the Open Records Officer who will if necessary research with the BOR Legal Team to determine a resolution before the materials are compiled.

III. Frequently Asked Questions

Where is the University Records Center?

The University Records Center is located on the ground floor of the Simon Schwob Memorial Library.

What are the hours of the CSU Archives?

The CSU Archives is open Monday-Friday 9:00am-12:00pm; 1:00pm-5:00pm.

Who Can Help?

For questions and assistance please contact:

Mark Flynn

Dean of Libraries and Records Management Officer

706-507-8681

flynn_mark@columbusstate.edu

David Owings

University Archivist

706-507-8674

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Jesse Chariton

Archival Associate

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chariton_jesse@columbusstate.edu

Dee Spivey

Chief Information Security Officer

Open Records/Freedom of Information Act Request Officer

706-507-8137

spivey_dee@columbusstate.edu

Where can I learn more?

Additional sources of information can be found online:

<https://archives.columbusstate.edu/universityrecords/>

http://www.usg.edu/records_management

<http://www.georgiaarchives.org>

IV. Glossary of Selected Terms

A

Active record: A record referenced often in the conduct of current departmental business.

Administrative record: Records documenting the day to day operation and administration of an office (e.g., legal, financial, budget, personnel and other common operations).

Archival Record: Permanent record which is inactive and no longer needs to be housed in the office in which it originates. These records are of enduring value and document the history and the development of the organization.

Archives: A repository for the permanent storage of valuable records and documents for the benefit of researchers both present and future.

B

Back-file conversion: See Digitization.

C

Case file: Record groupings that pertain to a specific action, event, person, place, thing, organization, location, program or project. Include personnel, project, and transaction files

Closed File: A file folder in which documents should not be added or removed.

Creator: The person, administrative unit, or organization that originates, receives, or assembles records in the course of normal business.

Current Files Area: The area in which frequently used records are maintained, usually within the creating office.

Cut-Off: The time at which all new (Active) material is placed in a new set of folders and the previous folders (Inactive) are removed from the current files area and transferred to a storage area, records center or archives. The cut-off date varies with the record type and departmental procedures. (eg: __ July 1, end of quarter, end of semester, etc.).

D

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 unless the records are involved with or relevant to audit, litigation, or continuing administrative action.

Digitization: The process of scanning and storing documents digitally.

Disposal: The final removal, whether for destruction or transfer to another records storage center or archives, of records that have reached the end of their retention period.

Disposition: The actions taken regarding records which are no longer needed to support on-going administrative activities in accordance with the University Records Retention and Disposition Schedule. Directions may include destroy, transfer to the University Records Center, transfer to the University Archives, transfer to inactive records storage space, or retain permanently in unit.

E

Electronic Records, Electronic Data, Information and/or Record: Any form of digitally recorded material generated, transmitted, received and/or stored that is designated a record by data owner or law, based on content and/or subject matter. This includes but is not limited to electronic digital interchange, email, digital/text voice messages, instant messages and text messages.

F

File Series: A set of documents all having the same subject. For example, invoices, purchase orders, resumes, job descriptions, and meeting minutes are all different series (classes) of documents. (May also be referred to as Class)

FERPA: The Family Educational Rights and Privacy Act of 1974, commonly referred to as the Buckley Amendment, protects the rights of students by controlling the creation, maintenance, and access to educational records. It guarantees students' access to their academic records while prohibiting unauthorized access by others.

Format: The physical form in which material appears — books, slides, photographs, film, recordings, etc....

Freedom of Information ACT (FOIA): A law enacted in 1966, requiring that government records except those relating to national security, confidential financial data, and law enforcement be made available to the public on request.

G

Georgia Open Records Act (O.C.G.A. 50-18-70): This is a state law requiring that public records be open and available for inspection by any member of the public. Any member of the public may request an inspection of any public record. It is not necessary for the requestor to show particular need or interest in the matters covered by the record in order to gain access. USG institutions must provide access to existing public records in its custody or under its control within three business days, including those it has created and those it has received in the course of its operation. Institutions are not required to create a record which does not exist at the time of the request nor are they required to compile requested information into a single document. [Open record exceptions include:

- medical and veterinary records and other materials involving matters of personal privacy;
- records relating to pending investigations;
- records required by the federal government to be kept confidential, such as student educational records;
- trade secrets and certain information of a proprietary nature;
- certain research data, records, or information that has not been published, patented, or otherwise publicly disseminated;
- personal and financial information of donors
- confidential evaluations submitted to a public agency in connection with the hiring of a public employee.

GLBA, Gramm-Leach-Bliley Act: The Gramm-Leach-Bliley Act, (GLBA) effective May 23, 2003, addresses the safeguarding and confidentiality of customer information held in the possession of financial institutions such as banks and investment companies. GLBA contains no exemption for colleges or universities. As a result, educational entities that engage in financial activities, such as processing student loans, are required to comply. GLBA and other emerging legislation could result in standards of care for information security across all areas of data management practices both electronic and physical (employee, student, parents, customer, alumni, donor ...etc.). As part of this act, personal information means any non-public financial information about an individual that is handled or that is maintained by or on behalf of the university or its affiliates. The definition of personal information is very broad and may include: social security numbers, credit card numbers, bank account numbers, credit history or rating, tax return information, student grades (FERPA), medical records (HIPPA).

GPIPA (Georgia Personal Identity Protection Act of 2007(O.C.G.A. 10-1-910 thru 10-1-912): Security Breach Notification Law; Georgia's breach notification law was amended in 2007 to include public universities and other state and local agencies. Personal information protected by GPIPA includes the combination of an individual's full name, or first initial and last name with one of the following, when not encrypted or redacted: Social Security Number; Driver's license number or state ID card number; Account, credit card, or debit card number; Account passwords, personal identification numbers, or other access codes .

H

HIPAA: The Health Insurance Portability and Accountability Act of 1996; The portion of this law of particular importance to Records Managers, are the standards dealing with the privacy of health information which helps prevent improper use of one's medical record. Protected Health information is considered any patient identifiable data including but not limited to: social security number, name, demographic data (address, telephone number, fax number, sex, date of birth, etc.), diagnosis, e-mail address, medical record number, account number.

I

Inactive records: Records no longer required by their creating unit or other units to carry on current business and therefore ready for final disposition in accordance with the University Records Retention and Disposition Schedule.

J

Journal: In accounting, a (book) register of daily transactions that are posted to the general ledger (e.g.: payroll, sales)

L

Legal Hold: A legal hold, also known as a "preservation order" or "hold order" is a temporary suspension of the company's document retention destruction policies for the documents that may be relevant to a law suit or that are reasonably anticipated to be relevant. It is a stipulation requiring the company to preserve all data that may relate to a legal action involving the company. A litigation hold ensures that the documents relating to the litigation are not destroyed and are available for the discovery process prior to litigation.

Life Cycle of Records: Records management's three stages of a record: creation, maintenance and use, and disposition.

M

Machine-readable: Records that must be read by using hardware and/or software.

Medium (Media): The physical makeup of recorded information. (eg: paper, film, disks, etc.)

N

Non-current record: See Inactive Records.

O

Off-site Storage: A facility other than the normal place of business where records are stored for protection.

Office of record: The office that maintains an “official record” copy of a document, in support of state business, as opposed to a duplicate.

Official Copy: A document possessing public record status, created or received by a state officer or state employee, while conducting state business and serving state government in an official capacity. This is the copy that must be kept the entire retention period.

Out Card: Card inserted in place of a file that has been removed from its place of storage/file cabinet for access. The out card should identify the records, the date taken, and the person taking them.

P

PCI DSS: Payment Card Industry Data Security Standard; While not a law, compliance with the PCI Data Security Standard is required to accept major credit cards for business transactions on a USG campus. PCI DSS defines protected customer financial information, and establishes security best practices to safeguard that information. Expensive fines may result from mishandling of financial data, as well as potential revocation of credit card processing services.

Pending file: Correspondence, reference and similar materials, filed in chronological order and generally used for reference and convenience.

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.

Personal Papers (Personal files or personal records): Materials belonging to an individual that are not used to conduct agency business or that are used exclusively for that individual's convenience. Must be clearly designated as such and kept separate from the agency's records.

Public Record: According to the Open Records Act (O.C.G.A. 50-18-70), (public) records are “all documents, papers, letters, maps, books, tapes, photographs, computer based or generated information, or similar material prepared and maintained or received in the course of the operation of a public office or agency”

R

Record Copy: The single official copy of a document maintained on file by an administrative unit of the University. A record copy is sometimes termed the file copy.

The record copy is usually, but not always, the original. A record copy may be held by the creating office or another office of record.

Records: “recorded information in any form, including data in computer systems, created or received and maintained by an organization or person in the transaction of business and kept as evidence of such activity”. Georgia statute defines records as “all documents, papers, letters, maps, books (except books in formally organized libraries), microfilm, magnetic tape, or other material, regardless of physical form or characteristics, made or received pursuant to law or ordinance or in performance of functions by any agency” (Official Code of Georgia Annotated, § 50-18-91[5]).

Records Center: A storage space or facility for the high-density and low-cost storage and maintenance of semi-active or inactive records pending their scheduled final disposition.

Records Inventory: A survey of records to determine the size, scope, and intricacy of the department/agency’s records. It should include the record series, inclusive dates, types of records, quantity, arrangement, and description.

Records Management: A field of management responsible for the systematic control of the creation, maintenance, use, reproduction, and disposition of records.

Records Manager: The person assigned primary responsibility for the records management program.

Records Series: A group of identical or related records that are used, filed, and disposed of in a similar fashion. (Human Resources & Student records are examples of Record Series, while College Department Student Files and Veterans Records are types of records that fall under the Student Records Series. Each record type would have a separate Retention schedule.)

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 stored in an archival area (i.e., records as of June 30, 2007 having a retention period of three years should be kept until June 30, 2010).

S

Sensitive Data: Any information whose compromise may cause harm to an individual or institution and includes academic (FERPA), medical (HIPAA), and identity numbers.

Subject Files: Records arranged and filed according to their general informational, or subject, content. Mainly letters and memorandums but also forms, reports, and other material, all relating to program and administrative functions, not to specific cases. (Also known as general correspondence files)

T

Transfer: The process of moving records from one location to another. For example: ___
From office space to storage facility, Records Center, or Archives.

Transitory Records: Routine correspondence with short-term records value, to be destroyed after the action covered by this correspondence is completed.

Transmittal Sheet: Used by agencies in transferring records to the Records Center or Archives, which lists box contents along with other statistical data.

U

Until Obsolete: Retention period assigned to records that become valueless on a non-routine basis.

Until Superseded: Retention period assigned to records that are routinely updated or revised and where the previous version has no continuing value.

V

Vital (Essential) Records: Records containing essential information, necessary for the resumption of operations after a disaster, the reestablishment of the legal and financial status of the organization, and to fulfill obligations to the organization, its students and employees, and to outside parties.

W

Working Copies/files (Reference Only Copies): Documents with short-term or transitory use and used as reference-only. May include rough notes, calculations, or drafts used to prepare or analyze other documents. Working copies are documents that have no administrative, operational, financial, legal or historic value.

Related USG Policy

10.4 Records Retention

Last Update

7/28/2016

Responsible Authority

Head of CSU Archives