

# COLUMBIA UNIVERSITY POLICY ON RECORDS RETENTION

**Effective Date: May 2011**  
**Revision: July 2015**

## **Policy Statement**

Columbia University's Records Retention policy establishes the Records Retention Schedule (the "RRS"). The RRS lists the types of University records and their retention period for records for which each department is the Office of Record. It is based upon legal and operational requirements and provides a framework for the life cycle management of University records.

## **Reason(s) for the Policy**

This policy is intended to assist the University in properly protecting and managing the records it needs to maintain, while eliminating the records that are no longer legally or operationally required. This will help to ensure that the University is following all applicable laws and regulations governing records retention and eliminating unnecessary records storage costs.

## **Primary Guidance to Which This Policy Responds**

This policy responds to the various local, state, and federal statutes and regulations and internal policies that apply to records retention.

## **Roles and Responsibilities**

### **Office of Record**

The Office of Record is responsible for identifying the records to be retained and determining, in collaboration with OGC, the period of retention. The Office of Record must also make arrangements for the proper storage of the records and coordinate with outside vendors for that purpose, where appropriate. Finally, the Office of Record arranges for the handling of the disposal of records whose retention period has expired.

### **Office of the General Counsel**

The Office of the General Counsel (OGC) is responsible for providing guidance regarding the legal retention requirements for documents and coordinating document holds when litigation is ongoing, pending, threatened, or likely. The University's General Counsel will designate one or more individuals to serve as the point of contact.

## **Responsible University Office**

Office of the General Counsel

## **Revision History**

This policy revises an earlier version, dated May 2011. The May 2011 policy codified existing retention policies and procedures under the University's standard policy format.

### **What Is Governed By This Policy**

The specific records covered by this policy are listed in the RRS. Any record not listed on the RRS is *not* covered by this policy and should be retained in a manner consistent with existing practice and procedure. Please note that the University has separate policies and procedures for records containing personal health information available at:

<http://www.cumc.columbia.edu/hipaa/>.

### **Who Should Know This Policy**

All University employees, including student workers and temporary workers

All contractors who create, use, or store University records

All consultants who create, use, or store University records

All vendors who create, use, or store University records

### **Exclusions & Special Situations -- Document Holds**

Any records relevant to pending or ongoing litigation, government investigation, or audit **MUST BE RETAINED** until such matters have been resolved, all appeals are exhausted, and the retention period has expired. All disposal of relevant records must cease, including the disposal of records according to approved retention periods, when such a document hold is in place. In cases where litigation is threatened or likely, consult the Office of the General Counsel to determine whether a litigation hold is required.

### **Policy Text**

Each RRS lists records that are specific to the particular Office of Record. Records not included in a RRS should be retained in a manner consistent with existing practice and procedure.

The Office of Record is the department that is fully responsible for the “official” copy of a record for the duration of the total retention period. Other departments that may have a copy of these records should retain the copy only as long as it is useful, except to the extent the records are subject to a document hold (see Exclusions & Special Situations – Document Holds above).

### **A. Defining a Record**

Records are documents and parts of documents contained on any media and in any format that: are made or received by the organization; provide evidence of its operations; document business decisions; and/or have value requiring their retention for a specific period of time.

Examples include, but are not limited to:

- Letters, memoranda and correspondence
- Policies, procedures and methods
- Invoices and receipts
- Purchase orders, contracts and certificates
- Tax forms
- Data stored in computers, data processing equipment, and off-line media
- Computer programs and documentation

- Memory in pagers, cell phones and PDAs

The RRS can be found in the Appendix of each record retention policy posted in the Administrative Policy Library. The RRS includes a description of the record, the department responsible for the record and the retention schedule for that record.

**Note:** This list is for purposes of this Policy only, and is not meant to provide a comprehensive list of records for purposes of any document hold. Recipients of a document hold should refer to the text of the hold itself for instructions regarding what types of records must be retained.

#### **Non-Records:**

Non-records are copies of records maintained in more than one location (provided such records are not subject to a document hold (see Exclusions & Special Situations – Document Holds above) or materials available from public sources that can be disposed of at the discretion of the user. They include:

- Duplicates of original records, including:
  - Information copies of records maintained by departments that are not the Office of Record

**Note:** In some instances, annotating copies of records may necessitate that they be maintained

- Preliminary drafts including:
  - Drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps and/or decisions in the preparation of the official record
- Books, periodicals, manuals, training binders, newspapers, and other printed material obtained from outside sources and retained primarily for reference purposes
- Materials not filed as evidence of a department's operations that have no informational value
- Spam, junk mail, and Listserv messages
- Blank forms

Note that disposition of records created, retained, or stored in information systems or computers should proceed on the same basis as traditional paper records. Digital or electronic records which are not covered by a schedule associated with this policy, such as e-mail, should be deleted promptly. See email the Email Usage Policy for more specific guidance.

#### **B. Maintaining the RRS**

Under the auspices of the Office of General Counsel, each department with a record retention policy posted in the Administrative Policy Library is responsible for ensuring the review and revision, if applicable, of the RRS. Periodically, it may be required that new records be added or that records that are no longer applicable be removed. It is recommended that each department review its RRS every three years for accuracy.

#### **C. Disposal of Records**

Records need not be retained by departments beyond their retention periods, as defined in the approved RRS, unless valid business reasons for their continued retention are provided or they are required under a document hold (see Exclusions & Special Situations – Document Holds above). Disposal of records pursuant to this policy should occur regardless of the medium on which records appear or their location.

As a general rule, records may be disposed of if:

- They have outlived their retention period per the approved RRS, AND
- Continued preservation is not required per a current document hold.

University records should be reviewed periodically.

**All disposal of records, whether paper or electronic, must be accomplished pursuant to the University Sanitization and Disposal of Information Resources Policy.**

**(<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>).** That Policy provides for particular methods of disposal (e.g., cross-shedding and/or approved electronic disposal) either on-site or through an approved outside vendor for records that may contain any sensitive or identifying personal information, to ensure that unauthorized individuals cannot access the information.

Sensitive or identifying personal information includes, but is not limited to, social security number, driver's license number, mother's maiden name, account numbers or codes, personal financial information, and/or protected health information.

#### **D. Ongoing Retention of Records**

Unless required to be retained pursuant to the approved RRS or a document hold, records should be purged of extraneous materials (e.g., non-current drafts of documents, rough notes, routine email, etc.) on a regular basis.

#### **E. Retention of Records in Storage**

Each department is responsible to assure that the disposal of records in archive storage for which it is the Office of Record takes place unless a document hold is in effect.

## **Contacts**

Any questions or inquiries with respect to the administration of this policy should be directed as follows.

### **Questions regarding the application of the policy:**

Please submit inquiries via an Incident in Service Now:

Web form: <http://finance.columbia.edu/content/finance-service-center>

## **Cross References to Related Policies**

- [Document Images as Document of Record Policy](#)
- [Human Resources Records Retention Policy](#)
- [Office of Internal Audit Records Retention Policy](#)
- [Office of Management and Budget Records Retention Policy](#)
- [Office of the Treasurer Records Retention Policy](#)
- [Procurement Records Retention Policy](#)

## **Sanitization and Disposal of Information Resources Policy**

(<http://policylibrary.columbia.edu/sanitization-and-disposal-information-resources-policy>)