**Issuing Office**: Contracts and Compliance **Policy Number**: FY15-C&C-001-00

**Policy Name**: Paper Records Management, Retention, and Disposition Policy

**Original Date Issued**: Wednesday, June 30, 2015

**Purpose**:

To properly retain important UMass Boston records as defined in this policy, protect documents that may be needed for future use, preserve the history of the campus, and comply with legal and regulatory standards.

The goal of this policy is to assist campus departments in complying with the UMass Boston Standard Records Retention Schedule. It:

- Establishes standard schedules governing the retention and disposition of UMass Boston paper records;
- Establishes the procedure for preserving paper records;
- Establishes consistent, systematic, and secure practices to ensure that employees use, store, retain, and dispose of paper records in accordance with this policy;
- Ensures that records custodians follow the UMass Boston standard schedules governing records retention and disposition; and
- Establishes guidelines for transferring historic materials to the University Archives and Special Collections.

This policy is based on the University of Massachusetts Board of Trustees Doc. T99-061: University of Massachusetts Record Management, Retention and Disposition Policy; the University of Massachusetts Record Management Guidelines of January 2013; and the regulations and laws of the Commonwealth of Massachusetts, the United States, and other accrediting or regulatory bodies. If this policy conflicts with any applicable law, the law must take precedence.

Implementation: The Records Management program at UMass Boston will be implemented over the next six months. Implementation includes training, appointing records custodians, applying the standard schedules to department records in accordance with this policy, entering department record inventories into the records database, and disposing of records whose retention schedule has expired.

Note: Other forms of UMass Boston records (i.e. electronic) will be addressed in future



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policies.

**Applicable to**:

All UMass Boston departments as follows:

- All paper records generated or received by UMass Boston, whether located in offices or storage units and whether owned or used by UMass Boston or its employees (Guidelines).
- Anyone handling documents for UMass Boston; all employees whether full-time, part-time, or on a seasonal or temporary basis (Guidelines).

**Policy:**

The UMass Boston Records Administrator is the Assistant Vice Chancellor for Contracts and Compliance.

The Records Review and Oversight Committee (the "Committee"), chaired by the Records Administrator, is responsible for oversight and enforcement of the policy. The Committee will periodically review this policy and may recommend changes. It includes representation from the following areas:

Academic Affairs
Administration and Finance
Budget and Financial Planning
Contracts and Compliance
Controller's Office
Enrollment Management
Facilities
Health Services
Human Resources
Information Technology
Library
Office of Research and Sponsored
Programs Procurement
Public Safety
Receiving Department
University Archives and Special Collections

The Records Administrator will convene the Committee.


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Each campus department will appoint a records custodian to manage paper records within the department according to this policy.

All records will be categorized as UMass Boston Records, Third Party Records, Non-Records, Legal Hold Records, Confidential Records, or Records of Historic Value (see Definitions section below).

Retention Periods

UMass Boston regards the time periods set forth in the Massachusetts Statewide Records Retention Schedule, disseminated by the Secretary of State of the Commonwealth of Massachusetts, as a useful guide for establishing retention periods for various categories of records (Guidelines).

The Records Administrator will issue and maintain UMass Boston Standard Records Retention Schedules ("standard schedules") for the following classes of campus documents:

- Schedule A—Administration
- Schedule B—Legal and Regulatory
- Schedule C—Facilities, Transportation, and Construction
- Schedule D—Fiscal
- Schedule E—Personnel
- Schedule F—Information and Records Management
- Schedule H—Education
- Schedule I—Environment and Energy
- Schedule J—Public Safety
- Schedule K—Health and Human Services

The standard schedules are available online through the Records Database and the Contracts and Compliance website.

Three reference documents have been created to assist records custodians with their records; see Attachment A, "Commonly Found Records in Administrative Offices,"


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Attachment B, “Commonly Found Records in Faculty Offices,” and Attachment C, “Department Steps for Managing Records.”

Departments are responsible for applying the standard schedules to their records in accordance with the policy. Only one complete copy of each record should be retained, preferably the original version. Records falling under multiple retention periods should be retained for the longest applicable retention period. If a contractual agreement states that records must be kept for longer than their standard retention period, records should be retained for the period specified in the agreement. If a department has records that are not listed on the standard schedules, they must work with the Records Administrator to determine the appropriate retention period for these records. Any new schedule items will be approved by the Records Administrator and added to the standard schedules (Guidelines).

The Records Administrator will also maintain a list of all legal holds in place on campus and ensure proper compliance. Records subject to a legal hold should not be disposed of until after the legal hold ends, regardless of their standard retention schedule. All correspondence related to legal holds should be directed or forwarded to the Assistant Vice Chancellor for Contracts and Compliance.

Records Database

A master list of all standard schedules is available in the online Records Database. Each department’s records custodian has access to this database and will enter data for all of their current records with retention schedules. The database maintains summaries of the manner and method by which each department is retaining and storing its records. Records will be organized in the database by department, retention period, and storage location. Records custodians are also responsible for updating the Records Database after records disposition.

Record Substitution

Records in paper form may be digitally scanned or put on microfilm or microfiche and substituted for the original document, unless this is prohibited by law or regulation. The applicable retention period for a record does not change when a properly substituted image of the record is created. A record’s standard retention period begins according to the original record’s creation, not the date on which the substitute image was created. When records custodians examine records kept by their department, should they find information kept in machine-readable format as well as hard copy, the record maintained in machine-readable format should be preserved to comply with the standard schedule and the paper copy destroyed in compliance with MGL c 93 I. (Guidelines). See STEP 5 below.

Inappropriate Treatment of Records

If an employee becomes aware of the inappropriate removal, modification, or destruction of any UMass Boston Record, they must notify their supervisor or the Records Administrator about the inappropriate activity immediately (Guidelines).

Departure of UMass Boston Employees

When an employee leaves UMass Boston, the records they created or maintained during their time on campus are still UMass Boston Records and should be properly retained and destroyed pursuant to the standard schedules (Guidelines).

**Procedure**:

Records management is the responsibility of both record creator(s) and user(s).

Each department will appoint a records custodian for the department. The records custodian must attend annual training and familiarize him or herself with any state or federal laws relating to the subject area in which he or she works. The records custodian will annually:

- Categorize and classify records according to the standard schedules.
- Update the Records Database with retention and disposition information for records with retention schedules.
- Store and maintain records according to the standard schedules.
- Review records to ensure they are being retained appropriately.
- Dispose of records at the end of their retention period in a secure manner.

**STEP 1:**

The Records Administrator issues standard schedules and updates the Records Database. Each department appoints a records custodian, who attends annual training.

**STEP 2:**

The department categorizes and classifies its records in accordance with the standard schedules. If the department has records that are not included on these schedules, they must contact the Records Administrator with a proposed retention period and disposition


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method and provide justification. Any new record categories will become part of the standard schedules and will be put into the Records Database.

**STEP 3:**

The department inputs its inventory of records that have a retention schedule into the Records Database. The inventory must list all records for which the department is the "owner" (responsible custodian) as well as the time period for which each record must be retained, the records' location, and the appropriate method of disposition.

Records that are retained until administrative use ceases are not entered into the database. These records are maintained by the department and must be disposed of when the department no longer needs them. If the records are of possible historic value, they should be sent to the University Archives and Special Collections. Otherwise, shred or recycle according to STEP 5.

**STEP 4:**

Records must be maintained on UMass Boston property, in the University Archives and Special Collections, within the State Archives, or in a private storage facility. Departments storing records at third-party facilities will pay the cost for these services and enter into a records management agreement with the facility, a copy of which will be provided to the Records Administrator. The location of all records stored off-site will be entered into the Records Database.

**STEP 5:**

- The Records Administrator sets an annual date by which all records whose retention period has expired, or whose administrative use has ceased, during the preceding 12 months must be destroyed.
- Prior to disposition, departments must contact the University Archives and Special Collections to review records for possible historic value to UMass Boston. This includes all records except for financial and administrative records, such as purchase orders, contracts, grants, payments, HR records, and student records. When in doubt, contact the Archives.
- Departments must complete a records disposal form before shredding or recycling any of their records.
- The method of disposition depends on the content of each record. For example, records with personally identifiable information (PII) must be destroyed in accordance with MGL c 93 I; these confidential records should be placed in locked


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areas until they are shredded. Records that contain no personal information may be recycled. **When in doubt, shred!** There is an industrial shredder available for department use in the Receiving Department, located at the Central Loading Dock. Please contact the Receiving Department to schedule a time to utilize the shredder.

**STEP 6:**

Departments update the records database with the disposition date for all disposed records with retention schedules.

Note: For a department reference sheet see Attachment C, "Department Steps for Managing Records."

**Definitions:**

Records are any items that contain recorded information in any medium and regardless of form or characteristic (Guidelines). Paper records include correspondence, reports, meeting minutes, agendas, notes, books, photographs, maps and blueprints, and any other physical documents found on campus.

UMass Boston Records are generated or received by or on behalf of UMass Boston and include information pertaining to campus business, resources, or activities. This definition is to be interpreted broadly (Guidelines). UMass Boston Records include but are not limited to formal meeting minutes and the final version of any document or correspondence generated or received by UMass Boston. UMass Boston Records do not include working drafts of documents subsequently edited or finalized. Notes made by employees either on or otherwise incorporated with other records become part of those records.

Third-Party Records are generated or received by UMass Boston pursuant to a contract or other agreement with a third-party entity, for example a client, a collaborating institution (including other institutions within the University of Massachusetts system), or certain types of funding agencies. The documents may be (a) owned by the third party but maintained by UMass Boston, (b) owned by UMass Boston with the third party retaining rights to review or copy the records, or (c) governed by more complex provisions such as joint ownership or an option by the third party to assume ownership of the records when UMass Boston's retention requirements expire. The relevant retention periods may be defined by agreements, contracts, and state or federal retention requirements. Special care should be exercised with respect to the specific recordkeeping provisions in each third-party relationship. This is best initiated and exercised through thoughtful and



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appropriate language in the applicable agreement. In general, Third-Party Records should not be destroyed without consulting the third party, except as specifically stated in the applicable agreement.

Non-Records are non-essential documents and do not need to be retained after their administrative use has ceased. In general, when reviewing a document to determine whether it is a UMass Boston Record or a Non-Record, records custodians need to think about the reasons UMass Boston might preserve the information and how the document and its content could be used. It is the responsibility of records custodians to determine whether a document is a UMass Boston Record or a Non-Record (Guidelines).

Examples of Non-Records include:

- Duplicate copies of documents, unless the duplicate contains information not on the original about administrative action taken by UMass Boston; for example, a copy of a letter which contains notes about the proposed response;
- Publications, forms, manuals, or other printed documents which have become obsolete, outdated, or do not have any administrative retention requirements;
- Requests from the general public for basic information such as brochures;
- Transmittal documents containing no additional information relative to the transmitted material;
- Published or reproduced materials that require no administrative action and which serve no documentary purpose; e.g., copies of newspaper articles;
- Working papers, preliminary drafts, or other materials which have been summarized in final or other forms and which have no value once an action has been taken; and
- Transitory correspondence, e.g. that confirming meeting dates.

If there is any doubt as to whether an item is a Non-Record, it should be considered a UMass Boston Record. Additionally, please note that Non-Records (particularly publications and correspondence) may still be of interest to the University Archives and Special Collections, who should be contacted before the disposition of any records.

Legal Hold is a directive by the University Office of the General Counsel which alerts some segment of UMass Boston that an investigation, litigation, or other legal action has been, or may be, filed against the campus. Once a legal hold is in place, UMass Boston is charged with preserving every relevant document covered by the hold, including Non-Records, until the obligation has been met. Records subject to a legal hold may need to be retained for a longer period of time than required by the standard schedules (Guidelines).

Confidential Records contain personally identifiable information (PII), are designated as confidential by state or federal law, or contain information the disclosure of which would


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harm either the privacy of individuals or the security or proprietary business interests of UMass Boston. Confidential information may include, but is not limited to, patient or medical information, student educational records, financial or identification numbers related to an individual, and security plans (Guidelines).

Records of Historic Value, under state law, are all records created prior to 1870. The University Archives and Special Collections may deem certain records created after 1870 to be of historic value for UMass Boston's own purposes. Records of Historic Value may not be destroyed and should be sent to the University Archives and Special Collections (Guidelines).

**Oversight Department**: Contracts and Compliance

**Responsible Party within Department**: Assistant Vice Chancellor for Contracts and Compliance

**Monitoring:**

Department heads are responsible for ensuring compliance with this policy. The Records Administrator will communicate and coordinate with departments to facilitate and assist with compliance.

The Records Administrator will review the records database annually to ensure that:

- Departments have entered all new records with retention periods into the database, and that
- Departments have disposed of all records whose retention periods have passed and updated the database accordingly.

Any questions about this policy should be directed to the Assistant Vice Chancellor for Contracts and Compliance.

**Authority**:

- University Board of Trustees' Policy: University of Massachusetts Record Management, Retention and Disposition Policy (Doc. T99-061 adopted August 4, 1999, and as amended)
- University of Massachusetts Record Management Guidelines (January 21, 2013)
- Massachusetts Statewide Records Retention Schedule 02-11



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- University-Wide Internal Control Plan

- UMB Internal Control Plan

**Related Documents:**

- UMass Boston Standard Records Retention and Disposition Schedules

**Official documents are online and updated regularly.**

Attachments:

- Attachment A: Commonly Found Records in Administrative Offices
- Attachment B: Commonly Found Records in Faculty Offices
- Attachment C: Department Steps for Managing Records



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# Commonly Found Records in Administrative Offices

| Document: | Owner: | Retention Period: | Retention Period Begins: |
|---|---|---|---|
| Meeting minutes and agendas: | | | |
| Staff meetings | Department | Until administrative use ceases | N/A |
| Official committee records (Committee Chair) | Department that established committee | Permanent | Upon Creation |
| Financial records: | | | |
| Campus budget | VC for A&F | Primary copy: Permanent | Upon creation |
| Departmental budget | Department | Until administrative use ceases | N/A |
| Purchase 0rders and related documents | Procurement | 6 years | After payment |
| Payments | Controller | 12 years | After payment |
| Procard records | Department/Controller | 12 years (kept by department for 2 years, then Controller for 10 years) | After payment |
| Travel reimbursement | Controller | 12 years | After payment/disbursement |
| Cash receipts and deposit slips | Bursar | 8 years | Upon creation |
| Journal entries | Controller | 12 years | Upon creation |
| Grant records: | | | |
| Awarded | ORSP | 6 years | After last financial report |
| Unfunded | ORSP | 3 years | After submission |
| Research data and results | Department | 7 years | After grant expiration |
| Personnel records: | | | |
| Personnel Files | Human Resources | Permanent | Upon separation |
| PAs and related documents | Human Resources | Permanent | Upon creation |
| Recruitment files | Department/Human Resources | 3 years (department keeps until HR calls for records) | Upon closure or completion |
| Time and attendance | Human Resources | 6 years | Upon creation |
| Employee memos | Human Resources | Permanent (part of personnel file) | Upon creation |
| Intern and volunteer | Department | 6 years | Upon separation |
| Recommendation Letters (for current and past employees) | Department | 3 years | Upon creation |

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| | | | |
|---|---|---|---|
| Student records:<br>Grades<br>Exams and papers<br><br><br>Student Evaluations of Faculty<br>Masters Theses and Dissertations<br>Disability records | <br>Registrar<br>Faculty/Department<br><br><br>Department<br>Department<br><br>Office of Diversity & Inclusion | <br>Permanent<br>Qualifying exams for degree programs are permanent, all other tests and exams 1 year<br>6 years<br>Permanent<br><br>6 years | <br>Upon Creation<br>End of semester<br><br><br>End of semester<br>End of semester<br><br>After graduation or separation |
| Schedules and calendars | Department | Until administrative use ceases | N/A |
| General correspondence and memos | Department | 3 years | Upon creation |
| Reference materials | Department | Until administrative use ceases | N/A |
| Official publications, brochures, and booklets created by the department | Creating department | Permanent or deposit into University Archives and Special Collections | Upon creation |
| Policy and procedure records:<br>Final policy and substantive support materials that add to understanding of the policy<br>All other materials | <br>Vice Chancellor/Provost<br><br><br><br>Vice Chancellor/Provost | <br>Permanent<br><br><br><br>3 years | <br>Upon creation<br><br><br><br>After admin. use ceases |
| Program development and review records | Vice Chancellor/Provost | Substantive materials: Permanent | Upon creation |

- Departments are only responsible for retaining records for which they are the owner. All other records should be kept until administrative use ceases. If you have the original document, send it to the owner.
- All records containing Personally Identifiable Information (PII) **must** be shredded. PII is sensitive information identifying an individual person or campus business; examples include social security or other ID numbers; home address, phone number, or email address; photographs or fingerprints; credit card numbers or other financial information; and medical information. Records that contain no personal information may be recycled. **When in doubt, shred!**
- The archives is interested in reviewing all records before destruction except personnel, student, financial records, such as purchase orders, contracts, grants, payments, and procard records.

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# Commonly Found Records in Faculty Offices

| Document: | Owner: | Retention Period: | Retention Period Begins: |
|---|---|---|---|
| Financial Records:<br>Payments<br>Procard Records<br><br>Cash receipts and deposit slips<br>Travel Expense Records<br>Purchase orders | <br>Controller's Office<br>Department/Controller's Office<br>Bursar<br>Controller's Office<br>Procurement | <br>12 years<br>12 years (kept by department for 2 years, then Controllers for 10 years)<br>8 years<br>12 years<br>6 years | <br>After payment<br>After payment<br><br>Upon creation<br>After payment<br>After payment |
| Grant Proposals:<br>Funded<br>Unfunded | <br>ORSP<br>ORSP | <br>6 years<br>3 years | <br>After last financial report<br>After submission |
| Research Records:<br>Grant-funded<br>Non-grant | <br>Department<br>Faculty | <br>7 years<br>After administrative use ceases | <br>After grant expiration<br>After grant expiration |
| Personnel Records<br>Recruitment Files | HR<br>Department/HR | Permanent<br>3 years (department keeps until HR calls for records) | Upon separation<br>After last activity |
| Student Records:<br>Student Grades<br>Student Exams and Papers<br>Student Disability Records<br><br>Student Evaluations of Faculty<br>Masters Theses and Dissertations | <br>Registrar<br>Faculty<br>Office of Diversity and Inclusion<br>Department<br>Department | <br>Permanent<br>1 year<br>6 years<br><br>6 years<br>Permanent | <br>Upon Creation<br>End of semester<br>After graduation or separation<br>End of semester<br>End of semester |
| Committee and Task Force Records and Minutes | Department that established committee | Committee establishment records and primary copies of meeting minutes, meeting materials, and reports: Permanent<br><br>Committee members' records: After administrative use ceases | Upon Creation |
| Faculty Council Records & Minutes | Provost | Permanent | Upon Creation |

*NOTE* If the owner is not Department or Faculty, then records are not the official copy and should be kept only until administrative use ceases.
**NOTE** All records containing Personally Identifiable Information (PII) **must** be shredded. PII is sensitive information identifying an individual person or campus business; examples include social security or other ID numbers; home address, phone number, or email address; photographs or fingerprints; credit card numbers or other financial information; and medical information. Records that contain no personal information may be recycled. **When in doubt, shred!**

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# Attachment C—Department Steps for Managing Records

**Step 1: Appoint a Records Custodian**

Each department appoints a records custodian, who will attend annual training and familiarize themselves with applicable laws and regulations relating to their subject area of work.

**Step 2: Survey Records**

Each department categorizes and classifies all of their records in accordance with the UMass Boston standard schedules, which can be found on the Contract and Compliance website. If a department has records that aren't included on the standard schedules they will work with the Records Administrator (the Assistant Vice Chancellor for Contracts and Compliance) to determine an appropriate retention period, which will be added to the standard schedules.

**Step 3: Input Records to the Database**

Each department inputs data on all of their retained records into the online records database, which is linked to the Contracts and Compliance website. The database lists:

- All types of records owned by the department;
- The time period for which each category of records must be retained;
- The records' storage location; and
- The appropriate method of disposition.

**Step 4: Property Store Records**

Records can be maintained either on UMass Boston property, in the University Archives and Special Collections, in the State Records Center, or in private storage facilities.

Departments should review their records periodically to ensure they are being retained properly.

**Step 5: Properly Dispose of Records**

- The Records Administrator will set an annual date on which all records whose retention periods have expired in the preceding 12 months must be destroyed.
- Departments must contact the University Archives and Special Collections for review before disposing records of any records that may have historic value.
- Departments must complete a records disposal form for records that have retention schedules.
- The method of destruction depends on the content of each record. Records with personally identifiable information are confidential and should be placed in locked areas until they can be shredded. Records that contain no personal information can be recycled. **When in doubt, shred!**

**Step 6: Update the Database**

- After disposition, departments must update the database with information on all of their records that have been disposed of.