

Policy on Records Management

[DRAFT 20260317]

Policy Title	Policy on Records Management
Policy #	02.121.1
Policy Owner	Director of Records Management
Contact Information	Questions regarding this policy can be directed to the Director of Records Management at (401) 874-5375
Approved By	President of the University of Rhode Island
Effective Date	
Next Review Date	No later than
Who Needs to Know About this Policy	All departments, offices and employees, including staff, faculty, and contractors, creating and receiving records while conducting University business, from any location and in any format.
Definitions <i>Defined terms and shorthand references are capitalized throughout.</i>	<p>Access to Public Records Act (“APRA”). The Rhode Island state law that requires records to be accessible to the public and details which types of information found within Records is exempt from public disclosure.</p> <p>Disposal or Destruction. Disposing of a record once its retention period has been met and it is no longer needed for business or historical purposes.</p> <p>Electronic Document Management System (“EDMS”). Software that manages electronic records in accordance with records management requirements, standards, and best practices.</p> <p>Public Records Administration (“PRA”). The state office that oversees records management functions within state and local government in Rhode Island under the Secretary of State.</p> <p>Record. Any recorded information that an organization creates or receives during the course of business in any format. Formats include but are not limited to paper documents, electronic documents (including emails), audio or visual files, photographs, digital photographs, and microfilm.</p> <p>Record Copy. The copy of a record that is designated as the official document for retention purposes.</p> <p>Records Center. Approved by the Public Records Administration, a secure storage location for records that are no longer needed for daily business purposes but cannot be disposed of. Records at the Records Center are still considered to be in the University’s custody.</p>

	<p>Records Officer. Appointed by the University president and responsible for records management policies at a state agency.</p> <p>Records Custodian: Faculty, staff, and contractors of the University who create, maintain or distribute University records for business, administrative, or historic purposes.</p> <p>Records Retention Schedule. The minimum period of time for which Record copies must be retained.</p>
Statutes, Regulations, and Policies Governing or Necessitating This Policy	<p>R.I.G.L. 38 (Public Records), including R.I.G.L. §§ 38-2-1, et seq. (Access to Public Records Act)</p> <p>Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g, and implementing regulations at 34 C.F.R. Part 99</p> <p>Direct Grant Programs, 34 C.F.R. Part 75</p> <p>Federal Student Aid, 34 C.F.R. Part 668.24</p> <p>Office for Human Research Protections, 45 C.F.R. Part 46</p> <p>ISO 15489 – International Organization for Standardization, Records Management</p>
Reason for Policy / Purpose	To ensure compliance with federal and state legal statutes and records management best practices.
Forms Related to this Policy	<p>Records Inventory Form</p> <p>Digitization Preservation Plan Form</p>

Policy Statement

Records Management is a responsibility of the University as a whole. All employees are required to maintain the Records they create in accordance with records management requirements, regardless of format. This policy applies to both electronic and physical Records.

I. Roles and Responsibilities

A. Records Officer: is responsible for the University’s compliance with R.I.G.L. §§ 38-2-1, et seq. (Access to Public Records Act), 34 C.F.R. Part 99, 45 C.F.R. 46, and ISO 15489. The Records Officer is responsible for:

1. Maintaining a complete inventory of University records across all departments, to include the proper Records retention schedules, dates, and descriptions, as well as any other metadata that assists in organizing and retrieving Records in the immediate and distant future,
2. Applying legal or other holds to Records both on site and at the Records Center,
3. Approving the disposal of any Records,
4. Collaborating with the PRA to amend or create Records Retention Schedules as needed,
5. Processing and coordinating public records requests,

6. Providing training, guidance and resources to all departments throughout the University,
7. Obtaining and maintaining an Electronic Document Management System and/or digital archiving system, and
8. Approving document management software before purchase is made.

The Records Officer shall be the point of contact for the records storage vendor, the PRA, and any external inquiries regarding records management policies or procedures.

- B. Records Custodians:** Records custodians are responsible for providing information about the records in their care to the Records Officer when requested to do so, ensuring records management requirements are being followed within their business unit, and making the Records Officer aware of any changes or immediate issues.

II. Records Retention

Records will be retained at minimum in accordance with the Public Records Administration's Records Retention Schedules. A complete list of retention schedules is available upon request. Records may be kept past their retention period for good cause, such as future business purposes, ongoing assessment of historical value, legal proceedings, and amendments being made to the current retention schedule. The content of the Record determines its retention schedule, not the format.

- A. Records Retention Schedule Creation and Amendment:** Records retention schedules can be created and must be approved by the University Records Officer, University Office of General Counsel, the President of the University, the PRA, the Auditor General, and the Attorney General in order to take effect. Existing records retention schedules can be amended and the amendment must also be approved by the University Records Officer, University Office of General Counsel, the President of the University, the PRA, the Auditor General, and the Attorney General.
- B. APRA, Subpoenas, Legal Discovery:** All documents in the University's possession are subject to the Access to Public Records Act, subpoenas received by the University, and legal discovery or Requests for Production. If a record has met its retention requirements but has not been destroyed, that record must be assessed for responsiveness and if responsive, must be produced.

III. Records Storage

Electronic records must be stored in a document management system approved by the Records Officer for the entirety of their lifecycle. Physical Records, once no longer needed regularly for business purposes, must be stored off site at the Records Center until they have met their minimum retention period. No records shall be stored long-term in unsecured locations or destroyed in lieu of sending to storage or electronically archiving.

- A. Electronic Document Management System:** If the accompanying Procedures indicate that a centralized EDMS has been approved and designated by the Records Officer, then electronic Records must be stored in that approved centralized EDMS. In the absence of an approved centralized EDMS, electronic records will be stored in shared locations with access controls (e.g. Sharepoint, group OneDrive accounts, or shared drives) that are not tied to one person's account or employment with the University.
- B. Physical storage vendor:** Inactive Records must be sent to the Records Center following the procedure outlined in the accompanying Procedures.
- C. Permanent Records:** University records, both analog and digital, under a permanent records retention schedule may be transferred to the University Archives once their business value has been met. The

records are required to be inventoried and confidential or private information noted before transfer will be approved. University Archives may utilize the records center or store records on site in the Archive, depending on the needs of the University. Electronic records will be stored in a digital archive that meets the requirements for electronic records maintenance and access.

IV. Records Disposal

Records may not be disposed of without prior approval by the Records Officer and PRA. Records that do not fall under an approved Records Retention Schedule may not be disposed of until a Records Retention Schedule is identified for those Records.

- A. When Records Have Met Their Minimum Retention Periods:** Records will be destroyed when they have met their legal retention period, no longer serve a business or historical function, and are not under any other legal holds. Destroying Records before they have met their retention period is not permitted. If there is no applicable Records Retention Schedule for a Record, destruction is not permitted. A signed Certificate of Records Destruction form is required before destruction is authorized.
- B. In Cases of Emergency:** In the event of a disaster wherein Records are unintentionally destroyed, the records custodian must immediately inform the Records Officer so that a Certificate of Records Destruction can be submitted to the PRA.

V. Digitization of Records

Records that meet specific criteria may be digitized for ease of access, long-term electronic archiving, and/or to prevent further damage from handling. To replace a physical Record with an electronic Record, a digitization plan must be approved by the Records Officer and the PRA.

VI. Records Management Audits

The Records Officer has the right to audit a department’s records management software, physical storage and inventory to ensure descriptions are accurate, the proper retention schedules are applied to the Records, and that no illegal destruction has occurred.

Exceptions

None

Policy Review and Revisions

(Versions earlier than the first policy number may be paper only)

Policy #	Effective Date	Reason for Change	Changes to Policy
02.121.1		n/a	n/a