

Policy on Records Management

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	May 27, 2026
Next Review Date	No later than May 31, 2031
Who Needs to Know About this Policy	All of the following that create and receive Records while conducting business on behalf of the University from any location and in any format: all units of the University (e.g. departments, divisions, offices, colleges, etc.), all employees, and all persons or entities acting on behalf of the University.
Definitions <i>Defined terms and shorthand references are capitalized throughout.</i>	<p>Disposal (or “Destruction”). The final, irreversible disposition of a Record once its Records Retention Schedule has been met and it is not 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>Legal Hold. A directive by the University requiring the immediate suspension of Disposal or alteration of specified Records due to pending or reasonably anticipated litigation, audits, investigations, public records requests, subpoenas, or other legal or administrative action.</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 legal and business purposes, including 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</p>

	<p>cannot be disposed of. Records at the Records Center are still considered to be in the University's custody.</p> <p>Records Officer. The individual designated by the University as responsible for records management policies and practices at the University.</p> <p>Records Custodian: Anyone who creates, maintains, or distributes Records on behalf of the University for business, administrative, legal, or historical purposes.</p> <p>Records Retention Period ("Retention Period"). 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. Title 38 (Public Records), including R.I.G.L. §§ 38-2-1 to -16 (Access to Public Records Act) and R.I.G.L. §§ 38-3-1 to -10 (Public Records Administration).</p> <p>ISO 15489, International Standard for Records Management (International Organization for Standardization, 2016).</p>
Reason for Policy / Purpose	To ensure proper creation, preservation, retention, and Disposal of Records in compliance with federal and state laws 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 Records Custodians are required to maintain the Records they create or receive in accordance with records management requirements, regardless of format. This policy applies to both electronic and physical Records and includes the varying Federal and Rhode Island State records management requirements that apply to the University's records.

I. Roles and Responsibilities

A. Records Officer: is responsible for the University's compliance with federal and state laws impacting records management at the University. 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 must be kept past the Retention Period in the applicable Records retention schedule if a Legal Hold is in effect or if a longer Retention Period is dictated by applicable law, contractual requirements, or other University policy. Records may be kept past the Retention Period in the applicable Records retention schedule for good cause, such as future business purposes, ongoing assessment of historical value, 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, the University Office of the General Counsel, the President of the University, the PRA, the Rhode Island Auditor General, and the Rhode Island 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. Record Availability and Legal Obligations:** All University Records, regardless of format or location, may be subject to disclosure under applicable law, including the Access to Public Records Act, subpoenas, court orders, audits, investigations, and litigation discovery. If a Record has met its retention requirements but has not been destroyed, that record is still subject to disclosure and must be assessed for responsiveness, and if responsive, must be assessed for production by either OGC or the Records Officer.

III. Records Storage

Electronic records must be stored in a document management system approved by the Records Officer for the entirety of their lifecycle. Active physical Records may be stored on-site by the relevant business unit, and must be stored in ways that are organized and retrievable. Inactive 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 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.
- C. Improper Handling:** Improper handling or destruction of Records may result in potential liability for the University and/or subject the employee to disciplinary action.

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	May 27, 2026	n/a	n/a