

RECORDS MANAGEMENT POLICY

Policy # PR.002.2

Responsible President

Executive:

Responsible Office: University Libraries

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I. Policy Statement

University of Louisiana at Lafayette ("University") recognizes that the efficient management of its Records, regardless of their form or medium, is essential to support its core functions, to comply with its legal and regulatory obligations, and to contribute to the effective overall management of the institution. The University further recognizes that proper methods of Records disposal and the determination of what Records should be stored in the University Archives for permanent preservation are important responsibilities. The University is committed to maintaining an active Records Management program.

II. Policy Purpose

The University is required by Louisiana statute to maintain an active Records Management program to ensure that vital records are identified and maintained. The Louisiana Office of the Secretary of State, Division of Archives ("State Archives") has established policies and practices to assist state agencies in establishing and maintaining their Records Management programs.

Records relate to any form of media that is generated or received by Employees of the University and aligned to their duties. Records include Electronic Records, Education Records, and Health Records.

Records must be maintained and managed partly due to legal requirements. Further, there may be fiscal reasons for retaining Records (e.g., managing Records until an audit is completed). In the absence of legal and fiscal requirements, there may be administrative reasons that necessitate the maintenance and management of Records.

Records may be transferred to and maintained by the University Archives at the end of their useful administrative life due to their historical significance. All Records created by Employees who are appointed, established, or determined by the University are retained for as long as they are required to meet the legal, administrative, and operational requirements of the University, after which time they may

be either destroyed or transferred to the University Archives. The final disposition (either destruction or transfer to the University Archives) of Records is carried out according to approved Records Retention Schedules.

III. Applicability

This Policy applies to all Employees and to all University divisions and their individual units. This includes, but is not limited to, the Office of the President, the Athletics Department, the Office of Academic Affairs, Office of Research, Innovation, and Economic Development, the Office of Enrollment Management, the Office of University Advancement, the Office of Student Affairs, and the Office of Administration and Finance, and each of their respective individual departments and centers.

IV. Definitions

- 1. **Education Records:** are Records in any form that directly relate to a student and are maintained by the University or a person acting on behalf of the University and which must be maintained in compliance with the Family Educational Rights and Privacy Act ("FERPA"). Examples of Education Records include, but are not limited to, grades, transcripts, exams, quizzes, papers, projects, emails, course schedules, financial information, and disciplinary files.
- 2. <u>Electronic Records</u>: are Records created, generated, sent, communicated, received, or stored by electronic means. Examples include, but are not limited to emails, websites, databases, and word processing documents.
- 3. <u>Employees</u>: are all part-time and full-time faculty, staff, and administrators employed by the University.
- 4. <u>Health Records</u>: are Records in any form that are created or received by a health care provider, health plan, public health authority, employer, life insurer, school or university, or health care clearinghouse; and which relates to past, present, or future physical or mental health or condition of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual. These Records must be maintained in compliance with the Health Insurance Portability and Accountability Act ("HIPAA").
- 5. **Records:** are documents, papers, letters, books, drawings, maps, plats, photographs, magnetic or optical media, microfilm, microphotograph, motion picture film, or other document or any other material, regardless of physical form or characteristic, generated or received under law or in connection with the transaction of official business, or preserved by an agency or political subdivision because of other informational or legal value.
- 6. **Records Management:** is the systematic application of management techniques to the creation, utilization, maintenance, retention, preservation, and disposal of Records for the purpose of reducing costs and improving the efficiency of Records keeping.
- 7. <u>Records Management Officer</u>: is the Employee, designated by the University President, who handles Records Management concerns and acts as liaison to the Louisiana State Archives.
- 8. **Records Retention Schedule:** is an inventory of Records series maintained by each University unit used to identify, classify, and assign retention periods.

- 9. <u>Unit Liaison</u>: is the individual designated by their University unit's Vice President or Director to be responsible for their unit's Records Retention Schedule and work with the Records Management Officer in implementing the requirements of this Policy.
- 10. <u>University Archives</u>: is the designated repository for Records possessing historical or archival value to the University which must be retained permanently.

V. Policy Procedure

A. Managing Records

University units shall manage their Records in a trustworthy manner that ensures their authenticity. In order to do this, University units shall:

- 1. Create Records that accurately document their core activities;
- 2. Manage and store their Records in a manner that facilitates timely and accurate retrieval;
- 3. Ensure that Records are stored in secure locations and safe, stable environments;
- 4. Allow only those with the proper authority to have access to their Records; and
- 5. Know and comply with the State of Louisiana policies and the laws, regulations, standards, and professional ethics that affect the management of their Records.

B. Archiving of Record

Records found to possess historical or archival value to the University must be retained permanently in University Archives. Questions on historical or archival value should be directed to the Records Management Officer. University Archives in Edith Garland Dupré Library is the designated archives repository for the University. The Records Management Officer shall provide additional information on the process for submitting Records to University Archives. To transfer Records to University Archives, department heads for respective institutional units must fill out and sign University Libraries' Internal Transfer

(https://library.louisiana.edu/sites/library/files/Archives%20Internal%20Transfer%20Form%20-%20OpRvw%202021%2004%2009.pdf) and send it physically or electronically to the Head of Special Collections.

C. Records Retention Schedules

Unit Liaisons will work directly with the Records Management Officer to develop, revise, and maintain their unit Records Retention Schedule. The SSARC-932 Records Retention Schedule Form ("SSARC-932") from the Louisiana State Archives (https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-932.doc) shall be used by each University unit as a template to identify, classify, and assign a retention period for each series of its Records. Because the University is a diverse agency, Records Retention Schedules may differ greatly from one University unit to another.

Unit Liaisons shall complete an accurate SSARC-932 in accordance with form instructions. Once Unit Liaisons have completed the SSARC-932 for their units, they shall present the Records Retention Schedule to their Department Head, Dean, and Vice President for approval. Upon approval, the Unit Liaison shall submit the SSARC-932 electronically to the Records Management Officer, who will confirm approval via email. All approvals will be noted through email correspondence. Upon receipt, the Records

Management Officer will send the Records Retention Schedule to the State Archives for approval. The State Archives will send back corrections or suggestions, and then ask for an approval signature, which will be provided by the Records Management Officer. The Records Management Officer will send the signed Records Retention Schedule back to the State Archives, who will provide their own approval signature, therefore activating the Records Retention Schedule. Upon notification of approval by the State Archives, the Records Management Officer will provide approved copies of the Records Retention Schedules to each respective University unit for their Records.

University units shall review their current Records Retention Schedule at least once a year, and the Records Retention Schedule must be amended when necessary, such as when additional Records are discovered or when Records no longer apply. Records Retention Schedules are valid for five (5) years from the date of State Archives approval and must be renewed within ninety (90) days of the expiration date. The Records Management Officer will work with the Office of Communications and Marketing near the end of the fiscal year to send out reminders to the University to perform the review of their current Records Retention Schedule. A spreadsheet will be made available to each Unit Liaison through OneDrive where they must electronically sign their name next to their unit. This indicates that they have reviewed their unit's Records Retention Schedule. The Unit Liaison will also indicate that either a) their unit has no amendments, or b) their unit has made amendments and will send their most recent Records Retention Schedule to the Records Management Officer before the end of the fiscal year.

D. Disposal of Records

Employees may not dispose of Records without the approval of both the Records Management Officer and the State Archives. Each University unit must use an SSARC-930 Disposal Request Form ("SSARC-930") (https://www.sos.la.gov/HistoricalResources/PublishedDocuments/SSARC-930.pdf) to request permission to dispose of Records. Authorization is required even if the Records in question appear on an approved Records Retention Schedule. Records that are either confidential or sensitive (i.e., student records, personnel files, Records with personally identifiable information) must be disposed of in a manner that will maintain confidentiality.

Once Unit Liaisons have completed the SSARC-930 for their units, they shall present the Disposal Request Form to their Department Head, Dean, and Vice President for approval. Upon approval, they shall submit the SSARC-930 electronically to the Records Management Officer, who will confirm approval via email. All approvals will be noted through email correspondence. Upon receipt, the Records Management Officer will sign the SSARC-930 and send it to the State Archives for approval. Upon notification of approval by the State Archives, the Records Management Officer will provide approved copies of the SSARC-930 to University units for their Records.

Once approval for disposal has been granted, the University unit shall dispose of the Records in a manner acceptable to the level of confidentiality the record requires. This can be accomplished by shredding. Electronic records shall be destroyed both physically and digitally. Electronic records on physical storage (i.e., flash drive, CD) can be destroyed through shredding and degaussing. Records on digital storage should be destroyed through multiple overwrites. University units shall document the destruction of their Records by maintaining a certificate of destruction using SSARC-933 Certificate of Destruction Form (https://www.sos.la.gov/HistoricalResources/PublishedDocuments/SSARC-933.pdf) for all Records requiring destruction approval from State Archives.

VI. Enforcement

This Policy will be enforced by the President. Those who violate this Policy may result in sanctions which may include, but not be limited to, disciplinary action up to termination of employment, as may be

determined by the Vice President that an individual reports in consultation with the Office of Human Resources.

VII. Policy Management

Upon adoption, the President shall be the Responsible Executive for this Policy in charge of the management of this Policy. The Dean of University Libraries shall be the Responsible Officer for this Policy. University Libraries shall be the Responsible Office for this Policy.

VIII. Exclusions

There are no exclusions to this Policy.

IX. Effective Date

This Policy shall be effective as of the date of adoption of this Policy.

X. Adoption

This Policy is hereby adopted on this July 26, 2022.

__/s/ Dr. E. Joseph Savoie____

Dr. E. Joseph Savoie President

XI. Appendices, References and Related Materials

- Louisiana Public Records Law, Louisiana Revised Statutes 44:1 et seg.
- Louisiana Uniform Electronic Transactions Act, Louisiana Revised Statutes 9:2601 et seq.
- Louisiana Administrative Code Title 4, Part XVII
- University of Louisiana System Policy Number: M-17
- Sec. 1171(4)(a) of Health Insurance Portability and Accountability Act, Title 11 42 U.S.C. 1320d
- Louisiana Secretary of State Website
- SSARC-930 Disposal Request Form
- ❖ SSARC-932 Records Retention Schedule Form

XII. Revision History

- Adoption of Records Management Policy: July 26, 2022 (PR.002.1).
- PR.002.2: On August 5, 2024, the Policy was updated to include minor insubstantial update to the Record Management Officer.