1. Introduction

This Policy seeks to ensure that RIT Records, especially those that are required for compliance with the law, are retained for a sufficient period of time. In addition, this Policy seeks to ensure that RIT Records which document the history of RIT are preserved.

This Policy should be read together with the other policies of RIT. RIT’s policies are available online at www.rit.edu/policies. The electronic version of this Policy will, from time to time, contain “Frequently Asked Questions” which interpret and detail the applicability of the Policy to various practical situations.

2. Effective Date

This Policy will be effective on May 13, 2009 (“Effective Date”). It will apply to all divisions, departments and academic units of RIT.

3. Definitions

Terms not otherwise defined herein have the meanings listed below.

A. **Active Record** means a record with current administrative use for the division, department, or academic unit that created it. Records remain active for varying numbers of years, depending on the purpose for which they were created.

B. **Archival Record** means a record that is inactive, not required to be retained in the office in which it originated or was received, and has permanent or historic value. Archival records are retained and preserved indefinitely in the University archives.

C. **Hold Notice** means a communication issued by the Office of Legal Affairs as a result of a current or anticipated government regulation, investigation, litigation or other matter that warrants the suspension of this Policy.

D. **Record** means any document, communication, or similar item generated or received by RIT, by RIT personnel, or on RIT’s behalf.

E. **Official Repository** means the division, department, or academic unit designated as having responsibility for retention, timely destruction of particular types of official University records, or forwarding to RIT Archives. Such responsibility is assigned to the division, department, or academic unit’s vice president, director, dean, or designee.
F. **RIT Archives** means a department of the RIT Wallace Library that promotes knowledge and understanding of the University’s origin, aims, programs, and goals; and facilitates effective record management.

G. **RIT Record** means the original or copy of any record which must be held for official business or regulatory purposes in accordance with the university’s Records Retention Schedule. RIT Records do not include records that are not created in the official course of business, serve no legitimate or necessary business purpose, or are created for personal purposes only.

H. **Personnel** means all RIT staff and faculty, full-time and part-time, including student employees acting within their scope of employment, non-employee consultants, visitors, adjuncts and others using university resources.

I. **Scope of Employment** means all activities related to the employment responsibilities of personnel.

J. **Confidential Record** means a record that contains personal information protected from disclosure by law or RIT policy.

K. **Electronic Record** means a record maintained on a RIT network, email server, back-up tape, CD-ROM, hard drive, or data storage location.

L. **Student Employee** means students, who are also RIT employees, acting within the scope of employment.

M. **General Correspondence** means emails, letters, or notes received in the course of business that is directly related to the mission of a particular department, division, or academic units.

### 4. General Provisions

**A. Purpose**

The purpose of this Policy is to require consistent treatment of Records. This Policy is intended to ensure that RIT meets legal standards, preserves RIT’s history, and destroys outdated and useless records.

**B. Scope**

All personnel shall comply with this Policy, as amended from time to time. This Policy is considered part of the conditions of employment for RIT personnel.

**C. Management of University Records**

Divisions, departments, or academic units that are Official Repositories for RIT Records are responsible for establishing appropriate records retention management practices. Each division, department, or academic unit’s vice president, director, dean, or designee must:
1. Implement the division, department, or academic unit’s record management practices;
2. Identify a records custodian for the division, department, or academic unit with responsibility to ensure that these record management practices are consistent with this Policy;
3. Educate staff within the division, department, or academic unit in understanding the record management practices;
4. Preserve inactive records of historic value and transfer those records to the RIT Archives;
5. Ensure that access to confidential files is restricted; and
6. Destroy inactive records that have no archival value upon passage of the applicable retention period by the Office of Legal Affairs.

D. Suspension of Policy / Legal Holds. This Policy may be suspended for any Record due to a requirement by a consent order, private or governmental contract, pending or anticipated litigation, investigation, or audit requirement. Such suspension supersedes the requirements listed in this Policy and shall be made by the Office of Legal Affairs, which has the authority to suspend and revise any retention schedule. The Office of Legal Affairs will implement such a suspension by sending out a Hold Notice for relevant records to affected divisions, departments, or academic units. This Hold Notice shall be in effect until rescinded by the Office of Legal Affairs.

5. Implementing Record Management Practices

A. Retaining of Records. In establishing appropriate record management practices, each division, department, or academic unit’s vice president, director, dean or designee will be responsible for setting up a process for the identification of RIT. In addition, in connection with setting up record management procedures, the following should be considered and incorporated:

1. Archival Records. Generally, Records which document the history of administration, academic programs, and the social and cultural life of RIT should be preserved. To decide if the RIT records are of historic value, consult the RIT Archivist, who has the authority to designate which records are Archival Records.
2. Electronic Records. The retention and preservation of electronic records shall be in accordance with this Policy. If an electronic record falls within one of the retention schedule’s categories of records, then the record must be treated the same way as a similar hard copy record.
3. Email. In considering the nature of email for retention purposes, an email and its attachments should be considered as a whole. If one retention period applies to an email and a different retention period applies to the email attachment(s), the entire email with attachment(s) should be retained for the longer of the two retention periods. If a person is merely copied on an email (either listed as a “cc” or “bcc”), he/she should treat the document as a duplicate in accordance with sub section 5 below.
4. Disaster Recovery. Electronic records maintained by the Information Technology Services
ITS) for disaster recovery and backup purposes only shall be retained and preserved by ITS in accordance with a uniform rotation schedule. This uniform rotation schedule shall require that no ITS backup of electronic records shall be maintained for longer than thirty (30) days.

5. **Duplicates.** Generally, only one copy of each record shall be retained. A duplicate is an exact replica of the original and shall be destroyed as soon as it does not serve a legitimate business purpose and as long as is not subject to a Hold Notice indicating otherwise. Prior drafts, revisions, or original documents that have additional hand written notes are not considered duplicates of the original and shall be subject to the same requirements as an original record.

B. **Destruction of Records.** Records that are neither Active Records, Archival Records, RIT Records, nor the subject of a Hold Notice should not be maintained. In addition, when the required retention period for RIT Records has passed, a determination of whether to preserve the record as an Archival Record or to dispose of the record must be made. The division, department, or academic unit’s vice president, director, dean, or designee should make this determination, in consultation with the RIT Archivist. The division, department, or academic unit’s vice president, director, dean, or designee shall certify annually in writing to the Office of Legal Affairs that compliance with this policy has been achieved for the prior academic year.

C. **Using the Retention Management Schedule.** Divisions, departments, or academic units may establish their own records management policy, with the approval of the Office of Legal Affairs, to determine the retention period for the Records created and/or kept in their respective areas. Current retention schedules for RIT divisions are located on the Office of Legal Affairs website.

1. If two or more categories with different retention periods are applicable to a record, the record shall be retained for the longest applicable retention period.

2. Records required to be destroyed must not be destroyed before the prescribed retention period has expired. Records that are required to be destroyed and are subject to specific retention periods shall be destroyed within a reasonable period of time following the expiration of the retention period unless subject to a Hold Notice.

3. The default retention period for records whose retention period has not been specifically determined shall be six (6) years.

D. **Exceptions.** Requests for exceptions to this Policy should be granted rarely and only with good cause. Requests for exceptions to this Policy should be submitted to the Office of Legal Affairs.

E. **Training.** Each division, department, or academic unit’s designee or records custodian will be responsible for ensuring their personnel are informed of the Policy and procedures established pursuant to the Records Management Program and devising the appropriate training to ensure appropriate implementation.
Please refer to the Office of Legal Affairs website for the official current retention schedules governing each RIT division.

**Responsible Office:**
Office of Legal Affairs

**Effective Date:**
Approved May 13, 2009

**Policy History:**
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Edited September 2012 (conversion edit)