



## 2.6.010

# Records Management Policy

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Date of last board of trustees review: March 13, 2024

The originator of this policy is Risk Management. Questions regarding this policy may be directed to the originator by calling 801-957-4533.

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## 1. Policy

Salt Lake Community College creates various types of records in conducting business to achieve its mission and goals. The college's policy is that such records will be maintained, stored, and released according to applicable state and federal laws.

## 2. References

- A. Retention Requirements for Record, 2 C.F.R. § 200.334.
- B. Records, 26 C.F.R. §1.6001-1.
- C. Electronic Records in Government Agencies, Utah Code Ann. §§ 46-4-501–503.
- D. Public Records Management Act, Utah Code Ann. §§ 63A-12-101–113.
- E. Government Records Access and Management Act (GRAMA), Utah Code Ann. §§ 63G-2-101–901.

## 2.6.010

# Records Management Procedure

Date of last executive cabinet review: October 31, 2023

The originator of this procedure is Risk Management. Questions regarding this procedure may be directed to the originator by calling 801-957-4533.

## 3. Definitions

- A. **Classification:** determining whether a record series, record, or information within a record is public, private, controlled, or protected.
- B. **College Administrator:** the president, all vice presidents and everyone who reports directly to a vice president (excluding administrative assistants), associate and assistant vice presidents, the provost, associate and assistant provosts, deans and assistant deans. College Administrators' correspondence is subject to the records retention schedule for state agency executive correspondence ([GRS-1758](#)).
- C. **College Archives:** a unit of Library Services that conserves college archival records.
- D. **Department:** any administrative subunit of the college.
- E. **Digitization:** the process of converting a hard-copy record into a digital format.
- F. **Electronic Record:** information created, generated, sent, communicated, received, or restored by electronic means.
- G. **Hard-Copy Record:** any record not in an electronic format.
- H. **Litigation Hold:** a written communication issued due to current or anticipated litigation, audit, government investigation, or other similar matter that suspends the normal process regarding the retention and disposition of college records.
- I. **Official Record:** a record maintained by either the creating office or another office.
- J. **Official Repository:** the department responsible for retaining and disposing of official college records.
- K. **Record:** a book, letter, document, paper, map, plan, photograph, film, card, tape, recording, electronic data, or other documentary material, regardless of physical form

or characteristics, that is prepared, owned, received, or retained by the college. Records document departments' operations and functions.

- L. **Records Custodian:** an employee designated by a vice president or the vice president's designee with specific responsibility for records management within a department.
- M. **Records Officer:** the individual appointed by the president or designee to work with state archives in the care, maintenance, scheduling, designation, classification, disposal, and preservation of records.
- N. **Record Series:** a group of records that may be treated as a unit for purposes of designation, description, management, or disposition.
- O. **Retention Period:** the minimum length of time that the college must maintain a record, as required by federal or state law.
- P. **Retention Schedule:** a document that describes categories of records, the category's retention period, and instructions for final disposition.
- Q. **State Archives:** the State of Utah Division of Archive and Records Service.
- R. **Unofficial Copies:** a duplicate or working copy of an official record created for ease of access and use.

#### **4. Procedures**

##### **A. Ownership and Custody of College Records**

1. All college records are the property of Salt Lake Community College.
2. Records the college transfers to the Utah State Records Center remain the college's property.
3. Records the college transfers to the Utah Division of Archives and Records Service become the State's property.

##### **B. GRAMA Requests**

1. Utah law allows the public to request records from a government entity under the Government Records Access and Management Act ("GRAMA").
2. The college must respond to GRAMA requests it receives.
3. When responding to a GRAMA request, the college's records officer will coordinate with departments to obtain records responsive to the request.

##### **C. Records Officer**

1. The records officer oversees and coordinates the college's records management

program.

2. The president or their designee must appoint an employee to be the college's records officer.
3. The records officer must complete annual training and certification through the state archives.

#### D. Creation and Storage of College Records

1. Departments must ensure proper storage, access, and maintenance of their records.
2. The official repository must retain records for the retention period appropriate for each record type.
3. The record retention period is determined by:
  - a. the retention schedule set by the Division of Archives and Records Services and;
  - b. other applicable laws and statutes.
4. The college does not require non-repository departments to keep a record copy. However, a department may retain an unofficial record copy for convenience.

#### E. Records Custodian

1. Each vice president or their designee must designate a records custodian for each department in their respective division.
2. Records custodians implement the records management program for their departments.

#### F. Electronic Records

1. General
  - a. Each department must develop a procedure for electronic records storage that adheres to the Information Security Technology policy.
  - b. Depending on the system and department, college systems may retain backups after files are deleted.
  - c. Departments that store records classified as private, controlled, or protected on a portable or external storage device must store such records so only authorized persons can access them.
2. Email
  - a. College employees must preserve emails following established records

retention schedules.

- b. Per the state retention schedule, correspondence of college administrators, including emails, are permanent records and will be transferred to the state archives at the end of their retention period.

#### G. Converting Hard-Copy Records to Electronic Records

1. A department may store a hard-copy record electronically by digitizing the record.
2. When a department digitizes paper records, the department must follow a procedure that:
  - a. adheres to the [Information Security policy](#);
  - b. maintains the integrity of the original records;
  - c. tracks changes made to the electronic records; and
  - d. captures required metadata.

#### H. College Archives

1. Designation and Transfer of Records
  - a. Departments may transfer duplicate copies of records that have historical value to the institution to the college archives at the end of their retention period.
  - b. The college archivist will review and determine if donated copies will become a part of the college archives, per the archivist's discretion and archives policy and procedures.
2. Records in the college archives will be accessible per established archives policy and procedure.

#### I. Record Disposal

1. When a record has reached the end of its retention period, the records custodian shall destroy or transfer the record according to the retention schedule. The college records officer can provide information on retention schedules.
2. Destruction of Records
  - a. The department head must approve the destruction of records.
  - b. Before destruction, the records custodian must create a written log of destroyed college records.
  - c. Method of Destruction

(1) Paper records

- (a) The college has a contract service to assist college departments with the destruction of college records.
- (b) Alternatively, a records custodian must shred, using a crosscut shredder, and recycle paper records.

(2) Electronic Records

Electronic records may be:

- (a) deleted;
- (b) overwritten by software designed for this purpose;
- (c) degaussed using a magnetic field to scramble the data; or
- (d) physically destroyed and discarded if the records were stored on a media device such as magnetic tapes, CDs, or DVDs.

3. Transferring Records

For permanent records, the records custodian will:

- a. coordinate with the college's records officer to transfer records with an extended retention period to the State Records Center and permanent records to the state archives; or
- b. coordinate with the college's archivist to transfer duplicate copies to the college archives.

J. Litigation Holds

- 1. A litigation hold requires preserving records when litigation or a government investigation is pending, imminent, or reasonably foreseeable.
- 2. Only the college's legal office or the State Attorney General's office may issue a written litigation hold.
- 3. The recipient of a litigation hold must immediately locate, index, segregate, and protect all records identified in the legal hold.
- 4. A records custodian determining whether a record is relevant to a legal hold must protect the record until the custodian consults with the legal office.
- 5. A litigation hold remains effective until it is released in writing by the college's legal office or the State Attorney General's office.
- 6. When a records custodian receives a written notice that the litigation hold is

released, the records custodian shall return all records to their standard handling procedures and retention schedules.

**K. Records Management Guidance Document**

Maintained by the records officer, the [Records Management Guidance Document](#) provides additional support and guidance for records custodians.