Section I: Introduction

NDSU’s teaching, research and outreach mission depends upon the effective and efficient management of information assets and resources.

- Records exist in a wide variety of storage formats.
- Records are increasingly digital and linked to information technologies.
- State and federal laws impact how the information is managed.

This records management annual training outlines basic principles, responsibilities and resources for the management of records and information.

Why do records matter?

Records are kept to meet legal, administrative, professional, fiscal/audit, historical and research requirements; they represent what an organization does:

- Records provide evidence of transactions
- Records support the decision making process
- Records document university programs and activities
- Records can be resources for future historical research
- Records provide accountability and transparency for the business, research and education at NDSU

Records must be managed according to best practices and in compliance with all applicable laws, policies and procedures.

Why are records management best practices important?

Records management standards and best practices:

- ensure that records are true and complete
- provide confidentiality and protection where needed
- make records available to those with rightful access
- ensure that compliance requirements are met

When records management standards and best practices are followed, the university is in compliance with state law, and N.D. University System and NDSU policies and procedures.
Who is ultimately responsible for records management at NDSU?

You are responsible for managing NDSU records according to identified standards, best practices and requirements, if you:

- create, disseminate, store, manage, destroy and/or have access to NDSU records of any type, classification or description
- are an NDSU employee and/or student who has access to records
- are an external entity, such as a vendor whose purpose may be to provide storage space or destruction services for records

We each play an important role in the correct management of NDSU records under our custody.

NDSU Records Management Program objectives

NDSU’s Records Management Program serves to organize and guide efficient and compliant management of the university’s records. The program’s objectives are to:

- provide the NDSU community assistance and guidance with managing records throughout their life cycle - from creation or receipt, during use, through the maintenance stage and at final disposal.
- help assure that records produced in the course of university business adhere to federal and state laws and regulations including access, storage, retention and disposal.

NDSU Records Management Program goals

Meeting the objectives of NDSU’s Records Management Program depends on the achievement of the program’s three major goals:

- consistent and cohesive management
- strong security
- privacy practices

These goals are accomplished through a coordinated approach, dedication of necessary resources, and the provision of support and assistance for and by all who manage records.

NDSU Records Management Program scope

NDSU Records Management Program guidelines and requirements follow relevant federal and state laws and apply to all university records and information, regardless of format.

Guidance and recommendations on management and disposal of email records is provided at www.ndsu.edu/recordsmanagement/training.
NDSU Records Management Program responsibilities

The administrators of NDSU’s Records Management Program are responsible for the program’s implementation within the campus community. The program is under the purview of the Vice President of Information Technology.

NDSU Records Management Program governance, oversight and coordination

Governance, oversight and coordination of NDSU’s Records Management Program are provided by individuals and groups that follow the stipulations of pertinent laws, policies and procedures.

1. NDSU Records Management Advisory Committee:
   with representation by faculty, students and staff, this group is responsible for records management policy, standards, guidelines, processes and procedures

2. NDSU Unit Records Coordinators (URCs):
   • provide assistance and oversight to faculty, staff and administrators in their units for management and disposal of their records in compliance with federal, state and institutional requirements
   • submit their units’ records disposal data to NDSU’s Records Management leadership

3. NDSU Records Management leadership:
   coordinates retention, preservation and destruction processes for university records in accordance with policy, procedures and practices

4. NDSU policies and procedures

5. N.D. University System (NDUS) policies and procedures

6. State and federal laws

Section II: Applicable policies, procedures and laws

NDSU’s records management standards, guidelines and procedures must adhere to applicable policies, procedures and laws. Available at www.ndsu.edu/recordsmanagement/resources/, these policies, procedures and laws include, but are not necessarily limited to:

- North Dakota Century Code 54-46, Records Management
- North Dakota Century Code 44-04, Duties, Records, and Meetings
- NDUS Policy 1912, Public Records
- NDUS Procedure 1901.2.1, Data Classification and Information Security Standard
- NDUS Procedure 1912.1, Information Security Procedures
• NDUS Procedure 1912.2, Student Records - Directory Information
• NDUS Procedure 1912.3 Employee Personal Information
• NDSU Policy 713, Records Management
• NDSU Policy 713.1 Litigation Hold (as of 7/16/18, this policy is in the process of being updated)
• NDSU Policy 718 Public/Open/Confidential Records

**Data definitions per NDUS 1901.2.1, Data Classification & Information Security Standard**

- “Restricted” data requires the highest level of protection. It is data protected by federal or state laws, regulations, contracts, or policy.
  *Examples of restricted data: debit or credit card data; export controlled data; name and Social Security Number; health information*

- “Private” data should not be available to the public. It is data that may be protected by federal or state laws, regulations, contracts, or policy. This data requires protection, but not at the same level as "Restricted" data.
  *Examples of private data: gender; trade secrets and intellectual property; citizenship; ethnicity; student or Employee ID number*

- “Public” data can generally be released to the public. It typically requires minimal protection.
  *Examples of public data: budgets; salary; meeting agendas and minutes; job titles and descriptions; existence and status of complaints; expense reimbursements*


**Section III: Identification of Records**

The protection levels, availability requirements and disposition methods of records vary depending on the information they contain. For records to be properly managed, they must be first identified.

**How do I determine if it is a record?**

If it is work in a tangible format such as paper, digital, video, audio, and/or a combination of formats created on behalf of the university, it is considered to be a record. The information or substance contained within the format is one of the keys for determining if it is or is not a record.

To determine if something is a record, ask these questions:
• Is the material related to the duties of my job description or to the department in which I work?
• Am I, or is my department, on behalf of NDSU, the creator or the recipient of the material?
• Is this the official version of the record?
• Was the record created in the course of university business (correspondence, agreement, study, spreadsheets, completed forms, etc.)?
• Was it received for action (e.g., invoice requiring payment)?
• Does it document university activities and actions (calendar, meeting minutes, agenda, project record, etc.)?
• Is it mandated by statute or regulation (administrative record, legal/financial record, human resources document, student information, etc.)?
• Does it support financial obligations or legal claims (contract, grant, litigation case file, etc.)?
• Does it communicate organizational requirements (guidance document, policy, procedure, etc.)?

If you are still unsure whether or not the material in question is a record, please contact your URC; if you are a URC, please contact the Records Management leadership at NDSU.recordsmanagement@ndsu.edu.

**Things not considered to be a record**

There are materials that do not fit the definition of “record.” Examples include:

• copyrights
• patents
• bequests
• published materials available for sale or available at a public library
• materials prepared for your use by your supervisor
• notices and invitations received by a department that are not solicited by the department
• materials not related to any official action of the department
• routing slips or envelopes
• personal property belonging to an employee or student
• duplicates or convenience copies
• materials that have no relation to the business of the department

Items not considered to be NDSU records must be removed from NDSU business tools such as computers and file systems as soon as possible and on an ongoing basis.

To determine that something is not a record, ask these questions:

• Is it reference material (vendor catalog, phone book, technical journal, etc.)?
• Is it a convenience copy (duplicate copy of correspondence, memo, directive, etc.)?
• Is it a stock copy (organizational publication, blank form, etc.)?
• Is it a draft or working copy (draft with no substantive comments, rough note, calculation, etc.)?

*Please note that some drafts are needed to support a decision trail or are a requirement according to the Records Retention Schedule.*

**Duplicate and/or Convenience Copies**

A “Record” does not include duplicate/convenience copies of materials.

A document is a duplicate/convenience copy if it is a copy of the original document, with the original being under the custody of the Office of Record Retention.

A duplicate/convenience copy must be protected and stored in the manner identified for the original in the Records Retention Schedule.

Guidelines for the retention and disposal of duplicates/convenience copies are as follows:

• A duplicate/convenience copy should only be kept as long as it is needed and then it must be disposed of in the method specified for the original in the Records Retention Schedule.
• A duplicate/convenience copy may be disposed of any time prior to the expiration of the retention period specified for the original in the Records Retention Schedule.
• Disposal of duplicate/convenience copies should not be included in records disposal reports.

**Email and Text Messages as Records**

Email and text messages may fit the definition of “Record,” as outlined above, depending on their substance and purpose.

Emails and texts sent and received must be retained and disposed of according to the Record Series associated with their content.

For example, an email message related to an invoice for goods ordered and received would be associated with the Record Series that is applicable to that invoice, and it must be stored in the same file as the invoice, retained for the same time frame and disposed of according to the disposal method specified for that Record Series.

**Section IV: Life Cycle of a Record**

The Life Cycle of a Record is initiated by the creation or receipt of the record by the university employee, student and/or department. After creation or receipt, the record undergoes a period of active use for the completion of business activities on behalf of NDSU. When that purpose has been accomplished, the record becomes inactive and must be filed/stored for the retention period
identified in the Records Retention Schedule. When the retention period for the record has concluded, the record is to be disposed of as designated in the Records Retention Schedule.

Section V: The Records Management Process

NDSU uses an established process for managing records during each step of their life cycle to ensure their protection and accessibility, as well as compliance with the laws, policies and procedures that are relevant to specific types of records.

What is a Records Retention Schedule?

A Records Retention Schedule is a critical component of an effective records management program. It is a legal document developed to:

- provide direction on how long records are to be retained in active file systems and inactive storage
- identify records which have important historical or archival value and insure their protection and long-term maintenance
- promote efficiency in records processing, distribution and storage
- eliminate maintenance of duplicate records
- ensure access to public records

The Records Retention Schedule offers a comprehensive snapshot of what must be taken into account when determining the appropriate type of management for each type of record.
Records Retention Schedules used at NDSU

The N.D. University System and NDSU-specific Records Retention Schedules are approved by the North Dakota Public Records Board and managed by the North Dakota Records Management Department under the leadership of the North Dakota Information Technology Department.

- The N.D. University System Records Retention Schedule applies to records used by all North Dakota colleges and universities.
- The NDSU-specific Records Retention Schedule contains record series specific to NDSU.
- These schedules can be found at https://www.ndsu.edu/recordsmanagement/records_retention_schedule/
- Supplemental information on Extension records is available on NDSU’s Records Management website.

How to identify a record in the Records Retention Schedule

The first thing you need to do for every type of record you are managing, is to identify its Record Category Number, which will lead you to the remaining components of that record’s management, retention and disposal requirements. This identification can be made following the instructions at https://www.ndsu.edu/recordsmanagement/records_retention_schedule/.

Disposition of Records

All NDSU employees and students who manage records are responsible to:

- review the records for which they are responsible on an annual basis
- barring the applicability of a litigation hold, dispose of records which have reached the end of their retention period according to the Records Retention Schedule and report such disposal to their URC
- report new programs and/or records to their URC

Records disposal: timeline

Records may not be disposed of prior to the end-of-life-cycle time stipulated in the Records Retention Schedule for the applicable Record Series.

Records disposal: step by step

When you have identified those records that require disposal, such disposal must be documented and reported.

- Use the “NDSU Disposal Form for Employees” and submit that form to your URC
- The disposal form is located at https://www.ndsu.edu/recordsmanagement/disposal_resources/ and documents that
classification and disposal method of the records included in the report are in accordance with the Records Retention Schedule

Records disposal: archival

Transfers to NDSU Archives are coordinated by the URCs, using an established process for transferring the records whose disposal method is “archive” according to the Records Retention Schedule, when they have reached the end of their life cycle.

Records disposal: exception for litigation, audit or open records request

Records involved in an ongoing audit, open records request, pending or reasonably foreseeable litigation, or investigation must not be destroyed until notification has been received that all legal or audit action has concluded.

If you have questions or concerns, please contact your URC.

Records disposal: wrongful destruction or removal

If you find that records within your department have been wrongfully destroyed, removed or tampered with, please contact your URC.

Section VI: Conclusion

Understanding and following records management responsibilities results in:

• improved day-to-day management of NDSU records and information
• assurance of systematic retention and disposition of university information resources.

Benefits of appropriate records management include, but are not limited to:

• compliance with federal and state laws and N.D. University System and NDSU policies and procedures
• reduction of liability risks
• easy retrieval of records when needed
• lesser volume of records stored
• efficient records storage and retrieval systems
• improved office operations
• lower costs of equipment, supplies, space and personnel
• protected vital records
• improved customer service

If you would like more information on records management or have questions concerning records for which you are responsible, please contact one of the following:
• NDSU’s Records Management:
  
  Leadership: ndsu.recordsmanagement@ndsu.edu
  Wendy McCrory: Wendy.McCrory@ndsu.edu
  CeCe Rohwedder: CeCe.Rohwedder@ndsu.edu

• NDSU Extension Service:
  
  Jim Gray: Jim.Gray@ndsu.edu