

IMPLEMENTING PROCEDURES FOR RECORDS MANAGEMENT POLICY

I. Introduction and Purpose

Consistent with the [Records Management Policy](#), schools and divisions that maintain University Records¹ are responsible for establishing appropriate records management procedures. The university has established a [record retention and disposition schedule](#), attached as Appendix A, that sets limits on how long different categories of University Records are to be retained by schools and divisions before Disposal (“[University Records Schedule](#)”) or transfer to the University Archives. The Retention Periods specified in the [University Records Schedule](#) are derived from applicable legal, regulatory, accreditation, and other standards, including recommended best practices.

II. Procedures

A. Conducting a Records Survey

Schools and divisions should conduct a Records Survey by creating an inventory of all categories of documents maintained by the school and division, including those in paper, electronic, or any other format. To conduct the Records Survey, schools and divisions should do the following:

1. Make a list of all categories of records created and maintained by the school or division;
2. Determine whether records contain Public Information, Regulated Information, or Restricted Information, as defined in the [Information Security Policy](#). Schools and divisions must inventory and report certain types of Regulated Information in their custody in accordance with the [Implementing Procedures for the Information Security Policy to Report Regulated Information to the Compliance and Privacy Office](#);
3. Distinguish any University Records the school or division is required to retain under a Litigation Hold and note any documents that may otherwise be the subject of a claim, audit, agency charge, investigation, or enforcement action that has been identified; and

¹ Defined terms are capitalized. Definitions are provided in Section IV.

4. Distinguish any University Records the school or division should offer to the University Archives before Disposal because they have historical or administrative value.

For assistance with the Records Survey, schools and divisions may contact the University Archives, the Compliance and Privacy Office, or the Division of Information Technology (“DIT”). For assistance determining whether University Records have long-term historical or administrative value to the university, schools and divisions should contact the University Archives. Schools and divisions should review their Records Survey on an annual basis to identify any material changes.

B. Establishing Records Management Procedures

Based on the Records Survey, schools and divisions must establish appropriate records management procedures in accordance with the established University Records Schedule. Consider such factors as:

1. Who will be responsible (by position, rather than named employee) for implementing the [University Records Schedule](#). This should be an individual in a position with sufficient knowledge and understanding of the operations and business needs of the school or division;
2. Whether paper documents will be retained, sent to storage, or scanned into an electronic data management system;²
3. Whether University Records are of long-term historical or administrative value to the university and, if so or if there is any uncertainty, contact the University Archives; and
4. How University Records will be disposed of, making sure that University Records containing Regulated or Restricted Information are shredded prior to Disposal as appropriate.

Each school and division must have its records management procedures reviewed and approved by the Compliance and Privacy Office, which will consult with the Office of the Senior Vice President and General Counsel (“OGC”), DIT, and the University Archives. If a school or division wishes to

² Before implementing an electronic data management system, schools or divisions should consult with DIT and/or the University Archives.

make any substantive changes to its approved records management procedures, the school or division should contact the Compliance and Privacy Office to review and approve the changes.

C. Implementing the University Records Schedule

1. *Records listed on the University Records Schedule*

University Records maintained by schools and divisions falling within the [University Records Schedule](#) must be retained for not less than the minimum Retention Period specified for that category of record. At the conclusion of the Retention Period, the University Records must be destroyed, unless (i) OGC authorizes an exception, (ii) the applicable records are subject to a Litigation Hold, or (iii) the applicable records are transferred to the University Archives due to their historical or administrative value to the university. In the event of a Litigation Hold, the applicable University Records shall be maintained through the final resolution of the Litigation Hold as determined by OGC. After the Litigation Hold is released, the appropriate Retention Period for the University Records will apply.

2. *Records not listed on the University Records Schedule*

If there is a category of University Records maintained by a school or division that is not listed on the [University Records Schedule](#), the appropriate official from that school or division should contact the Compliance and Privacy Office with a description of the category of University Records and a recommended Retention Period. The Compliance and Privacy Office will work with OGC to review and modify the University Records Schedule as appropriate.

3. *Modifications to the University Records Schedule*

The Compliance and Privacy Office may make additions, deletions, and modifications to the [University Records Schedule](#) based on applicable legal, regulatory, accreditation, and other standards, including recommended best practices. Faculty and staff should contact the Compliance and Privacy Office promptly if they believe that applicable standards require a Retention Period that differs from the period established in the [University Records Schedule](#).

4. *Disposal of University Records*

In absence of a Litigation Hold or an authorized exception, schools and divisions are responsible for the proper Disposal of University Records upon expiration of the Retention Period established in the [University Records Schedule](#). The appropriate method for Disposal depends on the physical form or medium (e.g., paper or electronic) and the subject matter of the University Records.

University Records containing Regulated or Restricted Information, as defined in the [Information Security Policy](#), must be destroyed in accordance with the level of confidentiality or sensitivity of the records, including, as appropriate, secure shredding or recycling.

Schools and divisions may contact DIT for assistance with the destruction of electronic University Records stored in university systems in accordance with the established Retention Periods.

5. *Convenience Copies*

To meet business and operational needs, schools and divisions may create and maintain unofficial copies of University Records for various purposes (i.e., convenience copies). Schools and divisions should make such convenience copies only when there is a compelling business or operational need. Schools and divisions should avoid making convenience copies of electronic University Records stored in enterprise or university-wide data management systems of record (e.g., Banner, Enterprise Account System) to protect the security and integrity of those records.

If a school or division has convenience copies of University Records, that school or division is responsible for the proper Disposal of such copies. Convenience copies should be disposed of upon the earlier of (i) the conclusion of the business need for which the copy was created, or (ii) the expiration of the Retention Period for the copied University Records established in the [University Records Schedule](#). Convenience copies should not be maintained after the expiration of the applicable Retention Period.

III. **Contacts**

Questions about these procedures should be directed to the following offices based on the subject:

Subject	Contact	Telephone	Email Address
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PROTECTING INFORMATION

RECORDS MANAGEMENT POLICY PROCEDURES

Office of Compliance and Privacy | 202-994-3386 | comply@gwu.edu | <http://compliance.gwu.edu>

THE GEORGE
WASHINGTON
UNIVERSITY
WASHINGTON, DC

Questions on the University Records Schedule or Litigation Holds	Office of the Senior Vice President and General Counsel	(202) 994-6503	gwlegal@gwu.edu
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Questions on Records Management Procedures and Compliance	Compliance and Privacy Office	(202) 994-3386	comply@gwu.edu
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Questions on Records Management	University Archives	(202) 994-7295	archives@gwu.edu
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Questions on Management and Destruction of Electronic Records	Division of Information Technology	(202) 994-4948	ithelp@gwu.edu
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IV. Definitions

Disposal refers to the process of permanently destroying or deleting University Records after the Retention Period has expired, including, but not limited to, recycling records containing Public Information, shredding records containing Regulated or Restricted Information, in accordance with the level of confidentiality or sensitivity of the records, and erasing electronically stored records.

Litigation Hold refers to the process used to preserve all forms of relevant information when litigation is anticipated or pending. OGC will notify relevant departments and work with staff to identify and preserve any records (including electronic records) and other information that could be relevant to the matter. This will include a directive that the department's normal record retention and disposition protocols must be suspended pending resolution of the matter.

Regulated Information refers to information that is protected by local, national, or international statute or regulation mandating certain restriction as defined in the Information Security Policy. Examples of Regulated Information include

government issued identification numbers (e.g., social security numbers and driver's license numbers), financial account numbers (e.g., credit card numbers and bank account numbers), and personal health information.

Restricted Information refers to information that must be limited to appropriate university faculty, staff, students, or other authorized users with a valid business need. This information must be protected from unauthorized access, use, or disclosure consistent with university policies, contract, or designation, or with proprietary or privacy considerations.

Public Information refers to information with no restrictions on access, use, or disclosure, as defined in the Information Security Policy.

Records Survey refers to the creation of an inventory of all types of University Records maintained by a school or division, including information regarding their quantity, physical form, type, location, value, and format (such as paper or electronic).

Retention Period refers to the established period of time that University Records should be maintained for the university's business operations or archival purposes, or to satisfy specific requirements, including, but not limited to, accounting, audit, legal, and tax requirements, after which period of time the records are subject to Disposal.

University Records means all official materials created in the course of the university's operations. This includes information created or received in any form, such as emails, paper documents, electronic files, database or application information, photographic media, and other electronic information.