



**POLICY TITLE**  
*Records Management Policy*

**POLICY NUMBER**  
*6-005*

<b>Responsible Unit:</b> <i>Office of Vice President for Finance and Business Affairs</i>	<b>Effective Date:</b> <i>05/19/2023</i>
<b>Responsible Official:</b> <i>Vice President for Finance and Business Affairs</i>	<b>Last Reviewed Date:</b> <i>05/19/2023</i>
<b>Policy Classification:</b> <i>Governance</i>	<b>Origination Date:</b> <i>06/22/2018</i>

**I. POLICY STATEMENT AND RATIONALE**

The Southern University System Board of Supervisors (System) recognizes that the effective 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 System. As such, the System established this policy to provide a systematic method for developing a formal records retention process and schedule in accordance with *LA R.S. 44:411*.

**II. POLICY SCOPE AND AUDIENCE**

These guidelines are formulated to provide uniform direction regarding methods of records retention, retrieval and safekeeping of Records, destruction of Records, and the development and maintenance of Records Retention Schedules for the System.

This policy will apply to all Records created and received by System employees.

**III. POLICY COMPLIANCE**

Failure to adhere to the policy may result in actions under the appropriate handbook for faculty and staff, including termination, and legal or ethical sanctions under Louisiana laws.

**IV. POLICY DEFINITIONS**

- a. *Education Records* – Records in any form that directly relate to a student and are maintained by the System or its institutions or a person acting on behalf of the System or its institutions 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.

- b. *Electronic Records or Electronically Stored Information (ESI)* – Records created, generated, sent, communicated, received, or stored by electronic means. Examples include but are not limited to, electronic files; communications including email and instant messages sent or received and voicemail; data produced by calendar software; and information management software. In addition to specific data that are electronically stored and readily retrievable, ESI includes data that may not be visible that is generated by computer hard-drive, email and instant messaging, information management software, handheld computer devices (i.e., iPhones, iPads, Blackberry devices, etc.), telecommunications devices and back-up storage devices. ESI may be stored on different electronic devices and removable devices (i.e., internal and external drives, PDAs, smart phones, servers, laptops, backup tapes, thumb drives, CDs, DVDs) and may also reside at different locations (i.e. on the home or work systems, institutionally owned or personal systems in department files, etc.)
- c. *Evidence* – All Records, whether electronic or paper form, created, received, or maintained in the transaction of the business of the System or institutions whether conducted at home or at work.
- d. *Employees* – All part-time and full-time faculty, staff, and administrators employed by the System or its institutions.
- e. *Health Records* – 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 or 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).
- f. *Litigation Hold Notice* – An order to cease destruction and preserve all Records whether paper or electronic that must be retained during litigation notwithstanding the institution's Records Retention Schedule.
- g. *Litigation Hold Procedures* – Suspension of normal operation of document destruction policies for particular Records that are relevant to pending litigation.
- h. *Records* – All documents, papers, letters, books, drawings, maps, plats, photographs, magnetic or optical media, microfilm, photograph, 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. This term shall not be construed to include library and museum material developed or acquired and preserved solely for reference or exhibition purposes, extra copies maintained for convenience in reference or stocks of standard publications, or processed documents.
- i. *Records Coordinator* – The employee appointed by the Records Management Officer and approved by the Chancellor to oversee Records Management at the departmental level.
- j. *Records Management* – 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 efficiency of Records keeping. Includes management of filing and microfilming equipment and supplies; filing and information retrieval systems; files correspondence, reports, and forms management; historical documentation; micrographics; retention programming; and vital Records protection.

- k. *Records Management Officer* – the employee, designated by the System President and each Chancellor, who handles Records Management concerns for each institution and acts as liaison to the Louisiana State Archives. Each of the following shall have a designated Records Management Officer: Southern University System, Southern University at Baton Rouge, Southern University at New Orleans, Southern University at Shreveport, Southern University Law Center, and Southern University Agriculture and Research Extension Center.
- l. *Records Series* – A group of related or similar Records, regardless of medium that may be filed together as a unit used in a similar manner, and typically are evaluated as a unit for determining retention periods.
- m. *Records Retention Schedule* – A set of disposition instructions prescribing how long, in what location, under what conditions, and in what form Records series shall be kept.

## V. POLICY IMPLEMENTATION PROCEDURES

### a. Records Management Officer Designation

Before July 1<sup>st</sup> of each year, the President will designate a Records Management Officer to act as liaison between the Division of Archives and the Southern University System on all matters related to Records Management by completing Louisiana State Archives Form SSARC-940 (<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-940.pdf>). If there are any changes to the Records Management Officer throughout the year, then Louisiana State Archives Form SSARC-940 must be completed and resubmitted to the Louisiana State Archives noting “AMENDMENT” on top of the page within thirty (30) days of such change.

Before July 1<sup>st</sup> of each year, the Chancellors of Southern University at Baton Rouge, Southern University at New Orleans, Southern University at Shreveport, Southern University Law Center, and Southern University Agriculture and Research Extension Center will designate a Records Management Officer to act as liaison between the Division of Archives and each of his/her respective campuses on all matters related to Records Management by completing Louisiana State Archives Form SSARC-940 (<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-940.pdf>). If there are any changes to the Records Management Officer throughout the year, then Louisiana State Archives Form SSARC-940 must be completed and resubmitted to the Louisiana State Archives noting “AMENDMENT” on top of the page within thirty (30) days of such change.

### b. Designation of Records Coordinators

Each Records Management Officer with the approval of his/her respective Chancellor shall designate a Records Coordinator for each department who has adequate knowledge of the

institution's organizational structure and operations and can communicate effectively with institutional personnel and the Records Management Officer. The Records Coordinators will coordinate Records Management activities between the Records Management Officer and the various departments within the institution. The Records Coordinators shall have the authority to oversee Records Management at the departmental level, including:

1. Development of the retention schedule;
2. Compliance with legal requirements; and
3. Processing disposal requests and destruction of agency Records as necessary.

Louisiana State Archives Form SSARC-941 shall be completed to designate the Records Coordinator for each department. This form shall also be completed to designate any change in the Records Coordinator within 30 days of such change.

<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-941.pdf>

**c. Designation of Legal Contact**

The General Counsel shall designate a legal contact for the Southern University System, Southern University at Baton Rouge, Southern University at New Orleans, Southern University at Shreveport, Southern University Law Center, and Southern University Agriculture and Research Extension Center by using Louisiana State Archives Form SSARC-941. This form shall also be completed to designate any change in the Legal Contact within 30 days of such change.

<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-941.pdf>

**d. Designation of Information Technology Contact**

The President and each respective Chancellor shall designate an information technology contact for the Southern University System, Southern University at Baton Rouge, Southern University at New Orleans, Southern University at Shreveport, Southern University Law Center, and Southern University Agriculture and Research Extension Center by using Louisiana State Archives Form SSARC-941. This form shall also be completed to designate any change in the Designation of Information Technology Contact within 30 days of such change.

<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/ssarc-941.pdf>

**e. Records Retention Schedules**

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

Records Coordinators shall complete an accurate Louisiana State Archives Form SSARC-932 in accordance with form instructions for each institutional department with the head of said department. Once Records Coordinators have completed the Louisiana State

Archives Form SSARC-932 for each institutional department, the Records Retention Schedule should be sent to the Records Management Officer for review and approval. The Records Management Officer will send the Records Retention Schedule to the Louisiana State Archives for approval. The Louisiana 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 Louisiana State Archives, who will provide their own approval signature, therefore activating the Records Retention Schedule. Upon notification of approval by the Louisiana State Archives, the Records Management Officer will provide approved copies of the Records Retention Schedules to each respective department for their Records.

Records Coordinators shall ensure that institutional departments 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 Louisiana State Archives approval and must be renewed within ninety (90) days of the expiration date.

1. General Rules on Record Retention Time Frame

- i. La. R.S. 44:36 provides for Records to be preserved and maintained for a period of at least three years from the date on which the public record was made in all instances where the law does not specify a particular period of time.
- ii. The retention requirements for Records of federal awards are set by 2 CFR 200.334. If needed, please contact the Office of General Counsel to obtain a current copy of the federal regulation.
- iii. The Louisiana State Archives offers free records management training classes.

2. Electronic Mail (E-mail) Guidelines

- i. E-mail should be retained based on content not on media type or storage limitations. Employees should not unilaterally discard e-mail because of limits on e-mail box capacities.
- ii. E-mail should not be treated as single Records Series for retention scheduling purposes. E-mail should be incorporated into an existing Records Series with Records of similar content found in other media (i.e., paper, film, electronic image).
- iii. Transitory E-mail Records are records that have limited or no administrative value to the System or its institutions and are not essential to the fulfillment of statutory obligations or to the documentation of functions of the System or its institutions. Examples are unsolicited and junk e-mails not related to the work of the System or its institutions, listserv and other e-mail broadcast lists that require subscription (including newspapers), reminders for meeting and events (i.e., cake in the conference room, staff meeting moved from 2 p.m. to 3 p.m.), personal non-work related e-mails received by employees. There is no retention requirement for transitory messages. Employees receiving such

communications may delete them immediately without obtaining approval from the Louisiana State Archives.

**f. Disposal of Records**

Employees may not dispose of Records without the approval of both the Records Management Officer and the State Archives. Each institutional department must use a Louisiana State Archives 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.

Records Coordinators shall assist institutional departments with completing the Louisiana State Archives Form SSARC-930. Once the Louisiana State Archives Form SSARC-930 is approved by the Records Coordinator, it must be approved by the Records Management Officer, who shall sign the Louisiana State Archives Form SSARC-930 and send it to the Louisiana State Archives for approval. Upon notification of approval by the Louisiana State Archives, the Records Management Officer will provide approved copies of the Louisiana State Archives Form SSARC-930 to the Records Coordinator.

Once approval for disposal has been granted, the Records Coordinator shall assist the institutional department with disposal 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. Records Coordinators shall assist the institutional department with documenting the destruction of their Records by maintaining a certificate of destruction using Louisiana State Archives Form SSARC-933 (<https://www.sos.la.gov/HistoricalResources/PublishedDocuments/SSARC-933.pdf>) for all Records requiring destruction approval from the Louisiana State Archives.

The Records Management Officers shall maintain all approved disposal request forms (SSARC-930) and certificate of destruction forms (SSARC-933) for their respective institutions.

**g. Transfer Records to the Louisiana State Records Center**

Upon approval of the Vice President for Finance and Business Affairs, Records may be transferred to the Louisiana State Records Center for storage in accordance with the procedures of the Louisiana State Archives.

**h. Transfer Permanent Records to the Louisiana State Archives.**

Upon approval of the Vice President for Finance and Business Affairs, permanent Records may be transferred to the Louisiana State Archives for storage in accordance with the procedures of the Louisiana State Archives.

**i. Report any Damaged Records**

Any employee aware of any damaged Records or Records under the threat of being damaged should notify the Records Coordinator immediately. The Records Coordinator will notify the Records Management Officer who shall notify the Louisiana State Archives in accordance with La. R.S. 44:411 by using the Louisiana State Archives Form SSARC-980 (<https://www.sos.la.gov/HistoricalResources/Documents/SSARC-980G.doc>). The original Louisiana State Archives Form SSARC-980 shall be maintained with the respective Records Retention Schedule with a copy sent to the Louisiana State Archives.

**j. Litigation Hold Procedures**

There are circumstances when Records that are involved in litigation, or which can be reasonably anticipated to relate to foreseeable actions must be preserved until the resolution of such litigation. A litigation hold requires the retention of relevant paper and electronic Records for an indefinite period of time due to pending litigation. Any and all Records which might provide insight into the litigation must be maintained until the completion of the issue. The System and its institutions have a legal obligation to preserve evidence and Records, including electronically stored information (ESI), that may be relevant to pending or potential legal actions, such as lawsuits, government audits, and administrative hearings. Federal law requires the System and its institutions to take action in the form of a litigation hold to preserve all paper and ESI information that may be relevant to the claim.

**1. Process**

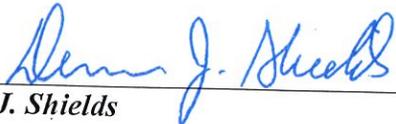
- i. Any employee who becomes aware of litigation, threat of litigation, other legal action or investigation by any administrative, civil or criminal authority shall immediately notify the Office of General Counsel.
- ii. Employees who have received notice of pending or potential claims or action against the System or its institutions must submit such notice to the Office of General Counsel within two (2) business days of receipt of such notice.
- iii. The Office of General Counsel will issue a Litigation Hold Notice within five (5) business days regarding the matter to the appropriate individuals, including the information technology contact and third-party vendors.
- iv. All employees who receive a Litigation Hold Notice shall acknowledge receipt, understanding, and compliance with the notice by returning a signed copy of the notice to the Office of General Counsel. Additionally, the employees must compile paper and electronic documents and data as instructed in the Litigation Hold Notice and send them to the Office of General Counsel. The Office of General Counsel shall maintain the Records until completion of the issue where the Records will be returned to the recordholder for retention and destruction in accordance with this Policy.

**k. Imaging Systems**

1. The information technology contact with the assistance of the Records Management Officer shall complete a Louisiana State Archives Imaging System Survey and provide any amendments to the survey within 30 days of when original information provided is no longer accurate. The survey shall include:
  - i. Louisiana State Archives Form SSARC-970,



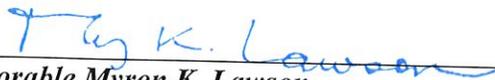
The effective date of this policy is determined by the approval date of the President-Chancellor of the Southern University and A&M College System and the Board of Supervisors of the Southern University and A&M College System.



**Dennis J. Shields**

*President-Chancellor, Southern University and A&M College System*

\_\_\_\_\_  
**Effective Date of Policy**



**The Honorable Myron K. Lawson**

*Chair – Southern University System Board of Supervisors*

\_\_\_\_\_  
**Effective Date of Policy**