

LUTHER COLLEGE

POLICIES AND PROCEDURES

Department:	Archives, Information Technology Services
Subject:	Records Management and Confidential Destruction Policy
Date Issued:	June, 2001
Updated and Reviewed By:	Information Security Council - April 25, 2024
Approved By:	President's Cabinet – September 30, 2024

I. Policy

This policy sets forth the guidelines for record access, retention and destruction.

II. Purpose

To provide guidance for the systematic review, retention, and destruction of records received or created by Luther College in connection with the transaction of College business. This policy covers all records and documents, regardless of format. The policy contains guidelines for how records can be accessed, how long certain records should be kept, and how records should be destroyed. The policy is designed to ensure compliance with federal and state laws and regulations (e.g. FERPA, GLBA), to mitigate accidental or innocent destruction of records and to facilitate Luther College's operations by promoting efficiency and freeing up valuable storage space.

III. Scope

This policy applies to all offices, departments and faculty/staff of Luther College.

IV. Terms and Definitions

1. Archives: The Luther College Archives. The Archives is responsible for collecting, preserving and making available the history and development records of Luther College.
2. College Archivist: Director of the Luther College Archives. The Archivist is responsible for identifying records of historical value for preservation and facilitating records management on campus.
3. Inactive Records: Records that are rarely referred to during the course of business, typically 5-7+ years old. Inactive records are usually ready to be moved from an office or network drive and into the Archives.
4. Records: All material on which information is recorded or preserved, regardless of format or characteristics, which is created or maintained by any agency, officer, or employee of Luther College in the transaction of its business. This definition refers to all forms of recorded information or other material bearing upon the activities and functions of Luther College, any of its officers, and employees. This definition also includes but is not limited to handwritten, typed, or printed material; publications; photographs; moving images; sound recordings; drawings; and electronic or other machine-readable data. Not included in the definition of

records as used in this policy are: faculty research or lecture notes; library materials; and materials not published by the institution.

5. Routine Materials: Classes of records which can be safely destroyed routinely two years after their creation (as long as they are not scheduled for [permanent retention](#)) without consulting the Archivist. These records include but are not limited to: physical or electronic copies of receipts, requisitions, travel vouchers, and travel expense reports (originals addressed below); most printed or electronic material received from outside the College; drafts of documents; and duplicates of reports and memos generated by your office.

V. Procedures and Guidelines

1. Records produced or received by any office or employee of Luther College transacting College business are the property of the institution and subject to institutional policy for retention, disposal, access, and publication, including records produced or received by individuals in administrative and committee service capacities. The records management policy and records retention schedule will be made available on the Archives website. These documents will serve as the formal institutional policy for disposition of all types of records, regardless of format.
2. No College records shall be discarded, deleted, destroyed or transferred from the custody of the home institution or otherwise disposed of except upon the prior approval of the Archivist.
 - The Archivist shall withhold the approval for the destruction of records until satisfied that the records involved need not be retained for legal or accounting reasons, as determined by appropriate officers.
 - Approval either to transfer inactive institutional records to the Archives or to destroy them after an agreed upon period may take the form of written records disposition schedules or other written agreements between the Archivist and those responsible for the custody of these records during their active life.
3. The College Archives is the depository for non-current institutional records having enduring and significant historical or research value.
 - At least two copies of every publication issued by the College or by any of its agencies should be forwarded to the archives.
 - The Archives also solicits and accepts donations of records based on our [collection development policy](#).
 - Additional institutional records of enduring value that should be forwarded to the Archives are listed in Appendix D.
4. Restrictions on access to records transferred to the Archives may be negotiated by the department or office of transmittal. Reference service provided by the Archives may include:
 - Searching records to locate specific pieces of information
 - Making copies of particular documents
 - Making records available for consultation in the Archives

Offices and departments which transfer records to the Archives may request the return of records to the transmitting office if and when subsequent administrative need reveals their transfer to have been premature.

5. Records Management
 - Follow the [Records Retention Schedule](#) and destroy appropriate routine materials. Please see the procedures below for information on confidential destruction.
 - Identify materials that become inactive. Most paper records in an office—reports, correspondence, minutes, and background material—become inactive after 5 to 7 years. Contact the Archives with questions; they will survey the files to determine which files warrant permanent preservation and provide boxes in which to place permanent records.

- Remove routine materials older than two years which are not scheduled for permanent retention.
- Put the contents into chronological order and break the folders at a predetermined date.
- Label the old folders with inclusive dates before boxing them.
- Number the boxes (1 of 3; 2 of 3; 3 of 3).
- Prepare a typed list, sent to the archives as an attachment, of folder titles (including beginning and ending dates) in each box. This ensures that the Archives can retrieve material for you should you need it in the future.
- Attach a completed [Records Transfer Form](#) to each box.
- Notify the Archivist of the records you intend to transfer.
- Finally, put in a work order with Facilities Services to get the boxes moved to the College Archives in Preus Library.

6. Electronic Records Management

- Electronic and other digital records created or received by Luther College employees in their official capacity are property of the institution, subject to the same regulations and policies regarding records retention and disposal. As such, electronic records should be routinely transferred to the archives for preservation.
- Following the [Records Retention Schedule](#), identify inactive records, both on physical media (e.g. CD-Roms, floppy disks, flash drives) and cloud-based records (e.g. files on the network drive, on Dropbox, or on Google Drive).
- Once you have identified inactive records, you are ready to call the Archives to arrange a transfer.
- All electronic records transfers should be accompanied by an [Electronic Records Transfer Form](#). This form should be completed prior to sending material to the Archives, including an inventory of the files.
- Electronic records may be transferred to the Archives in a number of ways. Consult with the Archivist for the most appropriate method of transfer:
 - Records existing on physical media (e.g. flash drives, DVDs, floppy disks) can be placed in a box and moved to the Archives. Box the items, then put in a work order with Facilities to have it delivered to the Archives.
 - For records that exist on network drives or in cloud storage, there are a number of options. (flash drive/hard drive, sharing Google Docs, email).

7. Record Liaison Officers

- Each office and department on campus should have a designated Records Liaison Officer to represent themselves to the Archives in matters of policy and assist in the implementation of the records management program.
- The Records Liaison Officer will be responsible for:
 - Coordinating records management activities within their office, including the transferring of inactive records (both electronic and physical), and confidential shredding.
 - Ensure that records are being kept by members of the office and department as required by the Records Management Policy.
 - Representing their department when reviewing records management policies and procedures.
 - Liaising between the College Archivist and office when necessary.
- While Records Liaison Officers will assist the College Archivist in coordinating records management activity, all faculty and staff are responsible for knowing and adhering to the policies put forth in this document.

8. Access to College Archives

- The College Archives are operated year round. Public research hours are posted in the library. In addition, access is readily available at other times by appointment.
General Rules:
 - Patrons using the collections in the archives must observe all instructions for the use of archival material.
 - Access to restricted records will be limited to authorized individuals only.
 - For the protection of its collections, the Archive reserves the right to restrict the use of materials which are not processed, materials of exceptional value, and fragile materials.
 - Patrons must honor any restrictions placed by donors of private materials.
 - Failure to observe the rules will result in forfeiture of the privilege of using the Archives.
- External Access
 - Non-Luther College users will have the same access to materials with the exception of college records that have been closed to the public. Access to these materials may be granted with the permission of the Cabinet Member governing those records.
- Internal Access
 - Records protected by law are only accessible to the originating department or by special permission of the President. These include all forms of personnel records.
 - Generally, the records of the College are available to any faculty or staff member who needs access in the course of their official duties.
 - Widely distributed documents, such as faculty meeting minutes, are easily accessible without question.
 - Requests for records containing confidential information not directly relating to the requestor's work require the approval of the originating office or department.
 - Any office or department may call for records they created. These records can either be duplicated for their continued use, or the original file can be temporarily borrowed or permanently de-accessioned and returned.
 - Original files will only be lent out to their originating department and faculty/staff representing that department. Access to files created by other departments can be provided in person or through duplication.

9. Luther College Confidential Destruction Policy

- Confidential materials that have reached the end of their use at the college (according to the records retention schedule distributed by the Luther College Archives) shall be transferred to the archives for destruction.
- If your records are to be destroyed according to the records schedule, do the following:
 - Make an inventory including the destruction cycle (i.e. the records are held for 7 years and then destroyed). Please specify the types of records and why they are eligible for destruction.
 - Materials may include staples or paper clips, but no binder clips.
 - Please contact the Archives at x1725 and confirm the records are eligible for destruction.
 - Attach a [Records Transfer Form](#) to each box of material.
 - Contact Facilities Services to have the records moved.

- Records will be staged in a secure location at the archives and then sent to Winneshiek County Recycling for confidential destruction at regular intervals.
- In order to make the most efficient use of our time and resources, it is important that only confidential material as listed on the records schedule or discussed with the archivist is sent to the Archives for destruction.
 - Materials that should be recycled and not sent for confidential destruction include:
 - Brochures, flyers, and other advertisements for campus events
 - Campus publications (course catalogs, faculty/staff handbooks, publicity, etc)
 - Periodicals, newspapers, newsletters
 - Copies of published materials, including books, chapters, and articles, non-fiction or otherwise
 - Blank instructional material (e.g. worksheets, study guides)

10. Appendices

- Appendix A: [Records Retention Schedule](#)
- Appendix B: [Records Transfer Form](#)
- Appendix C: [Electronic Records Transfer Form](#)

All departments and staff/faculty are responsible for the maintenance of records in accordance with the guidelines and procedures as set forth in this policy. The records retention schedule will be reviewed periodically by the Archivist and the appropriate departments for updates and additions. If you have any questions or comments about the information in this policy, please feel free to call the College Archivist at 563-387-1725.