



**Information Retention Management Standards
CSUSB, Information Security Office**

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Author: Javier Torner

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1.0 Information Retention

CSU Executive Order 1031 provides for the implementation of the California State University (CSU) systemwide records/information retention schedules to assist campuses in establishing appropriate operational best practices to meet their commitment to an effective records management program. This executive order requires every campus to develop and implement an Information Retention Management Standards.

CSUSB creates, receives, uses, and retains records of its business processes and activities and the retention of these records are critical for the support of the university mission and its operations. An effective information retention program ensures that records are retain long enough to satisfy internal and external requirements, but not so long as to incur unnecessary storage and maintenance costs, protect unnecessary records from unauthorized access or expose the university to possible liability risks.

2.0 Scope

This standard applies to all records, regardless of medium held by California State University, San Bernardino and all employees of CSUSB.

3.0 Definitions

CSU Records Retention Schedule: A CSU document that lists and governs the retention period of identified records that are common across the CSU. The CSU Records Retention and Disposition Schedules are published online and are accessible to any university employee with record-keeping responsibilities. Current schedules can be found at the CSU Records/Information Retention and Disposition website, www.calstate.edu/recordsretention.

CSU San Bernardino Records Retention Schedule: A document that identifies records unique to CSUSB.

Disposition: Those associated processes associated with implementing records/information retention, destruction, or transfer decisions.

Media: A general term referring to the material on which business information has been recorded and may subsequently be used for business purposes.

Record: Any information or data in any form of communication or presentation, including letters, words, pictures, sounds, or symbols, or any combination of these or other means to engage in business, regardless of media.

Records Custodian: The individual with responsibility for the maintenance and disposition of official/original copies of records maintained by his/her department/area.

Record Disposal: The discarding or abandonment of information or the sale, donation, or transfer of any medium, including computer equipment, upon which information, which has reached the end of its retention period, is stored.

Record Retention: The maintenance of records for prescribed time periods.

Retention Period: The period of time that a record should be kept.

Record Value: Records may have value in one or more of the following areas:

- **Operational:** Required by a campus/department to perform its primary function.
- **Legal:** Required to be kept by law or may be needed for litigation or a government investigation.
- **Fiscal:** Related to the financial transactions of the campus, especially those required for audit or tax purposes.
- **Historical:** Of long-term value to document past events.
- **Vital:** Critical to maintain to ensure operational continuity for the campus after a disruption or disaster. Vital records or information may fall into any one of the above value categories.

Series: A group of related records filed/used together and evaluated as a unit for retention purposes.

4.0 Responsibilities

5.1 Campus Managers

Campus managers are responsible for identifying a record custodian or custodians for their respective department/area.

4.2 Records Custodians

Records Custodians are responsible for:

- ensuring that records are secure in accordance with applicable campus and CSU policy;

- identifying records unique to the campus which are not included in the CSU Records Retention and Disposition Schedules; and
- ensuring appropriate and timely disposal of records in accordance with CSU or campus retention and disposition schedule time frames.

4.3 Information Security Office

The Information security Officer is responsible for communicating and updating the CSUSB Records Retention and Disposition Schedules to the campus. The CSUSB Records Retention and Disposition Schedules will be published on the Information Security Office website, <http://www.inforsec.csusb.edu>.

5.0 Records Retention

California State University, San Bernardino records shall be retained for the time periods indicated in the CSU or CSUSB records retention and disposition schedules; destroyed when the time period for retention has been met; and disposed of in accordance with University standards.

6.0 Creation of Campus Schedules

The campus may modify the CSU Records Retention and Disposition Schedules, as needed, to incorporate records unique to the campus. Modification is limited to the addition of unique, campus-specific records. The CSU Schedules may not be otherwise abridged or altered.

Information regarding campus-specific records shall be provided to the campus Information Security Officer. Information shall include the record title and the records series to which the record shall be added (e.g., University Police, Personnel/Payroll). Information shall also include the identification of the custodian of records, record value, retention source authority, and the retention period.

7.0 Records Disposal

7.1 Determining the Disposal Date

Retention periods are counted from the date of creation of the record, unless other instructions (e.g., "3 years from termination,") are noted in the CSU or CSUSB Records Retention Schedule. Disposition would normally occur following the end of the month or year that marks the end of the retention period; thus, disposition of a record for which the retention period ends on July 10 would take place as soon after July 31 as practicable.

7.2 Timely Disposal

Failure to dispose of records in a timely manner can lead to the unnecessary expenditure of resources to store, maintain, search for, and produce records. Additionally, when records may legitimately be disposed of at the end of their retention period, but are not disposed, such records remain subject to possible future requests under statute or legal proceedings.

7.3 Cautions Regarding Disposal

There may be conditions under which records destruction must be deferred even if they have reached or exceeded the end of their retention period. Some of these conditions include:

- External requirements under state and federal laws or regulation and University grants or contracts override university retention periods, where applicable.
- Records that have been requested pursuant to statute or legal proceeding (e.g., California Public Records Act, Information Practices act, or discovery of evidence in a legal proceeding) must not be disposed of while the matter is ongoing.
- Records that have not yet been requested, but are deemed likely to be requested pursuant to statute or legal proceedings, including potential litigation, must not be disposed of until notification by the campus Risk Manager.
- Records related to any ongoing investigation must not be disposed of without prior consultation with campus counsel.

7.4 Record Disposal Measures

University records shall be disposed of based on their information classification level as described in section 7.2 Information Classification standard.

7.4....1 Level 3 Information

Information/records classified at Level 3 can be disposed of via normal waste disposal practices including recycling.

7.4....2 Level 1 and Level 2 Information

Level 1 and Level 2 information shall be destroyed in accordance with the CSUSB Media Handling standard.

8.0 Retention Schedules

Not all CSU Record Retention and Disposition Schedules have been finalized. As schedules become available, they will be added to the CSU Records/Information Retention and Disposition website, <http://www.calstate.edu/recordsretention> .