

Records Management Policy
For
Western Illinois University

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Sec. 1 Purpose

The President of Western Illinois University is required to maintain an active, continuing program for the economical and efficient management of the records. The State of Illinois State Records Act (5 ILCS 160) sets forth guidelines and responsibilities for Western Illinois University concerning the retention and disposition of records. The University Records Officer is appointed by the President of WIU to assist in applying standards, procedures, and techniques to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and disposal of records of temporary value as set forth by the Secretary of State. This policy is designed to provide guidance to the university for the proper management of records (both paper and digital) to meet the requirements of the State Records Act and State Records Commission Rules. This policy applies to all employees and volunteers, including but not limited to faculty, civil service employees, supportive professional staff, graduate assistants, student employees, and extra help. The retention requirements approved by the State Records Commission supersede any guidelines provided in university policies.

Sec. 2 Definitions

The following are the definitions of the terms referenced in this policy. Where possible, the definitions provided in the State Statute and Rules (5 ILCS 160 and Title 44 - Part 4400) are used:

- **Application for Authority to Dispose of State Records/Retention Schedules:** the document lists the records in each office with corresponding retention, maintenance, and disposition requirements for a record series, based on administrative, fiscal, legal or archival values for the scheduled records. A Retention Schedule is only valid and active upon approval by the State Records Commission.
- **Born-Digital Records:** records created in a digital format, as opposed to those created in other media and then converted to digital surrogates. Examples include word processing documents, electronics spreadsheets, and digital photographs.
- **Department Records Tracker:** a document located in each department listing the retention schedule series title, department record information, and disposition of records within the department.
- **Digital Surrogate:** reproduction of content on analog media that has been scanned, photographed, encoded, or otherwise converted to a digital file that, when printed, viewed, or played, replicates the original content.
- **Disposal of Records:** is the destruction of the record in a secure manner. This will be the manner noted and approved on the Disposal Request. For additional information on the authorized methods of records destruction, please refer to the University's Information Security Procedure or contact the University Records Officer or Chief Information Security Officer (CISO) for guidance.
- **Electronic Record:** A record generated, communicated, received, or stored by electronic means. Both born-digital records and digital surrogates of analog records are considered electronic records. Databases or components of databases may or may not be considered records, depending upon their function and contents. Electronic records must be stored/retained using approved storage media. See Electronic Records section of this policy for additional information.
- **Media Neutral:** items that are included on a record retention schedule, regardless of their medium (i.e., paper, digital, etc.).
- **Metadata:** Metadata describes the record attributes in a way that enables their management and use/reuse. They also document the relationships between records and the agents that made and use them and the events, or circumstances in which the records are made and used. Metadata supports searching of information assets and maintaining their authenticity.

- **Non-record Material:** Non-Records may be copies of university records and materials used solely for reference purposes, transitory messages consisting of correspondence of materials created to communicate information of short-term value, and private/personal material not related to public business. Non-records should be disposed of as soon as possible after their primary usefulness has expired. Unlike university records, non-records do not require State approval prior to their disposal.
- **Office of Record:** any office that has the primary responsibility for maintaining a record as a University Record. There may be multiple offices responsible for maintaining any given record. Offices need to determine if duplicate copies, convenience copies, etc. need to be maintained in accordance with an established records series. The Records Officer can be consulted on those determinations.
- **Permanent:** to be retained forever.
- **Records:** all books, papers, digitized electronic material, maps, photographs, databases, or other official documentary materials, regardless of physical form or characteristics, made, produced, executed, or received by any Agency/University in the State in pursuance of state law or in connection with the transaction of public business and preserved for preservation by the University or its successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the State or of the State Government, or because of the informational data contained therein [5 ILCS 160/2].
- **Records Disposal Certificate:** also called the State of Illinois Records Disposal Certificate. Universities must file the certificate with the State Records Commission prior to destruction of any records present on their approved Application for Authority to Dispose of State Records. This is the document that lists the application number, item no., title, dates, volume, and disposal method of which they wish to request disposal authorization. Universities must file the certificate with the State Records Commission 30 days prior to destruction of any records present on their approved Application for Authority to Dispose of State Records. Western Illinois University departments may not dispose of records until the Certification has been approved and returned to the department by the University Records Officer and the 30-day waiting period has expired.
- **Records Series:** a group of identical or related documents (either as to form or content) that is arranged under a single filing system or kept together as a unit because they consist of the same form, relate to the same subject, result from the same activity, or have certain common physical characteristics (i.e., maps, blueprints, etc.). A series may contain both forms and correspondence.
- **Research, Historical or Archival Value** – Records have enduring value when they reflect significant historical events or document the history and development of university or its policy.
- **Retention Period:** is found in the retention schedule and establishes the length of time required to maintain a record. The time frame for the retention of each record is determined by each office in cooperation with the State Records Commission. An important factor impacting the retention period and record storage location is how often the records are used. For example:

A record that has a retention period of six years and is frequently referenced during the first two years, then infrequently after that time, will likely have a retention period that states:

“Retain two (2) years in office, then transfer to the State Records Center for four (4) years, then destroy in a secure manner.”

- **Retention Schedules:** lists the records in each office at the university and their disposition. It identifies the time frames those records are to be kept before requesting their destruction or transfer to the University Archives. Records not listed in the retention schedule will need to be added before they can be approved for destruction.
- **Secure(d):** all documents (paper or electronic) that are stored in locked cabinets, spaces, or by a method to prevent unauthorized access (encryption) pursuant to the University’s Data Classification Guidelines and Procedures.
- **University Archives:** the location/managing office of permanent records preserved due to historical, administrative, legal, or enduring value as determined by the University Archives and the State Records Commission.

Sec. 3 Records Management Program

The objective of the Records Management Program is to provide a cohesive approach to effectively manage records. This approach lends itself to close coordination with departments and helps protect university records, reduce liability, preserve historical records, and improve efficiencies. This includes the effective scheduling, retention, retrieval, disposition, and safekeeping of all records. This specifically includes:

- Maintenance and modification of the State approved Records Retention Schedule for Western Illinois University, including working with the State Records Commission on new applications and reclassification of records.
- Arrange for the orderly transfer of inactive records to the appropriate destination, including but not limited to, University Archives or the State Records Center.
- Aid in maintaining filing systems to assure efficient usage and prompt retrieval of records.
- Aid departments in all matters relating to records management, filing systems, and electronic records.
- Ensure compliance with the State Records Act and corresponding guidance from the State.

Sec. 4 Record Management Staffing Roles

Designates positions assigned to oversee and assist with the records management program objectives, the following roles have been defined:

Advisory Committee: Committee that reviews the current retention guidelines, records management processes, and may review (at the discretion of the Records Officer) any requests for new or revised applications to ensure that a comprehensive review of the request is completed to determine if it should apply to one or more areas within the university. Additionally, the cross-functional makeup of the committee helps to ensure compliance with legal, audit, human resources, IT, and archive requirements as it pertains to records (both paper and digital) and retention requirements. **The committee includes but is not limited to a member of the university legal office, a member of**

internal audit, the university archivist, the chief information security officer or their designee, and the records officer.

Records Coordinator: These individuals are designated by the college or division for every office, department, organization, and institute to assist the university records officer and advisory committee. A records coordinator is the appointed individual in coordinating the good stewardship of university records, including but not limited to identification of new records, development of new record series, enforcement of retention guidelines, advising the departments within their college of division, requesting permission to destroy or archive records from the records officer who will subsequently request permission from the state. Individuals assigned these duties will maintain the Records Tracking Worksheet for their department.

University Records Officer: The individual appointed by the president that is responsible for the overall management of the university's record management program, to include communications with the Secretary of State's Office regarding additions and revisions to the record retention schedules and requests to dispose of files. The University Records Officer has the ability to designate an individual responsible for the day-to-day maintenance of the records program.

Sec. 5 Employee Roles and Responsibilities

All university employees shall secure, maintain, and dispose of records in accordance with the retention schedules as approved by the State Records Commission. If a university employee knowingly, and without lawful justification, destroys or otherwise disposes of a record not in accordance with approved retention schedules, the employee will be subject to university-issued discipline, up to and including suspension or termination.

If an employee has questions or concerns about the whether they have the authority to destroy or dispose of a record, the employee should contact the university records officer.

Employees are required to maintain records, regardless of format, in an organized and secure manner. Employees need to very aware of records that contain sensitive information, such as personally identifiable information (PII), financial documentation, health records, and other types of confidential information protected by university policy and federal/state confidentiality laws and requirements.

An employee will not destroy a university record without obtaining an approved records disposal certificate from Secretary of State's Office. If an employee is permitted to dispose of a record, the employee will ensure that the disposition is done in a manner consistent with the State Records Act and State Records Commission rules regarding proper physical destruction of sensitive records and information (44 Ill. Adm. Code Part 4400.40).

Sec. 6 Department Roles and Responsibilities

- Departments will ensure their respective area(s) have current record retention schedules. If a department does not have a retention schedule for an area(s) or the current schedule needs revision, it is their responsibility to consult with the Records Officer to develop or update the retention schedules.
- Departments are responsible for following record retention schedules and for disposing of records in a timely manner.

- Departments will designate one individual as a Records Coordinator. The role of the Records Coordinator is defined within the Sec. 2 Definitions.
- Departments will ensure that records are kept in a designated area, such as filing cabinets, storage rooms, or electronic mediums. Departments should be mindful of those who have access to those areas/electronic mediums.
- Departments will maintain a Records Tracker Worksheet as defined under “Definitions” within this policy.

Sec. 7 Roles and Responsibilities of the University Records Officer

Assists the university president and in cooperation with Secretary of State for applying standards, procedures, and techniques to improve the management of records, promote the maintenance and security of records deemed appropriate for preservation, and facilitate the segregation and disposal of records of temporary value.

- The Records Officer will maintain the original of all university record copy and disposal certificates and make them available to departments and employees in an accessible format.
- The Records Officer will assist departments in the creation, addition or revision of records inventories and record retention schedules, and for trainings about records management.
- The Records Officer communicates with the State Records Commission to approve record retention schedules and disposal certificates. The Records Officer will inform the appropriate department and Records Coordinator about the approvals of schedules and disposal certificates.
- The Records Officer will develop and maintain procedures for developing record schedules and disposal certificates. These procedures will be available in an accessible format. The Records Officer will ensure that this policy and associated procedures are in compliance with the State Records Act and State Records Commission Rules.

Sec. 8 Identification of University Records

Identifying university records is the first step in developing and maintaining a records system. A university record includes all the following:

- Books, papers, digitized electronic material, maps, photographs, databases, emails, or other official documentary materials, regardless of physical form or characteristics,
- Made, produced, executed, or received by the university in the pursuance of State law or in connection with the transaction of public business, and
- Preserved or appropriate for preservation by that agency or its successor as evidence of the organization, function, policies, decisions, procedures, operations, or other activities of the university, or because of the informational data contained therein.

All university records are scheduled for disposal through the Records Officer. The Records Officer will communicate with the State Records Commission, which will collaboratively determine the administrative, legal, fiscal, and historical value and appropriate retention of all records.

Non-Record Material: Items not included within the definition of records, defined as “non-record materials,” may be destroyed at any time by the department in possession of such material without the prior approval of the State Records Commission. The State Records Commission may, however,

issue advisory procedures to guide in the disposition of non-record materials (State Records Act Sec. 20, 43.23).

In accordance with the Freedom of Information Act (5 ILCS 140), all physical and electronic materials received or generated by Western Illinois University which pertain to the transaction of public business are “public records,” available for public inspection unless specifically exempted by law. However, only those “public records” which are also University Records must be managed according to the requirements put forth by the Illinois State Records Act. Although they may still be “public records” under the Illinois Freedom of Information Act, non-record materials are not subject to the management and disposal requirements of the State Records Act and, therefore, greater flexibility exists for their management in support of efficient business processes. Because most materials at the University are non-record materials, efficient use of resources and compliance with State law necessitate a clear distinction between university records and non-record materials.

Non-record materials, as compared to university records, do not require State approval prior to their disposal. Most non-record materials should be disposed of as soon as possible after their primary usefulness has expired. Whenever there is doubt that certain items are non-record materials, the items should be considered record materials until their status is determined. Please consult with the Records Officer about whether an item is a record or non-record.

Electronic Records and University Data: An electronic record is a record generated, communicated, received, or stored by electronic means in various storage media. Both born-digital records and digital surrogates of analog records are considered electronic records. Databases or components of databases may or may not be considered records, depending upon their function and contents. University retention schedules apply to all records based upon function and content of the record, not its format (i.e., media neutral).

The management of electronic records follows many of the same principles used to manage traditional records to ensure compliance with the State Records Commission but have additional considerations including but not limited to the preservation and creation of metadata, keeping backup copies, and choosing appropriate formats for long term storage. In addition, records/information that is maintained, used, or in the possession of the university may be a public record subject to FOIA even if it is not state record under the State Records Act.

All electronic records contain university data. That data is classified according to the Information Security Policy, and/or state and federal regulations. All faculty, staff, and third-party agents are required to be aware of the data classification for which they have access to, or oversight of, and to apply appropriate and pre-determined safeguards and comply with all university policy and/or State and Federal Regulations.

Digitizing Records: Digitizing records is the process of creating a digital surrogate from an analog, or a paper record, for a variety of business reasons including ease of use, ease of access, efficiency, analytics, and retention. The integrity and authenticity of the analog records shall be preserved through the digitization process so that the images or surrogates will be authentic copies of the analog records. They must serve the purposes for which the original records were created or maintained, and the copies must contain all significant record detail needed for probable future reference. Analog records may be destroyed in favor of digital surrogates so long as the digital surrogates are produced

in compliance with the State Records Commission Rules, found at 44 Illinois Administrative Code 4400.70 — Digital Reproduction.

For WIU, the scanning of paper documents creates digital copies of the record, but these may not be considered digital surrogates unless created in compliance with Section 4400.70. Questions about whether a scanned document constitutes a digital surrogate should be directed to the Records Officer and additionally may consult with the Advisory Committee.

Records for University Archives - The retention schedules contain dispositions for some record series that require those records to be permanently housed in the University Archives for retention. Archives retains and makes these available for research, in accordance with legislation protecting the privacy of individuals, the non-current records of the University which have historical, legal, or intrinsic value that typically has a permanent retention period. Although most retention schedules will indicate record groups destined for the Archives, the university archives can denote any additional records considered essential for permanent preservation. In addition to administrative records, Archives also is interested in departmental papers and the papers of individual faculty members making significant contributions to the University or to their academic specialties.

Sec. 9 Violations

Persons in violation of this policy may be subject to a range of disciplinary action (determined and enforced by WIU management), including but not limited to the loss of computer network access privileges, disciplinary action, dismissal from the university, and legal action. Issues where there is concern that negligence or non-compliance has occurred should be brought to the appropriate Vice President of the department and/or Records Officer. When an employee knowingly, and without lawful authority, alters, destroys, defaces, removes, or cancels a university record may be referred to the WIU Department of Police and Public Safety or other external authorities and may result in further civil or criminal proceeding.

Sec. 10 Resources

- State Records Act (5 ILCS 160)
- State Records Commission Rules (22 Ill Admin Code Part 4400)
- Records Management Reference Manual for Illinois State Government Agencies
- Records Management Information – Training Modules, Retention Schedules, Records Disposal Certificates, Disposal Policies - http://www.wiu.edu/libraries/archives/records_management/
- Contact the University Records Officer for any details concerning compliance to the Illinois State Records Act by email at records-officer-g@wiu.edu or by phone at 309-298-2717.