

California Institute of Technology
Records Retention and Disposition Policy
8-25-08

The purpose of the Records Retention and Disposition Policy is to establish and maintain a uniform records management policy for the control, retention, storage, retrieval, and disposal of recorded information to comply with all statutory, regulatory, and administrative requirements governing the California Institute of Technology ("Caltech" or the "Institute").

Institute Records are defined as all forms of recorded information (including Electronic Records) regardless of physical characteristics, that are created, received, recorded or legally filed in the course of Institute business or in pursuance of the Institute's legal obligations. These records serve as evidence of the Institute's organization, functions, policies, decisions, procedures, operations, or other activities and are subject to records management review and evaluation prior to any decisions regarding reformatting or disposal. Records created or received by faculty in administrative and Institute committee capacities are also considered to be Institute Records. Institute Records are the sole property of Caltech.

Institute Records should be retained in active office areas only as long as they serve the immediate academic, research, legal, administrative, and fiscal purposes for which they were created. Institute Records are to be retained by the Office of Record in accordance with the California Institute of Technology Records Retention Schedule ("Retention Schedule").

Department and division management should assist employees with the implementation of this Policy and the Retention Schedule. Questions regarding how the Retention Schedule should be applied to a particular document should be referred first to Department or Division management and then to the Office of General Counsel if further clarification is needed.

The Retention Schedule must be applied consistently and kept up to date to be effective. Each department/division is responsible for ensuring that proper retention periods are enforced for individual Records. Each department/division is responsible for regularly reviewing the Retention Schedule, and, if a category is not on the Retention Schedule, submitting a Revision of Document Retention Guideline form to the Office of General Counsel. The Office of General Counsel will determine if the records category already exists and an enhancement to the definition is required or if a new records category needs to be established. The Audit Services & Institute Compliance Office will audit the Records Management Policy periodically.

Information concerning litigation or investigations, of any kind, received by any member of Caltech, should be given immediately to the Office of General Counsel. Any employee who has records relevant to litigation or an investigation must ensure that any document destruction program for those records is suspended. All potentially relevant Institute Records, including electronic documents and email, must be retained and not altered in any way. Even inadvertent destruction of documents can have serious consequences. The Office of General Counsel will notify the department/division management when suspension of the document destruction program is no longer necessary.

Institute departments/divisions are encouraged, when possible and appropriate, to use all available electronic technologies that increase efficiency, reduce expenses or improve the methods to process, handle, retrieve, transmit and retain Institute Records and information.

A. RECORDS RETENTION and DISPOSITION SCHEDULE

The Retention Schedule provides lists of records that are department/division specific, as well as administrative and common records, which cross functional areas, and prescribes the periods of authorized retention.

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All Active and Inactive Institute Records are to be kept for the minimum retention periods listed in the Retention Schedule. Institute Records identified in the Retention Schedule refer to originals, both electronic and paper, unless otherwise stated. Copies of original records maintained for convenience are not covered by the Retention Schedule and should not be retained when no longer useful. Notwithstanding minimum retention periods, all records must be maintained until all required audits are completed and should be retained beyond the listed retention periods when there is a probability of litigation either involving records or requiring their use.

Vital, Historical and Archival Records should be identified in the Retention Schedule and protected in accordance with stated retention periods. For information on the collection, preservation and maintenance of archival records, see the Policy for Access to Archival Materials.

B. DISPOSAL OF RECORDS

Institute Records that are not of a confidential or sensitive nature may be disposed of by means of regularly established departmental practices for handling recyclable or waste paper.

All Institute Records approved for disposal that are of a confidential or sensitive nature may be disposed of by any method of destruction making record recognition impossible. Determination of what constitutes confidential or sensitive records is the responsibility of the department/division. Student academic records, health, payroll and personnel files are the more obvious confidential records.

C. DEFINITIONS

Active Record – A record with current use for the unit that generated it. Records remain active for varying numbers of years, depending on the purpose for which they were created.

Archival Record – A record that is retained permanently for lasting historical value and is used for research and reference by Institute offices and the general public.

Electronic Records - Institute information created, retained or maintained in any digitized configuration on a PC, hard disk, tape, cassette, floppy or any other magnetic storage format, electronic image (optical disk, CD-ROM) or other optical technology, and any other type of electronic technology, may be an electronic record that must be retained to meet administrative, fiscal, legal, research and historical requirements of the Institute.

Historical Record – A record that documents Caltech's existence through time.

Inactive Records - Records no longer needed to conduct current business and consulted infrequently (less than once every year).

Institute Records – Includes all forms of recorded information regardless of physical characteristics, created, received, recorded or legally filed in the course of Institute business or in pursuance of the Institute's legal obligations. These records serve as evidence of the Institute's organization, functions, policies, decisions, procedures, operations, or other activities and are subject to records management review and evaluation prior to any decisions regarding reformatting or disposal. Records created or received by faculty in administrative and Institute committee capacities are also considered to be Institute records.

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Office of Record – That office which is designated as the primary repository for a record, and has the primary responsibility for producing the record if needed for audit or other purposes.

Records Disposition – Refers to the destruction or systematic transfer to archival storage of records no longer needed for everyday operations, or frequent reference, or to satisfy requirements of external agencies.

Retention Period – The length of time a record needs to be maintained to satisfy the purposes for which it was created, and to fulfill legal, fiscal and administrative requirements of the Institute and interested external agencies. At the conclusion of the retention period the record may be destroyed or transferred to storage depending upon the action prescribed in the Schedule.

Vital Record – Records whose loss could result in significant material damage to the Institute and that would be difficult to reconstruct if lost, stolen, or destroyed. These include records that are essential to document the Institute's legal, financial or research position and to preserve the Institute's ongoing operation, commitments, and rights.