

Effective: June 18, 2013

Administrative Policy Records Retention and Disposition

Approved: June 2013, President's Cabinet
Updated March 21, 2025, President's Cabinet

The purpose of this policy is to ensure operational efficiency, to meet legal standards, to preserve Millersville University history, and to promote effective records retention and disposition practices.

Accountability

Millersville University's organizational managerial reporting lines guide oversight of records retention and disposition. The Millersville University President and Cabinet membership comprise executive level oversight. Division vice presidents are responsible for records retention and disposition within their respective divisions.

Cabinet member direct reports are responsible for their unit's implementation of the record retention and disposition policy. Cabinet member direct report responsibilities include adhering to the record retention and disposal schedule, handling records securely, and educating unit employees on best record retention and disposal practices. A Cabinet member direct report may appoint functional area designees.

Archives The archival functional area curates university legacy documents. It is the responsibility of the Cabinet member direct report or Cabinet member direct report designee to ensure that records transferred to the University Archives are primarily legacy documents.

Archives includes permanent retention of official records and reports of Millersville University, its officers and component parts; maps and architectural records; audiovisual materials including still photographs and negatives, motion picture film, oral history interviews, audio and video tapes; and artifacts and ephemera documenting Millersville University's history.

Electronic records are archived in the Millersville University System of Record.

Facilities The facilities functional area is responsible for providing non-electronic record support that includes record transport, record disposal, and coordinating offsite storage location access.

Information Technology The information technology functional area is responsible for providing the technology and advisory services to assist units with secure electronic record retention and disposal.

System of Record

Respective division vice presidents and the Chief Technology Officer ensure that records retention and disposal best practices are followed for campus-based data systems. Management of the system of record for campus-based data systems requires collaborative effort and is a shared

responsibility of functional areas and the Information Technology department. (IT is working on guidance for this area).

All employees will manage records extracted from PASSHE-based systems of record according to the Millersville University records retention and disposal policy.

Unit Guidance

If a unit uses records that are not within their direct oversight according to the records retention and disposal policy, the non-custodial record keeping unit leader is responsible for upholding the record retention and disposal schedule by disposing of the records when they no longer serve a business purpose or when the retention period has expired. The unit leader is also responsible for communicating best practices to direct reports.

A unit may create a unit-focused procedure guide based on the Millersville University records retention and disposal schedule procedures to implement the records retention and disposition policy.

Employee Responsibility

Every Millersville University employee is expected to conduct appropriate records retention and disposition practices as identified in their position description and in related Millersville University policy. If an employee extracts data from a protected system, this data should not be stored on a personal device and should be disposed of in accordance with the records retention and disposal policy.

Records Retention and Disposal Schedule

The Millersville University Records Retention and Disposal Schedule is published in the Millersville University Records Retention and Disposal Procedures. The schedule identifies the division, unit, primary record type, and record retention period. The list is not exhaustive.

Records retention periods may be modified by statute, regulation, judicial or administrative order, contract, pending litigation, or audit requirements. Such modifications supersede the requirements listed in the records retention and disposition procedures. Suspension of record destruction required for any of these reasons will be accomplished by a notice sent to affected units by PASSHE Office of Chief Counsel, Millersville University President's Office, or the respective Millersville University division vice president.

Records Maintained Beyond Retention Period Notice

Any records maintained beyond the retention period may be subject to production in the event of legal action against Millersville University or in response to a request for records under the Pennsylvania Right-to-Know Law. Keeping records beyond the disposal date is strongly discouraged and must be approved by the respective division vice president.

Record Disposal

All records eligible for destruction must be disposed of in a manner that ensures protection of any privileged, proprietary, or confidential information.

Records Retention and Disposal Questions

Questions regarding the retention period or disposal method for a specific document or class of documents may be addressed to the appropriate unit leader for resolution. If the question requires additional review, the unit leader may advance the question to the next level of management.

PASSHE ONESIS Shared Student and Employee Records

Millersville University student and employee record data is shared across all Pennsylvania State System of Higher Education (PASSHE) institutions through the ONESIS shared data system. Millersville University expects its employees to handle PASSHE non-Millersville University shared student and employee records in accordance with the Millersville University Records Retention and Disposition policy.

Definitions

Confidential Information Data and/or other information that must be protected from unauthorized disclosure or public release based on state or federal law is considered confidential. The Millersville University Electronic Data Classification and Handling Policy provides additional information about confidentiality.

Email Messages Documents that are created, stored, and delivered in an electronic format. Email messages and their attachments are similar to other forms of communicated messages, such as correspondence, memoranda, and letters. Email messages also contain features commonly associated with traditional records systems, including calendars, directories, distribution lists, and attachments such as word processing documents, spreadsheets, or images that are incorporated into an email message. OOC 2020-600

Functional Area An operations-focused unit that is responsible for a specific function within an organization. Example areas include, but are not limited to accounting, financial aid, campus life, etc.

Information Technology (IT) Resources Assets including, but not limited to, all State System/University owned or operated hardware, software, telecommunications, and other technology assets issued by the State System or a University. OOC 2020-600

Record A record is any form of recorded information, regardless of physical characteristics, that is created, received, recorded, or legally filed in the course of university business. Millersville University records serve as evidence of the university's organization, functions, policies, decisions, procedures, operations, transactions or other activities. An email is considered a record.

- **Active Record** An active record is a record with current administrative use by the division that generated the record. Records remain active for varying numbers of

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years depending on the purpose for which they were created.

- **Archival Record** An archival record is a record that is inactive, not required to be retained in the division in which it originated, or was received, and has permanent or historic value. Archival records are retained and preserved indefinitely.
- **Electronic Record** A record created, generated, sent, communicated, received, or stored by electronic means. OOC 2020-600
- **Reference Record** A reference record is a record maintained for reference purposes beyond the established retention period.
- **Transitory Record** A transitory record is a document of short-term interest that has no lasting business value. Voicemail, chat, and text are to be used for transitory records purposes only.

Records Retention and Disposal Procedures – Procedures are addressed in an auxiliary document that can be modified as conditions change including, but not limited to, organizational changes and records retention periods.

System of Record Information technology resource that is the authoritative source of a data or information asset. OOC 2020-600