

Vital Records Management Policy

I. INTRODUCTION AND DEFINITION OF VITAL RECORDS

An important part of the college's records management program is the identification and protection of vital records. A record is vital when:

- A. The replacement of a lost or unavailable record would be impossible or prohibitively difficult; and
- B. Permanent loss of the record would abridge, jeopardize, or otherwise have a major negative impact on a significant right of an individual, a significant right or asset of the college, or the performance of an essential function of the college.

II. PURPOSE

The purpose of this policy is to establish the guidelines for the protection of vital records through:

- A. Establishment of criteria for identification of vital records; and
- B. Selection of secure and economical methods of protection.

Adherence to these guidelines should ensure that vital records of the college are reasonably protected as far as is economically possible from such hazards as fire, flood, and vandalism.

III. CRITERIA FOR IDENTIFICATION OF VITAL RECORDS

Three types of college records may be classified as vital:

- A. Records essential to the protection of the rights of individuals;

Examples: current payroll records necessary to pay employees; permanent student transcripts necessary to show completion of course work; employee service records required for protection of tenure and retirement status

- B. Records essential to the protection of the college's rights or assets;

Examples: drawings and specifications required to repair and maintain the college's facilities; records necessary to establish college ownership of buildings, equipment, and land; promissory notes and evidence of other receivables

- C. Records necessary for the execution of the college's contractual obligations and other essential functions;

Examples: significant contracts; accounts payable records; lease agreements

Identification of a particular record as vital is a matter of discretionary judgment that is most effectively exercised by the creators or users of the record, using the criteria in III. A, B and C, above.

Many types of records are of great importance but not of vital importance as defined in this policy. Such records may require much effort and expense to reconstruct if lost, or may have intrinsic historical value. The requirements of this policy do not apply to those important but not vital records, although the standards and methods of protection outlined in this policy may be applied by any department to such records to the degree that the values, risks, and available resources for protection make such protection appropriate.

IV. PRE-IDENTIFIED VITAL RECORDS

The following college records have already been determined to be vital. For ease of reference, these records are also annotated in the Record Retention Policy by the symbol (V) after the record listing.

1. Student Records
 - Student transcripts and academic records
 - Student disciplinary records resulting in suspension or dismissal
 - Enrollment agreements
 - Patient medical records
2. Employee Records (Department of Human Resources)
 - Payroll records
 - Individual employee personnel files
 - Health plan and life insurance enrollment, change and cancellation forms
3. Faculty Records (Provost's Office, Faculty Committees)
 - Faculty personnel and RPT files
4. Institutional Records (Legal Counsel, President's Office, FMS)
 - Office of the president records (including Board of Trustees minutes, corporate resolutions, bylaws and articles of incorporation) - Deeds
 - Campus building records (including architectural drawings, floor plans, equipment inventory records, improvement records)
 - Endowment records, gift agreements, bequest files
 - Financial records (including general ledger, auditors reports, current accounts payable and receivable records)
 - Ownership records of vehicles and other major assets
 - AAGC membership records
 - Promissory notes
 - Federal and state required statistics and reports
5. Library and Archives holdings

Offices holding original copies of pre-identified vital records have the responsibility to ensure they are protected in accordance with the guidelines outlined in this policy.

This list of pre-identified vital records is not intended to be all-encompassing. Additional vital records may be identified by units as provided in Section III.

V. SELECTION OF METHODS OF PROTECTION

- A. Each office or unit is required to develop a written plan that identifies all vital records maintained by them and describes how the office or unit protects such records (hereinafter “protection plan”). This plan should be provided to the Records Management Committee Chair according to a schedule to be determined by the Records Management Committee. The following guidelines are provided to assist offices and units in the development of protection plans for vital records.

The two most important factors guiding the selection of a method of protection for vital records are the level of risk to the record and the cost of the proposed protection method. Offices and units should take these factors into consideration by evaluating the ratio of the effectiveness of the protection method to the cost of that protection method. Since it is possible to attain no more than relative security, the best choice is the one for which the cost of security is most closely in line with the degree of risk, i.e., the greater the risk to a record, the greater the cost that can be justified in protecting it.

- B. Beyond the evaluation of actual risks of loss for vital records, three other factors have a measure of importance in the selection of protection methods:

1. Need for accessibility. Vital records that must be close at hand and available for use at all times may require different methods of protection from those records that are infrequently used.
2. Length of retention. The best methods for protecting vital records of a short-term nature may be different from those methods best for long-term or permanent records.
3. Physical qualities of records. Susceptibility of records to destruction from heat, water, chemicals, and aging varies with both the record medium and the duration of retention. Magnetic tape and film often require different protection from that needed for paper documents. Paper itself varies greatly in its ability to withstand aging.

- C. Six methods of records protection are reviewed below. More than one of those methods can be used to protect a given vital record. It is not uncommon to protect the active portion of a series of records through the preservation of existing duplicates while protecting the inactive portion through other means. Methods 5 and 6 should be considered secondary methods of records protection. For instance, if it is not feasible to implement methods 1, 2, 3, or 4 for reasons of economics, methods 5 or 6 should be used to provide at least a minimum level of protection.

1. Preservation of existing duplicate copies at another location. Many records already have a form of "natural protection" because of the regular paperwork routine. For example, legal counsel may retain the original copy of a contract, while another office may retain a copy of the same contract for reference during the life of the contract. If duplicates exist for a vital record series, the preservation of those duplicates is very effective protection. The likelihood of both copies being

destroyed at any one time is extremely low. This method is equally effective for long- and short-term retention, durable or fragile records, and high- or low-access requirements.

2. Creation of duplicate copies for preservation at another location. Duplicate "security" copies of many vital record series may be created. For example, copies of major gift agreements may be scanned so that they can be maintained electronically, while the original gift agreement is moved to a safe location either on or off campus. Methods of creating copies range from direct reproduction on copying machines to scanning paper copies into an electronic database. This kind of protection is as effective as the first method described. However, the cost of creating duplicate copies is sometimes relatively high.
3. Preservation of source records that would be used to reconstruct vital records. In many cases, documents that are sources for vital records are held by the college or a vendor. For example, statistical reports prepared for the government may be based on college records that are currently available. If such sources can be identified and agreements made for holding them for the length of time protection is required, this method of protection can be nearly as effective for all situations as the first two. Effectiveness is reduced only slightly because several source document series may be involved, any one of which might be destroyed. The overall cost of this method may be higher than the first method, because larger volumes of source records must be retained for longer periods than would ordinarily be the case. However, the net cost of this method will usually be much less than the cost of creating duplicate security copies.
4. Storage in special equipment such as fire-resistant cabinets, safes, or vaults. Original and unique copies of vital records can be protected from most hazards through the use of special storage equipment. While the protection thus obtained is not absolute, its relative effectiveness is only slightly lower than the first three methods. However, of all protection methods, the use of special storage equipment is usually the most costly. This method should be considered only when the other methods are physically not feasible.
5. Removal of hazardous conditions from area of storage. By removing unnecessary hazards such as combustible materials and steam or water pipes and by eliminating undesirable conditions such as air-borne chemicals and extremes of heat or humidity, a relative improvement can be achieved in protection of records. Since the effectiveness of this method is low, it should be considered only when other methods are economically unfeasible.
6. Relocation of records to a less hazardous area. Because of differences in construction, some college buildings are less hazardous for records storage than others. The effectiveness of relocation as a method of protection can be equal to or slightly better than that for removal of hazardous conditions. Cost will be equally low or lower. However, when requirements exist for frequent access to the records, this method may not be feasible. If relocation is considered, the college curator and the director of Facilities Management Services should be consulted to determine the relative safety of various proposed storage areas.

VI. RESPONSIBILITIES

A. Departments, Offices and Units

The individual departments, offices and units are responsible for reviewing their records in relation to the guidelines set forth in this policy, identifying by title those records that are vital, and consulting with legal counsel and other departments, offices and units as appropriate, regarding the location of each vital record

and the type of protection given to it. Development of a written protection plan, as identified in Section V, is mandatory. In cases where protection is not provided for any vital record, a short explanation should be included in the departmental, office or unit protection plan.

B. Records Management Coordinators

Each Records Management Coordinator is responsible for coordinating the development of department protection plans in their area of responsibility and for reporting the status of the plans' development to the Records Management Committee. Coordinators shall be appointed by the college president and shall serve as a member of the Records Management Committee.

Coordinators shall be appointed for the following areas of responsibility:

- Student Records (Registrar, Financial Aid, Dean of Student's Office, Career Education Office, Student Activities, Residence Life, Athletics)
- Employee Records (Office of Human Resources)
- Faculty Records (Provost's Office, Faculty Committees)
- Institutional Records (Legal Counsel, President's Office, FMS)
- Library and Archives holdings

C. Records Management Committee

The Records Management Committee is responsible for the overall management and periodic review of this policy. The Chair of the Committee shall be appointed by the President, and the committee shall be composed of the records management coordinators, the Contract and Compliance Manager, together with the College curator of special collections and archives, the Registrar, the Vice President of Technology and Planning and other members as deemed necessary. The Committee will prescribe the required frequencies of vital records protection plans, which will be not less than once every five years. The Committee shall meet regularly to evaluate the sufficiency of protection plans, evaluate the need for resources to assist in the protection of vital records at the college and provide advice to departments and offices in the implementation of this policy. The Committee shall also report regularly to the Risk Management Committee.

VII. RESPONSIBLE OFFICIAL

The official responsible for reviewing and updating this policy is the Contract and Compliance Manager.