Applies to: Faculty, staff, student employees, students, vendors and volunteers

Responsible Office	Academic Affairs - Library

POLICY STATEMENT

Central Ohio Technical College (COTC) recognizes the need to effectively manage its dynamic, complex decentralized organization, while at the same time preserving its history. Therefore, COTC seeks to manage the retention and **disposition** of its **records** in order to:

1. document management decisions;
2. provide a historical reference of transactions and events;
3. demonstrate regulatory compliance, especially with Ohio Revised Code and federal laws;
4. enhance organization's operational efficiencies;
5. provide litigation support; and
6. preserve the college's institutional memory.

Purpose of the Policy

In compliance with Ohio Revised Code 149.33(B), the Records Management policy establishes a program for the creation, preservation and disposition of records created by the college.

Definitions

Term	Definition
Disposition	Final destruction or transfer to the archives
Document Imaging	The conversion of paper-based documents to digital images, making them readily accessible, thereby enhancing the business processes and workflows of college units.
Record	Any document, device, or item, regardless of physical form or characteristic, including an electronic record as defined in ORC 1306.01, created or received by or coming under the jurisdiction of any public office of the state or its political subdivisions, which serves to document the organization, functions, policies, decisions, procedures, operations, or other activities of the office. **SEE**: https://codes.ohio.gov/ohio-revised-code/section-1306.01
Record Series	A group of related records filed and/or used together as a unit and therefore evaluated as a unit for retention and disposition purposes.
Retention Period	The length of time records should be kept in a certain location or form for administrative, legal, fiscal, historical, or other purposes.
Retention Schedule	A comprehensive list of record series, indicating for each the length of time the series is to be maintained and is disposition.

Policy Details

I. Authority
   A. The Ohio Revised Code 149.33(B) empowers state-supported institutions of higher education to run their own records management programs stating, "The boards of trustees of state-supported institutions of higher education shall have full responsibility for establishing and administering a records program for their respective institutions. The boards shall apply efficient and economical management methods to the creation,

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utilization, maintenance, retention, preservation, and disposition of the records of their respective institutions."
1. Given COTC's cost-sharing relationship with The Ohio State University, the college follows the General Records Retention Schedule developed by The Ohio State University as the basis for its records management program.

2. Archives & Special Collections (Archives) of the John L. & Christine Warner Library oversees the management and disposition of COTC's records common to many offices, as well as developing **retention schedules** for campus units with unique records. Archives provides for the selection, preservation and research use of records that have enduring historical value that document the origin, development, and operations of COTC, and relate the roles of the faculty and staff and/or student organizations to the operational activities of COTC or campus life.

II. Why keep records?
   A. Records must be maintained and managed if there is a legal requirement to do so. Further, there may be fiscal reasons for retaining records--typically managing them until an audit is completed. In absence of legal and fiscal requirements, there may be administrative needs that necessitate the maintenance and management of records. Finally, a portion of the records will be accessioned and maintained by Archives, at the end of their useful administrative life, due to their historical significance.

III. What is a record?
   A. COTC records may include but are not limited to:
      1. Financial records such as requisitions, purchase orders, invoices, bank data, and ledgers or journals;
      2. Administrative records such as correspondence, reports, policy statements and related items sent and received;
      3. Minutes of all COTC boards, committees and other groups;
      4. Personnel records of faculty, staff, and students;
      5. Student records;
      6. Publications and other items issued by COTC; or
      7. Sound recordings, video recordings or photographs of COTC faculty, staff, groups or events.

   B. As a public institution, COTC's records are public records, and therefore are available for public scrutiny as per the Ohio Revised Code 149.43(A)(1). Subsections (a) through (aa) define what documents are not public records and/or what information in a public record is not disclosable. **SEE:** Ohio Revised Code 149.43(A)1: Availability of Public Records for inspection and copying: http://codes.ohio.gov/orc/149.43

IV. How long are records maintained?
   A. The amount of time that COTC must maintain records depends upon the legal, fiscal, administrative, historical, and/or informational value.

   B. Records retention conceptually can be grouped into six major categories, described here in shortest to longest **retention periods**:
      1. Non-record: Any document, device, or item, regardless of physical form or characteristic, that has been created or received in the course of campus business that FAILS to serve as documentation of the organization, functions, policies, decisions, procedures, operations, or other activities of offices of the college. Examples of non-records may include but are not limited to: catalogs, external Listserv® materials, junk mail/spam, non-COTC publications, or personal correspondence.
      2. Transient/Transitory Records: Documents including telephone messages, some emails, drafts and other documents which serve to convey information of a temporary value, have a very short lived administrative, legal and/or fiscal value and should be disposed in an appropriate manner once that

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administrative, legal, and/or fiscal use has expired. Typically, the retention is not a fixed period of time and is event driven; it may be as short as a few hours and could be as long as several days or weeks.

3. Short-Term Records: Records with short-term retention are documents (including some email) of significant administrative, legal, and/or fiscal value having a definitive life of typically ten (10) years or less. Upon expiration of that retention period, records should be disposed in an appropriate manner as soon as possible.

4. Long-Term Records: Records with long-term retention are documents (including some email) which have significant administrative, legal, and/or fiscal value and have a life that is typically longer than ten (10) years. Upon expiration of that retention period, the records should be disposed in an appropriate manner as soon as possible.

5. Indefinite Records: Records with an indefinite retention are documents (including some email) which have significant administrative, legal, and/or fiscal value; further they have an enduring administrative or historical value, and therefore retained until such a point in time as a reappraisal of their value to the organization is conducted.

6. Permanent Records: Records with a permanent retention are documents (including some email) which have significant administrative, legal, and/or fiscal value; further they have an enduring historical value and therefore may be retained forever.

PROCEDURE

I. Records Retention Schedules
   A. The Ohio State University's General Records Retention Schedule accounts for the management and disposition of college **records series** that are common to many units across all campuses.
   B. In addition, there are units that have record series that are unique to their operations and therefore have a unique records retention schedule in addition to the General Schedule. All unique schedules are developed by Archieves in consultation with college departmental representatives.
   C. All records are the property of COTC. They may not be removed, destroyed, mutilated, transferred, or otherwise damaged or disposed of, in whole or in part, except as provided by this policy. Outgoing officials and employees must not remove any records that are the property of the college.
   D. All COTC units must familiarize themselves with the General Schedule, and have an understanding of what records (both paper-based and electronic) they create and/or receive and are required to manage.
      1. Units must conduct an inventory of their records and map them to the General Schedule.
      2. If a unit identifies records types that do not map to the General Schedule, the unit should contact Archives to discuss the creation of a unique schedule. An Archives representative and an appropriate unit representative must sign all unit unique schedules prior to their implementation.

II. Disposition of Records
   A. Part of any effective records management program is the timely disposition of obsolete records and the documentation thereof. COTC units have two general disposition options:
      1. **Records Transfer:** Some records created by COTC units need to be transferred to an appropriate storage facility for temporary storage as dictated by the records retention schedule. Records that have enduring historical value should be transferred to Archives once their useful life has been served. The disposition for these records is typically noted as "Transfer to Archives" or "Archival Review". COTC Records Management procedures for transfers must be followed throughout these processes.
      2. **Records Destruction:** A record series must exist on an approved schedule if it is to be disposed. The COTC unit must confirm that the retention period of the documents has expired and that there is no legal hold on the records (see **Records Requests and Litigation** below**).** Destruction can be

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       accomplished in a variety of ways such as recycling, trash, shredding, and demagnetization (or other electronic desctruction).

B. Units are strongly encouraged to conduct a records purge on an annual basis. Before removing or disposing of the records, the campus unit must complete and forward a Certificate of Records Destruction (CRD) to Archives for review and permanent retention. If restricted information, as defined in COTC's Policy on Institutional Data, is evident, records should be destroyed in a secure manner. A CRD is recommended to be completed for routine disposal of transient records.

III. Records Requests and Litigation Holds

A. As previously noted, COTC records are public records, and therefore must be made available, with certain exceptions, for public scrutiny as per the Ohio Revised Code and the college's Public Records policy. While Ohio law does not state when records are to be provided, the statute requires that COTC provide copies of existing records that are requested with reasonable specificity, within a reasonable period of time.

B. When a legal action is brought against COTC, Federal and State of Ohio Rules of Civil Procedure allow for a discovery motion to be made to examine the respective records (paper-based and electronic) related to the litigation. A litigation hold should be placed upon the records and the disposition process suspended until such time as the litigation is resolved.

IV. Document Conversion

A. Document imaging is the conversion of paper-based documents to digital images, making them readily accessible, thereby enhancing the business processes and workflows of COTC units. The Ohio Electronic Records Committee—an ongoing collaboration, established by the State of Ohio Archives in 1998, with representatives from state and local government, academia, and historical societies—has developed guidelines regarding document imaging best practices. This guidance can be found at: ohioerc.org/?page_id=530.

B. State law does not prohibit a public agency from disposing of the original paper records once they have been imaged. However, before embarking on a document imaging project and/or disposing of converted records, COTC units should develop local imaging system policies and procedures in consultation with Archives. The unit-level procedures document should identify:

1. The governance of the project;
2. The records being imaged/converted and their mapping to the General Schedule and/or unit unique schedule;
3. The hardware/software being utilized for imaging/conversion;
4. A brief step-by-step description of the actual process (i.e., a "How To" manual);
5. Scanning resolution and file format;
6. The indexing schema for retrieval and ultimate disposition of the records;
7. The quality control process (operator and supervisory);
8. The back-up and data recovery plan;
9. The redaction process for restricted information (FERPA, HIPAA, et al);
10. A buffer time, post-imaging, before the paper records will be destroyed;
11. The process for the disposal of paper records in a manner that maintains confidentiality; and
12. An acknowledgment that imaged records must be destroyed at the end of their life per the retention schedule and that a Certificate of Records Destruction must be submitted at that time.

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Responsibilities

Position or Office	Responsibilities
John L. & Christine Warner Library Archives & Special Collections	1. Develop unique records retention schedules for appropriate COTC units. 2. Oversee records destruction process including permanent retention of Certificates of Records Destruction. 3. Provide retention, storage and access to historic COTC records. 4. Educate COTC personnel in records management policy and procedures. 5. Assist in the development of local records policies and procedures.
Office of the President	1. Assist in the handling of discovery requests. 2. Assist in the handling of public records requests.
COTC Units	1. Provide for the retention, storage, access, and disposition of college records in compliance with Ohio State's General Records Retention Schedule, and if appropriate, a unit unique schedule. 2. Process e-Discovery requests. 3. Process public records requests, in consultation with the Office of the President. 4. Integrate document conversion projects into a localized records management program.

Resources

Forms
    Certificate of Records Destruction - https://library.cotc.edu/assets/cotclib/uploads/CERTIFICATE_OF_RECORDS_DESTRUCTION_2013_b.pdf

Additional Guidance
    Section 149.011 of the Ohio Revised Code

    General Records Retention Schedule of The Ohio State University- http://library.osu.edu/documents/records-management/general-schedule.pdf)

    Central Ohio Technical College's Policy on Institutional Data

    Public Records Policy - http://www.cotc.edu/Discover/Documents/PublicRecordsPolicy.pdf

    Ohio Revised Code 1306.0: Uniform Electronic Transaction Act - http://codes.ohio.gov/orc/1306

    Guidelines and additional information can be found on the Library's website at: https://library.cotc.edu/about-us/records-management/

Contacts

Subject	Office	Telephone	E-mail/URL
Public Records; Litigation and e-discovery	Office of the President	740.364.9510	Jan Tomlinson Tomlinson.88@mail.cotc.edu

Applies to: Faculty, staff, student employees, students, vendors and volunteers

Subject	Office	Telephone	E-mail/URL
Records Management: Document Imaging and Conversion, Electronic Record Management, Records Disposal and Transfer, and Retention Scheduling	John L. & Christine Warner Library Archives & Special Collections	740.366.9306	John D. Crissinger crissinger.5@osu.edu

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