

Introduction

Although bureaucratic in nature, records retention schedules provide a foundation for transparency and accountability. They also help to establish a context and interpretive framework for records that later serve as historical documentation of transactions, events, programs, activities, and individuals associated with our institution. For public institutions in Washington State, records retention schedules establish official retention periods allowing for the legal and orderly disposition of records.

Disposition in this case refers to what happens once a record has passed its required retention period and/or is no longer needed to support the function for which it was created. Most often, disposition results in destruction of records, but it is important to note that for historically-important records—those that are designated *archival*—disposition does **not** involve destruction. For archival records, disposition results in a formal transfer of custody to University Archives, and the records are preserved indefinitely as part of the institution's historical record.

By law, no university record may be destroyed, re-formatted (e.g., replaced by digitized, printed, or microfilmed copy), or transferred to the University Archives and Records Center without an approved retention schedule.

Legal Requirements, Roles, and Responsibilities

Records Management and retention schedules at Western Washington University are based on the legal requirements of [RCW 40.14](#), the state statute governing the preservation and disposition of public records; [RCW 42.56](#) public disclosure legislation; and [RCW 40.10](#), which provides for protection of essential records to provide continuity of civil government.

University employees, offices, and departments

Each university employee, office, and department has primary responsibility for the proper and legal management of the records in his/her/its custody.

Records Manager

The Records Manager is responsible for coordination and implementation of the University Records Management Program and Archives and Records Center services.

The Records Manager provides procedural orientation to administrative and academic units and assists Records Coordinators in all phases of records inventory, scheduling and yearly updating of office records schedules. In consultation with office Records Coordinators and appropriate University and government officials, the Analyst makes recommendations for records retention, based on administrative need and the satisfaction of legal, fiscal, and historical needs of the University and the state.

The Records Manager also represents the university before the State Records Committee, which approves all records retention schedules for state government. In these various roles, the Records Manager functions as the university's Records Officer as mandated in [RCW 40.14.040](#).

Records Coordinator

The department head or program unit director designates one staff member as the office "Records Coordinator." It is important that the person be chosen for his/her understanding of the function of the office and familiarity with the files and records, both paper and digital, and the systems by which those are managed.

The Records Coordinator is responsible for the physical inventory of all records holdings for the program unit. This inventory is a critical component of the scheduling process, because it identifies the specific activities and transactions that require records as documentation. The Records Coordinator also acts as a liaison with the Records Manager to effect all phases of the program, including annual updating, retrieval, and disposition.

Schedule Preparation & Approval

- 1. Conduct program unit records inventory.** If a program unit has never established retention schedules for its records, then the first step is to conduct an inventory of its records. The Records Manager can provide assistance in this process, including forms and guidance, but the program unit's Records Coordinator acts as the lead in conducting the inventory. The inventory's purpose is to identify all the records of a program unit, with a goal of identifying both those records for which the program unit has primary retention responsibility and those for which it has secondary or no retention responsibility (e.g., the program unit may receive or interface with a record, but a different program unit has the primary retention responsibility).
- 2. Check existing schedules.** After the initial inventory, the next step in establishing an approved retention schedule for a record is to determine whether an existing schedule already applies for the records. Most records that document typical business functions will already be covered by an existing retention schedule. The office Records Coordinator should check the university's general records retention schedule and/or contact the Records Manager in order to make this determination. If existing schedules apply to the records, the schedules can be implemented immediately.
- 3. Create new retention schedule.** If the Records Manager determines that no existing retention schedule covers a record, then s/he will initiate the process of updating the university retention schedules to include the new record. This process will involve input from the program unit.
- 4. Acquire State Records Committee approval.** All new or revised retention schedules are forwarded to the State Division of Archives and Records Management for review and approval by the State Records Committee (SRC). Once approved by the SRC, the schedule becomes the legal disposition authorization for the affected records.

Schedule Implementation

Upon determination or establishment of an approved records retention schedule, the Records Coordinator implements the schedule by retaining or disposing of records as outlined and approved by the schedule.

Retention and disposition may include:

- Organizing files in order to optimize the ease of retention and disposition (e.g., “files management”). Often this means making sure that files are organized in such a way that their alignment with an approved retention schedule is clear and that the filing supports legal retention and disposition. Contact the university Records Manager for guidance.
- Immediate recycling of non-confidential records that have fulfilled their approved legal retention period, or for which no retention requirement exists
- Immediate confidential shredding of eligible confidential records that have fulfilled their approved legal retention period, or for which no retention requirement exists
- Retention of records for the duration of the required retention period
 - For digital records, this includes ensuring that the records are in secured, logically-organized storage with restricted access and read/write privileges, and that they remain accessible for the full required retention period (for more on digital files management, see "Guidelines for Creating and Managing Digital Records" or [contact us](#) for a copy)
 - For paper records, this includes either retention of the records in a secure office environment or transfer of the records to the Archives & Records Center, according to Schedule guidelines
- Transfer of all “archival” records (paper or digital, or both versions) to the University Archives

Updating the Schedule - Annual Review by Records Coordinator

The State Records Committee requires (as stated in RCW 40.14) an annual review of each committee-approved Records Retention Schedule.

- The Records Manager will send a notice to the Records Coordinator on an annual basis requesting the Coordinator to review the department's Retention Schedule, but the process can be initiated at any time by either party if warranted.
- If changes have occurred, the Records Coordinator should indicate the changes on a copy of the Schedule and return it to the Records Manager, or by other formal notification.
- The Records manager will forward a copy of the updated Schedule to the Records Coordinator for approval.
- Upon departmental approval, the Schedule will be approved by the University Records Officer (and the State Records Committee, if necessary).
- A copy of the approved updated Schedule will be made available to the Records Coordinator, and a permanent copy will be retained by the Records Manager.

Update Considerations

The following situations commonly necessitate updating a retention schedule. Contact the Records Manager if any of the following occur:

- Records for your program unit have been added, changed, or discontinued
- Adoption of new business processes in your unit (these often affect your recordkeeping)
- Filing system revised or reorganized (usually related to business process)
- Record format changes (e.g., records are no longer produced in paper but are born digital)
- Acquired records formerly held by another office
- Planning an implementation of scanning or other digital system
- Office name changed
- Office reorganized