

## Business Policies and Procedures Manual

# University Records–Retention and Disposition

BPPM 90.01

For more information contact:

Policies, Records, and Forms

[509-335-2005](tel:509-335-2005) <tel:509-335-2005>.)

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[Go to all Records Retention Schedules > https://policies.wsu.edu/prf/records-retention-and-disposition/records-retention-schedules/](https://policies.wsu.edu/prf/records-retention-and-disposition/records-retention-schedules/).)

Form: [Retention Schedule Review](http://policies.wsu.edu/prf/documents/2017/10/90-01-retention-schedule-review.pdf) <http://policies.wsu.edu/prf/documents/2017/10/90-01-retention-schedule-review.pdf>.)

## Records Management

Departments are responsible for retaining and disposing of University records in accordance with retention periods approved by the Washington State records committee. ( [RCW 40.14](http://apps.leg.wa.gov/RCW/default.aspx?cite=40.14) <http://apps.leg.wa.gov/RCW/default.aspx?cite=40.14>.)

## Policies, Records, and Forms

Policies, Records, and Forms (PRF) coordinates the records management program and assists departments with records retention and disposition. The director of PRF is the WSU records officer.

## Archives

The University archivist serves as a resource to identify records that may be suitable for the WSU archives collection (see [BPPM 90.02](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-02/) <https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-02/>)).

## State Records Committee

The state records committee reviews and approves University records retention schedules. The committee includes a representative from the State Auditor's Office, the Office of Financial Management, the State Archivist, and the Office of the Attorney General.

## Definition of Records

All records and copies of records made or received in the conduct of WSU business, regardless of physical form or characteristics, are considered public records for purposes of retention and disposition. ( [RCW 40.14.010](http://apps.leg.wa.gov/RCW/default.aspx?cite=40.14.010) <http://apps.leg.wa.gov/RCW/default.aspx?cite=40.14.010> )

## Retention Schedule

An approved records retention schedule specifies retention periods for public records and authorizes destruction or release to the University archives. Records series titles held commonly by multiple departments are included in the [All-University Records Retention Schedule](https://policies.wsu.edu/prf/wsu-records-retention-and-disposition/records-retention-schedules/) <https://policies.wsu.edu/prf/wsu-records-retention-and-disposition/records-retention-schedules/> ). Records series titles held by one department only are included on a department schedule. Department schedules <https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/department-records-retention-schedules/> ) are available to anyone with a WSU NID.

## All-University Schedule

The retention periods for most University records are included on the All-University Records Retention Schedule. Listed retention periods supersede retention periods listed on all previously issued schedules for the indicated record series titles.

If, after review of departmental records, departmental personnel find that all records are included in the All-University Records Retention Schedule, no further action is required by the department. The department retains and disposes of records in conformance with the All-University schedule.

The All-University Records Retention Schedule is maintained on the PRF website and consists of the following tables sorted by business function:

- Administrative—Executive Level Records (Dean and above)
- Administrative—General Office Operations
- Accounting/Fiscal Records
- Information Services Records
- Legal Files
- Library Services Records
- Mail Services Records
- Payroll and Personnel Records
- Property Management Records
- Public Affairs and Public Disclosure Records
- Purchasing Records
- Records Management Files
- Research and Sponsored Projects Records
- Safety Records
- Security Records

- Student Records
- Travel Records

## Department Schedule

If the department has unique records series titles not included on the All-University schedule, the department's records coordinator is to contact the WSU records officer. The records officer, or designee, prepares a draft Department Records Retention Schedule that includes the unique records series titles and recommended retention periods. The records officer, or designee, routes the draft schedule to the department for review.

After departmental review and approval, the records officer, or designee, submits the final records retention schedule to the state records committee for approval.

To request a new or revised department retention schedule, contact PRF; telephone 509-335-2005; mail code 1225; e-mail [prf.forms@wsu.edu](mailto:prf.forms@wsu.edu) <mailto:prf.forms@wsu.edu> ).

## Schedule Description

The following description includes terms used on the All-University schedule and individual department retention schedules. The exhibit in *Figure 1* is of a department schedule.

WASHINGTON STATE UNIVERSITY		RECORDS RETENTION SCHEDULE				PROCEDURES, RECORDS, AND FORMS PULLMAN, WA 99164-1005 (509) 335-2005	
AGENCY NAME 365 Washington State University		OFFICE NAME Procedures, Records, and Forms		MAIL CODE 1225		Page 1 of 3 WSSC NO. 1470	
RECORDS COORDINATOR CONTACT NAME Deborah Bartlett		RECORDS COORDINATOR SIGNATURE		CONTACT TELEPHONE 335-2005		DATE OF SUBMITTAL	
FORM NO.	STATUS New Revised Discontinued Transfer	TITLE / DESCRIPTION	OFFICE OF ORIGIN	LOCATION OF COPIES	EXEMPT	RETENTION PERIOD	DISPOSITION AUTHORITY NO. DATE
	<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONTINUED <input type="checkbox"/> TRANSFER	This revised retention schedule completely supersedes any and all previous schedules for records unique to this office. Refer to the All-University Schedule in BPPM 90.01 for retention periods of records common to many University offices.					
1	<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONTINUED <input type="checkbox"/> TRANSFER	DRAFTS OF POLICY AND PROCEDURES STATEMENTS AND BACKGROUND* Uncompleted projects which may be assigned at some future time or background in completed projects.	OEM		US	0 yr	80-12-26612
2	<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONTINUED <input type="checkbox"/> TRANSFER	FORMS HISTORY FILE* Records created to control the creation, design, use and revision of WSU forms. Includes initial requests for forms, purpose of form, expected usage, copies of the original form and revisions, and related documentation.	OEM		life of form	2 yrs	GS 12001
3	<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONTINUED <input type="checkbox"/> TRANSFER	FORMS INVENTORY FILES* Inventories of stocks of forms on hand.	OEM		US or obsolete	0 yr	GS 12003

[https://s3.wp.wsu.edu/uploads/sites/2980/2018/08/90.01\\_fig1.png](https://s3.wp.wsu.edu/uploads/sites/2980/2018/08/90.01_fig1.png) ).

 Figure 1

## Office Name

The Office Name is the department or unit name.

## Records Coordinator

The department chair designates a Records Coordinator for the department. This employee coordinates the preparation of the Records Retention Schedule, reviews the schedule biennially and supervises retention and disposition of office records. See [Biennial Review Process](#) [#biennial\\_review](#) ).

## Records Series Title and Description

The Records Series Title — Function/Purpose or Title/Description statement names and describes the records in a records series.

## Status

The checkboxes in the Status field indicate whether or not the records series is:

- New to the departmental schedule
- Revised
- Discontinued
- Transferred to another University department

If no checkbox is selected, no change is made to the records series.

## OPR or OFM

### OPR

OPR (Official Public Records) include:

- Records required by state or federal law.
- Records of legal transactions, e.g., receipts, contracts.
- Records used in fiscal/financial audits, e.g., Effort Certification.

### OFM

OFM (Office Files and Memoranda) include all other records including copies of Official Public Records. Most records are OFM.

## Location of Other Copies

This column identifies the location of other copies of the records series. An asterisk (\*) identifies the office holding the official record for the University for that records series. This column may be blank.

The term “Department” indicates that the records series is held in multiple University department locations.

## Retention and Disposition Action

The Retention and Disposition Action is the minimum period that the records must be kept after a specified cutoff event and the action to be taken at the end of this period.

The disposition portion of the statement indicates whether the records are to be destroyed at the end of the retention

period or sent to University Archives for appraisal and selective retention.

## Example

If the retention and disposition action for a records series is "Retain for 2 years after end of fiscal year, then destroy," the records must be collected through the end of the current fiscal year and retained for at least two more fiscal years before destruction.

## Secondary of Reference Copy

Some records series specify retention periods for secondary or reference copies. Note: If no retention of secondary/reference copies is specified for a records series, secondary or reference copies are held until the administrative purpose is served and then destroyed.

## Disposition Authority Number

The state records committee assigns a Disposition Authority Number (DAN) when a records series is approved for retention and disposition.

## Remarks

### Archival Records

If the University archivist determines that a records series may have long-term historical value, "Archival (appraisal required)" is indicated in the Remarks column. Records coordinators arrange to transfer such records to University Archives after the retention period has elapsed. Contact Manuscripts, Archives, and Special Collections (MASC) for assistance; telephone 509-335-6691 (see also [BPPM 90.02 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-02/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-02/))).

## Essential Records

University departments are responsible for identifying and protecting essential records needed during an emergency and for the reestablishment of normal operations afterwards. If a record series is identified by a department as being required for the department to resume operations after a disaster or emergency, "Essential" is indicated in this column. If lost or destroyed, re-creation of essential records can be both costly and time consuming, if not impossible. Refer to [BPPM 90.15 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-15/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-15/)) for the complete essential records policy.

### Biennial Review Process

Each University department is responsible for reviewing the departmental records retention schedule at least once every two years to ensure that the schedule is complete and current ( [RCW 40.14.040 https://app.leg.wa.gov/rcw/default.aspx?cite=40.14.040](https://app.leg.wa.gov/rcw/default.aspx?cite=40.14.040) ). To facilitate this review process, PRF biennially notifies the department of the review requirement and provides a Retention Schedule Review form.

The department records coordinator reviews the schedule with appropriate departmental officials, then returns the completed and signed review form to PRF.. If changes are required, the records officer, or designee, prepares a draft schedule as indicated under [Department Schedule #dept](#)), above.

## Retention Factors

The department is responsible for securely maintaining the records for the retention period indicated on the retention schedule.

## Safety/Confidentiality

The department's responsibility includes ensuring the physical safety of the records, as well as ensuring that confidential records are protected from inappropriate or illegal release. See [BPPM 90.05 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/) for more information about release of confidential records.

## Electronic Records

Electronic records must be retained in electronic format and remain usable, searchable, retrievable, and authentic for the designated retention period. Printing and retaining a hard copy is not a substitute for retention of the electronic version. (WAC 434-662-040 <http://apps.leg.wa.gov/WAC/default.aspx?cite=434-662-040> )

See also [BPPM 90.03 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-03/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-03/) regarding retention of electronic communications.

## Scanned / Imaged Records

Departments may scan paper records and then retain only the imaged copies only if the imaging system (e.g., scanner) produces images that meet the state imaging quality minimum requirements. See [BPPM 90.21 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-21/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-21/) .

Note: If the applicable records series indicates "Archival" in the Remarks column and the imaged copies meet the state's quality minimum requirements, the department must:

- Send the paper records and a copy of the images to University Archives after scanning; then
- Destroy the imaged records at the end of the retention period.

See [Archival Records #archival\\_records](#) , above.

## Permanent Retention

Few records are worth preserving forever. The Records Committee rarely approves retaining a records series permanently.

## Superseding the Retention Schedule

If an audit, legal action, or public records request is in progress, related records may not be disposed of even when authorized by the retention schedule. See [BPPM 30.12 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-30-12/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-30-12/) and [30.14 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-30-14/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-30-14/) regarding audits. See [BPPM 90.05 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/) regarding public records requests and [90.12 https://policies.wsu.edu/prf/index](https://policies.wsu.edu/prf/index)

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[/manuals/business-policies-and-procedures-manual/bppm-90-12/](#) ), regarding litigation holds.

## Inactive Records Storage

After records are no longer regularly accessed, departments should move the records from active files in file cabinets or computers to inactive storage locations.

For inactive storage, paper records may be placed in archive boxes. Archive boxes are acid-free, double-walled storage boxes with built-in handles, and may be obtained from most office supply vendors.

Digital records may be moved to offline storage.

An inactive storage location must be secure from unauthorized access, as well as provide protection from physical damage, e.g., from vandalism, water, fire.

## Space

### WSU Pullman

At WSU Pullman, if acceptable space is not available to store inactive records for the required retention period, download and complete a Request for Allocation of Space to request storage space through [Facilities Services](#) (<https://myfacilities.wsu.edu/space/request.aspx> ).

### Non-Pullman Campuses

At the following regional campus locations, route requests for inactive records storage space to the campus facilities services unit:

- WSU Spokane: 509-358-7994
- WSU Tri-Cities: 509-372-7253
- WSU Vancouver: 360-546-9000
- WSU Everett: 425-405-1600

## Space Unavailable at Campus Location

If records storage space is unavailable at the University campus, center, or station, non-Pullman departments may be able to use storage space at the WSU Pullman campus, if available. See contact information above.

If no other WSU space is available, the State Records Center, managed by the state archivist, provides low-cost, secure records storage. Departments may contact PRF for assistance with this option.

## Records Disposition

An approved records schedule provides authorization to archive or to dispose of University records. ( [RCW 40.14.060](#) (<http://apps.leg.wa.gov/RCW/default.aspx?cite=40.14.060> ) )

After records have been stored for the complete retention period, the records coordinator either sends the records to University Archives or disposes of the records. If the records are to be disposed of, the records coordinator either destroys or recycles the records.

## Recycling

Many records may be recycled in accordance with University recycling procedures (see [BPPM 80.80 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-80-80/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-80-80/)).

## Confidential Records

If the records are confidential, departments are responsible for ensuring that the records are protected from unauthorized or illegal disclosure by reducing them to an illegible condition. ( [WAC 434-640-020 http://apps.leg.wa.gov/WAC/default.aspx?cite=434-640-020](http://apps.leg.wa.gov/WAC/default.aspx?cite=434-640-020) )

## Definition

Confidential records include records that are exempt from public disclosure (see [BPPM 90.05 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-05/) ), [90.06 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-06/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-06/) ), and [90.07 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-07/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-07/) ). Examples of confidential records include student files and patient files.

## Paper Records Destruction

Generally, paper records are destroyed by shredding. Departments may shred records with a departmentally-owned shredder, hire a private shredding company, or have the records shredded by WSU Waste Management.

## Facilities Services, Operations Shredder

The Waste Management division of Facilities Services, Operations at WSU Pullman operates a shredder and accepts confidential paper records for shredding. Contact Waste Management for information regarding use of the shredder and costs to departments; telephone 509-335-4530; e-mail [waste.management@wsu.edu](mailto:waste.management@wsu.edu) ; <mailto:waste.management@wsu.edu> ).

## Private Shredding Company

Departments may obtain the services of a private shredding company. Departmental personnel pay for the service by procurement card ( [BPPM 70.08 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-70-08/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-70-08/) ) or by issuing a purchase order ( [BPPM 70.16 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-70-16/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-70-16/) ).

## Nonpaper Records

Like paper records, confidential records in nonpaper media, e.g., microfilm, CDs, DVDs, hard drives, must be made illegible prior to disposal.



Such media must be physically destroyed or digital records must be securely deleted with a suitable software program. Any electronic destruction method must include at least a three-pass binary overwrite. Contact Policies, Records, and Forms for assistance with locating deletion software.

## Deletion of Electronic Files

To completely delete any type of electronic file, the record holder must:

- Move the file to a trash folder, and
- Empty the trash folder.

Note: Files are not deleted from computers or mobile devices, or from e-mail or voicemail systems, until the applicable trash folders are emptied. Even then, computer forensics may recover some data. Secure deletion techniques may be necessary for complete data destruction. Contact campus or area ITS for further assistance.

## Surplus Computers

See [BPPM 2076](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-20-76/) <https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-20-76/> for procedures for removing data from hard drives of computers to be sent to Surplus Stores or sold to another University department.

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Revisions: Oct. 2022 (Rev. [601](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-601/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-601/> ), June 2022 (Rev. [595](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-595/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-595/> ); Sept. 2021 (Rev. [577](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-577/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-577/> ); July 2021 (Rev. [573](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-573/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-573/> ); Sept. 2020 (Rev. [554](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-554/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-554/> ); Aug. 2019 (Rev. [534](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-534/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-534/> ); July 2017 (Rev. [494](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-494/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-494/> ); July 2016 (Rev. [474](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-474/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-474/> ); Jan. 2016 (Rev. [465](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-465/) <https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-465/> ); 2013 (Rev. 423, 417); 2011 (Rev. 383, 382, 380, 377, 376); 2010 (Rev. 364, 363, 360, 359, 357); 2009 (Rev. 348, 347, 342); 2008 (Rev. 328, 326, 325, 324; 314); 2007 (Rev. 306; 303, 301, 299, 295; 294; 293, 289); 2006 (Rev. 284, 277, 271); 2005 (Rev. 268, 266, 263, 262, 261; 258, 256; 255); 2004 (Rev. 247, 239); 2003 (Rev. 237, 224); 2002 (Rev. 221, 217, 213, 209, 2002); 2001 (Rev. 198, 191, 185, 178, 177); 2000 (Rev. 173, 168, 167, 166, 164, 162, 159); 1999 (Rev. 153, 149, 147, 137); 1998 (Rev. 134, 128, 122, 119, 116); July 1996 (Rev. 100); July 1995 (Rev. 97); Aug. 1994 (Rev. 95); Jan. 1992 (Rev. 88); Feb. 1991 (Rev. 85); Mar. 1989 (Rev. 75); Nov. 1980 (Rev. 41); Jan. 1978 (Rev. 23); Jan. 1976 – new policy (Rev. 7).

# All-University Records Retention Schedule

The All-University records retention schedule includes records series that are held by two or more departments/units in the WSU system. The [department records retention schedules](https://policies.wsu.edu/prf/records-retention-and-disposition/department-records-retention-schedules/) <https://policies.wsu.edu/prf/records-retention-and-disposition/department-records-retention-schedules/> include records series that are held by only one department/unit in the WSU system.

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- [Accounting/Fiscal Records](https://policies.wsu.edu/prf/records-retention-and-disposition/accounting-fiscal-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/accounting-fiscal-records/> .
- [Administrative– Executive Level Records \(Dean and above\)](https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-executive-level-records-dean/) <https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-executive-level-records-dean/> .
- [Administrative–General Office Operations](https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-general-office-operations/) <https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-general-office-operations/> .
- [Information Services Records](https://policies.wsu.edu/prf/records-retention-and-disposition/records-retention-schedules/information-services-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/records-retention-schedules/information-services-records/> .
- [Legal Files](https://policies.wsu.edu/prf/records-retention-and-disposition/legal-files/) <https://policies.wsu.edu/prf/records-retention-and-disposition/legal-files/> .
- [Library Services Records](https://policies.wsu.edu/prf/records-retention-and-disposition/library-services-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/library-services-records/> .
- [Mail Services Records](https://policies.wsu.edu/prf/records-retention-and-disposition/mail-services-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/mail-services-records/> .
- [Payroll and Personnel Records](https://policies.wsu.edu/prf/records-retention-and-disposition/payroll-personnel-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/payroll-personnel-records/> .
- [Property Management Records](https://policies.wsu.edu/prf/records-retention-and-disposition/property-management-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/property-management-records/> .
- [Public Affairs and Public Disclosure Records](https://policies.wsu.edu/prf/records-retention-and-disposition/public-affairs-public-disclosure-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/public-affairs-public-disclosure-records/> .
- [Purchasing Records](https://policies.wsu.edu/prf/records-retention-and-disposition/purchasing-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/purchasing-records/> .

- [Records Management Files](https://policies.wsu.edu/prf/records-retention-and-disposition/records-management-files/) <https://policies.wsu.edu/prf/records-retention-and-disposition/records-management-files/> .).
- [Research and Sponsored Projects Records](https://policies.wsu.edu/prf/records-retention-and-disposition/research-sponsored-project-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/research-sponsored-project-records/> .).
- [Safety Records](https://policies.wsu.edu/prf/records-retention-and-disposition/safety-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/safety-records/> .).
- [Security Records](https://policies.wsu.edu/prf/records-retention-and-disposition/security-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/security-records/> .).
- [Student Records](https://policies.wsu.edu/prf/records-retention-and-disposition/student-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/student-records/> .).
- [Travel Records](https://policies.wsu.edu/prf/records-retention-and-disposition/travel-records/) <https://policies.wsu.edu/prf/records-retention-and-disposition/travel-records/> .).

## Business Policies and Procedures Manual

# Retention of Electronic Communications

BPPM 90.03

For more information contact:

Policies, Records, and Forms  
509-335-2005

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## Overview

Records conveyed electronically are subject to University and departmental retention schedules (see [BPPM 90.01](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-01/) <https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-01/>). Electronic communication records may also be subject to public records requests, legal discovery, and audit review.

Electronic communication methods include, but are not limited to, e-mail, instant messaging, social networking (e.g., Twitter, blogs, wikis), text messaging, and voice mail messages.

For retention purposes, electronic communications are considered methods of delivery rather than record types. Electronic communications, like conventional paper-based mail, can convey many kinds of records and messages. As such, electronic communications are to be managed by message content.

## Management Responsibility

The University does not have a central process for managing electronic communication records, thus management responsibility resides with University staff and departments.

## Retention of Electronic Communications

### Personal Electronic Communications

If conditions specified in [EP45 University Ethics Policy](https://policies.wsu.edu/prf/index/manuals/executive-policy-manual/ep45/) <https://policies.wsu.edu/prf/index/manuals/executive-policy-manual/ep45/> are met, University employees may make occasional but limited use of University computers or accounts to briefly retain personal electronic communication messages unrelated to official University business.

## Personally-Owned Computers or Personal Electronic Communications Accounts

University employees should not use personally-owned computers or personal accounts (e.g., non-University e-mail accounts) to retain official University business-related electronic communication messages.

- When working from personally-owned computers, employees are encouraged to use remote desktop connections and retain official messages on University computers and accounts.
- When it is necessary to generate an official message on a personally-owned computer or account, the employee is responsible for expediently moving the message to a University storage device or computer for retention.

Note: University business-related electronic communications stored on non-University computers or electronic communications accounts may be subject to public records requests, legal discovery, court-ordered production, audit review, and records retention requirements.

## Social Networking Websites

When retention of authorized electronic communications is outside University control, e.g., retention of postings to social networking websites, departments must consider what other records need to be retained. E-mail confirmations of each post or comment are possible examples.

Departments must consider records retention issues when considering any agreements with vendors of social networking websites and when configuring settings for departmental social networking website accounts.

## Text Messages

University business-related text messages are considered public records whether a WSU or personal telephone is used for texting. Retention of text messages is the responsibility of the receiver unless the message is sent to several recipients, in which case, the sender is the responsible record holder (see [Primary Record Holder #prh](#)).

It is important to retain text messages in the original electronic format and manage retention in a way that complies with public records retention guidelines (see [Management of Electronic Communication Records #MECR](#)). The following methods may be used to retain text messages:

- Manually save text messages to a University-controlled storage device such as a content management system or server.
- Send the text messages to a University email account.

Other methods may be used to retain text messages, as long as the messages are saved on a University-controlled electronic system that can be easily managed for records retention purposes.

For directions on how to save text messages, WSU personnel need to contact the applicable cellular telephone service provider, whether it is a WSU or personal telephone.

## Voice Mail Messages

University business-related voice mail messages are considered public records whether the message is received on a WSU or personal telephone. Retention of voice mail messages is the responsibility of the receiver.

It is important to retain voice mail messages in the original electronic format and manage retention in a way that complies with public records retention guidelines (see [Management of Electronic Communication Records #MECR](#)). WSU personnel need to contact their IT department for directions on how to save voice mail messages on office desk telephones.

For directions on how to save voice mail messages on cellular telephones, WSU personnel need to contact the applicable cellular telephone service provider, whether it is a WSU or personal telephone.

## Single Inbox Messaging

WSU personnel on the Pullman, Vancouver, and Spokane campuses have access to Single Inbox Messaging as an option to save voice mail messages. Single Inbox Messaging allows users to receive voice mail messages as .WAV file attachments to their Outlook/Exchange email inbox. IMPORTANT: It is necessary for the user to save the .WAV files to a permanent digital storage location to avoid losing the attachments if and when they delete the email messages.

Single Inbox Messaging is a free service that may be requested by a department budget authority using the [online request system](#) <https://itsforms.wsu.edu/srf/servicecatalog.aspx>.

## Electronic Communications That May Be Deleted When No Longer Needed

As described below, many electronic communications consist of messages and attachments which may be deleted when no longer needed. (See also [Deletion of Electronic Files #deletion\\_electronic\\_files](#).)

Electronic communications records that have no administrative, legal, fiscal, or archival retention requirements may be deleted as soon as the messages have served their purpose. (See various transitory records series in the [Administrative-General Office Operations table](#) <https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-general-office-operations/>.)

Such transitory records include:

- Informational notifications and communications of, as well as requests for, basic or routine short-term information.
- Copies of University-generated forms and publications, provided that the University retains the primary record in accordance with the current approved minimum retention period.
- Notes generated as part of brainstorming/collaborative processes.
- Preliminary drafts, edits, notes, comments, and communications related to the preparation of University documents and correspondence, unless a retention period is otherwise specified on an applicable records retention schedule.

- Scheduling, confirmations, notices, and administrative arrangements for appointments and meetings.
- Copies of memoranda, bulletins, or directives of a general information and noncontinuing nature.
- Contact details and lists of external clients and stakeholders.
- Electronic documents used to create signed paper records.
- Internet browsing (e.g., history, saved passwords, cache/ temporary files, cookies).
- Individual members' copies and notes regarding participation in internal or external committees, provided that the committee's records are retained by the responsible secretary, agency, or member.
- Logs, lists, and other documents relating to the assigning, prioritizing, tracking, monitoring, and status of work and projects in progress.
- Reference materials gathered from outside sources which are not evidence of University business transactions.
- Secondary (duplicate) copies of records created or received, provided that the University retains the primary copy of the record in accordance with the current approved minimum retention period.

## Electronic Communications To Be Retained

Electronic communications and attachments that contain record material must be retained in conformance with the applicable [retention schedule](https://policies.wsu.edu/prf/records-retention-and-disposition/) <https://policies.wsu.edu/prf/records-retention-and-disposition/> ).

The following types of electronic communications messages and attachments are likely to include records with specified retention periods:

- Electronic communications that authorize some official action, transaction, or effort.
- Electronic communications that support or explain a business transaction.
- Documents that complete a business transaction.
- Final reports or recommendations.
- Documents relating to audit or legal issues.
- Electronic communications in support of student class activity, e.g., assignments, class participation.
- Official correspondence that does not fit in another records series. (Non-executive-level general office correspondence is to be retained for at least 30 days. See "Correspondence-General" in the [Administrative-General Office Operations](https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-general-office-operations/) table <https://policies.wsu.edu/prf/records-retention-and-disposition/administrative-general-office-operations/> ).)

## Deletion of Electronic Files

To completely delete any type of electronic file, the record holder must:

- Move the file to a trash folder, *and*
- Empty the trash folder.

Note: Files are not deleted from e-mail or voicemail systems or from computers or mobile devices until the applicable trash folders are emptied.

## Primary Record Holder

It is important to determine who holds the primary record of a document for retention purposes. Reference or informational copies may be deleted when no longer required by the record holder (see above).

The retention schedule usually identifies the office responsible for retaining the official record copy. If the retention schedule does not provide sufficient guidance, refer to the following:

- Ask how would this record be handled if it were a hard-copy transaction or letter. In such cases, the recipient is responsible for retaining the record copy.
- If an electronic communication is sent to a large number of recipients, the sender is responsible for retention of the electronic communication as well as the distribution list.

A draft of a policy is sent to a number of reviewers. The initiator of the draft is responsible for retaining the record copy.

An agenda or meeting minutes are sent to a number of attendees. The sender is responsible for retaining the record copy.

## Management of Electronic Communication Records

University departments and personnel may use one or more of the following methods to assure appropriate management of records with assigned retention periods.

### Retain in Electronic Communication Application Format

Retain the message in the original electronic communication application format on the record holder's hard drive; removable digital media; or an external storage service or device, or in a folder in the record holder's University e-mail account.

Note: The individual record holder must transfer records to the department that are retained in their University email account, prior to departure from the department or University.

The original electronic communication application format is likely to capture and preserve all relevant metadata and attachments related to the record. Metadata is defined as data about data and may describe the content, time, date, author, and formatting of a message. Metadata may be used to aid in the storage, indexing, and retrieving of electronic records for public use.

Note: Printing and retaining a paper copy of an electronic communication is not a substitute for the electronic version, in accordance with [WAC 434-662-040](http://apps.leg.wa.gov/WAC/default.aspx?cite=434-662-040) <http://apps.leg.wa.gov/WAC/default.aspx?cite=434-662-040>).

To facilitate retrieval, retention, and eventual disposal, the record holder could establish separate folders. Each folder could correspond to a specific scheduled records series. Electronic communications folders should be coordinated



with any paper or other electronic filing systems that are in place.

## Retain in Document Management System

Electronic communication messages may be retained in a document management system (DMS) or records management application (RMS). Such systems offer sophisticated control of electronic records, allowing integration of electronic communication messages within the total document environment of an organization. Such software offers single point access to a variety of formats, thus preserving the functionality of documents. Note: The DMS or RMS software must have the capability of capturing and preserving all relevant metadata and attachments related to the records.

## Technology Changes

Many electronic communication messages must be retained longer than the original technology that was used to send, receive, or store them. Departments are responsible for ensuring that older electronic communication messages are migrated to newer technology.

## Retention of Imaged Communications

Departments may scan paper communications and then retain only the imaged copies *as long as* the imaging system (e.g., scanner) produced images that meet the state imaging quality minimum requirements. See [BPPM 90.21 https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-21/](https://policies.wsu.edu/prf/index/manuals/business-policies-and-procedures-manual/bppm-90-21/) ).

## Privacy

Employees are encouraged to review the privacy provisions of [EP4 https://policies.wsu.edu/prf/index/manuals/executive-policy-manual/ep04/](https://policies.wsu.edu/prf/index/manuals/executive-policy-manual/ep04/) ), Electronic Communications Policy.

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Revisions: May 2019 (Rev. [530 https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-530/](https://policies.wsu.edu/prf/bppm-manual-revisions/bppm-revision-530/) ); Nov. 2015 (Rev. 460); July 2009 (Rev. 345); Nov. 2002 – new policy (Rev. 221).

## Electronic Records Management: Can Paper Records Be Destroyed After Scanning/Imaging?

**Purpose:** Provide guidance to state agencies and local government entities on how paper records can be destroyed if they have been properly scanned/imaged.

### Can paper records be destroyed after scanning/imaging?

**YES** – if your agency follows the steps below:

#### 1. Determine if the records are “Archival” or “Non-Archival”

- Designations of “Archival” or “Non-Archival” are clearly indicated on the records retention schedules.
- State agency records retention schedules can be found at:  
<https://www.sos.wa.gov/archives/recordsmanagement/state-agencies-records-retention-schedules.aspx>
- Local government records retention schedules can be found at:  
<https://www.sos.wa.gov/archives/recordsmanagement/local-government-records-retention-schedules---alphabetical-list.aspx>

#### 2. Scan the records according to:

[\*\*Requirements for the Destruction of Non-Archival Paper Records after Imaging\*\*](#)

- For “Archival” records, use the formats recommended for long-term records.

#### 3. What to do with the paper?

- For “Non-Archival” records, destroy the paper records after verification of successful conversion.
- For “Archival” records, contact Washington State Archives for an appraisal. The paper records will either be selected for preservation at Washington State Archives or your agency will be allowed to destroy them.

**Additional advice regarding the management of public records is available from  
Washington State Archives:**

**[www.sos.wa.gov/archives](http://www.sos.wa.gov/archives)  
[recordsmanagement@sos.wa.gov](mailto:recordsmanagement@sos.wa.gov)**



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## **Electronic Records Management: Are Social Media Posts Public Records?**

**Purpose:** Provide guidance to state agencies and local government entities regarding whether social media posts are public records for the purposes of records retention (chapter 40.14 RCW).

### **Are social media posts public records?**

**YES** – If a post relates to public business (the work of the agency), then it is considered a public record in RCW 40.14.010.:

“As used in this chapter, the term "public records" shall include any paper, correspondence, completed form, bound record book, photograph, film, sound recording, map drawing, machine-readable material, compact disc meeting current industry ISO specifications, or other document, regardless of physical form or characteristics, and including such copies thereof, that have been made by or received by any agency of the state of Washington in connection with the transaction of public business, and legislative records as described in RCW 40.14.100.”

### **What if I post using a personal account?**

If you use a personal social media account to conduct business for your agency, you are creating (and potentially receiving) public records.

It doesn't matter if you use a personal account or an agency account. If you are conducting agency business via social media, the records you create and receive are public records and must be managed appropriately.

### **What about public records requests for social media posts?**

For guidance on public records requests for social media, please consult your agency's legal counsel or the Office of the Attorney General's Open Government Program via their website.

**Additional advice regarding the management of public records is available from  
Washington State Archives:**

**[www.sos.wa.gov/archives](http://www.sos.wa.gov/archives)  
[recordsmanagement@sos.wa.gov](mailto:recordsmanagement@sos.wa.gov)**

### Electronic Records Management: Capture and Retention of Text Messages

**Purpose:** Provide guidance to state agencies and local government entities on how to capture text messages for records retention purposes.

#### Is the agency or the phone company responsible for retaining text messages?

**THE AGENCY** – The responsibility for ensuring that public records of agency business conducted via text messaging are appropriately retained lies with the agency.

#### But doesn't the phone company have all the text messages?

**MAYBE** – Phone companies are governed by their own policies, compliance with their own regulatory framework and by the contract your agency makes with them.

Agencies need to be aware and understand what their contract with their text messaging service provider covers in terms of retention of text messages and the agency's ability to access those records, especially if agencies are choosing to rely on their provider to meet the agency's records retention responsibilities.

#### What options are there for capturing and retaining text messages?

1. **Users Save Messages** – Agencies can choose to have their users be responsible for manually saving their text messages to an agency-controlled storage device such as an Enterprise Content Management (ECM) system or a server. However, it may difficult to demonstrate that this is done consistently, especially if questioned during litigation.
2. **Automatic Capture to Agency-Controlled Storage** – Agencies can choose to either configure their text messaging service or use third-party software to automatically capture each text message sent and received either into a repository or as an email sent to the agency.
3. **Vendor Capture and Store Services** – Agencies can choose to use a vendor service to capture and retain their public record text messages. Again, agencies will need to be aware and understand what their contract with their vendor service provides in terms of retention, access to the records, what happens to the text message records at the end of their minimum retention periods and what happens if the contract is terminated or the vendor goes out of business.

**Additional advice regarding the management of public records is available from  
Washington State Archives:**

[www.sos.wa.gov/archives](http://www.sos.wa.gov/archives)  
[recordsmanagement@sos.wa.gov](mailto:recordsmanagement@sos.wa.gov)

## Websites are Public Records

- Agency **internet** sites provide advice/information to the public about the agency, its programs, and its services.
- Agency **intranet** sites provide advice/information to employees about the agency's policies, procedures, etc.
- They are made in connection with the transaction of public business (RCW 40.14.010).
- Agencies must retain all web content in accordance with approved retention schedules (WAC 434-662-140).
- Electronic records must be retained in electronic format and remain useable, searchable, retrievable and authentic for the length of the designated retention period (WAC 434-662-040).

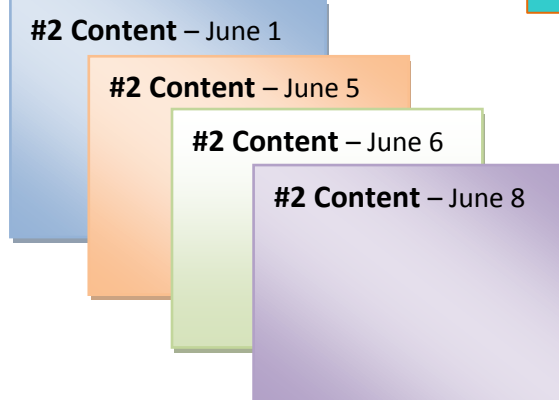
### Three components of Website Records:

#### #1 Design / Architecture

Records documenting the technical design and structure of the website, including the connections between the website and other applications and databases, webpage style templates, etc.

These records are covered by: DAN GS50-06A-03

**Applications – Technical**



#### Database-driven:

- Pulled from agency's database to provide dynamic content for targeted audiences (e.g. location of nearest office based on zip code or IP address).
- Captured into databases via agency website (e.g. web forms.)

Manage the **database** as the agency's primary record, using the appropriate records series based on the function and content of the record.

#### Secondary copies of agency records:

- Annual reports, plans, policies, etc.;
- Brochures, flyers, etc.;
- Forms (other than web forms).

Manage the agency's primary record, using the appropriate records series based on the function and content of the record, and treat the web version as a secondary copy.

These records are covered by: DAN GS50-02-04  
**Secondary (Duplicate) Copies**

#### Advice/Information:

- Actual advice/information about the agency, its programs, and its services, not duplicated elsewhere in the agency's records.

Apply the same retention to these records as you would if you provided the same advice/information by letter or email to everyone in your agency's jurisdiction.

Remember: Advice/ information is being provided every day that it is on your website.

#### #3 Changes to content

Records documenting the **publishing** of website content:

- Requests and approvals to upload/update/remove content.
- Point-in-time records of web pages (snapshots).

Why document changes?

It is not enough to just know *what* was said (the content). Agencies also need records documenting *when* the information was said, and *when* the information was removed (the context).

Tools/techniques to capture records of changes to website content depend on:

- Size and complexity of website;
  - Level of risk associated with the content;
- and can range from:
- Content Management Systems (CRM); to,
  - A series of email exchanges between content author and agency webmaster.

These records are covered by: DAN GS2010-007

**Online Content Management**

### Electronic Records Management: How Long Do Database Records Need to be Kept?

**Purpose:** Provide guidance to state agencies and local government entities on the retention of records contained within databases and information systems.

#### Is there one retention period for database records?

**NO** – The retention period for public records depends on the *function* and *content* of the record, not its format.

How long database records need to be kept depends on the agency's business, legal and accountability needs to retain the evidence of the transaction that is documented in the database record. Like public records in any format, some only need to be kept for a very short time, some need to be kept a little longer, and some will be "Archival" and kept forever.

The questions to ask to determine the function/content of database records are:

1. What is the database record about? (content)
2. Why was it created and for what purpose? (function)

Having just one blanket retention period for database records is akin to having a single retention period for all letter-sized paper – the format does not determine the retention.

#### Is simply keeping the database records forever the answer?

**NO** – Keeping every database record is not the same as managing public records contained within databases and information systems. Such a strategy is unlikely to be sustainable in the long run, will make it harder to locate the public records that need to be retained, may impact the performance of the database/system and may not be the most efficient use of agency resources.

#### What if the database/system can't delete/export records?

Some databases/information systems have not been designed to allow records to be destroyed/transferred in accordance with approved records retention schedules. In such cases, the agency may need to wait until the data needs to be migrated before those records that have met their retention are able to be destroyed/transferred.

#### Where can I find out what the retention is, based on the records' function and content?

**RECORDS RETENTION SCHEDULES** – These schedules set out the minimum required retention periods and grant permission to either destroy or transfer the records at the end of that period. The current approved records retention schedules are available from Washington State Archives' website at:

##### State Agencies:

<http://www.sos.wa.gov/archives/RecordsManagement/RecordsRetentionSchedulesforStateGovernmentAgencies.aspx>

##### Local Government Entities:

<https://www.sos.wa.gov/archives/RecordsManagement/Local-Government-Records-Retention-Schedules---Alphabetical-List.aspx>

**Additional advice regarding the management of public records is available from  
Washington State Archives:**

**[www.sos.wa.gov/archives](http://www.sos.wa.gov/archives)  
[recordsmanagement@sos.wa.gov](mailto:recordsmanagement@sos.wa.gov)**



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## **Electronic Records Management: Hard Drives and Multipurpose Copiers/Scanners**

**Purpose:** Provide guidance to state and local government agencies regarding the images that are stored on the hard drives of copiers and scanners.

The new generation of digital scanner/copiers contain hard drives which often preserve a copy of every image scanned. Agencies need to pay special attention to maintaining the confidentiality and security of public records.

The images that are stored on the hard drives that are in multipurpose copier and scanning devices may contain records that are:

- Confidential
- Private
- Sensitive
- Exempt from disclosure

In many instances the images contained within the hard drive are secondary copies. It is important that agencies apply records management to properly manage and protect public records in accordance to the approved records retention schedules and all local, state, and federal rules are to be followed.

There are steps that can be taken to erase images on hard drives on scanners/copiers before they are traded in. An agency will want to ensure that the images have been appropriately managed prior to any disposal, trade-in, or repurpose action that may be taken. This will protect any sensitive information from remaining on the drives and avoid potential exposure.

As new technologies are introduced, it is important that awareness is raised and concerns addressed regarding public records. Washington State Archives will continue to update and provide new advice to ensure the protection and preservation of public records.

**Additional advice regarding the management of public records is available from  
Washington State Archives:**

**[www.sos.wa.gov/archives](http://www.sos.wa.gov/archives)  
[recordsmanagement@sos.wa.gov](mailto:recordsmanagement@sos.wa.gov)**

# RECORDS RETENTION SCHEDULE

REFERENCE: RCW 40.14

<b>AGENCY NO.</b> 365	<b>AGENCY TITLE</b> Washington State University	<b>OFFICE NAME</b> Procedures, Records, and Forms			<b>MAIL CODE</b> 1225	<b>SUPERVISORY ORG.</b> 1470
<b>RECORDS COORDINATOR CONTACT NAME</b> Joy Faerber		<b>RECORDS COORDINATOR SIGNATURE</b>		<b>CONTACT TELEPHONE</b> 509-335-2005	<b>DATE OF SUBMITTAL</b> August 5, 2020	
<b>STATUS</b> (No change if no box is checked.)	<b>TITLE / DESCRIPTION</b>	<b>OPR OR OFM</b>	<b>LOCATION OF OTHER COPIES</b>	<b>RETENTION AND DISPOSITION ACTION</b>	<b>DISPOSITION AUTHORITY NO. (DAN)</b>	<b>ARCHIVAL DESIGNATION / REMARKS</b>
<p><b>This revised retention schedule completely supersedes any and all previous schedules for records unique to this office.</b>  Refer to the All-University Schedule in BPPM 90.01 for retention periods of records common to many University offices.</p>						
<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONT'D <input type="checkbox"/> TRANSFER	<b>FORMS USERS DATABASE</b> Database used to generate number series for tracking WSU Invoice vouchers. This database includes the WSU Invoice (Receivables System) Number File.	OPR		Retain for 6 years after superseded then Destroy.	05-02-60803 Rev. 0	
<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONT'D <input type="checkbox"/> TRANSFER	<b>REVIEW RECORD</b> Database summary of policies and procedures manuals revision drafts sent for review and approval.	OFM		Retain for 6 years after new section or revision published then Destroy.	05-02-60804 Rev. 0	
<input type="checkbox"/> NEW <input type="checkbox"/> REVISED <input type="checkbox"/> DISCONT'D <input type="checkbox"/> TRANSFER	<b>RULE MAKING (WASHINGTON ADMINISTRATIVE CODE -- WAC)</b> Records relating the development of University rules and amendments (Washington Administrative Code). Includes, but is not limited to: • Records comprising the official University rule making file in accordance with RCW 34.05.370(2); • Internal University documents described in RCW 34.05.370(3) (other than preliminary drafts), such as notes, recommendations, intra-agency memoranda, etc.; • Related correspondence/communications. Excludes: • Preliminary drafts covered by Drafting and Editing (DAN GS 50008; see All-Univ Recs Rtn Schedule--Admin-General Office Recs); • Rules development agendas in accordance with RCW 34.05.314 covered by Reporting to External Agencies (Mandatory) (DAN GS 19004; see All-Univ Recs Rtn Schedule--Admin-General Office Recs).	OPR		Retain for 6 years after rule superseded/ not proceeded with, then Transfer to Archives for permanent retention.	GS 10009 Rev. 1	<b>Archival</b> (permanent retention)

UNIVERSITY RECORDS OFFICER APPROVAL

☐ The above retention periods have been approved by the State Records Committee.

Deborah Bartlett  
RECORDS OFFICER NAME

RECORDS OFFICER SIGNATURE



## **SHOULD I RETAIN OBSOLETE RECORDS? Good Records Management Means Not Keeping The Old Stuff without a Good Reason**

*Jeffrey T. Even, Assistant Attorney General<sup>1</sup>  
July 1999*

So. You have some old records. The Archives and Records Management folks have let you know that the records are now old enough that the law, and the records retention schedules, no longer require you to keep them. Maybe you're not sure what you should keep—even though you don't have to—and what you should let them get rid of. Maybe a few words will help.

You already know that you're not supposed to destroy records that the law obligates you to keep, but sometimes agencies are too reluctant to get rid of the stuff they no longer need. You should keep records that you have a good reason to keep, but "just in case" is not a good reason. Here are a few reasons to let go of what you don't need:

- Keeping stuff you don't need costs money.
- Keeping organized records, uncluttered by ancient and obsolete materials, makes it easier to find what you need when you need it.
- Failure to dispose of public records you no longer need creates unnecessary complication and expense when your agency receives a public records request or becomes involved in litigation. Even if the ancient and obsolete records are not relevant to a request or to a lawsuit, you will be required to search through them in order to respond. You cannot destroy documents when a public records request or lawsuit is pending.<sup>2</sup>
- Failure to properly respond to a public records request will cost your agency money. This is more likely when you have more records to review because you kept stuff you didn't need. Under the Public Disclosure Act, a court is required to order financial sanctions if an agency improperly denies a request for records or fails to respond to a request within a reasonable time.
- If the request comes during litigation, in the form of a discovery request, the failure to properly provide the requested records could cost substantial amounts of money. Washington courts have recently approved large monetary sanctions for discovery abuses.
- Storage facilities cost the taxpayers money. When you neglect to cull unneeded ancient and obsolete records, state storage facilities fill up with the stuff. Maybe the taxpayers will have to build a new building, just to hold the records you could have let go. Sort of a shame.

By all means, keep what the law requires you to keep. Keep what the law doesn't require you to keep if you have a good reason to keep it. But please don't just keep stuff without a good reason. Proper records management simplifies your life, and saves the taxpayers money. In the end these are very good things.

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<sup>1</sup> This document sets forth the individual views of its author, but cannot be regarded as the formal opinion of the Attorney General.

<sup>2</sup> In case of litigation, you should consult with your assigned counsel to determine what records should be placed on "hold" during the lawsuit.