

BFA Administrative Detail: #00 - 3

## **Internal Audit Office CSU Channel Islands Records Retention Compliance Program**

### **1.0 PURPOSE**

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This guideline will provide notice of and detail regarding CSU Channel Island's on-going records retention compliance program, to ensure data is removed/disposed of in accordance with system-wide record retention policies as noted in this document.

### **2.0 BACKGROUND**

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Executive Order 1031, the CSU Records/Information Retention and Disposition Schedules, seeks to provide guidance to ensure that campuses are in compliance with retention authority; legal and regulatory requirements, as well as best practices. Each campus is responsible for implementation of the records retention and disposition schedules pertinent to their area, including the designation of an official campus custodian(s) for each record type.

As of May 2016, there are 11 schedule series identified. Custodians are responsible for controlling the administration of records/information in all media forms. Each area shall be aware of and appropriately adhere to the retention and disposition schedules as indicated.

To assist custodians, and the campus at large, as well as to ensure timely compliance, the Internal Audit Office will conduct periodic compliance reviews and provide feedback to custodians/business areas.

### **3.0 GUIDELINES/PROCEDURES**

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In order to ensure compliance with the CSU Records/Information Retention and Disposition Schedules, the Internal Audit Office will maintain a current document with all relevant schedules and the campus custodian responsible for the various elements/areas. This schedule and the custodian responsible will be reviewed annual for accuracy.

#### **Campuswide Records Retention/Disposition Knowledge and Documentation**

Schedules included:

1. Personnel-Payroll
2. Fiscal Records
3. Facilities
4. Student Records
5. Environmental Health and Safety
6. University Police
7. University Advancement
8. Academic Personnel
9. Curriculum and Accreditation
10. Research and Sponsored Programs
11. Institutional Records

Annually, the Internal Audit office will request completion of a Records Retention Self-Assessment to evaluate each custodian's goals for implementation of the system wide schedules, as well as identify any barriers to compliance.

The Self-Assessment will assist Internal Audit Office in determining where additional guidance may be needed from the system as well as to determine streamlining opportunities to maximize efficiency, where possible.

## Selection of Records for Compliance

Quarterly, the Internal Audit Office will randomly identify records to review for retention/disposition compliance. The record(s) for review will be chosen using their Record Series Identifier, unique identifiers, as listed in the CSU Records/Information Retention and Disposition Schedule. The Schedules are available at <http://www.calstate.edu/recordsretention/>.

## Compliance Engagement and Reporting

Internal Audit Office will conduct a review of internal practices and well as written documentation relating to the retention and disposition of both paper and electronic records and media.

A review of retention practices and disposition activities for a determined time-frame will be assessed.

An internal memo of the findings and any recommendations will be provided to the custodian as well as the other appropriate campus management.

Internal Audit will conduct follow-up of any agreed-upon corrective action.

## 4.0 DEFINITIONS

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### Custodian

This is the title of the campus-designated department head who maintains the official/original copy of the record/information. Retention schedules should specifically identify the campus designated custodian responsible for identified records/information.

### Disposition

A range of processes associated with implementing records/information retention, destruction, or transfer decisions that are documented in the records retention and disposition schedule or other authority.

### Media

A general term referring to the material onto which business information has been recorded and may subsequently be used for business purposes.

### Record/Information

Every means of recording upon any tangible thing in any form of communication or representation, including letters, words, pictures, sounds, or symbols, any combinations of these or other means to engage in business, regardless of media.

This includes, but is not limited to:

- Physical paper in files, such as memos, contracts, reports, photographs and architectural drawings;
- Electronic communication such as e-mail content and attachments, voicemail, instant messages, and data on a contactless integrated circuit;
- Content on Web sites, PDAs, mobile devices, desktops, and servers;
- Information/data captured in various databases;
- Licenses, certificates, registration, identification cards, or other means;
- Handwriting, typewriting, printing, Photostatting, photographing, photocopying, transmitting by electronic mail or facsimile;
- Any record thereby created, regardless of the manner or media in which the record has been stored and/or created; and
- Backups of electronic information.

### Record Series Identifier (unique identifier; UID)

The numeric string that is associated with a single entity/record type within each separate Record Series/Schedule.

### Retention Authority

The statute, code or good business practice that governs the length of time a particular record/information shall/should be kept.

### Retention Period

The period of time that a record/information shall/should be kept. This period may be divided into:

- Active Retention Period – This is the length of time the records or information are to remain available for immediate retrieval to meet operational needs.

- Inactive Retention Period – This is the length of time the records or information are to be retained to meet the long-needs of the campus/CSU.

### Schedule

A document identifying a series of unique records/information associated with a university process or function. For each record/information listed, the schedule will include a unique number/identifier, title, custodian, value, retention authority, and retention period. The basic schedules are to be modified by each campus as needed, e.g., to specify custodians, incorporate additional records, etc.

### Series

A group of related records filed/used together and evaluated as a unit for retention purposes.

### Value

Records and information may have value in one or more of the following areas:

1. Operational: Required by a campus/department to perform its primary function
2. Legal: Required to be kept by law or may be needed litigation or a government investigation.
3. Fiscal: Related to the financial transactions of the campus, especially those required for audit or tax purposes.
4. Historical: Of long-term value to document past events. This may arise from exceptional age and/or connection with some significant historical event or person associated with the CSU.
5. Vital: Critical to maintain to ensure operational continuity for the CSU after a disruption or disaster. Vital records or information may fall into any one of the above value categories.

## 5.0 CONTACTS

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## 6.0 APPROVALS

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Prepared by: S. Howe, University Internal Auditor  
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## 7.0 REVISION TRACKING

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**Document Title: CSU Channel Islands Record Retention Compliance Program**

**Author: S.H., Internal Audit**

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### Revision History

Revision Date	Revised By	Summary of Revisions	Section(s) Revised
2/23/2017	Sonja Howe	Added definition of Record Series Identifier and included link to CSU Retention schedule	3.0, 4.0

### Review / Approval History

Review Date	Reviewed By Name	Reviewed By Department	Action (Reviewed, Recommended or Approved)
2/22/2017	Neal Fisch	Technology and Innovation	Reviewed
2/23/2017	Ysabel Trinidad	Business and Financial Affairs	Reviewed, Approved
2/27/2017	Genevieve Evans-Taylor	Office of the President	Reviewed, Approved