ABOUT RECORDS & INFORMATION MANAGEMENT:

Records and Information Management (RIM) is responsible for guiding University departmental efforts to safeguard official records and informational assets through the management, access, retention, storage, protection, and disposition of those assets. RIM also provides training and operational assistance for all University departments concerning their records retention and secure information management practices.

IT’S THE LAW—

Pursuant to Connecticut General Statute Sections 11-8 and 11-8a, all state agencies must implement ongoing records management programs that are governed by Connecticut Records Management and Retention Policies and Procedures.

In addition, state public and private records—including those of higher education institutions— are also subject to the following federal laws and regulations:

**Clery Act:** The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act is a federal mandate requiring all institutions of higher education that participate in the federal student financial aid program to disclose information about crime on their campuses and in the surrounding communities. Campuses that fail to comply with the act can be penalized with large fines and may be suspended from participating in the federal financial aid program.

**FERPA:** The Family Educational Rights and Privacy Act (20 U.S.C. § 1232g; 34 CFR Part 99) is a federal law that protects the privacy of student education records. Signed into law in 1974, FERPA applies to all schools that receive funds under an applicable program of the U.S. Department of Education, including institutions of higher education.

**GLB Act:** the Gramm-Leach-Bliley Financial Modernization Act of 1999 requires financial institutions to give consumers privacy notices that explain the institutions’ information-sharing practices. In 2003, the Federal Trade Commission confirmed that higher education institutions are considered financial institutions under this federal law. The “Safeguards Rule” of the GLB Act requires financial institutions to have a security plan to protect confidentiality and integrity of personal information. Privacy notices explaining an institution’s information-sharing practices must also be provided.

**HIPPA:** The Health Insurance Portability and Accountability Act protects an individual’s personally identifiable health information and sets standards regarding electronic transmission of health information. Institutions of higher education that provide student health services or sponsor health plans for their employees, whether self-funded or insured, must comply with HIPAA.

**SOX Act:** the Sarbanes-Oxley Act of 2002 established new standards for accountability for corporate officers and boards of directors, new requirements for acceptable corporate conduct, and new penalties, both civil and criminal, for transgressions.

Information transparency, privacy, and confidentiality considerations require all employees to be aware of both existing and changing state and federal laws and regulations. Failure to do so may result in financial penalties and/or damaged public relations.

*DID YOU KNOW??

♦ One study found that in a single year—after subtracting the RIM program’s budget—records management saved a university $667,882 in source and filing equipment alone. (http://www.theimpros.com/im/case.html)

♦ Perhaps because there were no shredders back then, ancient Egyptians used discarded documents to stuff crocodile mummies. (http://www.neh.gov/news/humanities/2001-05/mummycros.html)

*These descriptions are brief summaries only and are in no way to be considered as constituting any kind of legal guidance.
**Establishing Record Retention Requirements**

Retention schedules are the core component of systematic records and information management. They provide the foundation upon which other records management activities are based. Retention decisions are based on the content and purpose of records. Retention periods are establishing by evaluating the administrative, fiscal, legal, historical, and research value of records:

1. **Administrative**: records which pertain to the origin, development, activities, and accomplishments of an organization. Administrative records generally fall into two categories:
   - **Policy Records**: relate to the organization, plans, methods, techniques, or rules which the agency has adopted to carry out its responsibilities and functions. Examples include budgets/budget planning records, organizational charts, manuals, correspondence, and special reports.
   - **Operational Records**: those necessary to implement administrative policies, procedures, and operations. The operational value is the usefulness of a record in the conduct of an organization’s business. Examples include mandates, procedural records, or records that give direction.

2. **Fiscal**: records that relate to an agency's financial transactions such as budgets, payrolls, vouchers, and accounting records.

3. **Legal**: records of legal value include those with evidence of legally enforceable rights or obligations of the State including contracts, agreements, legal proceedings, state personnel records, and executive orders.

4. **Historical**: records worthy of permanent preservation for reference and research purposes including student transcripts, institutional research records, and annual reports.

5. **Research**: records used in scholarly studies and investigations such as case study files, survey data, and various types of statistics.

In most cases, the value of a record determines the retention period required. However, a record can have more than one value, or its value may change over time. For example, during its business transactional period, a state check may have administrative value. Then, once the transaction is complete, the check may have fiscal value because it documents an expenditure of public funds. Finally, depending on the purpose for which it was issued, it may have legal value. Consequently, a careful evaluation of a record’s full lifecycle should be done prior to its incorporation into a records retention schedule.

---

**State of Connecticut Records Retention Schedules**

The Connecticut Office of the Public Records Administrator (OPRA) has developed “Records Retention Schedules” that apply to all state agencies as well as one specific to higher education records. Each schedule applies to a specific category of records and identifies records’ series, a series’ description, time period for which each record series should be kept, and manner of disposition.

**Records Retention Schedules:**

The following seven records retention schedules apply to SCSU:

- S1: Administrative Records
- S2: Personnel Records
- S3: Fiscal Records
- S4: Health Information Records
- S5: Higher Education Records
- S6: Information Systems Records
- S10: Public Safety Records

To access any of these schedules, please see [CT Records Retention Schedules](#) on SCSU’s Records and Information Management’s website.

For questions regarding records retention, contact the ARMLO for your division (see page 3), or call Phil Koslowski at x26205.
A Shredder is Not Just a Shredder—

Until the mid-1980s, it was rare for paper shredders to be used by non-governmental entities. However, after a 1984 U.S. Supreme Court decision held that the 4th Amendment does not prohibit the warrantless search and seizure of garbage left for collection outside of a home, paper shredders became popular. Today, shredders range in size and price from small, inexpensive units only meant for a few pages to large commercial units that can shred millions of documents an hour. Beyond that, there are methods that use burning, chemical decomposition, or composting to dispose of already shredded documents.

**Types of Paper Shredders:**

- **Strip-cut:** the least secure, uses rotating knives to cut narrow strips as long as the original sheet of paper.
- **Cross-cut:** shredders that use two contra-rotating drums to cut rectangular, or diamond-shaped pieces.
- **Particle-cut:** shredders that create tiny square or circular pieces of paper.
- **Disintegrators:** repeatedly cuts paper until the particles are small enough to pass through a mesh.
- **Hammermills:** pounds paper through a screen.
- **Pierce and Tear:** rotating blades pierces paper and then tears it apart.
- **Grinders:** a rotating shaft with cutting blades grinds paper until it is small enough to fall through a screen.

**Security Levels of Paper Shredders:**

Security levels are determined by size and shape of the shreds they produce:

- Level 1 = 12 mm strips
- Level 2 = 6 mm strips
- Level 3 = 2 mm strips (confidential)
- Level 4 = 2x15 mm particles (commercially sensitive)
- Level 5 = 0.8x12 mm particles (top secret or classified)
- Level 6 = 0.8x4 mm particles (top secret or classified)

**REMEMBER** — OPRA requires all state agencies to obtain approval before disposing of official records by completing an **RC-108 Records Disposition Authorization for State Agencies**. Once approval has been received, all official public records must be shredded in a secure manner. In addition, a certificate of destruction issued by the shredding vendor must be maintained by the state agency.

Shred-It, Inc., under contract with the State, is the vendor SCSU uses to dispose of old records. To access SCSU’s shredding policies and procedures, see **Disposing of Old Records** on SCSU’s Records and Information Management’s website. If you would like more information on records management, retention, or disposition, please contact the ARMLO for your area or call Phil Koslowski at x26205.

For questions pertaining to SCSU records and information management, please contact your Division’s ARMLO.

<table>
<thead>
<tr>
<th>ARMLO</th>
<th>AREA</th>
<th>EXT.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beth Johnson</td>
<td>Office of the President</td>
<td>25253</td>
</tr>
<tr>
<td>Mildred Hernandez</td>
<td>Office of Diversity &amp; Equity</td>
<td>25491</td>
</tr>
<tr>
<td>Gerri Natkin</td>
<td>Office of Academic Affairs</td>
<td>25090</td>
</tr>
<tr>
<td>Norma Valentin</td>
<td>Office of Finance &amp; Administration</td>
<td>25227</td>
</tr>
<tr>
<td>Nancy Chucta</td>
<td>Office of Student &amp; University Affairs</td>
<td>25553</td>
</tr>
<tr>
<td>Shermaine Edmonds</td>
<td>Office of Information Technology</td>
<td>25019</td>
</tr>
<tr>
<td>Linda Robinson</td>
<td>Office of Institutional Advancement</td>
<td>26192</td>
</tr>
<tr>
<td>Maria Buccieri</td>
<td>Office of Human Resources</td>
<td>28810</td>
</tr>
</tbody>
</table>