

UNIVERSITY OF HOUSTON SYSTEM
ADMINISTRATIVE MEMORANDUM

SECTION: Fiscal Affairs

NUMBER: 03.H.01

AREA: Records Management

SUBJECT: Records Retention

1. PURPOSE

The purpose of this document is to establish principles and policies necessary to preserve the state records of the component university, and

- comply with state and federal law,
- apply best practices for electronic and hard copy document retention and management,
- demonstrate fiscal responsibility and efficiency by eliminating the need for unnecessary extra file space (both computer file storage space and file cabinets/rooms), and
- define a system to store, access, and dispose of these records in accordance with state and federal guidelines.

2. POLICY

- 2.1. The Texas Government Code, [Chapter 441, Section 441.183](#) requires state agencies to establish and maintain a records management program on a continuing and active basis.
- 2.2. The Texas Administrative Code (TAC), [Title 13, Part 1, Chapter 6](#) provides specific requirements for maintaining a records management program. Each agency is required by Texas Government Code [Section 441.185](#) to maintain a records retention schedule for state records and to submit this schedule to the state records administrator. This schedule must list the state records created and received by the agency, propose a period of time each record shall be maintained by the agency, and provide other information necessary for the operation of an effective records management program.
- 2.3. The [University of Houston System Records Retention Schedule](#) has been prepared and filed with the state records administrator as required, and serves as the schedule for the System and each of the component universities. State regulations ([13 TAC §6.3](#)) require that the retention schedule be reviewed, updated, and re-certified annually for the first two years after the initial approval of the schedule

and every five years thereafter. The System Records Retention Officer will coordinate changes recommended by the various components prior to final approval submission. All divisions/departments of the system are required to adhere to the retention guideline and schedule noted above prior to storing state records or requesting destruction of the records. Divisions/departments having custody of official state records must obtain approval for the destruction of those items from the designated administrative officer.

- 2.4. [Section 441.184](#) of the Government Code states that each agency shall have a records administrator, appointed by the head of the agency, to ensure compliance with state law with reference to the preservation of state records.
- 2.5. Each component university shall designate an individual to serve as the liaison with the System Records Retention Officer to ensure component university compliance with State Records Retention Requirements.
- 2.6. This policy relates to both hard copy and electronic records equally, including e-mail.

3. DOCUMENT IMAGING REQUIREMENTS FOR ALL UNIVERSITY BUSINESS TRANSACTIONS

- 3.1. Scanned images and electronic files used as backup documents for university business transactions must meet the following requirements:
 - 3.1.1. Minimum scanning resolution of 300 dpi X 300 dpi (dots per inch), black and white.
 - 3.1.2. File type of TIF, PDF, RTF, TXT, Word, or Excel.
 - 3.1.3. All information necessary for transaction approval must be legible on the scanned image or electronic file.
- 3.2. Review of scanned images.
 - 3.2.1. The person who scans the image will verify that the image is legible before it is uploaded to PeopleSoft or other institutional system to avoid uploading inadequate images.
 - 3.2.2. The person who uploads the scanned image will verify it can be opened and is legible after it is uploaded as well.
 - 3.2.3. The final approver of the transaction will also verify that the uploaded image is acceptable. If not acceptable, the image will be made "Inactive" and the transaction initiator will be required to rescan and upload the backup document.

4. UNIVERSITY BUSINESS DOCUMENTS WITH SECURITY SENSITIVE INFORMATION
 - 4.1. The following information is considered security sensitive, and should not be included on documents uploaded to PeopleSoft or other institutional system unless otherwise noted in Section 4.3 below:
 - 4.1.1. Social security numbers;
 - 4.1.2. Bank account numbers;
 - 4.1.3. Credit card numbers; and
 - 4.1.4. Intellectual property or research data that could be considered proprietary, though this information is normally not included as backup to financial transactions.
 - 4.2. Security sensitive information should be hidden on all documents uploaded to PeopleSoft or other institutional system (except those noted in Section 4.3.) in one of the following ways:
 - 4.2.1. Make a copy of the document to be scanned, mark through the security sensitive information on the copy so it cannot be read, and scan the copy.
 - 4.2.2. Scan the original document and mark the scanned image on the computer using the tools available in TIF (or Adobe Acrobat Writer for a PDF) before uploading the image to PeopleSoft or other institutional system.
 - 4.2.3. If the original document will not be preserved, mark through the security sensitive information on the original document before it is scanned.
 - 4.3. Security sensitive information should not be hidden on the following documents:
 - 4.3.1. IRS forms and tax-related documents with social security numbers required as backup to university business transactions should be uploaded with all information shown. When the document is reviewed for approval, Finance will designate the documents as “security sensitive” to hide them from view.
 - 4.3.2. Vendor setup forms with social security numbers or bank information should be faxed to the UH Accounts Payable vendor maintenance group directly, but should not be included in voucher backup. Vendor setup forms will be hidden from most people because they are stored on vendor pages where a limited number of people have access.

4.4. Access to view “security sensitive” documents will only be granted to individuals in Finance who must review and approve the associated transaction, internal and external auditors, and others with a need to view this information, as determined by the component chief financial officer or designee.

5. RETENTION REQUIREMENTS FOR ORIGINAL DOCUMENTS UPLOADED TO PEOPLESOFT OR OTHER INSTITUTIONAL SYSTEM

5.1. All original documents and files that are scanned and uploaded to PeopleSoft or other institutional system (i.e., hard copies of original documents) may be discarded after the associated financial transaction has posted or completed its final approval, whichever is later, except in the following circumstances:

5.1.1. Documents for transactions that are pre-approved for payment and reviewed for adequate documentation afterwards should be maintained in the department’s files at least one week after payment is issued to allow adequate time for review.

5.1.2. Original IRS or other government documents that must be mailed or maintained in their original form.

5.2. Documents that cannot be uploaded to PeopleSoft or other institutional system because they exceed the maximum file size (60 MB) must be maintained in the files of the originating department for the period indicated in the records retention schedule.

6. CORRESPONDENCE

Correspondence shall be categorized into one of the following four categories as defined below: Administrative Correspondence, General Correspondence, Directives and Transitory Correspondence. This categorization is independent of media form and applies equally to electronic and paper records.

6.1. Administrative Correspondence is defined as incoming/outgoing and internal correspondence pertaining to the formulation, planning, implementation, interpretation, modification, or redefinition of the programs, services, or projects of the system and/or a component university, as well as the administrative regulations, policies, and procedures that govern them. Administrative correspondence must be retained for 4 years.

For further information, see the [Texas State Records Retention Schedule](#), item 1.1.007.

- 6.2. General Correspondence is defined as any non-administrative incoming/outgoing and internal correspondence, pertaining to or arising from the routine operations of the policies, programs, services, or projects of the System and/or a component university. General correspondence must be retained for 2 years.

For further information, see the [Texas State Records Retention Schedule](#), item 1.1.008.

- 6.3. A Directive is defined as any document that officially initiates, rescinds, or amends university or general office procedures. Directives must be retained for 1 year past the date they are superseded.

For further information, see the [Texas State Records Retention Schedule](#), item 1.1.010.

- 6.4. Transitory information is defined as records of temporary usefulness that are not an integral part of a record series, and that are required only for a limited period of time for the completion of an action. Examples include routine messages, telephone message notifications, internal meeting notices; routing slips, incoming letters or memoranda that add nothing of substance to enclosures; and similar routine information used for communication, but not for the documentation, of a specific university transaction. Transitory records do not need to be retained beyond the time of their usefulness.

For further information, see the [Texas State Records Retention Schedule](#), item 1.1.057.

7. LEGAL HOLDS

- 7.1. When litigation against the System or its employees is filed or threatened, the law imposes a duty upon the System to preserve all documents and records that pertain to the issues. When the System Office of General Counsel is made aware of pending or threatened litigation, a legal hold directive will be issued to the legal custodians.

A legal hold directive overrides this records retention policy, as well as any records retention schedules that may have otherwise called for the transfer, disposal or destruction of relevant documents, until the hold has been cleared by System Office of General Counsel.

No employee who has been notified by System Office of General Counsel of a legal hold may alter or delete or destroy any records that fall within the scope of that hold. An employee notified by System Office of General Counsel of a legal hold will be required to provide copies of the referenced documents or electronic records that the employee has downloaded and saved or moved to some other storage account or device.

7.2. When an open records request (or [Public Information Act](#) request, also known as a Freedom of Information Act Request) is pending, documents must be maintained while the request is pending.

8. REVIEW AND RESPONSIBILITY

Responsible Party: Associate Vice Chancellor for Finance

Review: Every three years on or before March 1

9. APPROVAL

Approved: Jim McShan
Interim Vice Chancellor for Administration and Finance

Renu Khator
Chancellor

Date: July 28, 2015

REVISION LOG

Revision Number	Approval Date	Description of Changes
1	05/15/1992	Initial version
2	04/12/1998	Changed from “public” to “state” in text. Removed date of UHS Records Retention Schedule for Section 2.3, and revised text to reflect current operating requirements
3	11/30/2005	Applied revised SAM template to meet current documentation standards. Revised Section 2.1 to cite Texas Government Code 441.183 requirements. Revised Section 2.2 to cite Texas Administrative Code Title 13 requirements. Changed certification of the schedule to every three years in Section 2.3. Removed Sections 2.4 and 2.5. Added Section 3 on scanning requirements, Section 4 on financial documents with security sensitive information, and Section 5 on retention requirements for original documents updated to the Finance System. Added Associate Vice Chancellor for Finance to responsible party. Changed review period from even numbered years on or before April 1 st to every three years on or before April 1 st . Added Vice Chancellor for Finance and Administration to approval process. Added scanning to Section 8, Indexing Terms.

Revision Number	Approval Date	Description of Changes
4	12/03/2010	Applied revised SAM template to meet current documentation standards. Revised Section 1 to outline the principles and policies for records retention. Added Sections 2.5 and 2.6 on liaisons from the component universities, and added hard copy, electronic records, and e-mail to policy. Changed “Financial” to “University Business” in Sections 3 and 4. Added PeopleSoft to Section 4 and 5, replacing “Finance System.” Added Section 6 on correspondence information. Changed review period from every three years on or before April 1 st to every three years on or before March 1 st . Removed Section 8, Indexing Terms
5	07/28/2015	Added new Revision Log. Added link to UHS Records Retention Schedule to Section 2.3. Changed the time period from three years to five years in Section 2.3 for updating the retention schedule. Revised administrative correspondence retention from 3 years to 4 years in Section 6.1. Revised general correspondence retention from one to two years in Section 6.2. Changed the Retention Schedule reference to Item 1.1.010 in Section 6.3. Changed “correspondence” to “information” in Section 6.4 per the Texas State Records Retention documentation. Added information on transitory information reference in Section 6.4. Revised “System General Counsel” to “System Office of General Counsel” in Section 7.1