

Missouri Western State University

Policy Name: Record Retention and Disposal	Responsible Office: Finance and Administration
Policy Category: Compliance and Governance	Approving Authority: Board of Governors
Date Effective: August 13, 2026	Date Last Reviewed/Revised:

I. Purpose

The purpose of this policy is to provide guidance for the systematic review, retention, and destruction of documents received or created by Missouri Western State University in connection with the transaction of University business. Failure to properly maintain Records may expose the University and individuals to legal risks.

II. Applicability

This policy applies to all employees and to all records that are made or received in the transaction of University business. Records exist on a variety of media, including, but not limited to paper, electronic media, and physical objects and in a variety of forms including, but not limited to word documents, spreadsheets, database entries, electronic calendar appointments, and electronic messaging technologies.

This policy applies to all records and documents regardless of physical form and contains guidelines for how long certain documents should be kept and how records should be destroyed (unless under a legal hold).

III. Definitions

Record. A Record on any medium may constitute a public Record subject to disclosure under the Missouri Sunshine Law, other laws, or as a result of litigation. A “record” is defined as any “document, book, paper, photograph, map, sound recording or other material, regardless of physical form or characteristics, made or received pursuant to law or in connection with the transaction of official business” (Section 109.210(5) RSMo). This definition includes those records created, used, and maintained in electronic form.

Records Retention - the prescribed period of time that a Record must be retained. The retention periods established for University Records are based on the legal, administrative, financial, research, and historical needs of the University.

University Non-Records – include the following:

- Extra copies of documents preserved only for convenience of reference.
- Stocks of printed or reproduced documents kept for supply purposes where file copies have been retained for Record purposes.

- Books, periodicals, newspapers, posters, and other materials made or acquired and preserved solely for reference or exhibition purposes.
- Private materials neither made nor received by a University staff member in connection with the transaction of University business.
- Duplicate microfilm of University Records.
- Paper copies of scanned images provided appropriate quality control procedures have been followed.
- Tapes, cassettes, CDs, or DVDs provided that the documents containing the same information have been retained or approved for disposal.
- Material not filed as evidence of department operations or for its informational value such as telephone call slips, letters of transmittal, route slips, etc.
- Dictation tapes, machine tapes, and mechanical Records, which have been transcribed into electronic or printed form.
- Preliminary drafts of letters, memoranda, reports, work sheets, and informal notes, which do not represent significant basic steps in the preparation of the Record document.

University Records - any papers, e-mails, electronic Records, electronic images, maps, photographs, original microfilm, or other documentary materials regardless of physical form or characteristics, made, produced, executed or received by any academic or administrative staff member in connection with the transaction of University business or maintained as evidence of the organization's functions, policies, decisions, procedures, operations, or other activities of a University department or business unit. ***Note:** University Records are defined separately from Non-Records. However, if there is any doubt as to whether or not any item is a Non-Record, it will be considered to be a University Record.*

Vital Records - all University Records designated as vital or essential to the continued operation of the University and which if destroyed would seriously impair or disrupt normal University affairs, or which by their loss might place the University in a state of legal or fiscal jeopardy, are to be secured for long-term storage.

IV. Policy

The University has an obligation to make and maintain records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the University designed to furnish information to protect the legal and financial rights of the state and of persons directly affected by the University's activities. The retention requirements shall be binding on all University academic and administrative departments and staff. Records Retention schedules apply to all Records in all departments of the University. University Records are the property of Missouri Western and not of the officers, faculty members or employees who create them or to whom they are entrusted.

At a minimum, Records shall be retained following the [Department of Higher Education and Workforce Development - University General Retention Schedule](#) included within the [State of Missouri Agency Records Retention Schedules](#). To access this schedule, visit the Missouri Secretary of State website and the Agency Records Retention Schedules. Once on this page, expand **Department of Higher Education and Workforce Development**, then select **University**

General Retention Schedule. The retention periods set forth in the **University General Retention Schedule** are the minimum retention periods required by the University. At the conclusion of the retention period, the Records should be properly disposed of under this policy.

V. Procedures and Implementation

A. Shared Responsibility

No one person or unit can be directly responsible for all University Records. Therefore, every office or department managing University Records is responsible for:

- Implementing records management practices consistent with this Policy.
- Educating staff in the Records management practices.
- Preserving Records as required under this Policy.
- Properly disposing of Inactive Records at the end of the applicable retention period.
- Protecting Records against misuse, misplacement, damage, destruction, or theft.
- Monitoring compliance with this Policy.

To the maximum extent practicable, all employees and officials of the University with responsibilities for the creation, retention, maintenance, and destruction of Records of the University should endeavor to capture paper records electronically and enact measures to ensure that the records of the University are electronic and not paper based.

C. Confidential Records

The University receives and holds confidential information of various sorts, some of which it is precluded from divulging by law except in limited circumstances, such as: student records, or medical records, and some of which it does not divulge as a matter of policy, such as: personnel information, purchasing records prior to the opening of Bids or prior to the award of contracts resulting from Requests for Proposals, proprietary information, or information the University has contractually agreed not to disclose.

No officer or employee shall permit the disclosure or use of such confidential information without proper authorization. Any officer or employee violating this policy may be subject to disciplinary action.

D. Litigation Holds

When litigation against the University or its employees is anticipated or filed, the University may have legal obligations to preserve documents and Records that pertain to the issue. When appropriate, the Office of General Counsel will issue a Litigation Hold directive to applicable employees. The Litigation Hold directive overrides any Records Retention schedule that may have otherwise called for the transfer, disposal, or destruction of the relevant documents until the hold has been lifted by University Counsel. E-mail and computer accounts of current and separated employees that have been placed on a Litigation Hold by University Counsel will be maintained by the central IT department until the hold is released.

No employee who has been notified by University Counsel of a Litigation Hold may alter or delete any Record, paper or electronic, that falls within the scope of the hold. Violation of the Litigation Hold may subject the individual to disciplinary actions, up to and including dismissal, as well as civil and/or criminal sanctions by the courts or law enforcement agencies.

E. Electronic Mail

All employees must use a University provided or approved e-mail, messaging and calendaring system or service(s) to conduct University business. E-mail, calendar appointments and other forms of electronic communications, such as instant messaging, may create Records. When such communications create a Record, the Record(s) must be retained for the required retention period. Records stored electronically or printed must be retained according to Record retention policies. E-mail that does not meet the definition of a Record (e.g., personal or junk e-mail) should be removed from the system.

F. Email Record Guidelines

An email message constitutes an official record only when the document is made or received in connection with the transaction of University business. An email that provides evidence of a department's activities, events, or business transactions for operational, legal, regulatory, and/or historical purposes is most likely a Record. (See Appendix A for additional information on determining if a message is a record.)

G. Record Disposal

Records may be disposed when they have met retention requirements per the approved disposition schedule by the State Records Commission/Missouri Secretary of State's Office, unless the University has identified a longer period or retention or a Litigation Hold is active and in place. Employees should follow the below guidelines when determining when and how a Record may be disposed.

1. To determine when records may be disposed of, add the retention time to the year of the record plus one year (months are normally ignored when computing retention time). For records that cover more than one period, such as fiscal years, use the latest time period for the year of record. For example, for 1990-91 records, 1991 would be the year of record.
2. Records which are not of a confidential or sensitive nature should be disposed of by means of regularly established departmental practices for handling recycled or waste paper.
3. Records which are of a confidential or sensitive nature should be disposed of by any method making record recognition impossible or by disposing of such Records using a designated confidential shred bin. The University utilizes external vendors for the disposal of confidential or sensitive records through designated pick-up dates, times and locations. Determination of what constitutes confidential or sensitive records is the responsibility of the department.

Date of Review/Revision	Summary of Change

APPENDIX A

Identifying University Records Guidance Document

What is a Record?

Official records are any documentation related to the department's official duties or activities. Examples of records may include:

- When it records official decisions
- When it records or communicates discussions about policies, programs, and program delivery
- When it contains background information used to develop other University documents such as studies, reports, or position papers
- When it documents a business transaction
- It proves a business-related event, or activity did or did not occur
- When you need to identify who participated in a business activity or had knowledge of an event
- When it has business, operational, legal, regulatory, or historic value to the University
- When it has legal or compliance value
- When it could help resolve a dispute in the future

Ask Yourself These Questions:

- Do you need the email to document a business activity or transaction?
- Do you need the email to prove a business-related event, or activity did or did not occur?
- Do you need the email to identify who participated in a business activity or had knowledge of an event?
- Does the email have legal or compliance value?
- Do you need the email to support facts you claim to be true, since the person with the direct knowledge of the facts is not available?
- Could it help resolve a dispute in the future?
- Does the law expect that the University will retain it?
- If it were in paper form, would it be retained?
- Are you the creator of the email?
- Is the information stored in another application or system? Is this a duplicate record that can be destroyed?

APPENDIX B

Best Practices for Retention Guidance Document

How Long Should I Keep It?

Required retention periods typically fall into one of three categories:

Transitory Retention - these, by definition, are non-records and have very little administrative value. They are records of temporary usefulness that are not an integral part of a department's records series, which are not regularly filed in a department's recordkeeping system, and that are required only for a limited period of time for the completion of an action or in preparation of an on-going records series. Transitory records are not essential to the fulfillment of statutory obligations or to the documentation of department functions and need to be deleted or destroyed as soon as they no longer provide administrative value.

- Examples: Routine messages, internal meeting notices, and reminders, “Out of office” notes, drafts, work group discussions, administrative notices, courtesy copies, other messages that serve to convey information of temporary importance in lieu of oral communication.
- Retention: Until no longer of administrative value, then destroy.

Intermediate Retention - Email that has more significant administrative, legal, and/or fiscal value.

- Examples: Internal correspondence requesting information, monthly and weekly reports, documents advising supervisors of various events, issues, and status or on-gong projects, correspondence from various individuals, companies, and organizations requesting information, copies of meeting minutes (excluding the official copy of the minutes).
- Retention: Retain for the appropriate period of time defined in the record retention schedule and then destroy.

Permanent Retention - Email that has significant administrative, legal, and/or fiscal value and are scheduled as permanent.

- Example: Executive correspondence pertaining to the formulation, planning, implementation, interpretation, modification, or redefinition of programs, services, or projects and the administrative regulations, policies and procedures that govern them; department policies and procedures, which include reports and policy studies; official copy of meeting minutes.
- Retention: Retain for the appropriate period of time defined in the record retention schedule and then transfer to Archives.

Non-Records or Redundant, Obsolete or Trivial/Transitory Information (ROT)

Non-Records or ROT are materials that do not contribute to an understanding of the department's operations or decision-making process. They are materials that have no substantial administrative or operational value. Non-Records or ROT also include extra copies of official records retained elsewhere that serve as:

- Convenience copies kept solely for ease of access and reference.
- Information/Reference copies of records sent to individuals or departments that are interested in, but not acting upon, the information.
- Technical reference documents needed for general information.
- Diaries and journals not prepared for transaction of official business.
- Papers accumulated by an employee prior to employment with the department.
- Privately purchased books and publications that do not relate to official business.

You may dispose of non-record materials when you no longer need them.

Best Practices for Deletion or Destruction of Electronic Non-Records (ROT)

1. Deleted items – Empty deleted items and recycle bins. If that makes you too nervous, delete all but the last 30 days of deleted items.
2. Calendar responses in your email – Invitations, acceptances, meeting announcements, meeting agendas, Zoom invitations, and other scheduling notifications. Your calendar will still contain the relevant information so you can delete the responses received in Outlook.
3. Published reference material – If you did not create the publication, delete it as soon as it is no longer relevant or needed. This includes notifications from other departments, external sources, magazines, flyers, announcements, etc. If you created them, make sure a copy of the publication is maintained consistent with the record retention schedule.
4. Newsletters/Listservs – Including internal and external newsletters, as long as you did not create them.
5. Formal and informal announcements – System outages, drills, routine IT maintenance work, donuts in the break room, etc.
6. Duplicates and Drafts– Delete duplicate records that are recorded in multiple systems or locations and drafts (emails and documents) that are no longer needed.
7. Folder Clean-up – Delete folders on your shared drive, SharePoint, Google Drive, or Outlook that have met or exceeded their approved retention period.
8. Extracted information – reports that are printed from a database that can be recreated as needed.
9. Personal emails – Anything unrelated to University business
10. Sent items – Sort your sent items and delete any emails that are not needed. Sort by date, subject, to, and attachments to make this task simpler.