Name of Policy	Retention and Disposition Policy
Description of Policy	Define data retention standard for CITS accounts
Policy applies to	☒ University-wide ☐ Specific
	☐ Staff only ☐ Students only ☒ Staff and students
Policy status	☐ New policy ☒ Revision of existing policy

Approval authority	Center for Information Technology Services
Governing authority	Finance and Administrative Services
Responsible officer	Chief Information Officer

Approval date	
Effective date	November 1, 2022
Approval date of last revision	February 20, 2019
Effective date of last revision	February 20, 2019
Date of policy review*	November 1, 2025

**unless otherwise indicated, this policy will still apply beyond the review date*

Related legislation, policies, procedures, guidelines and local protocols	

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1. Background

Records that are kept past the required retention period pose a risk to the University. When record retention schedules are followed proactively, they help to avoid risks and preserve resources. Employees have an obligation to properly dispose of records that they are not obligated to retain and/or no longer serve a legal, operational, or historic value. Following records retention schedules and the procedures in this policy supports the University's enterprise risk management goals.

2. Purpose

This policy establishes the retention period of data within systems owned by CITS and for which CITS is responsible for the disposition of deleted data. This includes system access and log files that are a routine record of events on systems

3. Scope/Application

This policy addresses user data that has been deleted by the user from the system as well as system access and log files that provide hardware or operating system event data used to diagnose problems. This policy does NOT include retention of data records not owned by CITS such as financial records, Human Resource documents, student records, and health data, which are governed by specific legal requirements and under the purview of those departments.

4. Policy Statement and Principles

Litigation Hold

When CITS receives a litigation hold for electronic data, the data and email, as well as any associated backups as of the day of the hold, are copied and quarantined. Any backup retention policies that would delete files older than 30 days are removed so that files are retained. At the time, the University is required to supply electronic documents, data from the frozen copies and any relevant data from the intervening period. Circumstances from each case will dictate the parameters of the data required.

Data Retention

CITS has a document outlining the retention of system logs, responsible party and location.

User data, for the purpose of this document, refers to data or emails that have already been deleted by the user. User data is retained via backup copies for a period of 2 years. When an employee either retires, is terminated, or resigns, his/her Active Directory account will terminate on the date that the employee is no longer employed by the University. Data that resides on user desktops/laptops is retained until that computer is decommissioned or another employee takes over the workstation, then that computer is reimaged to erase all previous data. Data that resides on CITS-provisioned storage (shared network drives) is retained via backup copies for a period of 2 years

Student network accounts will be deleted one year after the student's last full semester at the University.

5. Roles and Responsibilities

The retention of data and determination of useful retention of system logs is determined by system administrators under the direction of the Director of Enterprise Architect. System administrators and database administrators are responsible for the execution of retention and adherence to the schedule.

6. Revision made to this Policy

- Lower the account and data retention period from 5 to 2 years in accordance with US Code of Regulations Title 16 Chapter 1 Subchapter C Part 314.4
- Create student account retention policy.

REVIEWED BY:

/s/ Cornelius Wooten, Ph.D. October 13, 2022

Senior Vice President for Finance, Administrative Services and Operations/CFO — Date

/s/ Alfred L. Galtney, J.D. October 13, 2022

Chief Compliance Officer — Date

APPROVED:

/s/ Felecia M. Nave, Ph.D. October 13, 2022

President/IEO — Date