
SUBJECT: Records Retention Policy

1.0 PURPOSE

1.1. This policy establishes requirements for the retention, storage, and disposal of College documents and data in compliance with the Utah Government Records Access and Management Act (GRAMA), Utah State Archives retention schedules, and applicable federal regulations. The purpose is to ensure that Snow College retains records for appropriate periods, supports operational needs, protects institutional information, and disposes of records securely and lawfully.

2.0 DEFINITIONS

- 2.1. Record: Information created, received, or maintained by Snow College in any format (paper, electronic, audio, video, email, database, etc.) that is required to be retained to comply with Utah law, approved records retention schedules, or documented College business needs. College business needs refers to information that documents official actions, decisions, transactions, or obligations of the College and is necessary to support operations, accountability, legal compliance, or historical reference. Emails are deemed a record only when it documents official business, decisions, or commitments. Records do not include purely transitory communications, drafts, or routine correspondence that do not document official decisions, actions, or obligations.
- 2.2. Retention Schedule: A list that specifies how long a particular record type must be kept and the manner of final disposition.
- 2.3. GRAMA: Utah Government Records Access and Management Act (Utah Code Title 63G, Chapter 2), which governs classification, retention, access, and destruction of public records.
- 2.4. Permanent Record: Records that must be preserved indefinitely per Utah State Archives.
- 2.5. Transitory Record: Short-term records with temporary value that may be disposed of once administrative need ends.
- 2.6. College Records Officer: Shall be the Vice President of Finance and Administrative Services unless delegated to another person.

3.0 POLICY

- 3.1. Compliance with State Law
- 3.1.1. Snow College follows all federal requirements and Utah State Code Title 63G-2 Government, Records, Access and Management Act (GRAMA) governing the retention, access, storage, and destruction of records. The College may charge fees for the search, retrieval, and staff time associated with filling records requests, as permitted under

Utah State Code Title 63G-2.Snow College adopts the Utah State Archives General Retention Schedules as its baseline standard for records retention..

3.2. Retention Requirements

3.2.1. Each College division must maintain records according to the retention periods listed in the Snow College Retention Schedule (Snow College website). Departments may retain records longer for operational need but may not destroy records earlier than the minimum legal requirement. It is important to acknowledge that different record types have different retention requirements and academic materials, drafts, and instructional content may often fall into transitory or non-record categories unless tied to official actions.

3.3. Storage and Security

3.3.1 Records must be stored securely in compliance with Utah data privacy expectations and College information security standards. Electronic records must remain readable and accessible for the full retention period. For physical records, “secure storage” includes keeping records in controlled-access areas (e.g., locked offices or locked file cabinets) when not in active use, particularly for records containing confidential or protected information. For electronic records, appropriate safeguards must be used, such as access controls, authentication, and storage on College-approved systems, to ensure records remain secure, readable, and accessible for the full retention period.

3.4. Disposal and Destruction

3.4.1. Records may only be destroyed after:

- 3.4.1.1. the required retention period has been met, and
- 3.4.1.2. the records are not subject to litigation, audit, or a pending GRAMA request.

3.4.2. Paper records must be shredded; electronic data must be securely deleted.

3.5. Litigation Hold

3.5.1. Any record subject to litigation, audit, or investigation must not be destroyed regardless of scheduled retention period until the hold is lifted by College legal counsel.

3.6. Responsibility

3.6.1. Each department director is responsible for ensuring compliance. For purposes of this policy, department director includes department chairs or other individuals formally designated as the administrative

lead of an academic or operational unit. Department directors may delegate day-to-day records management responsibilities within their unit but remain accountable for overall compliance.

- 3.6.2. The College Records Officer provides guidance, training, updates, and coordination with the Utah State Archives.