

## Record Retention: Destruction of Records Guideline

**Function:** Office of Compliance Services  
**Procedure:** Record Retention Schedules: Account Expenditure Records, Person-related Records, Project Administration Records, Technology Transfer Records  
**Contact:** [rcompliance@rfsuny.org](mailto:rcompliance@rfsuny.org)

### Guideline Recommendations

The following guideline provides practical advice on the physical destruction of hardcopy and digital Research Foundation records.

#### Destruction of Records

Records destruction should be:

- I. Authorized;
- II. Appropriate;
- III. Secure/confidential;
- IV. Timely; and
- V. Documented.

Before the records of destruction can occur, the following must take place:

- I. The Records must be authorized for destruction in accordance with the requirements of Record Retention Schedule.
  - There is no active or pending litigation, audit, FOIL request, or appeal of a FOIL request, that involves the Record(s) in question.
  - The Records are no longer required under any other legislation, and all statutory and regulatory, and sponsor requirements are fulfilled.
- II. The Record must be appropriately destroyed.
  - Destruction of Records should be irreversible, with no reasonable risk of the Information being recovered again.
  - Paper Records can be shredded or recycled, while data stored on electronic hardware may require Secure Erase or physical destruction (contact [customerservices@rfsuny.org](mailto:customerservices@rfsuny.org) for assistance).
- III. Records should be disposed of with the same level of security that was maintained during the lifetime of the Record.
  - Extra care should be given to Records containing Confidential Information.
- IV. Records should be destroyed once they are of no further administrative or business use, pursuant to the appropriate Record Retention Schedule.
  - While Records should not be destroyed while there is still a need for them, it is also important not to keep Records longer than necessary.
  - If a decision is made to retain Records longer than the minimum retention period, a Record of the reasons for the decision should be documented to assist destruction at a later time.
- V. The date and method of destruction should be documented, where appropriate.

## **Archives**

Records may be archived in circumstances where the minimum retention period has not been met, but there is no further administrative use. Once all requirements for retaining Records have been met, the Record should be destroyed.

## **Definitions**

*Information* - any communication or reception of knowledge regarding the RF and includes facts, data, or opinions that may consist of numerical, graphic, or narrative forms, whether oral, downloaded to equipment, or maintained in mediums, including, but not limited to, computerized databases, papers, microfilms, magnetic tapes, disks, CDs, flash drives, and cell phones.

*Confidential Information* - any RF "Information" as described above that specifically identifies and/or describes an employee, an employee's Protected Health Information, and/or RF organizational information, which if disclosed or released, a reasonable person would conclude that negative financial, competitive, or productive loss may occur and/or may cause legal or other non-beneficial impacts on the RF. It also includes information regarding any proprietary or licensed technology or Information that has been provided to the RF by another party for which the RF has confidentiality obligations. Confidential Information does not include grant and contract proposal information released to sponsors and project partners as part of a formal submission, subsequent award information, and correspondence received from or sent to those parties.

*Record(s)* - Any information kept, held, filed, produced, or reproduced in any form whatsoever, including electronic, by or on behalf of the Research Foundation or Research Foundation employees, in their capacity as employees of the Research Foundation. Records include, but are not limited to: reports; statements; examinations; memoranda; opinions; folders; files; books; manuals; pamphlets; forms; papers; designs; drawings; maps; photos; letters; microfilms; computer tapes or discs; rules; and regulations or codes, in connection with the transaction of Research Foundation business.

*Secure Erase* - Process by which software is used to overwrite data multiple times so that recovery is not possible.

## **Related Information**

[Records Management Policy](#)

[Electronic Record Management Policy](#)

[Confidential Information Policy](#)

[Record Access Policy](#)

[Record Retention: Account Expenditure Records](#)

[Record Retention: Person-related Records](#)

[Record Retention: Project Administration Records](#)

[Record Retention: Technology Transfer Records](#)

## Change History

Date	Summary of Change
March 22, 2022	Added link to new Record Retention: Technology Transfer Records Schedule.
February 18, 2022	New Document.

### Feedback

Was this document clear and easy to follow? Please send your feedback to [webfeedback@rfsuny.org](mailto:webfeedback@rfsuny.org).