

Summary of Guidance on Destruction of Confidential Records

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Introduction:

This FAQ provides general information regarding the destruction of confidential information at Penn (both the University and UPHS).

Under what circumstances should confidential information be destroyed?

Information should be destroyed when *all* four of the following requirements are met:

- (1) the information is "confidential" according to Penn's Guidelines;
- (2) the information has been kept for as long or longer than the period required by the records retention schedule;
- (3) there is no actual or likely claim, lawsuit, government investigation, subpoena, summons or other ongoing matter involving such records (The University and UPHS do not knowingly destroy or discard evidence. Records relevant to a legal action cannot be destroyed or discarded without the approval of the Office of General Counsel; if there is such likelihood, preserve the integrity of the documents and contact the Office of General Counsel); and
- (4) the destruction is *jointly* authorized by the senior officer of the administrative or academic office of origin and by the Director of the University Archives and Records Center.

What qualifies as confidential information as it relates to records destruction?

The following information is ordinarily considered confidential:

- records whose usage might constitute an invasion of privacy;
- student records, employment records, and health records; or
- records whose use has been restricted by contract.

What qualifies as "as long or longer than the period required by the records retention schedule"?

Penn's records retention schedules are viewable online. Some frequently applicable retention periods are:

- admissions records: 10 years
- class schedules: transfer to UARC after 2 years; permanent
- personnel/employment files: 7 years from termination
- financial aid records: 5 years after annual audit has been accepted
- foreign student forms (I-20): 5 years after graduation or date of last attendance
- student academic files (departmental): 5 years
- accounts payable and receivable, books of accounts, banking records: 7 years
- payroll and other tax-related records: 7 years

- most research-related records: 7 years after completion of research
- UPHS medical records/charts: 21 years from date of last treatment; for minors, 21 years from age 18

What does it mean to “destroy” information under Penn’s Guidelines?

Information is destroyed under Penn’s guidelines if it is handled under methods that do not permit recovery, reconstruction and future use. The destruction methods depend upon how the information is contained:

- *Paper Records:* Shred or pulp the paper. Don’t simply throw it in the trash.
- *Electronic or machine-readable records:* First, delete the contents of digital files and empty the desktop trash. Second, for hard drives, use commercially available software applications to remove all data from the storage device. Physically destroy floppy disks or back-up tapes.
- *Film, audio, and videotapes:* Physically destroy these tapes. Don’t simply throw them away.

How should I destroy confidential information?

Penn offices should contact the University Records Center (URC) to arrange for safe and secure destruction of confidential records. The URC understands the destruction procedures thoroughly and has extensive experience in managing these issues. The URC’s vendor relationship is University-wide and affords Penn offices a simple, lower-cost approach to records destruction.

How do I contact the University Records Center?

The URC may be reached by telephone at (215) 898-9432, by fax at (215) 573-2035, or by e-mail at uarc@pobox.upenn.edu.

How do I find out more?

For more detail, please see the Guidelines for the Destruction of Confidential Records and the Records Retention Schedule at www.archives.upenn.edu/urc/recdret/guide2.html.