University Records; Files Plans; and Retention Creating a Roadmap to Success
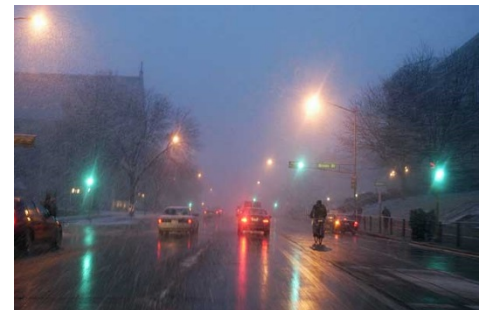
May 2017

Peg Eusch, CRM
University Records Officer

Today we will cover…

- What is a Record?

- What is Not a Record?

- Risks and Challenges in Managing Records.

- Why a Records Management File Plan?

- Record Retention and Disposition.

- Employee Responsibility for Records.

"records are the memory of your business, holding knowledge and evidence of commercial activities forgotten when people move on"

Barclay T. Blair, founder of the Information Governance Initiative

RECORDS = University Assets

State of Wisconsin: The 2 definitions of "record" are similar but not identical and they are not interchangeable.

Wisconsin Statute §16.61(2)(b) defines what constitutes "public" records for the purposes of the records retention obligations of state agencies.

Wisconsin Statute § 19.32 (2) defines what constitutes "public records" for the purposes of the access and disclosure mandate of the public records law.

Definition of a Record

University Records

Wis. Statue 16.61

If you answer **"YES"** to any of these questions, you have a university record:

- **Was the record created in the course of university business?**

- **Was the record received for action?**

- **Does the record document university activity?**

- **Is the record mandated by statute or regulation?**

- **Does the record support financial obligations or legal claims?**

- **Does the record communicate organizational requirements?**

Applies to all formats and media

Note: **Refrain from using work email for personal business.**

Non-Records
Wis. Stat. 16.61

- **Duplicates**

   Duplicates records which are maintained by a University employee only for convenience or reference and for no other substantive purpose.

- **Drafts, Notes, and Preliminary Computations**

   Draft documents **without** substantive comments, rough notes, calculations.

- **Unsolicited Notices, Invitations or Reference Materials**

   Unsolicited notices or invitations received by a University employee, which are not related to any official action taken, proposed, or considered by the University.

Just some facts……..

Information Cost Statistics

Up to 80% of IT infrastructure is used to support duplicate data.
(Source: "Big data: The next frontier for innovation, competition, and productivity." McKinsey Global Institute, 2011.)

70%-75% of IT budget is spent on infrastructure maintenance (to maintain and operate the organization, systems, and equipment).
(Source: "Debunking Two Myths About Tech Budgets," Forrester Research, 2014)

Storage cost per GB is down, but investment in infrastructure to support storage has doubled from $2.5 trillion to $5 trillion in the last seven years.
(Source: "IDC Digital Universe Study," IDC, 2011)

Cost to perform e-discovery on 1 TB of data is approximately $18,000.
(Source: "Where the Money Goes: Understanding Litigant Expenditures for Producing Electronic Discovery," Rand Corp., 2012)

The average information worker spends 48 to 72 minutes per day locating information. The opportunity cost of wasted time, based on $75,000 in annual salary and benefits per employee, is $19,372 per employee per year.
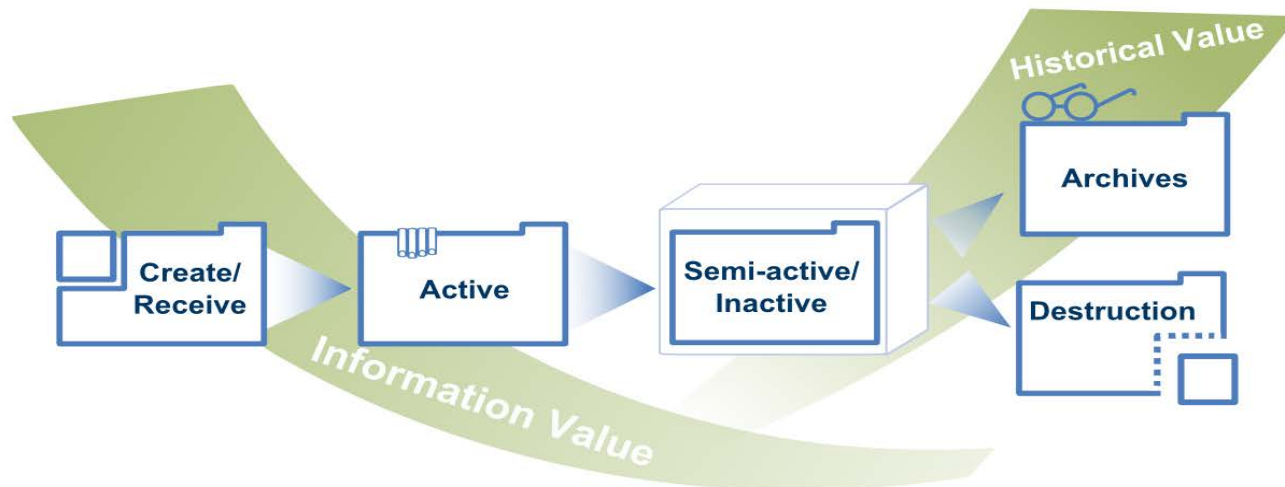(Source:"Bridging the Information Worker Productivity Gap," IDC, 2012)

Records Management is Risk Management

Putting systematic controls on our recorded information through the information lifecycle.

Choose to actively manage our university records.

https://archives.un.org/content/retention-policies

Risks and Challenges in Managing Records

- **The More Information = A Increased Risk**
  - Information Breeches
  - Information Loss / Misfiles
  - Longer Retention Times
  - Authenticity and Integrity Questioned

Types of Record Risk:
- Administrative Record Risk;
- Records Control Risk;
- Technology Risk
- Legal and Regulatory Risk

Information Silos

- Poor exchange of information
- Duplication of effort
- Factual inconsistencies
- No common standards

R & D   Marketing   IT Services   Training

Departments
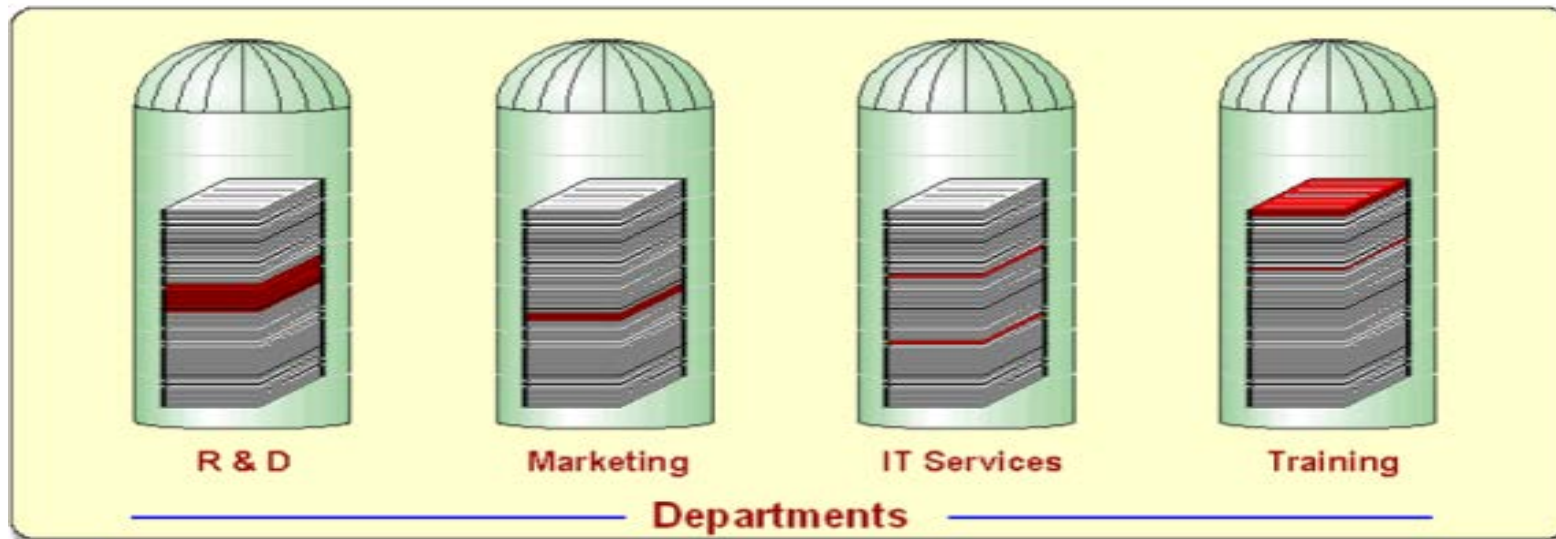
University Records Management Best Practices: *8 Principles*

"The Principles"
ARMA's **Generally Accepted Recordkeeping Principles** should be applied to all records whether they are physical format, electronic format or stored in the cloud.

"The Principles" = Campus Best Practice in Recordkeeping

THE UNIVERSITY
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- **A**ccountability
- **T**ransparency
- **I**ntegrity
- **P**rotection
- **C**ompliance
- **A**vailability
- **R**etention
- **D**isposition

Documentation of Records Management Practices – "Records Management File Plan"

A Record Management "**File Plan**" is a well thought out plan in how records are managed.

File Plans specify how records are to be organized and managed once they have been created through the records lifecycle.

They are an essential component that a Dept./Unit can utilize in management of university records for transparency.

Think of File Plans as a roadmap to how your Dept. or Units manages their records.

Good Records Management = Records Management File Plan

Transparency

Records Management File Plan Elements
Integrates with the Generally Accepted Recordkeeping Principles Framework

What
(Documents)

Who
(Custodian, Security and Access)

When
(Retention, Disposition)

Records Mgt File Plan

- Document Types
- Record Organization
- Compliance
- Record Custodian
- Security Classification
- Access Permissions
- Record Storage
- Office Rec Mgt Process
- Records Retention
- Records Disposition

Why
(Records Organization)

Where
(Record Storage)

How
(Records Process)

Document Types

- Identified through a records inventory.

- Identified through business process and workflow and records created.

- Dependent on the needs of the business.

Examples:

o Meeting Minutes

o A/P Invoices

o Purchase Cards

o Personnel Record

o Contracts

o Recruitment Records

Records Mgt File Plan

Document Types
Record Organization
Compliance
Record Custodian
Security Classification
Access Permissions
Record Storage
Office Rec Mgt Process
Records Retention
Records Disposition

Record Organization

What is a taxonomy?

Structure for classifying documents into a hierarchy of categories and subcategories
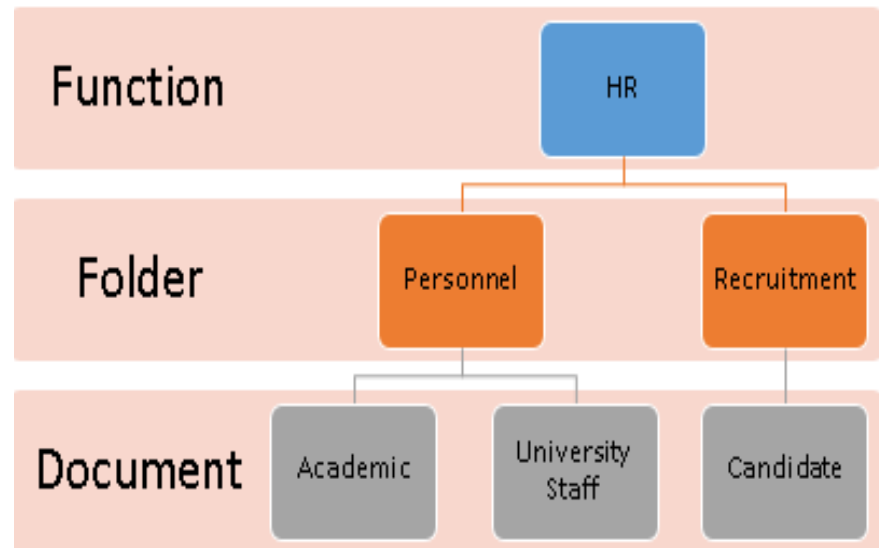
We start with a generalized term, and keep getting more specific.

Almost anything may be classified according to some taxonomic scheme, as long as there's a logical hierarchy.

Principle of Availability

Filing and Classification
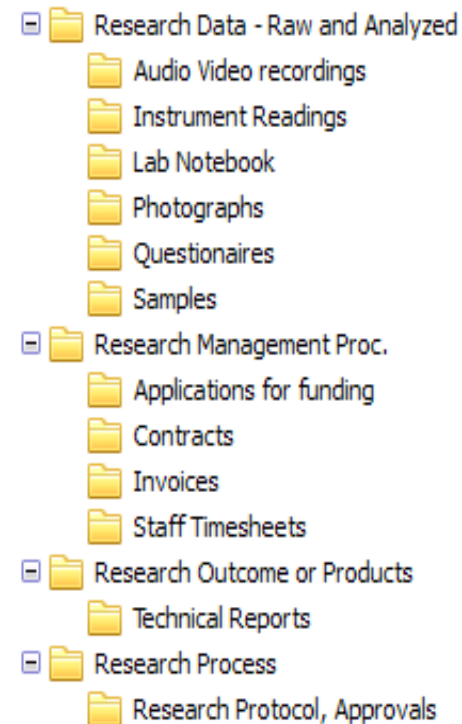
Classification of Records

- Classifying records requires planning and making decisions.

- Classifying records provides ways to identify, locate, retrieve and manage records.

- Metadata is structured information related to a record.

Uniform Naming Conventions

- Naming files for mutual understanding and collaboration.

Version Control

- Critical if there are a large number of drafts, duplicates, backup copies and templates.

- 📁 Research Data - Raw and Analyzed
  - 📁 Audio Video recordings
  - 📁 Instrument Readings
  - 📁 Lab Notebook
  - 📁 Photographs
  - 📁 Questionaires
  - 📁 Samples
- 📁 Research Management Proc.
  - 📁 Applications for funding
  - 📁 Contracts
  - 📁 Invoices
  - 📁 Staff Timesheets
- 📁 Research Outcome or Products
  - 📁 Technical Reports
- 📁 Research Process
  - 📁 Research Protocol, Approvals

Applied to:
- ❑ Electronic Documents (info)
- ❑ Shared Network Drives
- ❑ Email
- ❑ Collaborative – UW Mad Box, Google Doc etc.
- ❑ Paper

Records Compliance

Records Mgt File Plan
Document Types
Record Organization
Compliance
Record Custodian
Security Classification
Access Permissions
Record Storage
Office Rec Mgt Process
Records Retention
Records Disposition

EXTERNAL AGENCY Federal Req. RESEARCH Audits
Data Procedures Standards
Method Tests
Maps Reports Policies Protocols
E-discovery Contracts State Req. Agreements PII
Record Retention Schedules
HIPAA/FERPA

Principle of Compliance

Custodian

Records Mgt File Plan

- Document Types
- Record Organization
- Compliance
- Record Custodian
- Security Classification
- Access Permissions
- Record Storage
- Office Rec Mgt Process
- Records Retention
- Records Disposition

- The Records Custodian is the person responsible keeping records in the ordinary course of business with accountability for records.

- The Custodian is typically in an organizational leadership role.

- The Custodian should also be the Liaison to the University Records Officer.
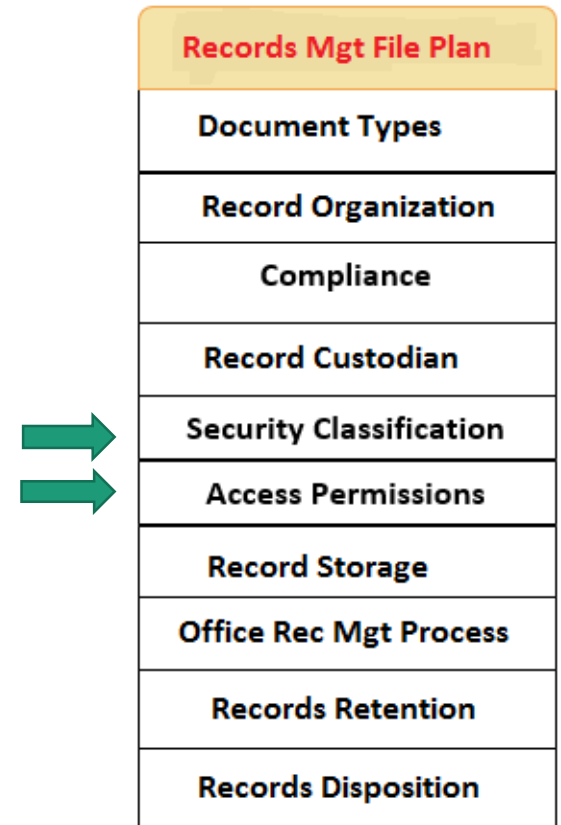
Security Classification and Access Permissions

- Understand the type of information that is being managed and that it has the proper safeguards applied.

- The information owner should identify information as restricted, sensitive, internal or public in order to determine what security controls should be considered.

- Only the minimum necessary rights should be assigned to a person to access, modify or delete information. Those rights and should be in effect for the shortest time necessary.

The security team in the Office of Cybersecurity can assess your department or units information risk.

https://it.wisc.edu/guides/cybersecurity-and-safety-principles

Records Mgt File Plan

- Document Types
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- Records Retention
- Records Disposition

STOP Restricted Data
CAUTION Confidential Data
GO! Non-Confidential Data

http://its.ucsc.edu/policies/data-usage.html

Where are Records Kept?

Records Mgt File Plan
Document Types
Record Organization
Compliance
Record Custodian
Security Classification
Access Permissions
Record Storage
Office Rec Mgt Process
Records Retention
Records Disposition

- Paper and electronic records are stored in many repository's
- Migration Plan for records – Wis. Adm. Rule 12
- Information backed up for Business Continuity – Vital Records
- Preservation plan for electronic records in system for more than 10 years.
- Media and file formats will continue to become obsolete

Availability, Integrity and Authenticity

Record Mgt. Process

Identify business processes and the records that are associated with that process.

To ensure the authenticity and integrity of information, a repeatable process should be employed.

Identification of how information is created and what happens to it, where is it stored?

Records Mgt File Plan
- Document Types
- Record Organization
- Compliance
- Record Custodian
- Security Classification
- Access Permissions
- Record Storage
- **Office Rec Mgt Process** ←
- Records Retention
- Records Disposition

Fig: Mapping Process to Records
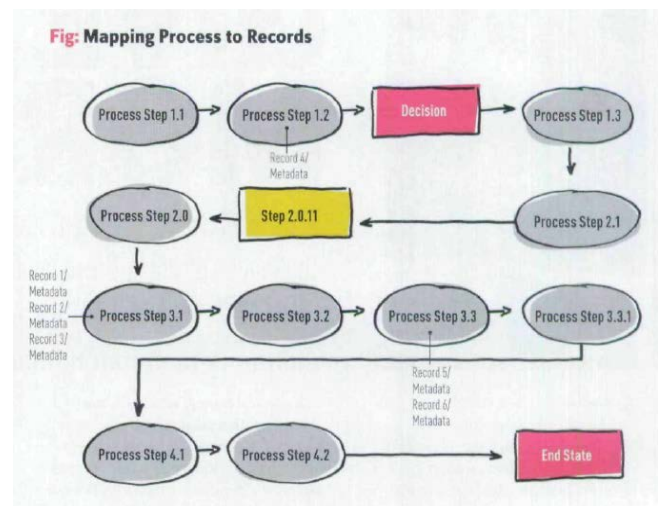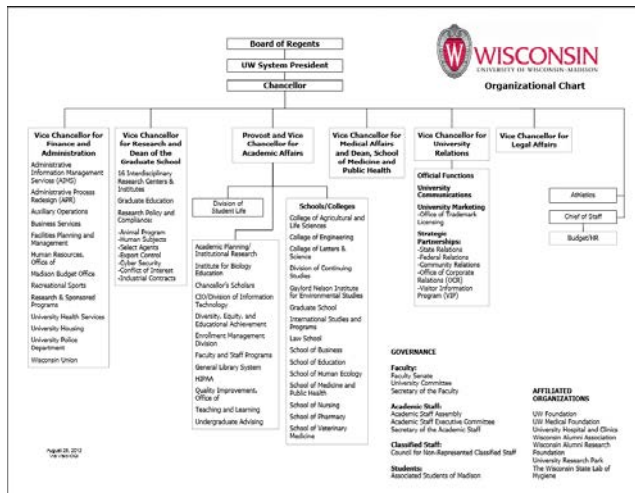
Infonomics / Nov Dec 2008 pg. 52

Transparency

Retention

"Record retention schedules are a set of policies and procedures that identify and describe an organizations records and how they are handled" ECAR Research Bulletin 8, 2010.

- Statutorily required by **Wisconsin Statute §** 16.61(4)(b)

- Apply to all formats and media (paper and electronic)

- Record Schedules contain:
  - record policy
  - record series
  - retention time-frame/event
  - Disposition

Records Mgt File Plan

| Document Types |
| Record Organization |
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| Office Rec Mgt Process |
| Records Retention |
| Records Disposition |

University Records Management... > University Records Retention Schedule...

University Records Retention Schedules and Disposition

Overview: What is a University Records Retention Schedule?

State agencies like UW-Madison, are **statutorily required to provide records schedules for all records not already covered by an existing records schedule.** By law, Record Retention Schedules have to be submitted one year after each records series has been received or created. After 10 years, the RDA sunsets, and a new one must be resubmitted for Public Records Board approval. These records retention schedules apply to records in all formats, not just paper records. This would include records in electronic systems, such as email, records in shared drives, imaging systems, and other electronic repositories.

In Wisconsin State government, the records scheduling process is accomplished by completing an RDA or records schedule which the University Records Officer submits to the Public Records Board (PRB) for approval after getting a legal review and archival review. There are three types of records schedules for the University: general campus-wide, general system-wide, and department/unit specific.

Record Schedules consist of the records policy, record series (which is a group of record types that work and function together and are kept for the same amount of time), a retention time-frame/event, and disposition.

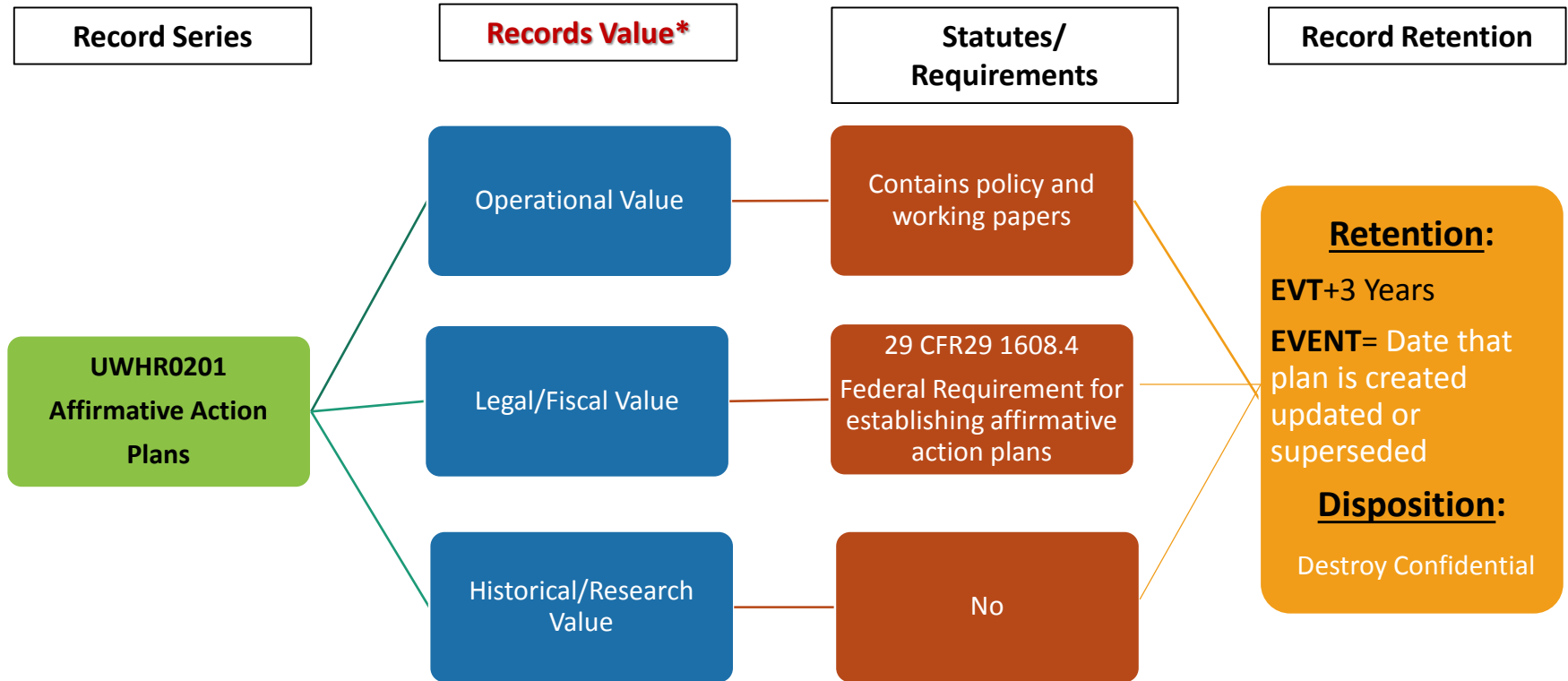*By Wisconsin law university records cannot be disposed of without a valid records schedule.*

University Records Retention Schedules and Disposition

> University General Records Schedules – Campus-wide and System-wide

> University Records Disposition and Disposal of University Records

How Are Retention Periods Determined?

*Records Value is determined by the records content and use

Record Series	Records Value*	Statutes/ Requirements	Record Retention

UWHR0201 Affirmative Action Plans

- Operational Value → Contains policy and working papers
- Legal/Fiscal Value → 29 CFR29 1608.4 Federal Requirement for establishing affirmative action plans
- Historical/Research Value → No

Retention:

EVT+3 Years

EVENT= Date that plan is created updated or superseded

Disposition:

Destroy Confidential

Retention is applied to electronic record including e-mail.

What is meant by a "Record Series"?

Are document types that are kept together as a unit:

- because they relate to a particular subject,
- result from the same activity, or
- have a particular form and the same retention.

Record Series are also known as Records Disposition Authorizations or RDA's.

Wisconsin Statute §16.61(2)(c) "Records series" means public records that are arranged under a manual or automated filing system, or are kept together as a unit, because they relate to a particular subject, result from the same activity, or have a particular form.

1. RDA # /Status	2. Series Title / Description	3. Record Series Year of Creation	4. Medium for Record Storage	5. PII	6. Registry Exempt	7. Confidential	8. Essential (opt.)	9. Official Record Location (opt.)	10. Retention / Disposition / Event
UWHR0201 Superseding HR000135	**Affirmative Action Records -EEOC (Equal Employment Opportunity Commission) - Plans** This series documents Affirmative Action plans for UW-System Campuses in compliance with Wis. Stat. § 230.04(9) and 29 CFR§ 1602.32 and 29 CFR29§ 1608.4. Each institution within the UW-System has an Affirmative Action related plan which contains policy related items and working papers.	-	Paper and Electronic format	No	-	No	-	Office of Compliance or similar campus department	**Retention:** EVT+3 Years EVENT = Date that Plan is Created, Updated, or Superseded **Disposition:** Destroy

Record Schedule Updates

Record Schedules or RDA *(Records Disposition Authorizations)* "sunset", or expire every 10 years – schedules need to be renewed, closed or superseded. **Wisconsin Statute §16.61(4)(c)**

Process for renewing Record Schedules/RDA's is the same as for creating new record series.

The University Records Officer will contact Departments with record schedules which have "sunset" to create, update, renew or close their schedules.

Disposition

Wisconsin Statute §16.61(4), State agencies may not dispose of a public record unless they have a current record retention schedule, approved by the Public Records Board (PRB), that covers that particular record series.

Disposition is what happens to the records after it has met Retention.

There is an **Event** which triggers the disposition.

Records Mgt File Plan
Document Types
Record Organization
Compliance
Record Custodian
Security Classification
Access Permissions
Record Storage
Office Rec Mgt Process
Records Retention
Records Disposition

1. RDA # /Status	2. Series Title / Description	3. Record Series Year of Creation	4. Medium for Record Storage	5. PII	6. Registry Exempt	7. Confidential	8. Essential (opt.)		
UWHR0107 Superseding HR000061	**Compensation, Titling and Salary Equity Records** This series consists of, but is not limited to market compensation data/analysis, position and job family analysis, titling structure, labor market surveys and reports, including those for a specific job.	-	Paper and Electronic format	No	-	No	-	Human Resources ...ation ...g or similar university department	**Retention:** EVT+6 Years EVENT = Date that Analysis or Survey was Completed **Disposition:** Destroy

This is the time frame to keep records once the Event has been trigger.

This is the Event trigger

This is what to do with the records when retention has been met.

*There should be a University commitment to the records scheduling process…..
Retaining everything is <u>not</u> good records management practice.*

- Keeping everything is costly and expensive.
- Costs in Time and Money for searching and retrieval of all types of records.
- The More Information = A Increased Risk in Lost Files or Misfiles and Information Breeches.
- The more information the slower the electronic recordkeeping systems run.

There should be good, well-considered reasons why your office would retain records past their final disposition date.

Record destruction should be completed in a consistent manner in <u>Normal Course of Business.</u>

The Exception: Record Schedules are suspended and held for Litigation & Discovery and Audit until completed.

What is an Employee to Do?

Taken by P.Eusch2013

Be Proactive

- ❑ Electronic Documents (Unstructured Records)
- ❑ Shared Network Drives
- ❑ Email
- ❑ Collaborative – UW Mad Box, Google Docs etc.
- ❑ Databases (Structured Records)
- ❑ Paper

Should only need to keep the Final agreement. Others are Redundant.

Photo collage follows poor file naming procedures

The wedding video is personal content that should not be on the shared drive

Name	Authors	Date modified	Date accessed	Date last saved
damage.jpg		11/2/2015 1:13 PM	12/23/2015 8:02 AM	11/2/2015 1:13 PM
HVAC agreement Final 10-28-2015.pdf		4/11/2016 11:09 AM	4/11/2016 11:09 AM	4/11/2016 11:09 AM
HVAC agreement Final 11-01-2015.d...	James Just	4/11/2016 11:08 AM	4/11/2016 11:08 AM	4/11/2016 11:08 AM
HVAC agreement v2 jj.docx	James Just	9/10/2015 9:41 AM	12/23/2015 8:57 AM	8/21/2015 12:40 PM
HVAC agreement.docx	Barbara Williams	11/2/2015 1:13 PM	12/23/2015 8:57 AM	11/2/2015 1:13 PM
Industrial supplies agreement.docx		11/17/2015 10:10 ...	12/23/2015 8:57 AM	11/2/2015 1:13 PM
letter.docx	Barbara Williams	11/2/2015 1:13 PM	12/23/2015 8:57 AM	11/2/2015 1:13 PM
photo collage.pdf		10/11/2014 9:46 PM	12/23/2015 8:02 AM	10/11/2014 9:46 PM
Price discrepency Fred.docx	Barbara Williams	11/2/2015 1:13 PM	12/23/2015 8:57 AM	11/2/2015 1:13 PM
Price discrepency Tom.docx	James Just	10/22/2014 2:39 PM	12/23/2015 8:57 AM	10/22/2014 2:39 PM
wedding video.mp4		10/11/2014 9:46 PM	12/23/2015 8:02 AM	10/11/2014 9:46 PM

All University Employees are Records Managers…..

- Employees have the responsibility to manage the records they create through the entire records lifecycle.

- Employees should have an understanding that university records can be public records and are stored in many different formats and media.

- Employees have the responsibility to manage university records in accordance to State, Federal and University policy.

"Your Work Responsibilities and University Records" on the UW-Madison Records Management website under **Program Overview**. This doc. is handed out in NEO.

University Record Management Program

New for University Records Management
See what's new this year.

Offsite Storage; the State Records Center and Access
Information regarding the use of the State Records Center.

Program Overview
This section contains information on the UW-Madison Records Management Program and services. Areas include Records Management Policy, Legal Requirements and the Generally Accepted Recordkeeping Principles.

Record Management Training Resources for University Offices
Records management training materials and guidance on major topics of interest relating to the managing of University records.

University Record Retention Schedules and Disposition
This section contains the University Record Retention schedules for use campus wide and guidance on disposal of university records.

University Records Management Advisory Group (URMAG)
The URMAG is a broadly representative body tasked by the Provost's Office to provide direction and support for the University Records Management program.

Where to find the Retention Schedules and Departing Employee Guidance in the Human Resource Policy's

Management of Inactive Paper Records

OFF-SITE
State Records Center

ON-SITE
Department or Unit

Destruction Log for Departments/Units for On-site Records

A **Department Destruction Log** is highly *Recommended* as a best practice to be in compliance with destruction of records.

Demonstrates that records where destroyed with in the normal course of business.

Example form:

UW-Madison On-site Records Destruction Log

DEPARTMENT OR UNIT:	ABC Department		UDDS: 000001		
DATE:02-16-2017			Signature: *Peg Eusch*		
Records Schedule Number destroyed against	Record Types Destroyed		Number of Boxes or TB	Date of Destruction	Company that did the Destruction ie (State Records Center, Pelliteri, Shred-IT)
UWHR0800	Student Evaluations		4 Boxes	2/16/2017	State Records Center
		Example			

University E-mail Record Decision Tree
*SEE UWS GRS Business Communication Schedule

Content Determines the Value

CONTENT of Received or Created e-mail

Is the e-mail **Non-Records** duplicate copy, or spam? Cc, Bcc emails recieved

→ Yes → Wisconsin State Statue 16.61(2)(b) says it is *not* a record. **Delete it!**

↓ No

Is the e-mail **Transitory**?

→ Yes → **Retention Schedule*:** Keep 7 days or until superseded or event has expired. *Delete it!*

Transitory = Business-related messages of minimal short term value.

It can replace in-person conversation.
EX: Information about workplace events, Listserv, quick response to a request. (e.g., "What hours are you open?").

↓ No

Is the e-mail **Routine**?

→ Yes → **Retention Schedule*:** Keep 6 months after event, project or activity. *Delete it!*

Routine = Directly connected to the transaction of public business

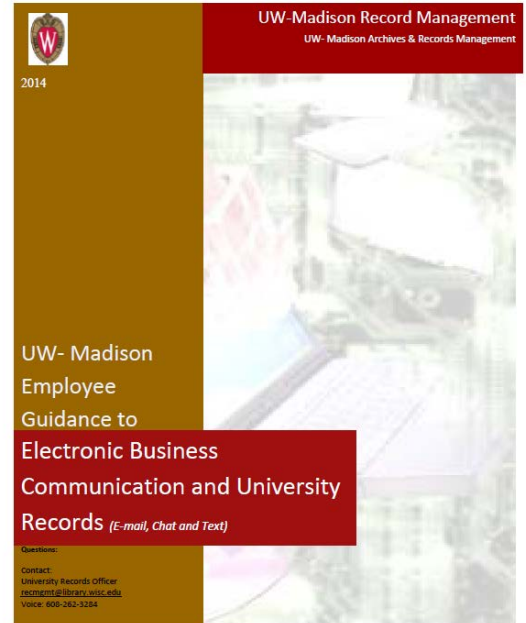Normal communication between team member working on a project.

↓ No

It is a University Record.

See the appropriate university records retention schedule for appropriate retention and disposition on Website.

Governed by the appropriate records schedule according to what the content of the email is. Refer to the University General Retention Schedules on the UW-Madison Records Management Website.

Contact Records Officer

E-mail message consists of: 1. Metadata, 2. Message body 3. Attachments **based on content**.

UW-Madison Record Management
UW- Madison Archives & Records Management

2014

UW- Madison Employee Guidance to Electronic Business Communication and University Records *(E-mail, Chat and Text)*

Questions:

Contact:
University Records Officer
recmgmt@library.wisc.edu
Voice: 608-262-3284

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Responsibility for Departing Employees

Responsibility of Employee, Supervisor and Managers to ensure that records are transferred before the employee leaves.

Reason:

- Ability to answer and respond Public Records Request or Litigation and Audit

- Records have not met our Retention Obligation

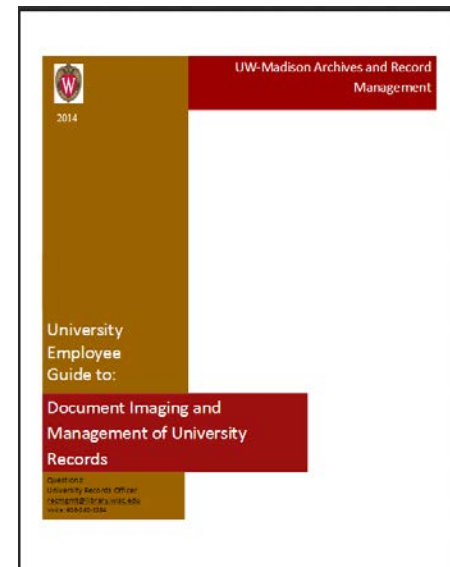- Good Records Management practices – Authenticity and Integrity.

Work with your Information Technology Staff

- to get email into a service account,
- documents into shared network drive if available and
- access removed where needed

Guidelines for Digital Imaging University Records

- *Scanning is not a substitute for development of good records management practices. The problems caused by poor record and filing systems will not be improved in a digital format and will get worse without a plan.*

- *Scanning should be implemented as part of a larger information management strategy which should be addressed by the campus or departments /unit.*

- o UWSA Technical Requirements
- o Wis. Adm. Rule 12 for Electronic Records
- o An approved Record Schedule required for scanning

UW-Madison Archives and Record Management

University Employee Guide to:

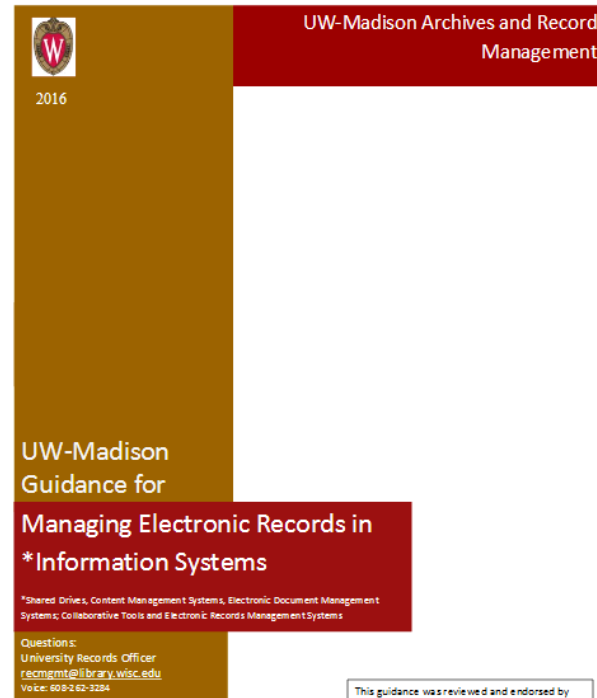Document Imaging and Management of University Records

Guidelines for Electronic Records Management

- First know the rules.

- Find the Records Schedules and understand the business process for your department or unit. What types of record does the dept. create and manage in the drive?

- Pull together a team of subject matter experts in your area to begin to review and assess the drive.

- In a separate file create the file structure that will be used.

- Clean out the ROT (Redundant, Obsolete, and Trivial Files)

ROT files are the Temp files; or system generated files; Personal content; Orphaned content; Duplicates; and other Documents types.

This analysis would probably fall to your IT team member.

UW-Madison Archives and Record Management

2016

UW-Madison Guidance for

Managing Electronic Records in *Information Systems

*Shared Drives, Content Management Systems, Electronic Document Management Systems; Collaborative Tools and Electronic Records Management Systems

Questions:
University Records Officer
recmgmt@library.wisc.edu
Voice: 608-262-3284

This guidance was reviewed and endorsed by the URMAG on September 2, 2016

Records Management Training Resources

There are guidelines for email and imaging of records; organization of shared drives along with other topics of interests.

- [Organization of University Records](#)
- [University Employee Responsibility for Records](#)
- [University Electronic Mail](#)
- [Document Imaging and Scanning of University Records](#)
- [Records and Department or Unit Move or Closing](#)
- [University Research Records](#)
- [Electronic Storage and Backup](#)
- [Dispositions of University Records](#)

University Record Managemen... > Record Management Training Resourc...

Remember…
Good Recordkeeping Practices……

- *Inventory and develop a file plan for your records*

- *Identify records and apply the appropriate retention schedule*

- *Create and maintain accurate files (paper & electronic)*

- *Manage or eliminate duplicate records*

- *Commit to the records scheduling and disposition process for records in all formats once or twice a year consistently.*

Now your you are on the road to success ....

Thank you !

Come Visit us on the UW-Madison Records Management Website
http://www.library.wisc.edu/archives/records-management/

UW-Madison Records Management on Facebook:
https://www.facebook.com/UWMadisonRecordsManagement

Or Join the UW-Madison Records Management List for updates:
join-uw_rec_mgt_list@lists.wisc.edu

Email the University Records Officer for more information:
recmgmt@library.wisc.edu