Management of University Records in the Cloud

UW-Madison Records Management Program
Explore the unique characteristics of records and recordkeeping challenges associated with adoption of social media technologies
Records are a Key University Information Asset:

- Records facilitate and sustaining day-to-day university operations
- Records support predictive activities such as budgeting and planning
- Records assist in answering questions about past decisions and activities
- Records demonstrate and document compliance with applicable laws, regulations, and standards
Definition of a Record

**Wisconsin State Statutes 16.61** defines a Public Record as all books, papers, maps, photographs, films, recordings, or other documentary materials, regardless of their physical form or characteristics, produced or received by any state agency or its officers or employees in connection with the transaction of public business, regardless of physical form or characteristics, made, or received by any state agency or its officers or employees in connection with the transaction of public business.

**ISO 15489-1 Information and Documentation– Records Management –Part I: General** gives the following definition for a record: “Information created, received, and maintained as evidence and information by an organization or person, in pursuance of legal obligations or in the transaction of business.”

UW Archives and Records Management
It is the **Content and Function** that determines a record – regardless of the format.

**Non-Records:**

- FYI: or information requiring no action
- Social, meeting or announcement type of notices, ie. potluck, cookies in the break room, “where the meeting”
- Personal messages and “chit-chat”
- Spam, junk mail and list serve messages
- Delete ASAP.
Information....

Information is made up of complex components and no single center of control.

Information is not static and in constant flux.

How can this information be captured managed and stored?
Websites and Social Media such as Facebook and Twitter, Flickr, Tumblr are transient but may contain records.
Social Media as Public Records

Information posted by agencies to social networking sites may be considered a public record.

Public Records must be retained according to the relevant General Retention Schedules in situations where any of the following apply:

- the information is unique and not available elsewhere
- contains evidence of the University’s policies and procedures
- is being used to conduct the University’s work
- has been authorized by the University, or contains information for which there is a business need
University Principles for Recordkeeping:
The 8 Generally Accepted Recordkeeping Principles
“The Principles”

1. Accountability
2. Transparency
3. Integrity
4. Protection
5. Compliance
6. Availability
7. Retention
8. Disposition

“The Principles” were Endorsed by the Campus Records Review Group (CRRG) as a University Campus Best Practice for recordkeeping in Nov 2010

ARMA International Introduced 2009.
How are “The Principles” applied to university electronic records and university records out in the cloud?
1. Principle of Accountability

Accountability though the implementation of University policy’s surrounding the organization and maintenance of records that are administered and validated in the cloud.

Examples:
- Documents stored in cloud storage such as Box.net
- Use of Wiki, or Blogs
- Facebook, Twitter
- Etc.
2. Principle of Transparency

- Transparency is related to Accountability.
- Ideally departments should document information processes and workflows and include how and where information is stored.
3. Principle of Integrity

Characteristics of a Record

- **Integrity** - The record is complete, unaltered, and protected from unauthorized use.

- **Authenticity** - Evidence that the record is what it purports to be.

- **Reliability** - Confidence that the record’s content is an accurate representation of the actions, activities and transactions that occurred.

- **Usability** - The record can be located, retrieved, presented and interpreted.
Regardless of the collection method employed, strict chain of custody records must be maintained for all documents, data, and objects collected so that their authenticity can be assured.

A sort of paper tail of sorts....who handled the records and when, and where are the records/data stored?
4. Principle of Protection
Is University Data protected in the cloud?

- Awareness that the 3rd party has an *Individual* relationship with the you the user, not a *business relationship*.

- Is there a 3rd Party Disclaimer for responsibility for keeping the user’s data secure or intact.

- Who owns your university data and Who has access to change your data?

- Awareness of how social media works...
  Example with Facebook: What are the defaults setting and do staff know how to use them?

- Are there University contract requirements of the Third Party for storage and access of data. If not... Think about the content of the information before uploading.

- Privacy of Personally Identifiable Information (PII) or Protected Health Information (PHI)...Steps required for authentication and authorized access to information and data under FERPA, HIPAA or FISMA in the cloud
5. Principle of Compliance

Are University Records in Compliance?

Management of records to comply with:

- University Records Management and Best Practices
- Records Retention and Disposition Policies
- Other relevant University policies e.g. CIO IT Policies
- Outside accreditation requirements
- Discovery and open records or FOIA
- State and Federal requirements
6. Principle of Availability
Availability of Records and Data Questions.

- Are records being maintained in a way that maintains their functionality and integrity throughout the record’s full life cycle?

- How are the links maintained between the records and their metadata?

- What level of backup is provided for data?

- What is the third party’s business continuity and disaster recovery plan for it’s operation and your data?
E-Records should be Available, Organized and Accessible with...

- A good File Structure with Establish a Classification Scheme w/ Uniform Naming Conventions for unstructured content.

- The ability to apply University’s Records Retention policies

- Establishing and documenting a migration plan for records that need to be preserved or have not met retention.

**Examples:**
- Email
- SharePoint
- Network Shared Drives
- Google Drive
- Box.net
- Cloud Storage

**Unstructured Content:** emails, graphics, audio, video, word, excel
Long-Term Preservation of Electronic Records

Wisconsin Administrative Rule 12

- The purpose of this chapter is to ensure that public records in electronic format are preserved and maintained and remain accessible for their designated retention period.

- It establishes defined requirements, standards and guidelines for state and local government accessibility of electronic public records from creation through active use, long–term management, preservation and disposition.
How do we insure that our retention obligations are met for records generated in and stored in the cloud?
Retention is based on Record Values

- **Legal Value:**
  *How long can the laws or the courts lay claim to the records?* Is there a stated legal retention for records? Statute of Limitations is not retention, it’s the time that one has to file suit.

- **Fiscal Value:**
  Value of a record that serves as an evidence of a financial transaction for audit.

- **Administrative/Operational Value:**
  *How long does the record contribute to the organizations function?* The usefulness of records to originating offices for conducting day-to-day business.

- **Archival/Historical Value:** *What records have persistent or historical value and, hence, must be kept for posterity?* The usefulness of records for historical research concerning an organization's functions and development, or for information about persons, places, or events.

- **Research Value:**
  The usefulness of records for university research
E-discovery and the Cloud ... Question to consider

- Possession, chain of custody,
- Control of data
- Duties of provider to the user
- Authentication of data
- International laws
- Ease of search capabilities across cloud environment
8. Principle of Disposition

An organization shall provide secure and appropriate disposition for records that are no longer required to be maintained by applicable laws and the organization’s policies.

How is disposition completed in the cloud or can it be?
What’s the Employee’s Responsibility for University Records/Data?

- Use university applications where ever possible.

- Be aware that there may be University Records both in the cloud and stored on personal media devices used for university business.

- Keep in mind that what you posted on behalf of the University on social networking sites reflects back on the University.

- University Records you create, in *any format or media*, while a University employee *may* be available under the Public Records Law. It’s a good policy to keep personal separate from work.
Challenges for the Management of University Records in the Cloud.....

- Content is located in multiple places
- Challenges of Recordkeeping is collaborative environment
- Interactive content management
- Ownership and control of data that resides with 3rd party
- Implementation of records disposition schedules, including the ability to transfer and permanently delete records or perform other records management functions
- Capture of frequently updated records
- Handling of record containing PHI and PII (storage, accessing, privacy concerns)
- Public expectation that all web content is both permanently valuable and accessible
University Guidance and Policies.....

- UW-Madison University Communications: Guidelines for Home Pages
  http://www.wisc.edu/about-this-site.php

- UW-Madison University Communications: Social and New Media Guidelines

- UW-Madison Records Management Program
  http://archives.library.wisc.edu/records/Index.html

- UW-Madison Office of the CIO - IT Policies
  http://www.cio.wisc.edu/policies/

- Office of Administrative Legal Services
  http://legal.wisc.edu/reference/public-records.html

- UW-System General Counsel Records Management
  http://www.uwsa.edu/gc-off/records/
Records Management

“The field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records, including the processes for capturing and maintaining evidence of and information about business activities and transactions in the form of records” Citation: ISO 15489: 2001 (International Standard for Records Management)

REMEMBER..Records and information are the University’s most important assets.
While ordinary and mundane to most, records are a vital necessity...
- People come and go
- Records provide the continuity for the continued operation of university business
Thank you

For more information contact:

Peg Eusch, CRM
Certified Records Manager
UW-Madison Records Officer

meusch@library.wisc.edu

UW-Madison Records Management Program Helping in ways you never imagined.......