Records; Files Plans; and Retention
Creating a Roadmap to Success

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University Records Officer

Today we will cover...

• What is a record?
• What is not a record?
• What is 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. Statute 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 activities and actions?**
- **Is the record mandated by statute or regulation?**
- **Does the record support financial obligations or legal claims?**
- **Does the record communicate organizational requirements?**

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

### Non-Records

**Wis. Stat. 16.61**

**Duplicates**

Duplicates records 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.
What Records are being Created?
When can I Dispose of the Records?
How are Records being Managed?
Where are Records being Stored?

Just some facts.......

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**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 Five 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.

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.

Challenges & Risks for Management of Records

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

- Not In Compliance with State Laws for Retention of Records

Information Silos

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

Departments

R & D, Marketing, IT Services, Training
8 Generally Accepted Recordkeeping Principles®

- Accountability
- Transparency
- Integrity
- Protection
- Compliance
- Availability
- Retention
- Disposition

“The Principles” were endorsed by University Records Management Advisory Group (URMAG) in 2010 as a University Best Practice in the management of information.

ARMA International publishes the Generally Accepted Recordkeeping Principles®. More information about the Principles can be found at www.arma.org/principles.


A “file plan” is a well thought out plan in how records are managed.

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

It is one of the essential components a Dept./Unit can utilize in management of university records.

Think of this 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

Information or Records Type

- Identified through a records inventory.
- Identified through business process and workflow and records created.
- Dependent on the needs of the business.

Examples:
- Meeting Minutes
- A/P Invoices
- Purchase Cards
- Student Admission record
- Contracts
- Grants
Taxonomy and Classification

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.

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.
Compliance

Custodian

- The Records Custodian is the person responsible for 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

- 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.

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

Access Permissions

Permissions applied to the repository (e.g.: file share, applications such as the Student Information System) will list what permissions as they actually are, not what they should be. How is access assigned and is there associated training for the Protection of records?

Processes and controls should prevent a single person from executing transactions that conflict with best business practices.

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.

<table>
<thead>
<tr>
<th>Role</th>
<th>Create</th>
<th>Read</th>
<th>Update</th>
<th>Delete</th>
</tr>
</thead>
<tbody>
<tr>
<td>University Records Mgt. Advisory</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>All Employees (access limited)</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corporate Communications Manager</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Public (access limited)</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

- 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.

**Availability, Integrity and Authenticity**

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**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?

**Transparency**
Retention

“Record retention schedules are a set of policies and procedures that identify and describe an organization’s 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

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.

Example Records Series from UWSA Human Resources GRS

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>UNMHR0030-1</td>
<td>Affirmative Action Records: UWS System Compliance Office</td>
<td>-</td>
<td>Paper and Electronic Format</td>
<td>100</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Office of Compliance</td>
<td>Record is created, stored, and updated.</td>
</tr>
</tbody>
</table>
How Are Retention Periods Determined?

*Records Value* is determined by the records content and use

<table>
<thead>
<tr>
<th>Record Series</th>
<th>Records Value</th>
<th>Statutes/Requirements</th>
<th>Record Retention</th>
</tr>
</thead>
<tbody>
<tr>
<td>UWHR0201 Affirmative Action Plans</td>
<td>Operational Value</td>
<td>Contains policy and working papers</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Legal/Fiscal Value</td>
<td>29 CFR29 1608.4 Federal Requirement for establishing affirmative action plans</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Historical/Research Value</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

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.

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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.

<table>
<thead>
<tr>
<th>Information/Record Type</th>
<th>Record Series ID</th>
<th>Disposition Trigger</th>
<th>Retention Period</th>
<th>Purge Date</th>
<th>Repository</th>
<th>Delete or Transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meeting Minutes</td>
<td>UWADM018</td>
<td>Approval of Minutes</td>
<td>3 Years</td>
<td></td>
<td>Transfer to UW-Madison Archives</td>
<td></td>
</tr>
<tr>
<td>Expenditures: Acct Payable Records</td>
<td>UWFA300</td>
<td>Fiscal Year</td>
<td>6 Years</td>
<td></td>
<td>*Database, *Paper -office cabinet and *Excel-Shared Network drive</td>
<td>Destroy Confidential</td>
</tr>
</tbody>
</table>

There should be a University commitment to the records scheduling process..... Retaining everything is not 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 Normal Course of Business.

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

https://commons.m.wikimedia.org/wiki/File:Article-37.jpg
What is an Employee to Do?

Be Proactive
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.

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
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:**

<table>
<thead>
<tr>
<th>UW-Madison On-site Records Destruction Log</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>DEPARTMENT OR UNIT:</strong> ABC Department</td>
</tr>
<tr>
<td><strong>DATE:</strong> 02-16-2017 <strong>UDSS:</strong> 000001</td>
</tr>
<tr>
<td><strong>Number destroyed:</strong> 4000</td>
</tr>
<tr>
<td><strong>Record Types Destroyed:</strong> Student Evaluations</td>
</tr>
<tr>
<td><strong>Number of Boxes or Tubs:</strong> 4</td>
</tr>
<tr>
<td><strong>Date of Destruction:</strong> 2/16/2017</td>
</tr>
<tr>
<td><strong>Company that did the Destruction in [State Records Center, Pellissippi, Shangri-La]?:</strong> State Records Center</td>
</tr>
</tbody>
</table>

**Example**
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
Be Proactive and Not Reactive

- Choose to manage records and improve recordkeeping practices.
- Create a team to review your record management responsibilities for records – get organized.
- Review each element of the file plan.
- Document record management processes and practices and link back to the Records Management site.
- Know what Record Schedules to apply and where to find them. [https://www.library.wisc.edu/archives/records-management/retention-disposition/](https://www.library.wisc.edu/archives/records-management/retention-disposition/)
- Consult with the University Records Officer for assistance.

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


UW-Madison Records Management on Facebook: [https://www.facebook.com/UWMadisonRecordsManagement](https://www.facebook.com/UWMadisonRecordsManagement)

Or Join the UW-Madison Records Management List for updates: [join-uw_rec_mgt_list@lists.wisc.edu](mailto:join-uw_rec_mgt_list@lists.wisc.edu)

Email the University Records Officer for more information: [recmgmt@library.wisc.edu](mailto:recmgmt@library.wisc.edu)