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

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2017 UW-Madison Records Management Program
University of Wisconsin-Madison Archives & Records Management
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?

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.
What Records are being Created?

How are Records being Managed?

Where are Records being Stored?

When can I Dispose of the Records?
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.

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
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

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

**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

**What**  
(Documents)

**Who**  
(Custodian, Security and Access)

**When**  
(Retention, 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:
- Meeting Minutes
- A/P Invoices
- Purchase Cards
- Personnel Record
- Contracts
- Recruitment Records
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.
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.

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

Principle of Compliance
Custodian

• 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
Where are Records Kept?

- 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?

Transparency
RetentionPolicy

“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

*By Wisconsin law university records cannot be disposed of without a valid records schedule.*
How Are Retention Periods Determined?

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

**Record Series**
- UWHR0201
  - Affirmative Action Plans

**Records Value**
- Operational Value
- Legal/Fiscal Value
- Historical/Research Value

**Statutes/Requirements**
- Contains policy and working papers
- 29 CFR 29 1608.4
  - Federal Requirement for establishing affirmative action plans
- No

**Record Retention**
- 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.

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<tr>
<td>UWHR0201 Superseding HR000135</td>
<td><strong>Affirmative Action Records - EEOC (Equal Employment Opportunity Commission) - Plans</strong> 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 CFR § 1608.4. Each institution within the UW-System has an Affirmative Action related plan which contains policy related items and working papers.</td>
<td></td>
<td>Paper and Electronic format</td>
<td>No</td>
<td>No</td>
<td>-</td>
<td>Office of Compliance or similar campus department</td>
<td></td>
<td>Retention: EVT+3 Years EVENT = Date that Plan is Created, Updated, or Superseded Disposition: Destroy</td>
</tr>
</tbody>
</table>
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.
Disposion

**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.

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<tr>
<td>UWHR0107</td>
<td>Compensation, Titling and Salary Equity Records</td>
<td>-</td>
<td>Paper and Electronic format</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Human</td>
<td>No</td>
<td>EVT+6 Years</td>
</tr>
<tr>
<td>Superseding HR000061</td>
<td>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.</td>
<td>-</td>
<td>No</td>
<td>EVT+6 Years</td>
<td>EVENT = Date that Analysis or Survey was Completed</td>
<td>Destroy</td>
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This is the Event trigger

This is the time frame to keep records once the Event has been 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 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.
What is an Employee to Do?
Be Proactive

- Electronic Documents (Unstructured Records)
- Shared Network Drives
- Email
- Collaborative – UW Mad Box, Google Docs etc.
- Databases (Structured Records)
- Paper
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.
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 were destroyed within the normal course of business.

Example form:

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**UW-Madison On-site Records Destruction Log**

<table>
<thead>
<tr>
<th>DEPARTMENT OR UNIT:</th>
<th>ABC Department</th>
<th>UDDS: 000001</th>
</tr>
</thead>
<tbody>
<tr>
<td>DATE: 02-16-2017</td>
<td>Signature: Peg Bauer</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Records Schedule Number destroyed against</th>
<th>Record Types Destroyed</th>
<th>Number of Boxes or TB</th>
<th>Date of Destruction</th>
<th>Company that did the Destruction (e.g., State Records Center, Pellitteri, Shred-IT)</th>
</tr>
</thead>
<tbody>
<tr>
<td>UWHR0800</td>
<td>Student Evaluations</td>
<td>4 Boxes</td>
<td>2/16/2017</td>
<td>State Records Center</td>
</tr>
</tbody>
</table>

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*Example*
University E-mail Record Decision Tree

*See UWS SIPS Business Communication Schedule

CONTENT of Received or Created e-mail

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

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!

No

Is the e-mail Routine?

Yes

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

No

It is a University Record.

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

Contact Records Officer

Content Determines the Value

Transitory = Business-related messages of minimal short term value.
It can replace in-person conversation.
EX: Information about workplace events, listserve, quick response to a request (e.g., “What hours are you open?”).

Routine = Directly connected to the transaction of public business
Normal communication between team member working on a project.

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.

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

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