Records Management Business Case

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Records Management Task Force

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Executive Summary

As the University of Michigan approaches its third century, it is a perfect time to reflect on how the university manages its records and information assets. Our achievements, successes and innovations as a world-renowned institution of higher education, research and health care can only be remembered and claimed over time if evidence of them is properly preserved. The increasing demands placed on the university to streamline its administration and comply with legal requirements can be more readily met if we manage our records efficiently: preserving records we need to preserve and disposing of records that have outlived their usefulness. In addition, the pace of technological change exposes us constantly to new challenges and risks in the creation, storage, security and destruction of records. While knowledge generation and innovation are our business, on average we manage our information assets with less rigor and support than our physical or financial assets.

This Records Management Task Force (the task force) was formed to consider these challenges. The task force was charged to identify and recommend institutional policies, standards, guidelines, tools and other strategies.

Our investigation has uncovered much positive effort and goodwill around improving campus records management. University archives and other areas of specialized records management currently provide for some notable successes, but collectively, U-M efforts are uncoordinated, duplicative, and inadequately supported. Even in our preliminary survey, we identified areas where better management of records could save money and improve productivity. We found significant gaps in governance, policy, staffing, technology and incentives. In short, there is a critical need to put in place a more effective and coordinated approach to managing institutional records.

The primary recommendations of the task force are:

1. To create and fund a new position, the University Records Manager, to spearhead the work recommended in this proposal. This initiative would operate in an analogous way to the Space Planning and Utilization project;
2. To implement a new records management policy framework, adopt a revised SPG 601.8, and develop a new U-M-specific records retention schedule;
3. To adopt a new governance structure that will improve accountability and coordination of records management at U-M.

Despite the challenging climate and resource limitations facing the university, we cannot afford to wait before improving our records management practices. If implemented, the proposed program will meet our legal, administrative, and historical needs and save the university money. The time is right, and critically the task force believes the campus culture is ready, to tackle this now.
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Task force goals

This task force was sponsored by four leaders with an interest in the efficient and responsible management of university records: Francis X. Blouin, director of the Bentley Historical Library and professor of information and history; Laura Patterson, chief information officer; Suellyn Scarnecchia, vice president and general counsel; and Carol Senneff, executive director of University Audits.

Their charge to the task force (Appendix A), which was endorsed by the university’s executive officers on July 19, 2011, noted that a successful records management policy and program will:

1. Ensure compliance with laws, promote efficiency, and manage institutional risk by specifying standards for the consistent management of records across the university;
2. Preserve U-M historical records and legacy;
3. Complement current university-wide administrative streamlining initiatives;
4. Require a clear mandate and the active support of campus leadership; and
5. Effectively communicate standards of practice with appropriate monitoring for compliance.

This proposal reflects our recommendations based on extensive benchmarking, serious consideration of a variety of options, and a deep sense of reality about the current climate and budgetary challenges facing the university. More information about our methodology and key findings is available at the end of this report.
Gap analysis

The task force identified significant gaps in each of the following areas:

A. Authority and governance gaps

- No executive officer or senior manager is specifically accountable for records. Other than archival records, there is no institutional governance structure relating to the management of records.

- There is a general lack of coordination around the management of records across U-M. The University Archives and Records Program (part of Bentley Historical Library) focuses on records of enduring value, while records with shorter lives are retained locally or by specific units that maintain central files (e.g., University Human Resources or the Registrar’s Office) or, in many instances, by both.

- The university's campuses at U-M Flint and U-M Dearborn have underdeveloped archival operations for their records and are now encountering even greater challenges in matching pace with emerging best archival practices for digital records and technologies. As a result, the unique history and achievements of both campuses are at risk of being lost over time.

- Across the Ann Arbor campus and Health System, there is wide variance in the level of effort around records management. Some units are expending duplicative efforts developing their own policies and practices, while other units are making no active efforts.

B. Policy gaps

- More than 15 uncoordinated Standard Practice Guide (SPG) policies provide outdated, incomplete and inconsistent advice about what records are and how to manage them. We lack a process for creating record-keeping standards and guidelines that can more nimbly respond to changes in compliance requirements, business processes, and technology.

- We lack an overarching policy that states clearly that U-M owns its administrative records, and that properly addresses issues of custody, control and access to those records. This has exposed the university to serious risk and potentially significant costs in cases where deans and other executives have left leadership roles without granting others access to important evidence of their commitments, decisions and official actions. Our interviews across campus demonstrated that university leaders crave training and guidance about which of their records are historically significant, and how to balance the benefits of preserving U-M’s history against the realities of protecting sensitive information.
For many types of records, current SPGs offer no guidance about which office is responsible for maintaining the official copy, or for how long it must be kept. Existing retention guidance is scattered throughout numerous SPGs and is often too vague or out-of-date to be useful. Unlike many of its peer institutions, U-M has never promulgated an institution-wide records retention schedule. Specific advice ought to be consolidated in one, easy-to-use reference source.

The scope and understanding of what constitutes a “record” as opposed to data or information are constantly evolving. Employees are no longer certain how to recognize a record and what to do with it.

As we move toward self-provisioned services and storage, and workers use their own devices to conduct the university’s business, U-M runs the risk of even greater lost or unknown knowledge and control of where the records of its activities are located. We urgently need new guidelines about where and how to create and store university records, as well as how to destroy unneeded information securely or transfer records of enduring value to the archives.

The decentralized nature of U-M has created a compliance environment that often relies on assumptions and trust, rather than clear delegation of responsibility. Sometimes trust in others’ record-keeping is truly misplaced. Other times, U-M is the victim of good intentions when employees create redundant records because they are unsure whether they are responsible for producing or retaining evidence of a particular decision or transaction. In a lawsuit or audit, often all of the stashes must be searched, leading to significant costs and inefficiencies.

C. Tools and technology gaps

Units have expressed a desire for clearer records management guidance. A lack of tools and standards, including a retention schedule, has resulted in rampant over-retention and duplication of records. Standards would provide a yardstick against which units could self-assess their records practices to improve efficiency and reduce costs.

Uncertainty around ownership and custody in technological systems further exposes our policy gaps related to the status of university administrative records. Similar to the bring-your-own-device trend, there is a dramatic increase in cloud computing by faculty, staff and units. This widespread adoption of cloud-based services, governed by a variety of contractual terms, is driving a loss of control over university content. For example, cloud vendors may affirm that they do not own the content stored using their services, but leave unsettled the question of whether they must turn stored data over to U-M or the employee in the event of a dispute.

Beyond the Bentley Historical Library, we have virtually no metrics about how much information is stored where, which of it constitutes records, and what amount of it is obsolete. For instance, the ITS document imaging team has digitized 23.5 million documents for units across campus, but does not generate metrics of the amount and type of data stored by units. Similarly, CTools
records management business case

We have virtually no metrics about how much information is stored where, which of it constitutes records, and what is obsolete.

The need for a dedicated voice that can advocate for university records does not create metrics of the amount and type of data stored that are related to the administrative work of the university.

- Purging of digital files require much effort, because units maintain records in a variety of legacy systems that cannot implement automated retention schedules. The pace of change in technological systems, and the move from custodial systems to vendor-provided and cloud-based systems, challenges traditional record-keeping practices. Our preliminary investigation determined that the market has not yet provided tools to meet this need. Identifying future solutions will require monitoring of best practice, keeping abreast of technological developments, and constant re-analysis of U-M’s needs to ensure critical records are not lost.

- Vital records should never be stored indefinitely in accounts or on devices to which there is no access beyond that of a single owner.

- Often in the development of new systems, functionality that allows easy migration of data to a future system or automated destruction of information at the end of its useful life is sacrificed in favor of more immediate needs. Better incentives are needed to ensure that record-keeping functionality is built into systems from the start.

D. Staffing and management gaps

- There is no central authority for records management retention and destruction advice. Departments must consult with multiple central offices (e.g. legal, audit, archives, tax) and broker an agreement on the length of time records should be kept. Many offices are too daunted to even begin the process of inquiry, and give up before they have begun. Other offices persevere, but receive conflicting advice, or reach different conclusions based on incomplete information, and expend considerable effort in the process. A central source of reliable information could enable better, faster, and more consistent decision-making.

- There should be a more formal mechanism for coordinating IT and records policy because a significant overlap exists. For example, U-M cannot ensure continuity of operations without rules about how and when the university can access a departing employee’s work files. Also, the security and integrity of digital records requires the thoughtful application of IT security standards within record-keeping systems. Other standards about acceptable storage of sensitive data and allowing employee-owned devices such as iPads and smartphones directly impact how records are managed on campus. Moving forward, we need a dedicated voice that can advocate for university records as a special data type within the university’s information governance structure and strategy, to ensure that these needs are not overlooked.

- There is insufficient staffing within the University Archives to adequately support the capture and management of executive level records and other records of enduring value.

- There is insufficient staffing within ITS to devote the necessary time to ensure the systems and tools they develop serve as effective systems of record for records management purposes.
There is no designated authority within departments for records management, and little to no central support for departmental personnel seeking to improve their unit’s records management practices. Records management training is at best largely ad-hoc, and could productively be provided centrally as a shared service.

E. Incentive gaps

- Often the units that feel the burden or pain when records are not preserved are not the ones that have control over the creation and maintenance of the records. The responsibility for using resources efficiently does not reside with those who have the capacity to effect change.

- The cost of storing and maintaining both digital and non-digital records is obscure and intangible to most employees, and is borne by many uncoordinated parties. There is a lack of dialogue around this issue, and there are ill-defined institutional incentives for units to manage important records and purge unneeded records.

- Employees often say that it is easier to keep information indefinitely than to make decisions about whether it is worth keeping. But stockpiling sensitive information exposes the university to avoidable legal and IT security risks, and compels the university to pay for unnecessary storage.

- A variety of pricing for different types of records storage perverts incentives to manage important records and purge unneeded records. For example, the storage of records in CTools, ImageNow, and the U-M email system is free to units, thus there is no incentive to ever purge data. Further, storage on university-managed shared drives cost money to units, which results in incentives to take records into the cloud.

- There is an institution-wide disconnect between those who own and manage records systems, those who own and utilize those records, and those with expertise in records management.

- There is a similar disconnect between those who create and first use a record and those who benefit in subsequent uses of the record over time. Record creators often lack incentives to preserve documentation of the intellectual and creative life of U-M so we can trace the evolution of our ideas, initiatives and priorities in the core areas of research, teaching and health care. The loss of irreplaceable information from early online bulletins is an example of a critical gap in the university’s institutional memory.

- There is a real time cost of losing evidence of past planning and decision-making when role transitions occur. There is no uniform off-boarding process relating to records management, and minimal consciousness around the importance of capturing records from outgoing personnel that might be relevant (or even critical) to future departmental operations.

- People are afraid of purging records and then later being criticized for doing so, such as when those records are requested through litigation or by a senior university official. Having standards and a retention schedule will make purging more defensible.
Recommendations

Nearly every aspect of U-M operations involves the creation and exchange of information in both digital and paper forms. The task force has found that the university has a critical need for a more effective and coordinated approach to managing its records and administrative information assets and systems. This need is only going to increase as the number and variety of technological tools available to our employees grows.

We recognize that resources are limited and that any solutions proposed must be lean and efficient. We do not suggest that all the gaps identified can realistically be closed in the near-term by our recommendations. However, the task force recommends that by implementing a small number of critical actions U-M can facilitate a meaningful improvement in its records management policies and practices over time, in a way that ultimately results in cost savings and operational efficiencies.

The task force makes the following recommendations. These are all considered essential and interdependent, and are listed in a sequential order rather than in order of importance:

1. **Commit to a sustained and coordinated institutional approach to records management**

   The Association of Records Managers and Administrators has created an information governance maturity model to help developing records programs map out their current state and future goals.\(^1\) Our version of this model (Appendix B) indicates the current state of records management at U-M. Adopting the recommendations below will push us one significant step down the road to respectability, but sustained improvement will require continued executive support, good planning, and effective program execution.

2. **Adopt the proposed records management governance structure**

   The proposed governance structure (Appendix C) will facilitate a shared services model for records management advice and support, while retaining flexibility for individual campuses and departments to develop local practices that suit their unique needs. Records experts and owners will continue to serve the same roles but will be better connected and supported. The task force also recommends the introduction of records unit liaisons drawn from units and departments, similar to HR and financial unit liaisons already in place.

3. **Establish and fund a new position, the University Records Manager**

   The governance structure introduces a new University Records Manager, reporting jointly to the chief information officer and the director of Bentley. This position is considered critical to coordinate the work recommended in this proposal. The University Records Manager will oversee the implementation and continued development of university policy and processes related to records management and serve as a university-wide point of coordination, education, authority

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\(^1\) [http://www.arma.org/garp/Garp%20maturity%20Model.pdf](http://www.arma.org/garp/Garp%20maturity%20Model.pdf)
and support for records and information management. This position and program would operate in an analogous way to the space utilization initiative. Without this role, there will continue to be a disconnect and lack of coordination and consistent practice between content owners, records experts and systems experts. This disconnection has contributed to the majority of gaps identified. A job description and program budget are provided in Appendix D.

4. **Support the implementation of the records management policy framework**

Early on in its work, the task force developed a policy development approach (Appendix E), which was endorsed by the task force sponsors on October 6, 2011. The task force proposed a policy framework modeled on the recently adopted IT policy framework.\(^2\) Under the framework, SPG policies contain high level directives, which should remain constant despite changes in compliance requirements, business practices, or technology. Policies incorporate references to standards and guidelines that can be updated more frequently and nimbly.

![Proposed records policy structure](image)

*Figure: Proposed policy structure: see Appendix E for more information*

5. **Adopt the proposed revision of SPG 601.8**

The revised policy (Appendix F), intended to replace both the existing SPG 601.8 and 601.8-1, sets out the high-level, long-term standards for record keeping responsibilities of employees and departments. This revised SPG includes the following changes:

- More clearly defines university records;
- States that the university owns its own records;
- Explains the role of executives, departments, individual employees and central units in ensuring that the university keeps good records;

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6. **Endorse the adoption of a new University Records Retention Schedule**

An initial version of the schedule was created by compiling the rules embodied in the current SPG, and through extensive consultation with associated business process owners across campus. However, creating a complete records schedule for U-M is a task to be approached incrementally over time, and will require annual review and maintenance as well as ongoing consultation with departments and administrative business process owners. An example of the information that will be conveyed in the retention schedule is attached as Appendix G. To make maintenance and use of the schedule more accessible, a web-based relational database to house the retention schedule has been developed by the task force. This project, which cost approximately $20,000, has already been jointly funded by our sponsors as an acknowledgement of the importance of this tool to U-M as a whole and the need for this work to continue.

7. **Adopt the proposed records policy and standards development plan**

This plan will facilitate consolidation of existing SPGs, the further augmentation of the records retention schedule, and the development of other needed standards and guidelines. The end goal is to have a single definitive set of principles around records (see Appendix H).

8. **Acknowledge the importance of technological tools to support records management and commit to work together to identify solutions**

Benchmarking and experience show that the failure of most archival and records management programs flows from a lack of sufficient tools. U-M units and subject matter experts have reported that this is one of their greatest challenges. The appropriate tools and systems can rationalize resources and eliminate redundant systems and processes; enforce time-based triggers for records scheduling events; automate the destruction of unneeded information; help users identify official versions of content; provide guidance for naming conventions and record filing; facilitate the search and retrieval of content; place e-discovery holds; and streamline the transfer of archival material. We need to continue to work together to explore tools. We recommend that the records manager work collaboratively over time with campus technology and records experts to identify tools most suitable to the U-M environment. Successful tools build upon established policy and retention standards. We cannot make meaningful recommendations about what tools are most appropriate until these foundational steps are complete.
Key benefits

The work of the task force has already produced tangible benefits. For example, the task force halted the acquisition of Google Message Discovery (Postini), a Google add-on that was being purchased as an archiving solution for executive email. In addition to costing $75,000 per year for 10 years, this tool would have exposed the university to unacceptable risks relating to sensitive-data compliance breaches and FOIA exposure, as well as incentivizing executives to use non-university systems for their communications. The task force facilitated a connection between records management experts (the Bentley), system experts (ITS), legal experts and the relevant content owners (executives) that enabled a proper analysis of the full implications of the system, and averted those costs and risks.

In addition, the task force’s efforts to elicit buy-in and gather data across campus have caused university leaders to reflect on and discuss information management with their staff. We have witnessed a growing enthusiasm and willingness to cooperate, which can be harnessed into forward motion if this proposal is adopted.

Benefits to U-M of improving our records management include:

- **More prudent use of institutional resources and a tangible capacity for future cost savings**
  - More efficient storage of digital and physical storage;
  - Reduced or eliminated need of units to make multiple individual inquiries of legal, audit, central process owners and the archives before disposing of unneeded records; and
  - Greatly enhanced capacity to coordinate and streamline outside vendor arrangements for storage and shredding services.

- **Reduced institutional risk**
  - Improved control over records so they can be found when needed, especially during legal discovery;
  - Better knowledge about the location and value of sensitive information so that its security can be appropriately protected;
  - Increased compliance with laws and external standards; and
  - Better identification of vital records to ensure business continuity.

- **Enhanced access to long-term institutional memory and preservation of records with high cultural value in the University Archives**

- **Clearer roles and responsibilities for executives, units and employees**
  - Less frustration of employees when it is clear what their responsibilities are; and
  - Designation of the owner of the official copy of a record encourages owners to take proper care, and empowers others units to dispose of duplicate records, freeing up resources.

- **Improved coordination, reduced duplication and greater alignment of effort between the work of systems experts and the needs of content experts**
Why now, in this economic climate?

We recognize that resources are limited, the economic climate is discouraging, U-M’s leaders and employees are stretched thin by many competing priorities, and scrutiny of the institution is at an all-time high. The task force carefully weighed these factors before making the recommendations contained in this report, and determined that now is the time to act for the following reasons:

1. **Because we cannot afford to wait any longer from a technological standpoint.** In recent years, email has already led to loss of executive correspondence records. The migration to cloud-based services, such as Google, and burgeoning use of personally owned devices like iPads and smartphones, is exposing us to new and additional risks. These challenges will continue to increase as the number and variety of technological tools grows.

2. **Because we cannot afford to wait any longer from a historical standpoint.** Right now, and over the next couple of years, there are and will be many changeovers occurring in U-M executive and senior leadership positions. If we do not act now to improve records management, we risk a massive loss of records from the last decade. In addition, we would miss a critical opportunity to bring new executives and leaders on board with initiation into a new and improved approach from the outset.

3. **Because we can save money and improve productivity.** Our proposal represents a lean and efficient solution that will achieve the goal of improving record-keeping practice and policy while also getting a good return on investment. By reducing the very significant over-retention of redundant and obsolete records, costs can be saved in both physical and digital space. By centralizing the research about record-keeping requirements, time can be saved that currently is wasted through duplication of effort. By introducing standards that improving the baseline quality of our records management practices, the inefficiencies and frustrations experienced when trying to find information about decisions and past practice can be reduced, and productivity gains can be realized.

4. **Because it makes sense and aligns with other university initiatives.** Our recommendations are designed to complement and support other ongoing university-wide administrative streamlining and cost containment initiatives, including NextGen Michigan, IT rationalization, space utilization, Planet Blue, and the transformation of administrative services. Our focus is to produce, over time, significant operational efficiencies and ultimately aggregate cost savings. These will be achieved by developing a consistent process improvement strategy with more standardized metrics and practices. In addition, the structure proposed will promote better leveraging of shared expertise in records management across campus.

5. **Because the culture is ready.** Through conferring with over 85 staff and groups across all U-M’s campuses, we found that there is a positive energy and appetite across the institution at all levels for improving how we handle our records.
Methodology and key findings

Our recommendations have emerged from a deep and broad investigation into the current record-keeping practices inside and outside U-M.

We began by surveying the policies and programs of other institutions, focusing on our peers in Michigan and the CIC, as well as institutions with superior records programs. This benchmarking demonstrated U-M’s pronounced inadequacies – U-M’s policies are outdated and uncoordinated, and little structure exists to keep them current and aligned with evolving business practices and changing technologies. Most importantly, the lack of a records retention schedule emerged as a glaring embarrassment. The task force studied the policies and governance structures of our peers and cherry-picked the best features. Several of our recommendations (for example the make-up and role of the University Records Steering Committee) derive directly from our analysis of other strong programs.

Our next task was to identify the costs and risks associated with poor records management at U-M. Our attempts to gather baseline data were often hindered by the fact that practices are uncoordinated, disparate and inconsistent. Data that we initially assumed staff or units use to manage their systems is simply not being created. For example, administrators of ImageNow and LSA’s shared drive could not easily (or even with difficulty) produce data about the age and amount of data stored by unit users. Similarly, the general counsel’s office did not have information on the cost of document discovery conducted by outside counsel. In addition, while the provost’s Office of Space Planning does track storage space, there is no easy way to quantify the cost of space devoted to the storage of business records. We had hoped to use these types of data to identify specific cost savings deliverable through better records management, but instead we recommend that the new University Records Manager soon after starting identify and develop metrics to demonstrate the value and impact of this work moving forward.

Despite a lack of data, we were able to draw important conclusions about how sub-par records management hurts U-M. We interviewed staff members who administer legal discovery, Freedom of Information Act requests, tax audits, Occupational Health and Safety inspections, and risk management on campus. We heard similar stories from all of them: units on campus often keep multiple copies of records much longer than needed. Conducting a search of all relevant record collections is therefore unduly expensive, time-consuming and complicated. Units want to do the right thing, but are unsure whether a particular record is maintained centrally or whether their copy is unique. Clarifying where the “official copy” of a record resides would allow units to clean house and eliminate shadow record-keeping systems.

We identified other costs associated with over-retention. Interviews with the administrators of CTools, LSA’s shared drive, and ImageNow confirmed that the accumulation of more and more digital content complicates the process of system upgrades. Finding easy ways to define the expected
lifetime of data at its point of creation would eliminate the need for ad hoc analysis later, and drastically reduce the costs spent endlessly migrating old, useless data from system to system.

Paper records also consume storage resources. Procurement Services gave us data on third-party storage and shredding services. Over the past five years, the university has spent more than $12 million on 22 different external vendors for records storage and shredding services. This is most likely an underestimate, given that it only represents expenditure processed through Procurement and not costs incurred by departments directly or mis-coded in the system. We conclude that coordinating the contracting for these services could result in significant savings.

In all, we have conferred with more than 85 experts across all U-M campuses related to record-keeping practice and policy, including seeking their feedback on our draft SPG revision. Through these interactions, we consistently found that there is a positive energy and appetite across the institution for improving how we handle our records. The time is right to implement the recommendations of this task force.

Appendices

A: Records Management Task Force charge (endorsed by executive officers on July 19, 2011)
B: Maturity model for records management at U-M
C: Governance structure for records management at U-M
D: University records manager role description and budget
E: Policy development approach (endorsed by task force sponsors on October 6, 2011)
F: Proposed records management policy (to replace SPG 601.8 and 601.8-1)
G: Draft retention schedule (excerpt only)
H: Records policy, standards and guidelines development plan
Name Records Management Task Force

Project title Planning a U-M records management and retention policy and program

Sponsorship
Fran Blouin, Director, Bentley Historical Library
Laura Patterson, Chief Information Officer and Associate Vice President
Suellyn Scarnecchia, Vice President and General Counsel
Carol Senneff, Executive Director, University Audits

Purpose and context
U-M has significant stewardship responsibilities related to the millions of records it generates annually. This stewardship has operational, administrative, legal, and historical components. Unlike many of its peer institutions, U-M has never promulgated a comprehensive, institution-wide records management and retention policy. There are several existing, unconnected Standard Practice Guide policies which have not been reviewed or revised in many years and which, in any event, do not provide guidance to campus units that result in systematic, consistent and effective records management. In addition, new technologies for the creation, circulation and retention of information challenge traditional record-keeping practices. In general, records management at U-M is at best an afterthought for most units and staff members, with resulting consequences of significant operational inefficiencies and lost productivity and historical legacy.

A successful records management policy and program will appropriately balance the interests of different internal and external stakeholders, and will:
- ensure compliance with applicable laws and regulations, promote operational efficiency, and manage institutional risk by specifying requirements and standards for the consistent management of records across the university;
- identify and effectively communicate mandatory and desired standards of practice with appropriate monitoring for compliance;
- preserve U-M historical records and legacy for future generations of scholars and researchers;
- complement current university-wide administrative streamlining initiatives; and
- require a clear mandate and the active support of U-M executive officers and academic and business leadership.

Charge
To identify and recommend policies, standards, guidelines, tools and other strategies that the University of Michigan should adopt to ensure that it creates and keeps the necessary (and disposes of no longer needed) records* of its activities to achieve its missions, meet its fiscal, legal, administrative and historical responsibilities, and optimize its use of space and time.

Benefits and objectives
- Improved institutional knowledge and control of the location and content of university records
- Improved ability to exploit and share university records as information assets within and across units
- Improved ability to create, capture and exploit records of enduring value at the University Archives and Record Program at the Bentley Historical Library
- Reduced cost and effort in finding and using the university’s records, streamlining administrative burden
- Ability to respond to legal discovery, regulatory compliance, audits and FOIA requests more efficiently and effectively
- Reduced risk related to keeping sensitive but unneeded information
- Reduced risk of the loss of mission-critical records
- Reduced costs for physical and digital records storage related to unnecessary information

*Records include both digital and physical materials.
- Reduction in the amount of data that must be transferred and managed during system upgrades
- Increased knowledge of university staff in best practices for creating, storing, retrieving and destroying records at the end of their lifecycle

**Scope and Boundaries**
The Task Force will consider records management across the whole of U-M, but it is acknowledged that the scope of any policy or solutions proposed will need to give careful consideration to: what constitutes university records; what is covered (e.g., what document types in what formats); who is bound by requirements (e.g., faculty and staff, but not students) and how parts of U-M are covered (e.g., Health System, Dearborn and Flint campuses).

**Membership**
Nancy Bartlett, Bentley Historical Library
Aprille McKay, Bentley Historical Library
Alan Levy, ITS Information and Infrastructure Assurance
Fiona Linn, Office of the General Counsel
Jennifer Vitale, University Audits

**Consultation**
Input from stakeholders from all campuses will be sought and incorporated throughout the process. Preliminary/interim policies and guidelines will be posted and disseminated to solicit feedback. The Task Force will seek the expertise of units with specialized record-keeping responsibilities (e.g., Finance, Health System, Human Resources, Registrar) in making its recommendations.

**Resources and Support**
Task Force members will contribute their time to this project. Some time may also be sought from other units and stakeholders for consultation purposes. Any additional implementation resources required will be separately sought in future as needed.

**Deliverables**
- Gap analysis of U-M’s current records management policies and practices including technological gaps for managing electronic records
- Records management policy framework
  - Revised SPG policies relating to records management**, with an associated communication and implementation plan including unit-specific policies and practice
  - Framework for campus standards and guidelines for the management of records, including retention/destruction
  - Records management checklists for employees for the entire duration of their appointment including leaving the university or changing roles
  - Plan for recurring education and awareness program
- Business case for a campus-wide records management program, including resource needs and recommendations for technological solutions

**Timeline**
July-December, 2011: Scope current state of U-M records management practices, benchmark and conduct gap analysis; develop high-level policy framework.
January-July, 2012: Develop more detailed retention standards and educational materials; identify additional implementation steps required and prepare the business case.

*University records are currently defined in SPG 601.8 as all records, regardless of their form, prepared, owned, used, in the possession of, or retained by administrators, faculty acting in administrative capacities, and staff of university units in the performance of an official function.

**Current SPG policies that deal with records retention and/or management include:**
- 201.46/Personnel Records: Revised 1991
- 518.1 /Payroll Controls: Revised 2010
- 601.8/University Archives and Records: Issued 1992
- 601.11/Privacy and the Need to Monitor and Access Records: Issued 1993; Revised 2004
WHERE WE ARE NOW

- Lack of coordination and no defined accountability around records management efforts
- Wide variability of practices and mixed success in managing records across the institution
- Policies and processes are uncoordinated, outdated, and unclear
- Information about records management is not easily accessible to employees
- Rules and guidelines are not regularly updated or maintained
- Space and time is wasted by keeping records indefinitely and in multiple places

WHERE WE WANT TO BE

- Coordinated approach to records management
- Defined accountability with shared responsibility at all levels of the institution
- Optimized processes, tools, and systems to make records management a seamless part of U-M operations
- Measurable outcomes and improvements
- Clearer information and more knowledgeable employees
- Demonstrable compliance with laws and standards
- Increasingly integrated governance of records, data, and information

ACCOUNTABILITY & POLICY

- Define accountability for records management institutionally
- Establish records management governance and responsibility structure
- Develop and document better policies & processes

INTEGRITY & AVAILABILITY OF RECORDS

- Conduct a coordinated risk assessment of record integrity and availability
- Reduce duplication and improve how records are categorized and stored
- Implement better systems and practices for how to manage records

RETENTION & DISPOSITION OF RECORDS

- Establish a university retention schedule
- Improve standards and guidance around retention and disposition of records
- Implement better systems and practices for retention and disposition of records

PRIVACY & COMPLIANCE

- Review policies and practices relating to privacy and sensitive information
- Improve and simplify guidance and policies around privacy and sensitive information
- Implement tools to improve privacy and compliance of records
APPENDIX C: Proposed Governance Structure – Records Management at U-M

University Records Steering Committee
- Executive Director, University Audits
- VP & General Counsel
- Chief Information Officer
- Director, Bentley Historical Library

Role of committee: Set priorities; champion institutional initiatives around records; advocate for capital resources where required.

Peer Advisory Committee
- Standing members:
  - University records manager
  - Reps of each of steering committee sponsors
- Ad hoc members:
  - Subject matter specialists brought in as needed
  - Unit liaison reps brought in as needed
  - Faculty representatives brought in as needed

Role of committee: Support records manager in design and implementation of policy and priorities; connect records manager with people and resources across U-M to assist their work; serve as operational level champions for institutional initiatives around records.

University Records Manager
- Oversee policy implementation and compliance
- Provide a university-wide point of coordination, education, authority and support for records and information management
- Centrally monitor and support the development of unit-level records procedures
- Maintain retention schedule for University records in consultation with the Bentley, other records specialists and unit liaisons
- Facilitate a process for authorizing the proper destruction of records (e.g., if units are not sure something can be destroyed)
- Convene University Records Steering Committee and Peer Advisory Committee

University Records Specialists and Stewards
- Records content specialists (e.g. HR, Finance, Registrar, Bentley, Libraries, Development, Research, Medical, OSEH)
- Systems specialists (e.g. ITS, MCIT, Digital Curation, Libraries, Procurement, Space Utilization Initiative)
- Records management specialists (e.g. Bentley, OGC, Audits, Internal Controls)
- Change management specialists (e.g. HR, ITS, Bentley)

Records unit liaisons
- Point of contact within unit for education and communication about records issues
- Serve as an advocate for good records management in their unit
- Help unit leadership develop local records procedures and guidance as appropriate
- Represent the interests and needs of their unit in U-M wide records management development efforts

Deans and Directors
- Schools, Colleges and Institutes

EVP & CFO
- Provost & EVP Academic Affairs

Records creators
- Faculty, staff, affiliates
Appendix D

University Records Manager Role Description and Budget

(DRAFT)

<table>
<thead>
<tr>
<th>Title:</th>
<th>University Records Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description:</td>
<td>The University Records Manager will report jointly to the Chief Information Officer and the Director of the Bentley. This position will oversee the implementation and continued development of university policy and processes related to records management and serve as a university-wide point of coordination, education, authority and support for records management. The role will be expected to operate with an understanding of records as part of a broader information and data governance system, and lead the management of records in an ever-changing technological and information systems environment. Critical to the success of this role will be a constant interaction and collaboration with the Bentley Historical Library (including its Archives and Digital Curation divisions), other records and systems specialists, and unit liaisons across U-M. The duties and scope of this role are expected to evolve over time as the maturity of the university’s records management program grows.</td>
</tr>
</tbody>
</table>
| Duties:           | 1. Proactively develop and support a culture of high quality records management practice across the University.  
2. Engage and collaborate with the Bentley Historical Library (including its Archives and Digital Curation divisions), other records and systems specialists, internal business and compliance experts, and unit liaisons across U-M in all aspects of the records management program.  
3. Provide expertise and oversight in developing, updating, and disseminating university policies and procedures related to managing records and other information resources including research data.  
4. Maintain a retention schedule for University records in consultation with the Bentley Historical Library, other records specialists and unit liaisons, to facilitate the appropriate destruction or archiving of records.  
5. Actively communicate to and educate the campus community about individual and department responsibilities relating to records management, including through maintenance of a records management website (with appropriate IT support).  
6. Serve as a university-wide point of coordination, education and support for records management.  
7. Coordinate compliance with legal and regulatory requirements and University policies related to records and information management.  
8. Provide leadership and expertise in coordinating and implementing an innovative and effective University records management program. |
9. Pursue in collaboration with campus units, such as procurement and space utilization, innovative records management solutions that result in enhanced cost effectiveness, cost savings and administrative streamlining.

10. Centrally monitor and support the development of unit-level records procedures.

11. Monitor, develop and communicate best practices, technological developments and preservation strategies for physical and digital records maintained in distributed and diverse environments across the University.

12. Identify and develop metrics to demonstrate the value and impact of this work moving forward.

13. Convene a University Records Steering Committee and Peer Advisory Committee.

14. Provide regular updates about the records management program to the campus community via multiple communication channels.

15. Manage and monitor program budgets and resources.

16. Perform other duties as appropriate.

**Qualifications:**

*Required:* Master’s degree, preferably in information studies with specialization in archival administration or digital curation, supplemented by three to six years of experience in archival administration, records management, or digital curation.

*Preferred:* JD degree in addition to Master’s degree

**Knowledge of:**

1. Principles and practices of records management including records retention laws
2. Manual and electronic records management systems
3. Various software packages including word processing, spreadsheet, database and database management
4. Principles and practices of data collection and report preparation
5. The organization and operation of the University of Michigan as necessary to assume responsibilities for the records management program

**Ability to:**

1. Develop and maintain complex records management program
2. Liaise effectively with employees and administrators at all levels and across all areas of the university
3. Analyze problems, identify alternative solutions, project consequences of proposed actions, and implement recommendations in support of goals
4. Respond to requests for information regarding records management policies, best practices, tools and other resources
5. Train employees for compliance with records management policy and use of records schedule and other tools and resources
Budget

We estimate that the overall budget for implementing the institutional changes recommended amounts to $140,000 – $150,000 per year.

This estimate includes the salary package for the records manager, professional development, ongoing IT support for the records management database (retention schedule) and internal operations, web support, design and consultation for training methodology and materials, hosting expenses for meetings with unit liaisons, interns from the School of Information and/or support staff.

Relevant sources consulted to estimate the appropriate salary for the records manager included:

- Society of American Archivists
- ARMA International (Association of Records Managers and Administrators)
- University Human Resources
- Select peer institutions’ records manager positions
- Current U-M salaries for similar kinds of positions (including senior archivists, associate provost for space planning, freedom of information coordinator)
Appendix E

U-M Records Management: Recommended Policy Approach

Developing a policy framework: authorization and scope

The responsibility for developing a new policy framework for the management of university records has been assigned to the Records Management Task Force (“task force”). This is a temporary body that will not be responsible for maintenance of the policy framework. The charge of the task force is:

To identify and recommend policies, standards, guidelines, tools and other strategies that the University of Michigan should adopt to ensure that it creates and keeps the necessary (and disposes of no longer needed) records of its activities to achieve its missions, meet its fiscal, legal, administrative and historical responsibilities, and optimize its use of space and time.

The records policy framework will incorporate policies, standards and guidelines that inform the university community of requirements and best practices in records management. The policy framework is intended to cover everyone conducting the business of the university – including, faculty, regular and temporary staff, student employees, contractors and adjuncts – although how the framework applies to and is communicated to different groups will necessarily differ.

The policy framework is intended to cover all campuses, including Flint, Dearborn, and the Health System, although the extent to which different campuses and records types are covered will be explored during the development phase. Campus and unit-level policies and guidelines will be gathered to determine best practice and make recommendations as to the most appropriate university-wide approach. Unit-level procedures will continue to be an important component of the new framework, to reflect localized practices and requirements.

Rationale

U-M has significant stewardship responsibilities related to the millions of records it generates annually. This stewardship has operational, administrative, legal, and historical components. Unlike many of its peer institutions, U-M has never promulgated a comprehensive, institution-wide records management and retention policy. There are several existing, unconnected Standard Practice Guide policies which have not been reviewed or revised in many years and which, in any event, do not provide guidance to campus units that result in systematic, consistent and effective records management, retention and destruction.

The records management policy framework will strive to:

- Ensure compliance with applicable laws and regulations, promote operational efficiency, and manage institutional risk by specifying requirements and standards for the consistent management of records across the university;
- Identify and effectively communicate mandatory and desired standards of practice with appropriate monitoring for compliance;
- Preserve U-M historical records and legacy for future generations of scholars and researchers; and
- Complement current university-wide administrative streamlining initiatives.

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1 This document was endorsed by the Records Management Task Force sponsors on October 6, 2011.
2 Current SPG policies that deal with records retention and/or management include: 201.46 Personnel Records (Revised 1991), 518.1 Payroll Controls (Revised 2010), 601.8 University Archives and Records (Issued 1992), 601.8-1 Identification, Maintenance, and Preservation of Digital Records (Issued 1997; Revised 2009), 601.11 Privacy and the Need to Monitor and Access Records (Issued 1993; Revised 2004), 604.1 Departmental Record Retention for Business and Financial Records (Issued 1985; Revised 1997).
Roles and responsibilities for records management

The records management policy framework will clarify ongoing roles of the various staff positions, groups or units most involved in records management at U-M. This includes a clearer delineation of responsibilities for university records at all stages of the records life cycle (from creation through to archiving/destruction):

- Key University records stewards, being subject matter experts in a particular area of records management. Their expertise may be in a specialized records type (e.g., personnel records or student records) or in the records life cycle itself (e.g., archivists at the Bentley Historical Library). Note that the designation of records stewards will have regard to and align with existing data steward and data management obligations defined in SPG 601.12;
- Senior managers (including executive officers and deans);
- Unit managers (including department chairs, directors, supervisors) – who will be encouraged to appoint records unit liaisons, similar to the security/finance/HR unit liaison networks already in operation;
- Faculty and regular staff; and
- Other people conducting the business of the university – including temporary staff, student employees, contractors and adjuncts.

Governance of the records policy framework

The policy framework requires an ongoing governance structure that assigns responsibility for implementing and administering the framework moving forward. Future management will incorporate:

- Coordination of records policy and underlying development, dissemination, and education;
- Ongoing review and analysis of existing policies for continued applicability and effectiveness; and
- Interpretation of policy as it applies to specific issues, situations and incidents.

The following structure will vest meaningful authority in a designated university officer and make use of existing internal expertise in records management while minimizing the need for additional staff or bureaucracy:

<table>
<thead>
<tr>
<th>Position or group</th>
<th>Role in records management governance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Executive officers</td>
<td>Approve university-wide policies (SPG)</td>
</tr>
</tbody>
</table>
| Executive-level records champion(s) | Ultimate accountability for implementation, resourcing and maintenance of the framework  
Approve sub-SPG standards and university-wide guidance |
| University records manager | Operationally coordinate and implement the policy framework  
Provide a university-wide point of coordination, authority and support for records management  
Centrally monitor and support the development of unit-level records procedures  
Facilitate a process for authorizing the proper destruction of records (e.g., if units are not sure something can be destroyed) |
| Standing committee of key stakeholders  
*Convened by records manager, with representation from Bentley, Audit, IT, OGC, plus subject matter experts (e.g., HR, finance, academic), operational area experts (e.g., UMHS, Flint or Dearborn), and faculty experts brought in as necessary* | Review and endorse changes to university-wide records policies and guidance  
Provide expert support to records manager, as required, on issues relevant to the operation of the records management framework |
| Unit leadership  
*e.g., dean, department chair, administrator – as determined for each area based on their management structure* | Develop unit-level records procedures and supplemental retention schedules for unique records; assign unit liaisons for records as appropriate |
Records Policy Structure and Criteria

The records management policy framework will incorporate several tiers of requirements and guidance:

- **University policies** articulate the university’s values, principles, strategies, and positions relative to a broad topic. They are concise, high-level and intended to be of long-term application (e.g., in the case of records, they would be independent of a given technology or record type). University policies set expectations for administrative operation of the University, mandate individual and organizational behavior for employees and departments, and provide a baseline for departments to follow in conducting the business of the university. University policies are mandatory. All new or substantially revised policies, once approved by the Executive Officers, will be submitted to University Audit for inclusion in the Standard Practice Guide.

  **Example:** Records Management Policy

- **University records standards** specify requirements for becoming compliant with university records policy, other university policies, as well as applicable laws and regulations. They are more detail oriented than policies, and may include technical specifications. As a result, they are more changeable than policies and tend to develop or change over time. Standards are mandatory and will be hosted on a central records website and incorporated by reference in the relevant University policy.

  **Examples:**
  - University Retention Schedule
  - Standards for specific types of records (e.g., Personnel, Finance)
  - Roles and responsibilities document

- **University records guidelines** provide guidance and best practices relative to a particular records management topic. They may accompany, interpret, or provide guidance for implementing the records management policies and standards, other university policies, or applicable laws and regulations. University records guidelines are not mandatory, but rather communicate what the university would like employees and units to do in certain areas. In addition, guidelines can provide a helpful starting point in cases where guidance is necessary but not implementable across the university within a reasonable time frame — in which case guidelines will be more appropriate than a mandatory policy or standard (for instance, if a new type of record format, new genre of information or new technology for managing records arises).

  **Examples:**
  - Records Management Manual
  - Records checklists and guidelines

- **Unit-level records procedures** document “how to” implement the university policies and standards, localized to reflect the practices or requirements of a specific unit (or campus). They will include assignment of responsibility for various critical records and affirm individual employee expectations. Note that templates or models for unit-level procedures may be presented as University records guidelines.

  **Examples:**
  - LS&A Record Retention Schedule
  - Unit-level records implementation plans
  - Unit-level vital records list and management plan

The records management framework will also reference relevant external requirements, such as legal and regulatory obligations (e.g., FERPA, HIPAA, FOIA, litigation holds and subpoenas), and incorporate other relevant university requirements, such as campus level policies (e.g., UMHS, Flint or Dearborn policies) and internal control processes.

A preliminary organization of topic areas to be incorporated in each policy and guidance tier is summarized in the **Appendix: Preliminary Records Management Policy Overview.**
Policy development principles

The development and maintenance of the records management policy framework will employ the following principles:

(a) How policy framework will be developed

- Policy development will be accomplished by the task force, in collaboration with stakeholders and appropriate subject matter experts.
- The policy development process will be transparent. Campus stakeholders will be engaged throughout the process – in both individual and group settings – to ensure that all appropriate perspectives are heard, accounted for and incorporated as feasible in final versions of policies, standards and guidelines. The task force will develop a list of potential stakeholders to be involved at various stages in the records policy life cycle process. Draft policy documents will be posted on a records website and disseminated to various stakeholder groups to solicit feedback.
- Benchmarking will be utilized where appropriate to determine the policy and practices of comparable institutions.
- The policy development process will be flexible. Circumstances may necessitate the publishing of best practices as a stop-gap to provide immediate guidance while a policy is developed, vetted, and approved. In other cases, a policy may be established with detailed guidance to be provided at a later time.
- Future policy work (including policy review) will be initiated when there is a compelling need for new or revised policy. Triggers may include new technologies, new laws or regulations, or operational or compliance needs that are not appropriately covered by existing policies or guidance documents. In addition, any unit may request consideration of new records policies or changes to existing policies that apply university-wide.
- Future policy development (including policy review) will be accomplished via individual workgroups convened to address specific topics, similar to the task force convened to conduct the initial records management policy development. Workgroups will include appropriate subject matter experts. The unit ultimately assigned responsibility for maintenance of the records framework will provide a central coordination function for policy development, to ensure consistency and to address policy dependencies.

(b) Policy content

- Policies and guidance developed will be practical, implementable and sustainable.
- Impact analysis on both records systems and end-users should be included in the policy planning processes.
- University-wide policies will be considered a floor, not a ceiling. Unit-level policies, guidelines, standards, or procedures may be developed to supplement university-wide guidance. They must meet the minimum criteria set forth in university-wide policies and related guidance, but may be more restrictive or detailed.
Policy life cycle process

In developing the records management policy framework, the task force will be guided by the following process, based on the Policy Development Process With Best Practices issued by the Association of College and University Policy Administrators:

1. Identification, Planning and Initiation
   a. Identify compelling need for new or updated policy/guidance – drivers may include new regulatory requirements, technology developments, operational needs and identification of current issues or gaps
   b. Determine whether the need should be satisfied by a policy, guideline, or standard
   c. Identify sponsorship, stakeholders, working group members and their relevant roles
   d. Develop high level implementation impact analysis
   e. Obtain approval to proceed with draft policy (or guideline, standard)
   f. Prioritize and schedule policy work

2. Development, Review, and Approval
   a. Draft initial policy (guideline, standard)
   b. Distribute to a small group of stakeholders for initial review and input
   c. Incorporate initial feedback
   d. Distribute to a larger group of stakeholders for review and input
   e. Post final draft on the records web site for general feedback
   f. Review and, where appropriate, incorporate feedback
   g. Present to appropriate governance entity for approval
   h. Obtain approval

3. Rollout
   a. Post and announce guidance (policy standard, guideline)
   b. Conduct educational activities
   c. Initiate implementation activities (efforts to develop/update standards and guidelines may be needed for some new policies)
   d. Determine ongoing review cycle (default review cycle is annual)

4. Compliance, Review and Maintenance
   a. Monitor compliance and effectiveness of implemented guidance
   b. Review and implement modifications per annual review cycle (last revision and review dates shall be posted on each policy)
   c. As part of review, reassess the categorization of guidance as a policy, standard or guideline

5. Policy Retirement
   a. As part of the maintenance and review process, policies, standards, and/or guidelines may be identified as out-of-date or no longer needed – they will be retired via the same process by which they were approved
## Appendix: Preliminary Records Management Policy Overview

<table>
<thead>
<tr>
<th>Policy (SPG)</th>
<th>Records Standards</th>
<th>Records Guidelines</th>
</tr>
</thead>
<tbody>
<tr>
<td>Set institutional tone; What we need employees to do; High level mandates for employees; Long term, high level principles; Identify agents of authority/accountability</td>
<td>Still mandated, but more detail oriented; “How to” implement the policy; Focused on units more than individuals; Changeable, will develop over time; Identify agents of responsibility</td>
<td>What we want employees and units to do; Best practices; Guidance to help implement policy and standards; Guidance that is hard to implement therefore not mandatory</td>
</tr>
</tbody>
</table>

### Institutional tone
- U-M will create and keep the necessary (and dispose of no longer necessary) records of its activities to achieve its missions, meet its fiscal, legal, administrative and historical responsibilities, and optimize its use of space and time.
- U-M will create and manage the records that are appropriate to meet its historical goals, to ensure business continuity and effective administration, to meet legal and compliance obligations, and to minimize risks.
- Balance between retention and destruction.
- Recognize that operations and risks of different units vary greatly, and that what constitutes an appropriate and useful records system differs. This policy provides the minimum criteria that all U-M units must meet, and it is up to each unit to develop supplemental policies or procedures appropriate to their operations.

### Employee obligations
- Create records that adequately document their University activities and decisions.
- Capture important records in a U-M records system, in accordance with their unit’s practices.
- Comply with retention schedules as relevant to their role and in accordance with directions from the records custodians in their unit.
- Stewardship obligations (privacy, security, access)

### Key unit responsibilities
- Have a local level procedure or plan in place that documents how to implement the SPG and associated standards, as appropriate to unit operations.

### Governance/accountabilities

### University Retention Schedule
- Generic records – present in all or most units
- Administered/updated by committee (expert custodians, a University Records Manager, unit liaison representatives)?

### Roles and Responsibilities document
- Including a final authority for questions/disputes

### Standards for University Information Systems

### Unit Policies to supplement SPG – including supplemental retention schedules as required
- This may only be needed in high risk units (high visibility, special activities, strict regulatory requirements, vital records to the institution)
- Note resource implications for creating retention schedules – records survey required
- Approved by a central authority (e.g., University Records Manager)?

### Unit Implementation Plans
- Basic plan for how units will implement the requirements of the SPG
- Approved by central authority?

### Vital Records that must be maintained and retained (e.g. bulletins)

### Standards for outsourcing records storage and destruction
- Contractual requirements for contracts with third party custodians
- Preferred suppliers for third party custodians (storage and destruction)

[Note this is a very preliminary sample of possible topics only]
- Maintaining a good filing system
- Leaving the University or changing roles
- Deciding if a record is worth keeping
- Responding to or preparing for a FOIA request, subpoena, or audit
- Record keeping charge for Deans and Directors
- Record keeping charge for Department Chairs
- Mobile/off-site work: how to handle your records
- Electronic records and email
- Exercising good version control
- Snapshotting perpetual/active records
- Continuity planning: what records are essential to your work and how can you protect them?
- When personal and business records mix – and whose responsibility it is to separate them out
- Self assessment gap analysis tool for basic units (for use in implementation planning)
- Template for unit implementation plan and unit specific policies/procedures
- Guidelines on how to create a supplemental retention schedule where needed by a unit (e.g., because they have unique vital records)
- Role based orientation guides for faculty and staff
Appendix F

Proposed Records Management Policy

Replacement for SPG 601.8 and SPG 601.8-1

DRAFT 30 July 2012

As a center for knowledge, discovery, and education, and as a publicly funded institution, the university has significant stewardship responsibilities related to the millions of records it produces annually. The University of Michigan is committed to creating and managing the records that are necessary to preserve its historical legacy, to ensure continuity of operations and effective administration, to meet legal, regulatory and fiscal responsibilities, and to optimize its use of space and time.

This policy documents the responsibilities of departments and employees for records management in respect of their own university activities and functions. In communicating this policy, the university recognizes that as a diverse and decentralized institution, which generates a massive volume of records across many technologies and in many different forms, what constitutes a compliant and practical records system will differ across units. Record creation and retention efforts need to be proportionate to the value of the records, the time and cost associated with keeping them and the legal duties associated with them.

1. General principles regarding university records

For the purpose of this policy, a university record is any form of recorded information created or received by University of Michigan employees in the execution of their university duties or roles, or in the course of university operations or business, other than medical records.

All university records are the property of the University of Michigan, regardless of their form or location, subject to two qualifications:

a. Scholarly records are authored by faculty within the scope of their employment as part of or in connection with their teaching, research, or scholarship. The university vests primary control (and in some cases unrestricted ownership) of scholarly records in the faculty who create them: see Policy on who holds copyright at or in affiliation with the University of Michigan (SPG 601.28)¹ for further information.

b. Personal (non-work) records created or stored by university employees on university systems remain the property of the employee. However, it is the responsibility of each employee to organize their records in a way that separates their personal and work information as much as possible, and enables work records to be retrieved if a legitimate business need arises.

Administrative records that provide evidence of the university's organization, functions, policies, decisions, procedures, operations, transactions, or other activities must be created, managed, and

¹ http://spg.umich.edu/pdf/601.28.pdf
preserved in a way that ensures they are locatable and usable for as long as is appropriate: see the University Retention Schedule\(^2\) for the university’s retention and destruction requirements. Official records of the university should always be retrievable through university systems and not dependent on personally owned property for access or preservation.

Senior executives and administrative and academic leaders have a significant and specifically defined role in documenting and retaining evidence of institutional decisions and initiatives and the rationale behind them. Standards, guidelines and training will help them manage their records in a way that facilitates retention or destruction where appropriate and allows the university to assume custody over time of official records with enduring operational and/or historical value. Executives and the Bentley Historical Library will collaborate to identify, in the context of each executive portfolio, what records capture the institutional memory or are otherwise historically significant.

2. **Central administrative records**

Certain types of administrative records are collated and managed by central offices within the University, who serve as the keeper of the official record on behalf of the university.

Departments are not required to maintain local duplicates of records that are centrally held or stored in a university system of record, and are encouraged to dispose of such duplicates once their active reference use has ceased.

University Records Standards\(^3\) may be promulgated under this policy by central units responsible for certain specialized records. Standards specify more detailed requirements for becoming compliant with university policy, laws, and regulations relating to records.

3. **Divisional responsibilities**

U-M is a diverse and decentralized institution and what constitutes a compliant and practical records system will differ across units. In addition to following the general approach and minimum requirements enunciated in this policy, it is expected that each school, college or division will develop supplemental policies or procedures where necessary, to suit its operations, needs, and risks.

In accordance with their school, college or divisional guidance, each unit should strive to create, maintain and preserve university records that are vital to its functions; that document decisions of importance; and/or otherwise have enduring historical value by providing a reflection of the activities and achievements of the institution.

Each school, college or division is responsible for ensuring that its organizational units:

a. Have and communicate clear guidance to employees about how, when and where records should be captured or managed, appropriate to operations, needs, and risks;

b. Identify one or more records liaisons (either at the unit or divisional level), who can serve as a contact for both employees and central offices in the implementation of this policy;  

\(^2\) Under development. A live link will be included when the University Retention Schedule is available.  
\(^3\) A live link will be included here to a page of record standards, currently under development.
c. Comply with any University Records Standards\(^4\) promulgated under this policy, as relevant to individual operations;

d. Manage recorded information in accordance with legal requirements and other University policies, including the Institutional Data Resource Management Policy (SPG 601.12)\(^5\) and Privacy and the Need to Monitor and Access Records Policy (SPG 601.11)\(^6\);

e. Regularly determine whether records should be transferred to the Bentley Historical Library or disposed of in accordance with the University Retention Schedule\(^7\) (unless a unit has particular needs or uses that warrant longer retention than the minimum periods contained in the Schedule);

f. Consults with employees who are leaving the unit concerning the existence and location of their university records and what will happen to those records when the employee leaves; and

g. Monitor to ensure its employees are complying with this policy.

4. Employee responsibilities

Successful records management depends on the active participation of individual employees, who are carrying out the university’s activities and making the university’s decisions. All employees, in the execution of their university duties, are responsible for:

a. Creating records that adequately and accurately document the activities and decisions of the university in which they take part, in accordance with the guidance of their unit and supervisor;

b. Organizing and storing their work-related records so that they are accessible to others in the university with a legitimate need to access them. For records captured in University of Michigan records systems, this includes describing the records adequately to allow the university to find, store, dispose of and/or archive them in accordance with business and legal requirements;

c. Protecting sensitive information that they use in the course of their work, by managing access to and security of any university records containing sensitive information as reasonable and appropriate;

d. Following the University Retention Schedule\(^8\) and any University, divisional or unit level guidance relating to records management, as relevant to their role; and

e. Cooperating in a timely manner with any requests to locate and provide records that may be necessary to allow the university to comply with legal obligations, such as the Freedom of Information Act, subpoenas, or regulatory compliance requirements.

5. Implementation and enforcement of this policy

For information about governance and responsibilities under the policy, see [here]\(^9\).

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\(^4\) A live link will be included here to a page of record standards, currently under development.

\(^5\) http://spg.umich.edu/pdf/601.12.pdf

\(^6\) http://spg.umich.edu/pdf/601.11.pdf

\(^7\) Under development. A live link will be included when the University Retention Schedule is available.

\(^8\) Under development. A live link will be included when the University Retention Schedule is available.

\(^9\) A live link will be included, linking to the final records management governance structure.
**Appendix G: Draft General Retention Schedule Excerpt**

This table presents a view of the retention and disposition rules relating to specific categories of records. These rules are intended to provide minimum retention recommendations for types of records that are maintained by many university units. Schools, Colleges or other divisions may promulgate additional guidance regarding the management of records. This table presents the information that would be available to a university employee consulting the reference. A university records manager would maintain additional information about the policies, laws and regulations that pertain to a rule, effective dates, and contact information for business process owners and other experts who recommended or approved the rule.

<table>
<thead>
<tr>
<th>Series name, number and description</th>
<th>Retention</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Administration</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accreditation (See also: Self Studies) – AR001</td>
<td>Final report – retain in office until superseded</td>
<td>Transfer to Bentley</td>
</tr>
<tr>
<td>Departmental, college, school, program and/or North Central Association. May include correspondence, reports, questionnaires, guides.</td>
<td>All other records – no mandatory retention</td>
<td>Destroy in office when administrative value ends.</td>
</tr>
<tr>
<td>Activities and Events (see also: Conferences and Workshops) – AR002</td>
<td>3 years</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td>Activities and events that are initiated or sponsored by the University including publicity, invitations, photographs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative reference – AR003</td>
<td>No mandatory retention.</td>
<td>Destroy in office when administrative value ends</td>
</tr>
<tr>
<td>Convenience and reference records of transitory value. May include articles, research references, brochures, duplicates, announcements.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Annual Reports – AR004</td>
<td>Permanent</td>
<td>Transfer 1 copy to Bentley; maintain 1 copy in office permanently.</td>
</tr>
<tr>
<td>Report of work completed by office, unit, department, division, college/school each year. May include slides for “State of the School” address, video.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Calendar of Events – AR005</td>
<td>3 years after current year</td>
<td>Transfer 1 copy to Bentley</td>
</tr>
<tr>
<td>Used for keeping track of activities and events</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Series name, number and description</td>
<td>Retention</td>
<td>Action</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>-----------</td>
<td>--------</td>
</tr>
<tr>
<td><strong>General Administration, cont’d</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Committees, Councils, Task Forces (See also: Job File; Tenure &amp; Promotion) -- AR006</strong>&lt;br&gt;Official university committees, councils or task forces appointed, elected or ad hoc, including correspondence, minutes, agendas, lists of members, reports, briefing materials, working papers.</td>
<td>Official copies -- 1 year after end of current year or at the termination of the group's work</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td><strong>Conferences, Training Programs and Workshops -- Attended -- AR007</strong>&lt;br&gt;May include agendas, handouts, training materials, travel.</td>
<td>No mandatory retention</td>
<td>Destroy in office when reference value ends</td>
</tr>
<tr>
<td><strong>Conferences, Training Programs and Workshops -- Conducted -- AR008</strong>&lt;br&gt;University initiated or sponsored conferences, programs or workshops. May include correspondence, agendas, handouts, training materials, critiques, reports, contracts, registration materials.</td>
<td>Official copy -- 6 years</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td><strong>Copyright records -- AR009</strong>&lt;br&gt;Records related to preparation, filing, and licensing. May include applications, registration, notices, correspondence, licenses.</td>
<td>Duration of copyright -- often 95 years</td>
<td>Retain in unit during duration of copyright term</td>
</tr>
<tr>
<td><strong>Executive Administrative (See also AR030) -- AR010</strong>&lt;br&gt;Correspondence and subject files of unit executives relating to the unit's business. This is meant to cover types of records not otherwise designated by another series.</td>
<td>3 years</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td><strong>News Releases and Public Relations (See also: Website) -- AR011</strong>&lt;br&gt;Information used to promote the university and university activities. May include photographs, press kits, press releases.</td>
<td>Official copy -- 3 years</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td><strong>Planning -- AR012</strong>&lt;br&gt;Planning activities of the university, divisions, departments and units. May include correspondence, reports, statistics.</td>
<td>Official copy -- 3 years</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td></td>
<td>Other copies -- no mandatory retention</td>
<td>Destroy in office when administrative value ends</td>
</tr>
<tr>
<td>Series name, number and description</td>
<td>Retention</td>
<td>Action</td>
</tr>
<tr>
<td>----------------------------------------------------------------</td>
<td>-----------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td><strong>Human Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Affirmative Action Plans – AR013</strong></td>
<td>Retain in office until superseded</td>
<td>Transfer to Bentley</td>
</tr>
<tr>
<td>Policies, practices, and procedures undertaken to ensure that all qualified applicants and employees are receiving an equal opportunity for recruitment, selection, advancement. A plan may be created university-wide or at any level of university hierarchy.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Americans with Disabilities Act (ADA) Compliance -- AR014</strong></td>
<td>Retain in local personnel file 7 years past termination or 2 years past the death or a retiree, whichever is later.</td>
<td>Destroy in office.</td>
</tr>
<tr>
<td>Efforts to comply with the Americans with Disabilities Act. May include reports, correspondence, procedures, complaints</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Annual Performance Reviews – AR015</strong></td>
<td>Retain in local personnel file 7 years past termination or 2 years past the death or a retiree, whichever is later.</td>
<td>Securely destroy in office.</td>
</tr>
<tr>
<td>Documentation of the annual assessment of the employee’s performance, conducted by the employee’s manager or supervisor. If the local unit submits the performance review to the University HR file through ImageNow, University HR will maintain the record for the duration of the retention period.</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Awards and Honors -- AR016</strong></td>
<td>Notification of awards -- personnel and student record.</td>
<td>Transfer to appropriate personnel or student file.</td>
</tr>
<tr>
<td>Faculty, staff, student and alumni awards not associated with grants. Records may include applications, nominations, criteria, transcripts, vitae, press releases and funding data.</td>
<td>List of award recipients - permanent</td>
<td>Transfer to Bentley</td>
</tr>
<tr>
<td><strong>Biographical -- AR017</strong></td>
<td>Faculty and Executive Officers -- duration of employment plus 1 year</td>
<td>Transfer to Bentley for review</td>
</tr>
<tr>
<td>Biographical information for faculty and staff, including vitae, clippings, photographs, speeches.</td>
<td>Other records -- mandatory retention destroy in office when administrative value ends</td>
<td></td>
</tr>
<tr>
<td><strong>Employee manuals and handbooks -- AR018</strong></td>
<td>Retain in office until superseded</td>
<td>Transfer to Bentley</td>
</tr>
<tr>
<td>A book or digital document given to employees by an employer that contains information about the employer’s policies and procedures. These guides are distributed by many different organizational levels at the university, from a department or school to university-wide.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Series name, number and description</td>
<td>Retention</td>
<td>Action</td>
</tr>
<tr>
<td>------------------------------------</td>
<td>-----------</td>
<td>--------</td>
</tr>
<tr>
<td><strong>Human Resources, cont’d</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Employee moving and relocation expense reimbursement – AR019**  
Records relating to the University’s reimbursement of employee moving and relocation expenses. | 7 years | Destroy in office |
| **Employment contracts and offer letters – AR020**  
An agreement between an employer and employee which regulates the terms and conditions of employment in his or her workplace, his or her duties, and the duties of the employer. This can include positions of a definite term of years, and could be embodied in an offer letter. | Official copy – Central personnel file – 7 years past termination or 2 years past the death of a retiree, whichever is later  
Reference copy – Local office personnel file – 7 years past termination or 2 years past the death of a retiree, whichever is later | Hiring unit should transmit a copy of the contract or letter to the appropriate HR office.  
Securely destroy In office |
| **Employment Eligibility Certificate (verification form) – AR021**  
Form to verify the immigration status of an employee (I-9) | Official copy – Central personnel file – 3 years after date of hiring or 1 year from termination date whichever is later | Securely destroy |
| **Immigration status documents – AR022**  
Documents related to the immigration status of employees or visiting scholars. | Official copy – International Center – Indefinite retention | Maintain |
| **Job file – AR023**  
Hiring managers or committees should create a "job file" for records related to the work of filling a position: job descriptions, postings and advertisements, pre-screening documentation, search firm correspondence, job applications, list of candidates to be interviewed, interview questions and notes, feedback from faculty and staff, visit itineraries, hiring recommendations, etc. | Official copy – local office – 4 years from the start date of the successful candidate | For executive officer, dean and director searches, transfer files to the Bentley. For all other searches, destroy files securely. |
Appendix H

Records Policy, Standards and Guidelines Development Plan

The Records Task Force has gathered records management policies and procedures and documented practices at several levels of university organization. A major goal of the new program will be to consolidate, update and rationalize conflicting guidance and to publish and proselytize best practices, in consultation with the creators, custodians and users of the records. The proposed Governance Structure (Appendix C) and Policy Development Approach (Appendix E) will fix the context of the work. The following plan provides a punch-list of tasks for the records manager.

Records Policies

Policies articulate the university’s values, principles, strategies, and positions relative to a broad topic. They are concise, high-level and intended to be of long-term application (e.g., in the case of records, they would be independent of a given technology or record type). University policies set expectations for administrative operation of the University, mandate individual and organizational behavior for employees and departments, and provide a baseline for departments to follow in conducting the business of the university. University policies are mandatory. All new or substantially revised policies, once approved by the Executive Officers, will be submitted to University Audit for inclusion in the Standard Practice Guide.

We have proposed a new comprehensive records policy (Appendix F), which would supersede the current SPG 601.8 and 601.8-1. There are, in addition, 11 SPG’s that touch on record-keeping topics. Some contain a paragraph about record retention that could be absorbed into the retention schedule and deleted from the SPG, some contain procedural guidance that could exist outside of the SPG structure in a record-keeping standard,
and some merely need to be updated to reflect the new policy. The records manager will reach out and collaborate with the owners of the SPGs to consolidate, decommission or update existing SPG’s.

The following SPGs and other records-related policies should be reviewed as part of the policy consolidation process:

<table>
<thead>
<tr>
<th>SPG</th>
<th>Title</th>
<th>Suggested action</th>
<th>Issued by</th>
<th>Last revised</th>
</tr>
</thead>
<tbody>
<tr>
<td>601.8</td>
<td>University Archives and Records</td>
<td>Principles absorbed into new SPG 601.8</td>
<td>President</td>
<td>6/1/1992</td>
</tr>
<tr>
<td>601.8-1</td>
<td>Identification, Maintenance &amp; Preservation of Digital Records Created by U-M</td>
<td>Principles absorbed into new SPG 601.8</td>
<td>Provost, Bentley</td>
<td>7/10/2009</td>
</tr>
<tr>
<td>602.05</td>
<td>Use and release of donor and alumni information</td>
<td>Should be reviewed and revised or converted to a standard</td>
<td>VP Development</td>
<td>2/1/2006</td>
</tr>
<tr>
<td>602.06</td>
<td>Alumni directories</td>
<td>Should be reviewed and revised or converted to a standard</td>
<td>VP Development</td>
<td>2/1/2006</td>
</tr>
<tr>
<td>604.1</td>
<td>Department Record Retention for Business and Finance Records</td>
<td>Should be reviewed and revised (retention details absorbed into general records retention schedule)</td>
<td>Audits, Financial Operations, Bentley</td>
<td>5/30/1997</td>
</tr>
<tr>
<td>SPG</td>
<td>Title</td>
<td>Suggested action</td>
<td>Issued by</td>
<td>Last revised</td>
</tr>
<tr>
<td>-------</td>
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</tr>
<tr>
<td>201.22</td>
<td>Recruitment and Selection of all Regular Faculty and Staff</td>
<td>Should be reviewed and revised (retention details absorbed into general retention schedule)</td>
<td>University HR, Provost</td>
<td>10/1/2011</td>
</tr>
<tr>
<td>201.46</td>
<td>Personnel Records – Collection, Retention and Release</td>
<td>Should be reviewed and revised</td>
<td>Personnel Office, AVPAA-Personnel</td>
<td>10/1/1991</td>
</tr>
<tr>
<td>601.1</td>
<td>Freedom of Speech &amp; Artistic Expression</td>
<td>Principles inform new records management policy</td>
<td>President</td>
<td>4/1/1993</td>
</tr>
<tr>
<td>601.28</td>
<td>Who Holds Copyright at or in Affiliation with the University of Michigan</td>
<td>Principles inform new records management policy</td>
<td>Provost</td>
<td>9/21/2011</td>
</tr>
<tr>
<td>500.01</td>
<td>Fiscal Responsibilities</td>
<td>Principles inform new records management policy</td>
<td>Chief Financial Officer</td>
<td>5/25/2011</td>
</tr>
</tbody>
</table>

In addition, the following other documents, requirements or policies are relevant to records management, and should be reviewed as part of the process:

<table>
<thead>
<tr>
<th>Document title</th>
<th>Issued/maintained by</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regents resolution creating the University archives, Nov 1936</td>
<td>Regents</td>
</tr>
<tr>
<td>Regents Bylaw 14.07 – Privacy and Access to Information</td>
<td>Regents</td>
</tr>
<tr>
<td>Regents Bylaw 11.48 – UMHHC: Disclosure of Hospitals’ and Health Centers’ Records</td>
<td>Regents</td>
</tr>
<tr>
<td>UMHS Policy re Confidentiality of Patient Records &amp; Notice of Privacy Principles</td>
<td>UMHS Compliance</td>
</tr>
<tr>
<td>Student Rights and Student Records: U-M “Policy” (on Registrar’s website: <a href="http://ro.umich.edu/ferpa/">http://ro.umich.edu/ferpa/</a>)</td>
<td>Registrar</td>
</tr>
</tbody>
</table>
Standards
Standards specify requirements for becoming compliant with university records policy, other university policies, as well as applicable laws and regulations. They are more detail oriented than policies, and may include technical specifications. As a result, they are more changeable than policies and tend to develop or change over time. Standards are mandatory and will be hosted on a central records website and incorporated by reference in the relevant University policy.

Standards will:
- Mandate requirements, but more detail oriented than policy
- Express “how to” implement the policy
- Focus on units more than individuals
- Develop over time, and have more changeable content than policy
- Identify agents of responsibility

Existing standards
The following existing standards should be reviewed and suggestions for revisions made, if necessary:

<table>
<thead>
<tr>
<th>Document title</th>
<th>Issued/maintained by</th>
<th>Last revised</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement on Stewardship (<a href="http://www.hr.umich.edu/stewardship.html">http://www.hr.umich.edu/stewardship.html</a>)</td>
<td>Human Resources</td>
<td>Unknown</td>
</tr>
<tr>
<td>Student Rights and Student Records: U-M “Policy” (on Registrar’s website: <a href="http://ro.umich.edu/ferpa/">http://ro.umich.edu/ferpa/</a>)</td>
<td>Registrar</td>
<td>Sept 2010</td>
</tr>
<tr>
<td>Department level policies and retention schedules</td>
<td>Various</td>
<td>Unknown</td>
</tr>
<tr>
<td>Faculty Handbook – Chapter 12: University Records, Privacy, and Access to Information</td>
<td>Provost</td>
<td>Unknown</td>
</tr>
<tr>
<td>Staff Handbook – personnel records; ethics &amp; compliance</td>
<td>Human Resources</td>
<td>Unknown</td>
</tr>
</tbody>
</table>
What standards should be developed?

- **University General Retention Schedule**
  - Generic records – present in all or most units
  - Begin by capturing current practice and filling in gaps where there is no guidance
  - Identify which office maintains the official copy of a record so other units can dispose of copies when local reference value ends
  - Validated by committee (expert custodians, a University Records Manager, unit liaison representatives)

- **Roles and Responsibilities document**
  - Including a final authority for questions/disputes

- **Standards for University information systems**

- **Unit policies to supplement SPG** – including supplemental retention schedules as required
  - This may only be needed in high risk units (high visibility, special activities, strict regulatory requirements, vital records to the institution)
  - Note resource implications for creating retention schedules – records survey required
  - Approved by a central authority (e.g., University Records Manager)?

- **Unit level records procedures**
  - Basic plan for how units will implement the requirements of the SPG
  - Coordinated with records manager

- **Documented methodologies for increased care in handling records of high value** (e.g. Bulletins, tenure and promotion cases)

- **Standards for outsourcing records storage and destruction in coordination with Procurement**
  - Recommendations for contractual requirements for Procurement contracts with third party custodians
  - Preferred suppliers for third party custodians (storage and destruction)

- **Standards for use of University space for records in coordination with Space Utilization**
  - Defined and prioritized
  - Tracked so internal space cost can be measured and monitored

**Records Guidelines**

What are guidelines?

Guidelines provide guidance and best practices relative to a particular records management topic. They may accompany, interpret, or provide guidance for implementing the records management policies and standards, other university policies, or applicable laws and regulations. University records guidelines are not mandatory, but rather communicate what the university would like employees and units to do in certain areas. In addition, guidelines can provide a helpful starting point in cases where guidance is necessary but not implementable across the university within a reasonable time frame – in which case guidelines will be more appropriate than a
mandatory policy or standard (for instance, if a new type of record format, new genre of information or new technology for managing records arises).

Guidelines include:

- What we want employees and units to do;
- Best practices;
- Guidance to help implement policy and standards;
- Guidance that is hard to implement therefore not mandatory
- FAQs

What guidelines should be developed?

- Suggested strategy and template for unit records plan and unit specific policies/procedures
- Guidance about where to create and store university records
- Maintaining a good filing system
- Leaving the University or changing roles
- Deciding if a record is worth keeping
- How to securely destroy records
- Responding to or preparing for a FOIA request, subpoena, or audit
- Record keeping charge for Executive Officers, Deans and Directors with potential linkage to:
  - Training for leadership on record-keeping expectations
  - Contractual term for university access to records of decisions
  - Collaboration with Bentley leadership for opportunities for use of records as information assets
- Record keeping charge for Department Chairs
- Mobile/off-site work: how to handle your records
- Electronic records and email
- Exercising good version control
- Snapshotting perpetual/active records
- Continuity planning: what records are essential to your work and how can you protect them?
- When personal and business records mix – and whose responsibility it is to separate them out
- Self-assessment gap analysis tool for units
- Guidelines on how to create a supplemental retention schedule where needed by a unit (e.g., because they have unique vital records)
- Role based orientation guides for faculty and staff
- Revise existing guidance on how to transfer archival records to the Bentley with particular attention to digital records