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 Policy Task Force (“Task Force”).¹ 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 policies² 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.

¹ A copy of the charge document, approved for the Task Force by its sponsors and subsequently endorsed by the Executive Officers on 19 July 2011, is attached in Appendix 1.

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>
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</thead>
<tbody>
<tr>
<td>Executive officers</td>
<td>Approve university-wide policies (SPG)</td>
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<tr>
<td>Executive-level records champion</td>
<td>Ultimate accountability for implementation, resourcing and maintenance of the framework</td>
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<td></td>
<td>Approve sub-SPG standards and university-wide guidance</td>
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<tr>
<td>University records manager</td>
<td>Operationally coordinate and implement the policy framework</td>
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<td>Provide a university-wide point of coordination, authority and support for records management</td>
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<td>Centrally monitor and support the development of unit-level records procedures</td>
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<td>Facilitate a process for authorizing the proper destruction of records (e.g., if units are not sure something can be destroyed)</td>
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<tr>
<td>Standing committee of key stakeholders</td>
<td>Review and endorse changes to university-wide records policies and guidance</td>
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<td>Convened by records manager, with representation from Bentley, Audit, IT, OGC, plus subject matter experts (e.g., HR, finance, academic) and operational area experts (e.g., UMHS, Flint or Dearborn) brought in as necessary</td>
<td>Provide expert support to records manager, as required, on issues relevant to the operation of the records management framework</td>
</tr>
<tr>
<td>Unit leadership</td>
<td>Develop unit-level records procedures and supplemental retention schedules for unique records</td>
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<tr>
<td>e.g., dean, department chair, administrator – as determined for each area based on their management structure</td>
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</table>
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 Appendix 2: 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 1: Committee Charge

<table>
<thead>
<tr>
<th>Name</th>
<th>Records Management Task Force</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project title</td>
<td>Planning a U-M records management and retention policy and program</td>
</tr>
<tr>
<td>Sponsorship</td>
<td>Fran Blouin, Director, Bentley Historical Library</td>
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<tr>
<td></td>
<td>Laura Patterson, Chief Information Officer and Associate Vice President</td>
</tr>
<tr>
<td></td>
<td>Suellyn Scarneccia, Vice President and General Counsel</td>
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<tr>
<td></td>
<td>Carol Senneff, Executive Director, University Audits</td>
</tr>
</tbody>
</table>

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
- 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.

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*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
### Appendix 2: Preliminary Records Management Policy Overview

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

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### Institutional tone

- **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)

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**[DRAFT: Preliminary and Advisory – Not for Circulation](#)**

**9/28/2011**