Records Management: What’s in it for Information Technology?
Reduced risk and costs when no longer retaining unnecessary information, that’s what!
Discussion today

• Records retention periods for records most commonly found in the Information Technology area

• Why keeping everything is not a good idea

• How we can work together to reduce risk and costs for UC
About the Schedule

Knowing what records to keep and for how long is challenging. A records retention schedule defines the period of time that records should be retained and when they should be destroyed. Various requirements based in law and university policy govern the retention of administrative records. A retention schedule is critical for promoting responsible records management, mitigating risk, and ensuring consistent compliance across UC. The University Records Management Committee (RMC) is charged with developing and maintaining the universitywide records retention schedule. To gain an understanding on how to use the schedule, review this webinar. Questions regarding the schedule should be directed to the appropriate campus Records Management Coordinator.

It is important for all members of the University community to adhere to the retention periods in the schedule (except in the cases of a records hold). The schedule serves as the lawful authorization for the disposition of records; consequences of not following the schedule may include court-imposed legal sanctions.

Schedule update project

The RMC currently is conducting a systemwide project to update the records retention schedule. See Schedule Update Project for more information.

Records included in the schedule

Per University policy, RMP-1, “University Records Management Program,” and except as superseded by federal laws and regulations, and university contracts, the retention schedule applies to all administrative records, regardless of their medium, owned by the

- University of California campuses and the Office of the President,
- University of California health sciences centers, and
- Department of Energy laboratories managed by the University of California.

The schedule does not apply to

- Administrative records held by the Principal Officers of The Regents,
- Teaching and research records (e.g., library materials, faculty research and teaching materials, student examinations), or
- Records pertaining to individual patient care (medical records).

Records holds

If pending, foreseeable, or ongoing litigation; an investigation; or an ongoing audit pertaining to the records is taking place, the records cannot be destroyed until these actions have been completed or resolved. For information about records holds, contact your campus records management coordinator.

Appreciation goes to the University of Denver, the National Historical Publications and Records Commission, and Harvard University for their free, open-source, web-based software tool, which UC enhanced to use for managing, and distributing the UC records retention schedule. See http://library1.du.edu/site/about/rump/recordsAuthority.php and http://code.google.com/p/records-authority/ for more information.
About the Schedule

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### Summary of ITS Records Retention Periods

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<td>General Routine Office Transitory Records. Transitory records</td>
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<td>0002A*</td>
<td>Program administration - records of enduring historical value</td>
<td>Coordinate the transfer of these records to the University Archives when no longer needed for current operational business.</td>
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<td>Financial and Procurement Records. Accounts Payable/Receivable, Procurement and Banking/Cash Handling Records document the payment of bills and the receipt of revenues owed to the University</td>
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<td>System documentation for projects that are implemented</td>
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**Notes**

Content in systems, shared drives, collaboration tools such as SharePoint, and websites (as well as those systems/programs developed in the future that are used to house content) is not covered in this section. The content will fall in other parts of the retention schedule, depending on what is documented. Before decommissioning shared drives, collaboration tools, or websites, etc., the owner of the content should specify what needs to be captured and how, and then that content should be returned to the owner for retention purposes.

1. Records document routine general office activities. "Routine" means activities related to the typical internal operation of an office, including: staffing, administrative procedures, systems, and communications.

2. Records document organizational activities (letters, acknowledgements, memos, notes, transmittals, e-mail messages).

3. These records document the establishment, evolution/changes, consolidation, and disestablishment of university departments & programs.

4. Contact Judy Peck in Records Management Services to see if these records should be part of the records collection she manages.

5. Records used as supporting documentation for sponsored activities will need to be retained for 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer. Sponsored activities means that the funds are received under grants, donations, or contracts from sources (private, state, federal, etc.) outside UC.

6. Source code, test scripts, test automation, and other intellectual property created while internally developing systems are not included in this group of records. These are found in the Program Administration Records - Program Administration Records of enduring historical value section of the retention schedule.

7. A project is closed out when (1) the system, system enhancements, or changes have been declared operational and ready for production; or (2) a project is terminated for any reason.
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3. These records document the establishment, evolution/changes, consolidation, and disestablishment of university departments & programs.

4. Contact your university archivist to see if these records should be part of your location’s university archives. For UCOP, contact Judy Peck to see if the records should be a part of the records collection she manages.
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5. Records used as supporting documentation for sponsored activities will need to be retained for 6 years after the expiration/termination of the sponsored activities; resolution of any litigation, claim, or audit; or the period stated in the award document - whichever is longer. Sponsored activities means that the funds are received under grants, donations, or contracts from sources (private, state, federal, etc.) outside UC.

### Glossary:

**Sponsored activity/activities** – are contract-specified activities that are funded with some or all external money of a sponsor, such as activities of a project funded from a research grant or contract.
9. Information Technology Records

9.A. IT Proposals, Design and Implementation Records

IT Proposals, Design and Implementation Records document information technology systems and systems enhancements from the time of concept through the completion of a project. The systems include internally developed systems and websites as well as vendor systems. These records found in all media (paper, electronic, or otherwise) may include but are not limited to:

- planning records such as proposals, design documents, prototypes, write-ups of issues or gaps, performance improvements records, and proof of concept records;
- approval records;
- project planning and management records;
- system documentation such as business requirements, functional requirements, mapping specifications, data models, reporting requirements, workflow diagrams, data dictionaries or metadata registries, and testing records;
- quality assurance and change management records;
- implementation schedules and presentations; and
- communications records.

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9. Information Technology Records
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6. Source code, test scripts, test automation, and other intellectual property created while internally developing systems are not included in this group of records. These are found in the Program Administration Records - Program Administration Records of enduring historical value section of the retention schedule.

- system documentation such as business requirements, functional requirements, mapping specifications, data models, reporting requirements, workflow diagrams, data dictionaries or metadata registries, and testing records;
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6. N/A for this item.

7. A project is closed out when (1) the system, system enhancements, or changes have been declared operational and ready for production; or (2) a project is terminated for any reason.

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**Glossary:**

**Sponsored activity/activities** – are contract-specified activities that are funded with some or all external money of a sponsor, such as activities of a project funded from a research grant or contract.
Summary of ITS Records Retention Periods
9. Information Technology Records
9.B. IT Operations Records

IT Operations Records document the Information Technology services provided to maintain systems and infrastructure at the University. The systems include internally developed systems and websites as well as vendor systems. These records found in all media (paper, electronic, or otherwise) may include but are not limited to:

- systems support and service requests records such as help desk logs and reports that document, control, monitor, and track requests through resolution for system, network, and operational problems;
- contingency records such as risk management plans, disaster recovery plans, resumption of business plans, mitigation plans, and backup and recovery procedures;
- IT asset management records, including inventories and licenses records;
- infrastructure maintenance records of preventative, corrective, adaptive and enhancement activities; and
- schedules, reports and other records that document systems operations performance and use.

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Are there any circumstances when you should not follow the retention schedule?

Yes, there are several important situations that must be considered:

• If pending, foreseeable, or ongoing litigation; an investigation; or an ongoing audit pertaining to the records is taking place, the records cannot be destroyed until these actions have been completed or resolved.

This is called a “Records Freeze.”
Are there any circumstances when you should not follow the retention schedule?

• If a federal or state statute or regulation specifies a longer retention period for any records, the statute or regulation overrides this schedule. Please notify your campus Records Management Coordinator about the requirement. The Records Management Coordinator will work with the Records Management Committee to change the schedule.
Are there any circumstances when you should not follow the retention schedule?

• If there is a legitimate business need to retain records longer than the period identified in the retention schedule, please contact your campus Records Management Coordinator to identify the needs. The Records Management Coordinator can also discuss with the RMC to determine if the schedule should be changed.
Storage is cheap!
Why not keep everything?
Digital Hoarding!
Storage may be cheap, but how much will it cost to manage it all?

- Between 95%-98% of our records do not need to be retained permanently.
- Will the public appreciate us maintaining everything over time or will they perceive this as a waste of their tax dollars?
- What does “manage it” mean?
What does “manage it” mean?

Keep everything accessible over time:

1. Migrate everything as systems become obsolete or storage medium changes. Preserve the content, context and structure of the records over time and space.
   a. How will you know if you have done this?
   b. Who will be able to interpret the records over time to validate their authenticity?
   c. Security rights may change over time, how will you manage this?
Content should be preserved when migrating or reformatting electronic records.

CREATING AN OFFICE FILE PLAN

- Inventory office’s files
- List file series/systems
- Describe each series/system
- Cite disposition authority and retention
- Place at beginning of files
- Annotate with changes
- Review and update annually

EXAMPLE: PowerPoint Presentation Slide in PowerPoint
Content should be preserved when migrating or reformatting electronic records.

EXAMPLE: PowerPoint Presentation Slide “printed” to PDF
What does “manage it” mean?

Produce things for Audits, Investigations, Discovery or Public Records Act Requests?

1. How will you know if you have it?

2. If you have it:
   a. You must produce it!
   b. If everyone who was involved with the activity no longer work at UC, will you know how to interpret it?
   c. When there is more than one copy, will you know which copy is the official and complete copy?
Ten Factors Driving The Total Cost of Owning Unstructured Information

Cost Drivers: Examples

1. Outdated, unenforceable policies
2. Poorly defined information ownership & governance
3. Open loop, reactive e-discovery processes
4. Uncontrolled information repositories
5. Modernist, paper-focused information rules
6. Ad hoc, unstructured business processes
7. Siloed governance efforts

Cost Reducers: Examples

1. E-Discovery
2. Disposition
3. Classification & Organization
4. Digitization & Automation
5. Storage and Network Infrastructure
6. Information Search, Access, Collaboration
7. Migration
8. Policy Management & Compliance
9. Discovering & Structuring Business Process
10. Knowledge Capture & Transfer


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Documents discovered versus documents actually used in litigation [1044:1]
“E-Discovery. Finding, processing, and producing information to support lawsuits, investigations and audits. Unstructured information is typically the most common target in e-discovery, and a poorly managed information environment can add millions of dollars in cost to large lawsuits. Simply reviewing a gigabyte of information for litigation can cost $14,000.”

How we can work together to reduce risk and costs for UC
Definitions

Archive:
IT = to back up
RM = to select a group of records and preserve them

Record:
IT = a complete item in a database
RM = any item, regardless of physical form, that qualifies as a record

“Any writing, regardless of physical form or characteristics, containing information relating to the conduct of the public’s business prepared, owned, used, or retained by an operating unit or employee of the university.”
It is important to build good recordkeeping practices into systems.

Records are identified and methods are used to capture fixed records to provide evidence of an activity.

Building systems with rules that assist with:

- Records capture,
- Records retention schedules,
- Records maintenance and storage, and
- Records access issues.
Recordkeeping business rules need to be built into systems. Rules that dictate:

- What is a record
- How and when records will be created or captured
- How they will be maintained and used, and
- How long the records will be maintained
We used to have the records in (paper or microfilm/fiche) but we had them scanned and then we destroyed the other records. Now we are finding out that no one checked the scans to make sure they were legible.
Someone’s medical information

Enough information for Identity Theft
Even if just 1,000 terabytes (a petabyte) could be disposed of, the unnecessary cost (or waste) is $2.5 million per year, it is important to consider what might have been sacrificed to maintain this unnecessary data. Many corporations have experienced staff reductions in the last few years. If an office worker costs a company an average of $120,000 per year ($100,000 salary and $20,000 in overhead for benefits, computer, etc.), an unfortunate equation emerges. For every worker laid off, the hypothetical corporation chose to store 24 terabytes of information with no value or obligation associated with it.
Here are some recordkeeping requirements to consider:

1. What records need to be created or kept that document the functions/activities?

2. What will be required to supply appropriate content, context and structure of the records before the records are captured in a fixed method?

3. How will these records be captured so they are fixed?

4. If retention periods for the records change, how will the new retention period be transitioned into the system?
Here are some recordkeeping requirements to consider:

5. How will records be maintained through the retention period?

6. How will any downloads of data be managed so that renegade standalone systems are not created without the proper recordkeeping requirements attached to them?

7. How will records be deleted from the system when their retention period has lapsed?
Here are some recordkeeping requirements to consider:

8. Will the organization want to delete all associated metadata when the records are deleted, if not, what will need to be retained and for how long?

9. How will records be protected from deletion when there is a hold on destruction?

10. How will the records with permanent retention be preserved and accessible over time?
Here are some recordkeeping requirements to consider:

11. What system documentation will need to be created to document recordkeeping processes?

12. What training will be provided to users to ensure they are aware of their recordkeeping responsibilities?

(Caveat: this list of considerations may not be all-inclusive, but should generate contemplation when designing, implementing, and/or managing an electronic records/information management system.)
What we have discussed today:

• Records retention periods for records most commonly found in the Information Technology area
• Why keeping everything is not a good idea
• How we can work together to reduce risk and costs for UC
Laurie Sletten, CRM, CA
Records Manager
Laurie.Sletten@ucop.edu
Phone: (510) 987-9411