

The Records Management Challenge – A Community Based Learning Opportunity

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Introduction

As defined by *ISO 15489-1*, and confirmed by the InterPares 2 Project, Records Management is "...responsible for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records." Be it a corporate conglomeration, educational institution, or small family run business, the very activities and actions performed within the entity are encapsulated in the records created. Records Management controls the processes involved in the creation and maintenance of records. It not only encompasses the gathering of accumulated records, but establishes a framework intended to determine exactly what it is we wish to create, define exactly what it is we wish to keep and how long we should keep it for, and to establish how to best protect and propagate the information contained therein. In an effort to refine its Records Management implementation, the University of British Columbia (UBC) has issued the *Records Management Challenge – A Community-Based Learning Opportunity*.

The core approach of this initiative was to have SLAIS graduate students issue a Records Management survey to ten (10) universities comparable to UBC so as to establish the extent of their Records Management programs. Data concerning issues such as "...existing policies and guidelines, reporting structure, number of employees, services offered, measurable impacts (financial, environmental, organizational, etc.)..."¹ was collected. This paper analyzes the information gathered from the Records Management department of the Texas Agricultural and Mechanical University (TAMU). In addition, this paper compares that information to that of the UBC Records Management Services as well as to international best practices established in *ISO*

¹ *The Records Management Challenge – A Community-Based Learning Opportunity Prompt*

Standard 15489. In accordance with the *Records Management Challenge* 'Project Details', this paper's intent is to "... find out UBC's status amongst universities with RM programs in order to determine UBC's administrative, economic, and environmental next steps."²

UBC Records Management Program Overview

Note: The information provided within this section is sourced entirely from the survey answers as completed by UBC Records Manager Mr. Alan Doyle, in addition to information made readily available on the UBC Records Management website.

UBC is a provincially supported public institution with approximately forty-five thousand (45,000) students and fourteen-thousand five hundred (14,500) staff and faculty. The head archivist is Christopher Hives and the records manager is Alan Doyle. Staff pertaining to archives and records management is as follows: three (3) archivists and two (2) archival support staff. In the 1990's UBC's University Administration deemed it necessary to create a committee that would in turn create a policy to "...guide the development of the Archives".³ This committee was named the University Archives Advisory Committee and later, the University Archives and Records Management Advisory Committee (UARMAC). This committee helped lay the foundation for UBC's Record Management Program.

*you
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relationship
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the archival
& RM
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archival*

The main policy that the UBC Archives and Records Management Program follow is University Policy #117. This policy was developed by UBC Legal Counsel in conjunction with the Freedom of Information Manager. Although Legal Counsel is specifically named in the records

² *The Records Management Challenge – A Community-Based Learning Opportunity Prompt*

³ University of British Columbia University Archives, "University Archives and Records Management Advisory Committee 1991-2004," 29 June 2010, The University of British Columbia, 12 Nov. 2010 <<http://www.library.ubc.ca/archives/uarmac.html>>.

management policy, that is the extent of their relationship with the records manager. While UBC does have a formal records management program, there is currently no campus-wide mandate for e-records management. This may be, in part, due to the distant relationship with campus Information Technology (IT). However, there is a formal e-records management program in the planning stages that is budget dependent. The current budget for the program only includes the record manager's salary and is controlled by the University Archives. UBC does not currently provide records storage facilities for campus departments, nor does it provide other centralized services to help departments manage records.

The records management program is only publicized through the University Archives website and appropriate industry listservs. The only major stakeholder in the records management program at UBC is the University Archives; however, the records manager is constantly working with a multitude of departments to coordinate proper adherence to the records policy and to promote awareness of the records management program on campus. While the records management program is highly concerned with issues of appropriate retention - including security, and length of time and format of the records - the departments on campus are more concerned with storage, retrieval, and institutional memory - the first of which is the service most often requested on campus.

*Do you
accept this?
Do you think
there may be
more?*

UBC has a Sustainability Office on campus that currently supports University Policy #5 Sustainable Development, which works "...towards developing an environmentally responsible campus that is economically viable."⁴ The Office of Sustainability also supports the current UBCV's Graduate Student Strategy (2010-2015), which "...explores and exemplifies all aspects of

⁴ Mike Thayer, "Technical Guidelines-Governing Overview General Principles," The University of British Columbia, 12 Nov. 2010 <http://www.technicalguidelines.ubc.ca/technical/general_principles.html>.

While there is no established system policy as it relates to Archives, there is a policy for Records Management. The TAMU Records Manager that reports directly to Dr. Chapman is Ms. Meg Carpenter; whom represents the entirety of the Records Management staff for the university. Ms. Carpenter oversees the university's adherence to its campus-wide mandate for Records Management. The state of Texas requires all of its state agencies to have an active and on-going Records Management program.

TAMU is "...required to submit a records retention schedule to the Texas State Library and Archives Commission for certification, and to establish policies and procedures for the management of state records created, received, retained, used, and transmitted for both paper and electronic records." The Retention Schedule for TAMU is certified by the Texas State Library and Archives Commissions, and changes or alterations to this schedule are made based on recommendations by departments and individuals who use records on a daily basis. TAMU's Records Retention Schedule is aimed to fulfill requirements set forth by the following:

- Federal statutes, laws, regulations, and legal decisions
- State records management laws – 441.180 Preservation and Management of State Records and Other Historical Resources
- TAMU University System Regulations and Policies
- TAMU University Standard Administrative Procedures and Rules
- University Administration
- University colleges, departments, and centers
- Stakeholders of the University – faculty, staff, students, investors, donors, etc.

All rules that apply to paper records at the university are carried over to electronic records as well. Electronic mail created and used by university staff is valued based on its content, and to be considered a complete and accurate record must retain its appropriate metadata. The 'Electronic Records General Overview' section of the TAMU Records

Management website states that the "...key to effectively managing email is to get rid of the non-records and transitory information as quickly as possible, so that one is left with a small percentage to manage in an organized folder structure...", mirroring best practices for more traditional paper records. No campus-wide oversight or advisory committee exists, and this responsibility falls upon the individual university employees. The TAMU Records Center does not accept electronic records for storage due to potential hardware and software vulnerabilities. *- what are the vulnerabilities?*

Centralized services exist via the University Records Center to aid individual departments in the management of their records. Departmental Records Coordinators have been appointed to act as liaisons between their department and University Records Management. For instance, as stated in the 'Departmental Records Coordinators' section of the TAMU Records Management website, any "... boxes being sent to the Records Center for storage need to go through the coordinator to ensure that the Records Storage Form and the Records Destruction Form are completed correctly with enough information that a specific box could be required if necessary, that the box number system for the department is being followed, that the correct agency item number has been selected for the records, and that the proper retention has been assigned." A throng of specific records responsibilities have been assigned to many Business, Finance, Office, and Administrative Records Coordinators. For a full break-down of Departmental Records Coordinator duties and responsibilities please consult the complete survey located in the Appendix. Although interactions with Departmental Records Coordinators are formal, there is no direct relationship between Records Management and

university IT – aside from what Ms. Carpenter has developed on her own. Legal counsel is provided by the Office of General Counsel.

*What is the
purpose of
this?*

Training for staff and units on campus is provided in basic Records Management workshops in conjunction with the university's General Services Complex. An online training program called the 'Retention of State Records' has been developed and is available through 'HR Connect' via the university's Training menu on their website. While this class is only a requirement of employees with records responsibilities, it is available to all those interested. In addition, The Employee and Organization Development department has developed two online classes through the University's 'TrainTraq' program - 'File Management' and 'Fundamentals of Managing Departmental Records' - designed to help university employees meet defined core competencies. Lastly, the Texas State Library and Archives Commission also offer a free class online called 'State Records Retention Basics.'

When questioned about her relationship with the Office of Sustainability, Ms. Carpenter admitted that she had no knowledge of such a department; however, there is indeed a TAMU Office of Sustainability. Created in 2008, the Office of Sustainability has devised a 'Master Plan' intended to tackle issues of climate change, the purchasing of sustainable goods and services, optimization of energy use, sustainable food and dining, management of water resources, waste management, sustainable land use, use of green building practices, utilization of alternative transportation and fuels, improving social and economic factors, education and research, and management and fund support.⁶ As taken from their Facebook page, their mission is to "...educate about sustainability, to promote sustainable practices both on and off

⁶ TAMU Office of Sustainability, "Sustainability Master Plan for Texas A&M University", Texas A&M University, 12. Nov. 2010 <<http://sustainability.tamu.edu/LinkClick.aspx?fileticket=BK71d7MM7ck%3d&tabid=36>>.

campus, and to provide resources and support for people who wish to incorporate sustainable practices into their work and life.”⁷ Although TAMU does have an Office of Sustainability, it seems that the “left hand does not know what the right hand is doing” and Records Management is not involved in any effort to reduce the environmental impact of information management.

TAMU’s Records Management program is only publicized through their department website; however, Ms. Carpenter has been known to volunteer and has been called on several times to provide assistance with other departments. In her opinion – which is founded upon countless interactions with others university departments – Ms. Carpenter believes that the most important issues with Records Management at TAMU are the “... lack of compliance, lack of recognition...” and the fact that “... electronic records [are] out of control.” Ms. Carpenter also noted that she believes the most significant matter for other departments is efficiency, and that she finds herself receiving requests for the disposal of physical records far more than anything else.

Records Management: A Comparison of *ISO 15489* against UBC and TAMU

The International Organization for Standardization (ISO) is an organization that actively aims to provide direction on a vast array of records management issues through international standardization. While there are many topics covered by ISO, the particular standard that pertains to this assignment is *ISO 15489 Information and documentation—Records*

⁷ Texas A&M Sustainability, "Mission Statement," Texas A&M University, 12 Nov. 2010
<<http://www.facebook.com/pages/College-Station-TX/Texas-AM-Sustainability/140471500738>>.

Management. There are two (2) parts to *ISO 15489*; part one (1) "...provides guidance on managing records or originating organization, public or private, for internal and external clients..."⁸, while part two (2) is "...an implementation guide to *ISO 15489-1*"⁹. *ISO 15489* covers a variety of facets associated with records management including: terminology, regulatory environment, policy and responsibility, documenting records management processes, storage and handling, access, distributed management, disposition, monitoring and auditing, and training.

Terminology of Records Management

ISO 15489 defines records management as the "...field of management responsible for the efficient and systematic control of the creation, receipt, maintenance, use, and disposition of records, including processes for capturing and maintaining evidence of and information about the business activities and transactions in the form of records."¹⁰ *ISO 15489-1* suggests that a records management program should include: "...policies and standards... responsibilities and authorities... procedures and guidelines... a range of services relating to the management and use of records..." so as to "...integrat[e] records management into business systems and processes."¹¹ By adhering to these suggestions an organization should be able to create, capture, and manage reliable, authentic, and useable records.

⁸ International Organization for Standardization, "ISO/TC 15489-1: Information and documentation—Records Management—Part 1: General," (Geneva, Switzerland: International Organization for Standardization, 2006): 1.

⁹ International Organization for Standardization, "ISO/TR 15489-2: Information and documentation—Records Management—Part 2: Guidelines," (Geneva, Switzerland: International Organization for Standardization, 2006): 1.

¹⁰ "ISO/TC 15489-1": 3.

¹¹ "ISO/TC 15489-1": 4.

The definition of records management that TAMU provides on their website is taken from *ISO 15489* verbatim. TAMU goes on to say that a records management program includes: development of records retention schedules, management of filing and information retrieval systems in any format, ensuring adequate protection of records in any format that are vital, archival or confidential according to accepted archival and records management practices, economical and space-effective storage of active and inactive records, maintenance of public information records in any format in a manner to facilitate access by the public as required by Chapter 552 of the Texas Government Code.”¹² TAMU also uses the ISO definitions of authenticity, reliability, integrity, and usability. UBC defines the term as follows: “Records Management means efficient and systematic control of the creation, receipt, maintenance, use and disposition of Records used in the administration and operation of University activities.”¹³ No definitions were found that established the foundations of a good records management program or the characteristics of a record for UBC.

Regulatory Environment

ISO 15489 states that “...all organizations need to identify the regulatory environment that affects their activities and requirements to document their activities...” and that it “...consists of: statute and case laws, and regulations governing the sector-specific and general business environment, including laws and regulations relating specifically to records, archives, access, privacy, evidence, electronic commerce, data protection and information; mandatory

¹² Texas A&M University Libraries, “University Records Management”, Texas A&M University, 12 Nov. 2010 <<http://library.tamu.edu/services/additional-services/records-management>>.

¹³ University of British Columbia University Archives, “UBC Policy on Records Management,” 29 June 2010, The University of British Columbia, 12 Nov. 2010 <<http://www.universitycounsel.ubc.ca/files/2010/08/policy117.pdf>>.

standards of practice; voluntary codes of best practice; voluntary codes of conduct and ethics; identifiable expectations of the community about what is acceptable behavior of the specific sector or organization.”¹⁴

TAMU states on their website that since they are a state agency they are also required by law to have an “...active and on-going records management program”, and as such they are also “...required to submit a records retention schedule to the Texas State Library and Archives Commission for certification, and to establish policies and procedures for the management of state records created, received, retained, used, and transmitted for both paper and electronic records.”¹⁵ Some of the requirements the TAMU records retention schedule meets are: federal statutes, laws, regulations, and legal decisions, the Texas records management law (441.180 Preservation and Management of State Records and Other Historical Resources), TAMU System regulations and policies, TAMU administrative procedures and rules, stakeholders of TAMU, and “...recognized industry practice”¹⁶.

UBC’s policies, legislative frameworks, and standards are laid out in their records management policy. UBC adheres to: the aforementioned UBC Policy #117—Records Management, records retention schedules, the *UBC Records Management Manual*, provincial and federal legislation, *ISO 15489* and *CAN/CGSB 72.34-2005*, a standard of the Canadian Government Standards Board entitled *Electronic Records as Documentary Evidence*. UBC adds that “It is likely that such standards will adapt and change as record keeping needs change and

¹⁴ ISO/TC 15489-1”: 5.

¹⁵ Texas A&M University Libraries.

¹⁶ Texas A&M University Libraries.

new technology is implemented. UBC will implement these and future standards as appropriate, and as required to meet University Records Management Policy requirements.”¹⁷

Policies and Responsibilities

ISO 15489 states that... “The objective of the policy should be the creation and management of authentic, reliable and useable records, capable of supporting business functions and activities for as long as they are required.”¹⁸ TAMU uses the Generally Accepted Recordkeeping Principles (GARP) to guide their records management program. TAMU lists the eight (8) principles of GARP (accountability, integrity, protection, compliance, availability, retention, disposition, transparency) on their website and states that they support and incorporate these guidelines into their records management program. UBC states that the purposes of their policy is “...to ensure that the University’s Records are created, managed, retained, and disposed of in an effective and efficient manner, to facilitate the efficient management of the University’s Records through the development of a coordinated institutional Records Management program, to ensure preservation of the University’s records of permanent value, and to support both protection of privacy and freedom of information services throughout the University.”¹⁹

ISO 15489 states that... “Organizations should ensure that the policy is communicated and implemented at all levels in the organization. RM responsibilities and authorities should be defined and assigned and promulgated throughout the organization so that, where a specific

¹⁷ University of British Columbia University Archives, “Records Management Manual,” 29 June 2010, The University of British Columbia, 12 Nov. 2010: 6 < http://www.library.ubc.ca/archives/manuals/rm_manual.pdf >.

¹⁸ ISO/TC 15489-1”: 5.

¹⁹ University of British Columbia University Archives, “UBC Policy on Records Management”.

need to create and capture records is identified, it should be clear who is responsible for taking the necessary action.”²⁰ UBC fulfills this requirement by clearly stating in their records management policy that “This Policy applies to all departments and administrative units of the University, to all records, and to all University officers and employees, who create, receive or maintain records in the course of their duties on behalf of the University.”²¹ TAMU fulfills this requirement quite uniquely. They have introduced a ‘records coordinator’ to facilitate interactions between the given department and the TAMU records manager. Their responsibilities are split into four (4) broad categories: “Serve as the official representative of the University Records Management program in their department...Coordinate a departmental Records Inventory...Coordinate Departmental Records Retention...Coordinate records destruction with University Records Management”.²²

ISO 15489 states that... “This policy should be adopted and endorsed at the highest decision-making level and promulgated throughout the organization.” For TAMU, this is not an issue - as previously mentioned, Texas State Law mandates that each state agency has an on-going and active records management program. To reinforce this requirement TAMU has posted on their website a warning to all employees that... “Texas Penal Code 37.10, Tampering with Governmental Records, states the penalty for destroying governmental records is a Class A misdemeanor, but, depending on circumstances, could be as severe as a 2nd degree felony.”²³ At UBC there are no such penalties; however, the records management office does remind employees that... “All Records are the property of the University and subject to its overall

²⁰ ISO/TC 15489-1”: 5.

²¹ University of British Columbia University Archives, “UBC Policy on Records Management”.

²² Texas A&M University Libraries.

²³ Texas A&M University Libraries.

control. The University will manage all Records subject to applicable federal and provincial laws and university policies.”²⁴

ISO 15489 also states that responsibility for compliance itself should be assigned. At TAMU it is the records managers that are ultimately held responsible for ensuring compliance with all regulations, rules, laws, etc. Although, both universities agree that it is the responsibility of the individual who creates the record to ensure that the records are maintained in a secure environment. In addition, at UBC the “operational responsibility” of the department’s records management belongs to the administrative unit heads.²⁵

Implementation of a Records System

ISO states that all records management processes should be thoroughly documented. TAMU requires that all employees gain approval from the TAMU records manager, as that individual is ultimately held responsible for the destruction of records. The TAMU records *definition of a record* manager includes paper, as well as electronic records, ~~in their definition of a record~~. All employees of TAMU are required to “...send a completed Records Destruction form to Records Management for approval before destroying official University records maintained in any format.”²⁶

ISO also has many guidelines concerning the storage and handling, access, and distributed management of records. ISO states that as a part of distributed management, a records system “...should be capable of supporting alternative options for the location of

²⁴ University of British Columbia University Archives, “UBC Policy on Records Management”.

²⁵ University of British Columbia University Archives, “UBC Policy on Records Management”.

²⁶ Texas A&M University Libraries.

records.”²⁷ TAMU fulfills this requirement in the form of the University’s Record Center. For example, any department on campus may use the Records Center or its shredding services free of charge. TAMU departments are not required to use the Records Center but they are required to adhere to the TAMU System Records Retention Schedule and all destruction of records must still be approved by the records manager as mentioned above.

UBC fulfills this requirement twofold. UBC has a Records Center and they also have instilled a Business Continuity and Disaster Recovery Plan. ~~Through this plan~~ UBC safeguards their records through: off-site storage, physical, technical and procedural means.²⁸ UBC also asks that any department that feels that they have records vital to business continuity should consult the archives for advice on how to install their own plan. These types of records include “...records [that] detail the rights and obligations of the University, its personnel, and students.”²⁹

Regarding storage, TAMU requires that each box sent to the Records Center be assigned with a unique number, but does not specify on their website whether or not it is the responsibility of the records manager or the department sending the box to see to this. The department, however, is required to record a detailed description of the contents of the box in the event that the department needs to retrieve documents. TAMU’s Record Center is currently only equipped for the storage of paper media. The only rules regarding storage of records from UBC are that departments must “...contact the University Archivist and the Office

²⁷ Texas A&M University Libraries.

²⁸ University of British Columbia University Archives, “Records Management Manual”: 12.

²⁹ University of British Columbia University Archives, “Records Management Manual”: 12.

of the University Counsel prior to entering into any arrangements for storage of University Records...outside of Canada.”³⁰

Regarding security, TAMU requires that only authorized personnel can request boxes or documents which are to be taken from the Records Center. In addition, no unauthorized personnel are allowed to open boxes in the Records Center. Security measures are taken to assure university departments of the safety of their records: “All employees of University Records Management sign a non-disclosure agreement and must pass security clearance. The Records Center itself is a secure area with security cameras, motion detectors, and an alarm system.”³¹ TAMU will also have any records pulled and waiting if the department has the foresight to make requests ahead of time.

Like TAMU, UBC also requires that only authorized personnel are able to access boxes or documents. UBC is required by Canadian law to restrict certain types of information, and these include: “University Records containing accounting and financial information, including supporting source documents...and University Records containing personally identifiable information...”³²

Records Disposition

Both universities adhere to the notion that a record goes through a “life cycle” including active use, semi-active use, inactive storage, and disposition. Both universities highlight the belief that by adhering to a retention schedule the disposition of records will be achieved

³⁰ University of British Columbia University Archives, “University Archives and Records Management Advisory Committee 1991-2004”.

³¹ Texas A&M University Libraries.

³² University of British Columbia University Archives, “Records Management Manual”: 13-14.

routinely, not sporadically. Both universities have determined that a retention schedule consists of records and records series, and a definition of how long each shall be retained in the semi-active use stage. Both universities agree that retention schedules will help maintain the credibility of the organization in the off chance a legal problem was to arise.

TAMU defines a retention schedule as "...a listing of records found in the workplace, along with their agreed retention periods and disposition methods."³³ TAMU's retention schedule is certified by the Texas State Library and Archives Commission.³⁴ Anyone can, and is welcomed to, suggest changes or additions to the schedule. TAMU suggests that drafts and copies should be "...destroyed as soon as they are no longer needed..." and states that as a whole only three (3) to five (5) percent a department's records will be saved for "archival or historical value."³⁵

UBC determines their retention schedule based upon: "federal and provincial legislative requirements, administrative and operational requirements of the unit and the University and the historical value of University records as determined by the University Archives." UBC shares a similar approach to the value of records as TAMU. UBC states that all records are different, and the information within them is not created equal. This is evidenced in the following statement from the *UBC Records Management Manual*: "Although some records are vital and need to be protected... not all information needs to be retained long term. In fact, a great deal of the information retained at UBC is retained unnecessarily, and is of no value."³⁶

³³ Texas A&M University Libraries.

³⁴ Texas A&M University Libraries.

³⁵ Texas A&M University Libraries.

³⁶ University of British Columbia University Archives, "Records Management Manual": 5.

With regard to destruction, TAMU requests basic information from the department concerning the documents in question if they wish to use the TAMU Records Center for destruction purposes: a specific box dimension and maximum weight, complete with the records destruction form (necessary for documenting the process), only “records that actually require secure disposal, as opposed to recycling”, no non-paper media, etc.³⁷ Any non-paper media must be directed to a commercial vendor. UBC only asks that “...particular care must be taken when disposing of electronic storage media, such as hard drives, tapes, CDs, DVDs, and other magnetic or optical storage media, since they may contain confidential University Records.” There is no further mention of rules regarding how employees at UBC may choose to dispose of their records.

Monitoring and Auditing

TAMU clearly states on their website that they participate in a records program assessment and proudly announce that “...records assessment strengthens the foundation of the program.”³⁸ They state that this is achieved in six (6) ways: “ensures that procedures and processes are being followed...ensures that the program is serving the University efficiently and effectively...demonstrates a commitment to the importance of the program...makes the program accountable...minimizes risks associated with not complying with the records program...ensures that records are easily identifiable, protected, secure, and retrievable.”³⁹ UBC does not mention a records program assessment or any type of monitoring/auditing.

³⁷ Texas A&M University Libraries.

³⁸ Texas A&M University Libraries.

³⁹ Texas A&M University Libraries.

Training

Through the Texas State Library and Archives Commission TAMU offers a free online class called State Records Retention Basics. “This basic class briefly covers state requirements for records programs in state agencies, retention schedules, microfilming, and electronic records.”⁴⁰ TAMU Records Center also offers individual or departmental training and is willing to customize the training session to compliment specific needs. Examples of such training include “...records management basics, using the campus records center, using the retention schedule, new employee training, new records coordinator training, setting up a filing system, and managing paper and electronic records.”⁴¹ UBC conducts training sessions with individual departments and participates in presentations with the Freedom of Information Officer. These training presentations are open to all university staff and faculty.

Reflection

TAMU’s Records Management Assessment

As a reflective exercise, we thought it fair to first assess TAMU’s Records Management program against ARMA’s Maturity Model. TAMU clearly states on their website that they adhere to the GARP Principle, so we decided to put them to the test. For the purposes of this assessment, mandated state law is analogous to senior management. As the organization’s senior management and its governing board place abundant emphasis on the significance of

⁴⁰ Texas A&M University Libraries.

⁴¹ Texas A&M University Libraries.

the program, we believe this demonstrates a Level Five (5) evaluation for 'Accountability'. The TAMU Records Management program is responsible for adhering to state law and this goal is currently being met. TAMU scored a Level Four (4) for 'Transparency', as they monitor compliance on a regular basis and transparency itself is emphasized in their Records Management training. A Level Three (3) was given for 'Integrity' as they have a formal process in place to ensure that the required level of authenticity and the chain of custody can be applied to its systems and processes. TAMU has also defined university specific goals related to integrity. A Level Five (5) evaluation was given on 'Protection', showing that senior management placed a great value on the protection of information, and TAMU also conducts regular audits to implement improvements. TAMU scored a Level Five (5) on 'Compliance' and 'Availability', which is also recognized at senior management levels - again, audits are regularly conducted to foster improvements and assists employees with discovery regulations. TAMU scored a Level Five (5) on 'Retention' – another element supported by senior management. TAMU is aware that not only are official records important, but others are as well, and all information is retained for the appropriate time period. Finally, TAMU scored a Level Four (4) on 'Disposition', whereas all disposition procedures are understood by the organization and apply across the enterprise. The process for suspending disposition due to legal hold is defined, understood, and used consistently across the organization. Furthermore, policies regarding the removal of electronic information are understood. All in all, we assess TAMU with a score of thirty-six out of forty (36/40), or ninety percent (90%), and based off of the research we have performed we believe awarding TAMU with an 'A' seems appropriate. Their Records

Management program is solid, with only a few areas for improvement, and most of these weaknesses are linked to technological aspects.

The Plight of Records Management

The burgeoning technological aspects associated with the profession of Records Management are inadvertently operating as a hindrance on Records Management programs themselves. Both universities in question are having significant issues with regard to the implementation of technology to their respective programs and electronic records management proves to be a contentious issue. No real electronic records management process has been implemented at UBC, and only a mirrored approach of traditional records management has been imposed on electronic records at TAMU. Electronic records aside, even the maintenance of traditional records at UBC has thus far been insufficient. As UBC Records Manager Mr. Alan Doyle mentioned, UBC is a university with over a one hundred (100) year history – yet their first Records Manager was hired less than a decade ago. Not only is this indicative of the lack of emphasis that Records Management commands as an indispensable function, but also most likely as a consequence of a simple lack of funding. Funding most certainly proves to be a considerable factor for both universities. To add insult to injury, technology does not come cheap. Technology is very expensive, and sustaining it is even more costly. Also related to a lack of funding is the resultant lack of staffing. TAMU does not appear to be subject to conflict created through independent faculties (i.e. different drivers), since Records Management is mandated by state law, and the size of the enterprise for TAMU

is no issue; however, this is not the case for UBC as there is no Records Management setting mandated by an equivalent Provincial Law.

In summation, it unfortunately appears that unless a Federal law is prodding us in the back, Records Management will most likely never garner the attention it deserves – and like so many other circumstances, until people are disadvantageously affected by the consequences of not having a properly implemented Records Management program, many will not care. Also associated with the lackluster appeal Records Management draws is the lack of an established ‘champion.’ As stated in Richard J. Cox’s *7 Paths to Developing or Sustaining RIM Programs*, “...it is obvious that for RIM programs to continue to have support within organizations, they must work to gain the championing of additional effective leaders and advocates within these organizations.”⁴² Furthermore, deeper issues related to sustainability will continue to take second seat as long as the core foundations of Records Management are floundering. The greatest adversity to UBC Records Management is the lack of attention it garners – nurturing a decentralized setting with no champion, rejecting all attempts at unification.

The Assignment

We feel that this assignment helped us to gain insight on the shaky framework of Records Management hidden beneath the thin veneer of bureaucracy. Like many other functions of an enterprise, it is mired by lack of funding, lack of staff, and lack of support. While

⁴² Richard J. Cox, "7 Paths to Developing or Sustaining RIM Programs," (The Information Management Journal, March/April 2006): 52

this assignment granted us with an internal view of the inner workings of Records Management, we believe the very means in which the survey was delivered lead to fragmentary results. Communication via email provided answers, yet they were quite brief. Were we able to have an in-depth conversation with our interviewee over the phone, we believe more substantial and particular information could have been learned.

Appendix

The Records Management Challenge – A Community-Based Learning Opportunity Survey

Prior to administering the following survey to Ms. Meg Carpenter of TAMU, all questions that could be answered by perusing TAMU's Records Management website were answered and may be viewed below. The remaining questions we administered via email to Ms. Carpenter via email on October 9th, 2010. Ms. Carpenter's response and the answers it contained were received on November 12th, 2010. The answers within quotes represent Ms. Carpenter's response verbatim.

1. Is your institution state-supported or private?
 - State-supported
2. What is the size of your institution? (Students, Faculty and Staff)
 - "50,000 students, 3,000 faculty, maybe 5,000 staff – that is just the main A&M campus."
3. Does your institution have an archivist?
 - Dr. David Chapman, University Archivist
4. To whom does he report?
 - "Dr. Chapman reports to the Dean of the Library."
5. How many employee (Full time employees) constitute Archives staff? How many professionals? How many clerical?

- “1 archivist (soon to retire), 1 assistant archivist, 1 lecturer – there are probably 10 staff people and an additional 5 faculty in Cushing Library, but Cushing is a combination of archives and special collections, so it is hard to say specifically that they work for archives.”
6. If your institution does not have an archivist, who manages campus record deemed archival?
 - They have an archivist
 7. Is there a policy related to Archives? Origin of the policy? (Is it university, library, departmental)
 - “Not that I am aware of. I believe that there is a collection policy for special collections. There is an A&M System policy for records management however.”
 8. Does your institution have a records manager?
 - Meg Carpenter, CRM, ERM
 9. To whom does she report?
 - “I report to Dr. Chapman.”
 10. How many employees (Full time employees) constitute Records Management staff? How many professionals? How many clerical?
 - “Myself as Records Manager.”
 11. If your institution does not have a records manager, how does your institution manage active and semi-active records?
 - They have a records manager
 12. Is there a campus-wide mandate for records management?
 - Texas A&M University, as part of a state agency, is required to have an active and on-going records management program. As a state agency, The Texas A&M University System is required to submit a records retention schedule to the Texas State Library and Archives Commission for certification, and to establish policies and procedures for the management of state records created, received, retained, used, and transmitted for both paper and electronic records. Why? Records managers are responsible for ensuring compliance with state and federal laws. Texas A&M University is required by state law to have an active and on-going records management program. The administrative agency in charge of state records is the State and Local Records Division of the Texas State Library and Archives Commission.
 - Records Retention Schedule is designed to meet the requirements of the following:
 - Federal statutes, laws, regulations, and legal decisions
 - State records management laws - 441.180 Preservation and Management of State Records and Other Historical Resources - Please see State Agency Bulletin #3 Records Retention Scheduling Rules http://www.tsl.state.tx.us/slr/recordspubs/bulletin3_2007_09.pdf for a complete copy of this law
 - Texas A&M University System Regulations and Policies
 - Texas A&M University Standard Administrative Procedures and Rules
 - University Administration
 - University colleges, departments, and centers

- Stakeholders of the University – faculty, staff, students, investors, donors, etc.
 - The Retention Schedule used by the University is a listing of records and records series commonly found in the workplace and the minimum length of time these items must be retained in order to comply with state or federal laws, statutes, judicial rulings, TAMU System rules, or recognized industry practice.
13. Is there a campus-wide mandate for e-records management?
- All the rules for paper records apply to electronic records as well. Electronic records should be created and stored in electronic files just as paper records are placed into filing cabinets. Careful consideration and planning is needed in the grouping and naming of these files. A document maintained in electronic format may be a convenience copy if the record copy is in another format, such as paper or microfilm. If the record copy in one format is destroyed, and the electronic information has not been destroyed, then the electronic file becomes the record copy. For this reason, it is very important to delete electronic files according to the Records Retention Schedule. Convenience copies should be kept only as long as needed and no longer than the record copy. Conversely, in many cases the electronic record is the official copy and paper is for convenience.
 - The Texas State Library Archives does not accept electronic records because of the potential for problems with the hardware and software dependability and stability and questions about the ability to access the information over the long term. The Texas State Library recommends that any record with a retention period of over 10 years be in paper or microfilm format. Other sources recommend establishing a migration plan for records requiring retention of over 3 years, due to the rapidly changing hardware and software standards.
 - The Texas A&M System regulation 61.99.01 Retention of State Records (<http://tamus.edu/offices/policy/policies/pdf/61-99-01.pdf>) has several sections that apply directly to the management of electronic records. The definition of a state record is media transparent. State records, regardless of format, must be listed on the retention schedule and cannot be destroyed without prior approval from the University Records Officer.
 - The University provides computers, electronic mail, and Internet connection to employees to use in the course of performing their jobs. Personal use is expected to be incidental, and not interfere with work. The University reserves the right to monitor computer use, review employee files and e-mail, and to limit or restrict access to computer usage. Electronic files and e-mail are subject to the Texas Open Records Act and to discovery in the event of litigation.
 - For more information on the rules and regulations regarding electronic resources, see:
 - TAMU Rules for Responsible Computing
 - Texas Administrative Code Standards and Procedures for Management of Electronic Records, Title 13, Part 1, Chapter 6, Subchapter C, Rule 6.94

- Texas State Library, State Agency Bulletin #1, Electronic Records Standards and Procedures

http://www.tsl.state.tx.us/slr/recordspubs/bulletin1_nov2005.pdf

- Is Email a record? That depends. Email is not a record type or a series. It is a means of conveying information or a format. Its retention is based on the content of the message. If the email message meets the criteria of a University record, it must be managed with the same diligence as one would handle a more "traditional" record. The use of electronic mail has assumed an increasingly important role in the day-to-day communications of all university personnel. The use of e-mail in the course of business carries with it the responsibility to manage these communications as records. For a complete and accurate record, an electronic mail system must retain metadata (the address of the sender and recipient(s), date and time of transmission, and confirmation of receipt), as well as the actual message content. The key to effectively managing email is to get rid of the non-records and transitory information as quickly as possible, so that one is left with a small percentage to manage in an organized folder structure.
14. Is there a campus-wide oversight/advisory committee? If so who is involved?
 - "No."
 15. Is there dedicated budget for records management?
 - "Yes."
 16. Who controls the budget for records management?
 - "The Dean of the Library."
 17. How much is the budget?
 - "My salary, supplies, 12 hours/week of student worker time, and shredding – combined is about \$70,000."
 18. Does your institution provide records storage facilities for campus units?
 - University Records Center
 19. Does your institution have other centralized services to help departments manage records?
 - Departmental Records Coordinators
 - The records coordinator is the contact point between a department and University Records Management. Any boxes being sent to the Records Center for storage need to go through the coordinator to ensure that the Records Storage Form and the Records Destruction Form are completed correctly with enough information that a specific box could be requested if necessary, that the box numbering system for the department is being followed, that the correct agency item number has been selected for the records, and that the proper retention has been assigned. All departmental destruction records and destruction authorizations have to be signed by the coordinator as well. This is an important position within a department, requiring a full-time employee who has familiarity with all the records created and received by the department. While a large department may have sub-coordinators for specific areas, or assistants, such as a new employee or student workers, to help the coordinator in packing boxes, calling to arrange pickups or deliveries, or being present when URM comes to pick up boxes, the records

coordinator should still have an overall responsibility for departmental records. TAMU Employee Services has added records responsibilities to many of the staff positions on the Business, Finance, Office, and Administrative career ladders. Department heads should use the Records Coordinator Designation Form to name a records coordinator.

- Duties and Responsibilities
 - Serve as the official representative of the University Records Management program in their department:
 - a. Attend training sessions conducted by University Records Management
 - b. Coordinate departmental records management workshops conducted by the coordinator or URM staff
 - c. Be responsible for completion and submission of all records management forms to URM and retaining the departmental copy of these forms
 - d. Notify URM of any organizational changes in the department that affect URM
 - e. Notify URM of any potential, pending or on-going litigation, claim, negotiation, audit, open records request, administrative review, or any other action that relates to departmental records
 - f. Distribute any records management information within the department as necessary
 - Coordinate a departmental Records Inventory
 - a. Identify records and records series held in the department regardless of format
 - b. Identify official records and convenience copies held in the department
 - c. Identify vital records of the department
 - d. Identify archival records of the department
 - Coordinate Departmental Records Retention
 - a. Provide guidance to departmental personnel on records-related issues and manage files in the office
 - b. Become familiar with the TAMU System Records Retention Schedule
 - c. Contact URM about recommendations for adding records to or changing records on the TAMU System Records Retention Schedule
 - d. Make sure boxes are transferred to the University Records Center in a timely manner
 - e. Arrange for pick-up or delivery of boxes
 - f. Make sure the Records Storage form is completed correctly
 - g. Make requests for viewing boxes at the University Records Center or in the department

- Coordinate records destruction with University Records Management
 - a. Review the Destruction Authorization form when it is sent to the department, and obtain the necessary signatures for approval
 - b. Be responsible for completing the Records Destruction form for boxes being sent to the University Records Center for destruction
 - c. Be responsible for in-department disposal of official records by completing the Records
 - d. Destruction form and sending it to the records manager for approval
 - e. Be responsible for the destruction of departmental convenience copies either in the department or by preparing the Records Destruction form and sending the records to the University Records Center
- 20. Who are the major stakeholders in the records management program?
 - Faculty, staff, students, investors, donors
- 21. Who was included in developing the records management policies and procedures?
 - The Retention Schedule for Texas A&M University System is certified by the Texas State Library and Archives Commission. Changes or additions to the basic schedule are recommended by the departments and individuals who use the records on a daily basis.
- 22. What is your relationship with IT?
 - "Only what I have developed on my own. It has been getting better as more records go electronic."
- 23. What is your relationship with legal counsel?
 - "Office of General Counsel is at the A&M System Offices. The Records Management Officer for the System is a lawyer in the OGC."
- 24. If your institution does not have a formal e-records management program, is there one in the planning stages?
 - They have one.
- 25. Do you conduct training for staff/units on campus?
 - We offer a basic records management workshop in conjunction with A&M Employee and Organizational Development in the General Services Complex. See the training calendar at <http://training.tamu.edu/index.php> to sign up for classes. The class is free to TAMU employees.
 - The TAMU System has developed an online training program called Retention of State Records (#11015). The class is available through HR Connect on the Training menu. Try it out! Some people with records responsibilities on campus will be required to take this class, but the class is available to anyone. The online training covers the basics of state records laws and the TAMU System regulation for records management. As records manager, I have completed the training necessary to assign persons with records responsibilities to the online class. The second group has been assigned, and I am ready to make assignments for additional groups. I haven't come

up with a penalty for not taking the class if you are lucky enough to be among those selected, but it may be that I will come to your office for a personal training session! So take that online class!

- Employee & Organizational Development has developed two new online classes available through TrainTraq. They are File Management (#2111142) and Fundamentals of Managing Departmental Records (#2111143). These basic classes are designed to help university employees meet the core competencies.
 - The Texas State Library and Archives Commission now offers an online class called State Records Retention Basics. Registration is required, but the class is free. Go to their web page at <http://www.tsl.state.tx.us/apps/slrn/training>. This basic class briefly covers state requirements for records programs in state agencies, retention schedules, microfilming, and electronic records.
 - We will continue to offer individualized, small group, and departmental training. We can customize a workshop to answer your specific questions and address your records management needs. Possible topics include records management basics, using the campus records center, using the retention schedule, new employee training, new records coordinator training, setting up a filing system, and managing paper and electronic records. Please contact us to arrange to come to the Records Center or for us to visit your department.
26. Do you publicize your program? (If so, how and to whom?)
- Website
 - “Not really. I have volunteered and been called on several times to provide help to other members of the System.”
27. What do you consider to be the most important issues in records management?
- “Lack of compliance, lack of recognition, electronic records out of control.”
28. What are the most important issues to departments/units?
- “Efficiency.”
29. For which services do you receive the most request from departments/units?
- “Disposal of paper records.”
30. What is your relationship with the Office of Sustainability?
- We do not have this. What might that translate into in the US?
31. Is there a Sustainability Office/Department at your institution?
- Yes, Texas A&M Office of Sustainability
32. What is your relationship with the Office of Sustainability?
- “We do not have this. What might that translate into in the US?”
33. Is there a Sustainability Policy at your institution? Origin of the policy? (Is it university, library, departmental, other?)
- Website: <http://sustainability.tamu.edu/>
 - The Office of Sustainability was created in March 2008 and is currently assimilating information about ongoing campus sustainability initiatives. This policy is university wide.
 - The Master Plan addresses 12 strategic imperatives known as the Sustainability 12:
 - Management of climate change
 - Purchasing of sustainable goods and services

- Optimization of energy use
 - Sustainable food and dining
 - Management of water resources
 - Waste management
 - Sustainable land use
 - Use of green building practices
 - Utilization of alternative transportation and fuels
 - Improving social and economic factors
 - Education and research
 - Management and funding support
 - Off their FB page: Our mission is to educate about sustainability, to promote sustainable practices both on and off campus, and to provide resources and support for people who wish to incorporate sustainable practices into their work and life.
34. Does the Sustainability Office produce statistics related to the management of information on campus?
- "Don't know."
35. Is the Records Management Office or Archives currently involved in any efforts to reduce environmental impact of information management? Please describe these efforts.
- "No."