

2018

Records Disposition without Retention Schedules or, Records Management Inaction: A Legacy

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RECORDS DISPOSITION WITHOUT RETENTION SCHEDULES

OR, RECORDS MANAGEMENT INACTION: A LEGACY



Karen Walton Morse, 4 May 2018

NAGARA Spring Online Forum

IN ACTION

Phrase

- In operation; working.

INACTION

Noun

- Lack of action where some is expected or appropriate.

[Oxford Living Dictionaries](#), Retrieved 16 April 2018





SOME CONTEXT



KAREN WALTON MORSE

Director of Distinctive* Collections,
University of Rhode Island



* a.k.a./f.k.a. Special



OMNIPRESENT DUSTY ARCHIVIST

[Techmaza](#), original source unknown

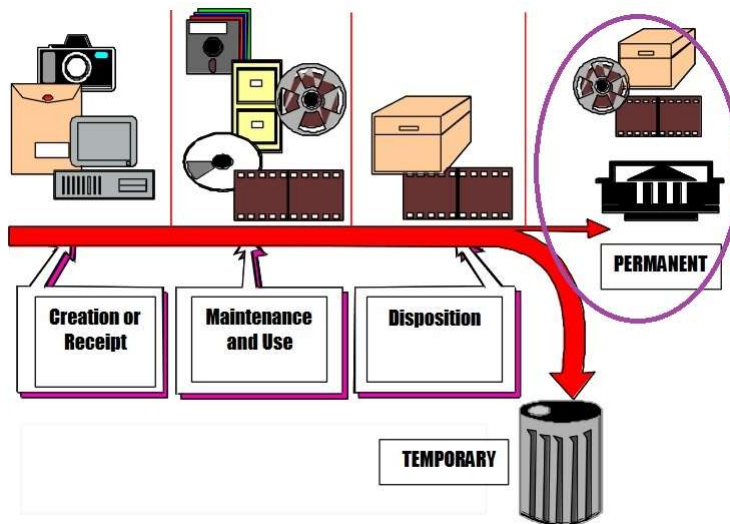


Exhibit 2.0., [FEA Records Management Profile, v.1](#) (2015), emphasis mine



PUBLIC R1 UNIVERSITY, 2003-2011

My role

- Processing archivist

State of Records Management

- Retention schedules, 1977 (updated 2010)
- State Freedom of Information Law
- Records management officer under administration



NOT-FOR-PROFIT MUSEUM, 2011-2017

My role

Manager of Library and Archival Services

- head of museum library
- museum archivist
- *de facto* records administrator

State of Records Management

- Document retention and destruction policy adopted in 2010 (updated c. 2014)



PUBLIC R2 UNIVERSITY, 2017-

My role

Director of Distinctive Collections

- head of special collections
- *de facto* university archivist

State of Records Management

- General Records Schedules
- No university records manager; no unit officially responsible for RM compliance
- State Access to Public Records Act –
 - [Public Records Request Guidelines](#) (Sept 2015)
 - Requests attn. “Public Records Official”

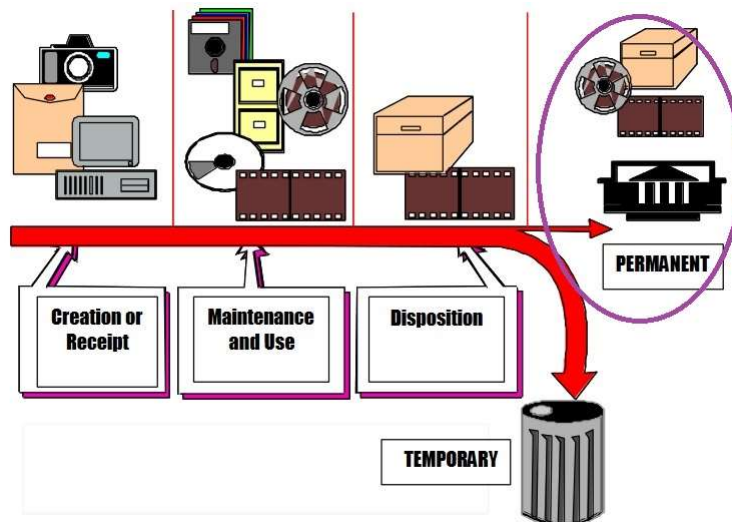


Exhibit 2.0., [FEA Records Management Profile, v.1](#) (2015), emphasis mine





[Why?](#), Marco / Zak (CC BY-ND 2.0)



UNIV. ARCHIVES MISSION

1. Collect, maintain, organize, and make available those university records of permanent, administrative, legal, fiscal, and historical value.
2. Provide facilities for the retention, preservation, servicing, and research of such records.
3. Provide information services to assist in the university's administration and operation.
4. Serve as a research center for the study of the university's history and the history of higher education.
5. Promote knowledge and understanding of the origins, programs, and goals of the university.

last updated 2014, emphasis mine



UNIVERSITY ARCHIVES RECORDS AUTHORITY STATEMENT, N.D.

- The University [...], recognizing the need for a formal archival policy to ensure the preservation and availability for historical purposes of the official records of the university, hereby adopts the following policy and procedure [...]
- [Records] in university offices may not be destroyed or placed in storage without the approval of the officer supervising the department [...] and the University Archivist.
- The officer in charge of each administrative or academic office, in consultation with the University Archivist and **in compliance with state and federal laws**, will be responsible for determining how long records are to be retained under the direct control of the office prior to disposition (destruction or transfer to the Archives).

Leads into the University Archives
Mission Statement

n.b. no guidance about disposition

snippets, emphasis mine

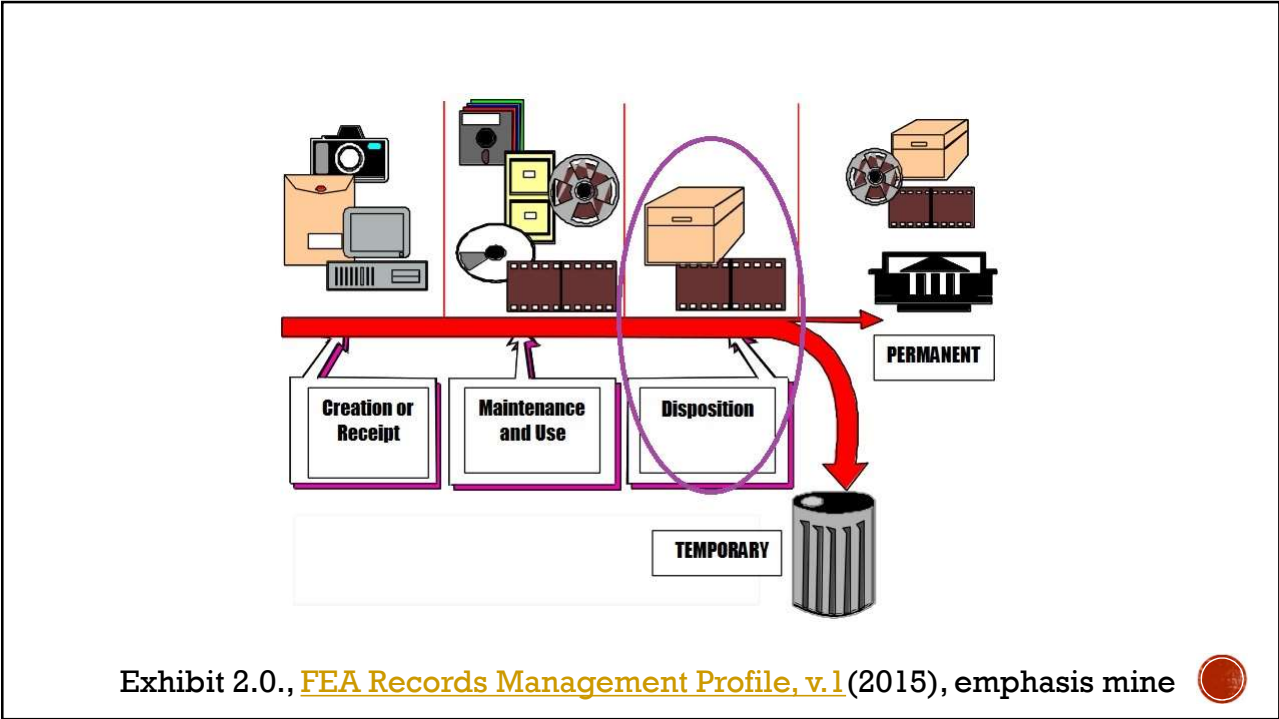


POLICY REGARDING ACCEPTING MATERIALS INTO THE ARCHIVES

- **In the absence of a Records Manager**, the decision to preserve the records for administrative, legal and fiscal purposes is the responsibility of the university's permanent officers and administrators in consultation with the University Archivist.
- **The decision to collect and preserve records of historical value is the responsibility of the University Archivist.** The purpose of collecting such records is to document the development and growth of the university its functions of teaching and research its role in the community at large the activities of its faculty, students, staff and alumni and the development of its grounds. Priority is given to those records that reflect the activities of University officers and committees which formulate or approve university policy as well as faculty and administrative involvement in these activities.

last updated 2014, emphasis mine





RETROSPECTIVE APPRAISAL

TOWARD A FINAL, FINAL DISPOSITION



GUIDELINES FOR REAPPRAISAL AND DEACCESSIONING

- Does the collection fit within the collecting policy?
- How often is it used?
- Would this collection and/or potential users be better served elsewhere?
- What condition is the collection in?
- What are the preservation/maintenance costs?
- What is the potential research value?
- Is the collection comprised of formats not generally collected by the repository, such as newspaper clippings, magazines, or artifacts?
- Does the collection contain reproductions or copies of materials that are located elsewhere?
- Is the collection or series restricted under federal or state law?
If so, can portions of it be opened to researchers?
- Must the record series be kept for a certain period of time for legal or fiscal reasons?
- Does it retain any other value (e.g. historical, administrative, research, etc.)?

Society of American Archivists, 2012 (emphasis mine)





UNIVERSITY AS A STATE AGENCY

AGENCIES' RECORDKEEPING RESPONSIBILITIES

- 38-1-10. Disposal of records.— No public official may mutilate, destroy, sell, loan, or otherwise dispose of any public record without the consent of the public records administration program of the secretary of state.

Public record(s):

all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, magnetic or other tapes, electronic data processing records, computer stored data [...] or other material regardless of physical form or characteristics made or received pursuant to law or ordinance or in connection with the official business by any agency.

(§38-2-2 (4)(i))

Extracts from RI General Laws (retrieved 1 May 2018)



Rhode Island Department of State
Nellie M. Gorbea
Secretary of State

HOME / FREQUENT FILERS / RECORDS MANAGEMENT / STATE AGENCIES RECORDS SCHEDULE

State Agencies Records Schedule

Agency specific retention schedules list and describe the records that are unique to a particular state agency and which they create or receive in the course of conducting business. These schedules indicate the minimum amount of time an agency must keep the records. The retention periods reflect the legal, administrative, fiscal, informational, and historical value of the records.

Agencies must submit a [Certificate of Records Destruction](#) to the State Archives/Public Records Administration before any records destruction takes place (§38-1-10, §38-3-6(j) and §42-8.1-10). Certificates of Records Destruction authorize the disposal of records and act as the legal replacement for the actual records subsequently destroyed.

Select from an Alphabetical Index of state agencies with records retention schedules:

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Search

Entities matching your search:

- University of Rhode Island

File Open Meetings

File Rules & Regulations

Register and File Lobbying Reports

Update RIGOM

File Municipal Ordinances

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Screenshot: RI State Agencies Records Schedules search (ret. 24 Apr 2018), emphasis mine

Rhode Island Department of State
Nellie M. Gorbea
Secretary of State

HOME / FREQUENT FILERS / RECORDS MANAGEMENT / STATE AGENCIES RECORDS SCHEDULE

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Screenshot: RI State Agencies Records Schedules search (ret. 24 Apr 2018), emphasis mine

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Select from an Alphabetical Index of state agencies with records retention schedules:

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

Schedules matching your search:

- University of Rhode Island Police and Security Department

File Open Meetings 

File Rules & Regulation 

Register and File Lobbying Reports 

Update RIGOM 

File Municipal Ordinances 

File State Lease 

Government Records Management 



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Screenshot: RI State Agencies Records Schedules search (ret. 24 Apr 2018), emphasis mine 

RECORDS DISPOSITION WITHOUT RETENTION SCHEDULES

TAKE 2





INVOLVE THE PROFESSIONALS

Records retention schedules for Higher Education now forthcoming
Timeline: ?



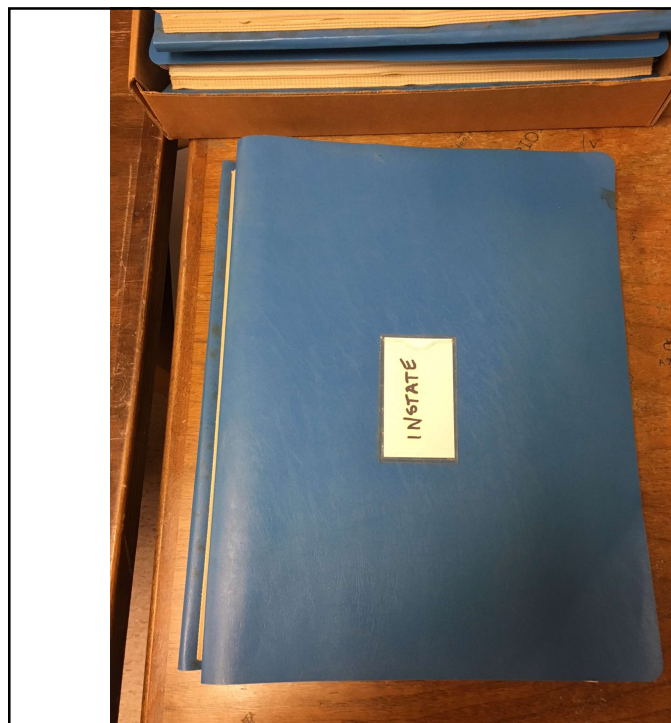
INVESTIGATE GENERAL AND EXTRA-AGENCY SCHEDULES

ET CETERA

TESTING THE WATERS

Considerations:

- In archives because of apparent disposition error
- Not used and/or unserviceable because of restrictions
- Space needs exceed research value
- Consists of information reproduced in other collections
- Stored inappropriately



EXAMPLE 1: OVERSIZE REPORTS

Extent: 2.5 linear feet

Ledger size printouts

Loose and not part of any
collection

No apparent accession
records



Report: Enrollment counts by sex as of 15 Oct 1982



REAPPRAISAL: OVERSIZE REPORTS (1)

Questions

- Does the collection fit within the collecting policy?
- How often is it used?
- Would this collection and/or potential users be better served elsewhere?
- What condition is the collection in?
- What are the preservation/ maintenance costs?
- What is the potential research value?
- Is the collection comprised of formats not generally collected by the repository [...]?

Answers

- Yes, and no. Low priority.
- Never.
- Information more useful to potential users in another format.
- Poor, but not currently at risk.
- Mostly storage and space; containers needed: oversize folders, boxes
- Information useful, but ...
- Yes.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



REAPPRAISAL: OVERSIZE REPORTS (2)

Questions

- Does the collection contain reproductions or copies of materials that are located elsewhere?
- Is the collection or series restricted under federal or state law?
- If so, can portions of it be opened to researchers?
- Must the record series be kept for a certain period of time for legal or fiscal reasons?
- Does it retain any other value (e.g. historical, administrative, research, etc.)?

Answers

- No, but the information in the collection is likely located elsewhere in the archives.
- No.
- N/A.
- See next slide
- Yes, historical statistics. [but are these located elsewhere?]



SAA Guidelines for Reappraisal and Deaccessioning, 2012



OVERSIZE REPORTS, DISPOSITION OF?

Existing Guidance re. Retention

No obvious exact match

- GRS5.9 – Daily Operations: Monthly, Quarterly, and Periodic Reports. Retain three (3) years.
- LG5.1.34 – Public Schools: Student Enrollment Records.
 - (a) Annual enrollment figures. Permanent.
 - (b) Periodic enrollment updates. Retain one (1) year.

Current Plan of Attack

- Confirm that statistical information is captured elsewhere in the archives.
- If yes,
 - Document reappraisal process; deaccession despite lack of accession record.
 - Obtain authorization for destruction.
- If no,
 - Maintain as current?
 - Consider discarding anyway.

Priority: low



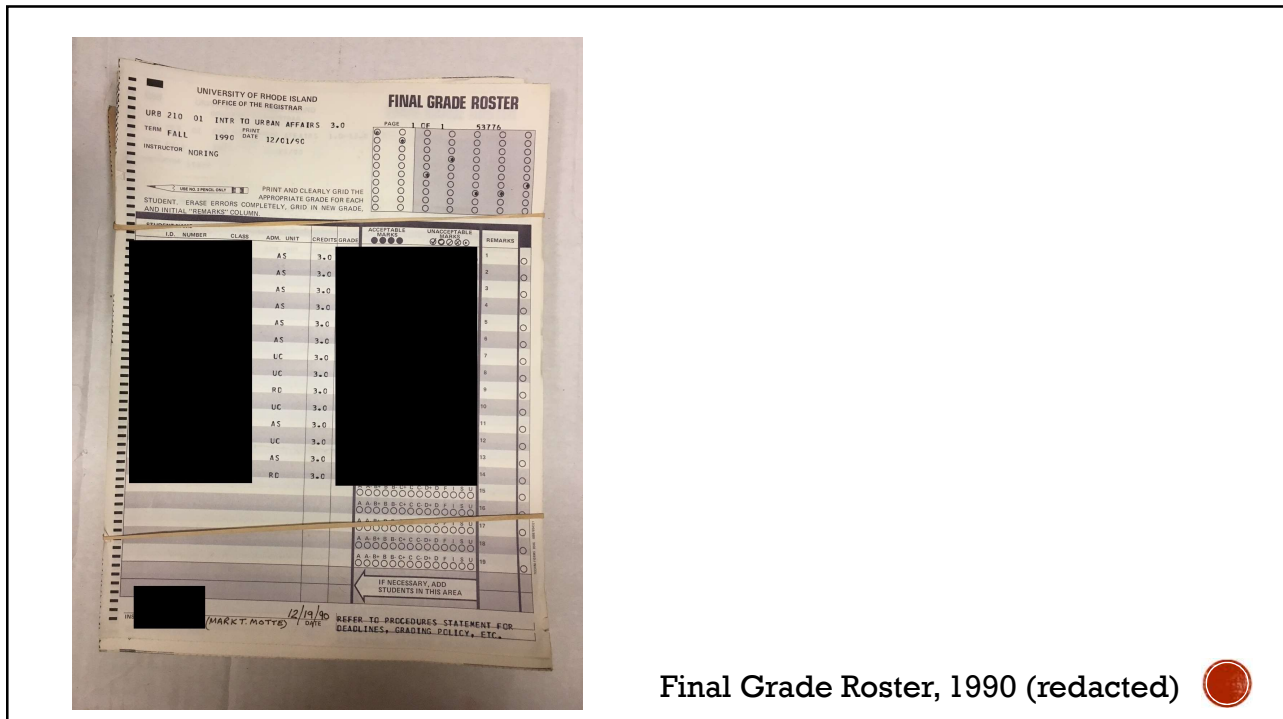


EXAMPLE 2: GRADE ROSTERS

Extent: 56 linear feet

Accessioned

Additional similar
collections in archives



Final Grade Roster, 1990 (redacted)



REAPPRAISAL: GRADE ROSTERS (1)

Questions

- Does the collection fit within the collecting policy?
- How often is it used?
- Would this collection and/or potential users be better served elsewhere?
- What condition is the collection in?
- What are the preservation/ maintenance costs?
- What is the potential research value?
- Is the collection comprised of formats not generally collected by the repository [...]

Answers

- Again, yes and no. Low priority.
- Never, ever.
- Potential users (limited) most likely to request information with regard to student rather than course offering. (Transcripts)
- Improperly stored.
- Space and storage; security risk (PII, FERPA)
- Minimal - none.
- No.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



REAPPRAISAL: GRADE ROSTERS (2)

Questions

- Does the collection contain reproductions or copies of materials that are located elsewhere?
- Is the collection or series restricted under federal or state law?
- If so, can portions of it be opened to researchers?
- Must the record series be kept for a certain period of time for legal or fiscal reasons?
- Does it retain any other value (e.g. historical, administrative, research, etc.)?

Answers

- Information is located in transcripts (permanent records).
- Yes. FERPA.
- No.
- See next slide.
- Minimal.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



GRADE ROSTERS, DISPOSITION OF?

Existing Guidance re. Retention

No obvious exact match, not even in Public Schools Agency Schedules.

- LG5.1.29 – Public Schools: Student Test Results.
Retain until of no further administrative value.
- LG5.1.10 – Public Schools: Teachers' Student Files.
Retain until final grades and testing data posted.

Current Plan of Attack

- Annotate collecting policy: Transcripts accepted, grade rosters, grade change forms, etc. not accepted.
- Deaccession.
- Obtain authorization for destruction.

Priority: high



EXAMPLE 3: REGISTRAR'S CARD FILE

Extent: 8 cabinets

Student records

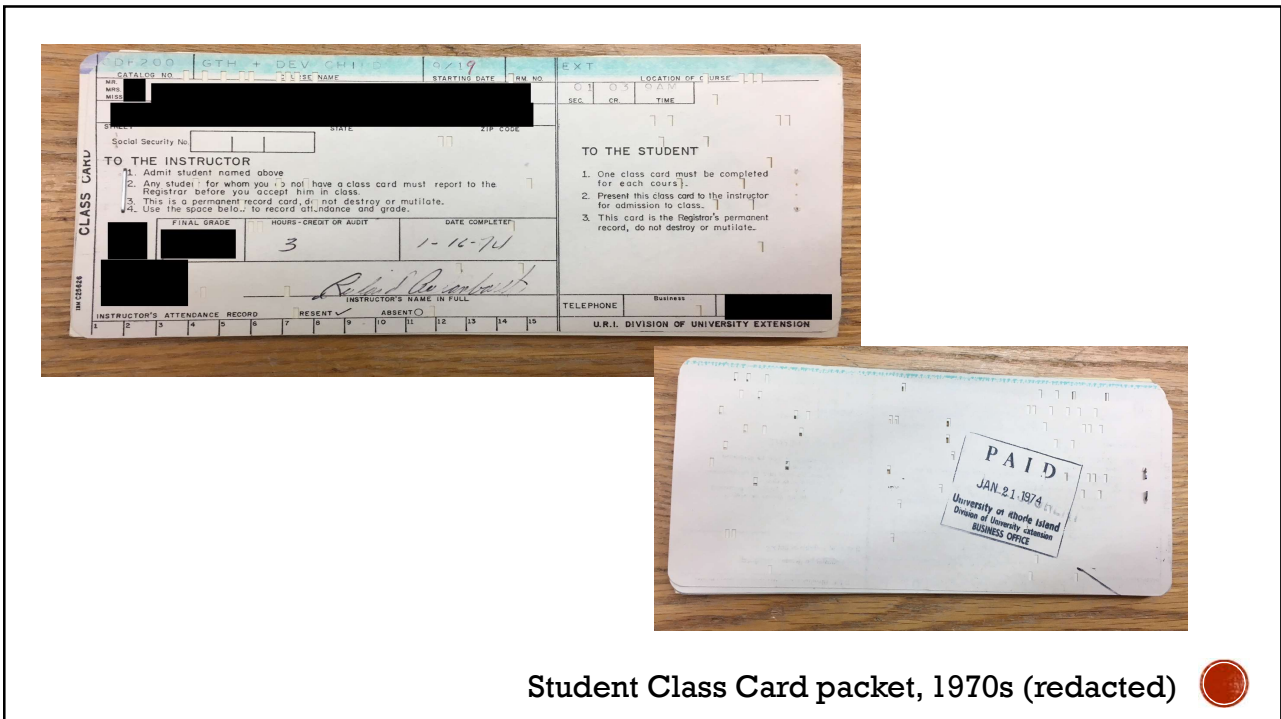
Unclear whether
accessioned

Registrar's Card File (redacted)





Registrar's Card File (redacted)



Student Class Card packet, 1970s (redacted)



DESCRIPTION OF YOUR JOB		PHONE NO.		
COURSE NO.	TITLE OF COURSE	SEC.	TIME	ROOM
Hist. 3	Hist. of Western Civ. to 1715	S-1	7:00PM	209
STARTING DATE	LOCATION OF COURSE	NO. WEEKS	STUDENT INFORMATION (PLEASE CHECK)	
2/15/67	Univ. Extension Bldg.		NEW STUDENT	
Circle highest year of school completed.	High School	College	Graduate School	ATTENDED PRECEDING SEMESTER
	1 2 3 4	1 2 3 4 or no. of Credits	1 2 3 4 or no. of Credits	<input checked="" type="checkbox"/>
	NAME-ADDRESS		FORMER U.R.I. DAY STUDENT	CURRENTLY ENROLLED U.R.I. STUDENT
	[REDACTED]			
			TO-DAY'S DATE	
			3/15/67	
			PHONE NO.	
			[REDACTED]	
			DATE OF BIRTH	
			[REDACTED]	
EXTENSION DIVISION PERMANENT RECORD FORM ←				

Student Class Card, 1967 selection (redacted, emphasis mine)

REAPPRAISAL: REGISTRAR'S CARD FILE (1)

Questions

- Does the collection fit within the collecting policy?
- How often is it used?
- Would this collection and/or potential users be better served elsewhere?
- What condition is the collection in?
- What are the preservation/ maintenance costs?
- What is the potential research value?
- Is the collection comprised of formats not generally collected by the repository [...]?

Answers

- Yes. Low priority.
- Never.
- Yes, assuming these records were maintained in addition to transcripts.
- Satisfactory, except rubber band bundling.
- Space and storage; security risk (PII, FERPA)
- Minimal - none.
- No.



SAA Guidelines for Reappraisal and Deaccessioning, 2012

REAPPRAISAL: REGISTRAR'S CARD FILE (2)

Questions

- Does the collection contain reproductions or copies of materials that are located elsewhere?
- Is the collection or series restricted under federal or state law?
- If so, can portions of it be opened to researchers?
- Must the record series be kept for a certain period of time for legal or fiscal reasons?
- Does it retain any other value (e.g. historical, administrative, research, etc.)?

Answers

- Presumably there are transcripts, which contain the most important information from these cards.
- Yes, FERPA.
- No.
- See next slide.
- Not in this format.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



REGISTRAR'S CARD FILE, DISPOSITION OF?

Existing Guidance re. Retention

No match; Public Schools Agency Schedules:

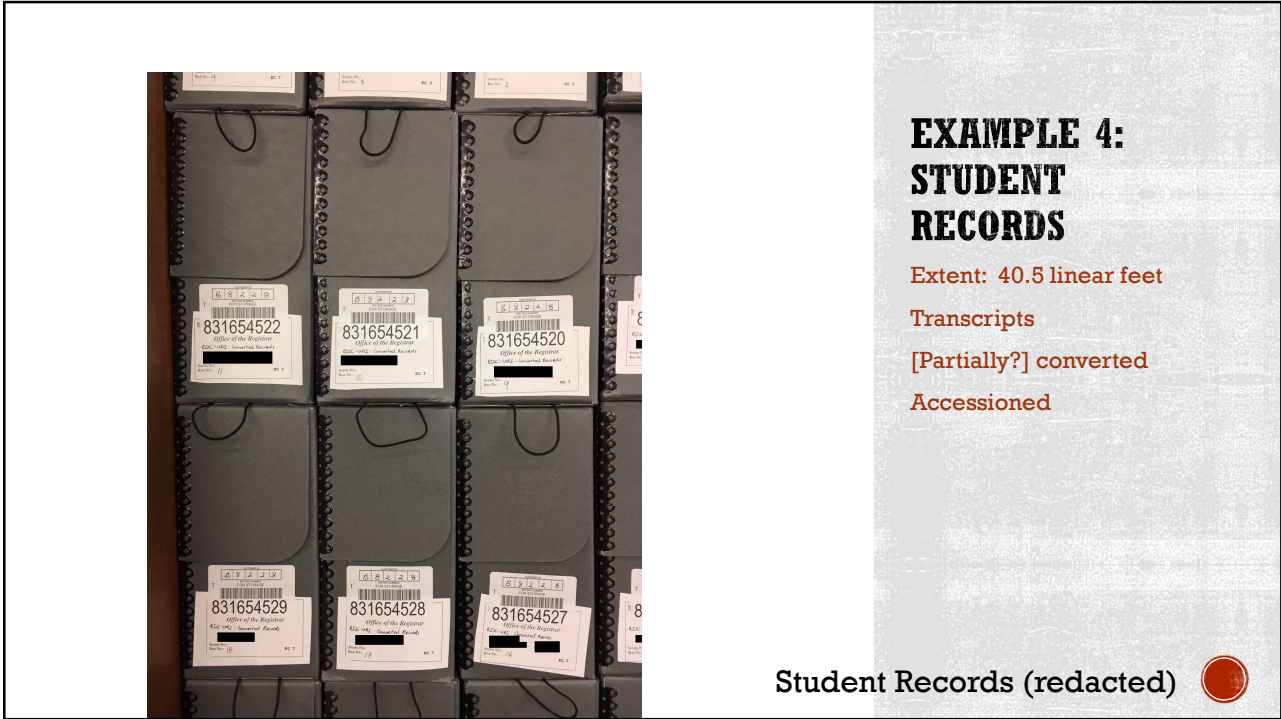
- LG5.1.29 – Student Test Results. Retain until of no further administrative value.
- LG5.1.34 – Student Enrollment Records
 - (a) Annual enrollment figures. Permanent.
 - (b) Periodic enrollment updates. Retain one (1) year.
- LG5.1.26 – Student Registrations.
 - (a) Annual registration report. Permanent.
 - (b) Registration applications. Retain one (1) year.
 - (c) Teacher's Attendance Registers. Retain until of no further administrative value.

Current Plan of Attack

- Confirm existence of transcripts for the period covered.
- If yes,
 - Document reappraisal process; deaccession despite lack of accession record.
 - Obtain authorization for destruction.
- If no,
 - Maintain as current
 - Accession.

Priority: medium.





REAPPRAISAL: STUDENT RECORDS (1)

Questions

- Does the collection fit within the collecting policy?
- How often is it used?
- Would this collection and/or potential users be better served elsewhere?
- What condition is the collection in?
- What are the preservation/ maintenance costs?
- What is the potential research value?
- Is the collection comprised of formats not generally collected by the repository [...]

Answers

- Yes. Permanent and vital record.
- Rarely.
- Yes, if Registrar's office had more direct access.
- Good. Some (if not all) have been converted (per annotation).
- Storage and space;
Risk (PII, FERPA)
- No.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



REAPPRAISAL: STUDENT RECORDS (2)

Questions

- Does the collection contain reproductions or copies of materials that are located elsewhere?
- Is the collection or series restricted under federal or state law?
- If so, can portions of it be opened to researchers?
- Must the record series be kept for a certain period of time for legal or fiscal reasons?
- Does it retain any other value (e.g. historical, administrative, research, etc.)?

Answers

- Yes! Some (if not all) have been converted (per annotation).
- Yes, FERPA.
- No.
- See next slide.
- Yes. Permanent, vital record.



SAA Guidelines for Reappraisal and Deaccessioning, 2012



STUDENT RECORDS, DISPOSITION OF?

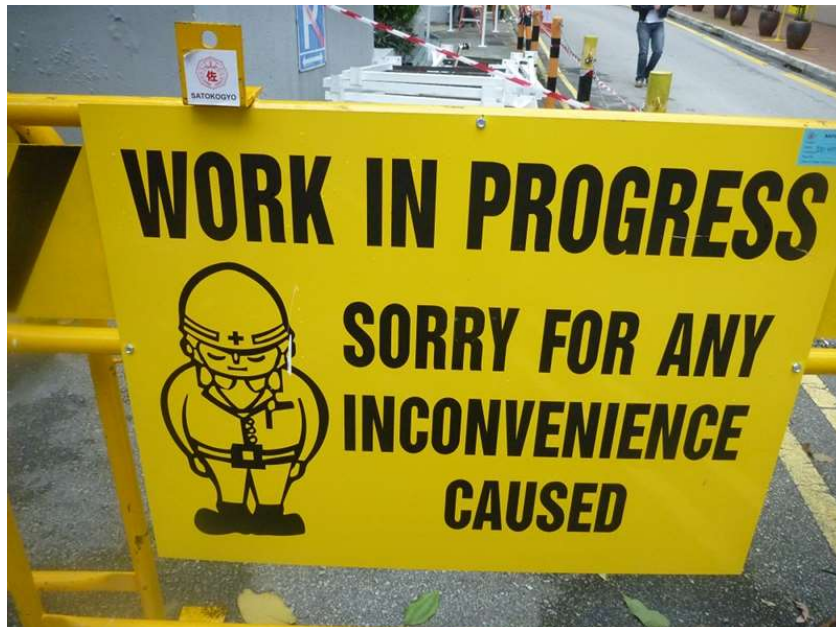
Existing Guidance re. Retention

- LG5.1.1 – Public Schools: Student Record Folders
 - (a) Permanent Record Card. Permanent
- [Rules and Regulations for the Making and Management of Imaged Public Records](#)
- R.I. Gen. Laws § 38-3-5.1 (emphasis mine):
 - If any department [...] has caused any or all of the records to be recorded, copied, or reproduced by [...] any process which accurately reproduces or forms a durable medium for reproducing the original, the original may be destroyed in the regular course of business, provided the process meets standards [...]

Current Plan of Attack

- Confirm that transcripts were converted and that both the process and final product meet PRA-established standards
- Confirm that the converted records are being appropriately maintained per PRA-established standards
- If yes,
 - Inform Registrar's office of intent to deaccession
 - Return to Registrar, or
 - Obtain authorization for destruction.

Priority: medium



THANK YOU

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