

You Can Do It: Records Management - Spring Break 2019

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Introduction

My name is Brigette Kamsler and I am the University Archivist here at GW. I began working here in August 2018, so some of you may have never seen me before. Prior to my work here, I was the United States Corporate Archivist for the global bank, HSBC (HongKong Shanghai Banking Corporation). Records management is incredibly important to a bank; we had regular meetings with staff throughout US locations, usually via phone calls and WebEx and I might not even see the materials in person before it would be transferred. What I did there and what banks do in general with records management can actually apply very well to the records management of a large university.

Having questions and feeling unsure is completely normal in this situation, so do not fret!

Originating in 2004, and last revised in 2017, the Records Management policy is one that applies to all schools and divisions that maintain GW records. An effective Records Management policy allows us to meet operational needs and legal requirements for records retention and privacy protection, optimize office space, minimize the cost of record retention, and properly dispose of outdated records. This policy applies to all records, regardless of whether they are maintained in paper, electronically, or in some other manner.

Learning Objectives:

So today we have a few objectives for this workshop. I thought it would be beneficial for everyone to be on the same page about what archives are, what the University Archives at GW are and why we save the information that we do.

Next we will talk about records management generally - what is it, why we do it and how it applies to us as a whole, and some terms.

Lastly I will discuss the GW policy itself and other related documents that GW has provided, first how you can find it in the policy library, what it shows, and then how to start your records management journey with your own records.

This will not be the most exciting of talks but I hope that you will leave here knowing a bit about archives, where to find the policies and how to start using the policies that have been written.

What are Archives

First, let us start with -- what are archives?

- Archives are collections of **non-current**, but historically important material. They provide evidence to show the day-to-day activities of the people and organizations which originally created the collections.
- Materials considered "archival" could be, but are not limited to, photographs, correspondence, minutes, maps, audio-visual material, and publications.
- Some interchangeable terms can be documents, records, materials, archives, etc...

In the case of this workshop - what is a record? A written or printed work of a legal or official nature that may be used as evidence or proof. For collections of materials, archivists use the term "records" if they were created by an organization, or "papers" if they were created by an individual.

Here at GW we have all sorts of Archives and archival collections. Our primary collecting areas include 1) University Archives, which I will talk more about, 2) the history of the city of Washington D.C. and the experience of its residents, 3) Labor history, documenting the American labor movement, especially the history of the International Brotherhood of Teamsters, 4) the history of Education, especially through the records of the National Education Association.

Also just to mention, our Special Collections contain much more than just archives - the rare book collection includes roughly 75,000 bound rare volumes, of which 15,000 are part of the Kiev Judaica collection, which seeks to document Jewish history, culture and literature in support of the Judaic Studies Program of Columbian College of Arts and Sciences.

These rare books support teaching and research and support existing archival and manuscript collections. There are representative works from the major moments throughout print history and prominent examples of print and binding techniques. We also have legacy books still in the collection that were held by the original library of Columbian College.

What is the University Archives

- The University Archives is the official repository of the George Washington University with a mandated responsibility to preserve the historically valuable documentation of university units and individuals, including faculty, staff, and administrators, and its community. It has the duty and authority to collect, appraise, describe, preserve and make available University records of enduring value, complying with appropriate laws and regulations, approved retention schedules, and University policies.
- We also document the students, classes, faculty, and daily life of the campus in all of its forms.

- The heart of our organization’s memory is in its records. If the university values its history, we must act to save the original letters, minutes, reports, photographs, publications, and other documents—in both physical and digital forms—that officers, members, directors, employees, or volunteers have produced and compiled over the years. These documents provide unique testimony to the achievements of our school.

Memories are short, and people come and go. Information in the archives can enable new managers, new employees, the public, etc... to understand us. How did we get here, strengths and even shortcomings. We can show new things being developed over time, how we have responded to adversity and opportunities for prosperity. Archives can help project a positive image and create goodwill. This historical information can help build identity and loyalty, can be useful during orientation. The archives help us understand where we have been in the past, so we know where to go in the future.

Archives do have gaps in their information, either because the information just was not saved or the people at the time did not think it was important enough to save. We often have the most history about white men in archives. Archivists recognize these “archival silences” and are actively trying to collect materials and document all people.

What are we and what do we save

The Special Collections and University Archives within GW Libraries works to carefully preserve collections of written, visual, audible, and electronic material and ensure that these records are available for research, teaching and learning now and in the future.

The professionals within the department are experts in the areas of selection, preservation, and accessibility. Staff adhere to the archival profession best practices related to collection development, description of archival content, and ensuring discoverability and availability of these amazing resources.

We are interested in the records that best illustrate the purpose, activities, and policies of the organization. Such documents usually represent an “end product”— a final report, for example, instead of a draft. We are more interested in related groups of materials rather than individual items. Records should be inactive—that is, no longer regularly used for routine business. Records of defunct organizations are also often of interest to an archival repository.

Types of materials

Types of materials can vary widely: here are a few images. Could be photographs, papers, newspaper clippings, ledgers, digital materials, audio visual items

Archivists care for these materials. We gather the collections and organize them. We call this arrangement and description. We follow a few sets of principles: provenance and original order.

- Provenance: is information regarding the origins, custody, and ownership of an item or collection. This principle holds that the significance of archival materials is heavily dependent on the context of their creation.
- We typically do not mix collections together. This is original order.
- Original Order: is about the organization and sequence of records established by the creator of the records. Maintaining records in original order serves two purposes. This preserves existing relationships and evidential significance that can be inferred from the context of the records. If it is already well-organized, we can make it available more quickly too.
- Original order is not the same as the order in which materials were received. Items that were clearly misfiled may be re-filed in their proper location.
- A collection may not have meaningful order if the creator stored items in a haphazard fashion. In such instances, archivists often impose order on the materials to facilitate arrangement and description. The principle of respect for original order does not extend to respect for original chaos.

A good archives is a good business. An organization profits when its records that have lasting fiscal, legal, evidential, historical, and administrative values are preserved and managed so that the essential information in them can be used for current needs and future planning. GW is shaped by its past, and an archives enables it to transform information from the university's past into an asset for the future - better management, better classes, better understanding of what students need, better knowledge of our effect on the community, all of these can be gained because of the archives we preserve.

An introduction to "Corporate Archives and History: Making the Past Work," written by Donn C. Neal, says:

"An archives is not a storehouse of dusty, unused records. Neither is it an altruistic gift to future researchers. Nor is it a monument to corporate ego. Instead, it is an asset to better management - a practical, living instrument through which the corporation can marshal the information it produces and collects, can gain ready access to this information as needed, and can use the information to achieve its corporate goals." (page 3)

I think this is a good quote because it sort of bridges the gap between archives and the records management program.

What is Records Management

Anyone could have questions for us about something to do with the history. When did this school program start? When did this building get built on the Foggy Bottom campus? What did you do about Title IX last year? These questions can be answered in part due to a good records management program.

The general purpose of a system of records management is that of:

- providing the creator with the records necessary to support the efficient continuation of its activities
- guaranteeing the recorded evidence, whether for internal purposes or for regulatory compliance.

We want to:

- produce and acquire reliable records for legal and technical purposes;
- organize records in an orderly and coherent manner linked to the functions performed;
- preserve authentic records;
- And have speed and efficiency when retrieving the records again.

Our special collections page does include a section on records management, which links to the various policies.

Archives do not keep EVERYTHING. In fact some of us love weeding, which is removing unnecessary or duplicative records! A records management program will weed files, discarding the ones no longer needed, winding up with the ones it pays to keep permanently.

A great records management program can help us save time and money. It assists in the separation of information that is truly valuable from the mass of documentation that is not. Less storage means less cost, and also less time searching for important information. We can also work together to reduce duplication.

Some people may think it is unwise to hold onto certain records, and get a little nervous about what is documented inside. Unfortunately this is a more short-term idea, and can have severe hidden costs. Throwing out records has the same effects as cutting out pieces of a manager's memory. It may remove precisely the document you need to prove something was NOT done, whether in a lawsuit or public relations. A document is a good tool to show an organization has a good record.

The roles of individuals

This applies to all of us because all of us here at GW are making records. When we attend meetings and take notes; when we send email; when we go to events. All of this is documenting not only what we are doing at the university, but what the University wants done and what it finds important.

The university is committed to effective records management that includes meeting operational needs and legal requirements for record retention and privacy protection, optimizing the use of space, minimizing the cost of record retention, and properly disposing of outdated records. The Records Management Policy applies to all University Records, regardless of whether they are maintained in paper, electronically, or in some other manner.

Think of Records Management as something to help you - you only have to keep your current, active records with you or nearby. You transfer these important records to the archives not only for storage, but for people to understand in the future what you and your department were doing. And, if a question comes up, you (or the individual with the question) can be directed to the archives in order to find the answer to the question.

Our records from the early time period are spotty, which is why it is great that we have the Records Management Policy now. This will help ensure that in the future, 100 years or 200 years from now, we will have a good documentation of what was happening at this time on campus (and hopefully fill some of those archival silences).

Perhaps the time you will appreciate this the most is when you really need an answer to something - and you find it! We can take pride in knowing we are preserving the past work done here, and the GW community and the public will know the history better as well.

A great example of this was soon after I started, I was asked by the Division of Operations about why Rice Hall was named that, and was it associated with a donation or anything along those lines. I was able to definitively answer this because of our records, specifically the Board of Trustees records and News Releases. The News Release says that the GW Board has adopted a policy on naming buildings. It was decided that going forward, existing and unnamed buildings would be "named for individuals associated with the Washington area and distinguished in American thought and culture."

The Board of Trustees minutes details the above a bit further, and that the policy was on behalf of the Special Committee on Naming Some of the University Buildings. The Trustees also adopted that new buildings be named with the same procedure after full investigation has been made of possible donors.

So, let's look at a few basic records management terms, make sure we are all on the same page. We have already discussed records and records management. I will be making my notes available so you do not need to try and write down what I am about to say!

Definitions of basic records management terms, such as:

- **Records retention schedule:** A policy that defines how long items must be kept and provides disposal guidelines for how items should be discarded.
- **Vital record:** Something like a birth certificate and marriage license. Probably won't have in your work records!
- **Record copy:** The single copy of a document, often the original, that is designated as the official copy for reference and preservation.
- **Retention Period** refers to the established period of time that University Records should be maintained for the university's business operations or archival purposes, or to satisfy specific requirements, including, but not limited to, accounting, audit, legal, and tax requirements, after which period of time the records are subject to Disposal.
- **Disposal** refers to the process of permanently destroying or deleting University Records after the Retention Period has expired, including, but not limited to, recycling records containing Public Information, shredding records containing Regulated or Restricted Information, in accordance with the level of confidentiality or sensitivity of the records, and erasing electronically stored records.
- **Records Survey** refers to the creation of an inventory of all types of University Records maintained by a school or division, including information regarding their quantity, physical form, type, location, value, and format (such as paper or electronic).
- **Litigation Hold** refers to the process used to preserve all forms of relevant information when litigation is anticipated or pending. OGC will notify relevant departments and work with staff to identify and preserve any records (including electronic records) and other information that could be relevant to the matter.
- **Regulated Information** refers to information that is protected by local, national, or international statute or regulation mandating certain restriction as defined in the Information Security Policy. Examples of Regulated Information include government issued identification numbers (e.g., social security numbers and driver's license numbers), financial account numbers (e.g., credit card numbers and bank account numbers), and personal health information.

Restrictions

I want to ensure you that the records that you transfer to the archives are not necessarily going to be immediately open - knowing this can help alleviate the stress of transferring records. Different collections in the archives do have different numbers of restrictions.

Some of this is due to federal and local regulations, others have been worked out with the department or group.

- **Restricted Information** refers to information that must be limited to appropriate university faculty, staff, students, or other authorized users with a valid need. This information must be protected from unauthorized access, use, or disclosure consistent with university policies, contract, or designation, or with proprietary or privacy considerations.
- **Public Information** refers to information with no restrictions on access, use, or disclosure, as defined in the Information Security Policy.

I also want to mention however that we do try to get access to researchers for these records when possible. We do this by being a facilitator to the researcher to request access. Typically the researcher would put together a request letter explaining what they want to look at and why. The archives staff does the first look through the records - can we tell why this is closed? Is it because there is social security information in here? Private health information? Something else sensitive? In the past at other jobs, I have been able to make collections available by redacting (removing) sensitive information like social security numbers.

After this review, we send it to our Dean, Geneva Henry, for her thoughts and opinions. If she has further questions or concerns, we can work to answer those. If she agrees with access, we forward the original letter with Geneva's agreement to the office itself. For example, the office of the president.

This is a very typical practice across archives. At my last job at the bank, they had a blanket restriction of 35 years embargo on all non-public records. However they still wanted to grant access - they decided to hire authors to write a modern history of the bank. They put out a call for proposal and ultimately awarded the contract to two respected historians who gained full access to all of the records. They then wrote a book, which is fully cited. While it does not give a regular researcher in-person access, it at least can pull the veil back from some of this history of the recent past (and for banks, the last 10 years with the financial collapse and various deferred prosecution agreements, this is a pretty big deal).

If you are concerned that material considered confidential may be represented in your organization's records, be prepared to identify items or groups of items of concern and then discuss the possibility of restricting part of the collection to protect the privacy of you or others. While the SCRC desires to make all materials freely accessible to researchers, we will agree to reasonable and equitable restriction for limited periods of time.

We try to make this obvious and straightforward to identify. Let's look at a specific example, RG0002: Office of the President, has records closed for 50 years from the date of record creation.

The Records Life Cycle

An illustration of what we do with records is the records life cycle. The life cycle is the distinct phases of a record's existence, from creation to final disposition. This model portrays the life of a record as going through various stages or periods, much like a living thing.

It basically is broken into:

- Creation
- Active use by those who created the record
- Semi-active or inactive storage
- Final disposition / send to archives

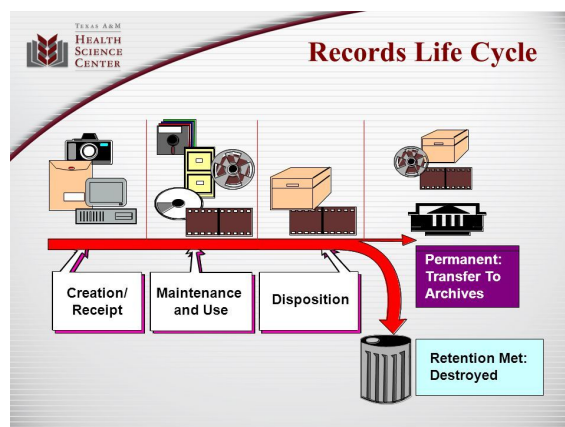
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In stage one, the record is created, usually for an administrative purpose. You performed an action that is documented by a record. At this point it doesn't really matter what the nature of this item is; just that a transaction has occurred and a "documentary trail" is created.

However it was created and whatever form it takes (digital, physical, etc), for a period of time this record will be important and used by or for those who created it. A deposit slip from a bank may be useful if next month's checking account statement shows an accounting error. A presidential veto statement may be significant for weeks, months, or years. Eventually though, this record becomes inactive. That banking error was corrected, or the president's veto is no longer political news.

Now the record enters semi-active or storage phase. That bank may need to keep the correction information for bank auditors. Perhaps now your digital files are moved to Box, or your physical records are moved somewhere else.

The last stage of the life cycle is disposition. Now you decide, using resources provided, if a record should be destroyed or if it should be transferred to the archives. The records schedule is extremely important during this life cycle, and can help you even from the time of creation of the record. From the beginning you could have in your mind how long you need to keep something, and what you do with it when the time comes. This can inform how you store and organize the records in your office too.



The life cycle model not only describes what will happen to a record, it also defines who will manage the record during each stage. During the creation and active periods, the record creators have primary responsibility for managing the record. In the semi-active stage, it is the records manager who takes center stage and assumes major responsibility for managing the records. Finally, in the inactive stage, the archivist takes the lead in preserving, describing, and providing access to the archival record.

GW's Records Management Policy

The GW records management policy originated in April 2004, most recently revised in 2017 and reviewed in 2018. Schools and divisions that maintain George Washington University records are responsible for establishing appropriate records management processes in line with the contents of this policy.

Schools and divisions that maintain university records are responsible for establishing appropriate records management procedures. The Office of the Senior Vice President and General Counsel ("OGC"), the Division of Information Technology ("DIT"), and the Compliance Office ("Compliance"), and the University Archives shall provide standards to schools and divisions for drafting appropriate procedures.

Each school and division must have its records management procedures reviewed and approved by Compliance in collaboration with OGC, DIT, and Archives. Each school and division must also identify an individual responsible for implementing the respective records management procedures. This should be an individual in a position with sufficient knowledge and understanding of the operations and business needs of the school or division.

Finding, reading, and complying

So how do you go about finding these policies? All University Policies are available via the Compliance Office website. Now we are going to dive into some of these policies!

<https://compliance.gwu.edu/> → Policies

Find a policy - alphabetical list of policies - Records Management

The Policies:

Records Management: <http://my.gwu.edu/files/policies/RecordManagementFINAL.pdf>

University Records Schedule:

https://compliance.gwu.edu/sites/g/files/zaxdzs2791/f/univ_records_sched_branded.pdf

Information Security: <http://my.gwu.edu/files/policies/InformationSecurityPolicyFINAL.pdf>

Implementing Procedures for Records Management Policy:

https://compliance.gwu.edu/sites/g/files/zaxdzs2791/f/Records_Mgmt_Procedures_bran ded.pdf

The Records Schedule goes more explicitly into the type of record, the custodian and the number of years it should be kept. Then, do you notice the little asterisks? Those are the material designed for long-term care and transfer to the archives.

This University Records Schedule provides timeframes for the retention and disposal of University Records in accordance with applicable **legal, regulatory, accreditation, and other standards, including recommended best practices**. “University Records” means all official materials created in the course of the university’s operations. This includes information created or received in any form, such as emails, paper documents, electronic files, database or application information, photographic media, and other electronic information.

Just to reiterate, if you see something that is supposed to be kept for the 5 years, 10 years, etc... but you are not using them actively - they can be put in a different type of storage. You are not using it in the everyday, so it is in maintenance mode. At the end of the time frame, if it doesn’t say permanent, then it can be securely disposed. Check in your department to see who may already be established as the “records manager.”

If you have questions about why something was determined for a specific time frame, the people you should be contacting is the office of Compliance. After that, it could be escalated to OGC, and DIT.

Two examples I have had recently – a department invited me to their office to look at some materials and while there I was telling them generally about what we collect. I was shown to a small closet that had old newspapers and I noticed some boxes that said Faculty Search, 2011-2012. My mind immediately went “Hmm!” because I knew the records management policy would apply.

Now, if you are ready to start implementing this policy, the University has also provided a handy document about this.

Implementing Procedures

A. Conducting a Records Survey

Schools and divisions should conduct a Records Survey by creating an inventory of all categories of documents maintained by the school and division, including those in paper, electronic, or any other format. To conduct the Records Survey, you should do the following:

1. Make a list of all categories of records created and maintained by the school or division;
2. Determine whether records contain Public Information, Regulated Information, or Restricted Information, as defined in the [Information Security Policy](#). Some must be reported - again, all is in the information security policy;
3. Distinguish any University Records the school or division is required to retain under a Litigation Hold and note any documents that may otherwise be the subject of a claim, audit, agency charge, investigation, or enforcement action that has been identified; and
4. Distinguish any University Records the school or division should offer to the University Archives before Disposal.

For assistance with the Records Survey, schools and divisions may contact the University Archives, Compliance and Privacy Office, or DIT.

For assistance determining whether University Records have long-term historical or administrative value to the university, schools and divisions should contact the University Archives. Schools and divisions should review their Records Survey on an annual basis to identify any material changes.

B. Establishing Records Management Procedures

Based on the Records Survey, you will now create management procedures. Consider such factors as:

1. Who will be responsible (by position, rather than named employee) for implementing the University Records Schedule. This should be an individual in a position with sufficient knowledge and understanding of the operations and business needs of the school or division;
2. Whether paper documents will be retained, sent to storage, or scanned into an electronic data management system;
3. Whether University Records are of long-term historical or administrative value to the university and, if so or if there is any uncertainty, **contact the University Archives**; I would rather help you than you be unsure or throw something away that should have been kept! and
4. How University Records will be disposed of, making sure that University Records containing Regulated or Restricted Information are shredded prior to Disposal as appropriate.

Each school and division must have its records management procedures reviewed and approved by the Compliance and Privacy Office, which will consult with OGC, DIT, and the University Archives. If a school or division wishes to make any substantive changes to its approved records management procedures, the school or division should contact the Compliance and Privacy Office to review and approve the changes.

C. Implementing the University Records Schedule

1. Records listed on the [University Records Schedule](#)
 - a. University Records must be retained for not less than the minimum Retention Period specified for that category of record. At the conclusion of the Retention Period, the University Records must be destroyed, unless (i) OGC authorizes an exception, (ii) the applicable records are subject to a Litigation Hold, or (iii) the applicable records are transferred to the University Archives.
2. **Records not listed on the University Records Schedule**
 - a. **If there is a category of University Records maintained by a school or division that is not listed on the University Records Schedule, the appropriate official from that school or division should contact the Compliance and Privacy Office with a description of the category of University Records and a recommended Retention Period. The Compliance and Privacy Office will work with OGC to review and modify the University Records Schedule as appropriate.**
3.
 - a. The Compliance and Privacy Office may make additions, deletions, and modifications to the University Records Schedule. Faculty and staff should contact the Compliance and Privacy Office promptly if they believe that applicable standards require a Retention Period that differs from the period established in the University Records Schedule.
4. Disposal of University Records
 - a. In absence of a Litigation Hold or an authorized exception, schools and divisions are responsible for the proper Disposal of University Records upon expiration of the Retention Period established in the University Records Schedule. The appropriate method for Disposal depends on the physical form or medium (e.g., paper or electronic) and the subject matter of the University Records.
 - b. University Records containing Regulated or Restricted Information, as defined in the Information Security Policy, must be destroyed in accordance with the level of confidentiality or sensitivity of the records, including, as appropriate, secure shredding or recycling.
 - c. Schools and divisions may contact DIT for assistance with the destruction of electronic University Records stored in university systems in accordance with the established Retention Periods.
5. Convenience Copies
 - a. To meet business and operational needs, schools and divisions may create and maintain unofficial copies of University Records for various purposes. Schools and divisions should make such convenience copies only when there is a compelling business or operational need.

- b. If a school or division has convenience copies of University Records, that school or division is responsible for the proper Disposal of such copies. Convenience copies should not be maintained after the expiration of the applicable Retention Period.

D. Contacts

Questions about these procedures should be directed to the following offices based on the subject:

- Questions on the University Records Schedule or Litigation Holds:
Office of the Senior Vice President and General Counsel (202) 994-6503
gwlegal@gwu.edu
- Questions on Records Management Procedures and Compliance
Compliance and Privacy Office (202) 994-3386 comply@gwu.edu
- Questions on Records Management
University Archives (202) 994-7295 archives@gwu.edu
- Questions on Management and Destruction of Electronic Records
Division of Information Technology (202) 994-4948 ithelp@gwu.edu

When you do get to the point of transferring records to us and following the records management policy, we take ownership and control of the records. Taking physical control can literally mean you giving us boxes of paper records, or granting us access via Box.

Box, I want to point out, is approved for all types of electronic records storage - restricted, confidential, etc... and lucky for you there is an Intermediate Box workshop on Thursday, March 14 from 1-2:30pm in Gelman Library room 301-302 for you to learn more! Once we take physical control of the records, we get intellectual control by accessioning the record into our databases and doing basic description.

What you can do to help is keep your files organized: Create a filing system that is logical, and perhaps keep things in different areas from one another. For example, housekeeping and records of routine operations keep separate from operation and policy materials (sources that document the primary responsibilities of the office).

Divide the files into discrete chronological groupings so they can easily be separate and stored at regular intervals. Label folders with meaningful headlines, NOT "general" or "miscellaneous" if you can help it. Records receiving in an orderly fashion take less time to describe, ultimately making them easier to locate in the future.

Conclusion

Thank you all for coming, we have covered a lot of information here today. I hope that it was helpful and gave you an overview of the archives, why records management is

important, and how to get started. I plan to post these notes and the powerpoint online for anyone to read and review.

I also just want to conclude that even though this is required and the university itself can benefit from it, it can be useful for researchers. Last semester, we had a student in a class who was trying to find a University report on student suicide in the early 2000's. The report had been mentioned in a few places, including the Hatchet, but we could not find the actual report. If the records management policy had been in place, maybe it would have been easier to find from the beginning? Ultimately we were able to find the report thanks to web archives, but there are so many uses and reasons to save our records for the future.

Questions

I am always happy to try and answer your questions, either individually or here. I am also happy to come to the offices and check out records in question in person.

Contact

Here is the information how how to contact me and also to go to our website.