Executive Summary for Process Simplification Steering Committee
Records Management Project
January 28, 2008

I. Introduction

In March 2007, the Records Management team was established to examine current practices for the retention and destruction of records throughout the University and propose improvements for more efficient, effective, compliant and systematic records management. The team was charged with offering final recommendations: 1) to improve academic and administrative units' retention and destruction practices and their awareness of and compliance with Commonwealth and University policies; 2) to determine ways in which technology can streamline and improve records management (e.g. document imaging, etc.); 3) to create a sustainable approach in educating the University community about policies and procedures. Improving the efficiency and effectiveness of the University's records management program is imperative for compliance with state law, and proper records retention and destruction practices.

Currently, the University has one half-time designated Records Officer who provides advice on Commonwealth directives, updates the Records Management website, and approves the destruction of documents. This individual currently works for the University Library system and is a member of the staff of the Special Collections Department.

Records management is the administrative term for: the maintenance of currently-active, administratively-useful, public records; the disposition of public records that no longer serve administrative, legal, fiscal, or historical purposes; the preservation of those records that have historical value or that must be preserved by law or for other reasons.

As defined in the Virginia Public Record's Act, a: "Public record" or "record" means recorded information that documents a transaction or activity by or with any public officer, agency or employee of an agency. Regardless of physical form or characteristic, the recorded information is a public record if it is produced, collected, received or retained in pursuance of law or in connection with the transaction of public business. The medium upon which such information is recorded has no bearing on the determination of whether the recording is a public record." (*Code of Virginia §42.1-77.*)

Team members included:
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- Christian Dupont, University Library
- Carolyn E. Fulk, Internal Audit
- Susan M. Davis, Office of the Vice President and Chief Student Affairs Officer
- Aron Teel, Information Technology and Communication
- Steven S. Wasserman, School of Medicine
- Rick Seaman, Office of the Assistant Vice President for Finance
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- Cindy Vaught, Executive VP and Provost
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- Nannette Keenan, Office of Process Simplification
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II. Approach to Work

Several research methods were used to gather data on the records management procedures both internally and externally. They included: 1) an evaluation of the Virginia Public Records Act of the Code of Virginia; 2) surveys to academic and administrative units on current record retention and destruction practices; 3) analysis of existing University services and expenditures; 4) internal benchmarking and site visits to Fontana warehouse, Ivy Stacks, and the School of Medicine; 5) external benchmarking and site visits to Virginia Tech's records management facility, Security Business Archives, and the State Records Center at the Library of Virginia and; 6) research on records management software products and document imaging.

III. Research Findings

A. **Brief Summary of State Requirements:** In Virginia, overall legal authority to implement state records law is vested in The Library of Virginia (LVA) *(Code of Virginia, §42. 1-76).* The state code establishes complex requirements for preservation, public access, and destruction of covered records. In implementing state law, the LVA publishes detailed schedules dictating the length of time individual categories of public records must be preserved, and when they must be destroyed. Both analog (print) and electronic records (including email) are covered by these retention and destruction schedules. Essentially all records created by all employees of the University are subject to these requirements. Further, unless specifically exempted, these University records are also subject to public disclosure. Changes enacted by the legislature in 2006 strengthened the requirement that records be destroyed on time by covered state entities, such as the University. These changes were driven by a concern for accidental disclosure of confidential records and to address state liability concerns.

B. **Surveys**
   University-Wide Survey: Survey was distributed to 185 University unit or department heads soliciting information about current unit-level practices. One hundred and twelve (112) survey responses were received for a response rate of approximately 61%; however, because the recipients were asked to share the survey with anyone in their area responsible for records management it is difficult to cite a definitive response percentage rate. The greatest number of respondents was in the areas reporting to the EVP/Provost (43) and the VP and Dean of the Medical School (25). Key survey findings include*:*
   - *Records Responsibilities*: 70% reported their job description includes records management; 68% responded that they perform records functions on an informal basis without acknowledgement of that role in their work profile.
   - *Awareness of Legal Requirements:* 60% stated they follow special procedures or steps in retaining or destroying confidential records.
   - *Training*: Only 31% replied they had some formal records management training.
   - *Contacts with the University's Records Officer*: Despite state legal requirements to the contrary, only 37% request approval from the University's Records Officer prior to destroying records.
   - *Types of Records Managed:* Respondents reported managing a range of record types, such as records pertaining to:
     - Policy (44%);
     - Student (51%);
     - Procurement/Contracts (54%);
     - Personnel/Employment (80%);

- o General Administrative (85%); and,
- o Financial (85%).
- *Records Storage Locations:* Respondents report storing records in:
  - o Individual offices/files (89%);
  - o Central offices/files (56%);
  - o Offsite (and rented) space (36%);
  - o Individual computer workstations (61%); and,
  - o ITC or HSCS servers (42%).
- *Records Retrieval and Destruction*
  - o The majority of respondents (87%) report they have a systematic way to store and retrieve paper records.
  - o The majority of respondents (72%) report they have a systematic way to store and retrieve electronic records.
  - o Respondents reported using the following methods of records disposal: shredding (91%); electronic deletion (54%); and recycling (44%).
- *Resources Needed:* Respondents were invited to identify resources they would find helpful in improving records management processes:
  - o Training in records management (62%);
  - o Records destruction services (47%);
  - o Space/storage for paper records (46%);
  - o Records management help desk (45%);
  - o Electronic data/computer destruction services (38%);
  - o Document imaging system (34%);
  - o Space/storage for electronic records (34%);
  - o Records management software (32%);
  - o Volume recycling (17%); and,
  - o Dedicated staff within dept (18%).

Fiscal Administrators' (FA) Survey: FAs were surveyed to collect additional information about annual records storage expenditures and storage sites.
- Survey revealed annual record storage expenditures totaling $121,568 for a volume of 11,637 standard record boxes.
- In addition to University-operated locations, multiple commercial storage sites/vendors were reported: U-Stor-It, C'Ville Self-Storage, Madison Self-Storage, Security Business Archives, Avon Self-Storage, KMX Document Storage, Store-it-Right, North C'Ville Self Storage, and the Fontana Warehouse operated by Aramark.

C. Administrative Findings
Oracle Report Expenditures of Records Management Services:
- Storage at Fontana – approximately $192,000 per year.
- Storage at Security Business Archives (SBA), spending since 2002 - $66,283. (Note: SBA annual contract via Medical Center is currently about $143,000-$150,000 with some Agency 207 (academic) departments included.)
- KMX mobile Security Shredding - $18,426 for services from July 1, 2001- June 30, 2007. Schools and departments utilizing KMX included Student Financial Services, Neurology, Drama Department, Curry School, Law School, Psychology, Anthropology, French Literature/General Linguistics, and the Teaching Resource Center.
- Kodiak Shredding - $684 for services from July 1, 2001- June 30, 2007. Departments who utilize this service were undeterminable.

Recycling: Confidential recycling services are provided for free by Facilities Management (FM) to all 'on-Grounds' departments or units. FM provides an overview presentation on the process for departmental staff and supplies the department with boxes for collection of both 'white' and 'mixed' paper disposal; boxes are replenished during the scheduled pick-up by FM. Upon pick-up, FM will 'reprocess' the mixed paper collected and dispose of the records in an enclosed, locked 40 cubic foot container. When this container has reached capacity, it is transported to *SONOCO Recycling* for compression and banding and sent to another plant where it is 'pulped' and recycled. At this time, this service is not offered to "off-Grounds" University departments.

Information Technology & Communication's (ITC) Current Retention of Electronic Data:
ITC manages the central servers holding the University's electronic data including email. ITC provides various options in the way of server space and data retention to individual University departments. ITC does not maintain long-term back-ups of departmental data housed on its servers; typically back-ups are held for no longer than six months and in some instances such as email, backups are held for only seven days. In its server and backup policies and practices, ITC does not purport to address state electronic records retention requirements. University policy establishes this as an individual and departmental responsibility at this time.

D. **Internal Benchmarking**
   Storage at Fontana: This warehouse, located on *Old Ivy Road*, is owned by the University but operated by Aramark and is divided into multiple sections with Aramark's large kitchen facilities and food storage occupying a major portion. The spaced not used by Aramark is sub-leased back to the University for various storage needs, including records storage. The warehouse has multiple entrances with no apparent building security mechanisms or access constraints and does not appear to have climate or other temperature controls.

   Storage areas are divided by wire enclosed cages with doors that are not always equipped with locks. A number of departments have leased such cages and placed records boxes there in large quantities most without any organization or structure—making retrieval difficult. The on-site visit revealed evidence of improper storage of confidential records and very poor conditions for records in general. Anecdotal information obtained from a few of the departments who have records stored at Fontana suggests that it has been used as a last resort for storage and that once records are placed there they are not regularly reviewed and destroyed as appropriate under state law.

   Storage at Ivy Stacks: Ivy Stacks, located on *Old Ivy Road,* is a permanent records facility for the University Library's permanent holdings and University archives. This building was visited to provide team members who did not travel to Virginia Tech with a sense of what a similar climate-controlled organized storage facility looks like. Ivy Stacks is full and does not have space for additional records storage but serves as an example of systematic records storage.

   Medical Records Management: The School of Medicine (SOM) differs from the other units because of its research-intensive environment, large number of externally funded grants and contracts, and the conduct of studies involving research subjects and animals. The SOM faculty have complex interactions both clinically and through research with the Medical Center, which operates as a separate agency and has a separate records manager. This arrangement is somewhat problematic in that many records are shared between the Medical Center and the SOM. Specific records management challenges for the SOM include:
   - Research record retention under U.Va. policy;
   - Protection of electronic data in SOM departments and centers;
   - Retention of grant and contract records;

- Retention of records and intellectual property issues; and,
- Retention of clinical research records (e. g. security and confidentiality of centrally stored records; FDA confidentiality requirements, Institutional Review Board regulations).

During this study it was determined that the SOM had completed a recent examination of SOM records retention issues. Their findings were first issued December, 2006, and reissued April, 2007. Core recommendations from that separate study correlate with the overall findings and recommendations of this effort. The SOM reports that the recommendations made as a result of its internal review have not been implemented at this time.

E. **External Benchmarking**
State Institution Records Management Programs: Because every state records program must be approved and aligned with the LVA regulations, other in-state institutions were benchmarked to determine best practices and to gauge the reporting structure, staffing, and resources provided. A summary of findings follow:

Institution	Reporting Unit	Number of Staff	Facility	Software
Virginia Tech	Transportation & Parking/Facilities Management	3 Full-time staff 3 Part-time students <300 department records coordinators	140,000 square foot, high density storage facility; approximately 20,000 linear feet of shelving is used for records storage.	Utilize GAIN Records Management software system also currently in use at the State Records facility.
JMU	University Advancement	2 Full-time staff	No storage facility	Not used
GMU	University Library	1 Full-time staff and a half-time student	University Records Center - 5000 cubic feet of inactive university records storage.	Not used
ODU	VP for Administration & Finance	1 Part-time staff	Informal warehouse Program is decentralized.	Not used
VCU	Technology Services/CIO	1 Full-time staff	No storage. Utilizes State Library.	Not used
William & Mary	Library	1 Full-time staff (archivist)	No storage.	Not used

Site Visit to Virginia Tech (VT): VT has a records management program that is considered a national best-in-class program. It is a central but distributed model. The institution has a central Records Manager but distributes the responsibility of records management throughout the institution. Each administrative and academic unit (>300 separate entities) has a formally appointed and trained records coordinator and a records official (dean or designee) to collaborate with the University-wide Records Manager. Significant findings from this site visit include:

- VT's dedicated records-management facility provides storage, document retrieval, and outreach and ancillary services at no direct departmental cost. This is an effective tool in promoting records management practices.
- VT's program is dependent on a strong and consistent message from the President of the University that records management is a top priority.

- VT's program succeeds through exemplary customer service to the university and by offering key resources and services such as: training and outreach initiatives, web support, and translation of the arcane state records schedules.
- VT's success results in part through the designation of a trained and accountable records coordinator within each department/unit of the university.
- VT's program is based on a print paradigm of records management; therefore it represents the best of a paper-oriented records era.

Site Visit to Security Business Archives (SBA): SBA currently holds a contract with the University through agreements with the Medical Center and Darden. They offer secure, certified records storage services through their warehouse in Richmond. SBA handles records destruction schedules, certificates, and shredding/recycling services, and utilize records management software accessible via web interface to clients. Their fees per box are negotiable dependent upon volume, ranging between 20-25 cents per cubic foot box. Additional fees are incurred for pulling and re-shelving materials ($1.75/service). SBA will store data backup tapes and other electronic storage media but does not offer document imaging services.

The U.Va. Medical Center has essentially outsourced its records management to SBA. Patient records are scanned and paper versions are sent to SBA for permanent storage. SBA offers 24/7 records retrieval services which are very valuable to the Medical Center when original paper versions of clinical records are needed. This level of service is not available with the State Records Center, which is only open Monday-Friday.

The Library of Virginia Records Center: The Library of Virginia operates a Records Center in Richmond with 206,000 cubic feet of climate-controlled storage space. The center accepts records for storage from all state and local public entities and currently has over 100,000 cubic feet of available space. Records are logged in with the appropriate state public records codes and schedule information in the GAIN software system. The Center's services include retrieving and re-filing records, and destroying records on appropriate schedules established by the state. They do not offer document imaging services. The Center charges a monthly fee of 27 cents per cubic foot box. Thus, the cost to house 1000 boxes would be $3,240 a year. In contrast to its commercial competitors, the Center does not charge for ancillary services and for most short or long-term storage, it represents a very real and cost effective option for records that need not be held in Charlottesville. The Center also has processing space for records that are not yet organized, shredding, preservation, and recycling services. The Center has offered extraordinary flexibility in working with the University to accommodate needs for space to process papers and records. Center staff are willing to come to the University to train staff in records management, help to assess records storage issues, and provide other services.

The Library of Virginia/State Records Center is pursuing a state-wide contract with IBM for a document imaging and records destruction software system, which state agencies will be able to utilize. This program offers specialized imaging and records retention/destruction services exceeding those available from the Image Now software utilized at U.Va. This option would require further investigation to determine if it would meet U.Va.'s needs.

F. **Software and Electronic Records Management Needs**
    Records management software is used to manage paper records, whereas document imaging software is used to convert paper records to an electronic format. The two do not need to be compatible and can operate as separate systems.

- **Records Management Software:** Records management software is typically supplied by the warehouse providing the storage service and utilized by a records custodian to manage physical systems. If U.Va. sends records to the State Records Center or to SBA, our materials will be logged into a records management system utilized by the vendor. Records sent for storage by department owners must have a procedure in place to itemize the documents in the boxes. Only if U.Va. decided to build or renovate a central records management facility for records storage would it be necessary to purchase a records management software system.

- **Imaging:** The University has had a site license for the documenting imaging software, ImageNow since 2003. Additionally, the Student Systems Project has incorporated this software as an integral part of the student system. The ImageNow electronic document management system is currently used in Arts & Sciences for faculty records, classified staff records, undergraduate and graduate enrolled student records, and graduate admission records. It is also used in the Provost Office, Student Financial Services, Curry School of Education, School of Nursing, Medical School, SCPS, etc.

  U.Va. has 648 licensed seats for ImageNow on Grounds. The current version of ImageNow is customized by each department to fit their document storage/retrieval needs. At present there are limited options for "tagging" records for an appropriate destruction date. The newly released version of ImageNow (Sunflower) will expand the number of indexed fields and add other traditional document management features to add security and allow for easier management of a document's lifecycle.

IV. Core Findings & Recommendations for Discussion

A. **Core Study Results:** The University does not have a well-functioning records management program at the present time and this is resulting in a waste of human and financial resources. The University is spending a considerable amount of money on disorganized, de facto records management activities. The University's current efforts are not producing results that are fully compliant with state records requirements as to either paper or electronic records. The University is not taking advantage of potential savings and efficiencies via electronic records management. Departments retain paper records that should be destroyed under state law or fail to properly document the destruction of records according to state law, thus exposing the University to legal risks and liabilities. With less than one-half FTE dedicated to records management, and little effective training, web services or outreach activities, the current formal program is underfinanced in human capital and other resources.

B. **Recommendations:** The recommendations put forth will improve the efficiency and effectiveness of the University's records management program. The recommendations are summarized below and address four main areas: programming; resources; storage; and reporting oversight.

  Key Program Elements: Indispensable elements of an effective records management program include a person or persons who can:
- Assimilate and translate complex state statutory and administrative regulations;
- Support University-wide compliance with state law;
- Effectively communicate and train departmental records managers across the institution;
- Offer outstanding customer service skills;
- Provide excellent web and technology capabilities to the program;
- Organize procurement of needed space and software that meets the needs of University units and departments;

- Offer meaningful incentives to participation; overcome financial obstacles to participation; and,
- Network with records managers at other state universities to develop best practices for academic institutions.

Records Management Resources: A full-time, experienced, professional Records Officer/Manager for Agency 207 should be recruited and appointed. This individual should be located within an existing unit or area with shared administrative, technology, and other support services. Given the current state of records management, it is advised that the need for additional resources and/or staffing should be re-examined after a full-time records manager has an opportunity to further assess the current state and future needs.

Additionally, the Medical Center should be asked to fund a full-time Records Officer who can address special record challenges surrounding patient care affecting the Medical Center (Agency 209) and the Medical School (Agency 207). This individual should collaborate closely on training, outreach, program development, and other activities with the Agency 207 Records Officer to avoid duplication of efforts and maximize available resources.

Storage: The exact scope of local records storage needs is unclear. While it appears that many University records are being stored in either on-grounds or off grounds facilities, it remains unknown how many of those records need to be stored permanently, for a short term, or may be overdue for destruction. It is likely, however, that some secure nearby space is needed for short-term storage of paper records. Use of the State Records Center or SBA for records that do not need to be locally accessible would present a cost-effective option for records on a schedule with a specific destruction date.

In an emerging era of electronic records, construction of a dedicated records warehouse facility akin to Virginia Tech's is not recommended. The State Records Center and the private company Security Business Archives, both in Richmond, are cost-effective, safe, secure, records-compliant options for all records that are not needed on a frequent basis. The University should not invest substantially to create local space to house records that can be maintained more cost-effectively at one of these existing facilities. Some local space is needed to house records that are needed by departments on an on-going basis. This space would not need to meet strict climate control and other archival requirements. It appears likely a small portion of the area currently being used for substandard records storage at Fontana could be renovated to address this local need.

Reporting Structure: Potential reporting options for a comprehensive records management function are many, and a successful, high-functioning program could reside in any one of these areas. Each of these potential areas has advantages and disadvantages. Some important issues to consider when evaluating placement of this function include: the breadth of the unit's activities (administrative and academic); compatibility of records management with the unit's mission; customer service orientation; regulatory or compliance role; and resources for supplemental support (i.e. technology, general administration, etc.). Options considered by the team include:

- **Executive Vice President and Provost:** *University Library*. Benchmarking results on state institutions showed that 33% have the records management function report to the University Library. Records management is inherent to U.Va. Library's responsibility for permanent University archives and historical records. The additional functions of short-term record retention and destruction, however, are incompatible with the Library's mission. Also, the Library has no regulatory or compliance mandate at the University and no administrative role that spans the entire institution. It is recommended that the Library **should** remain responsible for all University

permanent archival (historical) records, but **should not** remain in charge of the state mandated records management program.

- **Vice President for Management and Budget:** *Procurement Services or Facilities Management* These areas exhibit organizational characteristics conducive for a successful records management program. Procurement Services was identified as a potential owner due to its customer service orientation, training and outreach efforts, management of websites as a communication tool, and compliance role with state law. Facilities Management (FM) is where Virginia Tech's program reports, and FM at U.Va. is already responsible for the records management related functions of recycling and disposal of paper documents.

- **Vice President and Chief Information Officer:** *Security and Policy Office*. This area also exemplifies qualities suitable for a records management function through its role of educating the University community about federal and state privacy, copyright, and other laws; its delivery of web-based and in-person training; and its location within the part of the University best suited to rigorously vet options for an e-records focused program. *The team strongly recommends this be a considered option.*

- **Vice President and Chief Financial Officer:** *Financial Administration or Business Operations* Both of these areas interface with all parts of the institution and are customer-focused in their operations. While Financial Administration has a strong compliance orientation, its efforts are primarily focused on financial matters. While Business Operations is a service-based area, it has a dual mission of revenue generation. This revenue emphasis may be at odds and actually hinder the facilitation of a successful records management program. *The team strongly recommends Financial Administration be a considered option.*

V. Conclusion

Achieving a fully-compliant and systematic records management program will take time and will clearly need to be conceived as a phased process over a period of years. Bringing in a professionally trained full-time records manager will be crucial to the reform effort. With proper training and guidance by the Records Officer, the University can implement a distributed program in which departments and units assume primary responsibility for records management compliance. Better adherence to destruction regulations and schedules will reduce the institution's need for storage space. Nonetheless, some cost-effective, organized, short-term and long-term document storage space will likely be needed but can be adequately provided through a combination of on-site and off-site storage.