

Records and Information  
Management Services  
(RIMS) Task Force

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Final Report

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December 9, 2010

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**Table of Contents**

- A. EXECUTIVE SUMMARY ..... 3
- B. INTRODUCTION ..... 5
- C. METHODOLOGY ..... 6
- D. CURRENT STATE OF RECORDS AND INFORMATION MANAGEMENT ..... 6
- E. KEY BENEFITS OF RECORDS AND INFORMATION MANAGEMENT ..... 7
  - 1. Protect Vital University Records ..... 7
  - 2. Limit the University’s Legal Liability..... 7
  - 3. Identify and Preserve Historic Records..... 8
  - 4. Promote Scholarship and Teaching Excellence ..... 8
  - 5. Improve Operational Efficiencies..... 8
  - 6. Improve Response to Information Requests ..... 8
- F. CHALLENGES FOR RECORDS AND INFORMATION MANAGEMENT ..... 8
  - 1. Difficulty Defining a Record ..... 9
  - 2. Shifts in Business Processes and Content..... 9
  - 3. Increasing Requests for Information ..... 9
  - 4. Diffuse Policies and Lines of Responsibility ..... 9
  - 5. Diverse and Disparate Systems..... 10
  - 6. Unit-based Records Schedules..... 10
  - 7. Outdated State Administrative Rules and Laws ..... 11
  - 8. An Institutional Culture of Non-coordination..... 11
- G. RECOMMENDATIONS ..... 11
  - 1. Establish and Fund a Records and Information Management Program ..... 11
  - 2. Establish Records and Information Management Policies and Procedures..... 13
  - 3. Establish RIMS Governance Structure ..... 14

4. Update Rules and Laws Related to Records and Information Management .... 14

H. CONCLUSION ..... 15

APPENDIX A: TASK FORCE MEMBERS ..... 16

APPENDIX B: DEFINITIONS ..... 17

APPENDIX C: RECORDS DISPOSITION PROCESS ..... 19

APPENDIX D: POLICIES RELATED TO RECORDS AND INFORMATION MANAGEMENT ..... 20

APPENDIX E: ELECTRONIC MAIL RETENTION POLICY - DRAFT ..... 22

APPENDIX F: PROPOSED CHANGE FOR JOINT COMMITTEE ADMINISTRATIVE RULES ..... 23

APPENDIX G: PROPOSED GOVERNANCE STRUCTURE..... 24

## **A. EXECUTIVE SUMMARY**

The University of Illinois delivers world-class education, research, and service. The current economic climate for sustaining higher education excellence demands that the University use innovative administrative models that both enable efficient business practices for our employees and increase transparency for our constituents. As we focus on the delivery of higher quality instruction and research that competes in a global market, nearly every aspect of supporting and engaging in higher education involves the creation and exchange of electronic information. At the same time, paper documents continue to permeate common business processes and workflows, rendering a hybrid environment of electronic and analog-based systems. It is critical that the University provide an effective and coordinated approach to managing its records and administrative information assets and systems. To this end, the University must develop a program that effectively delivers a broad range of Records and Information Management Services (RIMS). These services should be based on the commonly accepted concept of shared administrative services with flexibility to support unique campus-specific or even college-specific services where appropriate.

Issues related to the management of data, records, and information resources continue to grow and are shared across all campuses, schools and university-wide departments and offices. Legislation is burdensome, all forms of records have proliferated, and public scrutiny has grown. Key challenges and issues include:

- building collaborative strategies within an institutional culture of autonomy
- defining and managing official records in a technology centric and data intensive environment
- addressing Freedom of Information Act requests and litigation discovery obligations
- remediating diffuse practices for the development of compliance policies and procedures related to the management of records and information resources
- clarifying responsibilities for the management of records and information resources
- working with increasingly diverse and disparate systems and data formats, and
- navigating bureaucratic records management laws and regulations

Despite these challenges and issues, the University has not changed its administrative practices, nor has it hired or assigned resources specifically devoted to developing sustainable practices for managing records and information resources. All efforts have been made on a part-time basis and independently across the institution, focusing solely on the disposal component of records management, without consideration of the benefits that could be gained by managing records and information resources in a more coordinated manner.

As a result, the University is behind our peers and we risk losing further ground on managing our own information assets, which is a detriment to both the academic and administrative functions of the University.

To address these challenges and issues, we therefore recommend that resources be designated to support a coordinated approach for the management of record and information assets to realize the following benefits:

- Protect vital University records
- Limit the University's legal liability
- Support preservation of historic records
- Facilitate scholarship and teaching excellence
- Improve operational efficiencies
- Increase the efficiency of responses to requests for information

To achieve these benefits we recommend that the University:

1. Fund a University program to provide Records and Information Management Services (RIMS)
2. Establish a RIMS governance structure including RIMS managers, a RIMS administrator, advisory committee, collaborative participation of functional and technical experts on an as-needed basis, and oversight by a top level University executive
3. Work with State officials to update relevant rules, laws, and procedures to meet modern business dependencies on electronic information systems

## B. INTRODUCTION

In February, 2010, the University's administrative leadership approved creation of a Records and Information Management Services (RIMS) task force. The purpose of the RIMS task force is to recommend a structure to deliver a set of services across the University that will:

- support the development and maintenance of policies related to the management of data records and information resources created or received in the course of transacting the business functions of the University
- provide assistance related to the management of these data, records, and information resources
- ensure the capture, preservation, and future accessibility of data, records, and information resources of enduring value

The task force also identified the following objectives:

- identify issues related to the management of data, records, and information resources
- set and prioritize goals for a RIMS program, including the creation of policies, whether by the taskforce or other bodies
- determine the services needed to achieve the goals
- propose a structure for the program
- document resources needed for the program
- create a final recommendation for the University's administrative leadership

Managing the records and information resources of a large and complex university is one of the most significant administrative challenges facing the University of Illinois today. The administrative environment has quickly moved from one using centralized management techniques to one that provides a nearly infinite degree of choice to units or individuals regarding how records and other information resources are managed and shared. At the same time, the ease with which duplicate copies of files and aggregations of data can be generated has created a seemingly endless increase in the amount of information the University must manage. This increasing store of information coupled with an ad hoc distributed model for its management has compounded the difficult task of effectively managing records and information resources for the University. Further difficulties are presented to the University with the increasing expectations of transparency in the governance of state institutions.

The University needs a coordinated approach to the management of its records and other information resources. This goal can be achieved through the implementation of a records and information management program working in close coordination across the campuses and key units of the University. A records and information management program can provide much needed guidance in identifying, protecting, and providing access to essential business records while assisting in the elimination of records and other information resources no longer needed for operational, financial, legal, or historical purposes.

## C. METHODOLOGY

The task force first met in March, 2010. Meetings were initially scheduled as video conferences bringing all members together for discussions and assignment of individual activities. These meetings shifted into bi-weekly meetings in July to facilitate more in-person communications. Task force members researched, reviewed and shared various records and information foundational resources and international standards, including: information from the Sedona Conference<sup>1</sup>, the ISO 15489 standard on records and information management, Model Requirements for the Management of Electronic Records<sup>2</sup>, the e-mail policy of the Illinois Secretary of State's office, the Illinois State Records Act<sup>3</sup>, the Illinois Joint Committee on Administrative Rules<sup>4</sup>, and records and information management programs and practices from several other institutions of higher education. The task force established a common glossary of terms, identified policies across the institution related to records and information resources, and shared information from other University initiatives such as the Urbana Electronic Communications working group and the similarly charged UIC Records Management task force. There was cross-task force participation and this report is informed deeply by the work of the UIC Records Management task force.

## D. CURRENT STATE OF RECORDS AND INFORMATION MANAGEMENT

As a state institution (agency), the University must comply with laws related to records, including the Electronic Commerce Security Act, the Illinois State Records Act and the Freedom of Information Act. With respect to the Illinois State Records Act, each state agency is expected to establish and operate an efficient program for the management of its records. One component of an efficient program is the proper disposal of state records. Disposing of state records without following rules put forth by the State Records Commission has been designated a Class 4 felony punishable by up to 3 years in prison.

The University of Illinois *General Rules* provides some direction regarding records and information management by declaring that no University records may be destroyed without prior approval by the campus archivists. Under the General Rules, each campus archivist is responsible for approving disposal of their respective campus' records and the Urbana archivist is responsible for the same for University of Illinois administration (UA) records. Because the archivists' primary responsibilities involve managing the University's records of enduring value

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<sup>1</sup> The Sedona Conference <http://www.thesedonaconference.org/>

<sup>2</sup> Model Requirements for the Management of Electronic Records  
[http://www.dlmforum.eu/index.php?option=com\\_content&view=category&layout=blog&id=901&Itemid=20&lang=en](http://www.dlmforum.eu/index.php?option=com_content&view=category&layout=blog&id=901&Itemid=20&lang=en)

<sup>3</sup> The Illinois State Records Act  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=86&ChapAct=5%20ILCS%20160/&ChapterID=2&ChapterName=GENERAL+PROVISIONS&ActName=State+Records+Act>

<sup>4</sup> The Joint Committee on Administrative Rules <http://www.ilga.gov/commission/jcar/>

and assisting researchers in their use, only limited time has been available to maintain an active focus on this records disposal process. Furthermore, records destruction is only one component of a records and information management program. Common components of a program to meet University of Illinois' needs would include:

- providing guidance on identification and management of records including vital records;
- coordinating the process of records disposal according to the requirements of the State of Illinois
- providing guidance and coordination for document imaging activities
- recommending improvements in workflow related to the management of records and other information resources
- offering ongoing training and support to units in the management of records and information resources
- coordinating with other stakeholders in areas such as: data security and privacy; requests for information; the management of electronic communications; and data storage and records storage

## **E. KEY BENEFITS OF RECORDS AND INFORMATION MANAGEMENT**

An effective records and information management program can help provide more efficient and reliable administrative support to the University. Such a program would also help to protect vital University records, limit legal liability, support the preservation of historic records, promote scholarship and teaching excellence, improve operational efficiencies, and increase efficiency in responding to requests for information.

### **1. Protect Vital University Records**

Vital records are those considered crucial to the ongoing operation of the University and must be well-managed and kept safe from unintentional loss. A top priority for a records and information management program is to identify vital records and to ensure that they are being properly managed and retained by establishing disaster and recovery plans.

### **2. Limit the University's Legal Liability**

The 2006 changes to the Federal Rules for Civil Procedure make "Electronically Stored Information" open to discovery in the case of litigation. Courts have imposed large sanctions on public and private enterprises for failing to provide requested information in a timely manner. A records and information management program would provide approved procedures and best practices for the destruction of records and non-records, thereby reducing the amount of materials to review in the case of requests for information as part of legal discovery procedures.

### **3. Identify and Preserve Historic Records**

A records and information management program would permit records of enduring historical value to be consistently identified and transferred to the University Archives. Documentation of important decisions plays a key role in knowledge management and ensures that the institutional memory of the University does not leave with the departure of key faculty and staff.

### **4. Promote Scholarship and Teaching Excellence**

Coordination and collaboration in records and information management can bring opportunities to support the creation and management of data used for research and teaching. This in turn can enhance faculty collaborations aimed at modernizing curriculum development and increasing research funding. Current efforts to develop trustworthy digital repositories for digital scholarship and archival records are underway or being planned within the University's libraries and archives and campus computing groups. Systematic methods for managing and capturing electronic records can in turn feed these digital repositories with content from operational systems.

### **5. Improve Operational Efficiencies**

Coordinating services related to document imaging and document and data storage can result in operational efficiencies by securing more competitive pricing for vendor-provided services. Other operational efficiencies can be achieved by prioritizing collaborative efforts to better utilize existing University assets and expertise. Establishing a program to efficiently deliver records and information management services can also minimize unnecessary redundancy in records disposal processes and ensure that all information resources are disposed of or archived when no longer needed.

### **6. Improve Response to Information Requests**

An effective program for delivering Records and Information Management Services would support the routine organization of information resources thereby improving methods by which the University responds to requests for information.

## **F. CHALLENGES FOR RECORDS AND INFORMATION MANAGEMENT**

Challenges related to the management of data, records, and information resources are shared across all campuses, colleges, schools, institutes and university-wide departments and offices. For this reason, we present here a list of challenges initially identified by the UIC Records Management Task Force which we believe are equally relevant to the entire institution. We have taken liberties to modify the descriptions of these issues where necessary to provide more clarity or broader applicability to the University as a whole.

## **1. Difficulty Defining a Record**

Foundational to establishing an effective system for managing records and other information resources is answering the question, “What is a record?” Answering that question, however, is not as straightforward as one might initially think. Records are defined in the context of the business of the institution and are not bound by form or format. Records are a subset of all information resources created, received, used, or disseminated by the University. The complex and evolving university environment makes it difficult to develop a simple and universal definition of a record. And yet, to comply with laws and regulations requiring specified periods of retention for particular types of records, it is important to have a definition that can be broadly applied throughout all University of Illinois units and offices.

## **2. Shifts in Business Processes and Content**

The ways in which University business is conducted today is hardly recognizable as compared to practices used by our predecessors in the middle 1900s. Prior to the proliferation of computing and communications systems, business processes and transactions were all paper-based. In a paper-based environment, controls over the flow of data and information are clearer and specific outputs of business processes can be treated as authoritative representations of official transactions and decisions. In a paper-based environment, official transactions and decisions have discrete boundaries thereby rendering easier identification of records. However, with the increasing use of interdependent electronic systems for the conduct of business, it is necessary to have up-front records and information management planning to ensure that systems create and maintain usable records for as long as they are needed.

## **3. Increasing Requests for Information**

Requests for information through the Freedom of Information Act (FOIA) and through common discovery procedures can confuse units regarding what documentation needs to be retained and how that documentation should be made available. Whether or not the documentation or information resources are considered official records does not matter in the case of these requests. But if confusion persists regarding the distinction between records and non-records, and in determining who or what unit is responsible for managing records, non-essential and duplicated information will be retained longer than necessary, or deleted prematurely. Either case can increase the costs and efforts required to respond effectively to FOIA and discovery requests.

## **4. Diffuse Policies and Lines of Responsibility**

The lack of comprehensive records management policies across the University has created an organization where responsibility for records is diffuse. Without administrative direction, the individual employee is prone to make decisions on their own regarding how long and in what manner they will maintain the information resources they create and use. An organizational culture has thus developed in which employees view themselves as owners rather than stewards of the University’s information resources be they records or non-records. This culture

should not be surprising in an environment that does not provide clear policies for the management of these resources.

Without clear policies two extreme approaches to managing information resources often occur. At one extreme, employees may unnecessarily retain all records and non-records in all versions. This practice creates a strain on resources by using physical space to house filing cabinets and boxes of documents that might otherwise be better deployed to support critical business processes. Retaining all records and non-records in all versions, even in electronic formats, creates a strain on IT staff and resources to manage and back up the resulting increased number of duplicative electronic documents. At the other extreme, employees may dispose of their records as soon as possible once they believe they personally no longer have need for them. This practice may result in the loss of critical records that document or support University operations.

## **5. Diverse and Disparate Systems**

The advent of the Internet has resulted in a proliferation of diverse and disparate systems that have changed the shape, method, and context of communication. Any system being used as a method of communication can result in a form of information exchange that can constitute a record (e.g., a webpage, a video, a podcast). E-mail is the most ubiquitous of these systems that have affected the work environment. Official correspondence and companion documents that in the past would have found their way to physical filing systems now sit in electronic in-boxes or in folders on individual employees' desks. With little to no guidance, file names, storage methods, and retention periods of electronic documents and official communications are idiosyncratic.

Trends in communications technologies have led to expectations of anytime, anywhere connectivity and multiple, simultaneous access methods; social networking, on-line discussion forums, courseware, blogs and wikis all encourage individuals to document all aspects of their lives, while also allowing those in their network (or even outside of their network) to comment on the updates. This communication environment creates a continuous flow of information often managed by systems outside the University environment. University information systems, whether managed within or outside the University environment, must adhere to the University's records retention and archiving policies.

## **6. Unit-based Records Schedules**

In the past, all three campuses have utilized a process of supporting records disposal that involves units working with their respective campus archivists to inventory and create lists of records they create and receive in the course of conducting business. This process requires each unit to have an individual plan that addresses all record types held, even though many of the records units are holding duplicate records and record types held elsewhere. To increase operational efficiencies, improve compliance with the requirements of the Illinois State Records Act, and avoid unnecessary variations in retention periods, "general" records retention

schedules for common records found across the institution should be developed. Meanwhile, since some units create and use unique records not existing in any other unit, maintaining a unit-level approach will still be needed.

## **7. Outdated State Administrative Rules and Laws**

The ability of the University to take advantage of evolving records and information technology is hampered by state regulation. For example, in relation to the Illinois State Records Act, the Joint Committee on Administrative Rules has issued a rule stating that digitized images of records cannot be used in place of a paper or a micrographic image unless the retention requirement for the record is less than ten years. While the likely spirit of transparency and accountability is commendable, the practicality of following the rule creates undue, and likely unforeseen, costs to the State because the rule necessitates microfilming or retaining paper documents even after they have been digitally imaged successfully. These added costs offset other measures the University is taking to reduce costs.

It should be noted that while there remain outdated records and information management rules and laws that present challenges to compliance, in July 2010 the Government Electronic Records Act<sup>5</sup> was signed into law, providing an opportunity for the University to steer the development of recommendations regarding the management of electronic records.

## **8. An Institutional Culture of Non-coordination**

The University does not have an established practice of coordinating the management of records and information resources across the institution. With administrative matters, a culture that encourages coordination would provide for a more effective and efficient use of resources and offer more effective and efficient support. But the current culture of the University often reinforces autonomy and individualized solutions rather than coordination and shared solutions. Any shift in culture toward one of more coordination will take time and will be met with varying degrees of resistance. It will be important to include a change management component in the transformation of process and procedures regarding records and information management.

## **G. RECOMMENDATIONS**

### **1. Establish and Fund a Records and Information Management Program**

Effective management of records and information resources is vital to the long term health of the University. It is imperative that the University establish and provide sufficient funding to

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<sup>5</sup> Illinois Government Electronic Records Act: <http://www.ilga.gov/legislation/publicacts/fulltext.asp?Name=096-1363&GA=96> The University of Illinois President or designee has been named as a member of a Board charged with making formal recommendations for the management of electronic records.

develop the necessary policies, services and practices to implement a program that will successfully provide records and information management services.

In all cases, some services may operate via a cost-recovery model, for example by providing localized assistance with training, records inventorying and coordination of records disposal and file storage.

A RIMS program should collaborate with stakeholders to develop coordinated strategies, workflows and services to address the following areas:

- a) Retention and Disposal of Records
  - i. Creating and submitting State-required documentation related to records disposition
  - ii. Developing General Records Schedules for the University where appropriate
  - iii. Developing Unit-level Retention Schedules where necessary
  - iv. Developing mechanisms for unit-level submission of requests for records disposal or transfer to Archives
  - v. Providing guidance on destruction (deletion) of electronic documents
  - vi. Coordinating hardcopy destruction of records and non-records
  
- b) Storage of Records and Non-records (of temporary value)
  - i. Providing guidance on e-copy storage of records and non-records
  - ii. Providing guidance and coordination on hardcopy storage of records and non-records
  - iii. Coordinating and assisting in developing mechanisms for transfer of records out of operational systems into record-keeping systems
  
- c) Storage of Records of Enduring Value
  - i. Coordinating and assisting in the development of mechanisms for transfer of records out of record-keeping systems into archival systems
  - ii. Coordinating the transfer of historically valuable records, electronic and hardcopy, to University Archives
  
- d) Records and Information Management Projects and Activities
  - i. Providing support for records and data inventory projects
  - ii. Developing plans to protect vital records
  - iii. Setting standards and assisting in the coordination of services related to managing records, documents, and data by participating in the development of RFPs and Preferred Customer designations

- iv. Assisting in maximizing efficient use of Banner, the Data Warehouse, home-grown systems, and vendor-supported systems, while reducing operating costs
  - v. Assisting in ensuring data security and integrity
  - vi. Assisting in providing guidance on the use of electronic communications
  - vii. Assisting in providing guidance on the appropriate use of document imaging and meeting requirements for digital surrogates
- e) Training and Education
    - i. Developing and delivering ongoing training related to all aspects of managing records and information resources
    - ii. Developing and promulgating guidelines and best practices for e-mail management, document creation, file sharing, and information organization
  - f) Policy development and distribution
    - i. Developing and coordinating policy development and distribution related to managing records and information resources

## **2. Establish Records and Information Management Policies and Procedures**

The task force recommends the University create a coordinated approach to developing and implementing policies and procedures related to records management specifically, and information management more generally. The following is a list of identified areas where such policies are presently absent or in need of coordination across the institution:

- a) Managing and disposing of information resources considered to be records and non-records, including electronic formats (also includes concerns of data security, data loss, information security, responding to e-discovery, responding to FOIA)
- b) Managing e-mail and other personal electronic communications (clarify personal versus institutional data, especially data that may reside on personal devices - see Appendix E for a draft electronic mail retention policy)
- c) Managing web publishing and other institutional communications
- d) Information management standards/guidelines/best practices for:
  - i. Paper-based and born-digital resources
  - ii. Deploying new technologies

### **3. Establish RIMS Governance Structure**

The effective delivery of records management services will require a strong collaborative effort that is mindful of our distributed environment. For this reason, we recommend the following governance structure:

- a) A top-level University Executive charged with approving strategies and policies related to the management of records and information resources
- b) A RIMS Administrator to oversee all RIMS Managers and ensure coordination of services
- c) Four RIMS Managers, each primarily responsible for a particular campus and for the University Administration
- d) Archivists and Functional and Technical Experts, working in concert with the RIMS managers across the institution to create and sustain shared services and a collaborative working environment regarding records, and
- e) A RIMS policy advisory committee to assist the RIMS administrator and RIMS managers in developing strategies, policies and procedures as needed

Institutional funding will be required to hire the four RIMS Managers and to support a RIMS Administrator including some level of support for operations, policy development and oversight, research, and general administration.

Records and Information Management Services should be developed across the institution through intentional collaboration and a focus on cost-savings that can be accomplished through sharing services wherever possible. A successful program will create a flexible work environment by using functional and technical experts and existing resources on an as-needed basis to leverage in-house expertise and previously established services.

Historically, the archivists across the University have played a key role in identifying records of enduring value. Within this proposed structure, the archivists remain essential in identifying, securing, and suggesting methods for preserving and managing records of enduring value.

### **4. Update Rules and Laws Related to Records and Information Management**

The standard operating procedures of twenty-first century organizations are assumed to use electronic information systems. Therefore it is imperative that electronic records are addressed as part of a records management program. It is also essential that the University work with state legislators and the State Records Commission to introduce administrative rules that can

effectively guide the work of the University toward better transparency and accountability in an efficient and practical manner.

A particularly good opportunity for working on records management policy with key State officials exists through the recently enacted Illinois Government Electronic Records Act. This Act has charged an Electronic Records Advisory Board with making formal recommendations related to the use and retention of electronic records by July 1, 2011. There are to be no less than four meetings of this Board during the fiscal year. The University of Illinois President or designee (currently Michael Hites) is a member of the Board along with the Governor, Treasurer, Secretary of State, Attorney General, Comptroller, Director of Central Management Services, Director of the Bureau of Communication and Computer Services within CMS, Director of the Illinois State Archives, and the Secretary of Transportation, or their designees. Information from this Task Force and related campus groups should be made available to the President or designee for use as he or she sees fit.

See Appendix G for a specific recommendation related to the replacement of a current ruling by the Joint Committee on Administrative Rules. The current ruling requires continued maintenance in paper or microfilm form in certain cases, regardless of whether they have been digitally stored per accepted business practice.

## **H. CONCLUSION**

Ten years into the twenty-first century the University of Illinois is poised to make significant changes in administrative operations that, if well-executed, will benefit the overall mission of the institution. A Records and Information Management Services program is essential to ensuring that maximum efficiencies are achieved by the ongoing changes in business and administrative operations. By coordinating these services and eliminating redundancies, an effective program will reduce costs, expand the delivery of services, meet legal and operational obligations, and minimize risks of data loss and legal liabilities. The Task Force is available should there be any questions.

## **APPENDIX A: TASK FORCE MEMBERS**

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Thomas Wood, UIS Archives

## APPENDIX B: DEFINITIONS

**Document:** Recorded information (or object) which can be treated as a unit. (definition provided by ISO 15489.1)

**Information System:** Any system used to create or manage information resources - both records and non-records.

**Non-Records:** **1.** Material not filed as evidence of administrative activity, or for its informational content, and not needed for documentary purposes. **2.** Material used to facilitate operations but not to support, enable, or document administrative action. **3.** Material created and preserved only for reference convenience and requiring no administrative action. **4.** Duplicates of materials when the originals of those materials are stored and maintained as records.

### **Note: Non-records may still be valuable**

Documents may be non-records and still be highly valuable and vital to the workflow of many units. Documents that are non-records may still be expected to be kept for a specific period of time to facilitate future business processes. (For example, some units may want to have ready access to reference copies of contracts for use when drafting new contracts for similar goods and services.) For this reason departments may establish a practice of retaining non-record documents for a specified period of time similarly to how retention periods for records are established.

### **Non-records with limited value**

Some non-record documents will have very short term value and can be discarded at the discretion of each individual or unit when they are no longer needed for personal reference.

*Examples of documents as non-records with limited value may include the following:*

- *Drafts of reports, documents, or files*
- *Reference copies of reports, documents or files*
- *Stocks of printed or reproduced documents kept for supply purposes*
- *Day-to-day correspondence (setting meeting times, providing casual feedback, etc.)*
- *Test versions of software and datasets*
- *Vendor catalogs and promotional materials*

**Office of Record:** Office of Record conveys the responsibility of ownership for University records and can be assigned to an individual, a unit, or a department. The Office of Record for a particular set of records has primary responsibility for ensuring those records are securely retained for as long as required and are subsequently disposed of or transferred for permanent

retention according to the expectations set forth by University policies and standard procedures. For instance, when departments or individuals communicate via e-mail messages in the course of conducting University business, unless otherwise delegated, the sending party is considered the Office of Record for their sent e-mail messages and any attachments or files pointed to via embedded links. For example, if the Parking Division sends a general announcement of changes in times for the enforcement of meters via an e-mail message to the entire University or campus community, it is assumed the Parking Division will keep the official record of the message and the recipients may discard the message when it is no longer needed.

**Records:** Records include all documents, regardless of physical form or characteristics, produced or received by any agent or employee of the University in the transaction of University business and bearing upon the activities and functions of the University.

*Examples of documents that are University Records may include the following:*

- *Meeting minutes, correspondence and memoranda*
- *Financial records, such as general ledgers, purchase orders, and grants and sponsored research documentation*
- *Published materials, including reports and newsletters*
- *Videos and photographs (film and digital)*
- *Sound recordings (tape and digital)*
- *Drawings and maps*
- *Computer data or other machine readable electronic records, including electronic mail*

## **APPENDIX C: RECORDS DISPOSITION PROCESS**

Below are the basic steps a unit must currently follow to dispose of University records:

### ***Create a Records Disposal Authorization***

Before disposing of any University record a Records Disposal Authorization (RDA) must be approved and on file with the State Records Commission (SRC). The current process used by the University of Illinois involves creating RDAs for specific units. If an appropriate RDA does not exist, units must contact the Archivist. The process of creating and obtaining approval for an RDA can take from three months to over a year, with most taking closer to a year from initial inventory to final approval by the State Records Commission.

### ***Identify Records to Dispose***

Units must identify and organize sets of records according to the list of records described in an approved RDA. Each set of records must include the following information:

- RDA item number
- RDA record series title
- Inclusive dates
- Description of the form, content, and function of the records
- Quantity of records (in cubic ft)

### ***Submit the Records Disposal Certificate***

Units currently have two options for submitting a Records Disposal Certificate (RDC), which is a paper form requiring wet signature. An RDC may be directly submitted to the staff of the SRC or may be submitted through the campus Archivist. In the first case no review by the Archivist takes place and the form goes directly to the staff of the SRC. In the second case the Archivist reviews the RDC and forwards it on to the staff of the SRC for consideration. In both cases, approved or rejected RDC forms are returned to the Archivist. The Archivist will contact units once the form has been returned. If the form is rejected, a new one can be submitted. (Denial of requests is usually due to filling out the form wrong, listing date ranges that are not yet eligible for disposal, or not listing records clearly by type of records.) Units cannot dispose of records prior to the Archivist receiving written approval from the SRC. Approval or rejection of the RDC may take from two weeks to two months with a usual time of three weeks. No records may be disposed of sooner than thirty days after the date of signature on the RDC from the Archivist or from the unit requesting permission to destroy the records.

### ***Dispose Properly***

Units are responsible for disposal of records noted on the approved RDC by the method indicated on the RDA. Special attention must be given to records containing sensitive or personally identifying information by using secure recycling or shredding/pulping services. The date and method of disposal should be recorded by the unit.

## **APPENDIX D: POLICIES RELATED TO RECORDS AND INFORMATION MANAGEMENT**

Following is a non-exhaustive list of policies and their current web addresses at the University of Illinois that are relevant to various records and information management issues. The policies originate from University Administration (UA) and the campuses (Urbana, UIC and UIS).

### **Archival Policies**

1. <http://www.uillinois.edu/trustees/rules.cfm#sec64> – UA General Rules Article VI, Section 4 on University Archives.
2. <http://www.library.illinois.edu/archives/about/docpol.php> - UA and Urbana Archives Documentation Policy – Implementation of General Rules
3. <https://services.ideals.illinois.edu/wiki/bin/view/IDEALS/IDEALSDigitalPreservationPolicy> - Digital Preservation Policy for the Urbana institutional repository, IDEALS.

### **State of Illinois FOIA**

1. <http://publicaffairs.illinois.edu/media/foia/index.html> - Urbana Procedure on filing and responding to State of Illinois FOIAs.
2. [http://www.uic.edu/index.html/admin\\_FOIA.shtml](http://www.uic.edu/index.html/admin_FOIA.shtml) - UIC Procedure on filing and responding to State of Illinois FOIAs.
3. <http://www.uis.edu/campusrelations/> - UIS Procedure on filing and responding to State of Illinois FOIAs.

### **Data Security, Data Loss, Information Security**

1. <http://www.obfs.uillinois.edu/cms/one.aspx?portalId=909965&pageId=914038> UA Info Security Policy – OBFS Manual Section 19.5.
2. <http://www.fs.uiuc.edu/cam/cam/viii/viii-1.2.html> - Urbana Info Security Policy mirroring UA Info Security Policy – CAM VIII-1.2.
3. <http://www.ncsa.illinois.edu/UserInfo/Security/policy/> - NCSA Security Policies – Implements the UA and campus Info Security Policies.
4. <http://www.ssn.uillinois.edu/> - UA SSN Policy.
5. <http://www.obfs.uillinois.edu/cms/one.aspx?portalId=909965&pageId=914031> – OBFS Manual 19.2 on UA SSN Policy.
6. [http://www.aitis.uillinois.edu/it\\_policies/social\\_security\\_number\\_guidelines/](http://www.aitis.uillinois.edu/it_policies/social_security_number_guidelines/) - AITS SSN Guidelines.
7. <http://www.cites.illinois.edu/ssnprogram/index.html> - Urbana SSN Remediation Program.
8. <http://www.cio.illinois.edu/policies/pipa/index.html> Urbana Guide to the State of Illinois Personal Information Protection Act.

### **Web Publishing - Copyright policies (useful re what can go up or be taken down):**

1. <http://www.uillinois.edu/trustees/rules.cfm#sec34> – UA General Rules, Article III, Section 4 on copyright.

2. <http://www.uillinois.edu/our/photos.cfm> -- UA site on available photo resources.
3. <http://www.cio.illinois.edu/policies/copyright/index.html> - Urbana copyright collection with references to internal & external sites. Some links are now dead.
4. <http://publicaffairs.illinois.edu/resources/forms.html> - Urbana model (template) release forms.
5. [http://www.library.illinois.edu/administration/services/policies/electro\\_reserve.html](http://www.library.illinois.edu/administration/services/policies/electro_reserve.html) - Urbana Library Practices for Electronic Reserves.
6. <http://cas.illinois.edu/events/ViewPublicEvent.aspx?Guid=1C832E45-A9F2-43FD-BCCC-241A578B3F0B> – Urbana Center for Advanced Study 10/29/2009 streaming seminar by Kenneth Crews, Columbia University, on Who Owns Your Scholarship: Copyright, Publication Agreements and Good Practice.

**Web Publishing - Computer use policies (useful re what can go up or be taken down):**

1. [http://www.vpaa.uillinois.edu/Policies/web\\_privacy.cfm](http://www.vpaa.uillinois.edu/Policies/web_privacy.cfm) - UA Web Privacy Notice that applies to all domains within the University Web.
2. [http://www.obfs.uillinois.edu/bfpp/section\\_19\\_business\\_technology\\_and\\_systems/section\\_19\\_1/](http://www.obfs.uillinois.edu/bfpp/section_19_business_technology_and_systems/section_19_1/) - UA Publishing on the Internet Policy in OBFS Manual 19.1 links to the official Publishing on the Internet Policy maintained by the VPAA.
3. [https://nessie.uihr.uillinois.edu/cf/policies/index.cfm?Item\\_id=3894](https://nessie.uihr.uillinois.edu/cf/policies/index.cfm?Item_id=3894) – UA computer appropriate use policy.
4. <http://www.aits.uillinois.edu/cms/One.aspx?portalId=909813&pageId=910170> – AITS computer policies including link to UA computer appropriate use policy and campuses' computer policies.
5. <http://www.cio.illinois.edu/policies/index.html> -- Urbana computer policies including appropriate use.
6. <http://www.uic.edu/depts/accp/policies/> - UIC computer policies including appropriate use.
7. <http://www.uis.edu/its/about/policies.html> - UIS computer policies including appropriate use.

**Web Publishing - Trademark Policies (useful re what can go up or be taken down)**

1. <http://www.uillinois.edu/our/style/> - UA style guide with links to the 3 campus' style guides plus links to UIC's and UIS' logo guides.
2. <http://www.fs.uiuc.edu/CAM/CAM/iii/iii-21.html> - Urbana Guidelines for Sponsorships and Ads – CAM III-21.

## **APPENDIX E: ELECTRONIC MAIL RETENTION POLICY - DRAFT**

Electronic mail (e-mail) messages transmitted or received via computer access provided by the University of Illinois or on behalf of University employees are generally considered the University's property. E-mail messages that are considered records of the University are subject to management guidelines under the University's records management function as mandated by the State Records Act (5 ILCS 160).

Employees have the same responsibilities in managing e-mail message records as they have in managing records that are in paper, microfilm, or other non-e-mail digital file formats. Employees must distinguish between record and non-record e-mails and determine who has management responsibilities (office of record<sup>6</sup>) for their e-mail messages.

E-mail messages that are considered records must be routinely stored outside of an e-mail system in a manner that provides appropriate security and assurances of authenticity and a reasonable mechanism for applying appropriate records retention schedules to them so they may be appropriately destroyed or transferred to the University Archives.

Non-record e-mail messages shall be disposed of immediately after their use is complete.

All e-mail messages that are considered records that are stored outside an e-mail system must contain the full content of the message, a listing of all recipients, the sender, subject line, and date sent and should be properly preserved and disposed of as specified by the University's records retention requirements.

Regular system backups of e-mail do not constitute, nor should they be used as, a record-keeping system. Backups should be used for business continuity rather than records retention.

Legal Counsel shall specify the period of retention for all legal holds placed on e-mail messages that may be required in the case of pending litigation or court orders.

For assistance with the retention and/or disposal of any records, employees should contact their departmental records officer or campus Records and Information Management Services (RIMS) manager.

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<sup>6</sup> See APPENDIX C - DEFINITIONS<sup>7</sup> Joint Committee Administrative Rules – Digital Surrogates  
<http://www.ilga.gov/commission/jcar/admincode/044/04404400000700R.html>

## **APPENDIX F: PROPOSED CHANGE FOR JOINT COMMITTEE ADMINISTRATIVE RULES**

One recommendation for improving expectations of transparency and accountability for state agencies would be for the State to replace the current Joint Committee on Administrative Rules ruling requiring original records to be either maintained in paper format or microfilmed if they are required for more than ten years<sup>7</sup>, regardless of whether or not they are scanned and stored in an image repository as part of a business process. A new rule might state that all agencies are expected to produce proof of appropriate policies and procedures related to using document imaging as part of their business processes and proof of trustworthy electronic repositories for storing the images for long-term use, but once such proof has been produced, the original records may be discarded. The expectation would be that internal auditors would routinely provide assurances of compliance for these systems and agencies could then destroy original records once their digital surrogates and the systems used to manage them have been verified.

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<sup>7</sup> Joint Committee Administrative Rules – Digital Surrogates  
<http://www.ilga.gov/commission/jcar/admincode/044/04404400000700R.html>

**APPENDIX G: PROPOSED GOVERNANCE STRUCTURE**

