

Records Management Plan for River Park University

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River Park University is at a pivotal moment in its organizational development. To best address the issues threatening the long-term health of the university, we must build an information governance program from the foundations. There are short term solutions we can implement to bridge the gap for the most emergent problems, but my recommendation begins with advocating for a comprehensive program and strategic plan. Otherwise, we risk spending so much time putting out small fires that we never get the chance to build something stable and secure. In the following document, I will lay out plans for the first 60 days, 120 days, and the first year. Please see Appendix A for the proposed schedule. Though aggressive, following this plan will lay the groundwork for a records management plan that will see River Park University into a strong, organized future.

60 Days

I propose beginning the program with an initial assessment of River Park University's records management program as it currently stands. The Principles Maturity Model offers one way to analyze the current program. Because there is no formal RM/IG program at RPU, and the only defined policy is an "ad hoc" email deletion policy, I would assess the current program at a Level 1. "In Level 1, which is considered substandard, recordkeeping issues are addressed in a minimal, ad hoc manner, if they are addressed at all" (Saffady, 2021, p. 24). Time permitting within the first two weeks, I would analyze improvement areas for each of the Generally Accepted Recordkeeping Principles and develop a Risk Profile to identify the key problem areas and their urgencies to prioritize for the year ahead.

Using the first two weeks to write up these analytical assessments also allows me the chance to begin familiarizing myself with the RPU program units and their primary contacts.

Heading into the third and fourth weeks, I would use the contacts I've made to begin forming the advisory committee for overseeing the records management program. First, we need an Executive Sponsor, and I would propose Dr. Turner for the role. "An executive must be on board and supporting the effort in order to garner the resources needed to develop and execute the strategic plan, and that executive must be held accountable for the development and execution of the plan" (Smallwood, 2020, p. 69). The Board of Trustees have already indicated their support, but having a formal statement of executive oversight will help keep the entire organization accountable for implementing this program.

Following the selection of the Executive Sponsor, I would assemble an Advisory Committee from the relevant departments. While the Information Technology department and the University Archives and Special Collections department are both already pledged to collaborate, there may be other key figures from additional departments who may contribute important feedback. "Advisory committee members typically include representatives of organizational units that have a strong interest in systematic recordkeeping or are responsible for mission-critical business operations" (Saffady, 2021, p. 21). The Advisory Committee could either meet monthly or at specific milestones in the program's development, such as to approve policy proposals and confirm major purchases.

Week Five will be devoted to writing the records management policy that will govern the entire company going forward. While it does not need to be a long or complex document, it needs to be legally sound and in line with the university's overall policies. The policy should define official vs. unofficial records, and gesture towards the Retention Schedule and legal hold procedure that will be further developed in the coming months. With the approval of the newly formed Advisory Committee and any additional legal assessment made over the next week as

available, we would lock in the policy by week six. Distributing the policy via the usual channels could be immediate, from the office of the Executive Sponsor, or it could wait for the records inventory kick-off meeting I intend to hold in a few weeks.

Before we move on to starting the Records Inventory, there are three immediate issues which must be addressed by the end of Week Six, if not sooner. The first is that the HR Department has effectively frozen all hiring at the Loop Campus due to concerns about paperwork being lost in transit from the Loop Campus to the main campus. This not only disadvantages the Loop Campus from hiring new employees but also feeds into the appearance that the Loop Campus is secondary to the main campus. As a result, we need to figure out a way to ease the Director of Human Resource's fears and resume employee processing at the Loop Campus as soon as possible. I see two potential solutions: we could hire a document courier service with certain guarantees of secure transfer to replace the student workers currently performing transfers, or we could purchase the appropriate document scanners to facilitate a digital transfer of paperwork between campuses. The latter option does risk creating digital records before we've built the infrastructure to secure them, especially when they may include sensitive personal information. But as a stop-gap measure, it may be faster to implement than finding, evaluating, and securing a courier service that we can trust. The Advisory Committee could advise on which option they prefer, and I would perform the necessary research to choose either a courier service or a document scanner (and appropriate initial IT infrastructure).

The second immediate issue is the CIO's ultimatum that five departments must delete 30 GB of file storage by the end of 60 days or face arbitrary deletion. For obvious reasons, we cannot allow files to be arbitrarily deleted before they've been inventoried and assessed for legal retention. I expect the CIO will be a member of the Advisory Committee, and hopefully through

that process he would understand the value of the program we are implementing and the methodical approach we are taking, and he would be willing to hold off on his ultimatum in return. As part of this conversation, I would suggest that we begin our records inventory with these five departments to accelerate the process of clearing up their file storage. Including the CIO in the Advisory Committee would give him a sense of authority and investment in the process to come, and I hope it would address many of his concerns.

The third and final immediate issue is the email deletion policy. A blanket deletion at 90 days is not an unreasonable policy; it is actually common practice. “E-mail retention periods can vary from 90 days to as long as seven years” (Smallwood, 2020, p. 199). But because it is causing considerable controversy and it is leading to unsafe records management behaviors in various departments, including paper copies of emails and duplicate downloads, it should be paused while we perform the inventory. I propose temporarily moving the email deletion date to six months, as is also common for a blanket policy, and this should hopefully reduce the urgency that leads employees to save personal copies of email threads.

While there are several other important issues to address, they are not as urgent and can wait until the formal records management program is under way to inform and enforce the policies. For example, the Financial Aid department will need a conversation about keeping duplicate records. If they cannot be reassured that by the end of this process there will be a much smoother procedure for interdepartmental access, then the Executive Sponsor may be needed to impress upon them the importance of maintaining current filing procedures. This moment is where the RM/IG Policy we crafted will be important to reinforce accountability.

With the remaining two weeks of the first 60 days, the focus must be entirely on beginning the Records Inventory process. Some tasks may have begun before, such as the hiring

process for an administrative assistant, student interns, and the assessment of the organizational chart. Because of the enormity of the task and the aggressive timeline, we may need to begin with specific program units and rotate our focus over time. I would propose beginning with Admissions, Financial Aid, Human Resources, and Accounts Payable. If any of the five departments that the CIO is concerned about are not listed here, they would be added. Finally, the ten departments with risky basement storage are a concern, but the immediate threat of deleted files from the five departments is more likely than flooding, so according to risk assessment we will have to prioritize the digital files at risk. I would ask River Park University for an organizational chart and identify the primary contacts for the chosen program units. Though it took several weeks to get here and it may look like not much progress has been made, we have laid the groundwork for the rest of the year ahead. Because now the real work begins.

120 Days

After a Kick-Off Meeting where the Executive Sponsor can introduce the RM/IG Policy and its implications, we would begin the records inventory period. Based on the size of an organization, scheduling interviews for all program units can take months, if not years. We are focusing on a narrow list of program units, and I suggest a mixed-mode model that combines initial surveys followed up by in-person interviews. Student interns would assist with organizing survey results and transcribing interviews from my initial documentation into the appropriate survey instrument. The final product would create a structured list of records for these program units. I have designated three weeks for the survey period and three weeks for scheduling interviews, but this is a part of the process which can easily eat up more time based on survey responsiveness and interviewee scheduling conflicts.

While the interview process is ongoing, I would begin a more direct analysis of the boxes stored in the basements of the various departments. With the help of student workers, we would categorize and label boxes appropriately. The goal would be to align the stored paper records with the ongoing records inventory, though based on scheduling one may predate the other. Depending on the condition of these storage boxes and the organization (or lack thereof) of the records within, this process could be beyond the capabilities and time of our student interns. The goal would be to identify the records into general categories and prepare them for off-site storage or disposition as confidently as possible.

The Records Inventory will be an ongoing process as further program units are selected, but the goal is to develop a Retention Schedule within the first 120 days, so we must move aggressively to make these strides. Based on the initial results of the inventory developed in the first six weeks, I would begin crafting the Retention Schedule following legal guidelines. The key steps of this process include inventorying the records, determining “the period of time the records are needed for conducting... operations and meeting legal obligations,” and “draft[ing] disposition instructions” (Smallwood, 2020, p. 194). Developing retention criteria depends on assessing legal considerations such as those in the Code of Federal Regulations and provided by professional organizations such as the American Association of Collegiate Registrars and Admissions Officers.

Following the above research, I would draft a Retention Schedule to be cleared by the Advisory Committee and the Legal Department of RPU. Part of the Retention Schedule is to identify official copies of all records. This would be especially important for communicating with Financial Aid, and all departments that save emails or duplicate records. The Retention Schedule may take several weeks to draft and approve, but completing this schedule will form

the foundation for the rest of our decisions. Though the 120 days were primarily preoccupied with the inventory and the Retention Schedule, we are now able to take the developed schedule and begin to implement actual changes to records management at RPU. The rest of the year will see a lot of changes for employees, and it will be the Executive Sponsor who will help ease the way and advocate for change. Once all is complete, everyone will see how much easier their daily workflow has become.

One Year

Over the last 120 days, we have laid the groundwork; now we can begin to make the necessary changes to improve RPU's workflow. The next step is to begin working with the paper records stored in the basements on the main campus. Based on the student interns' work, we should have a rough idea of which records can be disposed of based on our Retention Schedule, and which we will need to store (and for how long). We will begin by double-checking that certain records can indeed be destroyed, and then confirm with a disposal certificate verified by the legal department. That should narrow down the list of boxes that need to be stored.

Then we will need to select an off-site records storage center. "A records center is a low-cost centralized area for housing and servicing inactive records whose reference rate does not warrant their retention in a prime office area" (Read & Ginn, 2018, p. 163). I will supply a list of possible vendors to the Advisory Committee and make my recommendations. A proper off-site storage center will provide digitization services that can help reduce our paper storage overall, which will also hopefully ease the minds of those handing over paper files to our off-site center. I will make a schedule for file transfer by department, beginning with the program units we have already inventoried. The student interns can assist with preparing the files for physical transfer, while some centers will offer pick-up and data entry processes.

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With the paper records in the process of being transferred, we must turn to the digital records. There are those we already have (and which the CIO has already identified as filling up our storage), and those which will be created as we continue to digitize processes throughout the university. The first step will be to consider an Enterprise Content Management System to organize and secure our files. “An ECM application creates and maintains one or more searchable repositories that combine topical folders with in-depth indexing for organization and retrieval of digital content” (Saffady, 2021, p. 192). This system will also be responsible for long-term digital preservation of our files, by selecting common file formats and remaining as technology neutral as possible.

First, I propose beginning with accession of records from the five departments identified as a problem by the CIO. By using the Retention Schedule to determine which records can be deleted, and which can be archived appropriately, we can free up the storage space that concerned the CIO. We will then apply the same system to the other program units we have inventoried. Part of this process will involve creating digital processes for scanning paper files and using the ECM system for sharing digital records – for example, a digital system for HR onboarding on both campuses could be set up. We could also address the concerns of the Accounts Payable Office, currently drowning in paperwork for each check request. By creating a digital process for check requests and providing all departments with scanners in order to digitize paperwork, we can expedite these procedures and make them easier to manage and store. The cost of a comprehensive ECM system and the scanners will take a considerable portion of the allocated budget, but they will return their worth in efficiency many times over.

In addition to the ECM system, we will also need to select an email archival system. This may be part of the ECM system, but it is a distinct process from a simple back-up. “Backups are

huge dumps to mass storage, where the data is stored sequentially and not compressed or indexed” (Smallwood, 2020, p. 289). Choosing and implementing an email archive will help preserve the necessary records needed from employee emails, and it may also help ease their concerns about losing access to important emails.

Implementing these software programs, both in configuring their settings, converting and transferring files, and training employees on their usage, would take up much of the following months. Guided by the Advisory Committee and in collaboration with HR, developing a training program to implement these new digital processes throughout the relevant program units would be key to the success of this program. “All employees will require a basic understanding of the organization’s records management policies and retention schedule at a level sufficient to implement prescribed retention periods for records in their custody” (Saffady, 2021, pp. 103-104). I propose designating at least two months to schedule the various meetings and develop metrics and incentives to encourage participation.

As employees are being trained, I would also continue to address several of the other issues raised by our initial meetings. Developing a risk management plan for natural disasters and other risks would be vital. “A disaster recovery plan is a written and approved course of action to take when disaster strikes, ensuring an organization’s ability to respond to an interruption in services by restoring critical business functions” (Read & Ginn, 2018, p. 371). Learning to perform risk assessment and developing Disaster Plans for relevant scenarios would be an ongoing process, but I would begin at this time to consider the most likely risks.

The next issue to address is the Archives and Special Collections department and their lack of artifacts. This has not been an urgent issue and so is left for nearly the end of the year, but it is important to the university to preserve their history. As we performed the records inventory,

we may have uncovered some historical documents to transfer to the ASC. Part of the process now would be assisting them with developing digital preservation metadata in order to properly organize and store these archival items long term. The ASC staff should have the expertise to do so themselves, but any assistance in what metadata to include from a digital records perspective, I would be happy to provide.

Finally, we will want to set up monitoring and auditing programs to oversee the maintenance of the records management program we have put in place. The goal is one of continuous improvement, as technology changes and new record series are added to the inventories. We will need to work with HR to determine how often employees should complete refresher trainings. We will also need to figure out how often to audit our record inventories, so that we can strike a balance between keeping up with any changes in the program units and not overwhelming the departments with constant requests for information. The long-term health of the program depends on a solid plan for maintaining the organization we have achieved.

To wrap up this first year, I would assess our program once again, using the maturity model as well as various metrics we have established to analyze our progress to date. This data can be presented to the board in July 2023 to advocate for the success of our program, and the need for continued investment in our goals.

From here, we will need to continue the records inventory to additional program units, as well as evaluating future considerations: policies for instant messaging, social media, and mobile devices. Not to mention emerging technologies and the constant small fires which are a hallmark of any organization's daily operations. But with the board's approval of the progress we have made in this first year, we should have ample time and opportunity to build a records management program that can handle all challenges for years to come.

References

Read, J., & Ginn, M. L. (2016). *Records management* (Tenth edition). Cengage Learning.

Saffady, W. (2021). *Records and information management: Fundamentals of professional practice* (Fourth edition). Rowman & Littlefield.

Smallwood, R. F. (2020). *Information governance: Concepts, strategies, and best practices* (Second edition). Wiley.

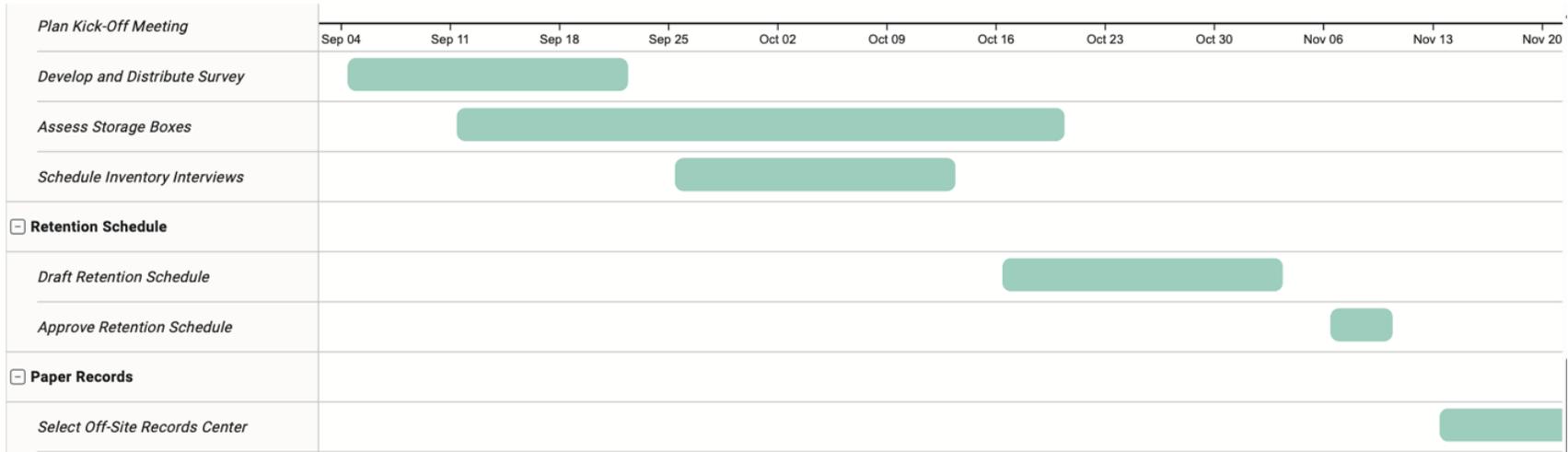
Appendix A

Records Management Project Schedule 2022-2023

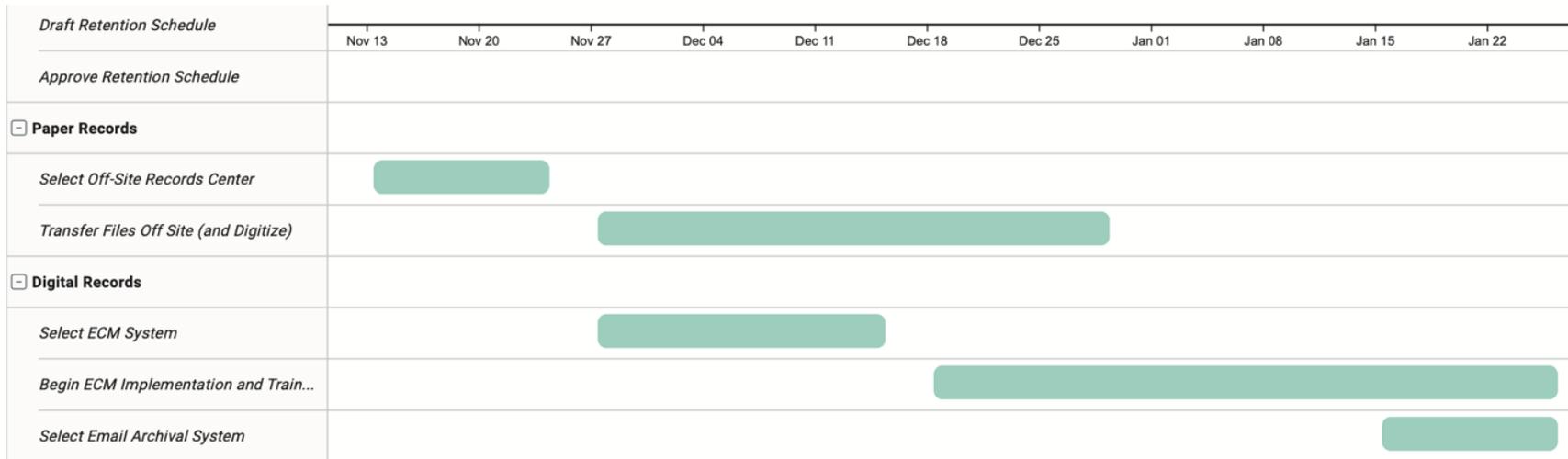


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Records Management Project Schedule 2022-2023



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Records Management Project Schedule 2022-2023

	Jan 29	Feb 05	Feb 12	Feb 19	Feb 26	Mar 05	Mar 12	Mar 19	Mar 26	Apr 02	Apr 09	Apr 16
<i>Draft Retention Schedule</i>												
<i>Approve Retention Schedule</i>												
<input type="checkbox"/> Paper Records												
<i>Select Off-Site Records Center</i>												
<i>Transfer Files Off Site (and Digitize)</i>												
<input type="checkbox"/> Digital Records												
<i>Select ECM System</i>												
<i>Begin ECM Implementation and Train...</i>												
<i>Select Email Archival System</i>												
<i>Implement Email Archival System</i>												
<input type="checkbox"/> Training and Maintenance												
<i>Employee Training Program</i>												
<i>Perform Risk Assessment</i>												
<i>Develop Disaster Plans</i>												

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