2018

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

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IN ACTION

Phrase
▪ In operation; working.

INACTION

Noun
▪ Lack of action where some is expected or appropriate.

*Oxford Living Dictionaries*, Retrieved 16 April 2018
SOME CONTEXT

KAREN WALTON MORSE
Director of Distinctive* Collections, University of Rhode Island

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

Exhibit 2.0., FEA Records Management Profile, v.1(2015), emphasis mine
PUBLIC R1 UNIVERSITY, 2003-2011

My role
• Processing archivist

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

NOT-FOR-PROFIT MUSEUM, 2011-2017

My role
Manager of Library and Archival Services
• head of museum library
• museum archivist
• *de facto* records administrator

State of Records Management
• Document retention and destruction policy adopted in 2010 (updated c. 2014)

**PUBLIC R2 UNIVERSITY, 2017-**

**My role**

Director of Distinctive Collections
- head of special collections
- *de facto* university archivist

**State of Records Management**

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

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

UNIV. ARCHIVES MISSION

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

last updated 2014, emphasis mine
UNIVERSITY ARCHIVES RECORDS
AUTHORITY STATEMENT, N.D.

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

Leads into the University Archives Mission Statement

n.b. no guidance about disposition

snippets, emphasis mine

POLICY REGARDING ACCEPTING MATERIALS INTO THE ARCHIVES

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

last updated 2014, emphasis mine

RETROSPECTIVE APPRAISAL
TOWARD A FINAL, FINAL DISPOSITION

GUIDELINES FOR REAPPRAISAL AND DEACCESSIONING

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

Society of American Archivists, 2012 (emphasis mine)
38-1-10. Disposal of records.— No public official may mutilate, destroy, sell, loan, or otherwise dispose of any public record without the consent of the public records administration program of the secretary of state.

Public record(s):
all documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, magnetic or other tapes, electronic data processing records, computer stored data […] or other material regardless of physical form or characteristics made or received pursuant to law or ordinance or in connection with the official business by any agency. (§38-2-2 (4)(i))
TAKE 2

INVOKE THE PROFESSIONALS

Records retention schedules for Higher Education now forthcoming
Timeline: ?

INVESTIGATE GENERAL AND EXTRA-AGENCY SCHEDULES
TESTING THE WATERS

Considerations:

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

EXAMPLE 1: OVERSIZE REPORTS

Extent: 2.5 linear feet
Ledger size printouts
Loose and not part of any collection
No apparent accession records
Report: Enrollment counts by sex as of 15 Oct 1982

**REAPPRAISAL: OVERSIZE REPORTS (1)**

**Questions**

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

**Answers**

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

↑ **SAA Guidelines for Reappraisal and Deaccessioning, 2012**
Reappraisal: Oversize Reports (2)

Questions

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

Answers

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012

Oversize Reports, Disposition Of?

Existing Guidance re. Retention

No obvious exact match
- GRS5.9 – Daily Operations: Monthly, Quarterly, and Periodic Reports. Retain three (3) years.
- LG5.1.34 – Public Schools: Student Enrollment Records.
  - (a) Annual enrollment figures. Permanent.
  - (b) Periodic enrollment updates. Retain one (1) year.

Current Plan of Attack

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

Priority: low
EXAMPLE 2: GRADE ROSTERS

Extent: 56 linear feet

Accessioned

Additional similar collections in archives

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Final Grade Roster, 1990 (redacted)
REAPPRAISAL: GRADE ROSTERS (1)

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

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012

REAPPRAISAL: GRADE ROSTERS (2)

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

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012

GRADE ROSTERS, DISPOSITION OF?

Existing Guidance re. Retention
No obvious exact match, not even in Public Schools Agency Schedules.
- LG5.1.29 – Public Schools: Student Test Results. Retain until of no further administrative value.
- LG5.1.10 – Public Schools: Teachers’ Student Files. Retain until final grades and testing data posted.

Current Plan of Attack
- Annotate collecting policy: Transcripts accepted, grade rosters, grade change forms, etc. not accepted.
- Deaccession.
- Obtain authorization for destruction.
Priority: high

EXAMPLE 3: REGISTRAR’S CARD FILE
Extent: 8 cabinets
Student records
Unclear whether accessioned

Registrar’s Card File (redacted)
**REAPPRAISAL: REGISTRAR’S CARD FILE (1)**

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

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

[SAA Guidelines for Reappraisal and Deaccessioning, 2012](#)
REAPPRaisal: Registrar’s Card File (2)

Questions

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

Answers

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012

Registrar’s Card File, Disposition Of?

Existing Guidance re. Retention

No match; Public Schools Agency Schedules:

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

Current Plan of Attack

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

Priority: medium.
EXAMPLE 4: STUDENT RECORDS

Extent: 40.5 linear feet
Transcripts
[Partially?] converted
Accessioned

Student Records (redacted)

Current location of bulk of collection
REAPPRAISAL: STUDENT RECORDS (1)

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

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012

REAPPRAISAL: STUDENT RECORDS (2)

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

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

SAA Guidelines for Reappraisal and Deaccessioning, 2012
**STUDENT RECORDS, DISPOSITION OF?**

**Existing Guidance re. Retention**

- LGS. 1.1 – Public Schools: Student Record Folders
  - (a) Permanent Record Card. Permanent

- Rules and Regulations for the Making and Management of Imaged Public Records

- R.I. Gen. Laws § 38-3-5.1 (emphasis mine):
  - If any department [...] has caused any or all of the records to be recorded, copied, or reproduced by [...] any] process which accurately reproduces or forms a durable medium for reproducing the original, the original may be destroyed in the regular course of business, provided the process meets standards [...]  

**Current Plan of Attack**

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

Priority: medium

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**THANK YOU**

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