“Just the way we do business”: Records Management At Old Dominion University
What is Records Management?

Managing information in all its formats
- Physical (Paper, microfilm, audio and video tapes, photographs, etc.)
- Electronic (Shared drives, email, SharePoint, systems, etc.)

Ensuring that we get
- The right information
  - To the right person
  - At the right time
  - For the lowest possible cost
Why do we do this?

- **ODU Code of Ethics**
  - We will maintain the highest level of ethical standards, and **comply with all applicable State and Federal laws and regulations and University policies.**
  - We will **maintain and protect the confidentiality and security of information** entrusted to us by the University or its customers, except when disclosure is authorized or legally mandated.
  - We will **not use University funds, property, equipment, services, systems, information, time and effort or our position for personal gain.** We will protect the University's assets and resources and ensure their proper use by preventing theft, carelessness and waste. **We will promote efficient, effective and economical means of accomplishing tasks.**
Why do we do this?

- **ODU Code of Ethics**
  - We will not use University funds, property, equipment, services, systems, information, time and effort or our position for personal gain. We will protect the University's assets and resources and ensure their proper use by preventing theft, carelessness and waste. **We will promote efficient, effective and economical means of accomplishing tasks.**
  - We will adhere to the principle that the public's business should be conducted in the public view by observing and following the letter and spirit of the Virginia Freedom of Information Act.
  - We will comply with the University's accounting policies and procedures and maintain strong internal controls at all times. **We will not make any false or misleading entries in the University's records under any circumstances.**
Why do we need to do this?

- FERPA
- FCR Title IX
- HIPAA
- VPRA
- FOIA
- Security
- Privacy
- Personal Information
Why do we want to do this?

- Intellectual Capital
- Knowledge Management
- Added Intelligence
- Customer Service
- Optics
- Reputation
- Compliance
How do we do this?

- Develop a program that is low maintenance and highly participatory
- Appoint a Departmental Records Coordinator (DRC) for each department, sub-department, budget unit or office
- Train the DRCs in both the lifecycle of a record and the 6 core areas of activity (more on these later)
- Conduct periodic assessments
- Develop the University’s Records Management Program within existing policies and standards
A word about IT Policies and Standards

- ODU ITS policies and standards laid a solid foundation for Records & Information Management
- Definitions like “University Records”...directions on “ODU Regulated Data Storage”...“Mobile Device Management”...“Virtual Private Network” and more make it easy to develop best practices in Records & Information Management that are consistent with existing Policies and Standards
- The University Policy Review Committee has initiated the inclusion of retention information in all University policies as they are revised
What should you expect in a departmental records management program?

- Knowing what exactly defines a “record”
- Understanding the difference between active and inactive records
- Knowing where all your information is, and what to do with it
- Better, faster retrieval of information
- A greater level of expertise in Information Management
Goals

- Engage every business unit in managing its records and information
- Ensure compliance with all records-related requirements of all relevant state and federal legislation
- Assist departments in meeting the records-related requirements of all internal ODU policies, standards and guidelines
- Improve performance from “In Development” (GARP Maturity Model Level 2) to “Proactive” (GARP Maturity Model Level 4), leading to a Records Management Center of Excellence
- Provide significant long-term value to departments and the wider University Community
The Maturity Model goes beyond a mere restatement of the Principles, defining the characteristics of information governance programs at differing levels of maturity, completeness, and effectiveness. For each of the eight principles, the Maturity Model describes characteristics that are typical for its five levels of maturity:

- **LEVEL 1 (Sub-Standard):** This level describes an environment where information governance and recordkeeping concerns are not addressed at all, are addressed minimally, or are addressed in an ad hoc manner. Organizations that identify primarily with these descriptions should be concerned that their programs will not meet legal or regulatory scrutiny and may not effectively serve the business needs of the organization.

- **LEVEL 2 (In Development):** This level describes an environment where there is a developing recognition that information governance and prudent recordkeeping have an impact on the organization and that the organization may benefit from a more defined information governance program. However, in Level 2, the organization is still vulnerable to scrutiny of its legal or regulatory and business requirements because its practices are ill-defined, incomplete, nascent, or only marginally effective.

- **LEVEL 3 (Essential):** This level describes the essential, or minimum, requirements that must be addressed to meet the organization’s legal, regulatory, and business requirements. Level 3 is characterized by defined policies and procedures and the implementation of processes specifically intended to improve information governance and recordkeeping. Organizations that identify primarily with Level 3 descriptions still may be missing significant opportunities for streamlining business and controlling costs, but they have the key basic components of a sound program in place and are likely to be at least minimally compliant with legal, operational, and other responsibilities.

- **LEVEL 4 (Proactive):** This level describes an organization that has established a proactive information governance program throughout its operations and has established continuous improvement for it. Information governance issues and considerations are routinely integrated into business decisions. The organization is substantially more than minimally compliant with good practice and easily meets its legal and regulatory requirements. The entity that identifies primarily with these descriptions should begin to pursue the additional business and productivity benefits it could achieve by increasing enterprise-wide information availability, mining it for information for a better understanding of clients’ and customers’ needs, and otherwise transforming itself through increased use of its information.

- **LEVEL 5 (Transformational):** This level describes an organization that has integrated information governance into its overall corporate infrastructure and business processes to such an extent that compliance with program requirements and legal, regulatory, and other responsibilities are routine. This organization has recognized that effective information governance plays a critical role in cost containment, competitive advantage, and client service, and it has successfully implemented strategies and tools to achieve these gains on a plenary basis.

As a program progresses, the personnel charged with its management will likewise progress through a spectrum of increasing competence and effectiveness. At the transformational level, the information governance professional has a sophisticated skill set that encompasses a broad range of topics, including information theory and practice, technologies, and legal compliance.
From “In Development” to “Proactive”...

- Requires a new approach

- Breaking the records and information mountain into bit-sized chunks

- Direction, guidance, and assistance

- Commitment
Records Lifecycle

- Creation and receipt
- Distribution and use
- Storage and maintenance
- Disposition
Core Activities

- Inventory
- Transfers
- Destruction
- File Directory Structure
- Records Manual
- Training

Managing information feeds *Idea Fusion*.

Not managing information turns *Idea Fusion* into Idea Fission.
Steps

- Accept the fact that we need to improve in this area.
- Build the infrastructure to support an improved Records Management Program.
- Demonstrate the value and benefits of the approach.
- Repeat the methodology and core activities in all formats.
- Work with all ODU partners.
- Quantify maturity growth, looking to a Records Management Center of Excellence.
Anticipated Results

Core Activities –

- It will take the full five years to allow business units to become familiar with, and as important, comfortable with the core activities. At the end of that time, business units will have accomplished a great deal in the management of their information.

Legal Requirements –

- The completion of core activities will also lead to improved compliance and knowledge on records regulated by legislated requirements.
- Having the right amount of information – not too much or too little – and being able to respond to holds on destruction for litigation, audit, FOI, or other investigations

Results
Anticipated Results

Operating Efficiencies –

- When inactive records are separated from active files and transferred to appropriate storage, substantial space savings will occur.
- A smaller volume of active records to be searched for information retrieval means faster and more accurate search results.
- Understanding common methods for classifying, filing, retaining and disposing of records, non-records and reference materials across the University will increase efficiency at all levels.
- According to Iron Mountain, faculty and staff lose as much as ten hours per week searching for information; if all core activities are pursued effectively, it is possible that this number could be cut in half, meaning that 3,000 ODU employees would regain 5 hours per week – 15,000 additional hours of work per week could then be accomplished.
At the end of five years, the last year’s report should detail how far the University was able to progress in its Records Management activities and goals. It will clearly show how close Old Dominion University is to being a center of excellence in Records Management. But more than anything, it should report that when it comes to Records Management at ODU, it’s just the way we do business.
Ok that’s great... but what does it mean for Audit?

- Everything turns on an advanced concept of record/non-record and active/inactive status
- Imagine having a road map that pinpoints where records are, what their status is in terms of regulated information, and when they are slated for destruction or transfer to the University Archives...
## Records Locator Inventory Form (RM-20)

### Records Locator Inventory

<table>
<thead>
<tr>
<th>Department</th>
<th>Business Unit</th>
<th>Records Coordinator</th>
<th>Date Submitted</th>
<th>Record Schedule/ Series No.</th>
<th>Records Name/Description/Type</th>
<th>Location</th>
<th>Date Range</th>
<th>Format (e.g., Paper, Electronic, Microfilm)</th>
<th>Approx. Volume</th>
<th>Records (R) Non-Records (NR) or Reference (Ref)</th>
<th>Vital (V), Historical (H), HIPAA (HIP), or Personal Identifiers (PI)</th>
<th>Active (A), Inactive (I), or Mixed (M)</th>
<th>Retention Expiration Date (Year)</th>
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RM-20 ODU 12/30/2015
Data, Information, Record or Public Record?

- Virginia Public Records Act defines records and non-records
- All of our records are public records, subject to legislation and University policies, standards and guidelines – and this includes non-record duplicates
- It is the responsibility of the department or unit deal with:
  - the University Counsel Office for FOIA request and litigation holds;
  - Records Management for the authorized destruction of records
  - Audit for records concerning investigations
Records Transfer or Destruction

- When records transfers take place, a form is completed and signed by both the department and the new location - establishing a chain of custody

- Only when records are transferred to the University Archives does ownership change

- Three types of transfers:
  - Internal Storage (Facilities Management)
  - External Storage (Commercial Records Center)
  - University Archives
# Records Custody Transfer Form (ODU RM-1) Page 1

<table>
<thead>
<tr>
<th>Department</th>
<th>Business Unit</th>
<th>Records Coordinator</th>
<th>Date Submitted</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td>Inactive - Move to Fac Mgmt Records Storage</td>
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<td>Inactive - Move to Commercial Records Center</td>
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<td>Historical Records - Transfer to Univ Archives</td>
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<thead>
<tr>
<th>Record Schedule/Series No.</th>
<th>Records Name/Description/Type</th>
<th>Old Location</th>
<th>Date Range</th>
<th>Format (e.g., Paper, Electronic, Microfiche)</th>
<th>Approx. Volume</th>
<th>New Location</th>
<th>Destroy Date</th>
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</table>

**VERIFICATION OF CHAIN OF CUSTODY**

<table>
<thead>
<tr>
<th>Transferring Records Coordinator:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Records Management Approval:</td>
<td>Date:</td>
</tr>
<tr>
<td>Department Head:</td>
<td>Date:</td>
</tr>
<tr>
<td>New Custodian of Records:</td>
<td>Date:</td>
</tr>
</tbody>
</table>

Facilities Management Use Only: Work Order No.
Some Challenges in Managing Electronic Records - Unstructured Data

- One hypothetical department alone has 488 GB of data - information holdings - possible records - on its shared drive.
- With 405,279 files stored on this drive, and with a staff of 141, that looks like 2,874 documents per employee.
- 164,063 folders looks like 1,163 folders per employee.
- This 488 GB drive has information in a volume equivalent to 9,760 one cubic foot record boxes.
- At 1,000 boxes per trailer, this drive if paper would almost fill 10 semi-truck trailers.

That's how much information that has to be managed!!

For only one department!!!
Managing Electronic Records – Unstructured Data

- The information given is for one hypothetical department only.
- We are currently dealing with 62 departments, sub-departments, budget units and office and expect that number to hit at least 100 as departments within colleges come onboard with the program...
- If all of the units to be dealt with have 488 GB of data on their shared drives, we would have the equivalent of 976,000 one cubic foot records boxes to go through...
- ...and 976 semi truck trailers’ worth of information...
- Can you imagine the parking crisis???
- And this is all JUST data on shared drives....there’s more...
Managing Electronic Records - Unstructured Data

- That's why we want each department to develop a standard File Directory Structure - a taxonomy - so that these records are described at the folder level to allow for classification by the Library of Virginia records schedules.
- We need to determine which of these files are records and which are non-records; which are active and which are inactive.
- Then retention is established and an initial purge can take place.
- Imagine reducing those 10 semi-truck trailers to less than 5...
The problem with unstructured data is not storage costs – storage is relatively cheap.

One problem with unstructured data is just that – it has no structure – and information (data) is difficult to retrieve in a timely fashion.

Another problem with unstructured data is that the volume of information slows everything down – while storage may be cheap, excessive volume on servers makes everything run slower.

Unstructured data is not just on shared drives – there are hard drives, SharePoint sites, copies on hard drives and removable storage devices, phones, tablets.....
In our major University Records application (Banner), we have 14 years’ worth of data – deletion of data where the retention period has expired has not taken place.

Along side our 5 Year Plan, Records Management is classifying record (data) series according to the General Records Schedules promulgated by the Library of Virginia.

We will then inform data owners what data (records and non-records) is eligible for destruction.

Like unstructured data, excessive volumes of information (data) on systems makes everything run slower, so this purge will assist in improving efficient retrieval of information.
So why Records & Information Management for Higher Ed Auditors?

- Retrieval is an issue – how can we find things if we have a huge mountain of data to go through?
- Compliance is an issue – if you don’t follow the provisions of the Virginia Public Records Act, you are not following the law as it concerns public records in Virginia.
- Security is an issue – how can you protect regulated data if you don’t know what it is and where it is?
- Participation is an issue – all users, data owners and system owners need to manage the data they create, use, and store.
The Old Dominion Solution for Higher Ed Records & Information Management

- A plan that takes 5 years to implement – a measured approach
- Managing data through its lifecycle as a record
- Six core areas of activity
  - Inventories
  - Transfers
  - Destruction/deletion
  - File Directory Structure
  - Departmental Records Management Manual
  - Training
The Benefits of the ODU Approach to RIM for Higher Ed Auditors

- Passing the Audits and other investigations
- Creation and maintenance of records “audit trail”
- Faster, more accurate retrieval of data
- Reduction of risk by the timely and authorized disposition of regulated information and interruption of the same during investigations
- Constant communication on compliance
- Development of tools and best practices (E.g. File Directory Structures and Records Manuals) that provide desktop management of information and communication of requirements
- Using Records Management training to broadcast ITS standards, especially in the area of Information Security
- Contact across the University – “boots on the ground”
Questions?