Records Management at the University of Pittsburgh

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Introduction

University records management is sometimes an overlooked service in terms of administrative and operational effectiveness. Often construed in terms of "what can I keep?" or "what can I throw away?" the overall benefit to the efficiency and defensibility of the institution is underestimated. "Benefits of an effective records management program include legal protection, identification of important evidence, elimination of noncritical information, greater access to vital records, more efficient information storage and retrieval, and preservation of historical materials."[1] More than simply knowing what to throw away and what to keep, University records management services are defined by important legal, financial, operational, and historical factors.

The University Records Management Program at the University of Pittsburgh should stimulate an environment of openness, accountability, and transparency in order to promote information management integrity.[2] Academic research universities like the Pitt are generating information at a hereto unforeseen scale. General correspondence, admission and academic records, curriculum, financial records, general administrative records, grant and contract records, human resources, athletic certifications, alumni records, publications, and special programs and events are all record types the University generates to conduct daily business.

Hardcopy records exchanged by mail or delivery have evolved into a complex mix of paper and electronic records, scanned documents and those "born-digital," emails and instant messenger, databases and cloud-based storage systems. The result is an ever-growing network of information to navigate and manage requiring financial and staff resources, education and awareness, infrastructure adjustments, and changes in recordkeeping culture.

To best meet the needs of modern recordkeeping the University of Pittsburgh should reevaluate its records management strategy to be sure a positive, trustworthy, and pro-active approach is employed. Records may bring national attention to a University, for better or for worse, in the same way the success or failure of a research initiative or athletic program would. In many cases Universities are forced into a reactive position concerning records, scrambling to address policy gaps, structural deficiencies, or ineffective communication. Such position weakens the University's records management defensibility. A pro-active approach serves to embolden records facilitators across campus and strengthen the institutional foundation of the University.

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[1] Purcell, Aaron D. *Academic Archives: Managing the Next Generation of College and University Archives, Records, and Special Collections*. Chicago Illinois: Neal-Schuman, 2012. Pg. 121.

[2] "The overall purpose of having a records management program, for both paper and digital records, is to support and enhance the activities of the organization" Purcell, Pg. 121.

That foundation should be built on transparency, efficiency, and defensibility. As a state-related institution the University of Pittsburgh is not subject to the degree of open records requests that other large public universities are legally beholden to. However, this does not preclude Pitt from maintaining a comparable level of policy and diligence concerning its records in order to comply with best practices and maintain trustworthy and defensible policies.

This paper will detail how the University of Pittsburgh will benefit from a reexamination of its records management services and activities by describing the history of records management at the University of Pittsburgh, surveying selected records management services at comparable universities, presenting examples of higher education recordkeeping in the news, addressing the defensibility of current records management procedures at Pitt, and presenting several strategic and aspirational recommendations the University can pursue.

Defining Records

This section will provide definitions of a "record" as considered for this paper within the context of higher education and the University of Pittsburgh.

ARMA International defines a record as a "fixed piece of information generated in analog or electronic formats that document an event or transaction".[3] The Society of American Archivists defines a record as "a written or printed work of a legal or official nature that may be used as evidence or proof; a document" or "data or information that has been fixed on some medium; that has content, context, and structure; and that is used as an extension of human memory or to demonstrate accountability".[4]

The Commonwealth of Pennsylvania's Right to Know Law defines a record as "information, regardless of physical form or characteristics, that documents a transaction or activity of an agency and that is created, received, or retained pursuant to law or in connection with a transaction, business or activity of the agency".[5]

Records are created, used, managed, and retained throughout the University every day. Whether they are official correspondence, enrollment applications, research data, grade change requests, contract agreements or purchase orders, University operations run on records. Records remain active as long as they are necessary to conduct daily business. Inactive records, no longer necessary for normal business transactions, are retained for a prescribed length of time or destroyed based on applicable regulations.

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[3] Association of Records Managers and Administrators, 2016.

[4] Pearce-Moses, Richard. *A Glossary of Archival and Records Terminology*. Chicago Illinois: Society of American Archivists, 2005.

[5] Pennsylvania Freedom of Information Coalition, 2016; http://pafoic.org/what-is-a-public-record-under-the-right-to-know-law/

Records are "scheduled" for retention and destruction based on governing guidelines for a particular record type. Legal requirements at the federal and state level stipulate how records are created and who can access them, or how long they need to be retained. Legislation like FERPA, HIPPA[6], and the Employee Records Act require secure, responsible, and focused records management practices. Open records laws like the Freedom of Information Act and Pennsylvania's Right to Know Law mandate reasonable access to public records. Inconsistent recordkeeping practices, outdated policies, or direct negligence increases the liability of institutions under the purview of such legislation.

Records chronicling the history of the University, tenures of Chancellor administrations, Board of Trustees minutes, department growth, faculty achievements, and student life are all components of the University Archives used by Pitt researchers, as well as national and international researchers, to produce scholarly research. The University Records Management program helps to identify records of historical significance that document the University's historical narrative for potential inclusion in the University Archives.

Perhaps the greatest challenge in today's records management environment are electronic records. "The greatest challenge for today's records managers is electronic records, including those born digitally and those reformatted into electronic files."[7] The University Records Management Program identifies and schedules not only hardcopy and paper records, but also records that have been digitized as well as those "born-digital," or created in a digital environment. Electronic records are generated in a variety of formats, retain a variety of metadata, and are stored in a variety of ways across campus. Email, database tables, and electronic research data are also forms of electronic records that proliferate during the University's normal course of business.

When considering the definition of records, how they are used and created, the varied forms they take, and the factors regulating their use and retention, the need for a pro-active and robust enterprise-wide records management program emerges as vital to the University to reduce legal liabilities, secure sensitive information, encourage operational efficiency, and preserve the University of Pittsburgh's historical identity and memory.

Records Management at the University of Pittsburgh

History of Records Management at Pitt
The University Records Management Program (URM) originated in the Business Services Office in 1977. In 1999, the University assigned the URM to the Archives Service Center and entered into a contract with Business Records Management, Inc. (BRM), a regional records management company, to store inactive records at several remote facilities around the Pittsburgh metropolitan area. Recall Holdings Ltd. acquired Business Records Management, Inc. in

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[6] Family Educational Rights and Privacy Act; Health Insurance Portability Protection Act.
[7] Purcell, Pg. 119.

December 2014. At that time, service to University of Pittsburgh accounts was not altered in any significant fashion.

Following a year-long international acquisition process which began in the summer of 2015, Recall Ltd. was purchased by Iron Mountain, Inc. However, a ruling by the U.S. Department of Justice restricted Iron Mountain's acquisition of Recall operations in 13 U.S. cities, including Pittsburgh, where such an acquisition would create a monopoly over records storage service. As a result, a privately-held third-party records and information management service company named Access acquired Recall's Pittsburgh-based storage operation.

While Iron Mountain's acquisition of Recall legally could not include Pittsburgh storage operations, it was not prohibited from including Recall's Pittsburgh-based destruction services in the purchase. Between May and July 2016, University of Pittsburgh contracted destruction services were owned by Iron Mountain. The University records manager, together with ULS administration and University Purchasing, succeeded in July 2016 in terminating Iron Mountain's control of the University's destruction services and consolidating all records management services with Access.

Access assumed control of all BRM facilities, services, and offices in Pittsburgh, thus the transition to Access did not affect University records in so much that certified storage security, physical and inventory control, and NAID-certified destruction commitments are concerned.

The University of Pittsburgh employs a distributed model of records management that is centrally lead through the URM program, directed by the University Records Manager. Under the University's contract with Access, records management services (excluding supply purchases) are provided at no cost to the department. Such favorable terms have led to the establishment of over 400 departmental Access accounts. The University's agreement with Access does not include University of Pittsburgh regional campuses, University of Pittsburgh Medical Center or University of Pittsburgh Physicians' offices.

The mission of the program is "to provide for the efficient and systematic control of the creation, receipt, maintenance, use and disposition of records. Records administration covers the management of records, regardless of age, to meet the administrative, financial, legal and historical needs within the University of Pittsburgh's offices and departments."

In partnership with Access, the URM facilitates inactive records storage and secure records destruction. The URM provides guidance on development of retention schedules, consultation on vital records identification and protection, guidelines on procedures to comply with internal and external policies and regulations, training on the classification and inventorying of records, and facilitates the transfer of inactive records to Access and historical records to the University Archives.

Decentralized Authority

The University records manager serves as the authorized liaison between University departments and Access. The records manager's job description states that the "records manager will serve as Archives liaison with our campus departments." This enables a distributed approach in which departments and units are responsible for daily management of their records, adherence to retention schedules, and proper identification of records that can be destroyed. Department's provide authorization for records destruction, extensions of destruction dates, or request records transfers to the University archives. Due to the nature of a large institution like Pitt, a single records manager cannot maintain central authority over every business unit within the University. However, policies and mandates are in place to guide and direct University units as necessary.

Retention Schedules

A records retention schedule provides specific guidance for the management of records types and record groups, in consideration of record function and specific office based on legal, financial, and historical precedent.

The University of Pittsburgh maintains two primary record retention schedules: the General Retention Schedule and the Financial Records Retention Schedule.[8] During the summer of 2000, staff completed record retention and disposal schedules for the Office of the Provost and a General Schedule for the offices, departments, and units reporting to the Provost. The general schedule provides guidance for the management of certain groups and types of records that are common to most offices at the University of Pittsburgh and conforms to established legal requirements.

The Financial Record Retention Schedule, managed by the Office of the Chief Financial Officer, provides specific retention requirements for the central retention of financial records and the departmental retention of "convenience copies." The CFO's office revised this schedule in May 2015.

Departments and business units across campus may maintain and adhere to their own specific retention schedules. For example, the Office of the University Registrar's retention schedule is based on accredited industry guidance and pertains to student academic records.

In addition to internal policies, University records management is largely guided by legal regulations at the local, state, federal, or international level. Appendix one of this document lists a number of regulations that shape University of Pittsburgh records management policy including the aforementioned FERPA, HIPPA, FOIA, and Pennsylvania's Right to Know Law.[9]

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[8] Both General Retention Schedule and the Financial Records Retention Schedule can be found on the University's records management website; http://library.pitt.edu/asc-university-records-management.
[9] See Appendix 1, Applicable Records Management Regulations.

<u>University Records Management and the University Archives</u>
A university will benefit from a robust records management program in that it aids in the work of the University Archives. "A solid campus records management program is one indication of a successful academic archives program".[10]

The Archives Service Center blends two of its mission objectives together in utilizing records management to proactively advise departments and administrators on record keeping best practices during their records' active management and use. When the time comes for archival accession, the records are intellectually arranged in a manner that enhances the archives ability to process the collection and make it available for public research when applicable.

For instance, Archives Service Center staff has begun a dialogue with the Office of Chancellor Patrick Gallagher to advise his office on records keeping practices that will facilitate appropriate transition of hardcopy and electronic records following his tenure as Chancellor. Collaboration and consultation also positions the University Library System and Archives Service Center as campus leaders of records and information management.

Records Management at other Universities

The University of Pittsburgh's University Records Management Program (URM) can be considered an established program, having been created in 1977. This section is intended to provide a surface-level look of records management programs at four selected universities that fall into the following categories: large public university with an established RM program; large public university currently establishing a RM program; large state-related PA University with established RM program; and a medium state-related university with no centralized records management program. This section will provide a scope through which to view Pitt's current URM resources and initiatives, as well as a survey of common RM objectives that Pitt can potentially employ.

<u>University of Virginia</u>
The University of Virginia (UVA) is a public university and considered a state agency with an established records management program (est. 1996) that adheres directly to the Virginia Publics Records Act for retention directions. Currently, the University employs three devoted records management staff: the University records officer and two records management analysts.

In 2008, a records management team comprised of 12 stakeholders from around the University submitted a report[11] containing an in-depth analysis of records management practices at UVA,

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[10] Purcell, Pg. 113
[11] *Executive Summary for Process Simplification Steering Committee Records Management Project.* University of Virginia, *2008.*

which led to an overhaul of the program and adoption of policies steering the institution to the its current position in 2016.

A full-time records officer was hired in 2008 who reports to the chief information officer within the Information, Security, Policy and Records Office (ISPRO). The UVA records program requires faculty and staff to comply with University Policy and state law and "cooperate with the University Records Officer."

The UVA university records management office (URMO) provides consultations, development of policies, and training sessions. Records management at the UVA provides guidance on email management, electronic records management, scanning and reformatting, transferring records to special collections, and records storage.

The URMO offers 12 in-depth training classes for a variety of stakeholders across campus. It also offers seven task-specific classes on topics such as "email management, electronic records management, going paperless, and organizing your records." The program encourages departments to establish clear designation of records administrators and records coordinators, with details on responsibilities and competencies.[12]

Because the URMO manages all University records storage, the office maintains a web-based application that assists units in managing their physical records. The tool also allows UVA units to manage inventories of electronic records that have been submitted for digital storage.

Kansas State University

Similar to the University of Virginia, Kansas State University (KSU) is a large, public University. Prior to 2015, KSU had limited records and information management infrastructure across it campuses primarily managed through the University Library and Archives Program. In 2014, the University convened a university records task force to study and guide the creation of a records management program.

In May 2015 the task force delivered their final recommendations, which included establishing a standing university records committee, hiring a records manager, assigning an office of records, improving electronic recordkeeping systems, updating KSU policies and procedures manual, creating records and information management training, and evaluating mission critical records.[13]

Penn State University

Penn State University is one of four state-related universities, including the University of Pittsburgh, within the state of Pennsylvania. Records management is located under the University Library within the Eberly Family Special Collections Library. The department

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[12] UVA Records Management Website, 2016; http://www.virginia.edu/recordsmanagement/.

[13] *Final Report of University Records Task Force*. Kansas State University, 05/18/2015.

maintains two staff members – a records manager for archival and permanent records and a records management officer.

Penn State record management services is a codified service by University Policy.[14] Service objectives include records management training and information dissemination, records surveys and consultation, managing the University-controlled inactive records center, overseeing records management liaisons, and hosting an annual on-campus records management summit.[15]

Additionally, records management services are guided by the input and recommendations of the records management advisory committee (RMAC), consisting of nearly 30 Penn State University stakeholders convening since the 1980s.

In July of 2015, Penn State University began requiring "proof of records retention compliance,"[16] requiring all University business units to annually review their records and document their retention, disposition, and/or destruction. The review is submitted to the records management program via the unit's records liaison as mandated under the codified records management policy.

Temple University
Similar to Penn State and Pitt, Temple University is state-related university. The University Archives falls under the Special Collections Research Center and Conwellana-Templana Collection. According to the Director of the Special Collections Research Center, requests from the Libraries to establish a records management program have not been approved. Oversight is decentralized, with departments wholly responsible for records management compliance. Temple University Libraries work informally with offices to move records with long-term value to the archives to the best of their ability, and retain no control or authority over management of active University records.

Conclusion
Most Universities are recognizing the need to establish records management programs or update existing programs to meet the challenges of 21st century recordkeeping. Common themes from each of the four examples include training initiatives, record advisory committees, and documenting destruction of records to management liability.

Recordkeeping in the News

Records and information are often at the center of events, whether positively or negatively. Negative attention usually results from litigation or scandal, bringing to light inadequate

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[14] Penn State Policy AD35 University Archives and Records Management; http://guru.psu.edu/policies/AD35.html.

[15] Eberly Special Collection Website, 2016; https://www.libraries.psu.edu/psul/speccolls/psua/records.html

[16] "New rules govern retention of records," 07/6/2015; http://news.psu.edu/story/362392/2015/07/06/new-rules-govern-retention-records.

policies or procedures, or in extreme cases, willful negligence. Examining several recent cases will provide perspective on the importance of enterprise-wide records management endeavors which illustrate the manner in which records, and their management and dissemination, can impact a University. The need to maintain a pro-active approach involving preparedness, visibility, and trustworthiness which strengthens the institutional foundation of the University to weather such storms becomes apparent.

Freeh Report

In the wake of the child abuse scandal (2011) at Penn State University, a Special Investigative Counsel was convened to dissect the voluminous amount of records and data associated with the scandal in order that a true and accurate timeline and account of events be determined.

The *Report of the Special Investigative Counsel Regarding the Actions of the Pennsylvania State University Related to the Child Sexual Abuse Committed by Gerald A. Sandusky* (Freeh Sporkin & Sullivan, LLP)[17] was made public in July 2012 following the criminal trial of Jerry Sandusky. The report's scope note indicates the "…Special Investigative Counsel implemented the investigative plan by: Analyzing over 3.5 million pieces of pertinent electronic data and documents."[18]

During the course of its investigation the Special Investigative Counsel highlighted documents, notably emails between senior administrators, as being important to the investigation. "The Special Investigative Counsel had unfettered access to University staff, as well as to data and documents maintained throughout the University. The University staff provided a large volume of raw data from computer systems, individual computers, and communication devices."[19]

Building on the detailed accounts of methodology, procedures, and findings, the Freeh Report offers several recommendations concerning records management, information management, and electronic records from Chapter 10, Section 2.0 of the report:

> *2.2.14 Update computer use policies and regularly inform employees of the University's expectations and employee responsibilities with regard to electronic data and materials.*

> *2.5 Integrate faculty and staff from different disciplines and areas in University-wide professional development/leadership training to increase their exposure to other University personnel, programs, challenges, and solutions.*

> *2.6 Implement consistent, state-of-the art records management and retention procedures*

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[17] "Report of the Special Investigative Counsel Regarding the Actions of the Pennsylvania State University Related to the Child Sexual Abuse Committed by Gerald A. Sandusky." Freeh Sporkin & Sullivan, LLP, July 12, 2012. Contributed to DocumentCloud by Xarissa Holdaway, *Chronicle of Higher Education*. https://www.documentcloud.org/documents/396512-report-final-071212.html

[18] Freeh Report, Pg. 10.

[19] Freeh Report, Pg. 11.

In Section 3.0 the report recommends that a committee on risk, compliance, legal and audit regularly makes reports to the Board of Trustees on "significant issues facing the University" to "mitigate those risks." The Counsel recommends the University "coordinate a compliance council" of necessary stakeholders (Sec 4.0) and calls for "increased" and "improved" channels of communication (Sec. 3.5).

Due to the importance of police reporting to the investigation, the Counsel outlines clear recommendations concerning police records in Section 6.4, recommending that Penn State "review records management procedures and controls and revise where needed."

The importance of an updated, transparent, and inclusive records management program is clear when evaluating the Freeh Report. Records, specifically emails, continue to play a major role in the public understanding of the scandal and how the Board of Trustees handled certain decisions following the incident, as the Pittsburgh Post-Gazette reported as recently as March 9, 2016.[20]

Oregon Email and Record Release

In December 2014, the University archives at the University of Oregon released a zip drive containing nearly 30,000 documents from four presidential administrations to a University of Oregon professor in response to an open records request.[21] While the release was made according to the established archival protocols, some records, including presidential correspondence, pertained to exchanges with University faculty, students, and staff.

Believed to contain sensitive information, particularly concerning students, the records were returned after a contentious three-week period. The president's office raised concerns over potential FERPA violations resulting from the disclosure of presidential correspondence with parents. Two archivists were placed on paid leave, eventually leading to one employee's termination and the resignation of the second.[22]

Former University Archivist James Fox spoke to the need of communication and proper staffing between campus records management, archives, and data management and curation in an *Oregonian* article in April 2015 to better preempt such situations.

Issues of accessibility, restrictions, and embargo notwithstanding, the records management component of the event displays how transparency and integrity are an important characteristic of a records management program. This is especially true at Pitt, which unlike the University of Oregon, is not subject to the full breadth of public records laws. Consistent

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[20] "Penn State emails give insight on key Sandusky decisions." Pittsburgh Post-Gazette, March 9th 2016. http://www.post-gazette.com/news/state/2016/03/09/Penn-State-emails-give-insight-on-key-Sandusky-decisions/stories/201603090081.

[21] "U. of Oregon Scrambles to Retrieve 22,000 Records Released to Professor." *Chronicle of Higher Education*, January 21, 2015.

[22] "Cache of Records Released by U. of Oregon Is Returned." *Chronicle of Higher Education*. January 28, 2015.

dialogue, codified policies, and visibility of best practices and resources will stimulate an environment of openness, accountability, and transparency.

University of Illinois President email scandal

In 2014, the University of Illinois Urbana Champaign rescinded its hiring of professor Steven G. Salaita following the public disclosure of anti-Israel tweets authored by Salaita on a personal Twitter account. Salaita subsequently sued the University on grounds that the decision was a violation of academic freedom.[23]

An Illinois state judge in June 2015 ordered the University to release over 1,000 documents regarding the decision. The record release led to the resignation of Chancellor Phyllis Wise on August 6th, 2015. On August 7th, the Chicago Tribune reported that senior University officials used personal email accounts to discuss campus controversies in order to avoid Illinois open records laws.[24]

Conclusion

In terms of preparedness, visibility, and trustworthiness, these examples illustrate several records management themes that academic institution must consider: clear and consistent dialogue, clearly defined policies and procedures, transparency, and management of platforms. Moreover, several cogent themes can be drawn solely from the Freeh Report itself: the need for clear and consistent records management and retention guidelines, university-wide dialogue and meetings of stakeholders, and definition of employee responsibilities with regard to electronic data and materials.

In 2012 then University of Pittsburgh Records Manager Zach Brodt (now University Archivist) completed an assessment of the Freeh Report's findings and offered corresponding recommendations for URM at Pitt. The recommendations included the formation of a records management advisory committee, evaluation and subsequent updating of the University's General Retention Schedules, conducting a University records survey, and acknowledgment of necessary preservation of electronic records.[25]

Penn State formed its records management advisory committee in 1989 and began addressing electronic records in 2005. The University records manager report highlights the omission of Pitt police records and UPMC medical records – considered University records – within the General Retention Schedules as specific examples of the need for a comprehensive review of the University's general retention schedule. A records survey will not only allow the URM and

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[23] "U. of Illinois Must Release Thousand s of Documents to Salaita, Judge Rules." *Chronicle of Higher Education*. June 12, 2015.

[24] "U. of I. officials used personal email to hide discussions." *The Chicago Tribune.* August 7, 2015. http://www.chicagotribune.com/news/ct-university-of-illinois-private-emails-20150807-story.html

[25] "Records and Records Management in the Freeh Report*."* Zachary Brodt, University Records Manager. University of Pittsburgh. Unpublished, August 2012.

UA to better evaluate records management needs, it will allow for the necessary inclusion of electronic records into the dialogue.

Ultimately, the 2012 report cited the need of the "University Records Management program to plan ahead and be involved in policy development rather than serving a reactionary function in trying to document and retain information in an ever-changing University records environment."[26] The recommendations promotes a pro-active approach towards aligning stakeholders with records and information management concerns to form a relevant taskforce to report to senior administration in order to promulgate a robust and defensible records management policies at the University of Pittsburgh.

Defensibility at Pitt

The following section will describe how the University Records Management Program at the University of Pittsburgh applies its policies and the defensibility of the URM as a whole by describing record types, retention guidelines, awareness, liability, and adherence to federal and state law.

The University of Pittsburgh creates a multitude of record types under a number of different classifications. The University can be said to create administrative, operational, academic, student, health, athletic, and research records. Under the distributed framework of the URM program, business units and academic departments across campus are responsible for the management of their own records.

The University's General Record Retention Schedule serves as the primary guide for departments on the management of these record types. The schedule lists types of records under the following categories: correspondence, curriculum records, development/fund-raising records, financial records, general administrative records, grants and contracts records, groups and organizations, human resources, office/workstation computers, publications, special programs and events, and student records. The general retention schedule was last updated in August 2008, leaving University users and departments with an eight year old document which to reference. The existing document offers a broad approach to record types the often does not meet the needs of University administrators attempting to apply it to their departments.

In addition to the General Retention Schedule, the Chief Financial Officers' office maintains guidelines for the budget and controller departments, as well as other University departments concerning copies of official records sent to the office of record for processing and retention. The guide is broken into five columns: document type, department retention (copies), central storage department, central retention (originals), and information. Document types are organized by office of record, such as: asset management, financial records services, general

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[26] Ibid.

accounting, internal audit, office of finance, payment processing, purchasing, research accounting, tax department, and tuition reporting department.

Supplementing these University-wide retention guidelines are those that business units and departments may maintain to comply with retention guidelines specific to the nature of their records. The Pitt Police are one example, as well as the Office of the University Registrar, which follows guidelines distributed by the American Association of Collegiate Registrars and Admission Officers.

In addition to the above retention guidelines, in 2009 then Chancellor Mark Nordenberg issued University guidelines on research data management stipulating retention requirements for research data and records.[27] As of 2016 this policy was being reviewed within the scope of the University Senate committee charged with reviewing University policies on patent, copyright, and conflict of interest.

Hardcopy records not retained on-site are stored in off-site storage at Access. A number of checks and balances exist for audit and review purposes. To ensure secure custody of University records all record cartons submitted to Access are barcoded for tracking purposes which subsequently generates an audit trail. Record cartons are scanned into Access's system when picked up by an Access driver, while in transit, upon arrival at the storage facility, and finally scanned when in the final storage location. The same process is repeated when records leave the Access facility. Additionally, inventory reports, copies of work orders and supply requests, and direct on-site access to all records are available upon request.

Each month the University records manager receives a report from Access detailing each department that has record cartons in storage that are due for destruction that month. Upon notification from the records manager, departments have the option to authorize destruction, extend destruction dates, submit to the University Archives, or hold for review. When destruction is selected, both the University records manager and the University Archivist review the department's request. A list of boxes to be destroyed is sent to Access, who then generate a list of the appropriate pre-destruction work orders. The University records manager reviews the pre-destruction work orders and authorizes final destruction. Access provides NAID-compliant certificates of destruction for every box destroyed.[28]

Unbarcoded boxes submitted for destruction, as well as secure destruction bins and consoles placed in units and departments across campus, are not monitored directly by the University records manger. Units and departments are left to their own discretion. Large orders being sent to Access for destruction are asked to be reviewed by the University records manager prior to transfer to Access destruction facilities.

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[27] Guidelines on the Research Data Management at the University of Pittsburgh, 2009.
[28] National Association for Information Destruction, http://www.naidonline.org/nitl/en/

While destruction of records that are held in off-site storage is documented via communication between Access, the University records manager, and departments, no consistent documentation of records destroyed within business units is maintained, which creates certain exposure to legal liabilities. Additionally, one negative aspect of off-site storage is that departments can apply their own destruction dates and ask for permanent retention, manifesting a culture of "keep everything forever." Thus, clear visibility of the URM program is an important factor in disseminating resources, educating staff, and reducing University liabilities.

The University records manager does provide educational support and outreach, albeit limited due to time and resources. All new Access accounts or users participate in a tutorial conducted by the records manager outlining Access procedures, retention and disposition of records, and best practices. The URM program offers training session as part of the University's annual Faculty and Staff Development Program series. A University records management newsletter is distributed quarterly to all Access contacts communicating news and updates.

With over 400 departmental Access accounts spread across the University, records management visibility is driven by engagement via Access channels. However, units and departments still convey the fact that they didn't know the University offered such service until only recently. A majority of business units and departments recognize the need for records retention policies and guidelines as they relate to their own records. A lack of visibility concerning records policies across campus, or in attempting to navigate the existing General Retention Schedule, does not stimulate a positive image of records management services. A rethought approach to advocacy and outreach, as well as clear delineations of University-wide policies and retention schedules will foster a cultural shift that may pave the way for acceptance of future policies that will affect retention of electronic records and email.

A number of federal and state laws affect records management at the University of Pittsburgh. The Freedom of Information Act, signed into law under President Lyndon Johnson, provides mechanism for the general public to request public records of government agencies and departments. The University of Pittsburgh may be subject to FOIA requests in regards to federal grant applications and subsequent studies, or research content publically cited by a federal agencies.[29]

The State of Pennsylvania's open records law is known as the Right to Know Law (RTKL) and provides guidelines for public request of governmental records. Under the state's RTKL, Pennsylvania's four state-related institutions are largely exempt from the requirements of RTKL as they are not considered "Commonwealth agencies". However, the University of Pittsburgh is required to issue annual public reports including certain tax information as well as the salaries of all directors and officers of the University along with the 25 highest salaried employees.

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[29] See Appendix 1.

These reports are required to be made public for seven years on both the University's website and through the University Library System.[30]

Other state legislation, such as Pennsylvania's Sunshine Act, "requires agencies to deliberate and take official action on agency business in an open and public meeting. It requires that meetings have prior notice, and that the public can attend, participate, and comment before an agency takes that official action." The University of Pittsburgh's board of trustees is considered an "agency" and, as such, its meetings and meeting minutes are subject to the PA Sunshine Act. The agency can hold exceptions to open meetings, considered executive sessions, based on reasons outlined in the law.[31]

While currently distributed between the ULS, HSLS, RCR, Office of Research and HRPO,[32] sustained focus on research data management continues to foster an environment for open and accessible data retention methods, sharing, and preservation. In 2015 the University Library System formed a research data management track comprised of ULS staff and faculty members. The RDM track is charged with creating research data management resources and instruction-based consultations to Pitt's research community in developing research data management plans and assuaging the challenges of data management. The University records manager is a member of this team.

The University research community is comprised of faculty, post docs, graduate students, undergraduate students and staff spread across a variety of disciplines. University research generates an enormous amount of research data maintained on various media, from jump drives, laptops, and external hard drives, to departmental servers and proprietary software. In addition, hardcopy records including lab notebooks, correspondence, grant application materials, and research generated paper exists.

As of March 2016, the University Senate Committee charged with reviewing patent, copyright, and conflict of interest policies was in the process of reviewing and potentially revising Pitt's existing Guidelines on Research Data Management. As funder requirements and technology continue to widen the scope of potential research and data collection, it is imperative that units like the ULS continue to highlight and provide practical examples of the importance of research records and data management.

Conclusion

The primary weakness in the defensibility of the University Records Management Program at the University of Pittsburgh is the University's outdated and difficult to interpret General Retention Schedule. In order to meet the legal, financial, historical, and administrative

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[30] PA Open Records Website, 2016; http://www.openrecords.pa.gov/Pages/default.aspx.

[31] Pennsylvania Freedom of Information Coalition, 2016; http://pafoic.org/what-is-a-public-record-under-the-right-to-know-law/

[32] University Library System; Health Services Library System; Responsible Conduct of Research; Human Research Protection Office.

requirements of the University it is critical that an updated and comprehensive replacement be developed to guide and empower University departments and units. The ULS cannot implement unilateral changes, thus any such efforts must be precipitated by cooperation from senior University offices like the Office of the Provost.

The decentralized structure of the University Records Management Program, wherein a single person facilitates and manages the program across the entire institution, places the responsibility for documented and transparent records creation, organization, retention, and destruction practices within the departments and business units themselves. While records that are housed in Access off-site storage are reviewed prior to destruction, all other destruction practices are handled internally by departments with potentially little documentation.

Finally, the University of Pittsburgh lacks a comprehensive solution for managing and retaining "born-digital" records, email, legacy data, and other digital content. Solutions to all of these challenges will require cooperation and collaboration between stakeholders across campus.

Strategic Actions and Recommendations

The preceding sections of this report provide context to the University Records Management program at the University of Pittsburgh. The following strategic actions and recommendations are both short term solutions and long term objectives that can and should be pursued.

Strategic actions
The brief examination of University records management programs conducted above reveal several common actions that can be applied to the University of Pittsburgh's Records Management Program to increase its effectiveness, including establishing a records management advisory committee, updating and renewing retention guidance, and outlining a clear and visible records management mandate at Pitt. The thematic nature of these actions is likely to have a cascading effect on the University records management environment.

Records Management Advisory Committee
The University of Pittsburgh should identify and convene a committee of stakeholders – records management advisory committee - from across all five of its campuses to serve in an advisory capacity on records and information management initiatives, policies, projects, and steerage for the University. Such a committee would meet quarterly to evaluate records management defensibility at Pitt, compliance and risk assessments, identify priorities, address policy issues, and develop solutions.

A diverse group of participants is necessary to reflect the wide range of perspectives, interests, and expertise of stakeholders across campus, including but not limited to: The University Library System, Health Services Library Systems, Office of the Provost, Office of the University Registrar, Office of the Chief Information Officer (CSSD), Office of Research, Internal Audit,

Office of General Counsel, University Faculty Senate, Risk Management, Chief Financial Officer, Chancellor's Office, Office of Human Resources, Title IX office, Alumni Relations, and the Office of Faculty Records. Communication and cooperation between stakeholders is vital to the success of a 21st century records management program at such a diverse institution.

Review and Revise University Retention Schedules

The first charge of the records management advisory committee will be to review, research, update and revise the University's General Retention Schedule, last updated in 2008. The advisory committee should diligently review current internal policies, survey records creators and responsibilities by department, evaluate similar institution's schedules, and adhere to current federal and state regulations. Each stakeholder representative on the records management advisory committee would be responsible for developing their business unit's updates.

Information management in 2016 is conducted on a much larger scale than in 2009, often in enterprise-wide systems storing a tremendous amount of University records. An updated iteration of the University's retention and disposition guidelines should address all University generated record types, legacy electronic data, and records being created on stored on proprietary cloud sites like LabArchives and Box.

Acknowledgment of departmental records retention schedules, such as Pitt Police Records, dual UPMC/Pitt medical records, and the Office of the University Registrar should be identified on the main schedule. Departments should then be required to deposit a copy of any such departmental retention or disposition schedule with the University Records Management program.

Clear Mandates, Policies and Procedures

In order to best serve the University community, the University Records Management Program as well as the records management advisory committee will need a clear mandate to facilitate policies and procedures. While University Records Management is addressed in a 1977 University archives policy, the policy is outdated and fails to address the responsibility and challenges that a higher education records management program face in 2016.[33] The Codification of University Records Management, similar to Penn State's comprehensive Policy AD35,[34] would provide such a mandate.

Recognition of the advisory committee and promotion and visibility of the updated retention schedule will provide an opportunity for other policies and procedures to be addressed. For instance, initiating a University policy requiring departments to document boxes or materials they send for destruction at Access totaling more than 5 boxes will provide accountability and diligent documentation of records destruction. While new oversight was instituted at Penn

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[33] See Appendix 2, University of Pittsburgh Archives, 1977.
[34] Policy AD35 University Archives and Records Management, Penn State University; http://guru.psu.edu/policies/AD35.html.

State in 2015,[35] no such oversight exists at Pitt. A clear mandate will allow the University Records Management program to carry out policies and procedures beneficial to the defensibility of University policies.

Education and Awareness

Provisions of a clear mandate, a standing advisory committee, and revisions of the general retention schedule will provide the University records management program with focused momentum to promote records management education and awareness through direct engagement of the University community. This should involve the following: expansion of FSDP workshop and development series; read green about records management and Access; clear definitions and visibility of retention requirements; cultivation of existing Access community of 400 records administrators and managers; continuation of University records management newsletter; and potentially hiring a graduate student intern to develop training and resources. Other forms of educational outreach and awareness should be adopted as applicable.

Recommendations

In order to best prepare for future recordkeeping concerns and needs, visibility and awareness of areas where improvement is viable must be established. The following are recommendations based on evaluations of professional standards, other university programs, and the author's interactions with colleagues and peers.

Scanning

Throughout meetings with University administrators concerning records management or Access services, one particular area of interest is the University's and/or Access's digitization services, indicting a growing desire among departments for streamlined University services and guidance on digitization. More and more departments are scanning records and destroying the hardcopy, rendering the University's information assets more vital – and more vulnerable. The current piecemeal approach by University departments lends itself to inconsistency in all stages of the digitization process including capture, metadata input, formatting, deposit locations, migration awareness, and preservation.

New guidelines, policies, and resource should be provided to promote consistency. Such guidance would include identification of services available, best practices for conducting a digitization project, and access and preservation of electronic records once they become the "certified copy". This initiative should not interfere with other work or take away resources already allocated towards other goals, but rather should work in a supplemental manner.

Electronic Records

The University utilizes a hybrid mix of hardcopy and electronic records to conduct its business. Electronic records may be scanned documents or "born-digital" documents. They can be outputs of common programs like Microsoft Word or Excel, exports from databases or other

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[35] "New Rules"; http://news.psu.edu/story/362392/2015/07/06/new-rules-govern-retention-records.

software, or renderings of information from a proprietary system. As records and platforms continue to expand the University should survey the ways electronic records are created throughout its units, how and where they are managed and retained, consider their function, and compile a list of its mission-critical electronic records platforms and content.[36]

Email

Email has become ubiquitous as a common and convenient method of communication. Emails can serve as evidence of transactions, communication, and intent. However, the volume of emails at an institution like the University of Pittsburgh creates massive challenges when considering how to properly manage and retain applicable email accounts.

For instance, when a mailbox becomes full, what do most users do? Delete a large volume of emails? "Archive them," whereby a certain date range of emails are saved as a file on a desktop or hard drive? Continue to expand the size of an inbox? This example presents a serious issue as emails have become important in audits, record requests and discovery.

Just as with common correspondence, data sharing and manuscript sharing between researchers may take place over email. Depending on the nature of the research content being shared such practices could constitute a liability for the University. In the same sense that it is against FERPA guidelines to transmit student information via email for the Office of the University Registrar, perhaps researchers should have more properly controlled conduits of transmitting research data other than email. This example highlights the importance of managing email attachments as a method of information exchange, not simply transactional correspondence.

The records management advisory committee should pursue a survey of email usage and statistics at the University of Pittsburgh and implement a triage-like approach to email management, wherein the email accounts of senior administration are addressed first.[37]

Legacy Data

In addition to electronic records created and used during daily business, the University maintains legacy data on a number of electronic document systems, proprietary platforms, and cloud-based servers. Systems such as ImageNow and PeopleSoft contain vital University records. Emerging cloud-based services, such as electronic lab notebooks offered through LabArchives, will contain critical research records and data of tremendous importance to the University research community. Software systems may become outdated or obsolete over time – read ISIS, the student information system preceding PeopleSoft – requiring detailed plans of

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[36] "Successful academic records programs have clear electronic records policies" (Purcell Pg. 124). He goes on to list components of such a policy: how to schedule an email; capture and preserve digital images; electronic retention (legal and operational); metadata creation; length of retention; transfer and preservation.
[37] See the National Archives and Records Administration Capstone approach.

action for migrating and preserving these vital records.[38] The University should conduct regular evaluations of all the software platforms containing critical University records, the specific records and data housed in these systems, the continuing viability of such platforms, and the existence of migration and preservation plans for said data.

Conclusion

This paper has detailed how the University of Pittsburgh will benefit from a reexamination of its University Records Management services and activities by describing the history of records management at Pitt, surveying selected records management services at comparable universities, presenting examples of higher education recordkeeping in the news, addressing the defensibility of current records management procedures at Pitt, and presenting several strategic and aspirational recommendations the University should pursue.

University records management at Pitt should be pro-active and stimulate an environment of openness, accountability, and transparency in order to promote information management integrity. In order to do so, strategic actions such as stakeholder collaboration, revisions of retention schedules, and University mandates are necessary. More than simply knowing what to throw away and what to keep, University records management is defined by important legal, financial, operational, and historical factors.

A robust, modern, and pro-active University Records Management program will ensure a positive and trustworthy campus environment. Proper information exchanges and record keeping will only serve to embolden records facilitators across campus and strengthen the institutional foundation of the University. That foundation should be built on transparency, efficiency, and defensibility in order to best meet the challenges of 21st century records management the University of Pittsburgh.

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[38] Group Unveils a Model Policy for Handling Student Data, Chronical of Higher Education. http://www.chronicle.com/article/Group-Unveils-a-Model-Policy/237690

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Applicable Records Management Regulations

● Freedom of Information Act
While the Freedom of Information Act (FOIA) applies to federal agencies, University of Pittsburgh records pertaining to federal grant applications, and in limited circumstances, research content publicly cited by a federal agency, may be required to be produced in response to a FOIA request. Personally identifiable information, unpublished proprietary research data, and other sensitive content can be requested for deletion prior to submission.

University departments should immediately contact the Office of General Counsel in the event they receive a FOIA inquiry.

● Pennsylvania Right to Know Law
The University of Pittsburgh is one of four state-related institutions in the state of Pennsylvania. Under Chapter 15 of Pennsylvania's Right to Know Law, state-related institutions are required to file tax information and limited salary information with certain state offices on an annual basis.

The University's Chief Financial Officer maintains annual tax and financial disclosures in accordance with the RTKL which was enacted in 2007. University of Pittsburgh's financial disclosure reports are retained by the state and accessible through the commonwealth's enterprise portal. Additionally, the University Library System also maintains certain financial disclosure reports.

University departments should immediately contact the Office of General Counsel in the event they receive a Pennsylvania RTKL inquiry.

● HIPPA
The Health Insurance Portability and Accountability Act (HIPPA) promotes medical records security and confidentiality through federal protection of personally identifiable health information that is utilized and maintained by covered entities and associated business by ensuring patient rights and regulating health information disclosure.

The University of Pittsburgh maintains a HIPPA website that details privacy practices concerning health information uses and disclosures at the University of Pittsburgh.

● FERPA
The Family Educational Rights and Privacy Act (FERPA), federal legislation designed to protect the privacy and integrity of student educational records, applies to all higher education institutions receiving Department of Education funding. FERPA protects the rights of students by providing them access to their educational records, limiting disclosures of educational records, and allowing for students to review and seek corrections of their educational record.

Contact the Office of the University Registrar for details concerning your University of Pittsburgh educational records.

Visit the Department of Education's website to learn more about FERPA.

● Employee and Employer Records
Under the Pennsylvania Personnel File Act (Inspection of Employment Records Law), an employee can request to inspect his or her own personnel records. Please review the law to learn more.

University of Pittsburgh

A University has a responsibility for the preservation of records containing evidence and information with respect to its origins and development and the achievements of its officers, faculty and students.

Recognizing the importance and permanent value of many of the University's official files, records and documents, the University has established the University of Pittsburgh Archives to insure the preservation of these materials. Similar programs have been established and approved by the governing boards of other distinguished universities.

Programs of institutes or special events, copies of reports and speeches, clippings and other publicity material, records and publications of student organizations, and faculty personal papers, photographs, scrapbooks, curriculum materials, etc. are also preserved in the Archives and provide a valuable resource for historians.

Recognizing that some inactive records need not be retained permanently but must by law be retained for a specified period, the University has established a Records Retention Center to store this type of record. The Records Retention Center and the University Archives preserve records under controlled conditions.

All administrative officers of the University, including members of the faculty whose performance of administrative duties puts them in possession of files, records, or documents pertaining to their official duties, are requested to observe the following regulations:

1. The records of the official activities of the University officers and offices are the property of the University of Pittsburgh.

2. The University Archivist and the Records Retention Coordinator will prepare a set of guidelines establishing standards for preservation of University records for both retention as required by law and for archival and historical purposes. These guidelines will identify the general type of records that should be retained as well as the specific kinds of records that are required by law to be preserved.

3. The officer in charge of each administrative office or academic department will screen on an annual basis all records that are inactive. In accordance with the guidelines, that officer shall either destroy those records or transfer them to the University Archivist or the Records Retention Coordinator for further screening and preservation if necessary.

4. The University Archivist and Records Retention Coordinator shall consult with administrative officers to determine the type of restrictions to be placed upon the use of confidential records.

5. The Chancellor or the Secretary of the University may add such further regulations and directives as may be necessary or appropriate.

Senior Administrative Staff
Approved Document 10/19/77

PITTSBURGH, PA. 15260