Records Retention Schedules
Their purpose, creation, and application

Information Security Shredding Event a Huge Success

The University’s Records: Documenting a University
Records Retention Schedules
Their purpose, creation, and application

Records Retention Schedules are a guide to the records of an office for both department staff who work with the records daily and those outside of the office who have a legitimate need to understand what the office keeps, such as auditors and the public.

UC Records Management creates records retention schedules that comply with Board of Trustees directives and that are required by the Ohio Public Records Act as well as relevant federal statutes. Retention schedules keep us compliant with the law, assure that we have records as long as we need them, and promote efficiency through the proper disposition of unneeded records. The major purposes of a schedule are to:

- describe the records created or received by and maintained by an office;
- set minimum retention periods that records are to be kept; and
- establish final disposition of the records

The first step in creating a schedule is to find out what records an office holds by performing a records inventory. Using the inventory, records are categorized into series of like records with similar purposes, content, and retention guidelines.

The next step is to assign a retention period and disposition to each records series. Retention is driven by content (rather than media or format) and is based on the value of the records to the University. Records have legal, administrative, fiscal and historic value. Each aspect is considered to be of equal value and retention periods are assigned to protect all of them. Some records will have more than one type of value. The longest retention period that covers all values will be assigned.

Legal/Regulatory
Rules are established by federal, state, and local laws and regulatory bodies that require certain records to be created and/or maintained for a certain period of time. Records not only serve an office through their original purpose, but they also become evidence of compliance with legal and regulatory statues. The legal value of a record determines its absolute minimum retention, but not all records will have a legal value. UC uses the records retention matrix developed and maintained by the Inter-University Council of Ohio to determine minimum legal retention requirements. The matrix is based on state and federal laws, rules, and regulations.

Administrative/Fiscal
The administrative value is connected to the reason the record was created in the first place, or the value to the department in its operations. Continuing fiscal value is related to tax and audit requirements. If the record continues to serve its administrative or fiscal function longer than the legal minimum requirement the retention period can be bumped up.

Historic
Historic records of the University are considered permanent. The determination of a historic record is based on University Archives collection policies. The historic value will trump all others.

Applying record values to retention
Some existing retention schedules at UC may be on older state forms or other formats. It’s important to understand that if the schedule has been properly approved, it is still valid, no matter what form it is in. As schedules are reviewed they will be transferred to the current columnar format.

Current UC schedules contain the following information:

- Schedule number – unique number identifying the record series assigned to an office. The schedule number is made up of three parts, the year of creation, the class number and the number of the schedule.
- Records Series – a title assigned to the records series;
- Series Description – a short description of the kinds of records found in the series;
- Authority/Explanations – the IUC Retention Group, other authority or explanation as to why the retention was assigned;
- Retention – the minimum amount of time that records in the series must be retained;
- Disposition – what has to happen to the records after the minimum retention period has expired.

After the schedule is written, a draft is sent to the department for review. After any desired revisions, approvals are signed by the department records officer and the University Archivist. Once the schedule is approved you may use it to manage your records. Reviews of the schedule can be done at any time and new records series added.

It is important to understand that you can only dispose of university records according to a records retention schedule written and approved by the Records Management Program administered by the University Archives. (See UC Rule 10-43-10.) The only time that records cannot be disposed of according to an approved schedule is if there is knowledge of possible litigation or a legal hold on the records issued by General Counsel.

Does your department have an approved records retention schedule? Do you know where to find your department’s records retention schedule? Do you know how long you need to retain the records that you create and manage? Get assistance today by contacting UC Records Management.
Information Security Shredding Event a Huge Success

On October 22, 2009, the Office of Information Security (InfoSec) held a shredding event on the West Campus in cooperation with Shred-it, a national provider of document destruction services. All departments of the University were invited to bring records ready for disposition to be shredded free of charge. The event, coordinated by Information Security Officer Quinn Shamblin, was part of InfoSec’s Awareness Week observed October 19-23. The week was full of events such as demos on USB flash drive hacking, hard drive encryption, WiFi password cracking and Bluetooth headset eavesdropping, as well as a free pc security assessment and configuration.

The shredding event began at 11:00 and was scheduled to end at 2:00, but the service proved to be so popular that shredding was not complete until nearly 6:00. My colleagues and I took boxes of records to be destroyed right at 11:00 and there was already big pile of records waiting for destruction beginning to form. The piles quickly began to grow up and out with many staff members still flocking to the destruction site to add their records.

Awareness Week is just one tool in InfoSec’s impressive collection of services to keep the University of Cincinnati’s information secure and promote protection of privacy and data. According to their website:

It is the mission of the UC Information Security Department to safeguard the sensitive data of our students, faculty and staff. To protect the Confidentiality, Integrity, Availability and Privacy of the business critical and regulated data needed by the University of Cincinnati in order to fulfill its mission. To protect the reputation of the University by proactively identifying existing vulnerabilities, by ensuring the remediation of those vulnerabilities and by investigation of Information Security incidents.

They do this through the application of software and hardware, policy development, training, and awareness. Their website (http://www.uc.edu/infosec/) is full of great information that can help you understand both the risks we can face to our information and what we can do to minimize them. They also offer a regular Information Security Update to keep readers informed of the latest issues in information security.

To schedule shredding service through InfoSec or to find out when the next shredding event will be held, please contact them at 556-ISEC or infosec@uc.edu

Information Security has placed signs on campus dumpsters discouraging improper disposal of sensitive info.
Information Security Officer Quinn Shamblin prepares for a day of document destruction.

Shred-it brings their equipment on-site and shreds material using shredders built in to their trucks.

Just after 11:00 a.m., boxes of records to be shredded were already piling up.
The University’s Records:

Documenting a University

“I therefore give, devise and bequeath to THE CITY OF CINCINNATI, and to its successors, for the purpose of building, establishing and maintaining as soon as practicable, after my decease, two Colleges for the education of white Boys and Girls, all the following real and personal estate, IN TRUST FOREVER, to wit:”

So says the single record that started it all, the twenty-one page Will of Charles McMicken, signed by McMicken and his witnesses on September 22, 1855 and filed in the probate court at Philadelphia. After McMicken’s death on March 30, 1858, the will was presented on April 2 and probated on June 10 in the probate court of Cincinnati, Ohio.

The 1859 City ordinance that gave Cincinnati the entitlement to act on McMicken’s will and establish “The McMicken University of Cincinnati” outlined the first requirements for records creation and management for the University. It ordered that the board of directors of the University:

shall cause a full record of their acts and proceedings, and accounts of the property and funds of the estate, and of receipts, disbursements, use and management thereof; also, full and exact statements of the number of Professors and others employed, and pupils enrolled as attending in said University, to be carefully kept in proper books…

Those books are in the UC Archives & Rare Books Library today.

McMicken’s estate was in litigation for several years and was not settled until after the Civil War. The University of Cincinnati was established in 1870. The 1871 Bylaws of the Cincinnati University Board of Directors defined the office of Clerk and provided for the recording of important information, stating:

It shall be the duty of the Clerk to attend and keep an accurate and complete journal of the proceedings at every meeting of the Directors, with marginal notes, and an index of every matter transacted; to keep regular account books by double entry, in which all the funds, accounts, receipts, expenditures, and financial matters of the University shall be entered, and posted up in a proper and business-like manner… [and] …to file and preserve all bills, accounts, claims, reports and correspondence, or other papers of the Board…

T.B. Disney was the first Clerk of the Board of the University of Cincinnati to take on this responsibility.

As the neighborhood around the original McMicken property changed into a more industrial area, and as the University continued to grow, the administrators initiated plans to move the university to an environmentally-friendly area with room to expand. McMicken’s will again became a record of discussion—and dissension. As the will excerpt quoted above states, McMicken gave his real and personal estate to the city for the purpose of establishing a college and McMicken’s heirs took this very literally, claiming that an attempt by the University to physically move operations would result in forfeiture of the bequest. The Circuit Court of Hamilton County and the Supreme Court of Ohio both disagreed. In a series of cases that began in 1890 and finally concluded in 1893 with the final appeal, the courts concluded that the University had every right to build on a new property in
Burnet Woods. The full record of briefs and decisions in the cases is available in the University Archives. Plans went forth in 1894 with the issuance of “Instructions for Architects in Preparing Plans for the New University Buildings to be Erected in Burnet Woods Park in the City of Cincinnati.”

Student Academic Records and Registration

While the Board of Directors (as the Board of Trustees was known then) concerned themselves with organizational and financial records, the academic departments took responsibility for documenting student information. As consistent retention requirements were not applied to university records until the 1970s, fewer records of other types have survived, but student records (as well as board records) were considered permanent. A study of the development of records creation, filing systems and equipment in the academic areas gives us a good idea of how records management as a whole progressed across the university.

The 1893 Rules Adopted by the Faculty of the Academic Department direct several records creation and maintenance activities, specifying what data was to be collected and to whom it was to be disseminated. The Registrar was responsible for maintaining enrollment statistics, classifications of students, attendance, and student progress. The use of pre-printed forms, or “blanks” as they are termed in the Rules, demonstrates the desire to collect uniform data. Blanks were used for registration, entrance exams, matriculation, grade reporting, and student transcripts.

(Continued on page 12)
Program News

Schedule Development

New Schedules:
- Payroll
- Environmental Health

Updated Schedules:
- Sponsored Research Services

University Records Management is systematically working with each department in the University to inventory their records and to create records retention schedules outlining the length of time that records must be kept. If you do not have a current records retention schedule, you will be contacted in the near future to begin this process for your department, but you don’t have to wait until then to get a handle on your records. Contact Records Management to get started.

Records Transfers

The following University records have been transferred to the University Archives:

Faculty Senate
Accession No. UA-09-18, 5 boxes
Records, including meeting minutes and agendas, committee reports, manuals, rosters, bylaws, reports, history, and photographs, 1978-2005.

College of Design, Architecture, Art & Planning, Student Affairs
Accession No. UA-09-19, 3 boxes
Records of DAAP programs (Summer Enrichment, Freshman Experience, Orientation) and events (DAAPworks, Graduation) including reports, meeting minutes, planning documents, roster, correspondence, publications, evaluations, and statistics, 1970-2005.

Office of the Senior Vice President & Provost
Accession No. UA-09-20, 13 boxes
Provost’s subject files on individual colleges and programs, deans and vice provosts, accreditation, committees, 1982-2009.

Raymond Walters College, College Relations
Accession No. UA-09-21, 5 boxes
Publications, news clippings, awards, event recordings, advertising items, 1990-2009.

UC Graduate Council Minutes
Accession No. UA-09-22, 1 box
Minutes of the UC Graduate Council, indexed and arranged by year, 1939-1960.

UC Records Management Objectives

- To promote the administrative efficiency at the University by removing inactive or obsolete records from offices.
- To protect the University by ensuring compliance with all internal, state, and federal policies regarding the creation and disposition of University records.
- To ensure that all documents of administrative or historical value are rightfully preserved through transfer to the University Archives.

Promote, Protect, Preserve
Program News

**College of Business Administration**
Accession No. UA-09-23, 8 boxes  
Records of the College of Business Administration including development, publications, and awards, 1960-2007.

**Office of the President, Nancy Zimpher Calendars**
Accession No. UA-09-24, 1 box  

**Digital Projects**
Accession No. UA-09-25, 5 boxes  
Records from the UC Digital Projects department, including reports, subject files, project files, advertisements, and publications, 1995-2004.

**Internal Audit**
Accession No. UA-09-26, 2 boxes  

**Resident Education and Development**
Accession No. UA-09-28, 2 boxes  
Records, including meeting minutes, correspondence, weekly reports and manuals, 1999-2005.

**University Honors Program**
Accession No. UA-09-31, 4 boxes  
Records, including program and honors topics documentation, 1978-2008.

**Janice Schulz Becomes Certified Records Manager**
Janice Schulz, University Records Manager at the University of Cincinnati, has successfully completed the process of becoming a Certified Records Manager (CRM). The CRM is the officially recognized certification for records and information management professionals. Candidates for the CRM must first document required education and professional experience before being approved to sit for the six-part exam. The exam, administered by the Institute of Certified Records Managers, consists of five 100-question multiple choice sections covering various aspects of records and information management, as well as a final case study requiring two essay-style answers. Schulz is one of only twelve CRMs in the state of Ohio and only three in the Cincinnati area.

**April is Records and Information Management Month**
Each April ARMA International, the professional organization for records and information management, holds RIM Month. This year UC Records Management will be offering an expanded set of workshops during RIM Month. Workshops may cover topics such as Email Management, Managing Electronic Records, and Records Retention and Disposition. More information will be forthcoming.

**Financial Policies with Records Implications**

**#2.3.4 Real Estate Transactions and Management**
This policy directs employees to contact the department of Planning+Design+Construction (PDC) in writing (emphasis added) when considering physical expansion or acquisition or disposition of real estate or real property. The Real Estate Services Request Form as well as other PDC forms can be found at [http://www.uc.edu/architect/documents/forms/table.asp](http://www.uc.edu/architect/documents/forms/table.asp). Records related to this policy should be retained for a minimum of six years following the close of the project.

**#2.1.10 - Gifts-in-Kind to the University**
The policy states that "The Controller’s Office must be copied on all gift-in-kind documentation for gifts valued at $5,000 or more to ensure the gift is properly recognized in the university’s financial statements."
Records in the News

Cincinnati to equip top officials with e-readers to save on paper, plans draw some skepticism.
*Fox 59 Indianapolis*, January 5, 2010

Top Cincinnati city officials will be getting electronic reading devices in hopes of cutting the city's annual bill for paper by thousands of dollars.

Documents - some from 1791 - now online
*Cincinnati.com*, December 29, 2009

The proof of that is one of more than 1 million Hamilton County documents - some dating to 1791 - now available online from the Probate Court that will be a boon to genealogy buffs, history researchers and anyone trying to see what happened to great grandpa's belongings when he died.
http://news.cincinnati.com/article/20091229/NEWS01/912300329

Local educators have mixed feelings about GOP's request for personal info
*The News-Herald* (Cleveland), January 3, 2010

Teachers bring work home with them all the time. But whether the details of their home life should be public record is now a matter to be determined by Franklin County Common Pleas Court Judge Daniel Hogan.
http://www.news-herald.com/articles/2010/01/03/news/nh1887592.txt

Audit pans online charter school's records policy
*Columbus Dispatch*, December 23, 2009

The Electronic Classroom of Tomorrow has two conflicting public-records policies

Netflix Sued For Sharing Very Private Data
*The New Ledger*, December 21, 2009

An Ohio woman has filed a lawsuit against Netflix for releasing supposedly anonymous data about movie selections through their service
http://edge.newledger.com/2009/12/21/netflix-sued-for-sharing-very-private-data/

Obama Executive Order Issued to Expedite Declassification
*The National Coalition for History*, December 31, 2009

On December 29, President Obama issued a new executive order (EO 13526) that would dramatically change the way the executive branch handles classified material, reduce over-classification and expedite the release of formerly classified materials to the public.
Ohio Sunshine Law Updates Available from Ohio Attorney General

Ohio Attorney General Richard Corday has released an addendum to the 2009 Ohio Sunshine Laws Handbook, also known as “The Yellow Book.” Although the addendum does not include any changes to the law itself, it does include examples of recent case law in which aspects of the laws were interpreted. The study of case law can be helpful when trying to apply public records regulations to an organization’s own actions. The addendum can be viewed and downloaded from the Attorney General’s website at http://www.ohioattorneygeneral.gov/files/Publications/Publications-for-Legal/2009-Sunshine-Laws-Addendum.aspx. Also available is an updated model public records policy. Individuals can sign up to receive updates to the Sunshine Laws via email from the website. The Ohio Auditor of State’s website also offers information about Sunshine Laws in its Open Government section: http://www.auditor.state.oh.us/services/opengov/default.htm.

Federal Register, Department of Education

October 27, 2009
Institutional Eligibility Under the Higher Education Act of 1965, as Amended, and the Secretary's Recognition of Accrediting Agencies; Final Rule.

This final rule, effective July 1, 2010, includes modifications to record-keeping and confidentiality requirements. Although this rule applies to accrediting agencies and not individual institutions of higher learning, it is important to understand what their record-keeping requirements are in relation to the information they maintain regarding participating institutions. The full text of the final rule can be found at http://frwebgate6.access.gpo.gov/cgi-bin/PDFgate.cgi?WAISdocID=717543282001+6+2+0&WAISaction=retrieve

State ex rel. Perrea v. Cincinnati Pub. Schools, 123 Ohio St.3d 410, 2009-Ohio-4762.


This case concerns semester exams developed and administered by the Cincinnati Public Schools. In line with a strategic plan, the district decided to compel students to take the exams as a measure of the effectiveness of instruction and hired a nonprofit testing agency to develop the exams for a fee of $276,000. A teacher of the district, concerned about the exams, requested copies as public records. When denied, a writ of mandamus was sought. The court decided that the exams are trade secrets and are thus not public records. Decided September 17, 2009
As with most early records, bound journals were used to record student registrations and academic progress. The earliest registration records for the University of Cincinnati in the University Archives are from 1879 for the art and academic departments. Each record was handwritten twice on a perforated registration blank and a copy was detached and given to the student. While bound journals keep records securely together and virtually eliminate lost documents, indexing is required to efficiently locate and use a specific record. The early student records of the University are not indexed, requiring a page-by-page search of the journals to find a record.

Loose papers were even bound to create a single, complete record. Post-bound (think loose-leaf) journals were used later. These allowed journals to be unbound and new records inserted in sequence. Similar types of systems were used such as the Engineering academic recordkeeping system for 1935-1945 shown on the cover. This system, known as a visible file, allowed records to be added, moved, and removed and provided a full visual picture of all records in the system. Card files were a popular means of managing student records and several other types of information into the 1960s.

The earliest known file cabinet was displayed by the Library Bureau at an exhibit of the 1893 Columbian Exhibition in Chicago. Globe-Wernicke of Cincinnati was one of the first companies to manufacture file cabinets, which were then made of wood. Nevertheless, file cabinets were slow to catch on at UC and journals were used to create and store records into the twentieth century. While journals and cards remained the format of choice for student records, contact information, indexes, vendor files, and financial records, there is evidence that lateral filing was employed around the 1920s. Subject files, correspondence and reports from that time period show no evidence of folding, spindling, rolling or binding, suggesting that they were filed in cabinets or possibly in flat drawers.

Handwritten records were the norm into the twentieth century. In 1909 typewritten Board of Directors minutes began to appear but were still interspersed with the handwritten ones. The May 1910 meeting was the first to be completely typewritten. Through the years, the typewriter became more popular but handwritten records never went away. Student information cards for the College of Music and Conservatory of Music were entirely handwritten as late as 1962, when those schools became part of UC.

The 1949 Cincinnatian reveals a lack of love for records creation during the registration process: “That morning we suffered the torture of endless waiting lines, only to be faced with the ordeal of filling out those vast ‘last-name-first’ registration blanks.”

In fact, records creation could still be an arduous task all around. However things were changing. Mimeographs and photocopiers allowed for easier duplication and typewriters continued to make records creation faster and more efficient. But a new tool was on the horizon and with the introduction of the computer came a flood of new records and information to manage.

Next time: The first computer arrives at UC in 1957 and the Records Management Program is established in the 1970s.