

Western Kentucky University WKU Records Management 101

WKU Records Management Program 745-4793

Notes to accompany power point presentation.

Slide 1 – Opening

Slide 2 – Today's Agenda

Slide 3 – Public Records

are defined in KRS 61.870 as all books, papers, tapes, disks, software or other documentation regardless of physical form, which are "prepared, owned, used, in the possession of or retained by a public agency."

Not all public records are open records

The Kentucky Revised Statutes that are listed exempt from public inspection (unless ordered by a court) records of a personal nature where the disclosure would constitute an unwarranted invasion of privacy; proprietary information where disclosure would permit unfair commercial advantage to competitor; police records that would reveal an informant's identity or harm an ongoing or upcoming investigation.

FERPA – Family Educational Rights & Privacy Act – very specific directions about who may and who MAY NOT see a student's records.

HIPAA – Health Insurance Portability & Accountability Act – penalizes wrongful disclosure of individually identifiable health information

More information about these laws and statutes is available at: http://www.wku.edu/library/archive/rm3.php When in doubt consult the WKU Attorney or WKU Records Officer regarding who may and may not see records.

Slide 4 – Records Management

Records have a life cycle – created for specific use, period of heavy use, period of reference and declining activity, retired from use or replaced by more current data at which point they are sent to archives or destroyed after checking the schedule.

Life cycle can be a day, week, month, year, or forever.

Slide 5 - Retention

People often say, "I wasn't sure what to do, so I kept it all, just in case."

1) WKU Records Officer helps you know what to do with all the records.

2) WKU has a records schedule - see slide 6

3) Just in case can blow up in a litigation situation. All existing documents may be requested and if so, must be turned over to the court. There may be documentation that supports WKU's side of the case and there may be documentation that hurts WKU.

Slide 6 – Kentucky State University Records Model Schedule

is a one size fits all records schedule giving the minimum retention period for each records series.

The university records managers meet quarterly in Frankfort to review and revise the schedule. Quarterly updates are posted on the WKU Records Management website: http://www.wku.edu/library/archive/rm2.php

You as creators and care takers of records have input on the schedule. If you disagree with a retention length based on use in your office, or create records not addressed in the schedule – contact the WKU Records Officer.

The Student Learning Contract File is an example of a change that came about from a department. The retention was decreased from 10 years to 3 years after discussion and consultation with university records officers.

The schedule is multi-tiered meaning that it may indicate two retention periods based on where a record is housed; in the office of record or a subordinate unit. See slide 8 for additional information.

The schedule is written generically because it has to be used in all the Kentucky public universities. You will not find SITES listed on the schedule, but you will find U0643 Student Faculty/Course Evaluation. It can be a little challenging however the schedule is full text searchable. Contact the records officer if you have can't find a series listed.

No department or office is expected to create every kind of record found in this 69 page document. It's a tool to be used in conjunction with WKU Policies and Procedures. They govern work flow. The records schedule tells you when to dispose of the records.

Slide 7 – Kentucky State University Records Model Schedule

There are 21 sections in the model schedule.

U0100 General applies to all units – the most basic kind of office records – correspondence, meeting minutes, etc.

Most departments will use portions of the Fiscal, Students/Course, Personnel and Sponsored Program sections when dealing with budgets, student grades, purchase orders, personnel annual evaluations, search committees, student workers and grants.

U0300 Awards can apply equally to departments and university wide award committees.

Slide 8 – Office of Record

is the office which has the most or final authority over a particular records series.

The Registrar oversees all student records and all academic units follow the workflow for gathering and submitting student information and grades.

Accounts Payable oversees most financial records.

Each department is responsible for their individual ProCard purchase records.

Human Resources oversees personnel records, etc.

Your office is the office of record for items created uniquely by the department.

Slide 9 – Anatomy of a Records Series

Series – University Model Schedule series # begin with U to indicate Universities – Kentucky Department of Library & Archives has created many records schedules for the departments of Kentucky Government.

Records Title & Description – examples: Correspondence – Official Correspondence – General Contracts, Leases and Agreements (not including donor agreements, which are covered by Series U2200, Donor Records

Function & Use – brief generic description of why the records are created and how they are used

Access Restrictions – helps you know what should be under lock and key; indicates under what circumstances the records are closed and gives legal citations when they exist. If you are ever in doubt about who may and may not see a record and under what circumstances – contact the University Attorney. All Open Records Requests go through that office.

Contents – gives enough of a list to be able to match the series up to what you have in your office (or not).

Retention & Disposition – retention periods tend to be Permanent in your office or in University Archives Transfer to University Archives after x time or x event Destroy in office after x time or x event

Times are most often – end of the semester, 1 year, 3 years, 5 years, 7 years, 10 years, they are very consistent. "Destroy when no longer needed" can also be an option which basically leaves it to your discretion, based on how you use that particular record in your office.

Examples from the General Schedule:

U0239 – Financial Records Subject to Audit – described as audited records that document the acquisition and disposition of funds during the course of University business. . . .

No restrictions on access.

Contents – list of records included in the series, indicates that this list is not exhaustive.

Retention & Disposition – Destroy record copy after 3 years, or after audit is completed, whichever is longer. Destroy departmental copies after 3 years.

The first sentence applies to the office of record. For most financial records this would be Accounts Payable. For ProCard purchases it is the individual unit.

The second sentence applies to offices that have duplicates of records paid by another office on campus.

U0240 – Financial Records Not Subject to Audit is a companion to U0239.

U0455 – Student Worker Time Sheets – record of time and attendance for each graduate or undergraduate student worker, not including work study students, graduate assistants or teaching assistants. For work study students, see Series U0466 Work Study Files. For graduate assistants and teaching assistants, see Series U0647 Periodic Payroll Reports.

The description refers users to other types of payroll records created for different categories of student workers.

Contents – Students name, social security number, hours worked in pay period, employee signature and signature of supervisor.

Retention & Disposition – Destroy after 3 years or audit, whichever is longer. Department or unit copies may be destroyed when no longer useful.

Payroll is the office of record for this series.

Department copies may be destroyed when no longer useful. For convenience you may want to destroy these at the end of each fiscal year or at the end of each semester depending upon the bulk.

The difference in description of the records and how records are actually filed in an office is an common issue.

Filing systems may be based on person names and contain every document related to an individual worker in the office such as time sheets, performance evaluations, travel vouchers, contact information, curriculum vita, clippings and/or photographs. Each of these record series has a different retention period.

When dealing with mixed files, use the retention of the series that is longest. If there is a series that is permanent you may want to weed the file annually of items that aren't permanent. Or you may wish to create a permanent and nonpermanent file for each person.

Conflicting retention period is another issue. Grant files have a retention of 3 years after submission of final financial report, closure of account and audit unless otherwise specified in the terms of the grant contract. A granting agency may stipulate that the records be kept 5 years. **Use whichever retention is longer.**

The retention times are a minimum requirement. It is okay to maintain records longer than the retention period given when they are useful for planning processes, such as budgeting. It is not okay to keep non-permanent records forever.

Slide 10 – Records Destruction Reporting Form

The website gives information about how to calculate cubic feet. You can report up to three records series at a time. You can report both paper and electronic records at the same time.

The WKU Records Officer reviews each destruction form and grants permission to destroy records or reviews the request with the individual when there are questions or issues. The most common issue is requesting to destroy records one or two years early.

Retain the records destruction reporting forms. They can be used to prove a pattern of compliance with the records schedule in case of audit or litigation.

Slide 11 – Destruction When & How

WKU runs on a fiscal year, but as an academic institution you may want to get into the habit of checking the schedule at the end of each semester and prepare records for destruction Jan. 1 and July 1.

NEVER destroy records in the middle of an audit or litigation. Doing so is a red flag that you may have something to hide. You will know if you are under audit or have a legal issue.

Whenever possible recycle.

Always shred non-permanent records with confidential / restricted information

Don't forget to delete the corresponding digital files, database entries, email and other electronic records on your computer and shared drive. When electronic records are housed on a shared drive, check with all the users before deleting.

Slide 12 – Transferring Records to WKU Archives

Check the schedule for records with "transfer to university archives" dispositions. Do not send active records to the archives. Our records don't circulate once they are here.

Box up records using a cubic foot box. These hold legal folders one direction and letter folders the other. Do not use

oversized bankers boxes.

No hanging files, please – keep them and reuse them in your office. Label the boxes please – office / department, records series, dates of the records, your name and number.

Call the WKU Records Officer! Make an appointment for the delivery of records.

E-records – can be posted on a shared drive – call and make the arrangements.

Small groups of records such as brochures may be sent to WKU Archives using campus mail at the time of their creation.

Slide 13 – WKU Archives

We are here to serve the WKU community's research needs and are open to the general public. We are located in the Kentucky Building. The majority of the requests we get are for photographs, there are over 10,000 images digitized so far. We have nearly 18,000 documents digitized and available through TopScholar.

Slide 14 – Questions / Contact Information

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