BENTLEY HISTORICAL LIBRARY
UNIVERSITY OF MICHIGAN

Records Policy and Procedures Manual

updated January 2019

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Mission and authorization

The Bentley Historical Library ("Bentley") serves as the archive of the University of Michigan. It is the place where the university faculty, staff, students, and members of the public can gather first-hand evidence and data about the University's history, using letters, photographs, ledgers, memos and other primary sources. The Bentley's staff administers, preserves, and services the university's records including records generated by administrative and academic units, committees, commissions, and governance organizations. We also gather records that document student life, the University's athletic and cultural events, and alumni activities.

Selected university faculty, staff, students and alumni have also donated their personal and professional papers to the archives.

As a center for knowledge, discovery, and education, and a publicly funded institution, the University of Michigan has significant stewardship responsibilities related to the millions of records it produces annually. The University is committed to creating and managing the records that are necessary to preserve its historical legacy, to ensure continuity of operations and effective administration, to meet legal, regulatory and fiscal responsibilities, and to optimize its use of space and time.

Definition of university records

Bentley's authority as the university's archives is defined in Section 601.08 and 601.08-1 of University's Standard Practice Guide. This policy defines university records "as all records, regardless of their form, prepared, owned, used, in the possession of, or retained by administrators, faculty acting in administrative capacities, and staff of university units in the performance of an official function"[1].

Why preserving the university's history is important

Only a small proportion of the records that the university creates each year has long-term historical value – perhaps 2% a year. This small core of materials can help explain how or why something happened, and help the community feel connected with the past. It can allow historians, artists, journalists, and genealogists to generate new knowledge about the university's many component parts and the people who have worked, studied or competed here. The archive also provides essential evidence of the institution's legal and administrative obligations, and the university's significance as an eminent public research university. The ability to connect stories from the past to our lives today makes ceremonial events such as inaugurations, commencements, anniversary celebrations, and building dedications more meaningful.

[1] http://www.spg.umich.edu/policy/601.08

Types of records in our care

The university's archives include office documents, still and moving images, sound recordings, databases, newspapers, maps, printed materials, architectural drawings, and more. These records are embodied in many different kinds of media, both analog and digital. In general, we do not collect three-dimensional artifacts (such as historical lab equipment or plaques), and we also avoid collecting widely published materials such as scholarly journals, books, or commercially distributed sound recordings, unless they focus on a Michigan subject.

Our facilities for storing physical and digital records

The Bentley provides safe and secure facilities for storing and protecting the University's records of enduring value. Our climate-controlled physical space provides nearly 65,000 linear feet of records storage. The Bentley also manages the preservation and storage of digital records. The website archive comprises 7.5 terabytes (or 7,500 gigabytes) as of January 2019. Additional digital materials are stored in the University of Michigan's institutional repository, Deep Blue, locally managed servers and through the University Library's DLXS service. In all, Bentley manages more than 119.25 terabytes (119,250 gigabytes) of digital content.

Processing, description, and management of archival materials

After the Bentley receives records from University units, archivists process the materials by putting the materials in good order and eliminating obvious duplication. A transfer will be governed by the transfer agreement initiated when a record group is established. Processing includes the elimination of items judged to be of insufficient historical value to warrant the cost of long-term retention and the arrangement and description of the records.

Archivists usually describe the records in a finding aid. Finding aids are descriptive inventories, indexes, or guides that archives create to describe and to provide access to the contents of manuscript collections or archival records. The archival records of organizations are referred to as a record group or as records, e.g., *Department of Chemistry (University of Michigan) records*[2].

The finding aid provides information about the origin of the collection; a brief biography or historical sketch of the individual or organization; a narrative scope and content note describing the intellectual content of the collection as a whole and its major subdivisions; and a detailed inventory list providing a hierarchical listing of the content.

Archivists create finding aids for university units that summarize all the records, paper and digital, that the unit has transferred. While the paper collections are stored at the library, digital materials are stored in Deep Blue. Links to the finding aids for university units are found on Bentley's website[3] or through the university's library catalog[4].

Finding aids help researchers identify and retrieve information that will help answer their research needs. The Bentley Library participates in collaborative sharing of finding aids with other archival institutions so members of the public and remote researchers can learn about the contents of Bentley's collections and use them.

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[2] https://quod.lib.umich.edu/b/bhlead/umich-bhl-87128
[3] https://bentley.umich.edu/research/catalogs-databases/finding-aids/?eads=UofM
[4] https://search.lib.umich.edu/catalog

We provide access to University records

Using records in Bentley collections

Bentley's expert reference archivists are happy to assist university staff use our collections in the reading room.

There is no charge to use our collections. Patrons are welcome to bring digital cameras into the reading room and in most cases can take digital photos. For a fee, Bentley archivists can make photocopies or can create high-quality scans suitable for publication. Current fee schedules are available on Bentley's website. If you are considering visiting the archives in person, it is a good idea to email the reference desk at bentley.ref@umich.edu a day ahead to be sure that the records that you wish to access are available onsite.

If your research needs are complex and require extensive research, a visit to the Bentley may be appropriate. For example, preparation for a significant anniversary often requires at least a few visits in order to understand the depth and breadth of resources available to you.

If your needs are relatively specific, you can submit an administrative request to the University Archives and Records Management Program. An archivist can find the needed documents. Requests can be submitted to UMrecords@umich.edu.

Another option is to request a loan depending on the volume of material. This option is most suitable when the need is very focused and when a relevant source is readily available. Loans are only available to offices of origin and only through specifically designated representatives. If a loan is agreed upon, archivists will retrieve relevant files and prepare a loan form, which documents the transaction. To request that a loan is set up, contact UMrecords@umich.edu.

Access policy and restrictions

University records are public records and once fully processed are generally open to research use. Records that contain personally identifiable information will be restricted in order to protect individual privacy. Certain administrative records are restricted per university policy as outlined below. The restriction of university records is subject to compliance with applicable laws, including the Freedom of Information Act (FOIA).

For further information on the restriction policy and placing FOIA requests for restricted material, consult the reference archivist at the Bentley Historical Library or the University of Michigan Freedom of Information Office website[5].

Categories of restricted records	
Personnel records	30 years from the date of creation
Student educational records	85 years from the date of creation
Patient/client records	100 years from the date of creation
Executive officers, Dean and Directors	20 years from the date of transfer to the Bentley Historical Library

Digitization

Sometimes units that transfer paper records to the Bentley assume that these records will be automatically scanned and made accessible online. Unfortunately, that is not the case.

We are always happy to accept your born-digital records and to preserve them in that format. In addition, if your unit has worked with ITS or another vendor to scan legacy records, we will accept the digital copies and preserve them in the archives.

We provide guidance on records management

Records Management Program

To assist units in the identification of records of permanent value, the Bentley launched the Records Management Program in 2016. This program provides recordkeeping support and guidance for the university community for all stages in the records and information lifecycle. We can provide training for staff on best practices for the creation and management of digital and physical records and can help identify records of enduring value that should be transferred to the archives. To arrange for a consultation, contact an archivist at UMrecords@umich.edu.

[5] http://www.vpcomm.umich.edu/foia.html

Records retention

The university's Standard Practice Guide[6] provides the most important source of policy on how records should be managed, and how long they should be kept. Unlike many businesses and organizations, the University does not maintain a comprehensive records retention schedule. Instead, several policies and SPG provisions summarize employee's responsibility for managing records.

Authority	
SPG 601.8	University Archives and Records
SPG 601.8-1	Identification, Maintenance & Preservation of Digital Records Created by U-M
SPG 601.11	Privacy and the Need to Monitor and Access Records
SPG 601.12	Institutional Data Resource Management Policy
SPG 601.14	Social Security Number Privacy Policy
SPG 602.05	Use and Release of Donor and Alumni Information
SPG 602.06	Alumni Directories
SPG 604.1	Department Record Retention for Business and Finance Records
SPG 201.22	Recruitment and Selection of all Regular Faculty and Staff
SPG 301.46	Personnel Records -- Collection, Retention and Release
SPG 601.28	Who Holds Copyright at or in Affiliate with the University of Michigan
SPG 500.01	Fiscal Responsibilities
Human Resources	Statement on Stewardship[7]
Regents	Regents resolution creating the University archives, Nov. 1936
Regents Bylaw 11.48	Disclosure of Hospitals' and Health Centers' Records[8]
Health System	Notice of Privacy Practices[9]
Registrar	Student Rights and Student Records[10]

[6] http://spg.umich.edu/
[7] https://hr.umich.edu/about-uhr/statement-stewardship
[8] http://www.regents.umich.edu/bylaws/bylaws.pdf
[9] https://www.uofmhealth.org/patient-visitor-guide/protecting-your-privacy-hipaa
[10] https://ro.umich.edu/records-registration/student-rights-records

The creation and management of records by university units

Best practices for the management of records

After records are created, they enter into a period of frequent use - the active life of records. Active records must be filed so that they are accessible. They are usually kept in the office so that they can be easily consulted. After their active life has ended, records may need to be retained because of legal or financial requirements or because they serve as institutional administrative memory. During this period of inactive life, records may be stored outside of the office, perhaps using a vendor who provides document storage and shredding services.

Eventually, records are no longer needed even occasionally by the offices that created them. At this point records should either be destroyed or, if they have been judged to be of long-term historical value, they should be sent to the archives.

Roles and responsibilities

The first step in creating an effective records management strategy is to determine who will be responsible and what resources will be needed. Although day-to-day record-keeping responsibilities may be delegated to others, the leader of a unit has the following responsibilities:

Ensure that employees have clear guidance about how, when and where records should be captured or managed, appropriate to operations, needs, risks, and all applicable laws and policies.

Ensure that when employees leave the unit, their records are secure and accessible within the unit.

Ensure that records of enduring value (including their own records) are transferred to the Bentley Historical Library on a regular basis.

Each department should have an identified records liaison assigned to manage the department's records and to work with the Bentley. Ideally, this should be someone who has been with the department for some time and understands how and why the records are created and used.

File plans and retention schedules

The next step is to create a file plan which specifies how records are organized and managed once they have been created or received. A file plan lists the records in the unit and describes how they are organized and maintained. Understanding the file plan helps users know where to file their records and helps others know where to find the records they need to complete their tasks.

To create or update a file plan, first, identify all of the records that are needed to document the activities and functions of your office or organization. Conduct a high-level inventory of the materials in your unit. Document, at a minimum where the materials are located, how much material there is of each type, the date ranges, and the format (e.g., paper, electronic, email, film).

This inventory will help identify which materials are records, reference materials, personal papers and images, and extra copies. Seek to be comprehensive: include correspondence, ad hoc faculty committees, etc., even if the storage is not centralized, but is instead in the possession of individuals.

Next match the types of records in the unit's custody to the record retention rules in the Standard Practice Guide, or in the appropriate unit-wide retention schedule. These rules often provide the minimum amount of time for which a record should be kept, though units may have local business reasons for keeping records longer. Make a decision about how long records of particular types should be maintained should and document it.

With the information that has been gathered, the next step is to create a file plan. A file plan helps to delineate activities effectively, identify records consistently, retrieve records quickly, dispose of records no longer needed and transfer historical records. It should answer questions such as which records will be maintained on a shared drive, Google, SharePoint, email or paper files? What responsibilities do chairs of committees have for recordkeeping? Unit leadership? Other special roles? The file plan summarizes the types of records the unit maintains, states who keeps them, where they are kept, how they should be organized, how they are weeded or maintained, and whether they are destroyed after a period of time, or transferred to the archives.

The final step in an effective records management program is to maintain the records in accordance with the file plan:

- File new materials regularly.
- Protect confidential information.
- Clean out inactive records at least annually (as per written procedures).
- Transfer inactive permanent records to the Bentley per retention schedule.
- Clean out superseded or obsolete reference materials.
- Reassign records custodian or liaison roles as necessary.
- Train new (and old) staff -- yearly "green days" are great times to refresh employee's knowledge.

In general, it is easier to administer transfers or destruction of records if a new folder is created every year (e.g., FY2013). You can also include procedures relating to labeling or file naming. You may choose to arrange files entirely by year, using color-coded folders for each year.

Some units maintain a folder listing digitally so that it can be easily amended. They keep a printout for each file drawer in the front of the file drawer. When records are boxed for transfer to the archives, they send a printout of the folder listing and digital file to the archives. This system makes it easy to generate a new set of subject files each year.

Recordkeeping systems and sensitive data

A records system is an information system which captures, manages, and provides access to records over time. At the university, units have many different options for storing information: Canvas, SharePoint, Box, Google, ImageNow, shared drives, and file cabinets to name a few. It is critical that sensitive data should be stored in a system with appropriate safeguards. Units should be aware of ITS's policies relating to sensitive data[11].

File naming

There are two general rules for file organization:

- Be consistent.
- Be descriptive.

Time spent at the beginning of the project defining folder hierarchy and file naming conventions make it easier to keep files organized and findable. Remember that no matter how well organized a storage and retrieval system is designed to be, ongoing training and communication with end-users is necessary.

While files are created in a variety of formats and contain diverse sets of information, all files share a set of universal characteristics.

- Files will need to be accessible.
- Files will be shared.
- Files have a retention period.
- Files will have multiple versions.

*Avoid using special characters in a file name. \ / : * ? " < > | [ ] & $, .*
The characters listed above are frequently used for specific tasks in a digital environment. For example:

- A forward slash is used to identify folder levels in Microsoft products, while Mac operating systems use the colon.
- Periods are used in front of file name extensions to denote file formats, such as .jpg and .doc. Using them in a file name could result in lost files or errors.

Use underscores instead of periods or spaces.
Similarly, spaces are frequently translated in a Web environment to be read as "%20".

For example, `file name.doc` translates to `file%20name.doc`

Some programming languages use spaces to signify the end of a character string, and many software applications don't recognize file names that contain spaces.

Err on the side of brevity.
The length of the file name can play an important role when performing system migrations and file uploads. Depending on the operating system and software in use, file names can contain as many as 256 characters. Others allow far fewer. Generally, 25 characters is a sufficient length to capture enough descriptive information for naming a file.

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[11] https://www.safecomputing.umich.edu/protect-the-u/safely-use-sensitive-data

The file name should include all necessary descriptive information independent of where it is stored.
Files are frequently copied to other folders, downloaded, and emailed. It is important to ensure that the file name, independent of the folder where the original file lives, is sufficiently descriptive.

For example:

- World_War_I\Photographs\PolarBear\0001.tif
- World_War_I\Photographs\Ambulance\0001.tif

In the above example, these are two different photographs. One is associated with the folder Polar Bear and one with the folder Ambulance. However, the file names are the same. If the two files were pulled out of their respective folders, the contextual information would be lost. There would simply be two photographs of the same name. Users would then have to open each photograph in a photo editor to determine the subject of the photographs in addition to researching why they exist and who created them.

For example:

- World_War_I\Photographs\PolarBear\ wwI_photo_polarbear_0001.tif
- World_War_I\Photographs\Ambulance\ wwI_photo_ambulance_0001.tif

Add dates and format them consistently.
A benefit of organizing digital records is to enable accessibility not only by current users but by future users as well. The best way to list the date is based on an international standard. ISO 8601[12] specifies numeric representations of date and time to be used in digital format. The international standard date notation is YYYYMMDD.

- YYYY is the year
- MM is the month of the year between 01 (January) and 12 (December)
- DD is the day of the month between 01 and 31

This format allows ease of sorting and comparing files by date and prevents confusion with other date formats (especially in other formats that use just two digits for the year). For example, this webpage could be named 20190101_FilenamingConventions to reflect that this page was created on January 1, 2019.

Some people find it more useful to have the date at the start of the file name, while others might prefer it at the end. Either way, when used consistently, it is a useful sorting tool when the files are organized.
Dates are also useful when the files in question are being retained due to applicable retention policies and laws. Having the date in the file name makes it much easier to select the file, evaluate it for its ongoing value, and make the decision to delete or preserve it.

Include a version number on these documents to more easily manage drafts and revisions.
The easiest way to do this is to use the letter "v" to represent version number. Then, "v01, v02, v03" can be added as needed to a file, and the main file name can stay the same. This is much more effective than other common additions like "update," "new," "old," etc. An exception to this rule is using "final" to indicate the final version of the document. This can be helpful to identify the most accurate version of the document quickly.

[12] https://www.iso.org/iso-8601-date-and-time-format.html

File arrangement

All records, regardless of format, need to be organized in order to be useful. File cabinets, file folders, and folder labels are all tools to organize paper documents. Similarly, file names, directories, and subdirectories are tools to organize digital records. Like the file cabinet, an organized directory structure can present a hierarchy of folders and sub-folders that logically organize files by content, relationships, purpose, and originator.

The capture and management of electronic records into a file system, usually organized in a series of folders, requires careful planning and structure. Design a file structure hierarchy to ensure that it doesn't become too hard to find information in the hierarchy or ineffective because there are too many records in each folder. A filing structure may be modeled on the functions of an organization and may also use subject themes for parts of the structure.

An organized folder file structure:

Supports records management by providing an understandable and accessible location for all records which encourages users to work within it.

Reduces the risk of critical information being lost.

Motivates users to move records out of personal drives or email accounts where it may be retained or deleted without anyone knowing it existed.

A filing system does not prevent users from placing records in the wrong folder if they have access to it. A filing structure will only be effective if users are able to use it. A poorly constructed filing structure will discourage personnel from using it and exacerbate the records management issues.

Formats for digital files

To ensure that active digital records are accessible for future use it is recommended that units develop and implement a proactive maintenance and preservation plan. The Bentley Historical recommends that units use widely-used, open or non-proprietary file formats when creating digital records[13].

Proprietary formats are formats that can only be used with specific pieces of software or hardware. They may not be usable on different systems. Examples include the word processing programs Microsoft Word and Apple Pages.

If actively used records are in formats that have become obsolete or require specialized software, it may be possible to migrate these to more open formats. Contact ITS or the Bentley Historical Library to discuss potential strategies.

[13] https://deepblue.lib.umich.edu/handle/2027.42/96438

Websites

Web archiving program

Since 2010, the Bentley has been using archival practices to identify, appraise, and select websites that reflect the mission and collecting interests of the university archives. In appraising websites for inclusion in the University of Michigan Web Archives collection, the Bentley seeks websites that fulfill multiple criteria.

1. Websites are created, owned, or used by university units, faculty, or students in carrying out university-related business, functions, or activities.

2. Websites reflect basic functions or activities associated with the university's administration, teaching, research, service, student life, and athletic competitions.

3. Websites complement existing record groups and manuscript collection.

4. Websites fill gaps in collections.

5. Websites contain unique and meaningful content that is periodically updated.

The Bentley uses the service Archive-It[14] to take a snapshot of the website at a particular point in time thus creating an archived copy of the website. Archive-it is designed to crawl websites without interfering with access. The crawler begins from a seed list of entry-point URLs and proceeds via links. Most crawls will be run only a couple of times per year and will last for a few days. Once a crawl is complete, the crawler ceases to interact with the server.

Preserved sites are labeled as an "archived web page" with information about the capture to avoid confusion with live websites.

Challenges in archiving websites

Four types of changes can occur to a web site's content between snapshots:

1. Changes to the content of an individual page without changing its placement in the overall organization of the web site.

2. Wholesale replacement of an individual page (or sections of pages) without changing its placement in the overall organization of the web site.

3. Changes in location of a page (or groups of pages).

4. Combinations of changes of these first three types.

Changes of the first two types (i.e., changes to content without changing the page's placement in the overall organization of the web site) can be treated as a version-control issue. You must decide how to best keep track of the versions of content pages.

The most fundamental, non-automated approach to tracking web site content is to "print and file" a recordkeeping copy. Another non-automated approach to version control is to annotate changes of content pages as a comment in the HTML coding. Another manual approach would be to maintain a log file of content changes of the first two types of changes.

[14] https://archive-it.org/organizations/934

Alternatively, you may use content management software (CMS) to track versions of web content in the first two cases. CMS would also offer limited page view reconstruction capabilities-default settings for the databases that support most CMS software would retain only recent changes.

Limitations to automated web archiving

Archived versions of websites may appear to be incomplete at times. Certain types of content present significant issues for preserving the complete form, functionality, and content of sites. For example:

- Linked content that is stored on different domains or subdomains.
- Dynamic scripts or applications such as JavaScript or Adobe Flash.
- Streaming media players with video or audio content.
- Password protected material.
- Forms or database driven content that requires interaction with the site

Setting up a university website

All university websites and print materials should include a copyright line[15]: You may use either the copyright symbol (©) or spell out the word "copyright."

☐ Make sure web pages are valid and HTML compliant. Website accessibility guidelines are helpful to consult when designing accessible, archivable, websites[16].

☐ If there is a robots.txt file for the site, expressly permit the site to be archived by Archive-It by adding the following instructions to the beginning of the file:

```
User-Agent: cdlwas_bot
Disallow:
```

☐ Use descriptive metadata elements in the HTML headers of sites to provide documentation about the website (titles and descriptions are particularly helpful).

Unit responsibilities

☐ Notify the Bentley a list of websites that should be included in the university web archives.

☐ Provide the Bentley with contact information for the web developer.

☐ Alert archivists to major changes to the website, such as a new layout or design.

☐ Make recommendations to the library about the best time(s) to capture the website during the year based on when content generally changes.

☐ Request captures when content of particular value should be captured outside of regularly scheduled events.

Social media

In addition to traditional websites, social media platforms have been used increasingly for official functions and activities of academic and administrative units at the University of Michigan. In creating and uploading content to different platforms, units should be guided by defined social media and communication strategies. Units must also be mindful of the platforms' terms of service and possible limits to the export or extraction of content. If unique records of administrative or historical value are posted to social media platforms, units

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[15] https://vpcomm.umich.edu/brand/style-guide/editorial/boilerplates

[16] http://webaccess.hr.umich.edu/

should ensure that this information is backed up or remains available in an alternate format. Significant social media content that meets the appraisal criteria of the University Archives may also be captured and preserved using a web archiving service or alternate means if it is technically possible to do so.

Maintenance and long-term preservation

Maintaining digital records over time

University units should make sure that digital records are regularly backed up to guard against accidental loss or deletion of content. Additional copies can provide added levels of security; IT personnel can provide advice on how to implement backup procedures and ensure that copies remain in sync.

To ensure continuity of services and business operations, additional copies should have some geographic distance from one another so that a local outage or disaster does not render all copies inaccessible. Similarly, backups should not be stored on the same machine or server.

If applicable, review the service level agreement with your storage provider so that you understand how digital records will be restored in the event of an extended outage or disaster.

If digital records are maintained on local storage media or servers, implement an equipment replacement schedule (typically every 3-5 years) so that your digital records are not impacted by a hardware failure.

If it is necessary to copy and move large numbers of files and directories, check with ITS for software tools that can securely copy files and validate such transfers. ‘Dragging and dropping’ or ‘copying and pasting’ large number of files may result in the incomplete transfer of files.

Digital storage media

Digital records are best maintained in a managed environment that includes regular system back-ups and a disaster recovery plan. Today, the most common methods of storing digital records are online or offline.

A good example of an online system are shared network drives used by departments and workgroups. The downside to managing records over time online can be the accumulation of records and the associated cost. This type of storage does afford immediate access and retrieval, however, sharing records within a unit or workgroup can be problematic. Care must be taken to ensure records are only accessed by those with the necessary permissions.

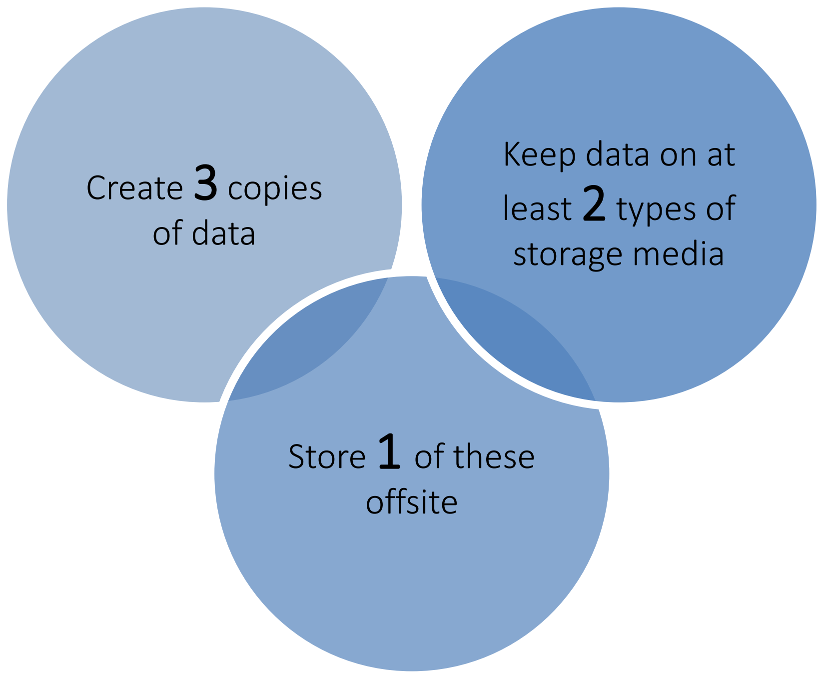
Cloud storage is another method of online storage that has become popular in recent years. Services such as Google Drive, Box, and DropBox all offer convenient, user-friendly methods for storing data. They can be an important part of any plan by providing offsite storage of data, but it should not be the only location where critical records are stored. As with local network storage, care must be taken to ensure records are only accessed by those with the necessary permissions.

For digital records that are stored offline, the best storage media include magnetic tape or external hard drives. Optical media, such as CDs and DVDs, are no longer recommended because of the numerous preservation issues associated with them. Recent studies have shown the lifespan of optical media can be as little as two years. Flash-based storage, commonly described as “jump drives,” “USB drives,” while convenient for short-term storage and transferring data, are not recommended for long-term storage.

Hard drives and tape drives require active maintenance. They should be periodically examined to ensure the integrity of the data. The physical interfaces for all such devices periodically change, and any data should be transferred to a new device before it becomes obsolete.

Storage media, such as hard drives and tapes, have become somewhat more forgiving to their physical environment in the past. However, to minimize any potential risks, they should still be stored in a controlled environment.

Security is still a factor with offline media. Access to physical media should be limited to make sure that media is not damaged or stolen. An essential part of any storage strategy is ensuring that records are adequately backed up. A simple way to remember how to back up data safely is to use the “3-2-1 rule”.



For locally maintained storage media, units should implement a regular replacement cycle (typically 3-5 years) to ensure that hardware or media failure does not result in data loss.

Special rules for particular records

Financial records

The management of financial records, including supporting documents (such as purchase orders, personnel appointment forms, service unit billing statements, and receipts) and summary financial reports, must conform to the retention and disposition guidelines found in SPG 604.01.

It is the responsibility of the generating unit to follow the SPG in the disposition of financial documentation. Most financial documentation may be disposed of at the conclusion of the appropriate retention period with the exception of summary budget material which should be reviewed by a Bentley archivist for possible transfer to the university archives. Units should consult with Financial Operations if they cannot conform to the SPG due to the relocation, downsizing, or discontinuance of the unit.

Grant files

Records of grants from external funding sources are administered through the Office of Research and Sponsored Projects (ORSP) and are maintained in ORSP' s central files. Documentation of internal grants, which are not administered through ORSP, should also eventually be placed in the archives.

Documentation of grants should be maintained by the unit administering the grant, such as the Office of Research and Sponsored Programs, the Horace H. Rackham School of Graduate Studies, or the Medical School as long as necessary to satisfy legal, administrative, or fiscal requirements. When those requirements have been fulfilled, grant files should be transferred to the archives by the unit administering the grants. They may be transferred in paper or digital formats.

Grant files should include:

- Contract documents
- Proposal
- Substantive correspondence
- Final report

Oral history recordings and transcripts

Oral histories represent a valuable historical resource if they are conducted and documented properly. In order to enhance the research use of oral histories placed at the Bentley, the following procedures should be followed.

- ☐ The Bentley Historical Library will not accept oral histories in the absence of a release form signed by the interviewee and a donor form signed by the interviewer. By signing the release form and donor form, the interviewee/interviewer:

    - Grants researchers physical access to the recordings and/or transcripts, or authorizes restrictions, if any, which limit access;

    - Grants copyright for the recordings/transcripts to the Board of Regents of the University of Michigan or retains copyright.

- ☐ Oral histories may be deposited on audio or videotape. The Bentley maintains current recommendations for digital audio and video formats.
- ☐ The interviewer, interviewee, date, and place of interview should be identified both on the carrier/metadata and in the recording itself.
- ☐ An index of topics covered and/or a complete transcription of the interview should be included.
- ☐ Interviewers should test the recording at the beginning of the interview session to assure the audio and visual quality of the recording.

Patient/client records
Patient/client records are those records created by university units in the course of the interaction with persons who are receiving medical or psychological counseling and treatment and with persons seeking educational or vocational counseling.

Legislation and judicial rulings have defined patient/client records as protected by an individual's right of privacy which in Michigan is considered to end at death. Privacy is protected by federal law under the Privacy Act of 1974[17], the Health Insurance Portability and Accountability Act (HIPAA)[18], by state laws (specific statutes have been written for specific types of records, i.e., adoption records), by Regents' Bylaw 11.48[19], and the UMHS Notice of Privacy Practices[20].

It is the responsibility of the generating unit to create, maintain, provide or limit access to, and dispose of patient/client records per applicable law and university regulations. Generally, the archives does not accept patient/client records. However, the archives does hold selected patient/client records which are restricted for one-hundred years from the date of creation at which time the individual's right of privacy is presumed to have ceased due to death.

E-mail
As useful as email is for conducting university business, email systems are not recordkeeping systems in and of themselves. The university's preferred systems, Gmail and Outlook, lack functionality for the convenient identification and transfer of email records to secured filing systems. Many problems can arise when electronic mail is not managed, resulting in inefficient information retrieval, and the loss of important communications.

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[17] https://www.justice.gov/opcl/privacy-act-1974
[18] https://www.hhs.gov/hipaa/index.html
[19] http://www.regents.umich.edu/bylaws/contents-detail.html
[20] http://www.med.umich.edu/hipaa/npp-foreign.htm

The most important step staff members can take in the management of their email is to separate personal from professional correspondence. Personal (non-work) records created or stored by university employees on university systems remain the property of the employee. However, it is the responsibility of each employee to organize their records in a way that separates their personal and work information as much as possible and enables work records to be retrieved if a legitimate business need arises. If the university needs to retrieve records from an email account, the IT User Advocate office is charged with identifying those records which belong to the University. The easiest way to isolate personal and professional communications to use two different e-mail accounts. Alternately, email filter can be used to tag messages to or from family members as personal automatically. Contact 4-HELP for guidance in using filters.

Just as with traditional paper records, a good place to start in the management of email is to develop guidelines on how email records will be classified, retained, and stored. Significant email messages should be filed in a way that will ensure that the communications are easily retrieved. Some units create PDF copies of email messages and interfile them with digitally maintained subject files in a shared recordkeeping system. Other offices print to paper and file significant communications, particularly when the correspondent is an executive officer or dean.

Much of the responsibility for the daily management of electronic mail communications will fall on individual employees. Roles and responsibilities should be clearly defined. University leaders carry a special responsibility to ensure that their decisions are documented outside of email systems. Ideally, more than one person should have access to an executive's official correspondence. The executive should identify significant messages related to university business and plan to turn them over to the Bentley at the end of his or her tenure. Email records of executives are considered sensitive information, and while subject to FOIA requests, are restricted at the Bentley per its executive access restriction. Under the executive restriction, emails are available only to the creator or to his or her successor in office according to Bentley's access policy.

Techniques to preserve email accounts in Gmail change over time. Contact the Bentley to learn how a leader's email can be preserved, or contact the IT User Advocate's office to snapshot the account.

Human resources records

Records kept by Human Resources and the custodians of personnel files or records in various departments, schools, colleges or other university offices are university records and are subject to the regulations covering personnel records as found in Regents' Bylaw 14.07[21] and the Standard Practice Guide section 201.46[22]. The collection, availability, and disclosure of the contents of personnel files are governed by regulations established by the university and by applicable laws.

It is the responsibility of the hiring unit to follow the Standard Practice Guide in the collection, maintenance, disclosure, and disposition of personnel records.

Due to limited space, the archives does not routinely accession or store personnel folders. Personnel files related to faculty and staff who have made significant contributions to their units, particularly if they include biographical materials, sabbatical reports, and award nominations may add to the historical documentation of the unit and should be reviewed by the archives before destruction.

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[21] http://regents.umich.edu/bylaws/bylaws14.html

[22] http://spg.umich.edu/policy/201.46

Student educational records
The Federal Family Education Rights and Privacy Act (FERPA) defines "educational records" as all records (with a few specific exceptions) which directly relate to a student and are maintained by the university or by a party acting for the university.

The University of Michigan's Student Records Policy was developed in accordance with FERPA, defines student records as "all personally identifiable student files, recorded in any medium, which are assembled in the execution of official University activities."

The official student educational record (transcript) is maintained by the registrar's office or by the Medical School. More than fifty other university units create and hold documents which are considered to be the student educational record under the definition of FERPA.

Kinds of materials to transfer to the archives

Central administrative units

Records documenting the development and implementation of university policy by central administrative offices are necessary to the continuing functioning of the university and to provide an accurate reflection of the activities and achievements of the institution.

It is the responsibility of university administrators, in cooperation with the Bentley, to ensure that records are maintained properly and that those records that document the history and achievements of the university are transferred to the archives for permanent retention.

Responsibilities

1. Each central administrative office should designate a staff member to act as records liaison.

2. The records liaison should maintain regular contact with the Bentley and should implement the periodic transfer of records to the archives.

3. Specific types of records that should be transferred to the university archives include:
   a. Central topical file
   b. Official's correspondence including e-mail
   c. Records documenting unit reviews, including accreditation
   d. Executive and other committee minutes
   e. Reports, including annual reports
   f. Fundraising strategy records
   g. Photographs, preferably identified by the unit
   h. Publications of the unit, including newsletters
   i. Audiovisual material
   j. Records of search and executive review committees which were initiated by the unit

4. Records that should not be transferred to the archives, but which should be discarded when their administrative use is completed include:
    a. Duplicate items
    b. Vorrespondence and administrative files documenting routine activities such as room scheduling and travel logistics
    c. Non-university printed material retained as a reference file
    d. Routine financial records

5. The records liaison for each unit should ensure that files are managed in such a way as to promote the orderly transfer and/or disposal of inactive records.
    a. Certain genres of records maintained in central administrative offices may not have long-term historical value, but do need to be maintained in order to satisfy financial or legal requirements. Such records include financial records, grant documentation, and personnel records.

    b. Certain records such as patient/client records, personnel records, and the student educational record as defined by the Family Educational Rights and Privacy Act (FERPA) have special access regulations both as active records and as inactive records.

6. The records liaison should consult with Bentley archivists if there are questions about the historical value of specific records.

Colleges and schools

Records documenting the development and implementation of university policy by administrative offices of colleges and schools, and by faculty acting in administrative positions, provide important evidence of the activities and achievements of the institution. Managing them properly also ensures that the University honors its commitments and functions smoothly. It is the responsibility of administrators of colleges and schools in cooperation with the Bentley to see that records are maintained properly and that records which document the history and achievements of the college or school are transferred to the archives for permanent retention.

Responsibilities

1. Each college and school should designate a staff member to act as records liaison for the unit.

2. The records liaison should maintain regular contact with the Bentley and should implement the periodic transfer of records to the archives.

3. Specific record groups that should be transferred to the university archives include:
    a. Dean's topical file
    b. Dean's correspondence including email
    c. Records documenting unit reviews, including accreditation
    d. Executive and other committee minutes
    e. Reports, including annual reports
    f. Fundraising strategy records
    g. Photographs, preferably identified by the unit
    h. Publications of the unit, including newsletters
    i. Audiovisual material

4. The topical files kept by associate and assistant deans, and the files maintained by committee chairs should be transferred to the archives if the records in their files illuminate policy development and implementation. The Bentley staff will review those files and appraise their historical value.

5. Records that should not be transferred to the archives, but which should be discarded when their administrative use is completed include:
    a. Duplicate items
    b. Correspondence and administrative files documenting routine activities such as room scheduling and travel logistics
    c. Non-university printed material received by the unit and retained as a reference file
    d. Documents distributed widely to university units but not generated by the unit
    e. Routine financial records

6. The records liaison should consult with Bentley if there are questions about the historical value of specific records.

Departments, institutes, libraries, museums, centers and programs

Records documenting the development and implementation of university policy by unit chairs, directors, staff, and by faculty acting in administrative positions, provide important evidence of the activities and achievements of the institution. Managing them properly also ensures that the university honors its commitments and functions smoothly. It is the responsibility of administrators and staff of these units in cooperation with the Bentley to see that records are maintained properly and that records that document the history and achievements of the units are transferred to the archives for permanent retention.

Responsibilities

1. Chairs and directors should designate a staff member to act as records liaison for the unit. The records liaison should maintain regular contact with Bentley and should implement the periodic transfer of records to the archives.

2. Specific record groups that should be transferred to the university archives include:
    a. Chair's or director's topical file and correspondence
    b. Committee records, particularly executive and curriculum committees
    c. Faculty or staff meeting minutes
    d. Documentation of reviews of the unit
    e. General development files
    f. Reports, including annual reports
    g. Identified photographs
    h. Newsletters and other publications of the unit

3. Records that should not be transferred to the archives, but which should be discarded when their administrative use is completed include:
    a. Duplicate items
    b. Correspondence and administrative files documenting routine activities such as room scheduling and travel logistics
    c. Non-university printed material received by the unit and retained as a reference file
    d. Documents distributed widely to university units but not generated by the unit
    e. Routine financial records

4. The records liaison for each unit should ensure that files are managed in such a way as to promote the orderly transfer and/or disposal of inactive records.

5. Certain genres of records maintained in departments, institutes, libraries, museums, centers, and programs may not have long-term historical value, but do need to be maintained in order to satisfy financial or legal requirements. Such records include financial records, grant documentation, and personnel records.

6. The records liaison should consult with Bentley if there are questions about the historical value of specific records.

Executive search and review committees

Executive search and review committees are those committees constituted to hire or review leaders at the university such as executive officers, deans, directors or other executives. When hiring non-executive employees, hiring managers or committees often create a local "job file" for records related to the work of filling a position. These files may contain job descriptions, postings, and advertisements, pre-screening documentation, search firm correspondence, job applications, lists of candidates to be interviewed, interview questions and notes, feedback from faculty, staff and students, visit itineraries, hiring recommendations.

Records of search and personnel-related review committees are official university records. Documents created by search and review committees are crucial to understanding the history of the academic and administrative mission of the university. They provide insight into the evaluation of past direction and the future course of units or programs. They are important reference documents for future administrative activities. The deliberations and correspondence of these committees document frank and candid expressions of scholarly and professional judgments. The illumination of these judgments, which make the records highly sensitive, contribute to their value as historical documentation of the mission of the university.

Responsibilities

1. The activities of executive search and review committees should be documented, and the documentation should be transferred by the appointing authority in charge of the committees to the Bentley at the completion of the committees' tasks.

2. Chairs of search and review committees are encouraged to invite a member of Bentley's staff to speak with the committees at an early stage to discuss the creation, maintenance, archival retention, and disposition of the committees' records. Bentley archivists may be able to provide position descriptions, interview agendas, and other materials from previous searches for the committee's consideration.

3. All documents created or assembled by the search committee - one copy only - should be transferred to the archives at the end of the search. The archives will hold the complete record for six years in compliance with affirmative action regulations. At the end of six years, the documents will be processed, with retained records added to the archival holdings of the unit conducting the search. Search records are restricted for thirty years from the date of creation.

Campus-wide committees

Records created by committees constituted to research and recommend policy on issues with campus-wide implications are official university records.

Records documenting the activities of campus-wide issues committees provide an understanding of the procedures used in the development of policies adopted by the university community. It is the responsibility of such committees in cooperation with the Bentley to ensure that these records are maintained properly and that they are transferred to the archives for permanent retention.

Responsibilities

1. It is the responsibility of the chair to document the work of campus-wide issues committees and to transfer that documentation to the archives at the completion of the committee's work.

2. Chairs are encouraged to invite a Bentley archivist to meet with the committees at an early stage to discuss the creation, maintenance, archival retention, and disposition of committee records.

3. The following records series should be transferred to the archives:
    a. Charge or statement of goals of the committee and committee roster
    b. Agendas and minutes of meetings
    c. Publicity, flyers, meeting announcements, news releases
    d. Substantive correspondence
    e. Transcripts or videotapes
    f. Texts of recommended policies
    g. Reports, including the final report

Faculty and student committees and organizations

The activities of faculty and student committees and organizations are integral to the university community. It is the responsibility of officially constituted committees (whether they be academic, athletic, governance, or social committees and organizations), in cooperation with the Bentley, to ensure that their records are adequately maintained and that they are transferred to the archives for permanent retention.

Responsibilities

1. Chairs of faculty and student committees and organizations are encouraged to invite a Bentley archivist to discuss the creation, maintenance, archival retention, and disposition of records with the committee or organization.

2. Records of such committees and organizations should be transferred to the Bentley when they are no longer active records.

3. The following records should be transferred to the archives:
    a. Agendas and minutes
    b. Substantive correspondence
    c. Newsletters and other publications
    d. Identified photographs
    e. News releases
    f. Reports

Faculty papers

Faculty papers provide important evidence of the creation and transmission of knowledge at the university. The Bentley collects the personal papers of representative faculty in an endeavor to document the intellectual environment at the University of Michigan.

The program's primary collecting objective is to document the careers of faculty members who meet some or all of the following criteria:

- Have been valued teachers
- Have defined significant ideas
- Have undertaken important research
- Have carried out exemplary service to the university, the state or the larger community

The program will give the highest priority to those faculty papers which can be open for research. The following types of material found in faculty papers are considered to have potential historical value:

- Correspondence of a substantive nature, including email
- Lecture notes and curriculum materials
- Records of departmental or university-wide activities
- Speeches
- Research-related records
- Bibliographies, vitae, photographs, films and audio and video recordings

The transfer process

Units that have not previously transferred records to the Bentley Historical Library should contact the University Archives and Records Management Program to speak with an archivist or to request a records appraisal.

Identify records for transfer

Transferring unit records to the archives ensure that its contributions to the university are remembered. Transferring records on a regular schedule can minimize inconvenience and improve efficiency. We recommend reviewing unit records annually. Some units incorporate a review annually as part of end-of-year activities, such as an office Green Day and in preparation of the annual report.

Prepare your records for transfer

Records can be found in either tangible or digital formats. Examples of tangible formats include, but are not limited to, paper-based documents and photographs, and removable media such as thumb drives, floppy disks, and CDs. Digital records most often refer to records that can be viewed on a screen. These exist either because a digital version has been made from paper ("digitized") or because they were originally created in a digital form ("born-digital").

Paper-based records and removable media

Paper-based records and removable media should be packed carefully in boxes. Paige boxes measure 10 x 12 x 15 inches and are provided upon request at no cost. In order to keep the weight of the boxes manageable, we recommend that boxes are packed legal-width, rather than letter-width.

Digital records

Acceptable methods of transferring digital materials to the University Archives include both cloud transfer and storage device delivery. U-M Box is a preferred service when transferring digital files. When the transfer process is complete, a receipt of transfer from an archivist will be sent and the folder closed. For very large digital transfers containing rich media such as images, audio, or video, it may be necessary to use a hard drive in order to preserve the integrity of the files.

Complete a records transfer memo

The records transfer memo lets archivists know who has prepared the transfer, from which unit the transfer has come, and what materials might be found in the transfer. The description of the records is essential, but it only needs to be a general description of the records being transferred and a general date range. Keep one hard copy in-unit records and email another copy to the archivists.

Complete transfer

Contact the archives when the transfer has been prepared.