Manage your Records
Records Management Training
Learning Objectives

• Learn to identify and manage the records in your custody.
• Understand the records’ lifecycle
• Review policies and procedures governing University Records
• Learn about the University Archives (who, where, why?)
• Feel confident that you can begin looking at your records and make decisions for either destruction or permanent retention.
What is Records Management?

Records Management is the process of creating, maintaining, using and disposing records in an organized way.

Records Management ensures an orderly and efficient flow of information, which enables the University to run all the functions efficiently and successfully.

Records Management is knowing what you have, where you have it and how long you have to keep it.
They learned it the hard way…

In 2017, the Financial Industry Regulatory Authority (FINRA) fined banking giant Morgan Stanley $13 million, partly because they failed to preserve and maintain their clients’ records properly.

In a wrongful-termination suit, a court ordered a Fortune 500 company to turn over all e-mail messages that mentioned a former employee’s name. The company had no records-retention policy in place and was faced with having to search 20,000 backup tapes containing millions of messages, at a cost of $1,000 per tape. The cost of this search could have been reduced dramatically, if the company had an effective document-retention policy.

In connection with an acquisition, the Hearst Corporation failed to provide documents fully responsive to the Hart-Scott-Rodino notification requirement. The FTC instituted a challenge to the acquisition, and Hearst paid a $4 million fine and $19 million in disgorgement penalties. Hearst found the documents after the acquisition had been consummated.

In a patent-infringement case, a court held that Rambus, Inc., had engaged in litigation misconduct, after a Rambus executive testified that Rambus had implemented a records-retention policy, in part, to destroy documents that might be harmful in patent-infringement suits.
Why should I care about Records Management?

Because….

- It helps you to do your job better: you can find the information you need, when you need it. (It saves you time too!)
- It reduces costs, particularly space costs, by ensuring you don’t keep any more records than you have to, and that you know when you can delete or destroy them;
- It increases usable office space through the elimination of unnecessary file storage;
- It provides institutional accountability and timely access to information;
- Records are evidence of all University transactions and operations;
- It can reduce delays in responding to discovery (litigation)
Records Management – Key Terms

**Records** (University Records)

Records life cycle

Record Retention period

Records Retention Schedule

Data (records) Custodians

Records Managers

Records Inventory, Records Survey

Disposal

Archiving
University Records are all official materials created in the course of the university’s operations.

Records created, received, or recorded outside the scope of employment with the University are not considered University Records.

University Records can come in various formats:
- Handwritten notes, paper documents,
- Digital files, emails
- Photographic media,
- Electronic files in systems and applications

“Evidence of activity or transaction”
“Proof (evidence) that something happened”
Records vs Data – what’s the difference?

**Data:** pieces of information, which can exist in a variety of forms.

Examples of data:
- Personal data (name, SSN, DL, address, health information, etc.)
- Health data
- Financial data (credit card, bank info)
- Facilities data (campus map, buildings, addresses, parking info, emergency phones, etc.)

**Record:** Any kind of documented evidence of an activity or transaction.

Records are “snapshots” of data, at a particular time, for a particular **purpose**.

Examples of Records:
- Student admission forms
- Correspondence (Memoranda, Letters, E-mails)
- Data files, Reports, Meeting minutes

“Records contain Data.”
The Records Management Policy applies to staff, faculty, students, contractors – all who create and maintain records on behalf of the University.

Policy requirements:

- Management of University records, in a systematic and logical manner
- Compliance with policies and standards governing university data
- Compliance with the University Records Schedule
- Designated “records managers’ for all School and Departments
- Creation and implementation of Records Management Plans by all Schools and Departments.
- Records Survey (inventory)
Roles & Responsibilities

**Records Custodians** are individuals who create, use and maintain University records in the ordinary course of business. That’s ALL of us.

**Data Custodians** are the GW Schools and Departments who own the data. Data Custodians are responsible for appropriate controls, for access, use, transmission, and disposal of University Data.

**Records Managers** are the individuals designated by the Data Custodians to:
- Ensure compliance with the Records Management Policy;
- Conduct periodic Records Surveys;
- Implement the School/Division’s Records Management Plan;
- Serve as records management SME for the School/Department;
Records Management at GW

University Privacy Office

University Archives

GW Information Technology

GW Procurement

GW Libraries
Records Lifecycle

Create  
Classify  
Store  
Archive  
Maintain and Use  
Dispose  

Creation or Receipt  
Maintenance and Use  
Disposition  
Transfer  
Destroy
Creating Records

A large amount of records are generated within the University on a daily basis in various ways:

- typing/word processing of a document or an email
- construction of a spreadsheet
- recording of a meeting
- entering a transaction within an enterprise system
- the receipt of documents, spreadsheets, emails.

Consider the following, after creating or receiving records:

- Is it an original record or a copy?
- When storing it, title the record consistently with it’s content and in line with related records.
- Apply a classification level to the records, in accordance with data therein.
- Establish appropriate access to the record in accordance with it’s classification level.
Records Classification

University records should be classified in accordance with the Data contained therein (per the GW Data Management and Protection Standard).

Data Classification helps identifying the level of privacy and security protection to be applied to University Data (and records) and the scope and means in which the data/records can be shared.

PUBLIC
- Low risk
- Little or no controls are required to protect the confidentiality of Public data, yet, some level of control is required to prevent unauthorized modification or destruction of it.
- Open Access

Examples:
- Announcements / press releases
- Public event information
- Public directories and maps;

RESTRICTED
- Moderate risk
- Must be protected from unauthorized access, use or disclosure due to university policies, contract, or designation, or due to proprietary or privacy considerations.

Examples:
- Course information / schedules;
- Access codes, legal records and contracts; general ledger data;
- Facilities records

REGULATED
- High risk
- Must be protected from unauthorized access, use or disclosure due to university policies, contract, or designation, or due to proprietary or privacy considerations.

Examples:
- Student academic records;
- Protected Health Information;
- Personal Identifiable Information (e.g. SSN, DL, DoB)
Choose the appropriate storage based on data protection and integrity requirements for your records.

**GW Data Protection Guide**

<table>
<thead>
<tr>
<th>Information Category Risk Category</th>
<th>Regulated High Risk</th>
<th>Restricted Moderate Risk</th>
<th>Public Low Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Storage</strong></td>
<td>May be used, stored, shared, or processed only on GW hosted or approved servers or services (such as file sharing or collaboration services, cloud-based email services, cloud-based backup and recovery). May be stored in the following GW systems: GW Box, GW Documents, Windows File. Regulated data in physical form (paper, media) should be locked at all times and access should be restricted only to authorized users, with a legitimate business need.</td>
<td>May be stored on departmental, GW IT-hosted, or approved cloud-based systems.</td>
<td>No limitations</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Must be stored in the following GW systems: GW G-Drive, GW SharePoint, GW Box and GW Docs. Restricted data in physical form (paper, media) should secured at all times and access should be restricted only to authorized users, with a legitimate business need.</td>
<td></td>
</tr>
</tbody>
</table>

Contact your IT Department and/or GW Information Security for further instructions.
Records inventory

KNOW the records you have!

Create a records inventory by listing the categories of records you created or received and are maintaining as part of your daily job responsibilities.

This inventory should include all types of records you maintain: physical records—papers, blueprints, publications, etc. and electronic records—computer files, databases, emails, servers, etc.

<table>
<thead>
<tr>
<th>Record Title</th>
<th>Description</th>
<th>Classification</th>
<th>File location</th>
<th>Media type</th>
<th>Retention</th>
<th>Expiration Date</th>
<th>Dispose</th>
<th>Document</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policies</td>
<td>University Policies</td>
<td>RESTRICTED</td>
<td>GW Box Folder</td>
<td>Electronic</td>
<td>Permanent</td>
<td>N/A</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Tuition 1235</td>
<td>Tuition Records for 1235</td>
<td>REGULATED</td>
<td>GW Box Folder</td>
<td>Electronic</td>
<td>5 Years</td>
<td>3/16/2025</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>12A Course Eval.</td>
<td>Course Evaluations</td>
<td>REGULATED</td>
<td>File cabinet 15</td>
<td>Paper</td>
<td>10 Years</td>
<td>3/16/2030</td>
<td>X</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Review and revise your Records inventory periodically, to captures all records and identify records flagged for destruction or archiving.

REPORT REGULATED DATA to the GW Privacy Office!
The Records Management Policy requires that all University Schools and Departments (Data Custodians) establish an appropriate Records Management Plan.

Guiding Principles:

- **Accountability**: Data Custodians will oversee and be accountable for the Records Management Plan.
- **Designated records managers**
- **Records Surveys** – Know the data you have
- **Compliance** with University policies and standards governing university data and records:
  - Data Classification and Protection
  - Privacy and Data Protection Policies
  - University Records Schedule
- **Reporting REGULATED Data** (records)
Records Maintenance and Use

Records form the core of the university, as they provide information and evidence on GW’s activities and operations.

Maintaining records is a key activity. If full and accurate records are not maintained effectively, our decision making processes may suffer.

Consider the following, when maintaining your records:
• Knowing what records are held (Records Inventory)
• Accessibility of records (where, what format?)
• Classification
• Protection of records (access, distribution)
• Records should remain usable for as long as they are required
• Retention Requirements
Data Management and Protection Standard

The Data Management and Protection Standard is a framework for classifying university data, based on its level of sensitivity, value and criticality to the university, and protecting it, as required by the Personal Information and Privacy Policy, Records Management Policy, and the Information Security Policy. This standard applies to students, faculty, staff, contractors, and any persons or entities who generate, collect, use, store, or process personal information on behalf of the University. Data management begins with the creation or collection of data and continues through the entire data lifecycle. As such, data management consists of the following main phases:

1. Data Inventory
2. Data Classification
3. Data Protection
4. Report Regular data

A data inventory is a detailed record of the data maintained by the university ("university data"). The data inventory process consists of identifying and recording basic information about data in your custody, such as: data owner, data format, record category and retention requirement (per the University Records Schedule), storage, access, transfer, purpose of processing, etc.

The Data Inventory Template (data) should be used to capture all relevant information about your data.

A data inventory is valuable because it provides information on what data you have, where it’s located and who has access. It also helps identify information that must be safeguarded under requirements of laws (e.g., FERPA, HIPAA, GLBA), regulations (GDPR), industry standards and university requirements and policies.

A data inventory is a prerequisite to the records survey which enables records managers to maintain university records in accordance with the Records Management Policy.

For assistance with completing or reviewing your data inventory, contact the GW Privacy Office.
**Records Retention**

**Retention Period** – represents the period of time (years) a record should be kept, or “retained”, irrespective of format, before its final disposition.

*Retention Period means how long you need to keep the record.*

**Records Retention Schedule** - outlines records retention periods.

The [University Records Schedule](#) provides timeframes for the retention and disposal of University Records in accordance with applicable legal, regulatory, accreditation, and other standards, including recommended best practices.

<table>
<thead>
<tr>
<th>RECORDS</th>
<th>CUSTODIAN</th>
<th>RETENTION PERIOD</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accreditation Records</td>
<td>Office of the Provost; Originating School</td>
<td>Permanent*</td>
</tr>
<tr>
<td>Admissions Brochures and Advertising Records</td>
<td>Originating School; University Graduate Admissions; Graduate Enrollment Management</td>
<td>3 years*</td>
</tr>
<tr>
<td>Course Evaluations</td>
<td>Survey Research and Analysis; Originating School</td>
<td>10 years</td>
</tr>
<tr>
<td>Program Accreditation/ Certifications</td>
<td>Originating School</td>
<td>Permanent*</td>
</tr>
<tr>
<td>Tuition and Fee Records</td>
<td>Finance</td>
<td>5 years</td>
</tr>
<tr>
<td>University Bulletin</td>
<td>Registrar; Academic Planning and Assessment</td>
<td>Permanent*</td>
</tr>
</tbody>
</table>
Depending on their historical, administrative or legal value to the university, when they reach their end of life, records can be disposed of or archived.

**Archiving** - Records that have an enduring historical value, will reside in the University Archives, where they will be preserved for future research and use.

**Destruction / Disposal** (e.g. trash or recycling bin, shredding, incineration, deleting of electronic files, shredding of optical disk, etc.)

Appropriate records disposal, in accordance with their classification:

<table>
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<th>Public Low Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destruction/Disposal</td>
<td>Must be disposed of by using GW IT approved measures to protect against unauthorized access or disclosure. Regulated information must be destroyed in a manner such that the information cannot be reconstructed nor be readable.</td>
<td>Must be disposed of using GW IT approved measures to protect against unauthorized access or disclosure.</td>
<td>No Restrictions</td>
</tr>
<tr>
<td></td>
<td>Contact GW Information Security for further guidance on destruction / disposal of electronic regulated and restricted data. Contact GW Procurement for shredding services.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
A records clean-up day is an opportunity to bring your team together to keep your department running smoothly.

Staff will clean up their working files, destroy expired records, and prepare records for transfer to the University Archives.

The benefits include freed up office and server space, compliance with University policies, the ability to more easily find active records needed for day-to-day business operations, and an organized email inbox.

Things to consider when planning a records clean-up day:
• Choose a good day for clean-up (the least hectic or when the unit can be closed for the day)
• Order supplies in advance (shredding boxes, recycling bins, boxes, dollies, etc.)
• Communications - everyone needs to be aware of the event and support it. Include information about what staff will need to do to be prepared for the records clean-up day;
• Consider allowing staff to dress casually for the occasion;
• Compile information about University policy, records retention, and destruction best practices to hand out to participants on the day of the event
What are Archives?

- Collections of unpublished materials (usually)
- Paper, audiovisual, digital, or a mix
- Don’t usually include objects (but sometimes will)
What are the **University Archives**?

George Washington University Archives Collections

[Back to Topical Listing of Collections]

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What is permanent retention?

- No longer actively being used by an office or department
- Out of retention period
- Will be kept forever by the University Archives (or as long as George Washington University exists)
Restrictions

Restrictions on Access

Non-public materials in this collection are closed for 50 years from the date of creation. Currently, this includes portions of the Elliott and Trachtenberg series. See notes at the start of these series for assistance in identifying restricted portions of the collection.

Permission to use restricted materials may be obtained from the office of the president; please contact archives@gwu.edu to facilitate permission.
Contact

Cristina Grigore: privacy@gwu.edu  - Office of Ethics, Compliance & Privacy

Brigette Kamsler: bckamsler@gwu.edu
University Archives: archives@gwu.edu
Special Collections: speccoll@gwu.edu  - Special Collections Research Center, GWLAI