BENTLEY HISTORICAL LIBRARY
UNIVERSITY OF MICHIGAN

Records Policy and Procedures Manual

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The Bentley Historical Library and what we do

The University of Michigan Archives

Mission and authorization

The Bentley Historical Library serves as the University of Michigan's archives. It is the place where the university faculty, staff, students, and members of the general 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.

The Bentley's authority as the University's archives is defined in Section 601.08 and 601.08-1 of University's Standard Practice Guide.

601.08   University Archives and Records

For the purposes of this policy, "university records" are defined 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.

A. Executive officers and staff of central administrative offices, deans, other administrators, and staff of the respective colleges and schools, and departmental, center, institute, library, museum, and program administrators and staff create and maintain university records in the course of their duties. It is the responsibility of all such administrators and staff, in cooperation with the Bentley Historical Library's University Archives and Records Program, to ensure that these records are activities of the university community are transferred to the archives for retention.

B. The retention and disposition of records generated by university units shall comply with procedures outlined in the University Archives and Records Program Manual and in the Standard Practice Guide.

C. University records are public records and once fully processed are generally open to research use. Specific records that contain personally identifiable information may be closed to protect individual privacy. The closure of university records is subject to compliance with applicable laws.

This policy is not to be used in interpreting University's obligations under the Michigan Freedom of Information Act, the Family Educational Rights and Privacy Act, or any other laws. Questions concerning the application of these laws should be directed to the Office of the General Counsel.

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 of U-M 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.

Types of records in our care

The University's archives include office documents, still and moving images, sound recordings, databases, newspapers, maps, printed materials, architecture 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 70,000 linear feet of records storage. In addition, the Bentley manages the preservation and storage of digital records. The Bentley's website archive comprises 2.6 terabytes as of July 2014. 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 24 terabytes 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. 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 simply as "Records," e.g., The University of Michigan Department of Chemistry Records.

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 of its major subdivisions; and a detailed inventory list providing a hierarchical listing of the content.

A typical finding aid for a University unit is this guide to the School of Public Health's record group.[1] Links to the finding aids for university units can be found on the Bentley's website.[2] Additional materials related to University units (such as published works, media and related collections of records) can be located by searching the Bentley's MIRLYN catalog.[3]

Bentley 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.[4] It is also possible to navigate to the University's finding aids through the Bentley's Deep Blue interface.[5]

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 the Bentley's collections and use them.

We provide access to University records

Using records in Bentley collections

The Bentley's expert reference archivists are happy to assist university staff and members of the public use our collections in the reading room. The Bentley is open from 9 a.m. to 5 p.m. Monday through Friday, and Saturday mornings during the Fall and Winter terms. Free parking is available in an adjacent lot. 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 their own 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 the 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.

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1 http://quod.lib.umich.edu/cgi/f/findaid/findaid-idx?c=bhlead;idno=umich-bhl-87321

2 http://bentley.umich.edu/EAD/ead_uofm.htm

3 http://mirlyn-classic.lib.umich.edu/F?func=find-b-0&local_base=bent_pub

4 http://deepblue.lib.umich.edu/

5 http://deepblue.lib.umich.edu/handle/2027.42/65133

In addition, Bentley staff also provide remote reference for university units, particularly to help them access their own records remotely if they make an “administrative request.” Staff members can retrieve specific files, or answer research questions. University units may access this service by email by contacting bentley.ref@umich.edu. In some cases, the office that transferred the records may borrow back the records on loan.

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 in accordance with university policy as outlined below. The restriction of university records is subject to compliance with applicable laws, including the Freedom of Information Act (FOIA).

Categories of Restricted Records	
Personnel records	30 years from the date of creation
Student educational records	75 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 **The restriction is subject to applicable law, most notably 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.[6]

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. While we hope that eventually all of the Bentley’s records will be digitized, that is still in the future. On the other hand, 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.

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

We provide guidance on records management

Staff ate the Bentley are happy to consult with University units to provide guidance relating to university records policies and procedures. 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.

Administrative records that provide evidence of the university's organization, functions, policies, decisions, procedures, operations, transactions, or other activities must be created, managed, and preserved in a way that ensures they are locatable and usable for as long as is appropriate. Official records of the university should always be retrievable through university systems and not dependent on personally owned property for access or preservation.

The University's Standard Practice Guide provides the most important source of policy on how records should be managed, and how long they should be kept.[7] Unlike many businesses and organizations, the University does not maintain a comprehensive records retention schedule, though many sub-organizations (notably the Colleges of LSA and Engineering) have created their own guidance. Instead, several SPG provisions summarize employee's responsibility for managing records:

601.8	University Archives and Records
601.8-1	Identification, Maintenance & Preservation of Digital Records Created by U-M
601.11	Privacy and the Need to Monitor and Access Records
601.12	Institutional Data Resource Management Policy
601.14	Social Security Number Privacy Policy
602.05	Use and Release of Donor and Alumni Information
602.06	Alumni Directories
604.1	Department Record Retention for Business and Finance Records
201.22	Recruitment and Selection of all Regular Faculty and Staff
301.46	Personnel Records -- Collection, Retention and Release
601.28	Who Holds Copyright at or in Affiliate with the University of Michigan
500.01	Fiscal Responsibilities

[7] http://spg.umich.edu/

There are several other important sources of policy and official guidance on University records:

- Statement on Stewardship[8]
- Regents resolution creating the University archives, Nov. 1936
- Regents Bylaw 14.07 -- Privacy and Access to Information[9]
- Regents Bylaw 11.48 -- UMHHC: Discosure of Hospitals' and Health Centers' Records[10]
- UMHS Notice of Privacy Practices[11]
- Student Rights and Student Records[12]

[8] http://www.hr.umich.edu/stewardship.html

[9] http://www.regents.umich.edu/bylaws/bylaws14.html#7

[10] http://www.regents.umich.edu/bylaws/bylaws11c.html#48

[11] http://www.uofmhealth.org/protecting-your-privacy-hipaa

[12] http://ro.umich.edu/ferpa/

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 an 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.

There are a number of benefits associated with the implementation of sound records management practices and procedures for University records. Some of the benefits include:

Compliance	U-M as a public institution is subject to laws that require that certain records be kept.
Institutional memory	High-value information can be protected and is findable.
Efficiency	Necessary records can be found more easily if unneeded files are discarded.
Economy	Costs for physical and digital storage are minimized and effort to respond to legal discovery is reduced.

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).

Example record survey data

- Grant applications and progress reports, 1990-2005, paper, 4 file drawers in file room
- HR files, 1970-2014, PDF, shared drive
- Director's correspondence, 2010-2014, printed email, ½ drawer in departmental office

This inventory will help identify which materials are records, reference materials (non-records), personal papers and images (non-records) and extra copies (non-records). 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 retention schedule appropriate to a parent organization, such as the College of LSA or the College of Engineering. 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, CTools, 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 (eg. 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.

Record keeping systems and facilities and sensitive data

At the University of Michigan, units have many different options for storing information: CTools, SharePoint, Box.net, GoogleDocs, ImageNow, shared drives, file cabinets, etc. Sensitive data should be stored in a system with appropriate safeguards. Units should be aware of ITS's policies relating to Sensitive Data Classification.[13] To determine whether a particular kind of sensitive data may be maintained in a particular environment, units should consult the Sensitive Data Guide to IT Services.[14]

File arrangement and file naming standards for digital files

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 sub-directories 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.

- Top-level folders should be named for major functions/activities
- Subfolders should reflect secondary activities.
- Subsequent subfolders may be organized by academic or fiscal years to facilitate the disposal or transfer of records to the archives.
- Folder names should be self-explanatory and avoid personal names (instead employing role or job title where necessary)

[13] http://safecomputing.umich.edu/protect-um-data/examples.php

[14] http://safecomputing.umich.edu/dataguide/

Example file structure

- Admissions {Directories based on primary business functions}
- Aca_Advising
- Curriculum
    - Curr_Committee {Secondary directory based on associated business activities}
    - Course_Approval
    - Course_Catalog
        - 2011-2012 {Tertiary directory based on academic year}
        - 2012-2013

Some tips for effective file-naming

Do

- Use descriptive names to identify the content/purpose of files;
- Include the date of creation or revision using the International Standard Organization (ISO) standard 8601 YYYY-MM-DD or YYYYMMDD;
- Employee consistent conventions for version control such as FNL, rev1, DFT, etc;

Don't

- Avoid spaces in file names since these may cause problems if content is accessed via web browsers. Instead, use hyphens or underscores between words or capitalize the first letter of each word;
- Avoid using special characters that have special meanings in some operating systems such as !@#$%^&*()

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 (if possible) when creating digital records.

- File formats that can only be used with specific pieces of software or hardware may not be usable on different systems.
- 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 IT personnel or the Bentley Historical Library to discuss potential strategies.

Information on sustainable and preservation-quality file formats is available at http://deepblue.lib.umich.edu/handle/2027.42/96438

Websites and online records

The Bentley has developed a web archiving program to capture and preserve University websites. In 2010, the University began capturing websites. The vendor's service uses web crawlers to take a "snapshot" of the website at a particular point in time, thus creating an archived copy of the website. This snapshot is not a backup of the original website; rather, it is a record of the site at the time of capture. The Bentley currently captures nearly 900 University websites, with most sites being crawled on an annual basis. Versions of archived websites may be viewed online at https://www.archive-it.org/organizations/934.

Bentley staff use 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:

- Are created, owned, or used by university units, faculty, or students in carrying out university-related business, functions, or activities.
- Reflect basic functions or activities associated with the University's administration, teaching, research, service, student life, and athletic competitions.
- Complement existing record groups and manuscript collections.
- Fill gaps in collections.
- Contain unique and meaningful content that is periodically updated.

Archived pages are distinguished from live content with a prominent banner at the top of each page, which includes a statement that indicates users are viewing a preserved version and also provides a link to the source websites. Sites are also embargoed for use for a period of six months after capture. To preserve the most complete and accurate record of web content, the library makes an effort to reach out to webmasters when website design or configurations pose issues for capture. The following design elements and considerations will better ensure that a web page will maintain the same "look and feel" in the future as it was when originally presented:

- Make sure web pages are valid and HTML compliant.
- If there is a robots.txt file for the site, expressly permit the site to be archived by the Web Archiving Service by adding the following instructions to the beginning of the file:

  User-Agent: cdlwas_bot

  Disallow:
- Some types of content may present significant issues for preserving the complete form, functionality, and content of sites:

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

To ensure that archivists can preserve accurate versions of unit websites over time, please keep the Bentley informed about online activity at bhlwebarchive@umich.edu. Units can assist in the web archiving effort by:

- Notifying the library of websites that should be included in the University web archives;
- Providing the library with contact information for the web developer;
- Alerting archivists to major changes to the website, such as a new layout or design;
- Making recommendations to the library about the best time(s) to capture the website during the year based on when content generally changes;
- Requesting captures when content of particular value should be captured outside of regularly scheduled events.

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/or 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 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 the Web Archiving Service or alternate means, if it is technically possible to do so.

Maintenance and long-term preservation

Maintaining digital re cords 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.
- Backups should not be stored on the same machine or server.
- 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.

If applicable, review the service level agreement (SLA) 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/or directories, check with IT personnel 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 on-line or off-line.

A good example of an on-line system is an the shared network drives used by departments and work groups. The downside to managing records over time on-line 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 work group 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 on-line storage that has become popular in recent years. Services such as Google Drive, Box.com, 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 off-line, the best storage media include magnetic tape or external hard drives. Optical media, such as CD and DVD 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 2 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.

Recommended minimal storage conditions

Temperature between 60 - 65° F

Relative humidity 40%

Low light levels

Absence of magnetic fields

Hard drives and tape drives still need 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 and 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 important part of any storage strategy is ensuring that records are properly backed up. A simple way to remember how to back up data safely is to use the “3-2-1 rule”.

Keep 3 copies of any important file (a primary and two backups).

Keep files on 2 separate media (such as hard drive and tape), to protect against different types of hazards.

One copy should be stored offsite.

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 kinds of records

Financial records

The management of financial records, including supporting documents (such as purchase orders, personnel appointment forms, service unit billing statements, etc.) 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:

1. the contract documents;
2. the proposal;
3. substantive correspondence;
4. and the final report.

(Refer to the Standard Practice Guide 604.01 for information about financial records related to grants.)

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 Historical Library, the following procedures should be followed:

1. 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; and
   - grants copyright for the recordings/transcripts to the Board of Regents of the University of Michigan or retains copyright.

   The Bentley Historical Library will furnish the interviewer with release forms.[15]

2. Oral histories may be deposited on audio or video tape. The Bentley maintains current recommendations for digital audio and video formats.

3. The interviewer, interviewee, date, and place of interview should be identified both on the carrier/metadata and in the recording itself.

4. An index of topics covered and/or a complete transcription of the interview should be included.

5. Interviewers should test the recording at the beginning of the interview session to assure the audio and/or 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 (including the

[15] http://bentley.umich.edu/uarphome/forms/oralagr.pdf

Privacy Act of 1974), by state laws (specific statutes have been written for specific types of records, i.e. adoption records), the Health Insurance Portability and Accountability Act (HIPAA), by Regents Bylaw 11.48 -- UMHHC: Disclosure of Hospitals' and Health Centers' Records and the UMHS Notice of Privacy Practices.[16]

It is the responsibility of the generating unit to create, maintain, provide or limit access to, and dispose of patient/client records in accordance with 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.

Human resources records

Records kept by the U-M Human Resources Office, the UMHS Human Resources Office 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 and the Standard Practice Guide section 201.46. 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, award nominations etc. may add to the historical documentation of the unit and should be reviewed by the archives before destruction.

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[17], 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/or hold documents which are considered to be the student educational record under the definition of FERPA.

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[16] http://www.regents.umich.edu/bylaws/bylaws11c.html#48, http://www.uofmhealth.org/protecting-your-privacy-hipaa

[17] http://www.lsa.umich.edu/students/academicsrequirements/academicpolicies/studentrecordspolicy

FERPA gives individual students and former students the right to inspect, review, and challenge the content of their own educational records, and prohibits the release of "personally identifiable records" without consent, except under limited circumstances. When information is released to a third party, the third party may not further disseminate the information without consent.

Although FERPA was passed in 1974, it has been interpreted to apply to all student records ever created at an institution and it has been interpreted to apply to student records until the death, or supposed death, of the individual.

It is the responsibility of the generating units to maintain and grant or limit access to student records in accordance with university regulations and applicable law for as long as the records have administrative use.

Because of limited space and the restrictions on access to student records for research purposes, the university archives does not routinely accept student records for archival retention. The Bentley will consult with units about the appropriate disposition of their student records.

The Bentley may accept student papers or other creative work if they are judged to have long-term historical value. Research access to these papers will be possible if units obtain written releases. The Bentley has developed a transfer agreement and release form for student papers. Copies may be obtained from the Bentley's website. Access to these materials for administrative or research purposes will only be granted in accordance with university regulations and applicable law.

E-mail

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

The most important step staff members can take in the management of their e-mail 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. In the event that the University needs to retrieve records from an e-mail 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 it to use two different e-mail accounts. Alternately, e-mail filter can be used to automatically tag messages to or from family members as personal. Contact 4-HELP for guidance in using filters.

Just as with traditional paper records, a good place to start in the management of e-mail is to develop guidelines on how e-mail records will be classified, retained, and stored. Significant e-mail messages should be filed in a way that will ensure that the communications are easily retrieved. Some University offices create PDF copies of e-mail messages and interfile them with digitally maintained subject files in a shared record-keeping 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 e-mail 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. E-mail records of executives are considered sensitive information, and while subject to FOIA requests, are restricted at the Bentley for twenty years from the date of accession, and are available only to the creator or to his or her successor in office according to the Bentley's access policy.

Techniques to preserve e-mail 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.

What kinds of University records should be transferred 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.

Responsibility of the office generating the records

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

1. The records liaison should maintain regular contact with the Bentley and should implement the periodic transfer of records to the archives. See the section, How to Transfer Records to the Archives for instructions for transferring paper-based and digital materials to the Bentley.

2. Specific types of records that should be transferred to the university archives include:

    a. the central topical file
    b. the 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. the records of search and executive review committees which were initiated by the unit (see Executive Search and Review Committees)

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, travel logistics, etc.;
    c. non-university printed material retained as a reference file;
    d. 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.

    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 <u>financial records</u>, <u>grant documentation</u>, and <u>personnel records</u>.

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

5. 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.

Responsibility of the office generating the records

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

1. The records liaison should maintain regular contact with the Bentley and should implement the periodic transfer of records to the archives. See the section, How to Transfer Records to the Archives for instructions for transferring paper-based and digital materials to the Bentley.

2. Specific record groups that should be transferred to the university archives include:

    a. the dean's topical file;
    b. the dean'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.

3. 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.

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. correspondence and administrative files documenting routine activities such as room scheduling, travel logistics, etc.;
    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.

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

6. 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 colleges and schools 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.

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.

Responsibility of the office generating the records

Chairs and directors should designate a staff member to act as records liaison for the unit.

1. The records liaison should maintain regular contact with Bentley and should implement the periodic transfer of records to the archives. See the section, How to Transfer Records to the Archives for instructions for transferring paper-based and digital materials to the Bentley.

2. Specific record groups that should be transferred to the university archives include:

    a. the 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, travel logistics, etc.;
    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 should consult with a Bentley archivist if there are questions about the historical value of specific 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 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.

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. (See below for further information about these genres of 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.[18] 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.

Responsibility of the committee generating the records

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 the 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.

[18] When hiring non-executive employees, hiring managers or committees should create a "job file" for records related to the work of filling a position. 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 (to the extent they are created), should be retained in the local office four years from the start date of the successful candidate and then securely destroyed

4. The following records should be transferred to the archives:

    a. mission statement or charge to the committee;
    b. agendas;
    c. minutes;
    d. committee roster;
    e. substantive correspondence;
    f. position descriptions and job postings;
    g. interview questions and selection criteria;
    h. evaluative statements which document the selection process;
    i. short list of candidates as recommended to the hiring authority including candidates' credentials;
    j. reports by the committee, including the final report;
    k. news releases and public statements;
    l. final budget information

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 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.

Responsibility of the committee generating the records

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 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 maintained properly and that they are transferred to the archives for permanent retention.

Responsibility of the committee generating the records

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/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.

What about 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 e-mail
- 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

University of Michigan faculty members interested in transferring their papers to the Bentley should contact an archivist at UMrecords@umich.edu.

How to transfer records to the archives

Digital files

The Bentley accepts university records of long-term value in digital formats, whether they have been continuously maintained in digital format since creation, or whether they have been digitized from analog formats. Tools and procedures for transferring digital files are subject to change as new systems are developed at the Bentley and at the University more generally. Best practice is to contact a Bentley archivist to arrange for a transfer that is best suited to the amount and type of material that will be transferred.

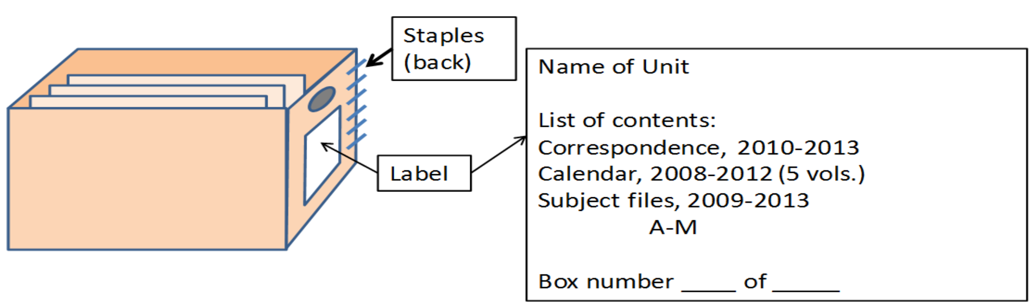
Paper records

1. *Contact the archives and obtain archival-quality Paige boxes.*
   Archival boxes are provided at no-cost to units, departments, or colleges. When placing the order, please be prepared to provide the archival staff with an estimate of boxes needed, the preferred delivery/pick-up location, and a designated contact and a phone number to best reach the contact.

   To build the collapsed Paige boxes, turn the boxes upside down and push downwards. Fold the edges at the scoring and insert the tabs into the slots.

2. *Pack and label the boxes.*
   When packing boxes, please do not over-pack the boxes. Keeping the boxes at a manageable weight will aid in the long-term preservation of both the materials and the boxes they are stored in. Place the files in the boxes horizontally, as though they were of legal size.

   Please avoid marking the boxes. Instead, affix labels to the box as shown in the illustration below. The label should list the name of the unit, the contents of the box, and the box number. Number labels the boxes are filled.



3. *Provide the Bentley with a box manifest in hard copy and via e-mail.*
   The box manifest will provide archivists information vital to the description and discovery of the records and serves as a receipt of transfer between university units, departments and colleges and the Bentley Historical Library.

4. *Contact the Records Management Program at the UMrecords@umich.edu to arrange delivery of your records to the Bentley Historical Library.*