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Office of Records Project Report and Recommendations

October 10, 2003

Willeen McQuitta, Director  
Staff Human Resources

Dear Willeen,

Following is the report on the work and recommendations of the Office of Records Work Group.

**Statement of Problem:** One result of the Service Center Roles and Responsibilities Project (SCRR) was a mandate to improve and streamline the creation and maintenance of human resources-related records. The Records Management Program (RMP) and Records Management Disposition Schedule (RMDS) maintained by UCOP was not current or specific enough for campuses to use in maintaining staff employee-related files given the decentralized nature of human resources functions at UCSC.

**Current Office of Record Status:** At this time, some offices have clearly-defined responsibilities for certain staff-related records while other record-keeping assignments appear vague or inconsistent. Although the University's Records Management Program (RMP-2-V-A) calls for the assignment of an individual in each department to monitor and implement the Disposition Schedule on its behalf, this is not currently a standard practice among all departments at UCSC.

Generally, Staff Human Resources is the current Office of Record for employee documents involving classification, service credit, and performance. Payroll maintains the employee's records pertaining to employment eligibility and terms for payment, and service centers are the Office of Record for attendance and leave accrual records, employee medical information, leave requests, Family Medical Leave documentation, layoff notices and other routine information. [Attachment A]

**Project Design:** In June 2002, the Office of Records Workgroup was formed to address this problem by identifying an "Office of Record", a retention schedule, and a set of procedures for all staff employment-related documents. The Work Group members are:

Service Center Representatives:

- Melanie Christensen, Humanities
- Susan Ford, Colleges and University Housing Services
- Nancy Halloran, Physical Plant
- Kathleen Hughes, OPERS
- Annie Kearney, Library
- Michelle Santos, Financial/Safety Services

Central Office Representatives

- Linda Beaston, Audit
- Paul Chandley, SHR Labor Relations
- Karin Dunwoody, SHR Compensation
- Don Mac Angus, Payroll

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Judith Martin-Hoyt, SHR Compensation  
Chuck Piotrowski, Chancellor's Office, Administrative Records  
Dee Dee Riccabona, SHR Employment  
Kelly Roberts, SHR Rehabilitation  
Elaine Wedegaertner, SHR Benefits

The workgroup decided to conduct an inventory of documents currently maintained by all service centers and central offices created through the following activities:

- Recruitment and selection
- Employee compensation, classification, administration and separation
- Benefits administration
- Lawsuits, grievances and complaints
- Work-incurred injuries, illnesses and rehabilitation

The inventory identified document circulation and duplication patterns, current maintenance and retention practices, including physical location, longevity and access. Follow-up surveys and interviews were conducted with representatives of central office functions that identified some additional documents and clarified the workflows that create them. Additional research was conducted to clarify other legal and regulatory requirements for record-keeping and to identify bargaining agreement-specific records issues.

**Findings:** A large body of University policies and regulatory interpretations exists in the Records Management Program (BFB-RMP-1 through 12). Several bargaining units also have provisions in their contracts that govern access to and the contents of personnel files. For reference, a summary of the most relevant RMP policies and bargaining agreement provisions is provided in Attachment B.

The service center and central office surveys identified approximately 130 different forms that are used to conduct HR business on behalf of staff employees. The results were compiled and analysis found that most of these offices were keeping copies of documents rather than originals; which are often given to the employee or another agency upon completion of a transaction. The copies are kept in various offices on campus and represent the "record" maintained on behalf of the University. Repeated copying of documents occurs for business purposes as well as for convenience, given on- and off-campus locations of these offices.

Some documents have multiple uses and are copied in order to provide supporting information for several different tasks, so some duplication of these documents seems justified in this instance. In addition, policies concerning the location and retention of documents are unclear, so more documents are created than are really needed, incurring unnecessary additional costs for duplication and storage.

However, truly redundant information occurs for three reasons:

- Documents used to collect information for entry into electronic databases are stamped and initialed by the preparer in order to provide verification of the actions' dates and accuracy.

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- Some HR documents get duplicated (in multiple formats) at each step of a process before being passed along “just in case” something happens to the document up the line (for example, where multiple signatures are required).
- Established business procedures necessitate the creation of information in both electronic and paper formats, causing retention of redundant information (inter- and intra-office emails that are printed by multiple recipients).

These redundancies revealed the following attitudes and concerns about information we keep:

- There is a high level of concern that information may not be available if kept only in one place; therefore, the tendency in most areas is to create redundant copies.
- There is even less trust that electronic sources of data will be complete enough to satisfy the need for information and that the potential for error requires keeping a non-electronic verification.
- Central offices and service centers need to feel confident that documents are kept in such a way that *all* obligations are met.
- When required, information sources must be readily identifiable and available quickly.
- Electronic processes are useful for accelerating the workflow even though they tend to create more copies (electronic and/or paper).

Real liabilities were also identified from the research and can be grouped into these areas:

- Compliance:
  - Not maintaining documents that we are legally obligated to have. Not knowing where they can be found if we do have them is the same thing or worse than not having them at all.
  - By not ensuring that extra-sensitive materials are kept separately from documents that are more general in accordance with legal requirements.
- Retention: Keeping things longer than their useful or legal lifespan. This includes the lack of consistent transfers of documents in the main employee file from unit to unit when the employee changes departments.
- Records Management: Increasing the burden of information management by duplicating information in multiple formats (paper and electronic). In addition, retention schedules are not uniformly applied to both electronic and paper records.

Sensitive information (e.g. background investigation results, medical information, and drug tests or DMV pulls) is not always treated sensitively. There is a risk that this information is being combined with the main personnel file and is not being treated as confidentially as is required by UCOP policy and the law.

Our research confirmed that the lack of a highly accessible and consistent policy for all offices that maintain employee information is the most significant contributor to documentation problems. Most offices are aware of the UCOP guidelines and use them to some extent; however, the ubiquity of multiple-use documents makes practical application of UCOP’s RMP principles (retention for “record copies” versus “other copies” and vague retention periods such as “0-5 years”) too difficult to apply consistently. As a result, the retention period as practiced

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often becomes “indefinitely”, which potentially adds to the cost of maintenance and space requirements for document storage.

**Recommendations:** When research results were applied to the initial problems, opportunities to improve the current system were identified as follows:

### A. Concepts and definitions

We propose that adoption of some key concepts.

1. Designation of the location for a “record” should be according to its use and context. Research revealed (with few exceptions) that a “record” does not need to be an original document as long as it is an accurate representation of the information contained in it (dates, signatures, etc...). This provides the opportunity to reduce the need to ensure that the “original” is the “record”, an effort that until now has created much inefficiency in a physically extensive system.
2. Assignment of the Office of Record should be to that unit most responsible for direct application of whatever actions or procedures mandated the document (but not necessarily its creator), within the boundaries of larger obligations dictated by UCOP and State and Federal laws and regulations. The purpose of designating an “Office of Record” is to ensure that records required to maintain the rights and privileges of both the University and the employee are available as long as they are needed. In a decentralized human resources environment, the intended function of the record needs to drive the choice of repository.
3. By ensuring that documents with similar uses, restrictions and retention requirements are kept together as a “file of record”, the burden of periodic purging becomes a less analytical task and can become more routine, as it was always intended to be. Separate filing for certain records, such as grievance and medical information, is already mandated, but the UCOP disposition schedule provides a document-by-document retention period with no practical suggestions for maintenance in files. The investment in staffing required to purge individual documents from files according to that schedule is too cumbersome, so retention periods have been assigned to document groups within categories.
4. Retention and disposition procedures cover all information (paper or electronic) and must be applied consistently. When an electronic system option is available, it can and should be used, but those records must be managed and purged just as if they were in a paper format.

### B. Document Category criteria

A system of document retention is proposed based on functional category. Criteria for developing these categories include lifecycle, the subject and workflow for the documents, frequency and location of use (e.g. service center or central office only or shared between the two), existing policies or laws, and the level of restriction that the nature of the information required (e.g. confidential or personal). These categories are:

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1. **Recruitment and Hiring documents:** documents supporting job postings, recruitment, the interview process, job offers and preferential rehires.
2. **Main Personnel file:** records of employee activities from the initial date of hire through separation.
3. **Payroll Business Records:** those records exchanged between the service center or employee and the payroll department that specify payments to be made, transfers of expense, or establish employment eligibility. Others maintained by Payroll exclusively that were not covered in the scope of this project.
4. **Service Center Business Records:** attendance and time records kept and the AB2410 form authorizing final payments to separating employees.
5. **Reports:** compilations of employee data generated periodically and which are used to identify data inconsistencies, provide summaries of employee population data, or to maintain policy compliance.
6. **Restricted, Regulatory or Legal records:** documents regarding employees' conditions, activities or relationship with the University that are confidential, such as medical information, grievances and lawsuits.
7. **Security or Background Investigation records:** documents that contain information used to investigate the initial or on-going fitness of an individual for employment at the University or, in the case of the UCSC application, an individual's express permission for the University to carry out that investigation.
8. **Supplemental Employee Records:** "unofficial" records used as tools, including supervisor's or analyst's notes, *duplicates* of performance evaluations or job descriptions, retirement income projections.

C. Proposed Disposition Schedule:

The proposed UCSC Retention and Disposition Schedule summary [Attachment C] outlines locations for documents so that, should the need arise, information can be requested from the most appropriate source. The retention period for each group represents the amount of time that the group's contents should be maintained in order to meet legal and regulatory obligations as well as supporting HR functions. Increasing reliance on more efficient data systems that we already have in place (such as electronic databases) is encouraged.

The categories and associated document groups assigned to an Office of Record and a specific retention period reflect both "best" practice and regulatory obligation. These have been compiled into the "Information Asset Retention Worksheets" that comprise the proposed UCSC Retention and Disposition Schedule. [Attachment D].

Retention periods reflecting the amount of time a document must be kept have been established for a record or "file of record"; duplicates (unless assigned to another record group) should be kept only as long as needed. The following retention periods are recommended:

- For main personnel records and some eligibility forms: 5 years after separation, except in the case of medical separation, disability, retirement, or disciplinary discharge, in which case, retain until subject reaches age 70.

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- For most payroll forms, the retention period is 5 years after the date of the last transaction, subject to contract and grant requirements.
- For documents concerning accidents, incidents or unemployment claims, records are kept for 5 years after the date of case closure.
- Recruiting/hiring documents and leave documents are kept for 3 years after date of the last transaction recorded on the document.

Duplicates (unless assigned to a file of record) should be kept only as long as needed or until the action has been taken—the longest retention period recommended for items in working files is 1 year after the separation of the individual that they concern. Working notes and correspondence should be purged as soon as no longer needed.

D. Policy Recommendations:

1. The Office of Record assignment should be given to the office most responsible for managing the purpose of the file.
  - a. The Office of Record for an employee's main Personnel File should be that employee's *current* service center and not Staff Human Resources.
  - b. The Office of Record responsibilities currently assigned to Payroll, Benefits, Labor Relations, and Vocational Rehab offices will not change; details of these assignments are contained in the proposed records disposition schedule [see Attachment C and D for details].
2. The Unit or Department Head should be designated as the officer legally responsible for ensuring that the unit complies with the University's procedures and retention schedules. In this capacity, they may re-delegate responsibility for day-to-day compliance to a staff member designated as "Records Custodian".
3. When an employee transfers to a new service center, the main personnel file must also be transferred. However, time and attendance records and confidential records such as medical documents, drug tests, DMV pulls or background investigations are NOT to be transferred with the employee's records; they must be kept by the accruing service center or office for the prescribed retention period.

The exception to this rule is when a transfer of an employee takes place due to reorganization and a transfer of a unit to a new service center. In this case, all records should be transferred to the new service center.

4. An employee's main files should be kept after their separation for the time as specified by the retention schedule (5 years after separation in most cases). After this time, the files should be destroyed in a manner consistent with guidelines established by the Campus Records Officer.
5. If a separated employee is rehired before the end of the retention period for their inactive personnel file, then that file should be returned to active status in their new service center. By request of the new service center, the service center holding the separated employee's file will transfer the main employee file as they would in the case of a normal employee transfer.

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6. Most documents may be copied for special project purposes but no duplicate can be kept longer than the retention period of the record. If the University responds to a request (such as a subpoena) for a document that (according to our posted retention schedule) we no longer maintain, then we must be able to certify with confidence that we truly no longer have that record available.
7. Multiple-use documents (such as the EAR and Job Description) have the same retention period as the file that they are associated with.
8. Any office receiving medical information not already covered by the proposed retention schedule must keep it separately from the main personnel file, restrict access to it, and not duplicate it or transfer it to another office unless specifically directed to do so by SHR, Risk Management, or the Campus Records Officer.
9. Unit heads in all human resources-related offices (whether an office of record or not) should:
  - a. Seek out electronic sources of data available to them (such as PPS and DataWarehouse) and use them instead of seeking out or holding onto paper records of the same information.
  - b. Determine a regular cycle for document purging (i.e. monthly or quarterly) no less frequent than once a year.
  - c. Delegate an appropriate member of their staff to be the “records custodian” who will ensure that documents are eliminated during the purge cycle, will periodically monitor the condition of any documents kept in off-site storage, and who will answer requests for information or transfers of information that the unit holds.

Procedures that provide detailed definitions and responsibilities for these policies are proposed in Attachment E.

**Benefits of implementing recommendations:**

1. The establishment of clear procedures and responsibilities should reduce needless duplication of documents thus saving time and money.
2. All information will have a known location and duration, so our legal obligations are met.
3. By maintaining the Office of Record assignments, records can be accessed when needed.
4. Creates a reliable record-keeping system.
5. Reduction in exposure to risk of non-compliance with collective bargaining agreements.

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**Next Steps:**

<b>Proposed Activity</b>	<b>Proposed deadline</b>
Introduce UCSC Retention and Disposition Schedule and procedures to service centers and central offices.	Nov. 2003
Make schedules and guidelines available online, to be maintained by Campus Records Officer.	Nov. 2003
Service centers and SHR Offices identify designated Records Custodian to Campus Records Officer.	Dec. 2003
Develop and conduct training for Record Custodians.	Jan. 2003
Transitional period - during this time, records should be transferred to the correct Office of Record or purged if they have expired. After this period, records with expired retention periods are not kept.	Jan.-July 2004

If you have questions, please contact me.

Sincerely,

Judith Martin-Hoyt  
Compensation Manager

Cc: Vice Chancellor Vani  
Assistant Vice Chancellor Valentino  
Office of Records Work Group