

Policy and Guidelines for the Development of General Records Schedules

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I. Public Records Management in Wisconsin Government

The purpose of this policy framework is to ensure that General Records Schedules are developed using consistent procedures within guidelines established by the Public Records Board (PRB).

Records management is a fundamental responsibility of every government body. Appropriately, identifying, maintaining, retaining and disposing of records according to approved retention policies is part of that responsibility.

General Records Schedules (GRS) are a mechanism for systematic retention and disposition of similar types of records across State government. GRS's eliminate the need for many agencies to develop and seek approval of their own retention schedules for the same records. They streamline the records development process by reducing the total number of individual Records Retention/Disposition Authorization (RDA) policies needing to be managed in the state. They lend consistency to record keeping across state government and provide assurance of accountability to the public. In addition, GRS develop uniformity and ease of access to information over time.

GRS are most often functionally based. Like other Wisconsin schedules, they apply to all records produced by a given function or process, regardless of format or storage media.

General Records Schedules are approved by the Public Records Board. They are maintained by the Department of Administration and are available as a resource for all State government entities to use. Developed under appropriate guidelines, using accepted records and information management practices, General Records Schedules are a valuable resource for improving efficiency in managing public records.

II General Records Schedules (GRS) Policy and Guiding Principles

General records schedules (GRS) are developed under the authority of the Public Records Board (PRB), the statutory body responsible for overseeing the preservation of the State of Wisconsin's public records and prescribing records management policies and standards. The Public Records Board reviews and assesses general retention schedules for their legal, fiscal, administrative or historical value and seeks to integrate agency input and feedback into GRS development efforts. Following is the PRB policy and guiding principles on General Records Schedules in Wisconsin.

A. GRS Policy:

It is policy of the Public Records Board that General Records Schedules (GRS) are a fundamental component of the State of Wisconsin's Records Management Program. Records schedules set retention and disposition guidelines for public records, regardless of the records' storage media or format.

It is the policy of the Public Records Board to authorize the development of GRS and encourage their implementation. New GRS and existing ones should be kept up to date and reflect current record keeping and compliance requirements.

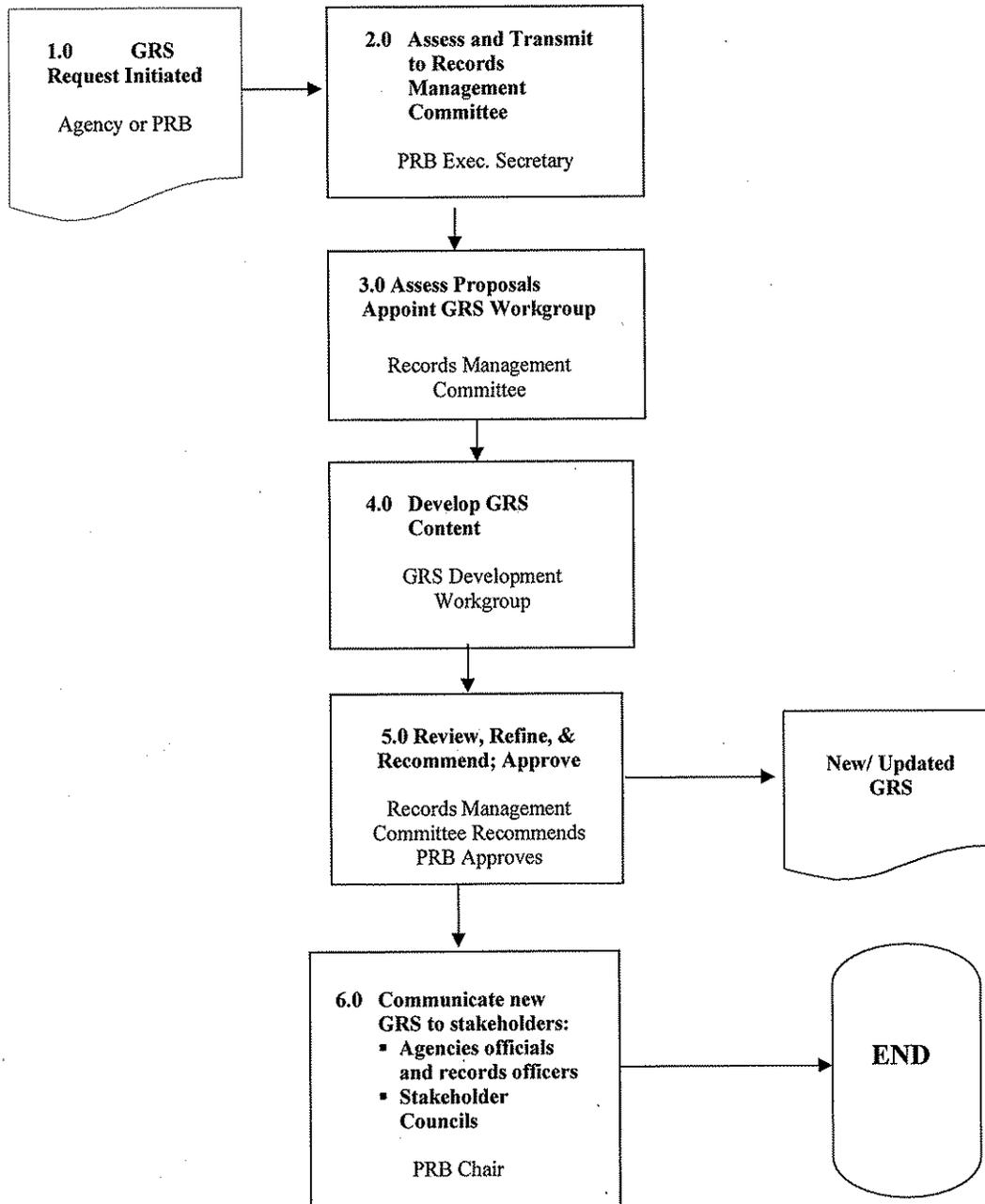
The PRB will notify state agencies when a GRS is under development. Consistent with PRB current policy, while the GRS is under development, no unscheduled records related to the GRS under development, can be destroyed without prior board approval.

B. GRS Guiding Principles

General Records Schedules should:

- Be based upon accepted appraisal standards addressing the legal, fiscal, administrative or historical value of the records.
- Strive to meet records and information management best practices.
- Seek to address all records relating to a specified function, process, or information system.
- Address the business needs of State government and provide current support to a business function.
- Recognize the decentralized nature of Records & Information Management (RIM) in Wisconsin State government and permit State agencies to adapt in their own environments.
- Be recognized, approved and endorsed by the PRB as retention policies for the identified records
- Be developed and maintained as living documents that can be reviewed and modified as necessary.
- Be reviewed periodically by the PRB RM committee to ensure they are still current and meet enterprise RM needs.
- Reflect Wisconsin Public Records Law and meet the qualitative standards of Administrative Rule 12.

Chart III A: GRS Development Framework Top Level



III. GRS Development and Review Process

- 1.0 **New Proposal Submission:** A GRS project proposal is submitted to the executive secretary of the PRB. A proposal to develop a new GRS can be prepared and submitted by any State agency or governmental body. The proposal should identify the function or process that produces or supports the records and a brief narrative as to the need for a GRS.
- 2.0 **Proposal Transmission:** Proposal is transmitted to Records Management Committee with an initial assessment prepared by the PRB Exec. Sec.
- 3.0 **Proposal Assessed: Review, assessment, approval to move forward:** PRB Records Management Committee reviews, assesses and endorses the development of the proposed GRS on behalf of the PRB. The subcommittee names members of the initial GRS workgroup.
- 4.0 **GRS Content Development: (for detail see Chart B)**

Initial GRS workgroup reviews the proposed schedule subject area and assesses whether additional membership is needed or desirable. Workgroup designates a recorder for the project and prepares scope statement and timeline for the GRS project.

 - 4.1 GRS Workgroup develops and communicates scope statement, proposed timeline and recommendation for expanded workgroup membership to the PRB Records Management Committee.
 - 4.2 Records Management Committee approves scope and timeline and may solicit additional members to GRS workgroup as needed. Further membership is recruited. PRB Staff provides scope statement and notice to the related stakeholder management council(s), extending an invitation for more subject matter expert participation in GRS effort.
 - 4.3 GRS Workgroup develops content. Methodologies can include records inventories, agency surveys, review of existing retention schedules, researching other states' retention schedules.
 - Draft GRS is circulated through workgroup members to their own agencies for feedback (general estimated time required ~2 weeks) .
 - Draft is updated and revised draft is circulated to all agencies by named records officer contacts for feedback (general estimated time required ~2 weeks). Draft is revised from additional feedback as necessary.
 - 4.4 Final review and revision. Revised draft, reviewed by agencies, is circulated to impacted stakeholder councils for feedback (general estimated time required ~4 weeks). Feedback received is integrated by GRS workgroup, resulting in new proposed GRS
- 5.0 **GRS Approval (for detail see Chart C)**
 - 5.1 Records Management Committee receives reviews, refines final draft and recommends approval of proposed GRS to PRB.
 - 5.2 Public Records Board reviews, revises and approves recommended GRS.
 - 5.3 PRB Chair develops transmittal letter to agency management on approved GRS.
- 6.0 **Communication to Stakeholders (for detail see Chart D)**
 - 6.1 GRS sent with transmittal letter and opt-in opt-out notice¹ to Deputy Secretaries. PRB Chair communicates to Deputy Secretaries; PRB Executive Secretary communicates to agency records officers; PRB Policy Staff communicates to the impacted stakeholder management council(s).
 - 6.2 Agencies Opt-in or Opt-out using PRB Opt-in process.

¹ Opt In-Opt Out Policy which permits each State agency to make determinations about how they will respond to a newly approved GRS; adoption in whole or in part or opting out entirely, was approved in March of 2006. This PRB policy was not made retroactive so only relates to GRS approved since that date. The current version of the PRB Opt-in Opt-Out policy is attached to and is made a part of this GRS policy.

Chart III B Detail on GRS Content Development (Expanded Step 4)

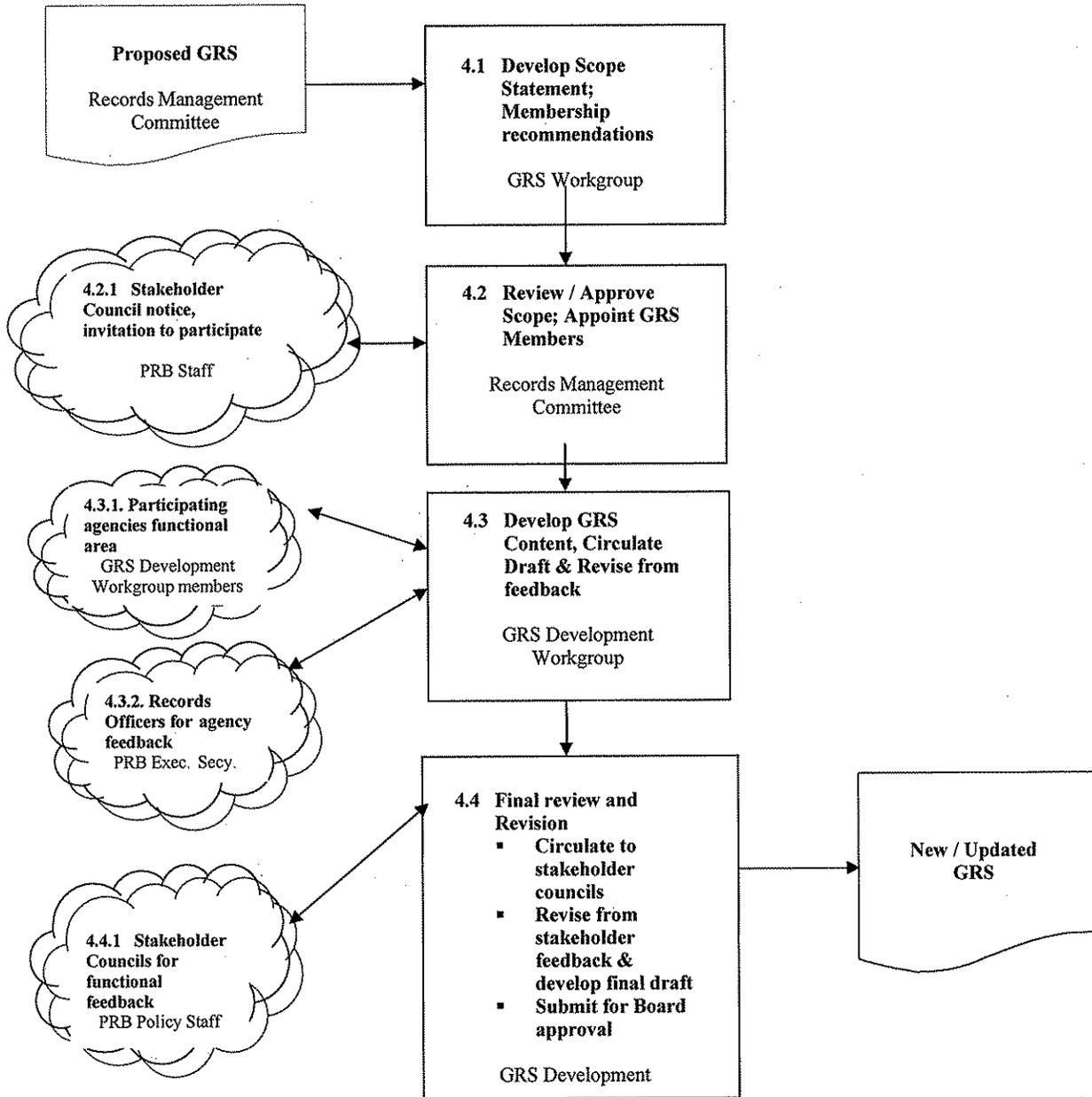
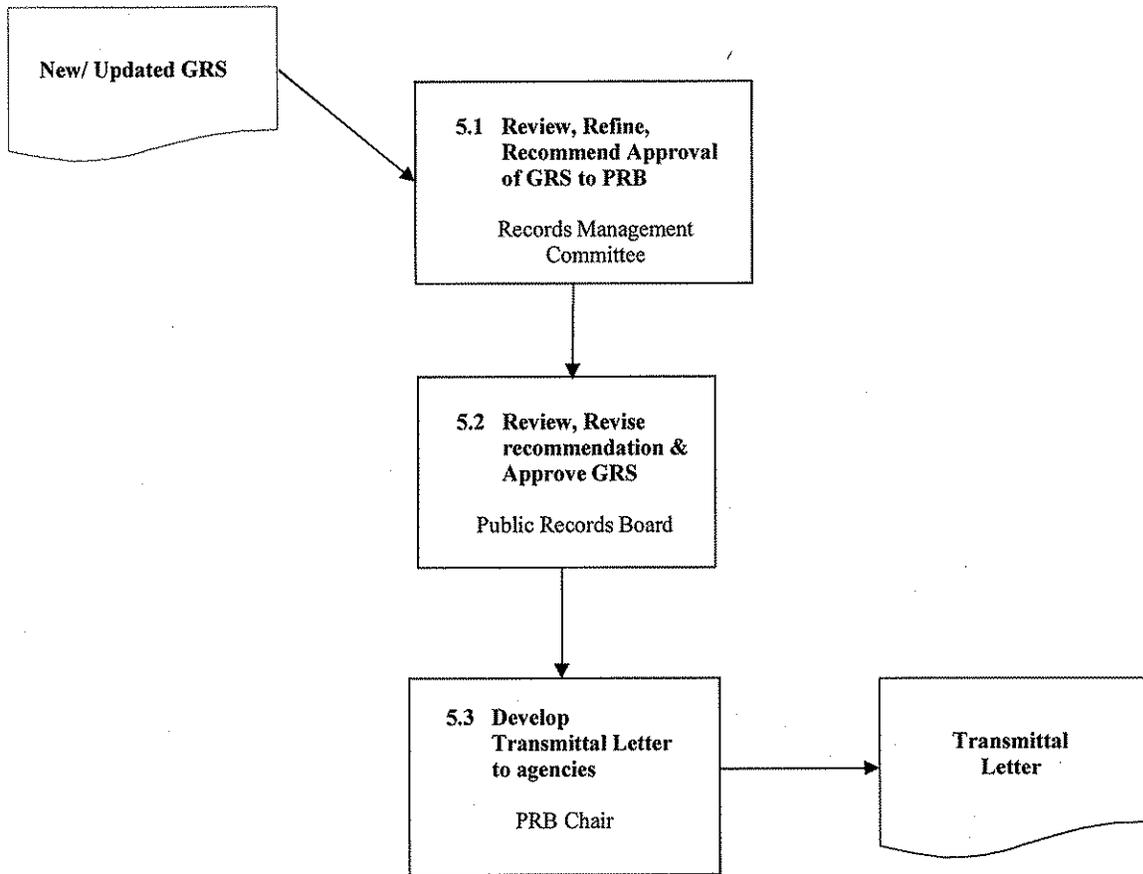
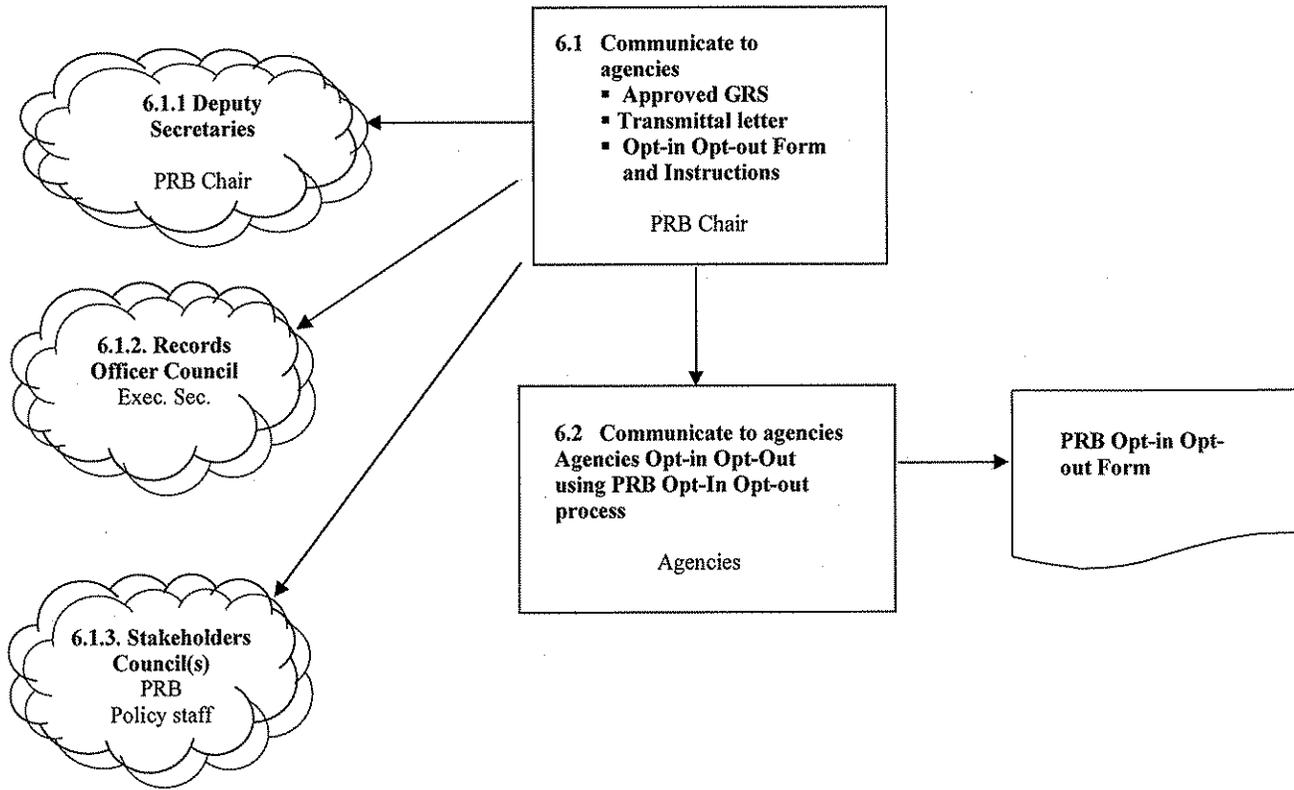


Chart III C Detail on GRS Final Approval (Expanded Step 5)



Charts III D Detail on Communication of New GRS (Expanded Step 6)



IV GRS Amendment Process:

Amendments to GRS may involve two types of changes to the policy:

- (1) non-substantive amendments, such as minor word changes not significantly impacting the retention or disposition of the records and
 - (2) substantive amendments or those that significantly impact records retention or disposition or add or delete records series. All amendments will be reviewed by the PRB before it issues a revised policy.
- GRS should be routinely reviewed by the PRB Records Management Committee to ensure they are still current and meet enterprise business needs. These reviews may result in development of a new GRS
 - Amendments may be proposed by an agency, the State Records Officer Council, or any other entity that uses the policy. Proposed changes to an existing GRS should be submitted to the Executive Secretary of the PRB
 - The PRB Executive Secretary will assess all proposed amendments and bring them to the Records Management Committee. All changes to GRS, regardless of significance, will be reviewed by the PRB Records Management Committee and approved by the PRB.
 - The Executive Secretary will propose action on non-substantive amendments to the GRS,
 - Proposed substantive changes will follow the same process for the development and review of new GRS (see step 4.0 to 6.0 in the GRS development process).
 - Notice of the all approved changes must be posted to the web and communicated to agency records officers

V Policy and GRS Implementation Next Steps

Following are further opportunities to be pursued in improving the General Records Schedule process that are outside the charter of this drafting team. These suggestions are recommended for consideration and follow-up by the PRB and its committees.

GRS Policy Implementation

- Develop a consistent format or template/model for the GRS that would facilitate electronic access
- Identify functional areas for potential GRS development
- Integrate communication needs with PRB communication plan
- Develop and implement GRS training

GRS Implementation Next Steps

- Create a FAQ on the schedule
- Provide agency tips on implementation
- Provide suggestions on proper management of records (i.e. access & use of records center, types of disposition, etc)
- Computer applications -- The management of the records addressed in the GRS should be integrated with any information system that supports the functional area.
- Make final schedule available via the web in searchable database

Appendix A

GRS Format

Narrative Elements: These elements normally occur in the introductory portion of the GRS and provide the State policy context for records management as well as address any particular issues inherent in the function, process or information system addressed by the GRS.

- Description of functional area that is focus of the schedule
- Examples of records covered in the records series
- Scope statement that addresses both what is included in the GRS as well as those items that considered outside the GRS and /or the limitations of the GRS.
- Sources used in GRS development, most particularly full legal citations when/where appropriate and known or statutory citation for the whole schedule
- Include a section on security that addresses access-confidentiality requirements
- PII (personally identifiable information) or other confidential information on the schedule
- Statement of approval by PRB-other authorities and date.
- Definitions/terms as appropriate.
- Suggestions on management of records—should not create records, access to records center, etc.
- If applicable, a narrative element should be included that briefly describes the particular information technology application that supports the functional area

GRS Identification:

Each item in the GRS will have a unique identifier, a records series title, a thorough description of records series content, access requirements, retention and disposition.

Appendix B

GRS Workgroup

GRS Workgroup Membership

- GRS Workgroup is advisory to the PRB Records Management Committee. It should be broadly representative of State agencies and the functional area involved but small enough to be workable as a team. The workgroup membership should include sufficient expertise and knowledge to ensure an understanding of the process/es involved, uses of the records and data produced by the functional area, and protect the public's interest in the records of State government.
- Workgroup membership should include a representative or at least one member of the following groups: agency records officer/s, representative from program unit with major responsibility for the function, information technology staff, and a State archives representative. Depending upon the subject matter of the GRS, it may be beneficial to include legal counsel and audit staff with expertise in the area.
- Individuals or State agencies proposing a GRS project may wish to include suggestions for committee membership as part of the proposal.
- Workgroups can establish their own timelines and meeting schedules.
- Workgroups should report quarterly to the PRB Records Management Subcommittee on the progress of the project.

GRS Development Work Methodology

The methodology used to develop the content of the GRS is up to the Committee. Methodologies can include records inventories, agency surveys, review of existing retention schedules, researching other states' retention schedules.

APPENDIX C Current Policy on Opt-in Opt-Out

Agency GRS Adoption Opt In/Opt Out Options

A copy of the Opt-in Opt-out process adopted by the Public Records Board in March of 2006, duplicated below, may be found on the Public Records Board website at:
<http://www.doa.state.wi.us/docview.asp?locid=2&docid=5674>.

Agency Agreement to Use General Schedule-New Policies and Procedures Adopted by the Public Records Board-March 1, 2006

Currently when the Public Records Board (PRB) approves a general records schedule the implementation by each state agency is assumed. This new policy, effective March 1, 2006 requires an affirmative act on the part of agencies to adopt for their internal use General Records Schedules (GRS) approved by the Board.

Policy Statement

General records retention schedules, GRS, are a mechanism for systematic retention and disposition of similar types of records across State government. GRS's eliminate the necessity for agencies to develop and seek approval of their own retention schedules. They lend consistency to record keeping across state government and provide assurance of accountability to the public. The PRB supported the development of and approved several GRS in several functional areas. This policy statement outlines a process that State agencies must use to adopt for their internal use any GRS approved by the PRB.

Any state agency (including UW System Administration and all UW campuses) may adopt any or all of the authorizations in any general schedules approved by the PRB and identified for use by state agencies provided the agency head or deputy and agency records officer notifies the Board in writing of the intent to use the schedule. Adopting a Board approved GRS means that the agency agrees to implement the retention and disposition recommendations noted for each records series in the particular GRS. State agencies must choose one of the following options with regard to the adoption of GRS's:

- 1- **Opt in:** Agreeing to opt in means the state agency agrees to use the recommendations noted in the GRS for its records.
- 2- **Opt in with revisions:** State agencies choosing this alternative would agree to the recommendations of the GRS, but they will submit to the PRB a list of records series with retention and disposition recommendations that vary from the GRS. It is recognized that State agencies may have in some areas the need to retain items for a different period of time than that recommended by the GRS.
- 3- **Opt out:** If a State agency opts out of adopting a GRS; it must then within six months in accordance with Wis. Stat. 16.61 provide specific retention schedules for any record it maintains in the functional area covered by the GRS.

State agencies should be aware that current law (Wis. Stat. 16.61) requires authorization of the Board to destroy any state agency records. Therefore, if a state agency chooses to opt out entirely or partially of any existing general schedule, they may not destroy any records until separate records disposition authorizations (RDA's) are prepared by the state agency and approved by the Board.

Implementing General Records Schedules

After adoption and notification, state agencies may use the identified general schedule for any applicable records in its custody. This means that following notification, records may be disposed on a continuing basis, provided that the minimum retention time period identified in the schedule has been met. If a general schedule identifies a record series with a disposition of transfer to an archival repository, those records must be offered to the archival repository rather than being destroyed. Disposal or transfer of records is contingent on record destruction restrictions contained in Wis. Stat. 19.35 (5) (Open Records Law). No records may be destroyed if litigation or audit involving these records has commenced.

PRB Policies - GRS Development Policy and Guidelines

State agencies may discontinue the use of all or portions of any general schedule, but the agency records officer must first notify the Board of the discontinuance. When an agency discontinues use of a general schedule (in whole or part), the records controlled by the applicable record series may no longer be destroyed or transferred until separate records disposal authorizations are prepared by the state agency and approved by the Board.

Discussion

The Board is implementing this new requirement to strengthen state agency compliance with records retention law and to increase efficiency in state records management. The requirement will be implemented on a "day forward" basis as the Board approves either new or updates to existing general schedules.

An approval form will be issued along with each approved general schedule. The form will identify the functional area (for example Fiscal and Accounting; Personnel; Information Technology) covered by the general schedule and have check boxes for the agency to affirm their intent to opt in to the entire general schedule, opt in with revisions or opt out all together. The form will have signature blocks for the Agency Head, Agency Records Officer, Board Executive Secretary and the State Archivist.

Agencies should not opt out of a GRS because your agency does not create or use all the types of records contained in a schedule. Agreeing to follow the record retention and disposition requirements within a GRS does not obligate an agency to create records. It only requires that records be retained in accordance with the retention time periods and dispositions if such records exist.

Since the general schedule contains the minimum time periods, the most likely reason that an agency will not use the time periods is because they have a business need to keep the records longer. The Public Records Board will not approve retention time periods in separately submitted record schedules shorter than those contained in the general schedule.

If a record series in a general schedule is identified as having potential historical value, that determination stays with that record series if an agency chooses not to adopt the general schedule. This means that if an agency proposes a separate schedule they should assume that the disposition for the series will be transfer to an archival repository, rather than destroy.

Agency compliance with records retention requirements is existing state law. Therefore agencies that choose to opt out of all or parts of a general schedule may not destroy any records that are controlled by these record series until the agency has prepared separate records disposal authorizations which are then approved by the Public Records Board.

APPENDIX D

Glossary

General records schedule: (also referred to as common records schedule, master records schedule, comprehensive records schedule) A list of records series commonly found in many divisions within an organization, indicating their respective retention periods and other instructions for the disposition of those records.

Record management: The systematic creation, use, maintenance, and disposition of records to meet administrative, programmatic, legal and financial needs and responsibilities.

Record management requirements: Statutory or regulatory requirements, or administrative directives, that define obligations for the creation and maintenance of records by an organization. Since each agency is legally obligated to create and maintain adequate and proper documentation of its organization, functions and activities, it needs to issue recordkeeping requirements for all activities at all levels and for all media and to distinguish records from non-record materials and personal papers.