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THE STUDY AND DEVELOPMENT OF A RECORDS MANAGEMENT PROGRAM FOR THE UNIVERSITY OF MICHIGAN

by

Linz Carroll Brown

A dissertation submitted in partial fulfillment
of the requirements for the degree of
Doctor of Philosophy
(Education)
in The University of Michigan
1973

Doctoral Committee:

Professor William K. Medlin, Chairman
Professor Frederick W. Bertolaet
Professor Herbert W. Hildebrandt
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INTRODUCTION

The Problem

Beginning with the years following World War II, institutions of higher learning experienced a tremendous growth in the creation and accumulation of records. Contributing to the paperwork phenomenon were such factors as rising enrollments; increased private, industrial and governmental research; technological advancements in electronic data processing and paper duplication processes; and increased specializations in both administration and instruction. Space scientist Wernher Von Braun conveyed the modern administrator's feeling toward this phenomenon when he commented, "'We can lick gravity, but sometimes the paperwork is overwhelming.'"[1]

One indication of the paperwork problem at The University of Michigan is evidenced by the number of records created during registration periods. The University registered approximately 38,000 students during the Fall Term of 1969-70. Five of the forms used in the process generated twenty-seven copies. These forms and their copies, multiplied by the number of students for two semesters (Fall and Winter), produced in excess of 2,000,000 new records. At this rate, the University could well create a quarter of a billion records in the school year, 1969-70.

What will happen to these records? The first possibility is that they will be filed for an undetermined period of time, and this costs money.

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[1] J. J. Hammitt, "Government Archives and Records Management," The American Archivist, XXVIII (April, 1965), 219.

The 2,000,000 records mentioned above are of approximately the same size and would probably be placed in 22-tray, card files. These same records would fill twenty-three cabinets at a cost of $7147.48.[2] In addition, definitive studies in business have found that it costs between $252 and $320 per year to maintain one file in an active office area.[3]

A second possibility is that some or all of the records will be destroyed. But, a vigorous clearing out of records at sporadic intervals is unwise because important papers might be overlooked and discarded. The process of determining which records should be retained and which may be destroyed cannot be conducted in an ad hoc manner. In today's complex operations, no one individual has sufficient overall knowledge to make decisions for all types of records whose values must be ascertained and weighed.

Recognizing the need for a more systematic approach to the handling of records at the University, President Robben W. Fleming established a Records Management Committee on December 15, 1969. One function of the Committee was "to recommend a practical course of action which will provide an efficient and systematic method of handling records taking into consideration their legal, fiscal, administrative and historical usefulness."[4] This action created the problem of finding the theoretical and methodological tools underlying records management.

A Response

This study is a direct, but independent, response to President

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[2]Based on 1970 cost figures supplied by The University of Michigan Purchasing Department.

[3]Remington Rand, Breaking Down Your Paper Barrier. (New York: Remington Rand Division of Sperry Rand Corporation, 1963), p. 8.

[4]Memorandum from President Robben W. Fleming to members of the Records Management Committee, dated December 15, 1969.

Fleming's charge and to the needs implied by it. It also constitutes an investigation into policy matters vital to higher continuing education institutions.

Part I

Part I is designed to provide a background or perspective from which to view the many characteristics of records.

Chapter I traces the historical aspects of records management as practiced by the Federal Government, and it summarizes the basic principles and concepts that evolved along the time line.

Chapter II utilizes a case study technique to create an awareness of the sensitive area of civil liberties. A major portion of the records created and maintained by the University contains information on or relating to individuals. The implications and potential dangers of handling such information are examined by reconstructing the events that surrounded the historical HUAC (House Un-American Activities Committee) decision of 1966.

Chapter III is an attempt to develop a conceptual framework to guide decision-making. Utilizing a systems or "wholeness" approach, the interrelationships of a university are first analyzed and then synthesized. Hopefully, the result is an improved means of viewing the value of records.

Part II

The primary purpose of Part II is to support the Committee in its task by developing a model of a records disposition program for The University of Michigan.

"Records management, in its broadest sense, is a systematic approach to the control of records from their creation, through their

various uses, up to final disposition."[5] Implicit in this statement are the three related activities of creation, maintenance and disposition. Of these three, the scheduling of records for disposition was the first to gain acceptance as a potent management tool. It was a practical approach to paperwork that dealt with the source of records problems. When the related areas of creation and maintenance were added to it, paperwork could be traced from its beginning to its end.[6]

Realizing that all elements of a records management program could not and should not be approached simultaneously, Part II of this study concentrates upon the most practical and basic of the three activities just mentioned, records disposition. This important element of a total records management program has been described as:

> The systematic transfer from office to storage of records that are not needed for everyday operations or frequent reference, and the destruction of records that no longer have any significant or useful value. Such a program not only determines the time at which a record shall be destroyed, but also establishes the minimum period of time during which a record must be retained to fulfill legal, historical, fiscal, and administrative requirements . . . .[7]

To test the ideas set forth in the model, an experimental records disposition program was started in the Office of Registrar on March 24, 1970. Through the process of action research, systems and procedures were developed, tested and revised. This is not to imply that all steps could be tested. Some aspects of the model could not be tested directly, e.g., the operations of a centralized records center.

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[5]Nancy A. Sanfelippo and Charles P. McLarnon, "Obtaining Maximum Benefits from Records Management," Records Management Quarterly, IV (July, 1970), 9.

[6]William Benedon, Records Management (Englewood Cliffs: Prentice-Hall, Inc., 1969), p. 3.

[7]Records Management Committee, Records Management Handbook: Records Disposition (Berkeley: University of California, 1963), p. 3.

PART I

RECORDS IN PERSPECTIVE

CHAPTER I

THE HISTORY AND DERIVATION OF PRINCIPLES OF RECORDS MANAGEMENT AS PRACTICED BY THE FEDERAL GOVERNMENT

> It would seem that a mature civilization should select carefully and systematically its most important records of experience for transmission to future generations. It is physically impossible to keep everything; nor is it desirable that the future should have to winnow more chaff for its kernels. Probably society will never devote more than limited space, money, and time to the preservation of records, and if this is so, it is axiomatic that such limited expenditures should be for the care of the more worthwhile. This means intelligent valuation and deliberate sifting. Yet, no contemporary society either keeps or discards scientifically. The quality of the future's legacy is left to chance.[8]

When Oliver W. Holmes wrote this discerning commentary on records in 1938, the field of records management had not begun its rise as an organized body of knowledge. The experience and know-how acquired in the decades that followed 1938 have helped to change significantly the conditions described by Holmes. A systematic approach to records disposition has evolved, but it has not yet achieved the level of objectivity required by scientific standards. Thus, the element of chance has been greatly reduced, but not removed.

Records management in the United States is the product of two evolutionary movements. One movement can be traced through the annals of governmental agencies, and the other is an outgrowth of big business.

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[8]Oliver W. Holmes, "The Evaluation and Preservation of Business Archives," The American Archivist, I, No. 4 (October, 1938), 171.

Because of the difficulty in collecting data from business and relating it to a proper time sequence, energies for this work have been devoted to the better documented, governmental lineage.

Records Management Activities in the Federal Government

The Early Years (1789-1879)

Provisions for the maintenance of records began early in the life of the federal government. The Acts of Congress of 1789, which created the executive departments of the federal government, provided for the keeping of records. Secretaries in most of the departments were authorized to appoint clerks, whose duty it was to maintain records.[9]

The need for more adequate legislation became evident in 1810. By this time, the garret in the public building west of the president's house was completely filled with public records. The provision of 1789, it seems, had permitted the uniform preservation of both valuable and valueless records. A House committee, appointed to inquire into the state of the ancient records and archives, reportedly found the papers to be in a "situation neither safe nor convenient, nor honorable to the nation."[10] The result was the passage of an act on April 28, 1810 which provided for the removal of all but three departments from the public building and the construction of fireproof rooms for the deposit of records of these departments.[11] Having accomplished this task, Congress ceased to be concerned

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[9]Henry P. Beers, "Historical Development of the Records Disposal Policy of the Federal Government Prior to 1934," The American Archivist, VII, No. 3 (July, 1944), 181.

[10]U. S. Congress, House, Report of the Committee, Appointed to Inquire into the State of the Ancient Public Records and Archives of the United States. March 27, 1810. Members of the committee were Josiah Quincy of Massachusetts, Archibald Van Horne of Maryland, and Jacob Swoope of Virginia.

[11]Beers, op. cit., 182.

about public records for the next seventy years.

The pressures of steadily climbing accumulations came to the surface again just after the Civil War. In July of 1870, the Secretary of War appointed a board "to examine into and report upon the existing methods of keeping the records and transacting the current business of the War Department and its Bureaus."[12] In its report, the board made the following comments concerning the accumulation of records:

> The yearly accumulation of papers in the various public offices has engaged the attention of the board. Most of these papers possess no value whatever after the lapse of differing periods of time, while others are never likely, within reasonable probability, to prove of sufficient value to justify the care and expense of their preservation . . . .[13]

Similar conditions were reported by other departments. Annual reports repeatedly called attention to the rising tide of paper. Most of the time the reports contained suggestions for alleviating the condition. In 1872, the Secretary of the Treasury straightforwardly declared that the increase of books and papers was so great that it interfered with the operations of his department. It seems that many of the rooms needed for clerks' desks were overflowing with records. Even portions of the public halls were crowded due to the same problem. The Secretary's answer to the problem was predictable: more space. He suggested that a brick, fire-proof building be erected just south of the Treasury for the housing of records and the accommodating of the Bureau of Engraving and Printing.[14]

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[12] U. S. Congress, Senate, Report [of] the Select Committee of the United States Senate . . . to Inquire into and Examine the Methods of Business and Work in the Executive Departments, etc., and the Causes of Delays in Transacting the Public Business, etc. Report 507, Fiftieth Congress, First Session, 1888, p. 240.

[13] Ibid., p. 241.

[14] Beers, loc. cit.

The Quartermaster General of the Army in 1875 urged Congress to pass a law authorizing the destruction of worthless papers. But, again, the prepondant opinion was for more space.[15]

Then, on September 24, 1877, the inevitable happened. A fire destroyed part of the Interior Department building. Three days later President Hayes appointed a commission to investigate and report upon the conditions of all the public buildings in Washington. This commission concluded that:

> Generally the public buildings not of fireproof construction, and used for office purposes, are much endangered by the character of their contents. The files cases and boxes, books, papers, &c., [sic] belonging to the several departments of the government, have accumulated to such an extent as to crowd the spaces provided for them; and a fire fairly under way would be difficult to control.[16]

One of the President's charges to the commission asked the question, "What provisions, if any, should be made for the custody and safety of files in constant use?" The commission's reply was:

> While in some of the departments there are files in constant use that date back to the earliest days of the government, there are in all the departments large numbers of papers no longer needed for constant reference that only add to the quantity of combustible material in the structures, and the consequent danger from fire. The number of papers is increasing rapidly, and in the consideration of the care and preservation of the files this commission has met with the suggestion that many of the papers could well be destroyed. After a careful examination of this question, we do not consider it advisable to recommend this course with any of the records, however unimportant they may appear. Every paper worthy at any time to be recorded and placed on the public files may be of value at some future time, ... We therefore recommend, for the relief of the overcrowded buildings, and in view of the rapid increase of the public records, that a fire-proof building of ample dimensions be constructed for the

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[15] U. S. War Department, Annual Report, 1875, p. 200.

[16] U. S. Congress, House, Report of the Commission appointed to Examine into the Security of the Public Buildings in the City of Washington against Fire. House Ex. Doc. No. 10, Forty-Fifth Congress, Second Session, December 10, 1877.

> accommodation of the archives of the government no longer required for constant use.[17]

A plan was subsequently drawn for the proposed "Hall of Records," but Congress never got around to appropriating money to build it.

Failing to make progress in one direction, the besieged departments sought relief in another. If more space could not be obtained, something had to be done to reduce the crowded conditions in existing space.

The first breakthrough came in the form of a provision in the appropriations act of March 3, 1881.[18] Three years earlier, the Postmaster-General had pointed out in his annual report the crippling effect of overcrowded areas. In the same report, he recommended that Congress give him the authority to destroy valueless records. Patience paid off. The appropriations act contained the following authorization:

> . . . the Postmaster-General is hereby authorized to sell as waste paper, or otherwise dispose of, the files of papers which have accumulated, or may hereafter accumulate in the Post-Office Department that are not needed in the transaction of current business and have no permanent value or historical interest; and the proceeds of said sales he shall pay into the Treasury, and make report thereof to Congress.[19]

Although limited in scope, this was the first legislation authorizing the disposal of records. It was also the first known use of the now common phrase "permanent value or historical interest."

A provision similar to the one above appeared in the appropriations act of August 5, 1882. This one authorized the Secretary of the Treasury to sell worthless papers of the auditor of the Treasury for the Post

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[17] Ibid., p. 9.

[18] "An Act Making Appropriations for the Legislative, Executive, and Judicial Expenses of the Government . . . . ," United States Statutes at Large, XXI (Washington: United States Government Printing Office, 1881), pp. 385-413.

[19] Ibid., p. 412.

Office Department. Another act approved just two days later directed the clerk and doorkeeper of the House and the sergeant at arms of the Senate to sell valueless documents under supervision of the committee on accounts of their respective houses.[20]

The Middle Years (1879-1934)

The passage of large-scale pension legislation beginning in 1879 created new waves of unexpected proportions. It was not long before constituents were complaining to their Congressmen about delays in the payment of pensions. The logjam was discovered in the War Department. This department was expected to investigate each pension application and to produce evidence of service and hospitalization, but the records system was inadequate for the task.[21]

The time had come for a more thorough look at the organization and business methods of the various departments. The initiative came from one Senator F. M. Cockrell of Missouri. In December, 1886, he made the motion before the Senate that led to the formation of the Select Committee of the United States Senate to Inquire into and Examine the Methods of Business and Work in the Executive Departments, etc., and the Causes of Delays in Transacting the Public Business, etc.[22]

The work of this special committee extended over a period of years. During the course of its investigation, the committee learned of the existence of large deposits of noncurrent records which had been accumulated. In its opinion, these records were not necessary for the transaction of current business, and they lacked permanent value or

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[20]Beers, op. cit., 185.

[21]Siert F. Riepma, "Portrait of an Adjutant General," Journal of the American Military History Foundation, II (Spring, 1938), 26-35.

[22]Gustavus A. Weber, Organized Efforts for the Improvement of Methods of Administration in the United States (New York: D. Appleton and Co., 1919), pp. 57-58.

historical interest.[23]

The efforts of the Cockrell Committee resulted in the passage of the first general act for the destruction of worthless records of the federal government. It was ascertained that there were only three laws, those passed in 1881 and 1882, previously referred to, relating to this subject; and the special provisions of those laws provided no procedures for determining the value of records, nor did they provide for adequate reporting.[24] Therefore, on February 16, 1889, "An act to authorize and provide for the disposition of useless papers in the Executive Departments" was passed by Congress. The law read as follows:

> Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That whenever there shall be in any one of the Executive Departments of the Government an accumulation of files of papers, which are not needed or useful in the transaction of the current business of such Department and have no permanent value or historical interest, it shall be the duty of the head of such Department to submit to Congress a report of that fact, accompanied by a concise statement of the condition and character of such papers . . . .[25]

Other provisions of the law directed the presiding officer of the Senate to appoint two senators and the Speaker of the House of Representatives to appoint two representatives to act as a joint committee to consider reports submitted by the departments. The committee's report and recommendations were to be forwarded to the Senate and House, respectively. If the committee concurred that the records were not useful in the transaction of current business, and that they had no permanent value or

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[23] Report of Select Committee, op. cit.

[24] Emmett J. Leahy, "Reduction of Public Records," The American Archivist, III, No. 1 (January, 1940), 28.

[25] "An Act to Authorize and Provide for the Disposition of Useless Papers in the Executive Departments," United States Statutes at Large, XXV (Washington: United States Government Printing Office, 1887-89), p. 672.

historical interest, then the department heads were authorized to sell, or otherwise dispose of, the papers. Any proceeds were to be paid into the Treasury and reported to Congress.

The Act of 1889 continued to be the principal statute under which records were handled until the passage of the National Archives Act in 1934.[26] However, a number of significant changes did take place in the interim. The first of these changes was a provision in the appropriations act of March 2, 1895 which amended the law "to include in its provisions any accumulation of files of papers of a like character therein described now or hereafter in the various public buildings under the control of the several Executive Departments of the Government."[27] Apparently, the original law did not cover records stored by departments in buildings other than the ones in which they were located.

At least six acts of Congress subsequent to that of 1889 provided for the disposal of specific types or classes of records without the requirement that they be reported to Congress.[28]

One department, the Department of Agriculture, did not make use of the Act of 1889. Instead, it secured the passage of a special act in 1907 which gave a blanket authorization to the Secretary of Agriculture to "sell as waste paper, or otherwise dispose of the accumulation of Department files which do not constitute permanent records, and all other documents and publications which have become obsolete or worthless."[29]

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[26]Beers, op. cit., 187.

[27]"An Act Making Appropriations for Sundry Civil Expenses of the Government. . . . ," United States Statutes at Large, XXVIII (Washington: United States Government Printing Office, 1895), p. 933.

[28]Leahy, loc. cit.

[29]Beers, op. cit., 189.

A significant modification in procedure was inaugurated by President William Taft in an executive order dated March 16, 1912:

> It is hereby ordered that before reporting to Congress useless files of papers to be disposed of under the provision of the Act of February 16, 1889, as extended and amended by Section I, Chapter 189, of the Act of March 2, 1895, lists of such papers shall be submitted to the Librarian of Congress in order that the several Executive Departments may have the benefit of his views as to the wisdom of preserving such of the papers as he may deem to be of historical interest.[30]

For the first time in a records management program, professional judgment was injected into the process of screening administratively "useless" records for other values.

The year 1930 introduced the use of a retention and disposal schedule by a governmental agency. Exercising the authority conferred upon them by the Secretary of Agriculture, the Forest Service of the Department of Agriculture developed procedures that included the use of a schedule covering all its records.[31]

The Modern Era (1934-1960)

By 1934, the United States had reached its 158th birthday. For these many years, the federal government had been making records of its activities. As the activities increased, so did record making. The result was an accumulation of some seven million cubic feet of papers.[32] The care of these records was a problem that could not be avoided.

Congress responded with the National Archives Act of June 19, 1934.[33]

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[30] U. S. President, Executive Order No. 1499, March 16, 1912.

[31] Beers, op. cit., 200.

[32] Phillip M. Hamer, "Finding Mediums in the National Archives: An Appraisal of Six Years Experience," The American Archivist, V (April, 1942), 82.

[33] "An Act to Establish a National Archives of the United States Government. . . . ," United States Statutes at Large, XLVIII, Part 1 (Washington: United States Government Printing Office, 1934), pp. 1122-1124.

R. D. W. Connor, the first Archivist of the United States, described the achievement as "the concrete expression of a national ideal. No single person, no single group of persons created it. The ideal is as old as the nation, the institution as young as yesterday."[34] To better understand his feeling, one has only to recapitulate the events leading to passage of the Act:

> It was President Hayes who, in 1877, first recommended to Congress the erection of a suitable repository for the nation's archives and his recommendation came to fruition half a century later when Congress authorized the erection of the National Archives building. The appropriation was made upon the recommendation of President Coolidge; the cornerstone was laid by President Hoover; the act creating the National Archives establishment was signed by President Roosevelt. It is truly a national institution.[35]

The Act provided for the creation of the Office of Archivist of the United States and a National Archives Council. The Archivist, to be appointed by the President with the advice and consent of the Senate, was given the authority to inspect the records of any agency of the government and the power to requisition for transfer to the National Archives any records approved by the National Archives Council.[36] He could also make regulations for arrangement, custody, use, and withdrawal of materials deposited in the Archives, and he was given immediate custody and control of the National Archives Building.

The National Archives Council was to be composed of the Secretaries of each of the executive departments, the Chairman of the Senate Committee

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[34] R. D. W. Connor, "Adventures of an Amateur Archivist," The American Archivist, VI, No. 1 (January, 1943), 3.

[35] Ibid.

[36] The head of an executive department, independent office, or other agency of the government could, for a period not to exceed the duration of his tenure in that office, exempt from examination and consultation confidential matter transferred from his department or office.

on the Library, the Chairman of the House Committee on the Library, the Librarian of Congress, the Secretary of the Smithsonian Institution, and the Archivist. It was the Council's responsibility to define the classes of materials that would be transferred to the Archives and to establish regulations governing transfers. In addition, the Council had the "power" to advise the Archivist with respect to regulations governing the disposition and use of the archives and records transferred to his custody.[37]

Section nine of the Act specified that the Archivist submit to Congress, at the beginning of each regular session, a report for the preceding fiscal year. The report was to include a detailed statement of all accessions and of all receipts and expenditures. On January 1 of each year, with the approval of the Council, the Archivist was to transmit a list or description of papers, documents, and other records which appeared to have no permanent value or historical interest. If the governmental agency concerned concurred with the report and if Congress approved it, these records were destroyed or otherwise disposed of.[38]

It is difficult to visualize the complexity and magnitude of the problems faced by the Archival staff those first few years. Phillip M. Hamer, in appraising the initial experience, explained it this way:

> For the solution of this over-all problem the National Archives could not fully profit by obedience to the wise injunction boldly carved beneath one of the great stone figures which guard its Pennsylvania Avenue entrance, "Study the Past." There was no archival segment of that totality of human experience called history from the study of which this new archival agency could learn all the answers to the questions of policy and technique it must give. In assembling its staff, it could not bring to the solution of its problems men and women fully

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[37] "An Act to Establish a National Archives . . . . ," op. cit., p. 1123.

[38] Ibid.

trained for their new duties either in universities or the school of experience.[39]

Procedurely speaking, the National Archives Act greatly enhanced that segment of records management dealing with the preservation of records. More specifically, it included provisions for the inspection, classifications, requisition, transfer, custody, use, and withdrawal of valuable records. Comparatively speaking, the complementary segment, records reduction, received little attention. With the exception of submitting all departmental reports through the Archivist, procedures for the disposition of valueless records remained basically the same as those established in 1889. These procedures coupled with the supplemental or special legislation passed between 1889 and 1934 had, by the mid-thirties, resulted in confusion and inconsistency. Unnecessary and costly routine was quite apparent. To clarify and improve this situation and to insure and safeguard the reduction of federal records, a comprehensive and noteworthy procedure was approved by President Roosevelt on August 5, 1939.[40]

In addition to the already established procedures for reports on accumulations from department heads to the Archivist and the subsequent review by a joint committee of Congress, the new provisions contained a number of unique features:

1. A thorough description of records involved. The written report was to state the location and describe the character of the records that appeared to have no permanent value or historical interest. To further help the archival staff identify the records correctly, a sample of each

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[39]Hamer, op. cit., 83.

[40]"An Act to Provide for the Disposition of Certain Records of the United States Government," United States Statutes at Large, LIII, Part 2 (Washington: United States Government Printing Office, 1939), pp. 1219-1221.

record was to accompany the report.

2. A definition of records: "When used in this Act, the word 'records' means originals or copies of motion-picture or other photographic records in any form whatsoever, sound recordings, correspondence, papers, indexes, maps, charts, plans, drawings, punch cards, tabulation sheets, pictures, and other kinds of records belonging to the United States Government."[41]

3. Prescribed methods for the disposal of records: "(a) By sale, upon the best obtainable terms after due publication of notice inviting proposals therefor; (b) By causing them to be destroyed; (c) By transfer . . . to any State or dependency . . . or any appropriate educational institution, library, museum, historical, research, or patriotic organization therein, that has made application . . . ."[42]

4. Provisions for handling the disposition of records between congressional sessions and in the event the joint committee failed to meet.

5. A comprehensive reporting system progressing from the agencies; to the Archivist; to Congress.

6. Special provisions for the destruction of records considered a "menace to human health or life or to property."

7. A provision requiring responsible management of governmental records.

The growing realization that the archival staff was amassing a store of knowledge concerning the management of current records, together with an ever-increasing number of requests from other agencies for information and advice, led to the formal establishment of a records administration

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[41] Ibid., p. 1219.

[42] Ibid., p. 1220.

program by the National Archives early in 1941. This activity was described as one "'to assist in developing throughout the Government principles and practices in the filing, selection, and segregation of records that will facilitate the disposal of or transfer to the National Archives of records as they become noncurrent.'"[43]

After a brief space of four years, the archival staff and Congress were again feeling the need for additional legislation. One reason for the increased interest was World War II. The National Archives, like all government agencies, had altered its operations to meet the pressing demands of wartime. By 1943, the conflict was approaching its zenith, and the activities associated with war were accelerating the rate of records growth and establishing new priorities. Organization, control and security of information were of utmost importance. It was in this climate that Congress dispatched the Records Disposal Act of 1943.[44]

The definition of records was the first item to be revised by the new act. As revised, the word "records" included:

> all books, papers, maps, photographs, or other documentary materials, regardless of physical form or characteristic, made or received by any agency of the United States Government in pursuance of Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data contained therein.[45]

Sections two and three of this Act were probably the two most

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[43]Phillip C. Brooks, "The Archivist's Concern in Records Administration," The American Archivist, VI, No. 3 (July, 1943), 160.

[44]"An Act to Provide for the Disposal of Certain Records of the United States Government," United States Statutes at Large, LVII, Part 1 (Washington: United States Government Printing Office, 1943), pp. 380-383.

[45]Ibid., p. 380

momentous and far-reaching provisions relating to records management to be enacted by a governmental body. In the first instance, the National Archives Council was instructed to promulgate regulations establishing (1) procedures for preparing and submitting to the Archivist lists and schedules of records proposed for disposal, (2) procedures for the disposal of records, and (3) standards for the reproduction of records by photographic or microphotographic processes with the objective being disposal of the original records.

In accordance with the regulations provided for above, the heads of agencies were required to submit to the Archivist (1) lists of the records in their custody that had been photographed or microphotographed and that appeared to have insufficient value to warrant further preservation, (2) lists of any other records in their custody that were not needed for the transaction of current business and that appeared to have insufficient administrative, legal, research, or other values to warrant further preservation, and (3) schedules containing suggested retention periods (disposal after the lapse of specified periods of time) for records of a specific form or character that either had been accumulated by the agencies, or might be accumulated at any time after the schedules were submitted, and did not have, after the retention periods specified, sufficient administrative, legal, research, or other values to warrant continued preservation.

Under these provisions, the disposition of records was no longer left to the discretion of the agencies. It was mandatory. The Act declared that the regulations developed by the National Archives Council "shall be binding on all agencies of the United States Government."[46]

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[46] Ibid., p. 381.

Also of consequence was the recognition that records could have values other than those of "permanent value or historical interest." The additions included legal, research, and other values. Each record series could now be viewed as having a possible administrative, historical, legal, research, or other value.

Other notable sections of the Records Disposal Act included provisions for eliminating duplications, for securing clearances, before disposal, on records pertaining to claims and demands by the Government, for emergency disposal of records in the time of war, and for accepting photographs or microphotographs as original for the purpose of their admissibility in evidence.

As a result of the above legislation, the National Archives anticipated a flood of schedules from the agencies, but the flood never came. By October, 1944, twenty-six agencies had submitted schedules, and only six agencies had scheduled an appreciable portion of their records.[47] Consequently, the National Archives decided to seek an amendment of the 1943 Act. This amendment was approved and became a part of the Records Disposal Act on July 6, 1945.[48]

Whereas the original law provided for separate schedules to be prepared by the heads of departments and submitted to the Archivist, the amendment gave the Archivist authority to develop general schedules, i.e., schedules which made one listing of records held in common by several or all agencies. Since control over development of the general schedules

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[47]Isadore Perlman, "General Schedules and Federal Records," The American Archivist, XV, No. 1 (January, 1952), 27.

[48]"An Act to Amend the Act Entitled 'An Act to Provide for the Disposal of Certain Records of the United States Government,'" United States Statutes at Large, LIX, Part 1 (Washington: United States Government Printing Office, 1945), p. 434.

resided with the Archivist, any authorization to agencies to dispose of records relative to such schedules was to be permissive and not mandatory.

In compliance with Section 2 of the Disposal Act, the National Archives Council adopted a set of regulations concerning the disposal of records on July 30, 1945, and transmitted copies to the heads of all agencies on August 15, 1945.[49] The regulations on procedures for compiling and submitting lists and schedules to the Archivist were quite simple. They required that the lists and schedules "be submitted on forms supplied or approved by the Archivist in the number of copies required by him and shall contain such information as may be called for by the said forms and by instructions issued by the Archivist."[50] Samples of the records in question were to accompany the completed forms.

Item 2 of the regulations expanded upon the procedures for disposal of records approved by President Roosevelt in 1939. According to the new regulations, the records authorized for disposal could be:

> (a) . . . sold as waste paper: Provided that, unless the said records shall have been treated in such a manner as to destroy their record content, any contract for sale of them shall prohibit their resale as records or documents; (b) . . . destroyed, if they cannot advantageously be sold or if, in the opinion of the head of the agency having custody of said records, destruction is necessary to avoid the disclosure of information that might be prejudicial to the interests of the Government or of individuals; or (c) . . . transferred, with the approval of the Archivist of the United States and without cost to the United States Government, to any government, organization, institution, corporation, or person that has made application for them.[51]

The third and final set of regulations dealt with standards for the reproduction of records by photographic or microphotographic processes

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[49] The National Archives, How to Dispose of Records (Washington: United States Government Printing Office, 1946), pp. 26-27.

[50] Ibid., p. 26.

[51] Ibid.

with the disposal of original records in view. First to be established was the fundamental principle that "records shall be photographed in such order that the integrity of the files will be preserved."[52] Secondly, photographic film, paper, and processing were to comply with minimum standards approved by the National Bureau of Standards.

Issued by the National Archives at about the same time as the regulations was a manual, How to Dispose of Records (February, 1945). Solon J. Buck, then Archivist of the United States, described the manual as an effort "made not only to describe and explain the law, regulations, and procedures governing the disposal of records but also to make as many practical suggestions as possible for the planning and operation of records disposal programs."[53]

The revised edition of this manual issued in 1946 set forth very thorough procedures for conducting a records disposal program. The major steps in the program outline were: "Beginning a disposal program," "Making a records survey," "The evaluation of records," "Preparing and clearing lists and schedules," "General schedules," and "Putting approved lists and schedules into effect."[54]

Beginning in 1946, a series of events dictated modifications that would change significantly the course of records management within the federal government. On September 25 of this year, President Harry S. Truman issued an executive order in which he directed the head of each agency to develop "an active continuing program for the effective

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[52] Ibid.

[53] Ibid., p. i.

[54] Ibid., p. iii.

management and disposition of its records."[55] Agencies were instructed to maintain only those records needed to conduct current business. All other records were to be transferred to the National Archives or proposed for other disposition in accordance with law.

As a matter of expediency, the President also transferred major responsibility for records management to the Bureau of the Budget:

> . . . , the Director of the Bureau of the Budget with the advice and assistance of the National Archives shall conduct such inspections, require such reports, and issue such directives and regulations as he may deem necessary to carry out the provisions of this order.[56]

The rationale behind this decision must have been something like this: Existing laws have failed to prevent the accumulation of 18,000,000 cubic feet of records and the situation is getting worse. Solution to the problem seems to be a matter of stricter enforcement, and the Bureau of the Budget has the necessary controls to force a degree of compliance.

Needless-to-say, this move was an unexpected and unpleasant surprise to the archivists. Archival historian, H. G. Jones, for one, believed that "based upon a broad interpretation of the National Archives Act of 1934 and upon the principle enunciated by the Society of American Archivists in 1940 . . . the full responsibility outlined in the executive order should have been placed in the National Archives."[57] Although this action created a great deal of apprenhension among the archival staff, it was but a foreshadow of things to come. According to Jones, "there

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[55]U. S. President, Executive Order No. 9784, September 25, 1946.

[56]Ibid.

[57]H. G. Jones, The Records of a Nation (New York: Atheneum, 1969), p. 33.

appears to have been no suspicion on the part of the Archivist that some day this leverage would be used as an argument for placing records management in a general services agency."[58]

The second episode in the fast-moving series began on July 7, 1947, when President Truman approved the Lodge-Brown Act, thus establishing the Commission on Organization of the Executive Branch of the Government.[59]

Two years had passed since the end of World War II. Annual budgets were still very high, and the activities of the Government showed no signs of shrinking to their pre-war levels. There was a feeling in many quarters that the only hope of effecting economics lay in the promotion of greater efficiency in the operations of the Government through a reshaping of its organizational structure.[60] Such was the assignment of the bipartisan Commission headed by former President Herbert Hoover.

More specifically, the Commission was asked to study and investigate the organization and methods of operation of all departments, bureaus, agencies, boards, commissions, offices, independent establishments and instrumentalities of the executive branch of the Government, to determine what changes were necessary to accomplish the following purposes: (1) to limit expenditures to the least amount consistent with the efficient performance of essential services and functions, (2) to eliminate duplication and overlapping of activities, services, and functions, (3) to consolidate

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[58] Ibid.

[59] "An Act for the Establishment of the Commission on Organization of the Executive Branch of the Government," United States Statutes at Large, LXI, Part 1 (Washington: United States Government Printing Office, 1947), pp. 246-248.

[60] Robert W. Krauskopf, "The Hoover Commissions and Federal Record-Keeping," The American Archivist, XXI, No. 4 (October, 1958), 374.

services, activities, and functions of a similar nature, (4) to abolish services, activities, and functions not necessary to the efficient conduct of government, and (5) to define and limit executive functions, services, and activities.[61]

To assist the Commission in its work, more than 300 outstanding individuals in various technical fields were recruited to serve on some twenty-four research groups, or task forces. However, the administration of Government records was not one of the items on the original agenda.[62]

Emmett J. Leahy, Executive Director of the National Management Council and a former member of the National Archives staff, was the first of a number of interested parties to discuss with the Commission staff ways in which economies could be introduced into the handling of Government records. The discussions began the first part of January, 1948; and, before the end of the month, Leahy had submitted a detailed proposal to the Commission outlining the scope of the records problem and suggesting ways and means of dealing with it.[63]

Wayne C. Grover, Archivist of the United States in 1948, also had the idea of recommending a task force in records management. About the time work groups were being formed, he directed Oliver Holmes, Program Adviser at the Archives, to prepare a letter calling the attention of the Chairman of the Commission to the need for a task force to consider the records management problem in the federal government. "At the time," said Holmes, "it was felt that such a study, if made, would have the virtue of drawing attention to the problem and, perhaps, pointing up the

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[61] "An Act for the Establishment of the Commission on Organization of the Executive Branch of the Government," loc. cit.

[62] Krauskopf, op. cit., 375.

[63] Ibid.

alternatives. It was not supposed that it would have much other practical effort."[64] Grover, himself, had hoped that the study would accomplish three things: "Strengthening the then existing Budget Bureau staff working in the field of current records management; providing a statutory basis for agency programs; and finally, strengthening our case in the National Archives for the establishment of a number of strategically located Federal Records Centers."[65]

After due consideration of these proposals and recommendations, the Hoover Commission entered into a contract with the National Records Council on April 12, 1948. The Council, with Leahy at the helm, agreed to make a "task force" study of the records management problem in the federal government for a fee of $8,250.[66] Grover took credit for recommending Leahy for the job, but later expressed regret in doing so.[67]

The reason for these ambivalent feelings was contained in the Task Force Report on Records Management submitted to the Hoover Commission on October 14, 1948.[68] The report, unofficially known as the "Leahy Report," was written by Leahy himself. It embodied his own views and was expressed in his own language, but all members of the task force concurred in its major points.[69]

The report began by drawing attention to the magnitude of the

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[64]Oliver W. Holmes, "The National Archives at a Turn in the Road," The American Archivist, XII, No. 4 (October, 1949), 347.

[65]Wayne C. Grover, "Recent Developments in Federal Archival Activities," The American Archivist, XIV, No. 1 (January, 1951), 8.

[66]Krauskopf, op. cit., 376.

[67]Grover, op. cit., 9.

[68]Commission on Organization of the Executive Branch of the Government, Records Management in the United States Government: A Report with Recommendations (Washington: United States Government Printing Office, 1949).

[69]Krauskopf, op. cit., 377.

federal records problem and to the excessive burden that the cost of such operations imposed on the taxpayer, but it quickly focused upon three general recommendations:

1. That a Federal Records Administration be created. This new bureau would incorporate the existing National Archives Establishment and would have responsibility for establishing and operating Federal records centers and for developing and promoting improvements and economies in records management throughout the Government. Special provisions would be made for preserving, studying and servicing records having permanent value and historical interest.

2. That a new law entitled the "Federal Records Management Act" be enacted to provide for the creation, preservation, management, and disposal of records of the Government

3. That each department and agency of the Government be required to maintain a "minimum" records program and that a qualified records management officer be appointed to plan, develop, and organize the program.[70]

The first of these recommendations "came as a surprise, and immediately met with spirited opposition within the [National Archives] agency."[71] What had become a reluctant, but steadily growing, investment in records management was suddenly challenged by the recommendations of a former colleague.

In defending his position, Leahy reasoned that "the essential specialized function of The National Archives is limited to only 5 percent of Federal records," and that "the 95 percent of Federal records outside The National Archives present primarily a management rather than an

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[70]Commission on Organization . . . , op. cit., pp. 6-12.

[71]Holmes, op. cit., 348.

archival problem."[72] To place the new records management functions in the National Archives "would change the character and scope of the National Archives so radically as to create, in fact, a new kind of agency."[73]

From the archivist point of view, Leahy had failed to see "that it was he who proposed to 'change the character and scope of the National Archives so radically as to create, in fact, a new kind of agency.'"[74] To them,

> He [Leahy] advocated a disavowal of the nurturing principles that had ushered in the new profession and such examplars of its techniques as himself. He was advocating, in brief, not the principle of continuity but the principle of separation. It was, furthermore, no argument to say that the specialized function of the National Archives was limited to only 5 percent of federal records. Connor and Buck had seen this long before Leahy did, and he could use it as an argument only by forgetting entirely the insistence of Buck, Brooks, and others on the principle that responsibility for that 5 percent could be met effectively only by being involved in decisions concerning the other 95 percent.[75]

Irrespective of the arguments, the current was definitely running with Leahy. Even his critics acknowledged that the task force report was a masterful exercise in salesmanship. "Such devices of salesmanship had been employed successfully in the business community . . . . They were now wielded with equal effect upon a public commission whose mandate was economy in government."[76]

Behind the scenes, other forces were acting that would prove to be even more powerful in directing the eventual outcome of legislation. First

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[72]Commission on Organization . . . , op. cit., p. 24.

[73]Ibid., p. 23.

[74]Jones, op. cit., p. 44.

[75]Ibid.

[76]Ibid., p. 46.

was the strong belief by administrators and political scientists that there were too many independent agencies in the federal government and that the President's span of control was overextended.[77] The reorganization proposals of the Hoover Commission alone included plans for some twenty fewer agencies reporting directly to the President.[78] Second was the demand for a central general services agency. When the Hoover Commission read Leahy's report with its strong emphasis on the proposed Federal Records Administration as a service agency, they associated it with other general service and housekeeping agencies of the government. Consequently, the Commission's report on the Office of General Services issued in February, 1949, and the Concluding Report published in May, 1949, recommended the creation of a Records Management Bureau in the Office of General Services. The National Archives would then become a part of the new Bureau.[79] Finally, there was the movement toward economy, including the more effective management of records within the federal government.

On March 1, 1949, the President asked all effected departments and agencies for their comments and any recommendations they wished to make regarding the reports prepared by the Hoover Commission. The Archivist of the United States prepared a formal reply and channeled it through the Director of the Bureau of the Budget on March 21. The reply was, in effect, a final, comprehensive argument for the continued independence of the National Archives.[80] "The National Archives was caught, however, in a

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[77]Holmes, op. cit., 340.

[78]Commission on Organization of the Executive Branch of the Government, Concluding Report: A Report to the Congress (Washington: United States Government Printing Office, 1949), p. 53.

[79]Commission on Organization of the Executive Branch of the Government, Office of General Services: A Report to the Congress (Washington: United States Government Printing Office, 1949), pp. 6-8, and Ibid., p. 54.

[80]Krauskopf, op. cit., 382.

stream of events that was moving too rapidly."[81]

By June of 1949, a host of bills had been introduced by both houses of Congress to carry various recommendations of the Hoover Commission into effect, and circumstances were such that the administration decided to give priority to the proposal for an Office of General Services. Thus, there was strong pressure for action by the session of Congress then in progress.

The House Committee on Expenditures in the Executive Department had been working for some time on a bill to improve property management in the Federal Government. Upon release of the Hoover Commission reports, the Committee revised its bill to bring it more into line with the Commission's recommendations on general services, "including at the last minute, on the recommendation of Hoover Commission representatives, the insertion of Section 104 on records management."[82] The new bill passed the House on June 8, 1949, and was handed to the Senate, but it did not include the provision for a Bureau of Records Management.

Not long after the bill reached the Senate, the National Archives was again called upon for its comments and recommendations. This time, it was the Senate Committee on Expenditures in the Executive Department seeking information in connection with its version of the House bill. The Archives' response included a discussion on the Leahy Report and the Hoover Commission Report; but, instead of suggesting centralized direction of records management as it had done earlier, it proposed that direction be given by new organizational units within the framework of the National Archives. Whether the statement had any affect on Committee deliberations

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[81] Holmes, op. cit., 349.

[82] Ibid.

is doubtful. Time was short, and the new act was needed to replace existing legislation due to expire at the end of the fiscal year.[83]

The Senate bill—S. 2020—moved through Congress without delay and was signed into law by President Truman on June 30, 1949.[84] As Oliver W. Holmes expressed it, "The National Archives staff awoke on July 1 to find themselves members of a new agency, the General Services Administration."[85]

Section 104 of the new Federal Property and Administrative Services Act of 1949 made the following provisions for transfer of the National Archives:

> (a) The National Archives Establishment and its functions, records, property, personnel, obligations, and commitments are hereby transferred to the General Services Administration. There are transferred to the Administrator (1) the functions of the Archivist of the United States, except that the Archivist shall continue to be a member or chairman, as the case may be, of the bodies referred to in subsection (b) of this section, and (2) the functions of the Director of the Division of the Federal Register of the National Archives Establishment. The Archivist of the United States shall hereafter be appointed by the Administrator.
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> (c) The Administrator is authorized (1) to make surveys of Government records and records management and disposal practices and obtain reports thereon from Federal agencies; (2) to promote, in cooperation with the executive agencies, improved records management practices and controls in such agencies, including the central storage or disposition of records not needed by such agencies for their current use; and (3) to report to the Congress and the Director of the Bureau of the Budget from time to time the results of such activities.[86]

Congress had not accepted the idea of a records management bureau

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[83]Krauskopf, op. cit., 383.

[84]"An Act to Simplify the Procurement, Utilization, and Disposal of Government Property, to Reorganize Certain Agencies of the Government, and for Other Purposes," United States Statutes at Large, LXIII, Part 1 (Washington: United States Government Printing Office, 1949), pp. 377-403.

[85]Holmes, op. cit., 350.

[86]"An Act to Simplify the Procurement . . . ," op. cit., p. 381.

as recommended by the Hoover Commission. Instead, it had indiscriminately placed both archival and records management functions under the general supervision of the Administrator of the newly created General Services Administration. Within six months, however, Jess Larson, the new Administrator, was convinced that a change was in order. Whereupon, he issued an order creating the present National Archives and Records Service.[87] This action had the effect of placing records management back under the Archivist of the United States.

The Federal Property and Administrative Services Act had, in very general terms, authorized the General Services Administration to promote better management of records on a government-wide scale; but, as such, it was only an administrative stopgap. It remained for further legislation to define in specific terms the responsibilities of the General Services Administration and other federal agencies in records management.[88]

The enabling law, the Federal Records Act of 1950, was not long in coming.[89] It repealed the National Archives Act of 1934 and placed virtually all archival and records management authority with the Administrator of the General Services Administration.

In the area of records management, the Administrator was charged with analyzing, developing, promoting, and coordinating standards, procedures, and techniques "designed to improve the management of records, to insure the maintenance and security of records deemed appropriate for

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[87] U. S. General Services Administration Administrative Order No. 27, December 1, 1949.

[88] Krauskopf, op. cit., 384.

[89] "An Act to Amend the Federal Property and Administrative Services Act of 1949, and for Other Purposes," United States Statutes at Large, LXIV, Part 1 (Washington: United States Government Printing Office, 1952), pp. 578-591.

preservation, and to facilitate the segregation and disposal of records of temporary value" and with promoting "the efficient and economical utilization of space, equipment, and supplies needed for the purpose of creating, maintaining, storing, and servicing records."[90] He was also required to "establish standards for the selective retention of records of continuing value, and assist Federal agencies in applying such standards to records in their custody . . . ."[91] And, in keeping with the Hoover Commission recommendations, the Administrator was specifically authorized "to establish, maintain, and operate records centers for the storage, processing, and servicing of records for Federal agencies . . . ."[92]

Section 506 was a significant addition to the Act in that it provided for, and gave direction to, a records management program in each agency. In this section, the head of each agency was directed to make and preserve records that adequately documented the organization, functions, policies, decisions, procedures, and essential transactions of the agency and to establish and maintain an active, ongoing program for the economical and efficient management of these records. For the first time in Federal legislation, the full complement of records management activities was incorporated in a records program, i.e., the law provided for effective control over the creation, maintenance, and use of records. Finally, agency heads were asked to provide for the storing, processing and servicing of appropriate records by transferring them to centers operated by the Administrator, or, when approved by the Administrator, by maintaining them in centers operated by the agencies.

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[90] Ibid., p. 585.

[91] Ibid.

[92] Ibid.

The Act also abolished the National Archives Council and replaced it with a Federal Records Council for the purpose of advising and assisting the Administrator in carrying out the provisions of the law. Critics were quick to note that the new Council was a weak body. It could only give "advice and assistance" when called upon.

Like most recent legislation, the Federal Records Act assigned all duties and responsibilities to the head of the agency and assumed that he would in turn delegate some or all of them to qualified assistants. This the Administrator did in September of 1950 when he delegated to the Archivist of the United States all the archival and records management functions assigned to him by the Records Disposal Act of 1943, the Federal Property and Administrative Services Act of 1949, and the Federal Records Act of 1950.[93]

A Records Management Division had been created within the National Archives and Records Service in December, 1949, to serve as a focal point for the government-wide program. In September, 1950, a Records Management Service was established in each of the ten General Services Administration regions to spread the program to Federal agencies outside Washington.[94]

By June 30, 1952, nine Federal records centers had been established throughout the country. These centers, originally recommended by the Leahy Task Force and the Hoover Commission, served a number of needs. They provided: (1) additional space for records scheduled for transfer to the National Archives, (2) a screening and staging area for records ultimately destined for the National Archives, (3) a regional archives for housing records of permanent value, but primarily of regional interest, and

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[93]Herbert E. Angel, "Federal Records Management Since the Hoover Commission Report," The American Archivist, XVI, No. 1 (January, 1953), 14-15.

[94]Ibid.

(4) a low-cost storage area for inactive records that would eventually be destroyed.[95]

The final event of "The Modern Era" was inaugurated on July 10, 1953. On this date, President Dwight D. Eisenhower signed into law the Brown-Ferguson Act which provided for a second Commission on Organization of the Executive Branch of the Government.[96] This Commission, like the first, was authorized to select its own chairman, and again it chose Herbert Hoover.

The first Commission, just six years earlier, had established an enviable record in its attempt to reorganize the Federal Government. It had made 273 distinct recommendations, and as far as could be determined, about 72 percent of these were adopted either through administrative action or through legislation.[97]

Unfortunately, soon after the first Commission had finished its work, fighting broke out in Korea. As with previous wars, old problems were made more complicated and new ones were created. Governmental activity increased, and the federal budget almost doubled. By 1952, the annual rate of increase of federal records had risen to well over 3 million cubic feet. Congress was persuaded that another comprehensive study of organization, methods, and functions was needed to help eliminate the many weaknesses, and that a second Commission was the best means of accomplishing the task.[98]

Major differences in the method of operation between the two

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[95]Jones, op. cit., p. 182.

[96]"An Act for the Establishment of a Commission on Government Operations," United States Statutes at Large, LXVII (Washington: United States Government Printing Office, 1953), pp. 142-145.

[97]Krauskopf, op. cit., 386.

[98]Ibid.

Commissions were clarified in the final report of the second Commission released in 1955:

> . . . the first Commission concerned itself chiefly with reorganization of departments and agencies and their relations with each other. That Commission's proposals were directed to removing the roadblocks to more effective organization and the reduction of expenditures.
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> This Commission has dealt more extensively with the functional organization of the executive branch and with questions of policy than the first Commission. We have therefore based recommendations on examination of related functions straight across the executive branch (with one exception—the Department of Defense).[99]

The second Hoover Commission commenced its duties in the fall of 1953, but it did not turn its attention to records problems until the following summer. On June 20, 1954, a task force on records was established and Mr. Hoover again selected Emmett J. Leahy to serve as chairman.[100]

The new study group called itself the Paperwork Management Task Force. The term, records management, was avoided primarily for one reason: government and industry had tended to associate it with records storage and disposal only. The new term was needed to convey the much broader responsibilities of the second task force.

Instead of concerning itself with records disposition and the wastes of the past, the task force became more involved with the record-making and maintenance processes. The final report covered four areas dealing with the creation of records: correspondence management, forms management, reports management, and directives and instructions management; and four areas dealing with the maintenance of records: filing systems, quality control, policy regarding the use of business machines and

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[99]Commission on Organization of the Executive Branch of the Government, Final Report to the Congress (Washington: United States Government Printing Office, 1955), p. 5.

[100]Krauskopf, op. cit., 388.

classification standards for personnel working in paperwork programs.[101]

The report submitted by Leahy to the Commission on November 19, 1954, bore many resemblances to its predecessor of six years earlier. It relied heavily on statistics and dwelt at length on examples of "poor" paperwork management.[102]

In its own report to Congress, the Commission repeated in condensed and simplified language most of the findings of the task force. It did not, however, agree exactly with the major recommendations of the task force. Instead of stressing organizational terms in its first general recommendation, as the task force had done, the Commission subordinated these to functional terms and allowed more latitude in their application:[103]

> We recommend that: (a) the President establish by Executive order and direct his top officials to give their support to a governmentwide paperwork management program; (b) the General Services Administration be given responsibility for general supervision over all phases of paperwork management throughout the executive branch of the Government with a view to simplifying and improving the quality of forms, correspondence, reports, and other documents, eliminating nonessential copies of material, reducing the volume and cost of paperwork that is currently required to be produced, issued, filed, and stored, and standardizing the procedures and practices relating to paperwork management; (c) such staff functions of paperwork management as now exist in the National Archives and Records Service be consolidated into the organization established in the General Services Administration to implement our recommendation.[104]

A second major recommendation of the Commission called upon each agency to assign a high-ranking official with the responsibility of

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[101]Commission on Organization of the Executive Branch of the Government, Paperwork Management; Part I—In the U. S. Government: A Report to the Congress (Washington: United States Government Printing Office, 1955), pp. 5-13.

[102]Krauskopf, op. cit., 390.

[103]Ibid., 392.

[104]Commission on Organization of the Executive Branch of the Government, Paperwork Management, op. cit., pp. 17-18.

reviewing, simplifying, and reducing the volume of forms, correspondence, and reports within the agency. This official would also be expected to cooperate with the General Services Administration in developing ways and means of implementing the program.

Administrative action on these major recommendations came about in two separate events. In lieu of the executive order suggested by the first recommendation, the President in a Cabinet meeting on August 12, 1955, formally requested department and agency heads to cooperate with the General Services Administration; and, in keeping with section (b) of the same recommendation, he directed that the Administration serve in a central supervisory capacity with respect to paperwork management in the Executive Branch of the Government.[105]

In carrying out section (c) of the first recommendation, the Administrator of the General Services Administration decided that the function of records management should remain an integral part of the National Archives and Records Service, but in recognition of its importance and added scope, he did assign the new function to a newly established Office of Records Management, headed by an Assistant Archivist of the United States. The change became effective on November 1, 1956.[106]

The second major recommendation, which stipulated that paperwork management responsibilities be specifically assigned to high-ranking officials, was carried out over a period of time. In many cases, these responsibilities were assigned to agency record officers.

For purposes of record (or information) management theory, it is instructive that, within the Federal "super-agency" concept for

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[105]Krauskopf, op. cit., 393.

[106]Ibid.

ministering to records disposition needs, records officers belonging to the agency concerned with disposal problems made provisions for constituent participation in the process phase. This provision points to a principle about participation that seems significant for securing the proper input to the management scheme.

By 1960, "The Modern Era" was coming to a close and "records management had evolved . . . into a specialized phase of general management dealing with the origin, use, and control of records."[107]

Summary

At various times in its history, the Federal Government has been faced with a crisis in records accumulation. Each crisis renewed an awareness of records problems and prompted a review of the techniques and procedures available to combat them.

In retrospect, progress was slow. It took some 150 years for our lawmakers to shift their emphasis from one of just records accumulation to that of records disposition. However, a number of fundamental principles were developed during the early periods.

The Act of 1810 acknowledged the need for the safety of records and provided for the construction of fireproof rooms for the deposit of departmental records. The 1881 appropriations act for the Post-Office Department introduced another basic concept. In this Act, the Postmaster-General was authorized to sell as waste paper, or otherwise dispose of, papers that were not needed in the current transaction of business and that had no permanent value or historical interest. But, it was the work of the Cockrell Committee that led to the first general act for the disposal of records. Provisions of the 1889 Act contained special

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[107] Frank B. Evans, "Archivists and Records Managers: Variations on a Theme," The American Archivist, XXX, No. 1 (January, 1967), 52.

procedures for reporting and reviewing "worthless" records.

A modification in procedure by President William Taft in 1912 required that lists of useless files be submitted to the Librarian of Congress in order to have the "benefit of his views." Thus, professional judgment was introduced to the process of evaluating records.

The development and use of a retention and disposal schedule by the Forest Service in 1930 proved to be another significant contribution toward the professional development of records management, and it was the last innovative idea to be introduced prior to the modern period.

The National Archives Act of 1934 ushered in a new era. As previously stated, the Act greatly enhanced that segment of records management dealing with the preservation of records. It included provisions for the inspection, classification, requisition, transfer, custody, use, and withdrawal of valuable records.

In an effort to clarify procedures and remove inconsistencies, comprehensive changes were approved by President Roosevelt in 1939. Noteworthy features included the following: (1) an inventory of all records, including descriptions and location, (2) a working definition of records, (3) prescribed methods for disposal of records, and (4) a comprehensive reporting system.

With the advent of World War II, another concept evolved; namely, records of vital importance require a unique system of organization, control, and security. The Records Disposal Act of 1943 strengthened this posture by redefining procedures for preparing and submitting schedules, by tightening procedures for the disposal of records, and by setting standards for the reproduction of records by photographic or microphotographic means.

Prior to 1943, the perception of records values was embodied in the phrase "permanent value or historical interest," The Records Disposal Act expanded this concept to include administrative, legal and research values. Records could then be viewed as having administrative, historical, legal, research or other values.

The inability to obtain separate and complete schedules from each of the agencies and departments led to an amendment in the Records Disposal Act on July 6, 1945. This amendment gave the Archivist authority to develop general schedules. The concept of general schedules had several advantages: (1) they could be prepared by a central authority, (2) they eliminated multiple listings of records held in common by several agencies, and (3) they enabled the Archivist to identify source- or record-copies for retention purposes and to authorize the disposal of other copies after they had served their administrative functions.

A statement of extreme importance to the historian was drafted by the National Archives Council on July 30, 1945. In a set of regulations concerning the reproduction of records by photographic or microphotographic processes and the disposal of original records, the Council adopted the fundamental principle that records should be photographed in such a manner that the integrity of the files would be preserved.

Activities for the next fifteen years were devoted primarily to administrative reorganizations and to the refinement of procedures. One of the more notable contributions to records management during this period of history evolved from the work of Emmett J. Leahy. His report to the Hoover Commission in 1948, calling for the establishment of a number of Federal records centers, was later incorporated into the

Federal Records Act of 1950. The concept of strategically located records centers thus became another milestone in the professional growth of records management.

CHAPTER II

CIVIL LIBERTIES AND UNIVERSITY RECORDS: A CASE STUDY

For the most part, records management, as it has evolved and is practiced today, concentrates upon those aspects of record-keeping important to the organization, i.e., cost, space and time. By contrast, little attention has been devoted to the interests of individuals associated with the endeavors of the organization.

Of the many concerns, probably the most pressing and sensitive one relates to the protection of individuals' constitutional and personal rights. Universities are particularly vulnerable because a large portion of the information collected and processed in their offices contains data on or about the people who work for them or the students they serve.

Beginning with August 4, 1966, a series of events occurred that made The University of Michigan keenly aware of the civil liberties problem in record-keeping. On that date, the University received a subpoena issued by the Un-American Activities Committee of the United States House of Representatives. The writ was a demand for membership lists of certain student organizations thought to oppose the war in Vietnam. The University's response to the subpoena was of such consequence that it ushered in a new era with regard to the keeping of records.

Events Preceding the HUAC Decision

General concern over the collection and use of information on individuals was gaining visibility by the early 1960's. In student

affairs, the traditional parental responsibilities of the University with its legacy of immediate supervision (in loco parentis) was showing signs of stress and strain. Probably the most vulnerable area during this period was University residence housing with its systematic reporting on the behavior of students.

In a statement prepared about 1963, a former resident adviser in one of the men's residence halls described the process used to evaluate students.[108] According to his comments, the process of preparing reports began with the staff counselor. This individual, usually a "mature" junior or senior, lived on the same floor as the students he was to evaluate.

The next person in the evaluating and reporting sequence was the resident adviser. He was responsible for between 115-170 men. It was his job to review and approve the reports submitted by the staff counselors.

> Because of his greater distance from the residents, he undoubtedly is able to evaluate them in a slightly different manner than the Counselor. Indeed, he is encouraged to note his own impressions (hopefully informed), even if his judgment differs from his Counselor's.[109]

The process was further complicated by the inputs of the housemother. It was felt that she might "see a different picture of the student than has been shown to the male staff; and she is encouraged to so indicate it, although she will usually hesitate to oppose the judgment of her Resident Advisor."[110]

Eventually, the reports found their way to the Quadrangle Director who was responsible for between 900-1300 men. This individual was so far removed from residence living that he could hardly question the evaluations made by the house staff. So, at this level, form was emphasized.

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[108] Personal File No. 1, "The Residence Halls Reports on Male Students: Some Comments."

[109] Ibid., p. 2.

[110] Ibid.

Was the spelling correct? Were the forms neatly prepared?

From the Director's office, reports were assembled for distribution to the deans of particular colleges. Justification for the reports was in "terms of a need in the academic offices for information on students which may be helpful in understanding potential (or present) academic problems and in assisting responsible officials toward remedies for them."[111] The reports were defended by administrative officials as "providing helpful information . . . for later writing of recommendations and other evaluative statements."[112]

Although officials maintained that they never showed reports to non-University personnel, they allegedly admitted to digesting general comments from the reports.[113]

Admittedly, the situation just described represents one view. As such, the details are subject to inaccuracies. However, other sources do corroborate the process as described and the discontentment associated with it. A Special Study Committee for the Office of Student Affairs, appointed by the Vice President for Student Affairs in the summer of 1961, stated that "since student dissatisfactions (often shared by faculty members and administrators) relate principally to housing, counseling, and rules of conduct and discipline, the Committee singled out these areas for special study."[114]

A part of the problem was attributed to the unclear or imprecise

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[111] Ibid., p. 1.

[112] Ibid.

[113] Ibid., p. 3.

[114] Special Study Committee for the Office of Student Affairs, "Report of the Special Study Committee for the Office of Student Affairs," Office of Student Affairs, The University of Michigan, February, 1962, p. 3.

views and policies on the part of University officials with regard to the social values governing the non-academic affairs of student life. Lacking a strong statement of purpose and commitment, the University was less than consistent in its practices. The Special Study Committee made this point quite clear: "To the extent that the University's nonacademic actions are not in harmony with its academic purposes, it is in real danger of developing institutional schizophrenia."[115]

In its February, 1962, report, the Special Study Committee recommended the establishment of liaison with all counseling agencies on campus to facilitate exchange of information and coordination of operations. The Vice President responded by setting up the University Committee on Student Counseling Services and by creating a new staff position to work with the Committee and to coordinate counseling services. The new Committee had its first meeting on October 8, 1962.

The activities of this Committee provide additional insight into the attitudes toward individual rights that existed during the period 1962-66. Minutes of the very first meeting spoke to the matter of records and called for an awareness of the civil liberties "push."[116]

The April 16, 1963, minutes suggest that residence halls reports were still a major concern:

> The confidential reports addressed to academic deans for men's residence halls were introduced to the Committee. These reports, prepared in duplicate, are made on every student known to be in academic difficulty and for all students at the conclusion of their first year in the quadrangles. These reports are written by the Staff Counselor on a man's corridor, reviewed by the Resident Adviser of each house, and read by the Director of each quadrangle to the extent that each Staff Counselor's work is reviewed.[117]

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[115] Ibid., p. 7.

[116] The University Committee on Student Counseling Services, Office of Student Affairs, The University of Michigan, Minutes of October 8, 1962, p. 3.

[117] Ibid., April 16, 1963, p. 1.

Confidential reports on women differed in form and administration from those on men. They were written by resident counselors and older students, reviewed by the House Director, and submitted to the Dean of Women. "Upon request an academic dean's office could receive a copy of the report on a specific girl within twenty-four hours from the Dean of Women's Office."[118]

Comments relating to the use of reports by schools and colleges tended to dwell upon the advantages of the system rather than the possible dangers to individual rights:

> The schools and colleges which receive these reports make use of them to varying extents. The academic offices represented on the Committee agreed that they serve a useful and important function in the formulation of an understanding of the individual student's difficulties. In one college the assistant dean in charge of academic counselors reads every report making notations on the college's file card on an individual student when particularly significant material is on the report.[119]

Although questions were raised as to the accuracy and proper use of the reports and concern was voiced over open-ended questions that called for subjective judgments, the fundamental issues seemed to escape attention. It was suggested at one meeting that students be made aware that reports were being written. One of the possibilities proposed was that the student be given the opportunity to read his report "thus making him more aware of his weaknesses."[120] The effort was in the right direction, but for the wrong reasons.

A new thrust into the use of information began in May of 1963 when the University Committee on Student Counseling Services set up the

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[118] Ibid., p. 2.

[119] Ibid.

[120] Ibid., p. 3.

Sub-Committee on Student Records and Their Use. At this point, deliberations shifted from isolated issues such as residence reports to general concern about the use of student information.

The Sub-Committee had but one objective: "To formulate a policy statement on student records and the use of same."[121] To gather relevant data, a questionnaire was developed and circulated among approximately 130 University agencies in the spring and summer of 1963. The responses to this survey were summarized in a ten page "Preliminary Draft" presented to the University Committee on Student Counseling Services on December 9, 1963.[122]

The report noted a complete absence of written policies covering the use of student records and an overwhelming response of either permanently or indefinitely to the question of what period of time records were kept. In regards to the handling and release of information, the prevailing practice dictated that information be transmitted to outsiders by someone on the school or college staff. At least two units specified that the Federal Bureau of Investigation and Army and Navy Intelligence could view their records.

The preliminary draft was followed by another document from the Sub-Committee, "Recommendations for Use of Student Records."[123] This set of recommendations, discussed at the University Committee on Student Counseling Services meeting of May 4, 1964, was viewed as a starting point on policy. Among the recommendations, the following items were listed as matters of public information and could be released upon request to anyone:

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[121] Ibid., May 14, 1963, p. 2.

[122] Ibid., December 9, 1963, p. 1; a copy of the survey instrument and the "Preliminary Draft" are in Appendix A.

[123] See Appendix B

name, local address, local phone, home address, home phone, class, school, sex, marital status, employment history, university recognized activities, military and Selective Service record, United States citizenship, and majority.

Other sections of the recommendations still acknowledged the need for photographs and the use of signatures which could be released to "proper law enforcement agencies." Not included under the general heading, but nevertheless classified as public information, were court records and information pertaining to confinement in Health Service Infirmary and University judiciary decisions if such decisions became a part of the student's transcript.

Members of the Committee questioned several aspects of the recommendations, including the criteria for deciding on public and non-public information. The meeting ended with a request by the Chairman of the Sub-Committee that the report be discussed during the summer in each area of representation on the Committee and that suggestions or comments be sent to the Sub-Committee by the fall of 1964. As of November 19, 1964, no communications had been received concerning the recommendations.[124]

On the following May 24 (1965), the Sub-Committee was informed that the staff of the Office of Student Affairs had discussed the recommendations on the use of student records and that that office "could work under the recommendations only if a philosophy and policy were a part of the recommendations."[125] The Office of Student Affairs had

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[124]Sub-Committee on Student Records and Their Use, "Summary Statement," The University Committee on Student Counseling Services, Office of Student Affairs, The University of Michigan, November 19, 1964, p. 1.

[125]Personal File No. 2, Memorandum, Coordinator of Counseling Services to the University Committee on Student Counseling Services' Sub-Committee on Student Records and Their Use, May 24, 1965.

worked out such a rationale and statement of principle.[126] The framework for such a statement was provided by four source documents: "Summary of Legal Considerations," prepared by the University attorney; "Student Records and Their Use, A Working Paper," prepared by a staff member of the Office of Student Affairs; "Records, Points of Agreement"; and "University Committee on Student Counseling Services."[127]

In view of events to come, the two most critical—yet paradoxical—declarations in the Office of Student Affairs document had to do with planning. In fact, the introductory remarks were almost prophetic: "In an attempt to eliminate the need for making decisions in times of crises, an effort to state our position in regards to these matters appears well-advised."[128] Immediately following these remarks was the section on release of information. In this section was a "policy" statement that unknowingly would serve as a precedent for a momentous decision at a point in the very near future: "No outside person or agency will have physical access to a student's record except by an order from the courts."[129]

The HUAC Decision

One afternoon in the latter part of July, 1966, an unpretentious looking gentleman strolled into the office of the Vice President for Student Affairs and identified himself as an investigator for the House Un-American Activities Committee. He was seeking information concerning a number of student organizations. The Vice President did not feel that the information in question should be released, so he turned down the

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[126] See Appendix C.

[127] Personal File No. 2, loc. cit.

[128] Appendix C, op. cit., p. 1.

[129] Ibid.

request and the investigator departed.[130]

Two weeks later, on August 4, the investigator returned to the Office of Student Affairs and asked what records of student organizations were maintained by the University. "He was told that the University kept partial lists of members, but released, on request, only the name of an organization's president. The investigator asked to see the lists, and was told that he could not."[131] At this, the investigator produced a subpoena.[132]

The subpoena was addressed to the "Director, Student Organizations and Activities, University of Michigan." The individual who filled this position happened to be absent from the office at the time the subpoena was served and the investigator was referred to the Vice President for Student Affairs who was on his way to a meeting with the President of the University. The investigator was asked if he could wait and he agreed to do so. Upon his return to the office, the Vice President for Student Affairs accepted the subpoena.[133]

The document asked that the person named provide the House Un-American Activities Committee, at 10:00 A. M., August 16, 1966, with "copies of certificates or statements, of membership, filed with the University of Michigan, for the purpose of obtaining status as an accredited campus organization" by eight named organizations.[134] Only three of

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[130]Personal interview with the former Vice President for Student Affairs, July 24, 1970.

[131]Ad Hoc Committee on the Disclosure Question, "The Disclosure Question," Senate Advisory Committee on University Affairs, The University of Michigan, October 12, 1966, p. 2.

[132]See Appendix D

[133]Ad Hoc Committee on the Disclosure Question, loc. cit.

[134]Appendix D, loc. cit.

the eight groups had membership lists on file with the University. These were: the DuBois Club, VOICE, and the Committee to Aid the Vietnamese.

On August 5, after consulting with the Director of Student Organizations, the Vice President for Student Affairs telephoned the Vice President for Academic Affairs and informed him of the subpoena.

On the following day, the vice presidents of the University gathered for their weekly breakfast conference, but the question of the subpoena did not arise.[135] That afternoon, the Executive Vice President was notified and a special meeting was scheduled for Wednesday, August 9. Attending the meeting were the Executive Vice President, the Vice President for Academic Affairs, the Vice President for Student Affairs, the Vice President for Business and Finance, the Assistant to the Vice President for University Relations, and a faculty member from the Law School who had been invited to present the general constitutional and legal background.

The vice presidents agreed that challenging the subpoena would require approval from the Regents. They also agreed to seek such approval if the lists were indeed confidential. The Vice President for Student Affairs assumed responsibility for locating the appropriate policy statement on confidentiality.[136]

Participants left the meeting with the feeling that the University would and could resist the subpoena to some degree. In retrospect, "the question of potential threats to the University's autonomy, to its basic freedoms of opinion and discussion, or to the civil liberties of individuals did not arise. Nor was there discussion of consultation with constituted

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[135] Ad Hoc Committee on the Disclosure Question, op. cit., p. 3.

[136] Ibid., p. 4.

faculty or student groups, or with outside legal counsel."[137]

It was August 11 before the vice presidents met again. This was to be the meeting at which the Vice President for Student Affairs would present the policy statement on confidentiality; but to the surprise of all, the Vice President and his assistant had been unable to find a printed authority covering confidentiality. This predicament was subsequently explained in the following manner:

> (A committee of Office of Student Affairs staff members proposed, in May of 1966, a general policy which apparently would have made membership lists public, but this policy had not been officially adopted by that office. Student Government Council revised its recognition procedures in 1965 to make such lists confidential for the use only of the Student Government Council President; these revisions are still in galley proof, and have never been published or employed as operating procedures. The 1961 edition of the Regulations, believed by most officers to be the applicable rules, has been out of print for several months and is not generally available or consulted.)[138]

These comments lay bare the confusion and non-direction that surrounded the use of information within the University. Considering the circumstances (the pressure of time and the confused state of affairs), the direction of the final decision seemed inevitable: "Those present at Thursday's meeting concluded that they had no alternative but to comply with the subpoena."[139] However, the decision was not necessarily one of unanimous consent.

Thus, on Thursday, August 11, the membership lists for the DuBois Club, VOICE, and the Committee to Aid the Vietnamese were photocopied

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[137] Ibid.

[138] Ibid., p. 5.

[139] Ibid., p. 6. Those present at the meeting were the Executive Vice President, the Vice President for Student Affairs, the Vice President for Business and Finance, the Vice President for Research, the Assistant to the President, Assistant to the Vice President for University Relations, Assistant to the Vice President for Student Affairs, and the Director of Student Organizations.

and mailed to Washington along with a "Statement of Sponsorship" for the DuBois Club signed by thirteen faculty members. The lists contained a total of sixty-eight distinct names: fifty-one students, fourteen faculty, and three non-students. However, some names appeared on more than one list.[140]

Efforts to draft a letter to persons on the lists began immediately, but the notifications did not get into the mail until August 15, four days after the lists had been sent and one day before the hearings were to begin.

Events Following the HUAC Decision

Reaction to the decision was swift and caustic. Within twenty-four hours after the notifications, four VOICE members had arrived at the Administration Building to seek answers to newly created doubts and fears. Through insistence and/or the referral system, this group eventually found themselves in the presence of the Vice President for Academic Affairs and the Vice President for Student Affairs.[141]

One of the issues to arise during the meeting was whether or not there was an agreement to consult the Regents on a statement concerning the House Un-American Activities Committee. The students believed there was, and the vice presidents believed there was not, such an agreement. The only outcome of the meeting seemed to be a commitment on part of the two vice presidents to write a statement describing what had taken place the past two weeks.[142]

Students were not the only ones to initiate action. A number of

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[140] Ibid.

[141] Ibid., p. 7.

[142] Ibid.

faculty members got involved in discussions with the vice presidents. They, too, insisted upon a public statement.

On August 17, VOICE members made a second attempt to confer with the two vice presidents. Not being successful this time, one of the members telephoned the Vice President for Academic Affair's house and informed him that there would be a sit-in at his office the next morning at approximately 10:00 a.m. The caller also announced that representatives of the press and television would be present.[143]

The next morning, while students were sitting-in, the two vice presidents were putting finishing touches on the agreed upon, public statement. By 2:00 p.m. of the same day, the statement had been released as a "Report to the University Community" and had been distributed to those persons occupying the Vice President's office. In concise terms, the "Report" declared the membership lists disclosure documents, affirmed the power of the subpoena, and expressed regret that the persons whose names were on the membership lists were not notified prior to the time the lists were sent.[144] Needless-to-say, the explanations in the statement did not satisfy the concerns of those affected by the decision. The approximately fifty participants at the sit-in still insisted upon a personal interview.

Later in the day, the Vice President for Academic Affairs and the Vice President for Student Affairs arrived at the Administration Building and engaged in a four and one-half hour, frequently heated, discussion

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[143] Ibid., p. 8.

[144] "Report to the University Community," a statement prepared by the Vice President for Academic Affairs and the Vice President for Student Affairs on August 18, 1966.

with the awaiting group.[145]

According to one record of the confrontation, the most meaningful interchanges seemed to take place near the beginning of the session, and, from that point on, the quality of the dialogue plummeted downward.[146] Some of the more basic questions raised and the answers provided by one of the vice presidents are as follows:

> Q: Why were we not notified before our names were sent to HUAC?
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> A: I confess to an error there. We should have notified you beforehand. The only excuse I can give is that we were under the pressure of time. HUAC wanted your home addresses and it took considerable time to locate them. In fact we had to send in the lists without the addresses of three of you.
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> Q: Why were normal channels of procedure not followed? Why were the Regents not notified? Why were we not given a voice in the University's decision?
>
> A: Whatever we think of HUAC we must comply with lawful subpoenas according to normal operating procedure. Any departure from that established practice would have received the Regents' attention. I can't say why you were not consulted.
>
> Q: Why can't you say?
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> A: I can't say that either.
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> . . . . . .
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> Q: What considerations went into your decision to release the lists?
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> A: We had to weigh the 65 people against the University as a whole. I believe in you students. You know I'm on your side. But I also have a commitment to excellence of this University. There is another group on the other side of the war issue just as vehement as you and just as convinced that this is a just Holy War. I want to protect the financial status of this University. I want to protect the high salaries of the faculty. I wanted to protect these things and protect you, too, from the actions that might have occurred to the detriment of us all if I had not honored a lawful subpoena.

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[145] Ad Hoc Committee on the Disclosure Question, op. cit., p. 8.

[146] Lawrence D. Hochman, "Dialogue at a Sit-In," The Realist (February, 1967), pp. 28-29.

Q: You protect us by stooling on us?

A: In a sense, yes. It's a tactic.[147]

Reactions to the decision were also received through the mail. For the purpose of this study, three types of correspondence are of particular interest: those from students whose names were on the lists; those from faculty whose names were on the lists; and those from groups concerned with civil liberties.

A good example of the harm that can come from releasing information without the knowledge and consent of the person involved is disclosed in an October 11, 1966 letter from a student to one of the vice presidents at the University. Upon returning home from his summer vacation, this student found the official notification from the University stating that his name had been submitted to HUAC. The irony—better yet, tragedy—of the situation is revealed in the following lines from the letter:

> I know you are very busy but I would like to ask a favor of you. Enclosed is a copy of a letter which I received from . . . . The letter came just after we left for our vacation out West so I did not receive it until September 1 when we got back. I immediately wrote to . . . and told him that a serious error had been made. I have never publicly, or privately objected to our country's policy in Viet Nam and in fact, I support it. I was therefore, shocked to learn that my name had been submitted to the House Un-American Activities Committee as a member (or worse yet, as an officer). . . .
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> I told . . . that a few years ago I learned by rather indirect means that there was another [student with my name] in Ann Arbor. According to the 1965 Ann Arbor phone book his middle initial is W. (whereas mine is A.). . . . It seems possible that he is the one who belongs to one of these organizations and that somehow or other my name was confused with his. . . .[148]

Another unfortunate consequence arising from the HUAC decision came to the surface in correspondence from two of the faculty advisers

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[147] Ibid., p. 28.

[148] Personal File No. 3.

whose names were submitted with the membership lists. The first one set the stage by declaring "I feel betrayed by the administration of the University of Michigan."[149] He then proceeded to make a vital point:

> It is ironic that, as the University administration well knows, the chapter of the W.E.B. DuBois Club which was organized at this University was done so by students and faculty who, for the most part, seriously disagreed with DuBois Club policies but formed the chapter specifically to defend the rights of others when they were under attack.[150]

In the same vein, the second faculty member asserted:

> Finally, I want to call to your attention the fact that nearly all the faculty members involved in the subpoena had signed a statement of co-sponsorship of the W.E.B. DuBois Club, not in agreement with the views of that organization, but in an effort to protect and foster the right of their students freely to associate and to investigate ideas.[151]

Other faculty members whose names were associated with the membership lists expressed their feelings more straightforwardly:

> I am prepared to accept the personal consequences of these investigations. I am not, however, prepared to accept the meek submission of University officials to the demands of the House Committee nor their spurious arguments in defense of this capitulation.
>
> . . . . . .
>
> The submission of membership lists to HUAC is made even more reprehensible by the existence of legal alternatives which the University could have pursued. . . .[152]

The third type of correspondence is best represented by letters received from the local, state, and national offices of the American Civil Liberties Union. At the local level, the Ann Arbor-Washtenaw County Branch expressed "distress" over the University's compliance with the subpoena. To them, "the University had displayed considerable courage

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[149] Personal File No. 4

[150] Ibid.

[151] Personal File No. 5

[152] Personal File No. 6

in the past several years in defending the rights of its students . . . ."; but, "in the face of a more formidable opponent it has capitulated."[153]

The American Civil Liberties Union of Michigan used much more force in the wording of its message to the President of the University. From their point of view, the disclosure of the membership lists was a "deplorable" act. In their mind, there seemed to be little doubt as to who was at fault:

> That it appears that the response to the subpoena was casual and perfunctory and without adequate consideration of the serious legal and policy implications involved exacerbates the wrong.[154]

A much more elaborate and detailed presentation was mailed from the national office to the President on November 2, 1966. Although signed by the Executive Director of the American Civil Liberties Union, the letter reportedly was drafted by members of the local branch.[155]

The national office called attention to what it considered to be "one of the most serious breaches of academic freedom of students in recent decades, not excluding the McCarthy era."[156] The statement referred to the involvements of both The University of Michigan and the University of California at Berkeley and called upon the President of the University, in the exercise of his position of responsibility and authority, to (1) resist subpoenas seeking membership lists, (2) to organize student-faculty committees to set specific standards of confidentiality regarding student and faculty information, (3) to issue a public statement expressing concern

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[153]Personal File No. 7

[154]Personal File No. 8

[155]This information was verified by an active member of the American Civil Liberties Union in a personal interview conducted in July, 1970.

[156]Personal File No. 9

over threats to academic freedom as a consequence of the subpoena and declaring determination to refuse to comply with other subpoenas of the same kind, and (4) to safeguard the tradition of free inquiry and debate and to resist all attempts to curb dissent at his institution.[157]

Reverberations were felt throughout the academic community. On August 31, 1966, the Faculty Senate Advisory Committee on University Affairs authorized the Ad Hoc Committee on the Disclosure Question and gave it the following charge:

> To examine the University response to the recent HUAC subpoena; to examine the University policy and procedure in general when served with a subpoena by governmental bodies with special reference to possible infringement of the individual civil rights of members of the University community; and to make recommendations for future University policy in this area.[158]

By September 19, the Committee had interviewed three administrative officers, three faculty members whose names were among those transmitted with the membership lists, three members of student groups named in the subpoena, and three faculty members speaking as officers of the Ann Arbor-Washtenaw County Chapter of the American Civil Liberties Union.[159]

The final report of the Ad Hoc Committee was released in October, 1966. In addition to a chronological reconstruction of events surrounding the HUAC decision and a variety of supplementary information, the report set forth eight resolutions and motions.[160] One of the items called for the establishment of a Civil Liberties Board.

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[157] Ibid.

[158] Ad Hoc Committee on Disclosure Question, op. cit., p. 1.

[159] Ad Hoc Committee on Disclosure Question, "Interim Report," Senate Advisory Committee on University Affairs, The University of Michigan, September 19, 1966.

[160] Ad Hoc Committee on Disclosure Question, "The Disclosure Question," op. cit., pp. 22-24.

The Senate Assembly acted upon the proposals of the Ad Hoc Committee on October 17, 1966, and passed seven of them, including the one on the Civil Liberties Board. The eighth item was postponed for further study.[161]

The Civil Liberties Board held its first meeting on November 30, 1966, with five members and one guest present. Membership was later expanded to ten; then sixteen. The duties of the Board as interpreted by the group at the first meeting were as follows:

> (1) The investigation of current record-keeping practices throughout the University.
>
> (2) The formulation of a policy for the Faculty and the Administration to follow in answering inquiries from outside the University concerning students and faculty.
>
> (3) The formulation of policies and means for making legal assistance available to students and faculty in matters pertaining to their civil liberties.[162]

Organizational problems consumed much of the time of the first few meetings. There were questions concerning operational procedures, powers of the Board, confidentiality of items discussed and communications handled, and size and composition of membership.

These were not the only problems. While faculty and student members were struggling to develop better working relationships in the performance of their duties, other relationships were obviously neglected. In January of 1969, a member of the Civil Liberties Board, a black faculty member, submitted his resignation. Among his reasons for withdrawing from the group was the following declaration:

> . . . in the few meetings of the Committee which I attended, I perceive civil liberties in the university community as largely

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[161] Ibid., Addendum to Report.

[162] Civil Liberties Board, Faculty Senate, The University of Michigan, Minutes of November 30, 1966.

> a matter of a predominantly white student body and a white institution redefining and readjusting their relationships and powers, as each perceives them.[163]

The problems and incidents faced by the Board probably were not unlike those encountered by similar groups and should not overshadow the more positive activities and contributions of the group. The two most notable accomplishments of the Board relative to the management of records were the "Report on the Civil Liberties Board Survey on Current Record-Keeping Rules and Practices Pertaining to Faculty Records," adopted by the Senate in revised form on April 14, 1969, and the report, "Recommended Policies on Student Records," adopted by the Senate at its April 20, 1970, meeting.[164]

The Faculty Senate was not the only segment of the University initiating study into the problems of record-keeping. Soon after the HUAC decision, activity increased in the Office of Student Affairs. The University Committee on Student Counseling Services and its Sub-Committee on Student Records and Their Use had been disbanded in July, 1965 without any formal action on its work, but the HUAC crisis created a new awareness of and an interest in record-keeping. The result was a revival of the Committee on Student Records and Their Use and the appointment of a Special Sub-Committee on Disclosure.

The former Committee could be characterized as an "administrative committee" because it was composed mostly of administrators. The latter committee, on the other hand, was much broader in scope. Members represented the Student Government Council, the Graduate Assembly, the Student Relations Committee of the Senate Advisory Committee on University Affairs,

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[163] Personal File No. 10

[164] See Appendix E

the American Civil Liberties Union, and the Office of Student Affairs.

Deliberations of the Special Sub-Committee culminated in a document, "Draft of Policies Governing Student Records as Provisionally Approved by the Student Relations Committee."[165] This draft, a revision of the statement prepared by the Special Sub-Committee, was provisionally approved by the Student Relations Committee of the Senate Advisory Committee on University Affairs, the Graduate Assembly, the Student Government Council, and the Student Affairs Committee on Student Records and Their Use.

Summary

By the 1960's, the *in loco parentis* role of the University was beginning to weaken. The signs of change were becoming more discernible.

In terms of civil liberties and record-keeping, one of the last vestiges of the traditional structure was the well-organized system of reporting on the behavior of students in University housing.

The protection of individual rights seemed to be of minor concern in the early 1960's. In discussing past events, a former Vice President of Student Affairs recalled that collection and disclosure policies were not a priority item when he took office in 1964. Efficiency and uniformity received more attention. "Political issues" had not yet surfaced.[166]

Although various committees had been appointed and considerable time had been devoted to the issue of student records and their use, the total effort had not adequately prepared the University for the events of August, 1966.

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[165] See Appendix F

[166] Personal interview with the former Vice President for Student Affairs, July 24, 1970.

A subpoena from the Un-American Activities Committee of the United States House of Representatives, calling for membership lists of student organizations thought to oppose the war in Vietnam, was delivered to the Office of Student Affairs on August 4, 1966. The shock was immediate, but the impact was yet to come.

Following receipt of the subpoena, a series of closed, top-level meetings was held. The administrative group's first inclination was to ask the Regents to challenge the subpoena, but due to the lack of specific, printed policies regarding confidentiality and the disclosure of information, the final decision resulted in the release of the information requested.

Notifications to individuals whose names appeared on the lists submitted to the Un-American Activities Committee were not mailed until four days after the lists had been mailed and one day before the hearings were to begin.

Reactions were swift and cutting. Protests were forthcoming from individuals, groups and organizations. Among the unfortunate consequences of the decision was the fact that the unverified information had erroneously involved at least one student and had associated a number of faculty advisers with a cause they did not necessarily support.

In retrospect, one administrative member of the decision-making group admitted that the University should have run a legal test. Even with the decision, notification should have taken place earlier than it did.[167]

Upon further analysis, a number of interesting facts emerged:

1. At least two high-ranking officials involved in the HUAC decision were active members of the American Civil Liberties Union.

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[167] Ibid.

2. The American Civil Liberties Union had published a statement on membership lists in 1965. A section entitled "Student Clubs" contained the following remarks:

> A procedure for official recognition and registration of student organizations should be established by the student government. The organization applying for recognition should submit a constitution and provide information about its purposes, affiliations, officers and activities. Such information should be available to all within the college community and should be subject to publication on the campus . . . .
>
> Organizations should not be required to file a list of members, but, if number of students is a condition of chartering or financial aid, the club's officers and the faculty adviser may be required to attest to the fact of such numerically sufficient membership. The names of officers and members should not, without the consent of the individuals involved, be disclosed to any non-college person or organization or to any college persons having no direct and legitimate interest therein.[168]

Was the decision-making group aware of this position, or did they choose to disregard it?

3. Three of the individuals involved in the decision-making process were trained lawyers.

4. One high-ranking official in University Relations wrote a personal memorandum to another member of the decision-making group. In this memorandum, he recommended that the University seek outside advice from a certain, experienced group of attorneys.[169] This recommendation was not implemented.

5. One official involved in the decision reportedly admitted that no thought was given to the involvement of faculty and student bodies even though machinery for consultation existed.[170]

Within three weeks of the decision, the Faculty Senate Advisory

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[168] Academic Freedom and Civil Liberties of Students in Colleges and Universities (Chicago: American Civil Liberties Union, 1965).

[169] Personal File No. 11

[170] Personal File No. 12, p. 4.

Committee on University Affairs had authorized an ad hoc committee to examine events surrounding the subpoena and the subsequent decision. The final report of the Ad Hoc Committee on the Disclosure Question, released in October, 1966, recommended the establishment of a Civil Liberties Board. The recommendation was adopted by the Senate Assembly, and the Board held its first meeting on November 30, 1966.

While reading through the minutes of the Ann Arbor-Washtenaw County Branch of the American Civil Liberties Union, another thought occurred. The minutes did not reflect any activity in regards to University records, in spite of the attention given to the HUAC decision. An American Civil Liberties Union member provided the answer: faculty members holding ACLU membership were finding their way into the University structure and were providing leadership from within.

A closer look at the composition of the Civil Liberties Board revealed that the American Civil Liberties Union was well represented. Six of the seven non-student members of the Board in 1967-68 were ACLU members.[171] By 1968-69, the ratio had changed to nine out of twelve.

Succinctly stated, the case which has been reviewed documents the vital interests that both faculty and students have in the issues and procedures related to University governance, illustrated here in terms of the use, control and retention of records affecting individuals' constitutional and personal rights and integrity in the eyes of peers.

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[171]This information was confirmed by two University personnel who were active members of the American Civil Liberties Union during the 1967-69 period. Personal File No. 13.

CHAPTER III

THE VALUE OF RECORDS: A SYSTEMS APPROACH[172]

> We are surrounded by evidence that mankind is in transition from one era of human thought and action to another—from what might be called the "Age of Analysis" to the "Age of Synthesis."[173]

From the historical point of view, decisions regarding record values have been made at the end of the paperwork life cycle, i.e., if they were made at all. The truth of the matter is that a thorough consideration of record values has been, and still is, lacking in most institutions.

At its best, the assessment of most values has been a process of analyzing existing information. Records have not been created or programmed with the desired historical, research or legal values in mind. These values are more or less treated as by-products of an administrative operation.

It has been said that when you postpone thinking about something too long, it may not be possible to think about it adequately at all. Unfortunately, this describes the state of affairs of the management of records in institutions of higher learning today. How can an institution fulfill its informational objectives and predict the future availability of valuable data when such availability is left to chance?

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[172]Systems approach as used in this context relates to a way of thinking. The emphasis is on a conceptual framework, not process.

[173]James W. Culliton, "Age of Synthesis," Harvard Business Review, (September-October, 1962), 36.

The "postponement of decisions" regarding the availability of valuable information is not the only area of concern. There is also the problem of fragmentation. It is a widely known fact that administrative units within a university typically are highly autonomous, and that the disposition of records created or received by a unit is, for the most part, under the control of that unit. Information problems are clearly interconnected and overlapping; yet, planning and decision-making are handled as if each component was an island unto itself.

The thesis of this chapter is that universities are entering a period that will force them to seek answers to problems involving the "wholeness" of an operation and the solution to these problems will necessitate entirely new approaches. A corollary to this thesis is that decisions regarding record values will have to be shifted from the end of the information life cycle to the beginning, or input stage.

A New Direction

In 1948, the First Hoover Commission task force selected the term "record management" as part of its title. This move gave formal recognition to a growing body of knowledge and to an emerging profession within management. The second task force that followed in 1954 deviated from the established pattern and selected the term, "paperwork management, " as its focal point. "Records management" was viewed as being too restricted, mainly because of its close association with records storage and disposal. "Paperwork management," on the other hand, was used to convey the much broader responsibilities given to the second task force, namely, records creation and maintenance.

Just as "records management" and "paperwork management" were used to symbolize new directions in the administration of records,

another term is now needed to express the mood of today's technology, one that reflects the dramatic changes that have and are taking place in the computer sciences. This term might well be "information management." Whereas "records management" seems to convey images of official documents and their care, and "paperwork management" tends to describe the medium for recording data, "information management" appears to connote a way of thinking that transcends the boundaries of contemporary forms and processes.

Information management can be defined as the system of control over the life cycle of information, regardless of form, from its creation through its maintenance, and to its eventual destruction or preservation as an item of permanent value. Instead of the traditional areas of specialization within the field of records management, we might think in terms of input management, throughput management, and output management.

Advancements in computer technology will require modifications in our conceptualization of record-keeping. Instead of the familiar forms and papers that overflow our filing cabinets, we will be confronted with invisible bits of information stored in the mysterious memories of computers.

A new emphasis will be put on the creation or input phase of information. Unlike today's unplanned, uncoordinated and unpredictable use of data, more of the decisions regarding information and its life cycle will be determined prior to creation. At least five forces will make this procedure the modus operandi: the modification of conventional forms and processes, the demands for long-range planning, the needs of historians and other researchers, the concern for space and cost, and increased usuage of the systems approach.

A Different Approach

> "And now, which of these finger-posts ought I to follow, I wonder?"
>
> It was not a very difficult question to answer as there was only one road through the wood, and the two finger-posts both pointed along it. "I'll settle it," Alice said to herself, "when the road divides and they point different ways."[174]

The dilemma in records management seems to be similar to the situation faced by Alice in the above passage. Finger-posts representing various values are readily available to give direction to decision-making at the beginning of information life cycles; but, unfortunately, there is only one road through the woods. As it now stands, most decisions regarding record values are of a residual nature because the only alternatives are at the end of the road. Alice wisely admitted that her ignorance as to what was ahead precluded a decision until she became aware of the alternatives.

To provide the alternatives needed, a conceptual framework must be developed that approaches the problem from a systems point of view. A systems approach would provide not only a way of thinking about functions, but also a framework for visualizing internal and external factors as an integrated whole. More importantly, a systems approach would provide direction for decision-making at the input stage of information planning.

Figure 1 presents one way to conceptualize the interrelationships of a university as a system and to visualize the "wholeness" approach to the management of information.

The baseline of the model represents four areas to be considered

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[174]Elizabeth Steiner Maccia, An Educational Theory Model: Information Theory, Occasional Paper 63-141, Center for the Construction of Theory in Education, Columbus: Ohio State University, Bureau of Educational Research and Service, 1963. Foreword.

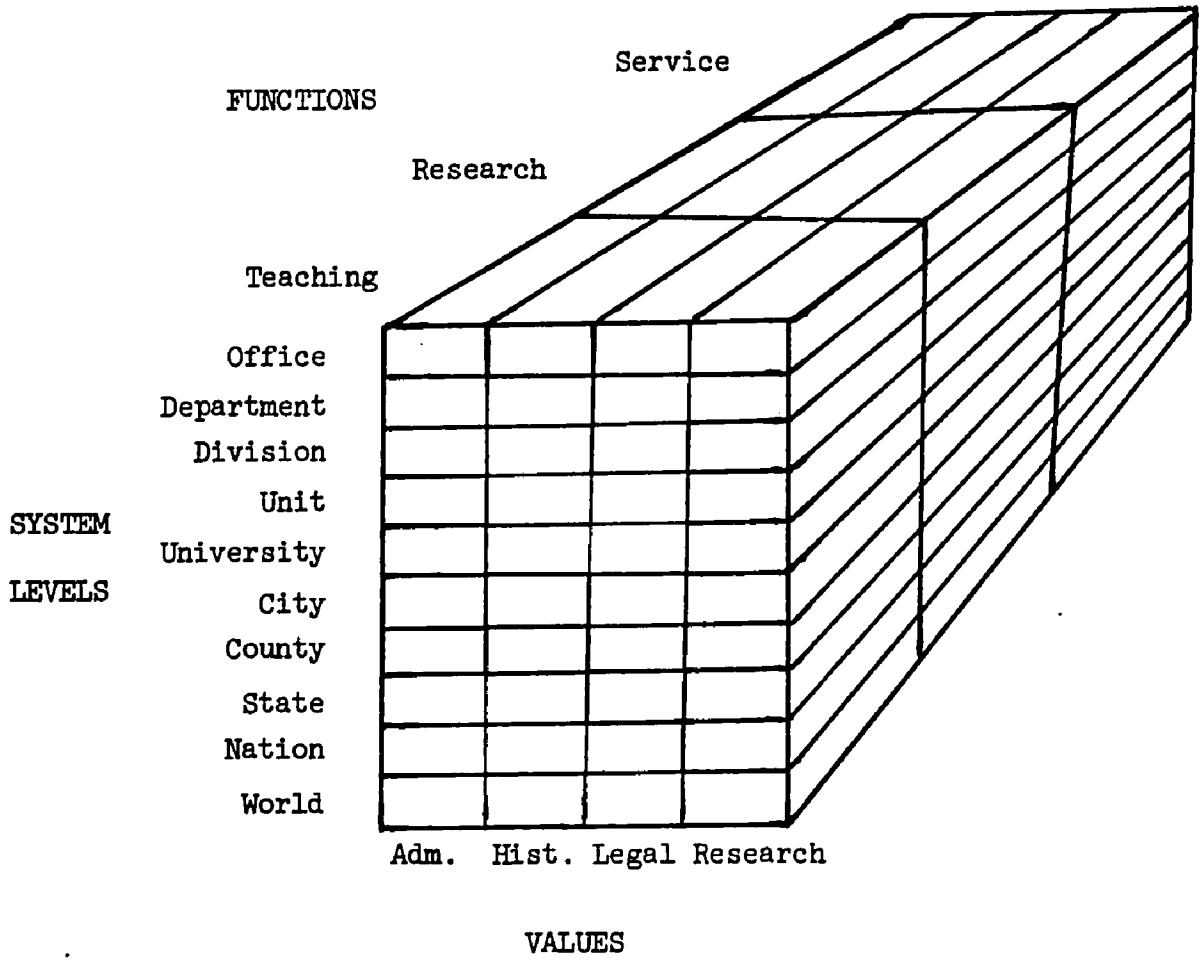


Figure 1. Model for conceptualizing interrelationships

when thinking about the value of information: Along the top of the model are listed the three major functions of a university—teaching, research and service. When programming informational inputs, careful thought must be given to the incorporation of the four value areas with each of the major functions, particularly in terms of the demands or needs for information (i.e., input factors) contained in records. In addition to considerations of value and function, a determination must be made as to what level this information may be important or relevant. Utilizing the model, one might ask the question "What data will be needed within the next ten years to research the community services performed by the various departments of the university"? A second question might be "What types of data will be needed within the next twenty years to historically reconstruct the teaching activities of departments"?

The model would not be complete without the inclusion of and attention to the time factor. Decisions concerning value must be put into a proper time perspective. This is another way of saying that carefully conceived retention periods should be established for all informational inputs. University offices have not been accustomed to establishing schedules for the orderly retention and disposal of records. One office may save everything while another retains nothing. Many offices seem to rely on the indiscriminate sifting of a new secretary to maintain spatial equilibrium.

Based on the experience of the study in the Office of Registrar, approximately sixty percent of the information created or received by a university can be destroyed within two to five years, and eighty to ninety percent of the remaining holdings should be transferred to an inactive storage area within this same period of time.

A Rationale on Values

In order to select the most important information and to establish appropriate retention periods, a rationale must be developed for intelligent evaluation and deliberate sifting. The sections that follow will attempt to provide such a perspective for each of the four value areas—administrative, historical, legal and research.

Administrative Value

Information has administrative value when it is necessary for carrying out the daily activities of the institution. How long it retains this value depends upon the purpose it serves. Some records have only short-term value; others continue their value over longer periods of time.

To be of value administratively, information must meet certain criteria. One such set of tests has been developed by William P. Southard:

> First, it must be in usable form . . . .
>
> Second, it must be useful information. Information can only do three things. It can inform, authorize, or prove. It tells you something. It tells you to do something. It tells you something has to be done. Therefore, information that is not useful to you is valueless to you . . . .
>
> Third, information must be reliable. This is a very important characteristic that few people consider. The proper evaluation of reliability rests with the question; "Is this the information needed to prove the company position?" or, "Is this the proper copy of the record on which to base any action?" . . . .
>
> Time is the fourth basis for the evaluation of Recorded Information. It is a direct, and is often the sole, basis for evaluation. For example, a check that one of you would give me today would be valuable to me only until my bank (and your bank) had cleared it. From that time on it is useless to me. But then it becomes important to you until such time as you feel the fact that you paid me the money is not important . . . .
>
> Fifth, you must have possession of the information . . . .[175]

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[175] William P. Southard, "Total Recorded Information Management," Records Management Quarterly (January, 1968), 12-13.

The key to the development of a dynamic and usable system of information management is to move beyond the limits of traditional usage and to think of information as it relates to two vital elements of the management process—planning and control. Planning has been defined as "intelligent cooperation with the inevitable,"[176] and the lack of it has been described as "becoming extinct by instinct."[177] One of management's chief responsibilities, then, is to consolidate internal and external information in a process of continual control and planning for the future, that is, committing resources to accomplish certain anticipated or inevitable tasks.

The ultimate goal of a total information management system is to keep all-levels of management informed on all developments which affect them. Reports should be geared to the level of management which receives them. They should be broad and brief when prepared for administrators located near the apex of the administrative pyramid. As the reporting descends through the organization, it should contain more data and it should be more specialized in scope.[178]

Historical Value

No area is more in danger of fragmentation than that of the historian. Not since the invention of the telephone has the work of the historian been more impaired than it is today with the advance of the computer.

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[176]F. E. Kast and Jim Rosenzweig, "Planning: Framework for an Integrated Decision System," University of Washington Business Review, (April, 1960), 39.

[177]George A. Steiner, "Does Planning Pay Off?" California Management Review (Winter, 1962), 62.

[178]James D. Gallager, Management Information Systems and the Computer (New York: American Management Association, Inc., 1961), p. 17.

For hundreds of years, the thoughts of man were transmitted primarily by way of the written word. The availability of written documents made it much easier to analyze and trace the significant events of the past. With the coming of the telephone, man found it more convenient—time and energy-wise— to conduct many of his personal and business matters orally. The increase in telephone usage led to a reduction in certain types of written communications that had been so helpful in revealing the thoughts, feelings, and peculiarities of colorful personalities.

Although telephones kept large quantities of useful information from flowing into the reservoirs of knowledge, the subsequent proliferation of record-keeping and the abundance of stored materials partly compensated for the loss. Cabinets, rooms, and buildings were overflowing with papers.

By the 1960's, advancements in computer technology were creating yet another crisis for the historian. Machines were dissipating the conventional sources of historical information and disrupting one of the basic principles of the historical profession, i.e., the principle of provenance. According to this principle, records arising in an organic transaction or activity should be kept together.[179] By preserving the original order, the historian had available for his inspection all information relating to an activity.

Unless the historian is involved in the planning of informational input, future generations may have to depend upon sterile, monotonous printouts as a primary source of information for interpreting the past.

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[179]T. R. Schellenberg, "The Principle of Provenance and Modern Records in the United States," The American Archivist, XXVIII (January, 1965), 41.

True, there still will be the papers of key individuals that can be used for biographical purposes, but it must be remembered that these papers represent only one view in the study of institutional development. The diverse pronouncements that give flavor to institutional life and the flowing memoranda that testify to institutional interactions may be locked up in the memories of those who produce them.

In the future, the information needed and the mechanisms for preserving it will have to be left to the judgment of the historian involved in the planning and to the technology at his disposal. In the meantime, Harry Elmer Barnes has provided the perspective needed for building a "wholeness" approach to the management of historical data. "Every fact of history," says Barnes, "has its relative significance with respect to: (1) its importance in the age of which it was a part; and (2) its bearing upon the genesis of contemporary culture."[180] Institutional planners cannot approach the problem of historical value with intelligence or competence without recognizing the importance of this differential appraisal of historical material.

In the first position, the problem is one of reconstruction. The relative importance of different aspects of human events is determined by the significance they possessed in their particular time perspective. For example, in attempting to reconstruct life on the university campus during the 1800's, the role of religion would probably deserve major consideration. The criterion of the importance of such activities would be the estimates placed upon them by the students, faculty, administrators, boards of control and citizens living at that time.

Looking at the second position, the task is one of tracing.

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[180]Harry Elmer Barnes, History of Historical Writing (New York: Dover Publications, Inc., 1963), p. 381.

This time, the criterion of the relative significance of different aspects of human events would be the cogency and relevance of these events to contemporary life. Religious activities might have been characteristic of university life in the 1800's, but with reference to contemporary university life, the history of student movements in the 1800's probably would be more germane.

Of the two historical approaches just outlined, the latter is considered more important because of the contributions which it can make to a better understanding of our own age.

Legal Value

The legal value of information may be either explicit or implicit. Explicit values are usually expressed in the form of laws and regulations. It has been estimated that approximately 1,000 of the federal statutes and regulations in effect today pertain to the retention of records. To this number, the countless legal requirements of states, counties, and municipalities must be added. An example of a federal requirement is the Fair Labor Standards Act which, under the Code of Federal Regulations, Title 29, stipulates a three-year minimum retention period for basic payroll records.

The implicit value of information is much more elusive and requires careful study and good judgment. Institutions of higher learning are often called upon to explain their actions regarding this or that decision. Without adequate information, the reconstruction and defense of some events would be most difficult. Conversely, the retention of too much information may involve institutions in unnecessary legal quandaries. The result is usually much discomfort for all concerned.

As indicated in the previous chapter, one thorny legal issue

involves the confidentiality of personal information. A great deal of progress has been made in this area the past few years. University units have developed endless position papers, numerous guidelines, and a few policies concerning the handling of information. As a result of these pronouncements—and a few embarrassing situations—major record-keeping offices are using more discretion in the collecting and releasing of information.

The practice of gathering non-academic information from residence halls and social activities and using it for a variety of "academic" decisions may be fading from the scene, but another variation of the same troublesome problem is rapidly spreading. Mechanical and electronic experts are diligently working to perfect mediums for gathering and disseminating vast bits of data from and to a kaleidoscope of sources and the entire process is moving at a phenomenal rate.

Our information networks can be characterized as suffering from the concurrent effects of centrifugal and centripetal forces. In the former case, universities are caught in the center of an uncontrollable force to move information outwardly. This force is evidenced by the tendency to over-duplicate and over-disseminate information. Little attention has been devoted to the perils of mass duplication and wide dissemination of information. Major offices—such as the Office of Registrar—have tightened up on the handling of information and have developed a new consciousness regarding the rights of individuals; but, the same information may have been distributed to a dozen different offices. In many instances, the employees in these offices do not share the understandings and concerns exhibited by the personnel in major offices. The uninformed secretary in the small office which lies just on the

fringe of the campus may be more than willing to share information with anyone who requests it.

In the latter case, universities have reacted with a counter force, i.e., the urge to amass data centrally. This phenomenon parallels the growth of computer storage capabilities and the development of networks of information exchanges, commonly known as data banks.

Although data banks have tremendous potentiality for improving decision-making, universities must not lose sight of the dangers involved. Arthur R. Miller, author of the timely book, Assault on Privacy,[181] warns that "unless we're very, very careful, computer technology may be used by unsensitive, unthinking people to destroy our invaluable right to privacy and other individual rights."[182]

In the final analysis, each institution must seek legal advice concerning what information it is legally required to keep, and, of equal importance, it must decide on what information it should not keep because of the potential harm to individuals and to the institution.

Research Value

All records have some research value, but it is obvious that records cannot be maintained for all purposes or for the casual interests of individuals. Some practical procedure must be established for determining what information best meets the needs of institutional research. Any progress in this direction requires a thorough understanding of a university, its sub-systems, and the super-systems of which it is a part.

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[181] Arthur R. Miller, The Assault on Privacy: Computers, Data Banks, and Dossiers (Ann Arbor: University of Michigan Press, 1971).

[182] Frank Munger, "Miller's 'Assault on Privacy': Time to Control our Computers?" The Michigan Daily, April 11, 1971, p. 9.

The university itself is a system of interrelated parts working with each other in order to accomplish a number of goals, both those of the university and those of individual participants. These goals will naturally differ according to the particular as well as general functions that the social system(s) and cultural system(s), of which the institution is a pattern and integrating unit, expect the institution to perform.

It falls upon the shoulders of the institutional research staff to provide evidence as to how well the institution performs the complex and often conflicting sets of internal and external tasks assigned to it. (See Figure 2, The Research Triangle) Using the methodological tools of his trade, the researcher must be able to analyze the past, assess the present, and project into the future. The past serves as a bench mark with which to measure the effectiveness of today's activities, and it provides a base line with which to calculate the probabilities of tomorrow's expectations.

The internal system deals with organizational structure, objectives and functional relationships. In studying this system, the traditional division of administrative units is ignored and the basic missions or components of the institution are sought.[183] The reason for separating the system into components is to provide the researcher with the kinds of information he needs to tell whether the system is operating properly. According to C. West Churchman:

> The ultimate aim of component thinking is to discover those components . . . whose measures of performance are truly related to the measure of performance of the overall system. One obvious desideratum is that as the measure of performance of a component increases (all other things being equal), so should the measure of performance of the total system.[184]

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[183] See model on page 72 which depicts the three major components: teaching, research and service.

[184] C. West Churchman, The Systems Approach (New York: Dell Publishing Co., Inc., 1968), p. 43.

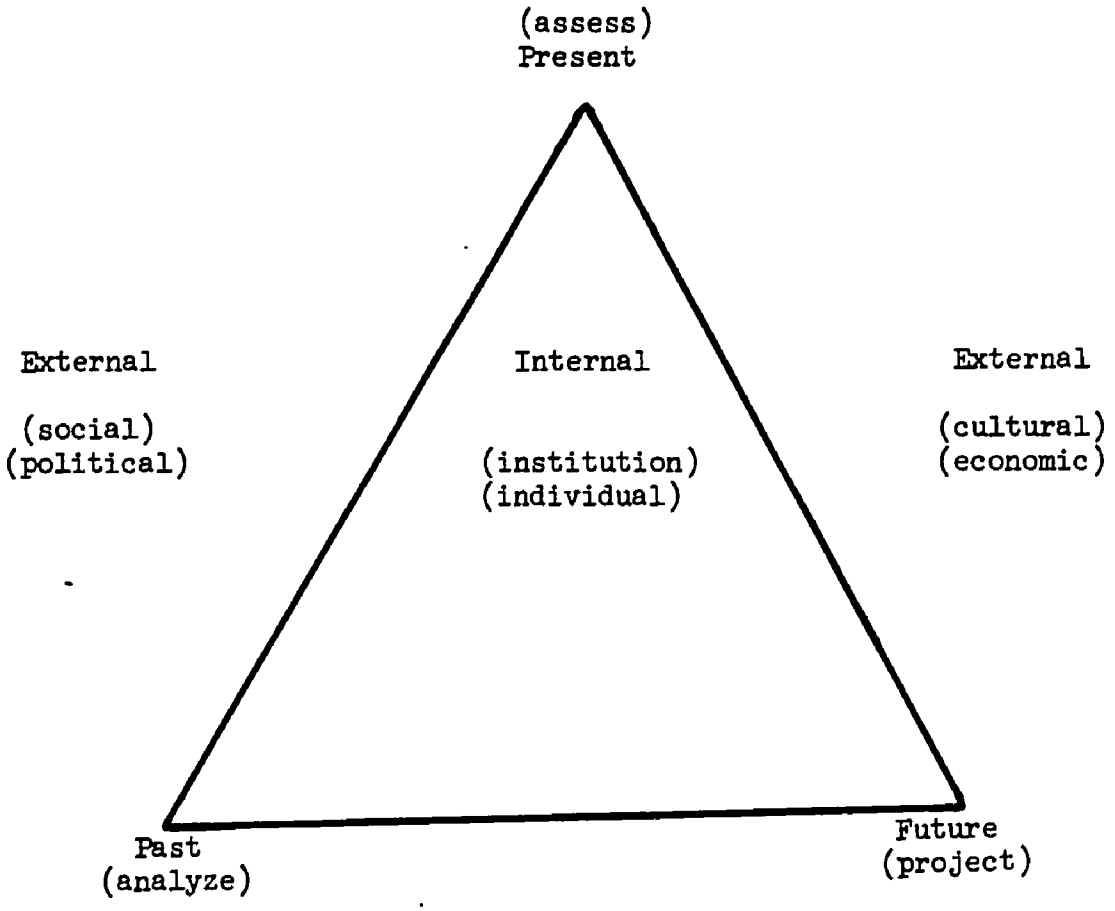


Figure 2. The research triangle

The external system sets forth the broad social, cultural, political and economic parameters in which the university operates. The wholeness approach should facilitate research in these areas by providing a store of quantitative information, a substantial data base for continuing investigation. These resources are essential to the study of processes of social change. Not only must the impact of the university upon society be measured, but also the effects of society upon the university.

A well-planned research program serves as "a kind of long-distance early-warning device, an alerting mechanism which senses social and political developments when they are just beginning to emerge . . . ."[185]

Summary

Organizational changes and advancements in computer technology require modification in our way of thinking about records. Symbolic of the new thinking is the shift from the conventional terms of records management and paperwork management to that of information management. This term represents a concept that transcends the boundaries of contemporary forms and processes.

Most records are created to facilitate the administrative operations of a university. Historically, the evaluation of values other than administrative comes at the end of the paperwork life cycle. A procedure that treats historical, legal, and research values as residuals of a highly fragmented, administrative process has the effect of subordinating these values, and it leaves to chance the future availability of needed information.

To correct this undesirable situation, universities will have

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[185]John Pfeiffer, New Look at Education (New York: The Odyssey Press, 1968), p. 109.

to adopt a systems or "wholeness" approach, and they will have to shift more of their decision-making to the beginning of informational life cycles.

In order to achieve the objectives of the new approach, a conceptual framework must be developed that provides a means of viewing internal and external variables as an integrated whole. The components to be considered in such a construct should include (1) the four basic value areas, (2) the three functions of a university, (3) the various sub-system and super-system levels, and (4) the element of time. (See Figure 1)

Finally, a comprehensive rationale for each of the value areas must be formulated to provide the proper perspective for the "wholeness" approach to decision-making.

PART II

DEVELOPMENT OF A RECORDS DISPOSITION PROGRAM

CHAPTER IV

INITIATION OF A MODEL PROGRAM

It has been said that "records are valuable evidence of human activity."[186] Even though this statement is quite explicit, the message conveyed will be conditioned by individual perspective. To some, the statement relates to historical documents earmarked for preservation. To others, it brings to mind the importance of documenting current business decisions and procedures.

A Working Definition of Records

In order to serve University-wide needs, records must be viewed from a broad perspective. Three definitions that reflect this type of perspective are listed below:

> Records may be defined as "papers, maps, exhibits, magnetic or paper tapes, photographic films and prints, and other documents produced, received, owned or used by an office, regardless of physical form or characteristic."[187]

> . . . University records will include any document, device or item, created or received, which serves to document the organization, functions, policies, decisions or other activities of the University and its faculty and staff.[188]

> It is defined by law that records ". . . shall include any paper, book, photograph, motion picture film, microfilm, sound recording, map, drawing, or other document, or any copy thereof that has been made by an agency of the state of Michigan or

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[186] Evan, op. cit., p. 53.

[187] Records Management Committee, op. cit., p. 6.

[188] Ohio State University, The Ohio State University Operations Manual (Columbus: Ohio State University, ___), p. 1.

> received by it in connection with the transaction of public business and has been retained by that agency or its successor as evidence of its activities or because of the information contained therein."[189]

An analysis of these definitions, and others like them, suggests that a definition of University records—from the records management point of view—should include:

1. The creation, receipt and use of

2. all documents, recorded materials or items, regardless of physical form or characteristic, for

3. all activities of the University.

Non-record materials might include such items as envelopes, rough drafts of letters and shorthand notes.

Ownership of Records

Records of value are occasionally lost to the University because individual employees have considered the records to be their personal property.[190] It is for this reason that a policy statement such as the one below is recommended:

> All records created, received, or otherwise in the possession of employees in the regular or occasional performance of duties are the property of the University, and as such, they may not be removed from the University or destroyed except in accordance with authorized disposition schedules and procedures.
>
> Records in this context include, but are not limited to, correspondence, minutes, policy statements, reports, writings, papers, books, maps, sound recordings, tapes, photographic films and prints, microfilm, punched cards, and discs and drums.

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[189] Western Michigan University, General Schedule for Retention and Disposal of University Records (Kalamazoo: Western Michigan University, 1968), p. 1.

[190] Records Management Committee, Records Disposition Schedules (Berkeley: University of California, 1969), p. iv.

Objectives of a Model Program

A properly organized records disposition program is designed to:

1. Save space by removing from offices those records not needed for daily operations or frequent reference; by removing from storage those records that cease to have value; and by maintaining efficient and systematic transfers of records from offices to storage to destruction.

2. Save money by avoiding the purchase of new equipment; by providing inexpensive storage; and by releasing filing equipment for reuse.[191]

3. Save time by removing inactive materials from office files making it easier to locate records; by establishing a system that identifies what records are kept, where they are kept, and how they will be processed.

4. Safeguard the interests of the University and its component parts by making sure that all legal, historical, administrative, research, fiscal and other values have been carefully considered.

5. Provide for the protection of vital records against all potential hazards, including fire, theft and civil disorders.

Components of a Model Program

The basic steps of a records disposition program can be described as follows: (1) take an inventory, (2) appraise the records, (3) set retention periods, (4) establish retention schedules, and (5) implement the schedules. (See Figure 3) The chapters that follow will describe in detail the implications of these steps in the building of a model program.

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[191]See Appendix G, "Report on Records Management Activities."

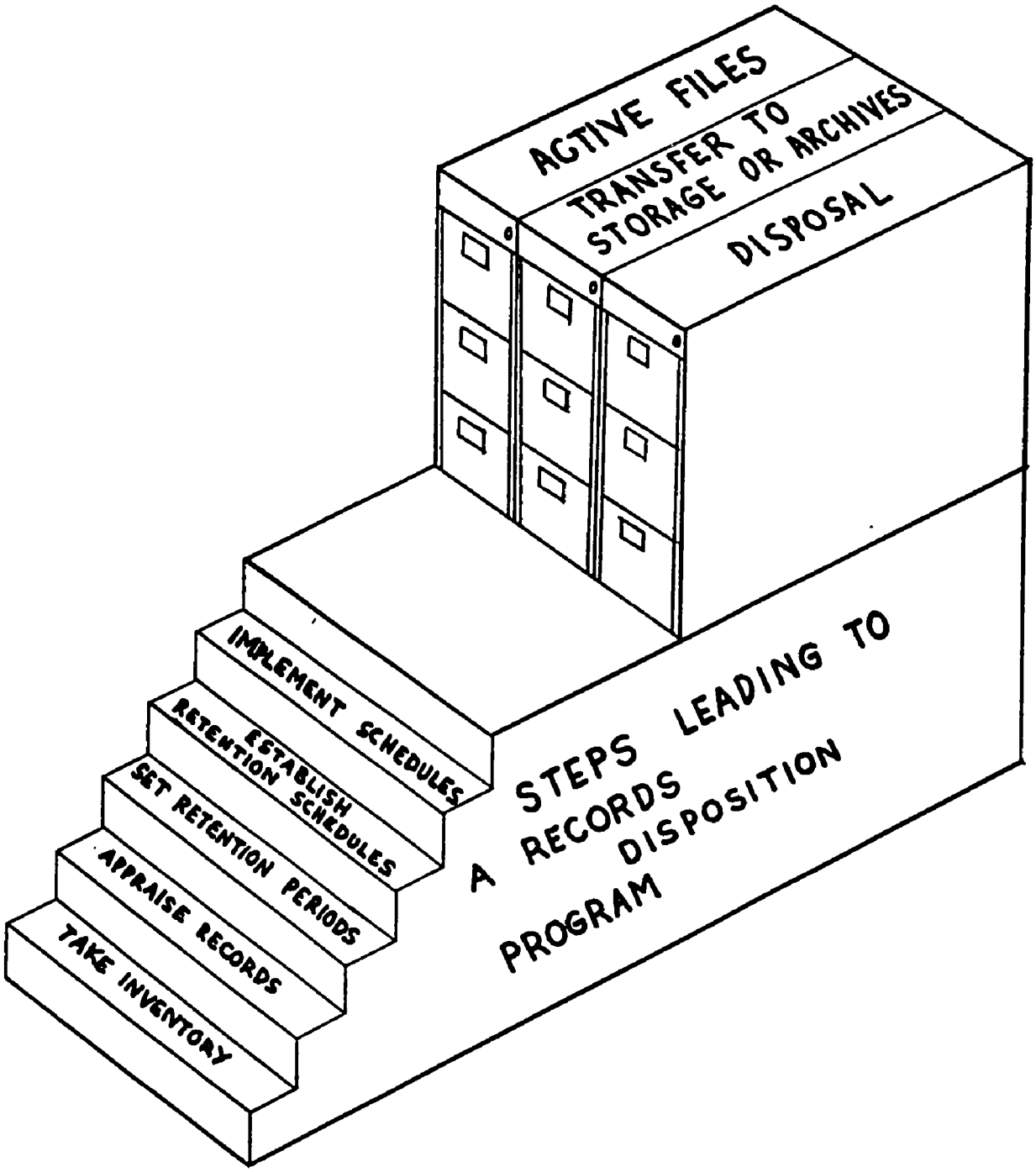


Figure 3. Steps leading to a records disposition program

CHAPTER V

THE RECORDS INVENTORY

Advantages of a Physical Inventory

The first step in the develop of a records disposition program, and the only practical means of developing a retention schedule, is to take a physical inventory of all records in an office. A records inventory can be described as "a complete listing of file contents by category together with sufficient supporting information to enable a proper evaluation of file function and activity."[192]

Advantages associated with a physical inventory are:

1. It provides the information needed to make a sound evaluation of a record.

2. It reveals what records are being retained and in what quantity.

3. It pinpoints the location of active and inactive records.

4. It discloses duplications.

5. It reveals inappropriate uses of space and equipment. A typical example is the caching of forms, supplies and personal items in filing cabinets.

6. It does not interfere with the daily operations of an office. Departmental personnel are usually not involved with the taking of an inventory.

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[192]Benedon, op. cit., p. 13.

The most notable drawbacks of this method concern the amount of time consumed and the cost of personnel involved in the inventory process.

There are alternatives to the physical inventory, including the use of questionnaires and consultants; but these methods are only short-cuts and, as such, they result in inadequate information.

Personnel Involved

Who conducts the inventory? Is it to be done by records specialists (centralized staff) or by records coordinators (decentralized staff)? The answers to these questions could be of considerable consequence to a records program. A partial answer can be given by looking at some of the factors that should be present in an effective program:

1. Skills and experience. "Records personnel should be thoroughly trained in inventory technique and appraised of the related problems."[193]

2. Innovation. Personnel already working in a situation may be bound by the familiar and may, through habit, overlook needed changes.

3. Responsibility. To a department or office, records management may be a low priority item. The records coordinator may share—at least feel the influence of—this feeling. If this is the case, he may view his role in records management as a minor responsibility and of little consequence.

4. Informed decisions. The knowledge gained through the inventory process forms the basis for the proper development of the entire records program.[194] If the specialist is not actively engaged in the inventory process, he cannot effectively contribute to the decisions made in an office or department.

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[193] Ibid., p. 15.

[194] Ibid.

5. Coordination. In order to coordinate a quality program, records personnel should have a thorough understanding of activities in other administrative units and the decisions made in those units.

Administrative Clearance

Prior to the time for the inventory an administrative memorandum should be sent to the office personnel concerned informing them of the upcoming visit, the purpose behind it, and the steps to be taken. Figure 4 is an example of such a memorandum. The opening remarks of this particular communication make reference to initial efforts in records management at the University. These remarks would need to be revised once the program is accepted. In this case, it is an attempt to coordinate simultaneous, but independent endeavors.

Orientation

The actual process of taking an inventory begins with an examination of existing conditions. The person assigned the task of taking the inventory should familiarize himself with the responsibilities and operations of the office, as well as the locations of files, and other places where records are stored. Notes should be taken indicating the types of storage equipment used and their locations. The notes—and University blueprints if they are available—can then be used to develop a floor plan. (See Figure 5)

This plan and a location scheme (Figure 6) are part of a systematic procedure that helps identify and locate records being inventoried and facilitates the removal of records later earmarked for transfer or disposal. If it is anticipated that files will be shifted or removed before records can be inventoried and appraised, an inventory number can be affixed to each storage unit and recorded on the inventory worksheet.

MEMORANDUM

Date

To:

From:

Subject: Records Disposition Program

On December 15, 1969, President Fleming established a Records Management Committee. One function of the Committee is "to recommend a practical course of action which will provide an efficient and systematic method of handling records taking into consideration their legal, fiscal, administrative and historical usefulness."

With this charge in mind, we have decided to take a close look at our record-keeping practices in the Office of Registrar to determine what can be done in the way of a "practical course of action." It is important that we keep the volume of records we generate to a minimum and retain those we need in the most economical and efficient manner. To assure proper procedure and continuing controls in this area, we propose the following steps:

1. A physical inventory of all records, both active and inactive.

2. The establishment of retention schedules to determine how long records must be retained in office areas and inactive areas, in what form, and when and if they may be destroyed.

3. The establishment of a repository for inactive records. This includes the protection of vital records.

4. The implementation of a simple filing system and the removal of unused equipment.

We request your cooperation in any planning that might be required and in making available all files for inclusion in the physical inventory. Mr. _____ will serve as Coordinator of the project. Any questions should be directed to his attention.

Figure 4. Administrative memorandum

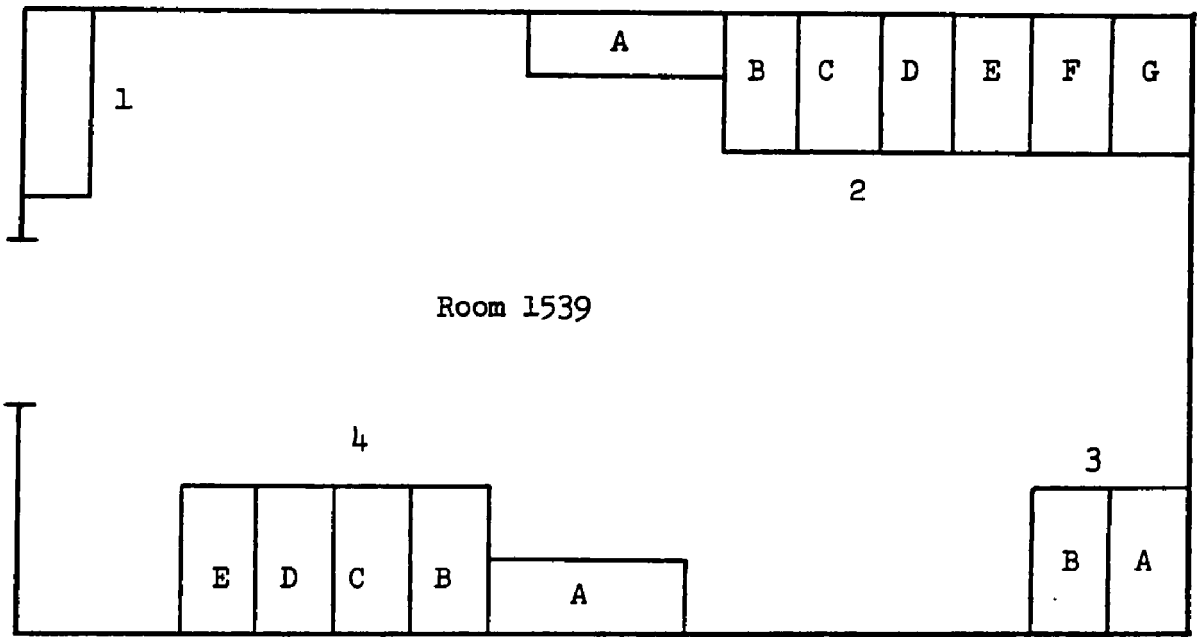


Figure 5. Floor plan

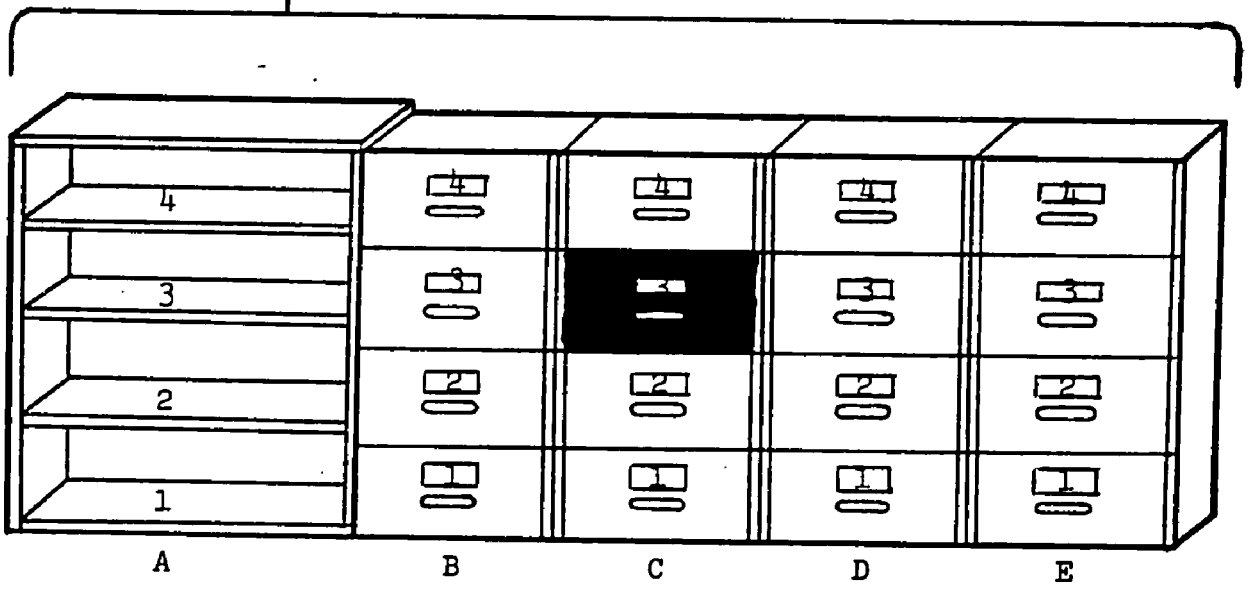


Figure 6. Location scheme

Each continuous group of files within a room is numbered from left to right beginning at the entrance and proceeding around the room in clockwise fashion. Pieces of equipment within a group are assigned letters. However, a new sequence of letters is started with each group. Finally, each drawer or shelf is identified by a number starting with the bottom and counting upwards. By numbering from the bottom up, locations are always identical, i.e., 1 is always on the bottom row.[195]

Figure 6 provides a frontal view of the equipment in area 4 of Figure 5. The equipment in this group consists of one, four-shelf, metal bookcase (A) and four, four-drawer, letter-size cabinets (B-E). For illustrative purposes, one drawer in the diagram has been darkened. A reference to materials in this drawer would read OR/1539, 4-C-3 (Office of the Registrar, Room 1539, area 4, file C, and drawer 3).

Data Collection

Once a floor plan has been developed, attention is turned to the contents of storage units. At this stage, careful consideration must be given to the kinds of information that will be needed to identify, analyze, and appraise records. Figures 8 and 9 show examples of inventory forms and indicate the kinds of information that can be collected.

Department or Office. This space is used to identify the administrative unit that has custody of the records being inventoried. The name of the department or its code number may be used.

Building and Room. This item identifies the area that is being inventoried.

Inventory Date. This should reflect the actual date records were inventoried.

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[195] Ibid., p. 22.

Records Title. In a disposition program, there is more concern with record classification than with form numbers. One reason for this is that "each group of closely related records, which are filed as a unit, and which eventually will be transferred to storage or disposed of as a unit should be listed as one item, regardless of quantity."[196]

For example, one folder may contain five or six forms in addition to correspondence, but on the retention schedule, the folder may be treated as a unit and will have one retention period assigned to it. All future references to the records will be by the record series name. For this reason, each record series needs to be clearly titled and described.

Generally speaking, the title of a record series should be the same as the one used by the department. Occasionally, there will be a need to select another title that more accurately describes the contents of a series. Under no circumstances should drawer labels be copied without checking their accuracy. They do not always state what is in a drawer.

Description. This space is used to elaborate upon or further describe the record series. Vague titles and descriptions like "Miscellaneous" and "Vital Documents" should be avoided. Concrete descriptions such as "Faculty Correspondence" or "Policy Statements" are much more helpful. Numbers or other symbols assigned to forms, punched cards and other records can be recorded in this column. Other items that might be added include filing arrangement, number of copies, and identification of record copy.

Years. This item is used to indicate the period of years covered

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[196]Olive R. Surgen and Robert E. Martin, "A Records Inventory: The Why and the How," Information and Records Management, IV (August, 1970), 15.

by the records. It does not refer to the dates the records were filed or stored.

Location. This column is reserved for the code that is used to pinpoint the location of records within a room.

Department or Faculty Head. This space is used to record the name of the individual who is responsible for the records being inventoried. This individual should have authority to take action in regard to the disposition of records.

Equipment and Cubic Feet. To be consistent in the identification of storage equipment and the amount of space utilized, a code should be developed that indicates the kinds of equipment used to house records. Figure 7 outlines a simple, yet inclusive, coding scheme.

Cut-Off Period. The cut-off period refers to the point in time when a break occurs in the filing sequence of a record series. For example the most logical break in registration records comes at the end of a term. Identification of these breaks is a prerequisite to the establishment of a microfilm schedule.

Comparison of Inventory Forms

Although the records inventory worksheets in Figures 8 and 9 record essentially the same information, they represent two different approaches to the collection of data. One worksheet (Figure 8) lists records by location in the order in which they are filed or stored. The other worksheet (Figure 9) summarizes the holdings of a single record series, regardless of location.

The first form is more practical in situations where records series are not well-defined and filing systems are such that records change titles frequently. This approach is especially helpful in inactive

INVENTORY EQUIPMENT CODE[197]

Code

L - Legal metal transfer case

l - Letter metal transfer case

L_5 - Standard 5 drawer, legal size, metal cabinet (L_4 - 4 drawer, L_3 - 3 drawer, L_2 - 2 drawer)

l_5 - Standard 5 drawer letter size, metal cabinet (l_4 - 4 drawer, l_3 - 3 drawer, l_2 - 2 drawer)

P - Package or bundles of an kind

V - Volumes (Books of Account, Tab Reports)

SS - Steel Shelving

SC - Supply Cabinets metal

S - Safe - metal

T - Tabulating Card Boxes (Standard metal or wood)

D - Desk or tub files - metal

C - Card Files - metal - C^3 - 3 x 5, C^4 - 4 x 6, C^5 - 5 x 8

W - Wooden Equipment
- lW_5 - 5 Drawer, letter size wooden cabinet
- lW - Wooden transfer case, letter size
- LW_4 - 4 Drawer, legal size wooden cabinet
- WS - Wood shelving

F - Cardboard or fibre equipment
- lF - Fibre transfer case - letter size

Examples: (In inventory, equipment is expressed in terms of drawers.)
- 3 l_5 - 3 Drawer - letter size in 5 drawer cabinet
- 10 lW_5 - 10 Letter size wooden transfer cases
- 6 CW - 6 Wooden 5" x 8" card files

Volume: 1 - 1.50 cubic feet - L - 2.00 cubic feet

Figure 7. Inventory equipment code

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[197]Benedon, op. cit., p. 19.

THE UNIVERSITY OF MICHIGAN

Records Inventory

Department Office of Registrar — Inventory Date August 28, 1970

Building and Room LS&A 1539 — Department Head

Location	Records Title	Years	Equip.	Cu.Ft.	Cut-Off	Description	Action
4-C-4	Veteran's Administration certifications	1966-67	1 4	1.5	aca yr	alpha file form no. 21E-1999	
"	Veteran's Administration correspondence	1967-70	"	"	"	alpha file	
"	Veteran's Administration school attendance forms	1968-69	"	"	"	alpha file form no. 21-674	
4-C-3	Selective Service certifications	1968	"	1.0	cal yr	filed by student no. form no. S.S. 109	
"	Class rankings	1968	"	"	term	all students, alpha	
4-C-2	Enrollment deposits	1965-66	"	1.5	cal yr	policy	
"	" "	1965	"	"	"	petitions	
"	" "	1964-65	"	"	"	procedure	
4-C-1	Residence correspondence	1956-60	"	1.5	"	alpha file by yr	
"	Office supplies	n/a	"	"	"	folders, binders and envelopes	
"	University bulletins	1958-65	"	"	"	published by school U of M	

Figure 8. Records inventory worksheet

RECORDS INVENTORY WORKSHEET [198]

Years	Range	Area	Location	Equip.	Cu.Ft.	Action
1968-70	A to Z	LS&A 1539	4-C-1	14	1.0	
1960-67	A to Z	"	6-B-2	14	1.0	
1956-59	A to Z	"	6-B-1	14	1.0	

Description: Relates to student residency and in-state fees

Off. 3.0 c.f.
Stor. c.f.
Vault c.f.

Records Title: Correspondence, residency

Department: Office of Registrar Certification Section

Figure 9. Records inventory worksheet

[198] Ibid., p. 23.

storage areas where a variety of records have been indiscriminately deposited, and being able to identify the relative position of records is important. Finally, this type of listing gives the department head a better understanding of the conditions that exist in his filing system. The primary shortcoming of this method is fragmentation of information on a single record series.

The use of a separate inventory form for each record series (Figure 9) is recommended in situations where record titles are well-defined, files are fairly well organized, and volume of each series is sufficient to prevent the frequent filling out of new worksheets, and the constant thumbing through a stack of forms to locate a record series previously inventoried. When using this form, a separate 4 x 6 form should be prepared for each of the following: supplies and blank forms, empty drawers or shelves, and miscellaneous items. The chief advantage of the single series method stems from the fact that all information regarding a record series is summarized on one form.

CHAPTER VI

ANALYSIS, APPRAISAL AND APPROVAL

After finding out what records an office has, the next step is to decide how long each record series should be kept in the office (active area) and in records centers (inactive area) before being destroyed. Also to be determined are the forms of retention (microfilm, tape, hard copy) and the types of protection against such hazards as fire and civil disorders. To accomplish these tasks, it is necessary to determine the immediate and future usefulness of the records.

Records analysis and appraisal begins at the time of inventory. First of all, the inventory does the groundwork for decision-making. Secondly, the opinions of qualified personnel in each office provide one of the best sources for learning why a record exists, how it is used and how long it is needed.[199] Some of the more pertinent questions to be asked are: Who uses the record? How is it used? When is it used? Why is it filed? How often is it referred to? What would be the loss in the event of a fire? Is the same information available elsewhere?

Based on the information gleaned from the files and the opinions expressed by office personnel, the records specialist formulates a judgment on each record series. The judgments thus formulated become the basis for recommendations to office or departmental personnel.

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[199]Surgen and Martin, loc. cit.

Setting Retention Periods

The setting of retention periods involves negotiation with those who use the records.[200] Generally speaking, the best results stem from group decisions based on a consensus model. People who participate in the decision-making process are more apt to accept the results and to enforce them.

In larger offices, administrative personnel may be somewhat removed from daily operations. Many times they are not as informed as they should be to make sound judgments concerning a record's usefulness. In these situations, personnel who work more closely with the records should be involved in the decision-making process. However, the number of persons participating normally should not exceed four or five. Where offices are highly interdependent and one office's decisions may directly affect others, observers may be invited to the meeting.

Before negotiations begin, the office group should be made aware of the fact that their decisions will be concerned primarily with the administrative usefulness of office records, and that their decisions may be reviewed by persons outside the office who are concerned with the legal, historical, fiscal and research values of records. (The importance of these values is discussed in Chapter III.)

Inventory results can be organized for analysis and appraisal in one of two ways. In the first instance, the single series inventory sheets are consolidated and used as the basis for decisions. (See Figure 9, Chapter 5) In the second instance, copies of the completed, continuous-type inventory forms are made available to group members. (See Figure 8, Chapter 5) In either case, there should be a sheet summarizing the

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[200] Records Management Committee, op. cit., p. 13.

recommendations of the records specialist. The recommendations are not to be taken as final judgments, but as starting points for negotiation. They should cover the complete cycle of retention, i.e., the active stage, the inactive stage and disposal. Related items should be grouped with the idea that they will be involved in the same discussions and will have similar retention periods.

The process of negotiation on a record series begins with a discussion of total retention time. Once this decision has been made, it is easier to agree upon a breakdown for each of the retention areas.

The records specialist acts as secretary to the group and records decisions as they are made. Some items will be easily handled, others will require some discussion. Hard negotiations should be necessary only in a small percentage of the cases. Occasionally, the records specialist will face individuals who resist the idea of deleting or transferring records. The feeling of security provided by complete, and sometimes voluminous, resources is so strong that rational decision-making may seem impossible. To settle upon a reasonable period of retention under these circumstances requires a considerable amount of skill in "the art of compromise." Priority should be given to high volume records. Concessions can be made on the low volume items.

Approval Procedure

One of the objectives established for the records program provides for the safeguarding of the University and its component parts by making sure that all legal, historical, administrative, fiscal, research and other values have been carefully considered.[201] Office personnel are probably in

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[201]Program objectives are listed on page 88.

the best position to judge the administrative usefulness of records. They may even elect to preserve some documents that help reconstruct the history of the office, or some data that will be needed for research in the office; but, in order to fulfill the intent of the objective just mentioned, the University must draw upon the services of persons knowledgeable in each of the value areas. These "specialists" would be responsible for appraising records from a "systems" perspective. For example, the Director of the Michigan Historical Collection could appraise records for historical values, the University attorney could give his opinion on legal implications, a University auditor could speak in behalf of fiscal matters, and the Director of Institutional Research could screen records for research data.

Once it has been decided how many approvals or clearances are needed and which individuals or offices will have responsibility for this task, a mechanism must be devised for securing the proper signatures. This mechanism is known as the approval procedure. The means for collecting the signatures on each record series is the Records Retention Approval form. (See Figure 10) This form is the vital link between the inventory worksheets and the retention schedules. Its significance stems from the fact that it serves four important functions:

1. It provides concise information on a particular record series that can be used by the evaluator in arriving at decisions on retention periods. In most cases, four of the items contained at the top of the form will be sufficient for decision-making purposes. These items are (1) the records title, (2) a brief description of the series, (3) the number of years on hand, and (4) the name of the office or department.

Knowing the name of the office and being familar with the nature

Records Title Correspondence, residency | File No.

Description student residency—fees Date 9-18-70

Years on Hand 1956-70 Contact Person

Office or Dept Registrar Address LS&A 1516

The University of Michigan--RECORDS RETENTION APPROVAL	Final Policy		
	Office	Center	Microfilm

APPROVALS		Orig. Office	Dept Head	Legal	Research	Fiscal	Historical
	Total Ret	10					
	Office	2					
	Center	8					
	Microfilm						
	Approved by:						

(over)

Remarks:

Cut-Off Period

calendar year X

fiscal year

term

other

File Arrangement

alphabetical by subject

chronological by

numerical by

Is this the record copy?
yes X no

Figure 10. Records retention approval form

of its operations provides a clue as to what values might be found. For example, the historian, being aware of the Office of Registrar and the nature of its operations, would probably not expect to find many documents of historical significance. This does not imply that he should be less alert. Occasionally, a valuable document can be found in the most unexpected places.

For the particularly difficult items, the records specialist can make additional comments on the back side of the approval card under "Remarks." If the information is still not adequate, the evaluator can contact the records specialist or the originating office and ask for more information.

Note: If the record series is a form, a copy of the form should be attached to the approval card. This technique will be of considerable help to the evaluators and will reduce the need for additional information.

2. It provides a record of individual approvals. The bottom section of the form contains space for each evaluator to make his recommendations and to sign his name or initials. First to be recorded are recommendations made by the originating office. These recommendations serve as benchmarks for all other decisions. If an evaluator has no particular interest in a record, he can just agree with the originating office and sign his name in the appropriate space. Agreement with the originating office is signified by a duplication of retention periods. The department head's approval is required to insure an "up the line" awareness of what is being done.[202] Approval authority can be delegated, but it should be done in writing.

Evaluators should not recommend longer retention periods unless

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[202]Benedon, op. cit., p. 41.

there is reasonable justification. To prevent the stockpiling of unnecessary data, each evaluator should have a clearly stated philosophy or a well-defined plan to guide his thinking. For example, a master design should be developed to guide "system" research, and the person recommending extended retention of a record series for this purpose should be prepared to show how the data in question fit into this design.

3. It provides data needed for constructing retention schedules. These data include the office or department, the records title, the retention periods, the cut-off period, and identification of record copies.

4. It provides a record of final action. After the approval forms have been circulated and the proper signatures have been secured, individual recommendations are summarized. The results are presented to the central authority—individual or committee—for final approval.[203] This action becomes policy and it is recorded in the section of the form entitled "Final Policy." Each form is then filed as a permanent record of official action on a record series until it is superseded.

Analysis and Appraisal of Correspondence[204]

Correspondence presents a special problem to a records disposition program. The difficulty arises not so much in determining retention periods for short-term needs as it does in determining retention periods for long-term or enduring values, particularly the historical value. Unlike forms which have specific and recurring usage, each piece of correspondence has the distinct possibility of "fitting" any point on a value

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[203] A more complete discussion on the topic of authority and control follows in Chapter IX.

[204] Correspondence in this context includes all letters, memoranda, telegrams and other communications produced or received on or off campus.

continuum because of its relationship to a function, position, person or event.

There are at least five ways to approach the analysis and appraisal of correspondence: (1) develop a general classification system that can be used by all offices; (2) develop a classification system based on function and emphasize retention of correspondence in the offices representing priority functions; (3) develop a classification system based on position or office and emphasize retention of correspondence in key positions or offices; (4) develop special schedules for certain individuals, e.g., a distinguished professor; (5) develop a system using a combination of the first four approaches.

The exclusive use of any one of the first four approaches is not recommended for an institution as complex as the University. Individuals and offices at all levels are potential producers or recipients of "valuable" papers. For this reason, a combination of the above approaches should be used to establish retention periods for correspondence. Some offices will deserve special consideration; others will work effectively with a general schedule. Figure 11 is an example of a general correspondence code that could be used by all offices not specifically covered by other schedules.

The filing and sorting of correspondence should be guided by the following principles:

1. All correspondence should be coded before it is filed.

2. Each type of correspondence should be placed in a separate folder. (See Figure 12)

3. Correspondence should be filed chronologically with the most recent materials at the front.

CORRESPONDENCE CODE

Code	Type of Correspondence	Retention Period	
		Office	Center
A	ROUTINE. This type of correspondence covers matters that could possibly have been handled over the telephone. It has no value beyond the period required for normal interchange of correspondence. (temporary value)	6 months	
B	REGULAR. This type of correspondence has greater value than routine correspondence. It requires reference beyond the normal interchange of correspondence or relates to questions or records that have retention periods over six months but less than six years. (short-term value)	2 years	4 years*
C	VALUABLE. This type of correspondence has long-term value. It requires reference for a period in excess of six years or relates to questions or records that have retention periods over six years. (long-term or enduring value)**	2 years or until superseded	8 then review*

*Correspondence in categories B and C is reviewed by the Director of the Michigan Historical Collection before being destroyed.

**Correspondence may have a long-term administrative value because it dictates policy or sheds light on how the policy was made; an enduring (historical) value because of its relation to an important person, position or event; or a long-term legal value because it relates to matters covered by law that require retention for long periods of time.

Note: Correspondence classified as "valuable" should not be attached to a record or filed with a record series of less importance. To do so may cause the correspondence to be destroyed prematurely. Conversely, routine correspondence should not be filed with records having long-term retention.

Figure 11. General correspondence code

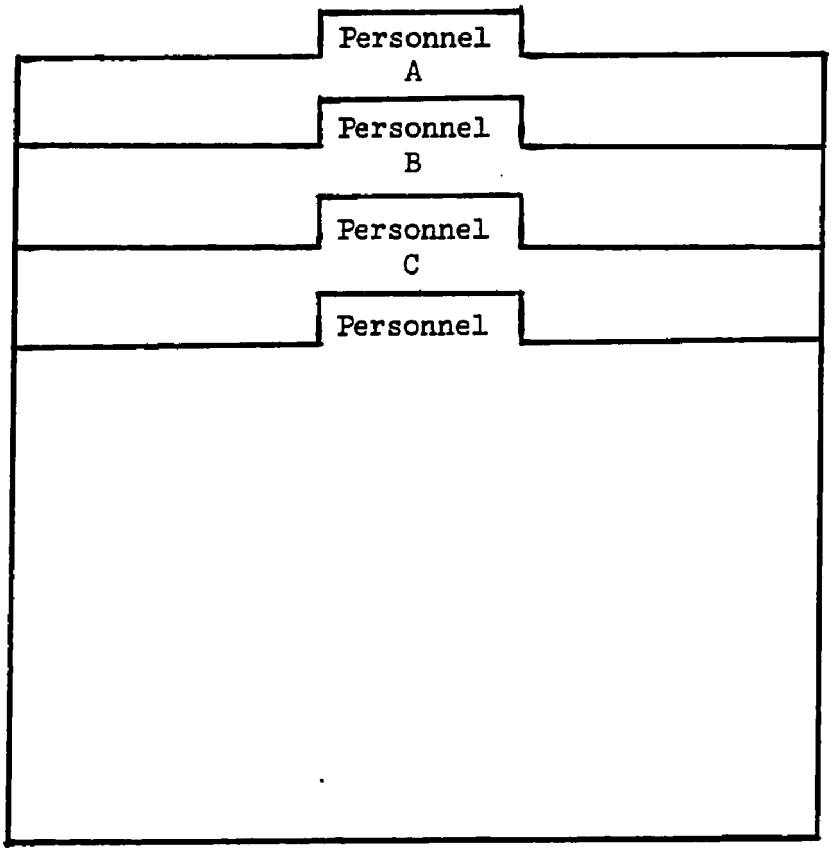


Figure 12. Filing arrangement

4. Folders should be labeled with a correspondence code and should assume the same file name or number as the subject they treat. (See Figure 12)

5. Folders containing the three types of correspondence should be filed with the subject they treat. (See Figure 12)

Implementation of these principles has the effect of "separating a directive that announces a procedure change from the background studies that preceded it and produces one folder for each subject that is a distillation of policy-level material."[205] Also, "material which should be kept for a limited time only does not clutter up folders containing more significant material, and can be easily destroyed at predetermined periods of time as part of the office records disposition program."[206]

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[205] Records Management Committee, Records Management Handbook: Correspondence Control and Records Services (Berkeley: University of California, 1965), p. 17.

[206] Ibid.

CHAPTER VII

DEVELOPMENT AND MAINTENANCE OF RETENTION SCHEDULES

A retention schedules is a listing of all record series maintained by an office or other administrative unit specifying the action to be taken on each series throughout its life cycle. It indicates the length of time a record series is kept in the office area and in records centers, and if and when the series is to be microfilmed and/or destroyed.

Types of Schedules

Retention schedules are generally of two types: general or special. A general schedule lists all records in the institution without regard to office or department. Its main purpose is to incorporate records that are common to all offices thus avoiding the need to repeat a given record series on several schedules. Special responsibility for retention is designated for offices holding the record copy, but all other copies are given optional retention periods.[207] (See Figure 13)

The special schedule on the other hand is tailored to the operations of a particular office or department. It lists all records maintained by an office—originals and copies. (See Figure 14)

The general schedule is suitable for an institution that has a limited number of record series, but it is difficult to maintain in an institution that has a multiplicity of records. Establishing a common

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[207]Benedon, op. cit., p. 45.

GENERAL RETENTION SCHEDULE

Record Type or Number	Title	Office of Record	Disposition Schedule In Years	
			Record Copy	Other Copies
	A. Student Certification			
G	Correspondence, name changes and duplicate diplomas	Registrar	1	0-1
G	Correspondence, residency	Registrar	10	0-1
G	Graduation, final lists as corrected	Registrar	P	0-10
G	Graduation: memos, schedules, and lists from recorders	Each Academic Unit	2	0-2
G	Master file: Registrationnaires Name change cards Diploma applications Fee changes Withdrawals Teaching fellows	Registrar	5-M-P	0-8
70082	Name change request form	Registrar	5	0-1
G	Teaching fellows, appointment papers	Academic Appointments	20	0-5

Figure 13. General retention schedule

RETENTION SCHEDULE

Office of Registrar

Item No.	Record Copy	Cut-Off Period	Records Series Title	Office*	Record* Center	Micro-film
1	yes	cal yr	Correspondence, name changes and duplicate diplomas	1-D		
2	yes	cal yr	Correspondence, residency	2-T	8	
3	yes	term	Graduation, final list as corrected	P	P	
4	no	term	Graduation: memos, schedules, and lists from recorders	2-D		
5	yes	cal yr	Master file: Registrationnaires Name change cards Diploma applications Fee changes Withdrawals Teaching fellows	5-M		P
6	yes	cal yr	Name change request form	5-D		
7	no	cal yr	Teaching fellows, appointment papers	2-D		

*Numerals indicate years unless otherwise indicated.
Record Copy—the official copy for retention purposes

CO = current only
D = destroy after number of terms or years indicated
M = microfilm after number of terms or years indicated. Hard copy is destroyed unless otherwise indicated.
P = permanent
R = review after number of terms or years indicated
T = transfer to designated records center after the number of terms or years indicated. T by itself suggests immediate transfer.
US = until superseded

Figure 14. Special retention schedule

retention period for copies held by more than one office tends to reduce the effectiveness of a retention schedule. For example, up to fifteen copies of one form are distributed by the Office of Registrar following each registration. Some offices receiving this form will keep it for one term, others one year, and still others for extended periods of time. Since a common retention period for copies of this form would have to include the shortest and the longest periods of usage, the office with an administrative use of only one term could accumulate one or more years of valueless forms without violating an approved schedule.

The special schedule is the most widely used of the two types. There are basically three reasons for its popularity: (1) it is a smaller document, thus more manageable, (2) it confines schedule operations to one office thus avoiding interoffice conflicts, and (3) it reflects the actual operations of an office or department.

In highly complex operations, it may be desirable to develop both general and special schedules. The Federal Government serves as an example. General schedules are used for inter-agency operations and special schedules are used for intra-agency operations.

Development of Schedules

The source of information for development of schedules is the Records Retention Approval form. After retention periods have been officially approved and final policy recorded, the forms can be sorted according to subject, administrative unit or other means of classification. The final step would be to file them in alphabetical sequence by records title. Once organized, the required data can be transferred from the forms to the retention schedules. These data include the record series title, retention periods, cut-off period and whether or not the item is the record copy.

To facilitate the handling of schedules and the identification and location of record series, each item on a schedule should be assigned an identification number. The numbers would begin with one and run consecutively throughout the schedule. The schedules themselves are identified by number in consecutive order with a letter prefix to designate administrative units.[208] For example, schedules for the Office of Registrar might read R-1 (Certification), R-2 (Records), R-3 (Registration), and R-4 (Statistical Services).[209]

Of equal importance is the development of an alphabetical index on all record series for reference purposes. A separate index can be prepared for each special schedule, but a composite should be available for the records staff, records centers staff and key offices.

Distribution of Schedules

Copies of completed schedules should be distributed to the appropriate offices and departments. When special schedules are used, offices and departments receive only those schedules relating to their operations. Complete sets are maintained by the records staff and are available to all offices for reference purposes.

Accompanying the schedules should be a set of procedures explaining each aspect of use, including the action steps and any code symbols not listed or defined on the schedules. The procedures should state that established schedules remain in force until officially approved changes have been made.

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[208] *Ibid.*, p. 51.

[209] See Appendix H, special schedules developed for the Office of Registrar.

Changes in Approved Schedules

Established schedules should be up-dated and re-issued on an annual basis to reflect additions, deletions and procedural changes. Individual changes can be initiated at any time by office personnel, the records staff or the Records Management Committee. Most of the requests for changes will originate with office personnel. Occasionally, there will be a need for the records staff or the Committee to recommend revisions. For example, the University attorney might suggest a change in the retention period of a record series as a result of new laws or legal opinions

The first type of change, additions, pertains to newly created record series that need to be placed on retention schedules and to record series that were overlooked at the time schedules were established. The medium for processing requests of this type is the Records Retention Approval form. (See page 106 of Chapter VI) Office personnel would begin the process by filling in the appropriate spaces on the form, including suggested retention periods, and by forwarding it to the records staff for the proper clearances and approvals. The records staff would, in turn, notify appropriate offices and records centers of the final action. Approved changes can be typed-in or penciled-in until new schedules are issued.

Deletions and procedural changes are handled in a different manner.[210] They are processed on the Request for Change in Retention Schedule form. (See Figure 15) The person requesting the change writes or types in the Records Title, Item No., and Schedule No. from the

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[210] Deletion is defined as the removal of a record series from a schedule with the expectation that it will no longer be used and that all copies will be destroyed. Procedural changes include all changes not specifically mentioned under additions and deletions.

The University of Michigan
REQUEST FOR CHANGE IN RETENTION SCHEDULE*

Records Title: Name change request form	Item No. 6	Schedule No. R-1
Office or Department: Office of Registrar	Address: 1514 LS&A	

Nature of Request:

Change the retention period for office use to 3-D

Requested by:	Title: Registrar	Date of Request: 10-1-70

Clearances Approved by:	Final Action:
1. (Historical)	Approved, 10-15-70
2. (Research)	
3. (Legal)	
4. (Fiscal)	Records Staff
5. (Department Head)	

*This form should be used for procedural changes and deletions of items already on approved schedules. The Records Retention Approval form should be used for additions.

Remarks:

We have found through experience that this record is not needed longer than three years.

Figure 15. Request for change in retention schedule

retention schedule; states the nature of the request; signs his name; and adds other information as called for. The completed form is then forwarded to the records staff for further action.

Not all changes to a schedule need to follow the complete procedures for obtaining clearances and approvals. The records staff should be authorized to approve deletions and procedural changes in so far as they are within the context of established policy. Even changes in retention periods affecting office use could be handled in this manner, unless the change would have an adverse affect on other stages of retention. In such a case, the records staff would seek additional clearances and approvals up to and including total Committee action.

Final action would be recorded in the designated space on the lower right hand corner of the change form. The originating office, records centers and other relevant areas would be notified promptly of the transaction via copies of the change form.

CHAPTER VIII

STORAGE AND DESTRUCTION OF RECORDS

This chapter focuses on the disposition of records that have fulfilled their operational usefulness and are ready for "semi-retirement," "retirement," or disposal.

"Semi-retirement" and "retirement" refer to records earmarked for "records center" on the retention schedules. These records are usually described as semi-active and inactive because they are no longer needed for daily operations. They merit retention because of their value as a future source of reference.

The Concept of Records Center

The cost of maintaining inactive records in expensive equipment located in busy offices is a luxury most universities cannot afford. What is needed, then, is an efficiently-run, low-cost storage area. But, in the pursuit of economy, extreme care must be taken to avoid the situation described by Benedon:

> Very often attempts at economy cause records to be kept in inaccessible and unattractive surplus areas such as garages, basements and attics. The undesirable features of these become apparent once it is necessary to obtain information from records in storage. It takes only a few unsuccessful attempts to locate records in poorly maintained areas to discourage further use or, at best, it will result in the storage of items for which requests will be very limited or nonexistent. We then have a backlog of inactive records in expensive office equipment and space with little, if any, concern over those records in storage. If changes in personnel and company operations should occur, there is then a mass of unidentifiable records in the

> storage areas. A subsequent attempt to destroy some of these records incurs costs which could have been avoided had a sound initial approach been taken to their housing.[211]

In the past, terms such as records warehouse, records storage area, and dead storage have often been associated with situations like the one just described. In an effort to overcome this association, a relatively new concept in records services has been suggested. This concept, known simply as "records center," can be defined as an area designed for the housing and servicing of semi-active and inactive records that (1) utilizes low-cost equipment, (2) makes maximum use of space, (3) provides for an orderly arrangement and control of records, (4) employs procedures which assure prompt and efficient handling of records, and (5) institutes adequate measures for the protection of records and the security of information.[212]

Types of Records Centers

Depending upon the availability of facilities, a University records disposition program can select from among three types of records centers: office or departmental centers, specialized centers, and centralized centers. A proper combination of these three types is essential in a University-wide program. A well-planned and well-coordinated system will not only save money, time, and space, but it will also provide a number of efficient and worthwhile services. These services include the transfer, retrieval, microfilming, protection, security, and duplication of records, and study areas for reference research.

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[211] Benedon, op. cit., p. 65.

[212] The conventional definition of records center speaks of one centralized records area, whereas this definition allows for a multi-center concept.

Office or Departmental Center

The most frequently used of the three types of centers is the office or departmental center. Administrative units fortunate enough to have adequate storage facilities can transfer selected records to these locations. Sometimes these facilities can be shared by two or more offices or departments depending upon use, space, and location. The chief advantages of this type of center are local control and proximity to the originating office. Its disadvantages are lack of organization, support, and the temptation to "over-save" records. Before office centers are accepted as part of the records disposition program, a set of standards should be developed and applied to their operations.

Specialized Center

Specialized centers are designed to house in one place all records having a particular value. The Michigan Historical Collection is the official repository for University records having historical value. A specialized center might also be established to house records that have administrative or institutional research value. Such centers could serve as links in a management information system.

Centralized Center

A centralized center would be a full-service, professionally staffed records facility serving University-wide needs. It would service those offices that do not have their own facilities and would house all semi-active and inactive records not specifically suited to the other types of centers.

Transfer of Records to Centers

At least once a year, the person in each office or department responsible for maintaining records would go through his particular set of retention schedules and identify those records ready for transfer to records centers. High volume records may be transferred more frequently depending upon filing arrangements and use. In any case, offices should follow a routine that assures a smooth and orderly flow of records.

Preparing Records for Transfer

All records to be sent to records centers should be packed in standard containers provided by the records staff. For example, a 15" x 12" x 10" Paige MIRACLE BOX with cover, or its equivalent, is recommended for letter-size and legal-size papers. Letter-size papers would be filed on the 12-inch side, 15 inches deep, and legal-size papers would be filed on the 15-inch side, 12 inches deep. (See Figure 16)

To retain integrity of the file, records should be packed in the same order in which they are maintained in office files. If there is a possibility of adding materials to a container at a later date (inter-filing), then space should be left to allow for the additions.

Only records having the same retention period should be placed in a container. The records staff cannot be responsible for separating records within a container when it comes time for disposal.

Transfer Procedure

After the records have been packed, a Records Transfer and Control form should be prepared by the originating office. (See Figure 17) Only one record series should be listed per form, and all records listed should have the same retention period.

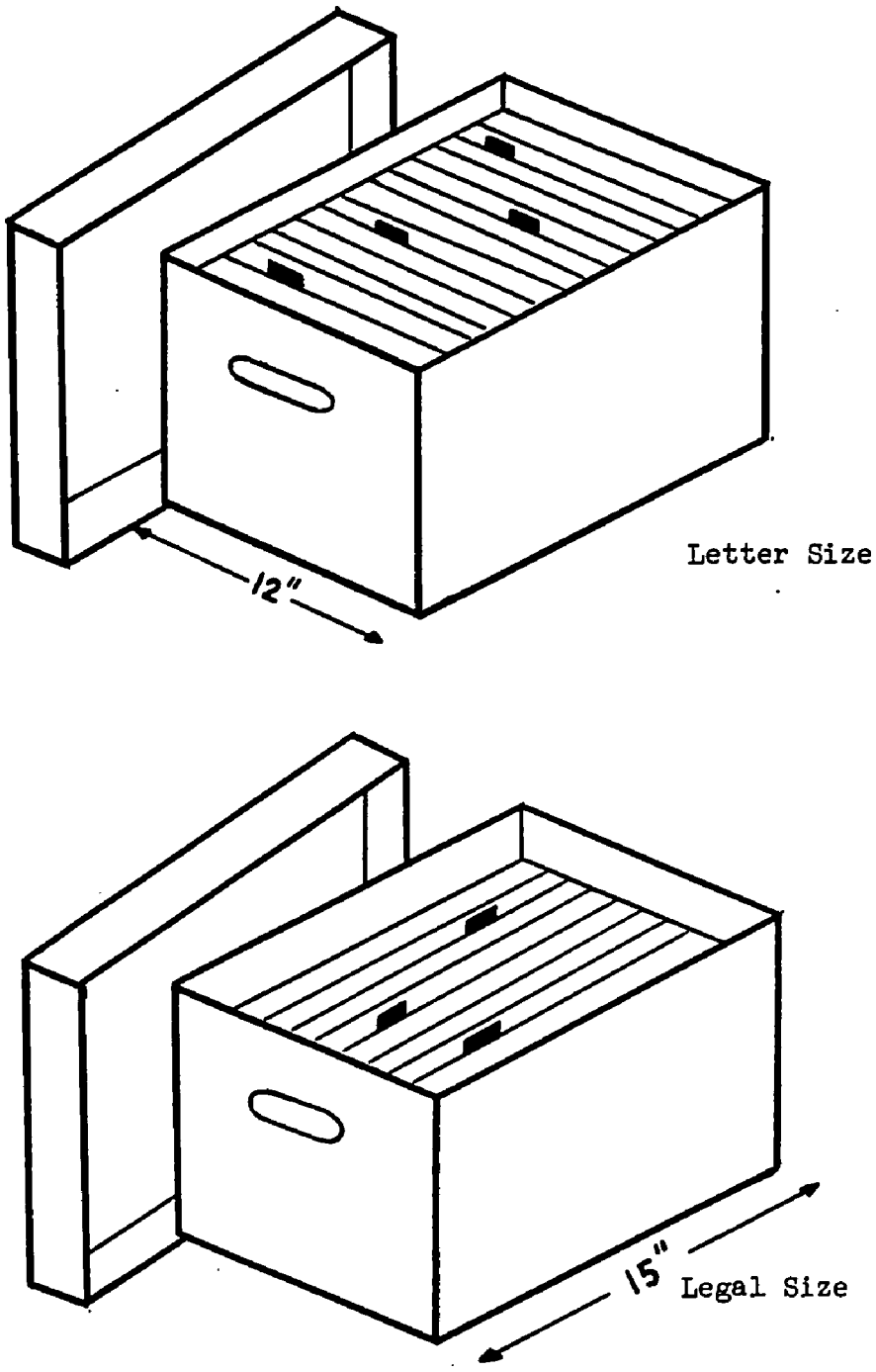


Figure 16. Standard records container

THE UNIVERSITY OF MICHIGAN

Date 11-1-70

The records described below are being transferred to the records center in accordance with the retention schedule approved for our office or department.

Office Head _____

Schedule No	Item No.	Record Title
R-3	2	Correspondence, residency

Office or Department	Address
Office of Registrar	1514 LS&A

RECORDS TRANSFER AND CONTROL

Years	Range	Confidential*		Vital Record		Center Use		
		Yes	No	Yes	No	Retention Period	Destruction Date	Storage No.
1967-68	A-G	X			X	8	11-1-78	
1967-68	H-R	X			X	8	11-1-78	
1967-68	S-Z	X			X	8	11-1-78	

*If yes, who has access to these records? List or describe here Director, Student Certifications

Figure 17. Records transfer and control form

First to be recorded is the record title, schedule number, item number, office or department, address, and date. Next comes the information called for in each line entry:[213]

Years. What period of time is covered by the records?

Range. If the records are in alphabetical or numerical sequence, what part of the sequence is covered by this container?

Confidential. If any or all of the records in a container are considered confidential, the "Yes" column should be checked and the titles of persons who will have access to the records should be listed in the designated space at the bottom of the form.

Vital Record. The "Yes" side of this item identifies records determined to be indispensable to the daily operation of the University.

One of the first responsibilities of the records authority should be the development of procedures for early identification and protection of vital records. The first step would be to identify those offices holding "key" records. The disposition program should begin with these offices. The next step would be to conduct a study to determine the number of vaults available, the amount of protection each provides, the usuable space, and the types of records appropriate for storage in these vaults. Offices that do not have the proper facilities or equipment for adequate protection of vital records should either acquire the necessary equipment or forward the records to the centralized center for safekeeping.

Following completion, the Records Transfer and Control forms are signed by the office head or other authorized person and are transmitted with the containers to the center.

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[213]Each container should be listed on a separate line.

Upon arrival at the center, the records are checked against the transfer list and against the retention schedule maintained by the center. If the check is positive, the retention (storage) period, destruction date, and storage number are recorded in the appropriate spaces by center personnel. Receipt of the shipment is recorded by using a stamp on the back side of copies one, two and five of the five-part form. (See Figure 18) The fifth copy is then returned to the originating office for its file.

Storage Control Procedure

The first copy of the form is filed by schedule and item number. It serves as the master control copy, and it is the major source of reference when working with offices and retention schedules.

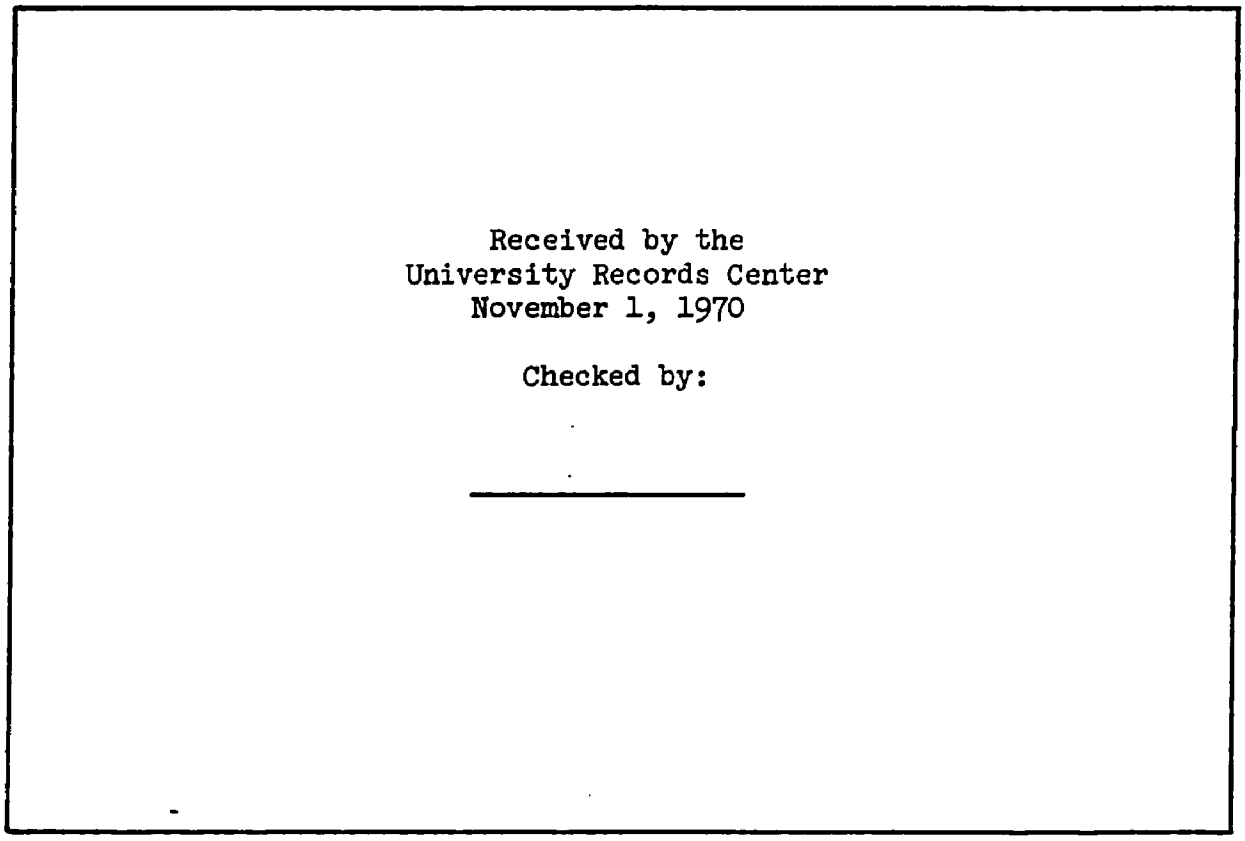
The second copy serves as the locator copy and is filed by container number or other location plan.

Copies three and four are filed by the destruction date. Together they act as a disposal file copy. This file serves as a tickler system, i.e., it is arranged in such a way as to bring the destruction dates to the attention of the records staff at the appropriate times.

Destruction Control Procedure

The reverse sides of copies three and four of the Transfer and Control form serve as a Notification and Authorization of Records to be Destroyed form. (See Figure 19) Thus, when the tickler file calls attention to the time for records to be destroyed, the reverse side of copies three and four become the means of notifying the originating office that its records are ready for disposal. It is also the means for obtaining the office head's approval and for the center's certification of disposal.

Figure 18. Receipt of shipment stamp



University Records Center

NOTIFICATION AND AUTHORIZATION OF RECORDS TO BE DESTROYED

Office Head _____ Office _____

The records listed on the reverse side of this form are scheduled for immediate disposal. Please examine the list, provide the authorization requested, and return the top copy of this form to the Center.

Date _____ Records Staff _____

Authorization

I approve disposal of the above mentioned records with the following exceptions: _____

Date _____ Office Head _____

Certification of Destruction

I hereby certify that the above mentioned records have been destroyed in the following manner _____

Date Destroyed _____ Records Staff _____

Figure 19. Notification and authorization of records to be destroyed form

Just prior to the disposal date, the form would be sent to the office head for his approval. He would keep one copy and return the other to the center. After the records have been destroyed, this one form (two sides) becomes a complete record of the transfer, storage and disposal of the records concerned. All other copies of the form can then be destroyed.

Records scheduled for disposal while in the possession of the originating office should be handled in a manner prescribed or approved by the records authority.

Three items to be considered in the disposal of records are method of disposal, security of information, and the possible cost or income. Records can be sold as waste paper or destroyed by shredding, burying, burning, or, in the case of small amounts of non-confidential materials, placed into a waste basket. The particular method must comply with local, state, and federal regulations. This is especially true in the case of burning.

Confidential records may be disposed of by any of the above methods providing certain precautionary measures are taken. For instance, when records are sold, the salvage firm should be required to obliterate the records by immediate shredding or immersion in pulp solutions.[214]

Whether or not it is advisable to sell materials depends upon volume and local market prices. Punched cards usually bring a much better price per ton than paper.

Employees should not be given permission to take used punched cards or other records without a written agreement. Letting employees remove "useless" paper may seem harmless, but it is potentially dangerous. The uncontrolled release of information could prove embarrassing to the University.

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[214]Records Management Committee, op. cit., p. 21.

Storage Facilities and Equipment

The many details that are involved in the establishment of a records center are beyond the scope of this study.[215] For our purposes we will take a brief look at some of the factors that influence the performance of a records center.

Facilities

The physical characteristics of primary concern in the planning of a records center are as follows:

Location. In selecting a records center, the same consideration should be given to location as is given to other units of the University. An area should not be selected just because it is available at the time or because it cannot be used for other purposes.[216]

The center should be located close enough to the units it serves to assure efficient handling of records. Considerations include an adequate means of communication, such as telephones and messengers.

Structure. One writer suggests that "the best construction is of steel and masonry with brick exterior and metal roof."[217] The main concern is that construction be of fire-resistant materials. The interior should consist of unpainted cinderblock walls and hard surfaced concrete floors to keep maintenance costs to a minimum.

Layout. Ideally, the layout of a center should be decided before

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[215]For a closer look at the physical characteristics of a records center, the reader should examine Benedon's chapter on the organization of a records center, op. cit., pp. 65-87.

[216]Charles T. Utt, "A Program for Records Survival," N.A.A. Bulletin (August, 1957), 1590.

[217]Mary Claire Griffin, Records Management (Boston: Allyn and Bacon, Inc., 1964), p. 162.

the building plan reaches the drafting table.[218] If existing facilities are being considered, the layout should be drawn prior to the final selection.

The full advantages of an ideal layout cannot be expected when renovated quarters are used. The shape and location of spaces, doors, windows and pillars materially affect final results.[219] (Figure 20 shows the layout that was developed for an existing facility in the Office of Registrar. This office records center, the upper vault in the Records Section, doubles as a storage area for inactive records and a security area for vital records.)

Where possible, operations should be on one floor at ground level. If this is not possible, provisions should be made for adequate elevator service. A receiving area sufficient for the loading and unloading of trucks should be located near the main stacks. Doorways and ceilings should be capable of accomodating the various kinds of records center equipment.

Floor Load. The floor must be strong enough to support the weight of shelving and containers. To do this, the floor should have a loading capacity of at least 175 pounds per square foot.[220]

Lighting. The center should have adequate and properly spaced lighting. "Aisles should be well illuminated, with lighting fixtures arranged so that shadows will not be cast on the stacks."[221]

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[218] Emmett J. Leahy and Christopher A. Cameron, Modern Records Management (New York: McGraw-Hill Book Company, 1965), p. 67.

[219] Ibid.

[220] Griffin, op. cit., p. 163.

[221] Leahy and Cameron, op. cit., p. 66.

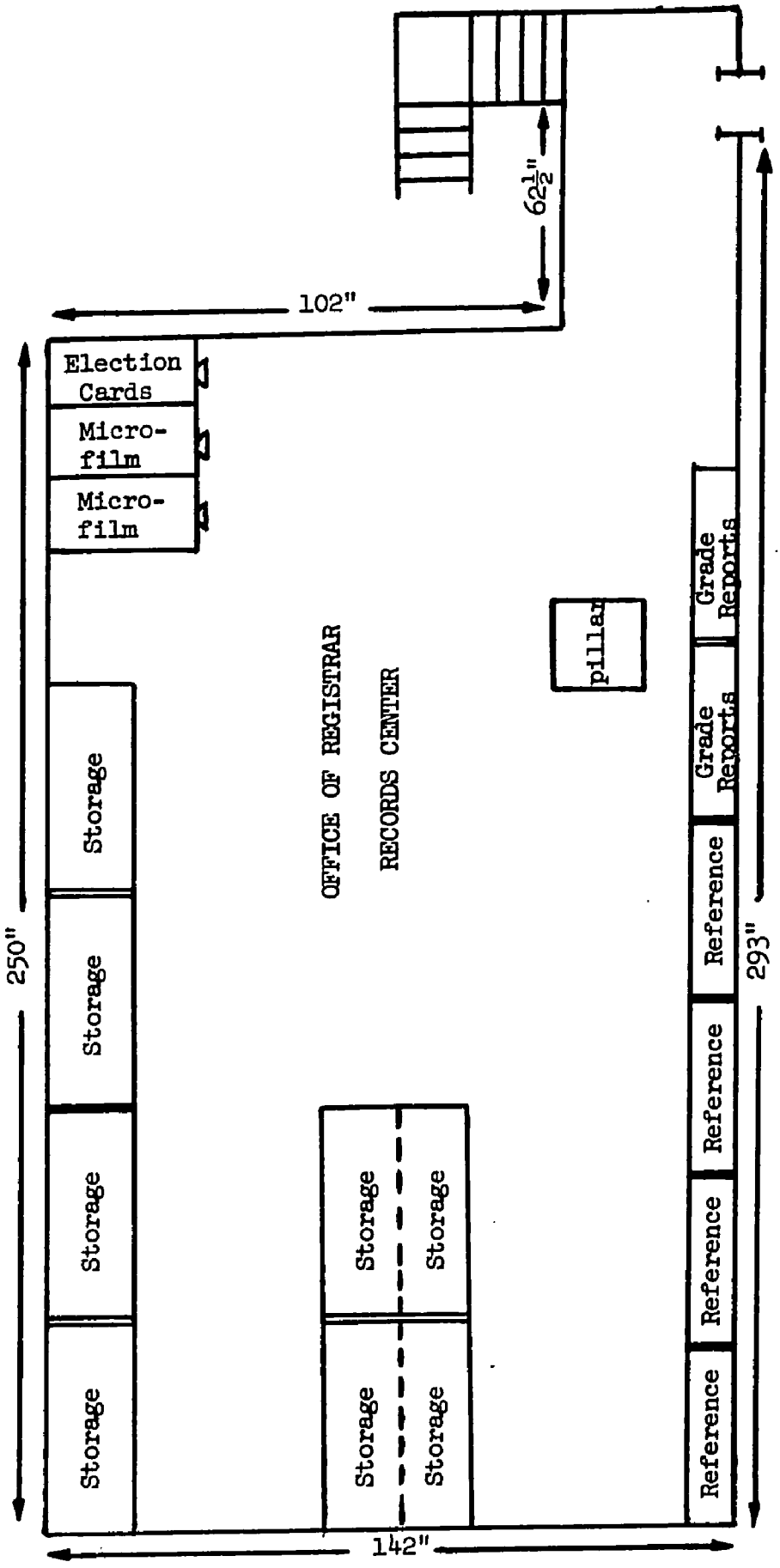


Figure 20. Layout of records center

Ventilation. The records area should have few windows, but should be well ventilated to assure proper humidity and temperature control. The relative humidity should be between 50 to 60 percent and the temperature should be between 65 and 75 degrees Fahrenheit.[222]

Fire Protection. One of the best protections in the event of fire is an automatic sprinkler system. However, water might be more damaging in the event of small fires. If such a system is not considered practical, a supply of fire extinguishers should be strategically placed around the center.

Equipment

The guiding principle in the establishment of a records center is to make use of the cubic content rather than the area. The objective is to store more records per cubic foot by taking advantage of the height.[223] The combination of steel shelving and standard sized corrugated containers is one of the best ways to achieve this objective, i.e., a maximum utilization of space at minimum cost.

Minimum costs

One indication of the basic differences in records equipment can be provided by way of illustration. For example, the average retail value of a four-drawer, letter-size file cabinet is $100.[224] In contrast, the standard size, corrugated storage container, when ordered in quantities of 1,000, runs $ .50.[225] Standard shelving for these containers costs

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[222]Griffin, loc. cit.

[223]Utt, loc. cit.

[224]This figure, supplied by University Purchasing, is based on 1970 figures.

[225]Quotation from the Paige Company, 432 Park Avenue, New York, N. Y. 10016.

approximately $ .81 per container.[226] Thus, the unit price for storing records in the corrugated containers on steel shelving is $1.31.

Since it takes six of the corrugated containers to hold the contents of a four-drawer, letter-size cabinet, the unit price ($1.31) should be multiplied by six for a total of $7.86. The difference between the $7.86 and the $100 value of the metal cabinet represents a possible savings of up to $92.14 on this one transaction. The differences are even greater where card equipment is involved.

Utilization of space

Planning for maximum utilization of storage space begins with two items: containers and shelving.

The most versatile type of container is the 10" x 12" x 15" corrugated carton. (See discussion on "Preparing Records for Transfer on page 124) This size of carton can be used to house letter- and legal-size documents, as well as odd-size papers and cards. Containers such as the Paige MIRACLE BOX are light and easy to handle yet extremely durable and will withstand the most rigorous handling and shipping requirements. They are collapsible and have hand grips at both ends which make for easy handling. (See Figure 16)

The full advantage of standard sized containers over any other form of storage equipment is best derived by the joint use of these cartons with steel shelving designed to accomodate a maximum number of such containers in a minimum of space.[227] Shelves that measure 42" wide and 30" deep can accomodate 12 containers. This is accomplished by

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[226] Benedon, op. cit., p. 68.

[227] Ibid., p. 70.

spacing the shelves 23" apart so that two rows can be placed on each shelf. Figure 21 depicts the two storage units located in the center section of the records center layout developed for the Office of Registrar. (See Figure 20) Shelving can be stacked as high as the ceiling height and floor capacity will permit. A close look at Figure 21 will reveal that the second row of the fifth shelf was not added. This was due to the low ceiling in the records center facility.

As indicated in the drawing, the two units can hold a total of 108 containers. This means that the contents of eighteen, letter-size cabinets can be effectively stored in a space that measures two and one-half feet wide and seven feet long.

It should also be noted in Figure 20 that the narrow shelving along one wall was designed for grade reports and other reference materials. This space was arranged purposely to make the most of the pillar located a few feet from the wall. The narrow shelving permits use of the entire wall and still leaves space for an aisle. This was not possible with the wider, standard shelving.

Container coding system

As containers are received at the records centers, they should be assigned permanent location numbers. The assignments should be based upon the sequential availability of space rather than upon an allocation of specific spaces to offices and departments. "It is not necessary to keep cartons containing related records in the same shelf space area since the records control card is checked to determine the carton in which the records are located. . . ."[228] Allocations of specific spaces usually

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[228]Griffin, op. cit., p. 159.

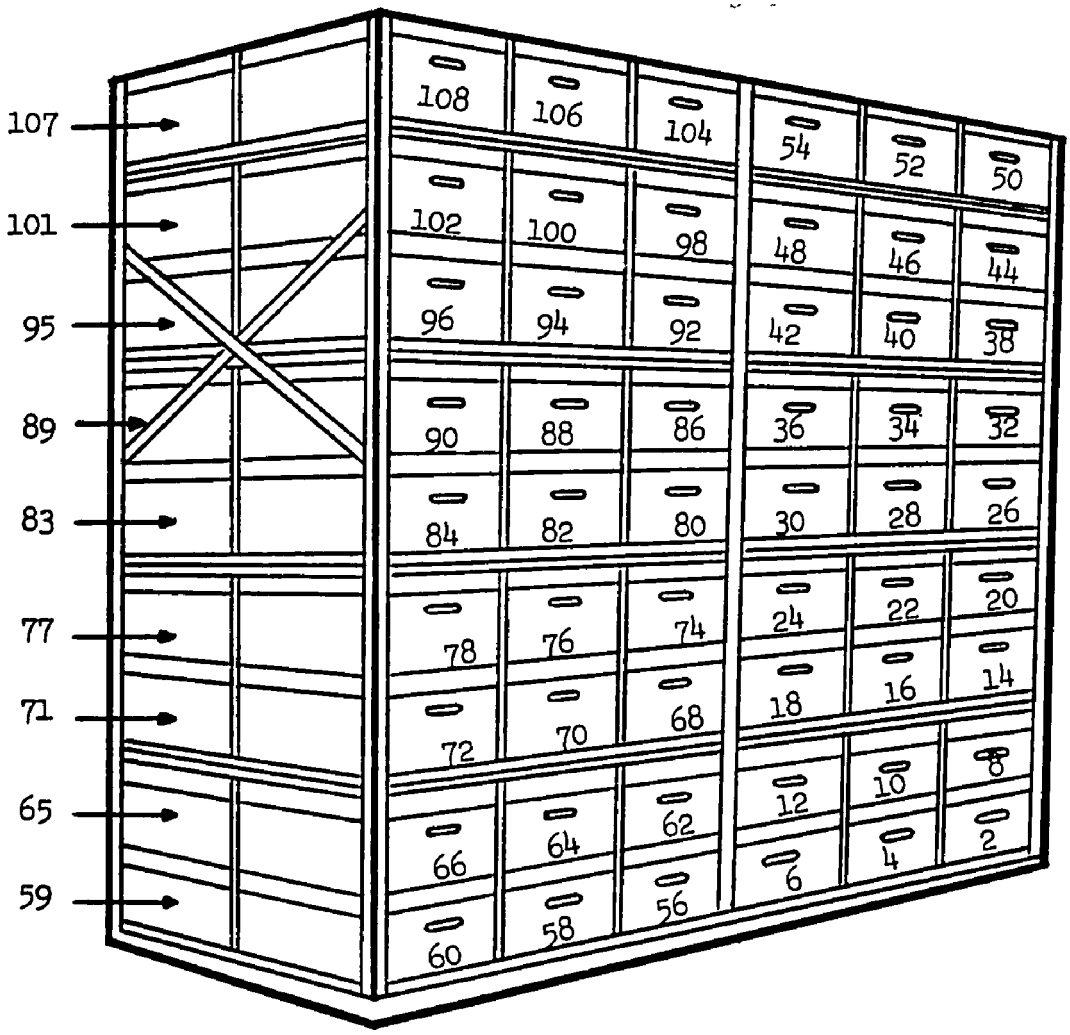


Figure 21. Storage units

result in a complicated and unbalanced situation with some areas overcrowded and others unused.

One way to structure a numbering system is to use a five-digit code. The first two digits would identify the row and the last three digits would identify the exact space in that row. Beginning with 001, container spaces would be numbered in the same sequence for every unit. For example, the containers in Figure 21 would be assigned numbers beginning with 10001 and ending with 10108. Each number represents a specific space on a shelf. If a container is moved to a different location, it assumes the number assigned to that space. When double units are used, the front containers would be assigned the even numbers and the back containers the odd numbers.

If expansion is contemplated, the numbers should run in the direction of that anticipated expansion. This is why the containers in Figure 21 are numbered from right to left. It is anticipated that expansion will move in that direction.

The sequential assignment of spaces and the use of a control number as the only identifying mark on a container serves another useful purpose, the security of information. Without the information from the control card, persons walking through the centers would have no knowledge of the containers contents.

Reference Services

One of the best ways to build confidence in a records center is to answer requests for information promptly and efficiently. If office personnel find that it is easy to retrieve information, they will be more willing to set reasonable retention periods and to transfer pertinent records to the center.

Requests may be handled in various ways. They may be received by phone, by mail, or by a personal visit to the center. The center may respond by providing an answer over the phone, by mailing or delivering the records or photocopies of the records, or by furnishing a suitable space for inspection and research.

Each request should be supported by a three-part, Reference Control form. (See Figure 22) The "each" in this statement can be interpreted in a number of ways. It can mean each individual's collective request, each type of record to be removed, each container affected, or each request at a particular point in time. The choice of these definitions affects the procedures used for control purposes. The objective is to get all the records listed on one form returned at the same time.

The original copy of the completed form is filed by schedule and item number and serves as the major source of reference. The second copy is established as a tickler file for follow-up purposes. Copy three accompanies the records. It serves as a routing sheet, and it facilitates refiling. If the request is completed by telephone or photocopy, copies two and three of the form are not needed and may be destroyed. The original is retained until reference counts are made and the annual report is compiled.

When records are removed from containers, charge out cards should be used to mark the spaces they occupied. The cards are of considerable help when it comes time to replace the records.

Records leaving the center should be labeled "RETURN TO RECORDS CENTER." This helps identify the records in the event they are separated from the routing copy of the request form.[229]

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[229]Benedon, op. cit., p. 104.

REFERENCE CONTROL

Name	Date of Request	Date of Service
John Doe	11-15-70	11-16-70

Office or Department	Request		Service
Office of Registrar	x	Phone	—
Address	—	Mail	—
1514 LS&A	—	Visit	—
	—	Delivery	—
Phone 764-6280	—	Other	x

Container No.	Years	Records Title or Description
12042	1962	Correspondence, residency R-3, Item 2
Date Refiled:		Refiled by:

Figure 22. Reference control form

CHAPTER IX

SYSTEM MAINTENANCE AND CONTROL

The success of a records disposition program depends upon management's awareness of the paperwork problem and upon their understanding as to the importance of finding a solution to it. They must let it be known that they believe in the program and that they are willing to support it.

Clark Kerr was one of the first university presidents to recognize the paperwork problem and to add his full support to the solution of the problem. On March 8, 1963, he issued a statement declaring that "a Records Management Program will be undertaken by the University [of California], under the general guidance of a University-wide Records Management Committee, reporting to the President . . . ."[230]

This statement contains four major points of interest: (1) It is a policy statement. This gives the program official status. (2) It is a commitment to action. It was emphasized that a "Program will be undertaken." (3) It reflects top level support. The Committee reports directly to the President. (4) It established a single authority in the form of a Records Management Committee. Universities are highly interdependent systems. The transaction of business depends upon a constant flow of records from one office to another. Because this regular flow—and accumulation—of paper is contributed to by so many sources, it is necessary that the records management program be controlled by a single authority.

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[230]Records Management Committee, op. cit., p. 4.

Powers of a Records Management Authority

If a records management program could be thought of as a mighty arch and if each element of the program could be represented by a different stone, "authority and control" would be the keystone of that arch. Just as the keystone of an arch locks all other pieces in place, properly placed authority provides the vital support needed to reap the full benefits of a records management program. The program must have the kind of authority that will allow it to service systematically the University and permit it to encourage maintenance of established schedules. Without this support, the entire "arch" will weaken and fall.

Based on their experience, the Records Management Committee at the University of California has concluded:

> someone should be assigned the task of making the records program move, and be given enough authority to see that it does. The important point is that the function be recognized and that responsibility for it be assigned at a level within the organization that has easy access to management and all divisions of the office.[231]

Organizing and administering a University-wide records management program is a major responsibility. Until the University has gained considerable experience and expertise with a program, authority should be assigned to a University-wide Records Management Committee. The kind of authority needed to function in this capacity can come only from the Board of Regents through the President of the institution. The primary reason for involving the Board is to insure continuity in policy.

The powers of the Committee should include, but not be limited to, the following:

1. To conduct inventories and to establish retention schedules for all offices and departments of the University. This is not to imply

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[231] *Ibid.*

that the records staff can walk into an office unannounced. The intent of this power is to prevent offices from deliberately postponing action for "unreasonable" periods of time. The records staff should not officially enter an office until the records management administrator and the office administrator have negotiated a mutually agreeable schedule. The staff must remember that they are guests in the office and, as such, they are expected to behave in a manner that will not adversely affect normal operations of the office. Offices would have minimum involvement in data-gathering and maximum involvement in setting retention schedules for office operations. These involvements are described in the preceding chapters entitled "The Records Inventory," and "Analysis, Appraisal and Approval."

2. To conduct audits in offices having approved schedules and to encourage maintenance of the schedules. The audit in this context is basically a mechanism for reporting to the office the status of its operations as they relate to approved retention schedules. Since the office plays a major role in setting retention periods for records in its possession, the audit, in one sense, is a means for determining whether or not the office has complied with its own decisions. The results of the audit would first be shared with office personnel. Any discrepancies would be discussed and, hopefully, resolved. Following this meeting, an official statement would be prepared for the office with a copy to the department head. In the event negotiations fail and violations persist, the records staff could take the following steps: (1) appeal to the department head or top administrative officer in the unit; (2) recommend that the University stop all purchases of filing equipment for the office concerned.

3. To develop policies and procedures necessary to implement the program. Policies should be formulated on such matters as the ownership of records, guidelines should be established for the protection of vital records in the event of fire, civil disorders or other threats to security, and procedure manuals should be developed to facilitate operations.

4. To consult with and advise offices on the purchase and use of equipment and materials related to records management. Ideally, the records program would have on its staff individuals trained in forms management, filing systems, microfilm systems and other related areas. These individuals should be involved in the planning for and use of equipment in the above mentioned areas.

5. To coordinate the services of records centers. The Committee should be responsible for developing systematic procedures for the transfer of records between and among offices and records centers. An example would be the transfer of historical records from the Office of Registrar to the Michigan Historical Collection.

6. To conduct studies related to the Records Management Program, including "use" studies of records in the various offices.

Composition of Committee

The task at this point would be to select a committee that can adequately represent the values and interests inherent in a total records program.

Priority should be given to the selection of individuals who can represent the legal, research, historical and fiscal values. They will have the major responsibility of appraising individual record series in their respective areas of expertise and will be the ones from the Committee authorized to sign the Records Retention Approval forms.

It would appear essential to the interests of faculty governance, as well as to the process of identifying all sources of inputs into information management, that faculty participate with administrative officers in reviewing and setting records management policies.

Another area to be considered is the rising interest in civil liberties. Records contain information. Some of this information is personal, and the individuals concerned may or may not be aware of its use. Since a records disposition program speaks to the questions of what records will be kept, where, how long, and under what conditions, one member of the Committee should have responsibility for viewing records from the standpoint of individual rights.

Finally, every effort should be made to secure adequate student representation.

Listed below are the values and interests to be covered and suggestions as to which position, offices or groups within the University might best represent them:

Administrative—the Academic Vice President or his delegate

Legal—the University Attorney or his delegate

Fiscal—the University Auditor or his delegate

Historical—the Director of the Michigan Historical Collection or his delegate

Research—the Director of Institutional Research or his delegate

Faculty—a member appointed by the Senate Advisory Committee for University Affairs

Civil Liberties—a member of the Civil Liberties Board

Students—a member appointed by the Student Government Council

A full-time, records specialist should serve as Secretary to the

Committee. He would be the professional administrator of the program and the official arm of the Committee.

Presumably, the Committee would function as a Regental body with procedures and powers as designated in the appropriate bylaw or directive.

Organizational Structure

As a University-wide program representing many areas and interests, the Records Management Committee and its Secretary, a records specialist, should report to the Office of the President. On the organizational chart, the Secretary's job would be considered a staff position, but through the specialized, formal powers of the Committee, it would function as a line position. (See Figure 23)

The Secretary would be appointed by the President based on recommendations from the Committee.

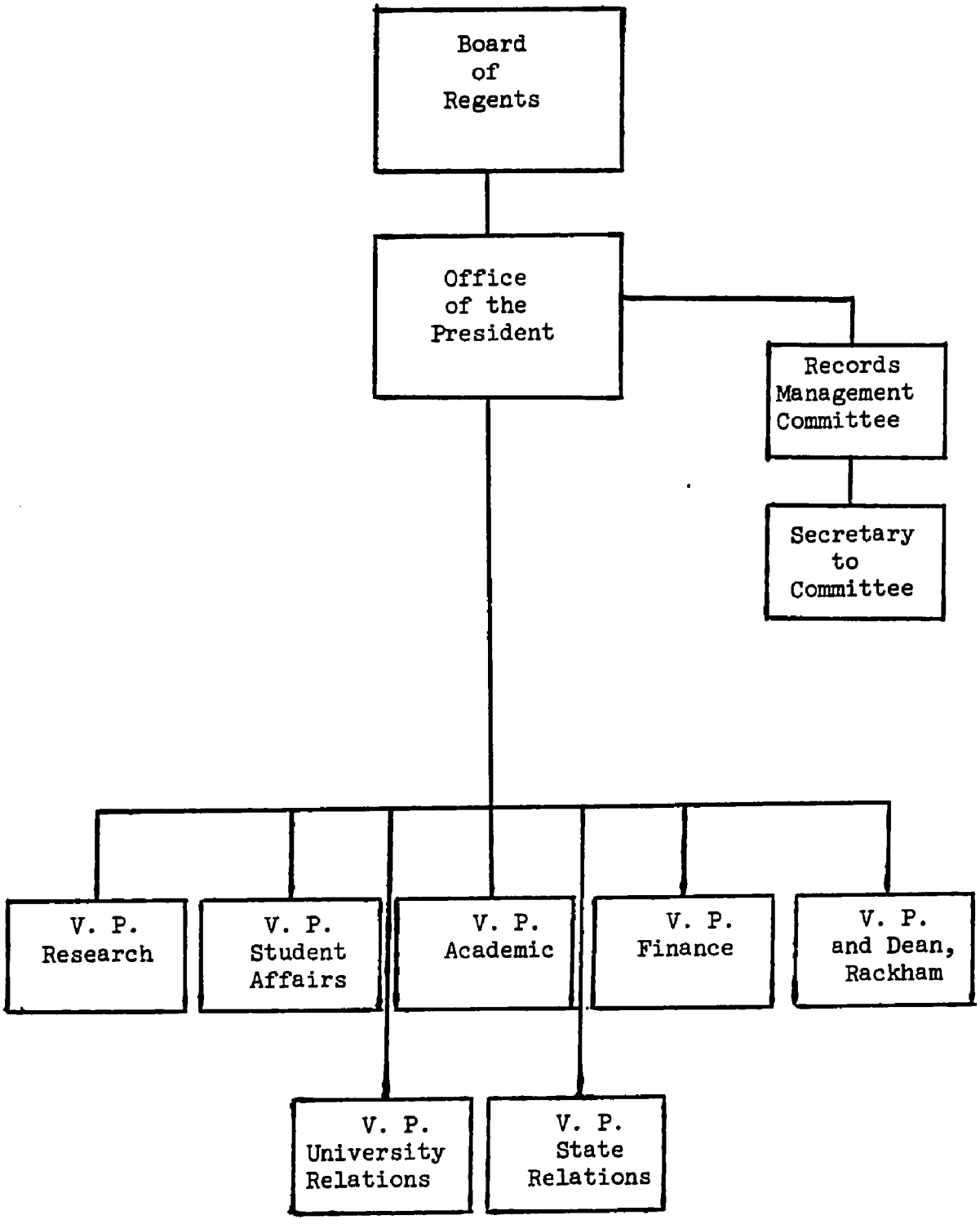


Figure 23. Organizational chart

CHAPTER X

RECOMMENDATIONS

It is postulated, in view of this study's findings, that recommendations would be in order to implement them. The investigator would recommend:

1. That the President of the University establish a University-wide Records Management Committee.

2. That this Committee report to the President's Office.

3. That membership of the Committee include representation from the following interests and offices:

a. Administrative—the Academic Vice President or his delegate

b. Legal—the University Attorney or his delegate

c. Fiscal—the University Auditor or his delegate

d. Historical—the Director of the Michigan Historical Collection or his delegate

e. Research—the Director of Institutional Research or his delegate

f. Faculty—a member appointed by the Senate Advisory Committee for University Affairs

g. Civil Liberties—a member of the Civil Liberties Board

h. Students—a member appointed by the Student Government Council

4. That the Committee be charged with responsibility for developing and implementing a University-wide records management program, beginning

with records disposition.

5. That the Committee be delegated the following powers:

a. To conduct inventories and to establish retention schedules for all offices and departments of the University.

b. To conduct audits in offices having approved schedules and to encourage maintenance of the schedules.

c. To develop policies and procedures necessary to implement the program.

d. To consult with and advise offices on the purchase and use of equipment and materials related to the management of records.

e. To coordinate the services of any records centers established within the University.

f. To conduct studies related to the records program, including "use" studies of records in the various offices.

6. That a records specialist be employed as a full-time Secretary to the Committee and that this person become the professional administrator of the program.

7. That a feasibility study be conducted relative to the development of a centralized records center.

APPENDICES

APPENDIX A

QUESTIONNAIRE CONCERNING STUDENT RECORDS AND THEIR USE AND PRELIMINARY DRAFT OF FINDINGS, 1963

THE UNIVERSITY COMMITTEE ON STUDENT COUNSELING SERVICES
113 STUDENT ACTIVITIES BUILDING
ANN ARBOR, MICHIGAN

July 26, 1963

The University Committee on Student Counseling Services was formed in September 1962. This Committee, chaired by the Vice-President of Student Affairs, is made up of representatives of several agencies concerned with student counseling and advising.

Throughout its deliberations this past academic year the Committee has shown concern for the keeping of records on students and the use of these records. The Committee felt that a better University-wide understanding of this area should be attempted. This Spring a Sub-Committee on Student Records and Their Use has been appointed to gather information about the use of student records.

This Sub-Committee is composed of Mr. Howard S. Bretsch of the Graduate School, Mr. John Hale of the Office of Student Affairs, Mr. Robert H. Hoisington of the College of Engineering, Dr. Donald L. Schaefer of Mental Hygiene and Mr. Clyde Vroman of the Office of Admissions. Mr. John Hale has served as Chairman of the Sub-Committee.

The Sub-Committee has met to consider its charge. The Sub-Committee felt that a questionnaire should be developed and sent to University agencies which may keep records on students. Your response to the enclosed questions will be of great assistance.

Upon completion, please return this questionnaire to 113 Student Activities Building. If possible we would like your response before August 10, 1963. If you have any questions, please call my office at extension 2129.

John Feldkamp

John Feldkamp
Recording Secretary

JF:zf

THE UNIVERSITY COMMITTEE ON STUDENT COUNSELING SERVICES
113 STUDENT ACTIVITIES BUILDING

Questionnaire Concerning Student Records and Their Use

1. What type(s) of information concerning students is kept on record in your office? Please attach a copy of your record forms if available.

2. For what period of time are these records kept? If some portions of the records are kept longer than others, please indicate.

3. For what purposes are these records used?

4. What University personnel may use these records? Please indicate if persons with other offices of the University may use your records.

5. What persons not employed by the University may use these records? Please indicate if the record is available for their personal perusal or if your staff transmits the information considered proper for these persons.

6. What additional policies are maintained concerning these records? Please indicate security measures practiced, etc. If written policies have been developed, a copy of these would be appreciated.

Signature

Office

Preliminary Draft

THE UNIVERSITY COMMITTEE ON STUDENT COUNSELING SERVICES
SUB-COMMITTEE ON STUDENT RECORDS AND THEIR USE
SURVEY ON STUDENT RECORDS AND THEIR USE

This survey reports the findings obtained from questionnaires sent to all the University agencies. The questionnaire is attached to this survey. The questionnaire was developed by the Sub-committee on Student Records and Their Use, a sub-committee of the University Committee on Student Counseling Services.

The response from the various University agencies was most generous. Nearly 130 agencies replied to the questionnaire. In many cases the form for their student records was included.

The survey is arranged according to constituent administrative units. Sections will be found on Schools and Colleges, Departments of the College of Literature, Science and the Arts, Departments of the Medical School, Departments of the College of Engineering, Departments of other schools, Attached Units, Academic Affairs Administration Units, Libraries, Research Units, Student Affairs Units, Business and Finance Units, Units under Separate Boards and unclassified units. This survey attempts to describe the practice within each of these constitute units as described by the agencies therein. No single agency is directly cited by name. Within each unit the student records and their use are discussed in the manner that questions were asked on the questionnaire.

SCHOOLS AND COLLEGES - 14 Responses.

While the types of information kept on students within offices of different schools and colleges were similar, the different schools used a great variety of forms. Most units kept admissions applications, transcripts, faculty comments, test data, correspondence relating to the student and reports of faculty action. Several units also maintain records of financial assistance and health statements. The units indicated that pictures were kept on file. The residence hall reports were also mentioned. The general practice was to use a form specially designed for the particular school or college. A few schools maintain only a manila folder which contained information relating to students. One unit mentioned that it kept no information of "a personal sort which could be construed as incriminating or would be unrelated to the academic experience."

The overwhelming response to the question of what period of time records are kept was either permanently or indefinitely. One unit indicated that while the transcript and certification materials were kept indefinitely, the other material in a student's file was kept only ten years. Another noted that five years after a degree is granted some material was discarded. Election cards were noted as being discarded by another unit when the student graduated.

Two purposes were predominant in reply to the question for what purposes the records were used. Recommendations for employers or other institutions was specifically mentioned by eleven units. Twelve units mentioned academic counseling. Four of the units designated as the primary purpose academic counseling. Five units stated that the primary purpose was recommendations. Those units admitting students not through the admissions office noted that papers accompanying admissions applications were used for that purpose.

Eight units replied that only authorized personnel of their school or college could use the records kept in their offices. Five permitted any authorized person to use their records not restricting such to personnel from that particular school or college, Five units mentioned a willingness to cooperate with other University personnel in making known the information kept within their office. It was noted that persons outside the unit seldom requested the use of records from one school or college. The use of the records was specifically limited in two cases to the geographical confines of the school or college office.

Eight units specifically mentioned and several more implied that no non-University personnel were permitted to handle the files. The prevailing practice was that information in the records would be transmitted to outsiders by someone on the school or college staff. The official record cards were made available to military investigators by one unit but it withheld all other material from such investigators. Two units specifically stated that the Federal Bureau of Investigation and Army and Navy Intelligence could view their records. In one unit the honorary and professional societies were able to view the transcripts. Two units stated that information on records would be released with the permission of the student.

Formal written policies were not indicated by any unit. The use of locked rooms and/or file cabinets were mentioned by several units. Others mentioned that the record keeping area was well-supervised. Two units made use of a fireproof vault. Several mentioned that sign-out procedures were maintained for the use of their files.

DEPARTMENTS OF THE COLLEGE OF LITERATURE, SCIENCE AND THE ARTS - 23 departments responded, seven sub-divisions of the departments responded.

No student records were kept by four of the units responding. Thirteen units stated that records were primarily on graduate students with only limited information on undergraduates. The type of information kept included transcripts, class cards, correspondence, teaching fellow appointments, awards and application forms. Several of the departments mentioned in matters concerning undergraduates they depended on the records of the school. Many different types of forms were again in evidence. Kardex forms, manila folders and other printed forms are used. The extent of record keeping varied with the functions performed by the different departments. One department that involved itself in placement matters kept quite complete files. One unit which dealt with international students kept a record of extra-curricular interests. Five units indicated that they kept pictures of students, one unit asked for a student's church affiliation.

Indefinitely or permanently was again the most prevalent response to the question on how long records were kept. Twenty units indicated this response. Other responses included the use of active files with inactive files after two to five years. The inactive files varied from those within an office to those in readily accessible storage. One unit indicated that it had hoped to develop an abbreviated system to facilitate storage.

Seven units indicated that their records were primarily used for job recommendations. Fourteen more units indicated this as a purpose. Two units classified academic counseling as the primary use, while ten more mentioned this as a purpose. Other purposes mentioned were statistical purposes, preparing the annual report, consultation for fellowship awards and scholarship allocations.

Five of the departments indicated that only personnel within their particular departments could use the records. Eight units indicated that while presently limiting the use to only departmental faculty they would considar others. Ten stated that any authorized faculty member could use their records. Two units specifically stated that the records were not open to students.

The prevalent practice for the transmission of information to non-university persons was by a member of a staff giving the information from the records. Several units indicated they would not give information to non-university personnel. Those that specifically mentioned the Federal Bureau of Investigation gave several responses. One unit states that the FBI and the Civil Service would consult its records in toto. Another showed its records to the FBI in the presence of the office manager. The other units seemed to follow the practice of having a member of the staff transmit the information.

Again no written policies were available from these units. Most of the units maintained locked files or offices. One mentioned that a special key was used that was not a sub-master. Other policies mentioned were the use of a check-out system and the practice of removing the records of students that later become employed by the Department to separate locked files. Space limitation was noted in one questionnaire. Another stated that no special security measures had been found necessary.

DEPARTMENTS OF THE MEDICAL SCHOOL - 13 Responses

The type of records kept within the Medical School reflected the unique educational practices of that school. Records such as faculty evaluations needed to be discussed with the student before transmitted to the Department for its records. Photographs of all medical students are supplied to the Departments by the Medical School. The practice whereby each medical student spends some time with each department was reflected in the practice of distributing photos, lists of names and the like. Records kept by Departments also kept examinations and class books. Material for the Medical School Promotion Board was kept within departments. One department mentioned that a student's biographical sketch was maintained. In addition to the above records, correspondence and transcripts concerning students were kept by departments.

The practice of keeping records indefinitely was again prevalent. Time periods were noted for some records such as blue books (about 1 year), promotion board determination (about 5 years) and grades and names (only when current). One unit stated that their policy was to keep material as long as it was pertinent and useful. One unit felt that a year or two is all that was necessary because the school maintains the same records.

The formulations of recommendation for internships and residencies was the most prevalent use of these records. Other purposes mentioned were identification, evaluation of the teaching program, counseling, reference and information for trends.

Most of the departments mentioned that they would consider requests from persons outside the department concerning the information kept on their records. Several limited the use of their records to only the department or persons within the school. One unit mentioned that it considered most of its information public.

Several units specifically stated that no non-university personnel could use their records. The practice of transmitting the information through a member of the staff was noticeable in other units. Other policies indicated were requiring the release of information from the student and permitting governmental agencies to have some access to the files.

No written policies were made known. The policy of a locked file or office was mentioned by most of the units. One described its security measure as the office being "theoretically locked."

DEPARTMENTS OF THE COLLEGE OF ENGINEERING - 9 Responses

All but one of the Departments responded that they kept records on students. Several record forms were provided giving detailed description of the information kept by the departments. Information of some length is kept on the academic development of the students. Course elections and other information necessary in their counseling functions are kept by departments. More detailed information was kept in the case of the graduate students. Several of the departments kept photographs and other personal information. One department noted that giving personal information was voluntary. Records indicated in two cases that ancestry of the student was requested and in one case church affiliation.

All of the departments kept some information indefinitely. The detailed files of undergraduates were discarded after a few years in several cases. One department indicated that they were considering microfilming of their inactive files. Forms for election of courses were not kept beyond graduation. All transcripts were retained indefinitely.

The records were primarily used for counseling and reference purposes. Giving recommendations for students was an important, but often secondary purpose.

All the departments indicated a willirgness to consider permitting University personnel outside their department to use these records. No department indicated a restriction to strictly departmental personnel. One made clear that records were not available to students. It was noted that primarily the departmental staff used the materials.

The departments were generally quite restrictive on the use of records by non-university personnel. With few exceptions the information was transmitted by the departmental staff. In dealing with the FBI some difference in policy was evident. One department expressly stated that the FBI and Civil Service investigators could see their records. Other departments made clear that the information was transmitted by their personnel. One department specifically stated that employers could not see the records.

While records were kept in supervised offices none of the departments indicated locked files. In several cases it was noted that the files were unlocked. Three departments expressly stated that students could not view the records, but one department said that students were allowed to examine their own records in the presence of a faculty adviser. One office expressed its view that records were not important enough to microfilm.

DEPARTMENTS OF OTHER SCHOOLS - 5 Responses

Three of these departments indicated that no records were kept by their offices. These units stated that the school or college maintained the records for their use. One of the other units kept a 5 x 8 card with general information on the student and noted that correspondence relating to the student's grades, etc. was also kept. The other department keeping records had a 3 x 5 card for course selections and grades.

Both departments indicated that their records were kept indefinitely. One noted that after three to five years, though, it turned over its records to the school's recorder.

One of the purposes for which the records were used in both cases was recommendations for future employment. One unit also noted its use of this information for counseling. Another purpose was for making certain reports. In some cases these records had been used to poll opinions on certain questions.

Both units responding limited the use of these records to their individual department. One suggested that a more complete file could be found in the school's office.

Neither unit indicated that outsiders had access to their records. One stated that the department would transmit information considered proper.

One unit indicated that its records were kept in locked files, the other said that the records were open only to the faculty of that department and the faculty of another area related to the department.

ATTACHED UNITS OF SCHOOLS AND COLLEGES - 7 Responses

It must first of all be recognized that this is a grouping of several diverse units. In one case the records related only to elementary and high school students and were therefore not considered germane to our study. Another unit did not keep student records while a third merely kept the names of students that used their facilities. The other four units responding all kept some information. One group kept the form completed by students seeking appointments as research assistants. Another kept in addition to identification information, testing information relating to their unit. Two units kept rather extensive records on the students using their specialized counseling services. Notes of interviews, progress reports, test information and the like were kept.

The records of the unit with research assistants were kept only five years. A second unit kept their records indefinitely. Of the two specialized counseling services one kept its records for a ten-year period, the other only during the student's enrollment at the University.

One unit used its records to answer inquiries concerning employment. Another responded that its purposes were requests by their agencies, follow-ups and research. Another unit mentioned its purposes were further counseling, aiding the perfection of their service and its research data. The fourth unit stated that its purpose for maintaining records was for possible reevaluation of the reports made by the it.

One unit stated that their records were available only to faculty personnel of the school. A second unit stated that its practice was to transmit appropriate information to University personnel outside their unit. Another limited the use to persons within their service. The last unit stated that their records being confidential required the consent of the student involved.

Outside personnel were unable to use the records of two of the units responding. A third would transmit information through their staff. Another would transmit information only to other schools and colleges.

In response to additional policies and securities measures only one unit responded. It stated that its records did not leave the unit.

ACADEMIC AFFAIRS ADMINISTRATION UNITS - 8 Responses

While two of these units did not keep student records, the other units kept a wide range of material on students. One unit kept only transcripts and statistical information. Governmental forms of a quite complete nature, both personal and academic, were kept by several of these units. Other units kept purely academic information such as course elections and the like. Admissions information was kept by some of these units. Information kept included educational background, letters of recommendation, future educational plans, test scores and the like. Those units keeping personal information in two cases maintained pictures. Two of the forms have space to designate one's religion. One unit involved in placement of students kept records for that purpose.

One of the offices involved with admitting students discarded their records after two years if student that did not enroll and transferred records of the student who did enroll to other units dealing with these students. Two departments while quite similar information had quite different policies as to the length of time records were kept. One unit kept the records indefinitely, another kept their records only two years after the student had completed their curriculum and three years after the student left the school, if he had not completed their curriculum. One unit dealing with statistics kept these records permanently. Another stated indefinitely and still another had a general rule of discarding records once the student's course work was completed.

The purposes for which the records were used again varied greatly. Admissions counseling was a purpose of the units dealing with such. General counseling was a significant purpose of several units. Some used their records to evaluate a student's potential. Others kept records merely for statistical purposes. Two of the units responded that their records were used for placement of students.

Only one of the units had explicit policies concerning the use of the records by the University personnel. The unit with explicit policies limited the use of the records to agencies of the University for whom these records were kept. Other units stated that their records were open to members of the University staff for any legitimate reason. One limited the use to staff members and selected non-academic personnel. In some cases the records were primarily for the use of the unit while in others the purpose for keeping records was for the University as a whole to have access.

Policies concerning the use of the records by non-university personnel were in all cases more restrictive. One unit restricted use of its records to only persons with approved credentials and then a member of the staff would transfer such information within the power of the unit to release. Several of the units permitted representatives of governmental agencies to personally peruse the records. In two of the cases such perusal was limited to investigators from the related governmental agency to which the unit was attached. Another unit permitted employers to view such records that were submitted for placement purposes by the student.

Additional policies were made known by some of the units responding. One unit stated that security measures were practiced through the training and supervising the personnel within their office. Another unit used locked vaults or rooms. Two of the units adhered to governmental regulations which related to their units. One unit classified its records as confidential except to the person on whom the records were kept. None of the units responding had written policies other than the governmental regulations cited for two units.

LIBRARIES - 3 Responses

Only two of the units responding had current student records. The third had records only of a historical nature which were of little relevance to this survey. The units responding which had records, kept only employment records relating to students. One unit had space for the evaluation of the student employee's work. Forms for the records of one of the units were supplied.

One of the units kept their records indefinitely. The other kept applications only until the student left its employment. The evaluation card and other correspondence were kept at least seven years.

The purposes for which the records were used were similar in both cases. The records served as a business record of employment, were used to answer questions from individuals concerned with employment, and in one of the cases were used to evaluate a student's work within the unit.

All University personnel were able to use the records of one of these units. The others limited the use to persons within their unit dealing with employment matters.

Both units followed the practice of transmitting information through a staff member to non-university personnel.

In reply to the question concerning additional policies one unit made clear that its records were part of the confidential personal files of that unit. The other unit stated that there was nothing confidential in their records thus far. This latter unit is in hopes that more detailed information on employment would be kept in the future in that they felt that such information would be valuable.

MEDICAL UNITS - 3 Responses

Only one of these units kept records on students. One of the units stated that its student records were maintained by its related department in the Medical School. The one unit responding that they had student records worked with students in a special counseling capacity that was completely confidential.

This unit stated that its records were kept indefinitely.

The purpose for which its records were used was "counseling as required."

In response to whom may use these records this unit responded that neither University personnel nor anyone outside the University could view these records without special permission of the student involved.

All student records from this unit were kept in special locked files in order to maintain confidentiality.

RESEARCH UNITS - 4 Responses.

Three of the units responding maintained only student records of employment. Forms for such records were either the regular University appointment form or a similar application specifically designed for the unit. Such forms generally call for personal data, past employment, educational record and references. Another unit kept records on fellowship recipients, recording the amounts received and the sources of funds.

Two of the units kept their records indefinitely. A third kept records only during the period of the student's employment plus several weeks. A fourth unit kept record only during the student's employment.

The purposes for which records were used were employment considerations in three of the cases and in the fourth the determination of one's eligibility for fellowships. The employment records were generally limited to a supervisor.

One unit stated that its records were available only to personnel office or the the office of the Vice President for Research. The unit with fellowship records stated that names were available to any University office.

No non-university personnel were able to use the records of one unit. Another did permit the Federal Bureau of Investigation personnel to view the records. The unit dealing with fellowships said that the names of the fellowship recipients could be made known to anyone.

A locked file was a security measure followed by one office. Another stated that normal University personnel policies were followed. One unit said that their records were treated as "administrative confidential."

STUDENT AFFAIRS UNITS AND RELATED SEPARATE BOARDS - 6 Responses

One of these units did not have any records on University students. Another limited its student record keeping to that of student employees. Informal notes of counseling interviews were the only records kept by another unit. In two cases confidential material of considerable amounts were kept, in one case for medical purposes and in the other for placement purposes. One of the units keeping detailed information specifically stated that reference could in no way be made to a student's race, religion or national origin. Pictures for informational purposes were kept by one of the units. Registrationaires were kept by one. One unit had need for examples of a student's handwriting.

The period of time records were kept varied considerably. In two cases records were kept permanently and in another for the lifetime of the student. One dealing with only informal counseling notes retained such only as long as they were useful to the counselor. That unit dealing with employment kept those records for seven years.

The purposes for which records were used again varied considerably. One's purpose was for the counselor's use only, another for placement purposes and another for information purposes. One unit distinguished the use of active records which were used for reference, and inactive records which were used for research and to answer requests for information. The unit dealing with employment kept its records for evaluations and to answer requests of future employers.

Nearly all of these units limited the use of their records to the personnel within their unit. One dealing with confidential information required a signed release of information. The unit dealing with employment made its records available to the University Personnel Office. One stated its willingness to interpret information to other persons within the University.

None of the units responding made their records available directly to non-university personnel. One provided ozalid copies of certain material to persons with bona fide requests. Others required a specific release of information from the student. Two units responded they would transmit information deemed appropriate to individuals outside the University.

All of the units responding practiced some security measures, including the use of locked files, vaults and supervised offices. One unit kept a special file for particularly confidential records. Another followed the practice of not dictating confidential material through the secretarial staff. It required the particular counselor to make his own record on such matters and keep it within his own office. These policies were in all cases unwritten.

BUSINESS AND FINANCE UNITS - 17 Responses

Nine of the units responding stated that they did not maintain any records on students. Two units kept employment records which in no way designated whether one was a student or not. A unit dealing with employment kept a few student records but they felt these served no purpose useful or significant to other offices. One unit that served many agencies within the University stated that its records were the property of these other agencies and that questions regarding their use or purpose should be directed to these other units. The remaining units in all but two cases had only employment records on students. This other unit kept negatives of student pictures. One office maintained records on students' financial assistance and payment of student accounts. The data kept was largely address and identification data and some specific information relating to the amounts due.

The office maintaining records on students' financial matters kept only current records. Upon payment of accounts the records were destroyed. Address lists were of course only while current. One unit with employment records distinguished between regular and temporary employment, keeping records seven years after termination of the former and one year after termination of the latter. Another unit with employment records maintained the records indefinitely. The policy of the unit that kept photographs was a five year period of time.

Employment records were used for evaluating one's employment status and rate of compensation. One involved with student accounts sought to maintain information for following up delinquent accounts. The unit dealing with photographs supplied different University units with the same.

Policies concerning the use of these records by University personnel varied considerably from unit to unit. One limited its use to its own personnel. The records were open to nearly all University employees in another unit as long as the material was consulted in the office of this record-keeping unit. The policies of the personnel office were adhered to by two of the units.

Non-university personnel had some access to the records of these units. One unit permitted authorized auditors to peruse personally the records but used its staff to transmit information to other persons. Two offices required all non-university personnel to obtain information through members of the unit's staff.

Additional policies were made known by some of the units responding. General procedures for their type of business were used of one unit. The policy of requiring requests for information to be in writing or in person was followed in one case. Proper identification would be required by anyone making such request. Certain information is definitely not given out such as salary, unless specific permission is received from the individual whose record is being examined.

UNIVERSITY RELATIONS UNITS - 4 Responses

Of the four units responding three kept no student records and the other only records for temporary employment. The policies followed by this latter office were not significantly different from the policies adhered to by the units within Business and Finance.

UNCLASSIFIED - 4 Responses

These units related to the University were difficult to classify within the above groups. None responding kept records on students.

DEC 6 1963

APPENDIX B

RECOMMENDATIONS FOR USE OF STUDENT RECORDS, 1964

Records

Alum catalogs

Shafer –
Beckett –
Spurr –
Bagley –

TO: The University Committee on Student Counseling Services

FROM: The Sub-Committee on Student Records and Their Use

RE: Recommendations for Use of Student Records

The Sub-Committee on Student Records and Their Use has considered various types of information kept on students and how such should be used. The types of information have been broken down into various categories and suggestions are made concerning the use of this information. The reaction of the entire Committee is now requested.

Personal Information:

Public Information: This information should be kept by schools and colleges and in The Office of Student Affairs. The following information could be released upon request to anyone:

Name ✓
Local Address ✓
Local Phone ✓
Home Address ✓
Home Phone ✗
Class ✓
School ✓
Sex
Marital Status
Employment History
University Recognized Activities
Military and Selective Service Record
United States Citizenship
Majority

Name of Parent, Guardian or Spouse: To be released to University agencies only.

Occupation of Parents: To be released to University agencies only.

Photo: To be shown to University personnel only, not to be removed from the student record.

Religion: To be given by the student voluntarily and to be released through the Office of Religious Affairs only to University agencies.

Race: Not to be a part of a student's record.

Nationality: A statement as to the nationality of a student other than whether he is a United State citizen should be released through the International Center to persons who have legitimate reasons to use such information.

Date of Birth: The date of birth should be disclosed to University agencies only.

Name and Address of Friend: To be released to University agencies only.

Number of Children: To be released to University agencies only.

Signature: To be released to University agencies and proper law enforcement agencies.

Academic Information:

The following items of information should be kept by schools and colleges and released only to University agencies, other academic institutions, prospective employers, parents of minors, scholarship granting agencies and academic, honorary and professional societies:

Transcript information
Courses and Instructors
Previous educational institutions attended
Dates of attendance at the University of Michigan
Rank in class

Admissions Applications: Information from admissions applications should be made available only to University agencies which deal with admissions of students.

Election Cards: To be released only to University agencies.

Interim Semester Grades Uniformly Reported: To be released to the student and proper University counseling personnel.

Residence Hall Staff and Other Counseling Remarks: These are to be used only by the person to whom the information is directed.

Written Assignments and Blue Books: To be used only at the discretion of instructor to whom they are directed.

Class Books: Information to be used in accordance with the policies of the various schools and colleges.

OAIS, College Board and AEC Test Scores: These scores should be released to the student involved and proper counseling personnel after instructions for interpretation are made available. A student who is being tested should know before taking the test what agencies will receive this information and for what purposes the information will be used.

Health Information:

Confinement in Health Service Infirmary: Public information.

Physical Disabilities: Disabilities made known by the student may be released to other University agencies.

Other Information: All other health or medical information may not be released without a signed release from the student involved.

Financial Information:

Scholarship Recipients: Public information as to whether one is a recipient or not.

Amount of Assistance: May be released to University agencies and other sources which grant scholarship assistance, including parents and guardians.

Financial Record: Information pertaining to a student's financial reliability may be released to University agencies only unless such becomes part of another record -- a transcript, court record or other media which would govern its release.

Discipline Information:

Court Records: Public information to be released upon request.

University Judiciary Decisions: May be released to other University agencies, not to be released to others unless such becomes part of a student's transcript.

Newspaper Reports: Pulbic information.

JF:zf
May 1, 1964

APPENDIX C

RATIONALE AND STATEMENT OF PRINCIPLES REGARDING STUDENT RECORDS AND THEIR USE, 1965

OSA Policy regarding student records and their use:

The University believes in and has an obligation to maintain records for each individual student to provide the intelligent and purposeful direction necessary to the achievement of the education goals of the institution. Further, the University respects and protects the integrity and the privacy of the individual student. Because non-compulsory counseling facilities are available, each member of the University counseling staff acknowledges his obligation to respect the integrity and promote the welfard of the student(s) with whom he works.

Michigan state law (see attached) has recognized that questions as to the confidentiality of records and the transmission of information about them will arise. In an attempt to eliminate the need for making decisions in times of crises, an effort to state our position in regards to these matters appears well-advised.

We recognize as our responsibility the insurance that the content and manner of record gathering are limited to those which contribute to the efforts to educate the student. Further, that the use of records and the release of information contained therein carry with them professional and legal responsibilities.

Release of Information:

I. To Whom Information May be Released:
   1. Authorized University personnel will have access to student records.
   2. Consistant with efforts to contribute to the education of the student, information may be released to other educational institutions provided it is released by an authorized official.
   3. No student shall have access to his own record, nor to the record of any other student.
   4. No outside person or agency will have physical access to a student's record except by an order from the courts.

II. If a signed release of information is presented from the student by an outside person or agency:

   Information will be given in accordance with the statement as to what is to be released, provided the signed release is from a student who is twenty-one or at the request from the parents (guardian) of any student under twenty-one years of age.

III. If there is no release, information may be released to outside persons or agencies under the following limitations:

   1. Anything that is already a matter of public record will be released.
      a. No loan information will be given.
      b. See list attached.
   2. Information which involves value judgments by any staff member will not be released.
   3. Information not requested will not be given, unless it is public information.
   4. It is suggested that the interviewer be asked whether it is an interview where his (the name) was given as a personal reference or becuase he is a staff member.

3.

IV. By Whom Released:

1. The personnel records of students shall be handled by authorized University (OSA?) personnel only.

2. No outside interviewers shall handle an official student record. Information from a student's record may not be released in visual form but must be interpreted by authorized University personnel for an outside inquirer.

3. If there is any doubt as to the competence of the personnel involved to interpret the information, the interpretation is to be referred to the originator.

Definitions of authorized University personnel:

1. Primary access have direct access to the files.[a] Administrative staff members of Housing, Financial Aids, Student Activities, Counseling, Community Relations, and the Vice President's office (or divisions as staff may be structured by the Vice President only.) Primary responsibility for interpretation and policy rests in Counseling who may refer. Therefore staff, above, may be called upon at time to interpret student records.

   b. Clerical staff who must necessarily use the records in their duties of filing, posting, pulling records for administrative use or in the course of their assigned duties.

2. Secondary access (Interpretation by an OSA staff member after an inquiry regarding information desired and purpose for which it is intended)

   a. Administrative staff members of the other departments under the direct jurisdiction of the Vice President for Student Affairs. (Bureau of Appointments, International Center, Office of Religious Affairs, Health Service, Bureau of Psychological Services (Bureau of School Services?)

   b. Members of other University departments:
      1. Members of the teaching faculty and academic administrative departments.
      2. Members of non-academic departments (e.g. Business Office, Alumni Catalog Office, Registration & Records, etc.)

Removal of Student Records from their file:

1. Staff Offices within OSA (folders will be taken out and outcard inserted as indicated.
2. Any other use is discretionary (e.g. police, other departments.) It is recognized that incidents occur which necessitate cooperation with other units for the good of the student. However, it is suggested that if, in connection with the "public use" clause in the legal basis of our records policy, a request is received for out of office use, an authorized member of our staff TAKE the folder to the inquirer interpret the data as needed, and return the folder to the file.

EKD:ms May, 1965

APPENDIX D

SUBPOENA FROM COMMITTEE ON UN-AMERICAN ACTIVITIES, UNITED STATES HOUSE OF REPRESENTATIVES, 1966

Original

UNITED STATES OF AMERICA

1376

Congress of the United States

To Director, Student Activities and Organizations, University of Michigan, Ann Arbor, Michigan, GREETING:

PURSUANT to lawful authority, YOU ARE HEREBY COMMANDED to be and appear before the Committee on Un-American Activities of the House of Representatives of the United States, or a duly appointed subcommittee thereof, on August 16, 19 66, at 10 o'clock, a m., at their Committee Room, 440, Cannon Office Bldg., Washington, D. C., then and there to testify touching matters of inquiry committed to said committee, and not to depart without leave of said committee.

YOU ARE HEREBY COMMANDED to bring with you and produce before said committee, or a duly authorized subcommittee thereof, the following:
Copies of certificates or statements, of membership, filed with the University of Michigan, for the purpose of obtaining status as an accredited campus organization, by the following organizations: 1. Committee to aid the Vietnamese and/or People; 2. May Second Movement; 3. Medical Aid Committee for Vietnam; 4. Student Committee to send medical aid to the Front of National Liberation of South Vietnam; 5. U. S. Committee to aid the National Liberation Front of South Vietnam; 6. Voice Political Party; 7. Vietnam Day Committee; and 8. W. E. B. DuBois Club.

HEREOF FAIL NOT, as you will answer your default under the pains and penalties in such cases made and provided.

To Donald T. Appell, Chief Investigator, to serve and return.

GIVEN under my hand this 29th day of July, in the year of our Lord, 19 66.

Chairman—Chairman of Subcommittee—Member Designate of the Committee on Un-American Activities of the House of Representatives.

16—71627-1

If you desire a conference with a representative of the Committee prior to the date of the hearing, please call or write to: Staff Director, Committee on Un-American Activities, Washington 25, D.C., Telephone: CApitol 4-8121—Ext. 8051.

APPENDIX E

RECOMMENDED POLICIES ON STUDENT RECORDS, 1970

Recommended Policies on Student Records

(Adopted by The Senate Assembly April 20, 1970)

Introduction

Keeping of records is essential to nearly every activity of The University of Michigan. Records kept are thus multiple and diverse. Accordingly, there is a special vulnerability for inappropriate disclosure which calls for exceptional consideration.

Several surveys concerning the nature of student records have been made in recent years. Primary among these have been the two reports compiled by the Office of Student Affairs, one released by Mrs. Elizabeth Davenport in 1963, and another submitted by Mr. James M. Lawler in 1968. The Civil Liberties Board in preparing this report for the Senate Assembly has made extensive use of these materials, and in addition has solicited selective samples of the nature of local student records and existing policies governing them, and has assembled information on handling of student records from several sources outside this University and State. While the policies regarding accumulation, retention, and release of students' records in recent years generally have been commendable, there has been a lack of uniformity, of formality, and of clear understanding of

individual responsibility among keepers of records. This report is directed toward the establishment of broadly accepted and clearly stated principles of reasonable uniformity regarding maintenance of student records for local evaluation and regarding disclosure of their contents, both within and outside the University. This document is not intended to serve as a statement of formal rules or procedures or bylaws governing operations of offices or individuals within the University, but rather as a faculty statement of philosophy concerning maintenance and disclosure of student records.

In order to protect all students against potential threats to their individual rights inherent in the maintenance of records and the many disclosures requested regarding them, the Senate Assembly recommends the following principles for adoption in every University office maintaining student records. The phrase "student records" in this context refers to name-linked files assembled in the normal execution of official University functions which are intended to be made available to people other than those initially assembling the records.

General Statement of Philosophy and Procedure

Any office of the University should view the information printed and publicly distributed in the University of Michigan Student Directory or in The University of Michigan Directory,

presented in the form published, as public information which may be freely disclosed. All other information should be available only if there is a) reasonable need to know in the case of official parties within the University or b) reasonable authorization to know in the case of parties outside the University. Both inquiries and responses for information other than the public information outlined above should be in writing with full copies of both retained in the file involved. General inquiries should normally be directed to the Office of Student Affairs in view of the comprehensive nature of its records, its general responsibilities within the University, and the formality and uniformity of its policies for maintenance and disclosure. Suggested forms for general use throughout the University for release of student information and for authorization of release by individual students are included as part of this report. The policy statement of the Office of Student Affairs is available.

Two matters of particular concern should be emphasized here. First, Michigan Statutes include a provision prohibiting the disclosure by any school employee of any information on behavior (which presumably in its broadest context would include behavior in courses: grades) or any information given in confidence (presumably always at least implied) regarding students or

minors to any court in either civil or criminal proceedings without the prior consent of the person, or parent or legal guardian if the person is a minor (see "Office of Student Affairs Policies Governing Student Records" for citation and wording). The existence of this statute would seem to demand the exercise of special caution when response is being made to requests for information from outside the University. Second, an individual who maintains records apart from regular files should do so only with the clear understanding that he alone bears the full onus in case of accidental misuse of such information.

Recommended Policies on Student Records

1. Each unit should keep only that minimum material required directly for its official functions. No records of court actions or of race or of political or religious associations or convictions should be kept, except at the student's request. (This rule does not prohibit the collection of data submitted voluntarily to the University Human Relations Office for compliance with HEW and similar regulations.)

   The statement of the "Office of Student Affairs Policies Governing Student Records" is a comprehensive document which the Senate Assembly recommends as a model, as appropriate in specific cases for all University offices.

2. Files should be retained only for the minimum period required to serve the basic official functions of the office involved. At the end of that period, such records should be disposed of in a manner that will not violate their confidential nature. Any necessary formal disposal policies should be set down in writing for the personnel of that office.

3. Students should have access to their records in so far as this access does not violate the rights of others. Students should, at least, know the nature of the contents of their files. If there are to be confidential documents placed in their files, they should be notified of this in advance of the preparation of their files. Normally, students should be able to review the contents of their files periodically. Students should also have the right to reply to or suggest deletion of derogatory evaluative material or statements of an accusatory nature kept in their files. Files should remain in the possession and presence of a member of the maintaining office at all times.

4. Material gathered for local evaluation that cannot be reviewed by the student without violating the conditions of confidence under which the material was solicited should be removed from the files after it has served its stated purposes

(appointments, honors, awards, discipline, etc.); and while it is kept, it should not be shared beyond those implementing its original purpose. In no case should such material be transmitted outside the University except at the request of the student and with the permission of the author.

Confidential letters of evaluation specifically requested by a student, and intended from their inception for release to individuals or units outside the University, should be used only on those occasions directly requested by the student, except when the student has signed an authorization for documents on file at a placement office to be sent to specified categories of recipients.

5. Under these policies, all students records should be open to anyone within the University who demonstrates a need to know consistent with his official function for the University and consistent with normal professional and legal practices.

6. Student records should be opened to persons outside the University only if such disclosure legitimately serves the purposes of the University, and then only at the request or with the permission of the student, or his parent or legal guardian if he is a minor. Information provided under this policy should be presented as it appears on our records and without annotation (see suggested request and report forms,

appended). As noted under 4, confidential letters of evaluation specifically requested by a student, and intended from their inception for release to individuals or units outside the University, should be used only on those occasions directly requested by the student, except when the student has signed an authorization for documents on file at a placement office to be sent to specified categories of recipients.

Special caution should be exercised in meeting federal requirements for reports regarding nonimmigrant foreign students in order to safeguard the civil liberties of these guests. Completion of registration should be certified in writing by the Registrar to the Director of the International Center. Judgments regarding satisfaction of requirements to carry "... a full course of study, ... to attend classes to the extent normally required, or ... (to terminate) his attendance at the institution," as required by federal code, should be made by the faculty and administrative officers of the department and/or college or school in which the student is enrolled. Failure to satisfy the academic standards of that unit should be transmitted in writing by the appropriate academic departmental Chairman or Dean to the Director of the International Center. The Director of the International Center is charged with the responsibility by the University to make these reports to the government on the required federal forms, and these

reports should be made quoting the information as received from a departmental Chairman or a Dean or the Registrar without annotation. Foreign students, while resident in Michigan, are also protected by the Michigan Statute cited above.

7. It should be the duty of the head of the particular administrative unit from which disclosure is being requested to determine the legitimacy of such a request. He must bear the responsibility of weighing the functional necessity of the request and the possible damage to the individual. In doubtful cases, the decision should be referred to higher administrative authority. Whenever appropriate, requests should be directed immediately to the Office of Student Affairs where comprehensive records are maintained and where adequate staff and policies are available for reply. Aside from official routine filing and reporting procedures, a record of evaluative use of files should be kept with each file, specifying by whom and when that file was used, including record of review by the student to whom it pertains (see suggested form appended). As noted under 4, confidential letters of evaluation specifically requested by a student, and intended from their inception for release to individuals or units outside the University, should be used only on those occasions directly requested by the student,

except when the student has signed an authorization for documents on file at a placement office to be sent to specified categories of recipients.

8. When disclosure of any file is forced by subpoena, the response of the University should be to take the maximum allowable time to respond, and the individual concerned should be notified in writing (requesting verification of notification) as quickly as possible as to the nature of the subpoena and of the intention to reply so that the individual will have the opportunity to react in his own behalf. Anyone receiving such a subpoena should immediately notify the Office of the President.

9. Privileged materials obtained from students in confidence (medical records, grant applications, etc.), while they may be retained in student files cannot be disclosed under any circumstances violating such privilege.

10. If unsolicited negative evaluative or accusatory material be directed into the file of a student, such material must be carefully evaluated by the recipient administrator and retained only under extreme circumstances. Such information normally should be maintained apart from regular files and should be released to no one; it should either be returned to the sender with an explanation of why it is not being retained or else reviewed by the student involved if that

does not violate the rights of the sender. The person retaining such material, in the absence of the student review, should do so on the understanding that he bears the onus should the individual student ultimately be damaged by accidental misuse of the information.

11. Administrative units within the University should develop specific written policies which are consistent with these general principles. They should also provide for regular review of such policies to insure that they are effective and timely in the light of changing conditions. Units desiring special counsel in establishing reasonable policies should request assistance from the Civil Liberties Board of the Senate Assembly.

APPENDIX F

DRAFT OF POLICIES GOVERNING STUDENT RECORDS AS PROVISIONALLY APPROVED BY THE STUDENT RELATIONS COMMITTEE, 1968

THE UNIVERSITY OF MICHIGAN

OFFICE OF THE VICE PRESIDENT
FOR STUDENT AFFAIRS

DRAFT OF POLICIES GOVERNING STUDENT RECORDS[1] AS PROVISIONALLY APPROVED BY THE STUDENT RELATIONS COMMITTEE
October 3, 1968

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[1]Student Records in the context of this document refers to all files retained by the Office of Student Affairs and its subdivisions.

ARTICLE 1, PURPOSE OF STUDENT RECORDS

A. The Office of Student Affairs maintains records for students in order to aid students in their progress through the University and afterwards as alumni. A student has the right to see all his non-medical records.

B. The Office of the Vice President for Student Affairs and all departments and staff assembled thereunder (hereinafter referred to as Student Affairs) affirms its commitment to honor the individual's expectation, whether student or alumnus, that personal, academic and counseling records be handled in a considerate and professional manner, securing and protecting him in his privacy, and pursuant to this commitment, Student Affairs further affirms it shall be guided by policies as hereinafter put forward.

C. For the Bureau of Psychological Services (counseling) and for the Health Service the right of the student to see the material placed in files is eliminated. However, as far as subsequent disclosure of material in the files is concerned, restrictions upon this are not only those listed but must also be consistent with general ethics of the health professions and established procedures in other hospital units of the University.

ARTICLE II, DISCRETION TO WITHHOLD INFORMATION

Student Affairs reserves the right to withhold information when in its judgment the interests and welfare of the individual, the University, or both, are thereby safeguarded against unwarrantable inquiry.

ARTICLE III, DISCLOSURE OF INFORMATION

Information in a student's/alumnus' record shall not be released, written, orally, or in any other form, without the consent of the person who is being served by the file, namely the student or alumnus.

A. Implicit consent.--It is reasonable to expect the student would give his consent to certain information being given to certain persons or groups. These cases are given in the first Appendix. All cases not explicitly covered in the Appendix are governed by Clause B. Any student/alumnus may, at any time, remove this consent for any or all items of information. In such a case, this information is not to be released to anyone outside Student Affairs without that student's/alumnus' explicit written permission. This ban on the release of information is to be valid until explicitly rescinded in writing by the student/alumnus. In order to implement this section, we recommend provision be made for a "Privacy Box" on the University registrationnaire.

B. Explicit consent.--In all cases not listed in Appendix 1 and in all cases whatsoever for students requesting privacy, Student Affairs

shall not release information unless the student explicitly requests such in writing. In no case, however, shall information be transmitted or disclosed which might tend to discredit or damage an individual in his life and career without his express knowledge and written consent. Further, no information other than that requested shall be disclosed.

C. In Appendix 1 the kinds of information retained by the Office of Student Affairs have been listed. In designating which information may be made available to whom, the committee has been guided by no rule other than common sense and experience. Therefore, these designations shall be reviewed periodically by a joint committee of students, faculty, and administrators; and amended in light of their wisdom and experience, by common consent of all three groups.

ARTICLE IV, PROCEDURE UPON RECEIPT OF A SUBPOENA

Information from Student Affairs shall not be automatically released upon receipt of a subpoena issued by a legislative body or court of competent jurisdiction. Upon receipt of such subpoena, Student Affairs shall:

1. Make every reasonable effort to notify immediately the person or persons affected by the subpoena and confirm such notification by letter.
2. Notify the Civil Liberties Board of the University.
3. Decide in consultation with the persons affected and appropriate officials of the University, whether to challenge the validity of the subpoena.

ARTICLE V, PROCEDURE UPON REQUEST OF INFORMATION BY AN INVESTIGATORY AGENCY

A. Whenever a local, state or federal police or investigatory agency requests any information about a student/alumnus, Student Affairs shall immediately notify such student/alumnus in writing that such a request has been made, unless written evidence shows the investigation has been initiated by the student/alumnus for employment purposes.

B. No information shall be provided to investigatory agencies unless inquiry is made in writing, and no information shall be provided except in writing. No information shall be given which relates to the student's loyalty and patriotism, his political, religious and moral outlook, or his private life.

ARTICLE VI, AUTHORIZATION

A. All inquiries about students directed to Student Affairs, whether from inside the University or from outside, shall be answered only by the Vice President for Student Affairs or persons on the staff of Student Affairs specifically named and authorized by the Vice

President. Disclosure of information by authorized staff members of Student Affairs shall be governed by the limitations on disclosure of records set out in this document.

B. Professional staff members of Student Affairs shall not be restricted in providing personal references for individual students/alumni whom they know or have known personally, provided they have been asked to do so by the individual about whom the inquiry is made.

ARTICLE VII, ACCESS TO STUDENT RECORDS

A. Only those professional staff and other clerical staff specifically named by the Vice President or the Directors of the nine departments of Student Affairs shall have direct access to student records, and such list shall be prepared at least twice each calendar year, or more often, at the discretion of the Vice President.

B. In no case shall a record be removed from Student Affairs by any person or for any reason except upon written approval of the Vice President.

C. No student shall have direct access to the record of another student except as the former may be employed by Student Affairs, and he shall be subject to such rules and supervision as preserve the confidentiality of records.

D. A student shall have the right to add information to his file at any time.

ARTICLE VIII, DESTRUCTION OF STUDENT RECORDS

A. Annually, all basic records of alumni whose last date of enrollment in the University occurred five years earlier shall be microfilmed. All information other than the basic record shall be destroyed.

B. The (student initiated) Placement File and all medical records are exempt from clause A of this Article.

ARTICLE IX, IMPLEMENTATION

Student Affairs shall give effect to the foregoing policies when the Vice President for Student Affairs, the Student Relations Committee of SACUA, Student Government Council and Graduate Assembly give them approval.

ARTICLE X, AMENDMENT

This document may be amended by common consent of representatives of the four aforementioned bodies (Article X, above).

Appendix 1
University of Michigan
Student Affairs
Disclosure of Information Chart

The kinds of information retained by the Office of Student Affairs have been listed. In designating which information may be made available to whom, the committee has been guided by no rule other than common sense and experience. Therefore, these designations should be reviewed periodically by a joint committee of students, faculty, and administrators; and amended in light of their wisdom and experience by common consent.

A. Implicit consent for full public disclosure of these items may be assumed under Article III-A. It covers items which are customarily published in the University of Michigan Student Directory, the University of Michigan Directory of Officers, Faculty, staff and Associated Organizations, and the Ann Arbor-Ypsilanti Area Telephone Directory (See Disclosure of Information Chart, Column A).

   This information may be disclosed to anyone.

B. Implicit consent for limited or qualified disclosure of these items may be assumed under Article III-A as modified by Article II. It covers items which are customarily furnished by individuals as identification or as past achievements generally published in laudatory biographical news releases (See Disclosure of Information Chart, Column B).

   This information may be disclosed to an employer or prospective employer, to an official of a sister institution or to a community service association needing the data to inform students of services. In the case of foreign students, this information may be disclosed by the Director of the International Center to Regulation 8 CFR P 214.3 (given in Appendix II). Disclosure under this paragraph shall not include a release of information to commercial organizations for solicitation purposes.

C. This information shall not be released to anyone without the student's express written approval (See Disclosure of Information Chart, Column C).

APPENDIX I
DISCLOSURE OF INFORMATION CHART
UNIVERSITY OF MICHIGAN
STUDENT AFFAIRS

INFORMATION CATEGORY	A Implicit Consent Full Disclosure	B Implicit Consent Limited Disclosure	C Explicit Consent CONFIDENTIAL	INFORMATION RELEASED TO
PERSONAL				
Name	X			Anyone
Local Address and Phone No.	X			
Home Address	X			
Class	X			
School	X			
ACADEMIC				
U of M Degree	X			
Date Degree Conferred	X			
FINANCIAL				
Scholarship Recipient	X			Anyone
PERSONAL				
Sex	X			
Marital Status	X			
No. of Dependents		X		
Country of Citizenship		X		
Date of Birth		X		

INFORMATION CATEGORY	A Full Disclosure	B Limited Disclosure	C CONFIDENTIAL	INFORMATION RELEASED TO
ACADEMIC				Employer, Official of Sister Institution
Other Institutions Attended		X		Immigration
Dates of UM Attendance		X		Service, Health Dept. Community Services
HEALTH				
Confinement in H.S. Infirmary: (Illnesses which must be reported to Health Dept. or Police)		X		
PERSONAL				
Name of Parent, Guardian, Spouse			X	No One except with Student's express written consent
Home Phone Number			X	
Photo			X	
Religion			X	
Name & Address of Friend			X	
Campus Leadership			X	
Signature			X	
ACADEMIC				
Admissions Application			X	
Col. Bd. OAIS, AEC Test			X	
FINANCIAL				
Amount of Assistance			X	
Financial Records			X	

	A	B	C	
Amount of Assistance			x	
Financial Records			x	
HEALTH				

APPENDIX II

Relevant Statutes

Michigan 8 27A. 2165 School teachers and employees not to disclose communications from students or other juveniles: consent.

Sec. 2165

No teacher, guidance officer, school executive or other professional person engaged in character building in the public schools or in any other educational institution, including any clerical worker of such schools and institutions, who maintain records of student's behavior or who has such records in his custody, or who receives in confidence communications from students or other juveniles, shall be allowed in any proceedings, civil or criminal, in any court of this state, to disclose any information obtained by him from such records or such communications; not to produce such records or transcript thereof, except that any such testimony may be given, with the consent of the person so confiding or to whom such records relate, if such person is 21 years of age or over, or, if such person is a minor, with the consent of his or her parent or legal guardian (CL '48 8 600.2165).

Michigan Statues Annotated (Vol. 21)

Federal

8 CFR (Code of Federal Regulations). Section 214.3, p. 47 (Revised as of January 1, 1967)

Reporting requirements. - Each approved school, upon receiving Service notification of arrival in the United States of a nonimmigrant student destined to that school, or Service notification of permission to attend the school, shall submit immediately to the office of the Service having jurisdiction over the area in which the institution is located a report, in writing, if the student fails to register personally at the school within 60 days of the time he was expected to do so. An immediate report shall also be made in the case of each nonimmigrant student who fails to carry a full course of study, fails to attend classes to the extent normally required, or terminates his attendance at the institution. The report shall be made on Form 1-20B.*

* "Service" refers to the Immigration and Naturalization Service.

The Director of the International Center is charged with making these reports for the University of Michigan and is given permission to disclose these specific points of information to the Immigration and Naturalization Service.

7/14/70

APPENDIX G

REPORT ON RECORDS MANAGEMENT ACTIVITIES, 1970

December 31, 1970

TO: Dr. Ernest R. Zimmermann

FROM: Linz C. Brown LCB

SUBJECT: Report on Records Management Activities

Attached is a brief report summarizing the results of selected records management activities in the Office of the Registrar for the period March 24 to November 24, 1970. [1]

The presentation is divided into three major sections: tangible gains, intangible gains and potential gains. The first section includes only items that could be documented with a reasonable degree of accuracy. The second section describes some of the more subtle gains that could not be documented without considerable expense. If a cost analysis could have been run on the items in this section, perhaps the gains would have exceeded those of the first section. The final section utilizes selected cost figures as a baseline for predicting savings for the next three years. It is assumed that new filing equipment will not be needed during this period.

When reflecting upon this report, it is important that the reader keep three particulars in mind. First, the project was conducted on a part-time basis. Officially, a total of 468 hours was devoted to the project. The total investment in salary was approximately $2260. Second, the investment in time and money for the stated period included the development, testing and writing of a new records disposition program. Had this been an on-going program, the entire process could have been completed in two or three weeks. Third, the gains described on the following pages represent only one aspect of a total records management program. Other areas, such as the creation (forms management) and

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[1] This report does not include the Statistical Section of the Office of the Registrar.

maintenance (filing systems) of records, were not considered. Implementation of these two areas would have added significantly to the amount of tangible, intangible and potential gains.

I. TANGIBLE GAINS

Equipment Released

Item	Quantity	Est. Potential Income from Resale [2]	Est. Cost
Four-drawer file cabinet	18	$621.00	$1242.00
Five-drawer file cabinet	1	43.50	87.00
Double pedestal desk	1	74.50	149.00
Sub-total	20	$739.00	$1478.00

Equipment Ready for Assignment

Four-shelf metal bookcase	11	$459.25	$918.50
Five-drawer file cabinet	5	217.50	435.00
Four-drawer file cabinet	11	379.50	759.00
Three-drawer file cabinet	2	42.40	84.80
Ten-drawer card file	1	46.80	93.60
Twenty-two-drawer card file	1	165.30	330.60
Twenty-drawer card file	1	87.00	174.00
Double pedestal desk	2	199.00	398.00
Sub-total	34	$1596.75	$3193.50

Equipment Soon To Be Ready for Reassignment [3]

Four-drawer file cabinet	17	$586.50	$1173.00
Five-drawer file cabinet	9	391.50	783.00
Six-drawer file cabinet	1	54.00	108.00
Sub-total	27	$1032.00	$2064.00

Equipment Reassigned Within Office

Twenty-two-drawer card file	1	$165.30	$330.60
Three-drawer, lock and fire resistent file cabinet	1	98.25	196.50 [4]
Sub-total	2	$263.55	$527.10

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[2] Estimates of resale value provided by Property Control.

[3] This equipment contains records that are in the process of being microfilmed.

[4] Reassigned for the protection of vital records.

Other Tangible Gains

		Est. Cost (Con't.)	
Savings in part-time help to interfile and post extension records (based on 1969-70 payroll figures)	370 hours @ 2.45	$906.50	
Savings in the binding of applications and grade sheets (based on 9-11-68 to 9-2-69 cost figures supplied by Binding Department)		183.61	
Savings of 249 sq. ft. in office space, based on a leasing rate of $4.00 per sq. ft. (Estimated rate supplied by Purchasing Department - contracts and leasing section.)		996.00	
Saving in delivery charges on equipment		747.00	
Sub-total		$2833.11	
Total Tangible Gain (at cost)			$10,095.71 [5]
Less Investment in Salary			2,260.00
Net Tangible Gain			$7,835.71

[5] Estimates of equipment and delivery costs were provided by the Purchasing Department.

II. INTANGIBLE GAINS

Intangible gains can be divided into the following areas:

Security of Vital Records

The process of analyzing and appraising records helped to focus attention on this group of essential records. A vault on the main floor of the Office was designated as a "records center," and a master plan was developed for the storage and protection of these records.

In one instance, a supervisor was keeping the only official copy of graduation lists in a desk located near a ground-level window. The supervisor wanted to keep the records near her operation; so, a fire-resistent safe with a combination lock was transferred to the location to provide better protection. As an additional precaution, a copy of the lists was prepared and deposited in the records center.

Efficiency in Record-Handling.

A drastic reduction in the volume of records maintained by the Office increased efficiency in a number of ways. First, it minimized, and in some cases eliminated, the duplication of records. Second, the weeding out of unnecessary records made it much easier to file and inter-file records. Third, the removal of "valueless" records from the files facilitated retrieval. Filing space was reclaimed and the finding time was reduced.

Protection of Records of Value

One of the primary objectives of the disposition program was to "safeguard the interests of the University and its component parts by making sure that all legal, historical, administrative, research, fiscal and other values have been carefully considered." An earnest attempt was made to fulfill this objective. Thoughtful consideration was given to a number of the records listed on the retention schedule because of the values they represented. One example is residency correspondence.

Because of legal implications, this group of records will be stored and protected beyond the period of administrative usefulness.

Released Administrative Time

Approved retention schedules take the guesswork out of records disposition. They help to free administrators from daily operations, and to eliminate repetitive and hastily-made decisions concerning records. This is accomplished primarily by the schedules which give secretaries and clerks authority to act within prescribed limits and by the operating procedures which spell out the details of implementation. The retention schedules developed for the Office of the Registrar can be maintained with a minimum of effort.

Coordination Within Office

Improved coordination was one of the more profound results of the project. In the words of Mr. Douglas Woolley, Associate Registrar, the program created a fresh "awareness of relationships" within the Office. Personnel were called upon not only to analyze and question what they were doing with the records in their possession, but also to meet and talk with personnel from other sections to analyze inter-relationships. the result was a better understanding of interdependent activities, increased cooperation, elimination of unnecessary tasks, reduction in duplication and a more harmonious operation.

Effective Use of Equipment

The misuse of filing equipment seems to be a common practice in university offices. In the Office of the Registrar, for example, filing equipment was used to store office supplies, office equipment,

intra-campus mail envelopes and sundry personal items. Another aspect of the same problem was evidenced by the use of typewriter and utility stands as shelving space for records, and the use of a double pedestal desk as a stand for a microfilm reader.

When situations such as those above were found, the following steps were taken: (1) unsuitable items were removed; (2) equipment was reassigned with the idea that it be used for the purposes intended.

III. POTENTIAL GAINS FOR THREE-YEAR PERIOD

	Est. Cost
Savings resulting from the establishment of retention periods and the destruction of "valueless" inactive records. Purchases of filing equipment for the years 1967, 1968 and 1969 were used as the basis for prediction. If the schedules are maintained, it is assumed that there will be no need for additional purchases of filing equipment for the next three years.	$15,412.25
Savings resulting from the inexpensive storage of "valuable" inactive records. By using standard corrugated containers and standard steel shelving, the equivalent of eighteen, four-drawer metal cabinets can be stored in a 2 1/2' wide x 7' long x 9' high area at a cost of $141.48. This compares with $1242 for metal cabinets. The difference between these two figures is the potential savings.	1,100.52
Savings made by not binding applications and grade sheets	550.83
Savings of personnel time in the filing of Extension records	2,719.50[6]
Savings of office space. This is based on 249 sq. ft. at a leasing rate of $4.00 per sq. ft. for three years.	2,988.00
Total Potential Gains for Three-Year Period	$22,771.10

[6] This figure serves only to highlight possible savings. All areas of the Office reduced their holdings and improved their filing practices, but the savings could not be documented as easily as this particular case.

APPENDIX H

SPECIAL RETENTION SCHEDULES DEVELOPED FOR THE OFFICE OF REGISTRAR

RETENTION SCHEDULE CODE

CO - current only

D - destroy after number of terms or years indicated

M - microfilm after number of terms or years indicated. Hard copy is destroyed unless otherwise indicated.

P - permanent

R - review after the number of years indicated.

T - transfer to designated records center after the number of terms or years indicated. T by itself suggests immediate transfer.

US - until superseded

Numerals indicate years unless otherwise indicated.

Record Copy is the official copy for retention purposes.

Cut-Off Period is the point in time when a break occurs in the filing sequence of a records series.

Record Center is the designated location for storing inactive and vital records.

RETENTION SCHEDULE R-1

Records

Item No.	Record Copy	Cut-Off Period	Records Series Title	Office	Record Center	Micro-film
1	no	cal yr	Admission slips	1-D		
2	no	term	Course listings	1-D		
3	yes	term	Course reports (grade sheets)	2-M		P
4	no	term	Degree lists	1-D		
5	no	term	Directed teaching lists; teacher certifications	1-D		
6	yes	term	Election cards; drops & add; applied music lists	1-M		P
7	yes	cal yr	General Register	5-T	P	
8	no	term	Registrationnaires	2-D		
9	no	term	Scholarships and fellowships lists; dean's list for Nursing	1-D		
10	yes	term	Student folders	M-contents (phasing out)		P
11	yes	term	Student academic record	1 after end of residence, then transfer to Transcripts Office		

RETENTION SCHEDULE R-2

Registration and Advance Classification

Item No.	Record Copy	Cut-Off Period	Records Series Title	Office	Record Center	Micro-film
1	yes	term	Advance classification:			
			Enrollment reports	2-D		
			Limits (class)	2-D		
			Additions and deletions	1 term-D		
			Orientation	1 term-D		
2	yes	term	Military service file (fee refunds)	4-D		
3	yes	term	Registration and classification files (unbound materials)	2-D		
4	yes	term	Registration information (bound office copies)	2-T	P	

RETENTION SCHEDULE R-3

Student Certification and Residency

Item No.	Record Copy	Cut-Off Period	Records Series Title	Office	Record Center	Micro-film
1	no	fis yr	Cash receipt tickets (deposits)	2-D		
2	yes	cal yr	Correspondence, name changes and duplicate diplomas	1-D		
3	yes	cal yr	Correspondence, residency	2-D	8	
4	no	term	Fee schedules	10-D		
5	yes	term	Graduation, final list as corrected	P	P	
6	no	term	Graduation: memos, schedules, and lists from recorders	2-D		
7	yes	cal yr	Lists sent (requests off-campus)	2-D		
8	yes	term	Master file: Registrationnaires Name change cards Diploma applications Fee changes Withdrawals Teaching fellows	5-M		P
9	no	term	Name change request	5-D		
10	no	cal yr	Releases on hold credits and hold credit trial balances	2-D		
11	yes	term	Selective Service:			
			Long form SS 109 and SS 103	2-D		
			Withdrawals	2-D		
			Information cards:			
			Current deck	2-D		
			Void deck	2-D		
			Degree deck	2-D		
			Blank deck	1-D		
			Orientation deck	1-D		
12	yes	term	Social Security:			
			Notice of cessation of full-time attendance	1-D		
			Certificates (only problem cases are retained)	Until cleared		

RETENTION SCHEDULE R-3

Student Certification and Residency

Item No.	Record Copy	Cut-Off Period	Records Series Title	Office	Record Center	Micro-film
13	yes	term	Student academic record	10-M	P*	P
14	no	term	Teaching fellows, appointment papers	2-D		
15	yes	fis yr	Transcript billing (requests on campus)	2-D		
16	yes	cal yr	Transcript requests, and no replies	2-D		
17	yes	term	Unclaimed diplomas	2-D		
18	yes	fis yr	Validating machine tapes and receipt books	1-M		6
19	yes	term	Veteran's Administration: Certificate of eligibility Certificate of enrollment Change of status Other cards and forms	3 after last term of enrollment		

*After microfilm printer system becomes functional, the hard copy will be destroyed.

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