

**A Model Records Management System for Texas Public Utilities: An Information
Science Tool for Public Managers**

by

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ABSTRACT

Introduction: The way in which agencies receive information changes daily as does the type of information they deal with. Whether it is on e-mail, flash drive, even paper, each tool an agency uses is considered to be a record. Public administration is no longer a “sit and wait field”. Many decisions require “on-demand” access to information and records. That need is magnified in a public utility given the variety of agencies, business and individual customers supported. Texas has specific requirements regarding how agencies manage information. Utility industrial standards and regulations make compliance efforts even more stringent. To address this issue, a preliminary model is needed for how an agency should manage its records. The goal of this project is to lay a framework for an effective records management program.

Purpose: The first purpose of this paper is to develop a model records management system for public utilities in Texas using relevant scholarly literature. Second, the model was evaluated by a pool of experts. Third, a revised model records management system based on expert feedback is developed.

Theory/Methodology: Focused interviews were conducted with 10 experts to determine whether or not the preliminary model was sound. Frequency distribution was used to quantify responses to those questions. Open-ended recommendations were also solicited to provide input in creating the revised model.

Findings: The existing model was largely comprehensive but needed the addition of two major components. The resulting model consists of the following components: System Design, Establishment of a Records Management Plan, Establishment of a Records Management Team, Inventory Management, Vital Records Management, Retention and Control Schedule Management, Disaster Planning and Recovery, and System Audit and Control. These components define an expanded and comprehensive model for agencies to use in creating their records management programs.

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AUTHOR'S NOTE

This research has been almost as much of a journey in self-discovery as a successful creation of a public utility records management program. Dr. Pat Shields, my research advisor, once said that “writing an ideal model helps you develop a sense of your analytical capabilities.” Now, as I end this research and you begin it, I can’t help but think about the analyst that I became; no doubt as a result of both the “method” and the “madness” involved in this Applied Research Project process. My hope is that, if you gain an understanding of my state of mind during the course of this research, it may just give you more of an appreciation for the role of public administrators. I am simply one link in a very large chain. I suspect that since you are reading this paper, you fit somewhere into that chain as well; and for that, you have my gratitude.

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Thanks for reading,

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CHAPTER 1 – INTRODUCTION

Public utility agencies need on-demand access to their records and information, whether, it is for business continuity or transparency in government through public information requests. That demand represents a need for a coherent system of organizing, cataloging and storing data. Records management has evolved as a self-aware field to answer that call. Trained professionals facilitate information management and ensure that agencies are in compliance with all legislative and industrial standards. However, records management systems vary in composition and proficiency. That variance may cause severe degradations in service delivery. Thus, there remains a need for a model system for public utility records management that will encompass compliance, inventory management, retention, and disaster recovery. A preliminary model will help ensure that regardless of the situation, public utilities will sustain effective operations and minimize interruptions in service.

Research Purpose

The first purpose of this paper is to develop a preliminary model records management system for public utilities in Texas using relevant scholarly literature. Second, this model will be presented to and evaluated by, a pool of experts. Third, based on expert feedback, a revised model records management system will be developed.

Record Management and the Traits of Agencies

One of the underlying objectives of this research is solidify the place of records management in the effective operation of an agency. The scholarly literature listed in this section discusses how records management is inherently linked with the qualities of modern government. The result is the ability of the agency to effectively meet citizen

demands. This section discusses how records management directly impacts open government; and also how it contributes to the efficient operation of an agency. These are two traits which determine how an agency will effectively deliver services.

Records Management and Agency Transparency

The definition of government increasingly includes open government.¹ Changes in public information legislation² have caused many agencies to formalize their own policies and procedures to address the public demand to information. Sharon Caudle (1990) conducted a study evaluating the priority of agencies as it relates to managing their information and resources relative to a pattern of scrutiny which they had been experiencing.

While the current focus remained on information technology management, particularly computerized data processing and communications, it was clear that management trends included better management of information itself as a resource. (1990, 521)

Modern public administration demands transparency. In an effort to support that initiative, records, particularly those dealing with financial and budget data must be readily available. How that information should be accessed and how it can be protected often clashes with the need for transparency. According to Kimberly Barata and Pipers Cain (2001, 248) “There is potential conflict between the objectives of providing efficient access on the one hand and supporting accountability on the other.” The link between records management and public finance is further solidified through the study of an

¹ More information on “open government” initiatives and access to data may be found in Chandler (1998).

² For more information on “open records” please see Texas Public Information Act.

agency's budget. In many cases, there are actual line items in an operating budget dedicated to maintaining agency financial records.³

Records Management and Agency Efficiency

Just as important as transparency in government is efficiency. In this case, the demand is not necessarily for information; but rather how agencies will implement cost-saving measures and still maintain agency operations. Timothy Sphere (2005) draws a parallel between readiness and effective records management. "Beyond risk management, with electronic records management (ERM) fully implemented an enterprise can realize positive benefits and real cost savings to the information management of essential business functions in the enterprise," (297). This is particularly important during times of disaster recovery.⁴

Records Management and the Real World

The need for records management programs to be implemented as standard operating procedures in any government agency is best evidenced by real-world specific examples of good and bad scenarios. Readers may be familiar with the large-scale examples of how poor records management ended in disaster for companies such as Enron.⁵ There are, however, other notable examples of how records management plays a role in the way agencies and companies do business. This section examines several scenarios of how records management practices impacted agency operations in a manner which gained national, and in some cases, international scrutiny.

³ Records management is included as part of budget allocation according to R. Allen and S. Schaivo-Campo (2004, 31). See section entitled "Accounting, reporting and external audit."

⁴ More information on societal trends toward risk management and disaster recovery is available in Tierney (1999) and Altemeyer (2004)

⁵ For more articles on Enron, please consult the New York Times Archive on Enron Corporation.

Records Management and Technology

The first scenario revisits the demand for information from governmental agencies. A recent article by Gautham Nagesh (2008) examines a rise in younger citizens seeking information online. “A recently released survey shows that Generation Y prefers to connect with government online in an interactive manner similar to the way they seek out news and other information,” (Nagesh 2008). The records management process (known online as Enterprise Content Management [ECM]) consolidates electronic information and streamlines access to the most requested databases. Those requests are then catalogued and evaluated to modify service and content delivery as demand changes. Although automated access to information is becoming a societal norm, many individuals are hesitant to put full faith and confidence in the “digital age”. Breaches of secure data cause consumer trust in the ECM process to plummet. A recent article in *Government Computer News* reported that although data breaches are on the rise across the board, they are actually down in the public sector.

Reported data breaches increased sharply in the first six months of 2008, jumping 69 percent compared to the same period last year, according to a study by the Identity Theft Resource Center (ITRC). But the percentage of breaches occurring in the government sector has dropped steadily in the past three years. (Jackson 2008)

Opinions on how to secure data are largely divided; but most research supports improvements in technology and process management. Records management addresses both. The U.S. State Department recently launched a hardware and software platform that exemplifies the fusion of technology and process management in their passport data system. Gautham Nagesh (2008) explains that the system stores massive amounts of personal data in order to minimize obstacles in the identity verification process. “The

system has a vast collection of data on Americans and contains records for about 127 million passport holders.” (Nagesh 2008). Much of the data in the system is confidential; so security is a major concern. With regard to what the agency is doing to prevent identity theft, the article reported that “Agencies are required to secure records under the 1974 Privacy Act and should be walled off from unauthorized access...”(Nagesh 2008).⁶ Records management plays an important role in facilitating information. It is even more powerful when fused with available technology.

Records Management and Disaster Recovery

Records management also plays an important role in an agency’s ability to deliver essential services during and after a disaster. Care must be taken to preserve those records which an organization considers essential for operation. In a recent article in the *DeMoines Register*, Melissa Walker (2008) examined how inadequate records management planning by local and state government offices led to considerable setbacks in recovery.

Wild weather across Iowa has played havoc with city operations big and small. Officials across the state still wait to see what condition their documents - those that record policymaking, as well as track what businesses have liquor licenses or cigarette permits, and whether residents bought a license for their pet or paid their property taxes - will be in once they return to government buildings. Some acknowledge service, particularly court proceedings in Linn County, will be affected while officials wait for files to be replaced, (Walker 2008).

While some agencies suffer because of improper planning, others avoid this pitfall by recognizing the hardships that their counterparts suffered and put contingency plans into place early. Gautham Nagesh (2008) explains that these organizations root their planning in policy. “A continuity of operations plan, or COOP, outlines steps that an agency will

⁶ For more information on identity protection, see “How to Prevent Identify Theft: 5 Things Everyone Should Know for Fraud Protection.” (Identity Theft Daily, 2008).

take in the event a disaster interrupts business. Continuity plans require agencies to designate functions as essential or nonessential,” (Nagesh 2008).

Agencies rely on those continuity plans to quickly return to normal operation after a disruption. According to Bruce Beaman and Becky Albin, (2008) the same classification system used to classify vital records for operation can be applied to disaster recovery plans as well.

“The nature of the business and its physical and social environment will influence the types of threats an organization might face. Once the threats are listed, they should be categorized according to their likely impact on various systems,” (Beaman and Albin 2008).

The continuity plan itself then becomes a vital record and is frequently referenced in other aspects of agency planning. In the public utility sector, disaster planning is essential in order to ensure that vital resources are not only available to the customers that the utility serves but to the organization itself.

Looking Ahead

This paper will explore records management’s role in the operation of public utilities. The “Introduction” (Chapter 1) provides an insight into how records management fits into governmental operation, as well as what can happen when mismanagement trumps proper planning. The goal of the “Setting” chapter (Chapter 2) is to lay a foundation for the rest of the project. This chapter provides an introduction to the field of records management and links it to the world of public utilities. “The Preliminary Model” (Chapter 3) discusses the first model used in the paper based solely on review of scholarly literature. Each component was tested against existing scholarly literature and a pool of experts to develop the revised model discussed later in the project. The “Methodology” chapter (Chapter 4) discusses the focused interview process,

frequency distribution for quantitative results reporting, and the measures taken to protect human subjects during the project. The “Results” chapter (Chapter 5) discusses the specific findings and outcomes explored during the focused interview and frequency distribution processes. Finally, the “Conclusion” chapter (Chapter 6) summarizes the entire Applied Research Project, presents the revised model for a public utility records management system, and discusses the limitations of this study and suggestion for future ones.

CHAPTER 2 – SETTING

Chapter Purpose

The purpose of this chapter is to introduce the field of records management. The chapter begins by giving a brief overview of the records management field; including its links to the information sciences and its evolution as a self-aware (meaning an independently-functioning and self-supporting) professional field. Next, the chapter examines federal, state and local legislation relevant to the field of records management in public agencies. Finally, the chapter discusses the role of the Texas State Library and Archives Commission (TSLAC) in the public utility records management process. TSLAC is the state agency charged with overseeing records and information management for Texas state and local government entities.

Introduction to Records Management

The preservation of data is an essential task for any agency, corporation or organization. Successfully consolidating and tracking information systems allow an individual or group to access needed records with ease and efficiency. The purpose of a records management program is to facilitate access and minimize data-related obstacles that interfere with business or agency operations.⁷ Records management programs prove most valuable when an organization is dealing with pressing matters such as natural disasters, legal issues, audits and public information requests. The roles of archivists and records managers are inherently linked. In many instances, an archivist shepherds the overall process and is most familiar with the purpose of a records management program. According to Jay Atherton (1971) “the ultimate purpose of records management is the

⁷ More information on data-related obstacles to effective business operations may be found in Khanna and Rivkin (2001).

permanent preservation of ‘historically valuable’ material in the archives,” (1971, 44). The archivist (or records manager) is integral in ensuring the continuity of information despite any natural disaster or other operational obstacle. Atherton goes on to professionalize the records manager as “an archivist who has become a general practitioner,” (Atherton 1971, 44). Finally, the author fuses the management perspective of the archival operations by characterizing it as a system. The goal of this article is to further define the rules by which that system should operate. Atherton (1971, 44) sets clear boundaries in defining the different components of the system. He argues that there should be a logical progression of data from immediate access of vital information to classification of secondary data. Once that information has been catalogued appropriately, the remaining information is stored in the event that it is needed as ancillary reference material. In addition to his analysis of the archival system, Atherton makes an important delineation between rudimentary system operations and effective management. He continues by saying that the system should “concentrate on efficient administration of current records, ensure systematic disposition procedures, and what remains is archives,” (Atherton 1971, 44). This article was written for *Management Quarterly*, thus showing the reason Atherton chose to highlight the administrative system component.

Over thirty years later, Maphalane Makura explores the purpose of records management from a continuity perspective rather than an archival one. She explains that “the main purpose of records management is to manage and control the flow of records with the necessary information within an organization,” (Makura 2005, 22).⁸ Both

⁸ This citation is taken from a thesis that Makura did on electronic records management in a service organization, which is closely related to the focus of this applied research project.

Atherton and Makura's research focus on information management processes but the difference in perspective may have to do with the time periods in which they were written; the late 20th and the early 21st centuries respectively. Further, it is evident that emerging technology played a significant role in Makura's research; perhaps largely due to the type of hardware and software available. Data storage during the 1970's was done mostly on microfilm. Experts within the field argue that this is still the preferred method for storing information with permanent retention needs.⁹ Makura's research was conducted much more recently, focusing on the elements of electronic data storage utilizing backup servers and imaging software. Despite the differences in technology, the need for rapid data access and proper storage procedures is a commonality in both of these research works.

The existing literature defines the purpose of records management programs from an archival and continuity perspective. Alan Gilchrest (2006) expanded upon the work of Maphalane Makura and presents a third perspective that asserts that records management is also important for ensuring control schedule accountability.¹⁰ Gilchrest argued that the records management process was designed "to keep the chronological stories of transactions and other activities in order to meet the demands of accountability and to impose retention and disposal schedules," (2006, 25).

Legislation Relevant to Management of Public Records

Legislation guiding management of public records exists at all levels of government. This legislation primarily covers retention, storage and disposition of

⁹ This was an opinion recently discussed at a records management training session conducted by the City of Austin. No printed reference is available.

¹⁰ Control schedules refer to mandated schedules for retention and disposal. More information on control schedules is available via the Texas State Library & Archives Commission website at <http://www.tsl.state.tx.us/slrml/>.

information. The Federal Records Act of 1950 (FRA) mandates the use of retention and control schedules.¹¹ According to the FRA¹²,

“Record schedules are mandatory instructions of what to do with records (and non-record materials) [that are] no longer needed for current Government business. The records schedules indicate how long a document must be kept before it is transferred to a Federal Records Center, destroyed or transferred to NARA[National Archives and Records Administration] for permanent preservation,” (DOE 2008).

In the public utility field, these types of records might include customer information databases, personnel, financial or technical records. Min Yuan-Cheng (2008) classified technical records as “spatial data such as road and circuit maps...and construction...” (2008, 510).

Texas Local Government Records Act of 1989 (LGRA) (Part C) mandates the use of retention and control schedules in all local government agencies. “On or before January 4, 1999, the records management officer shall prepare and file with the director and librarian...a records control schedule listing the following records and establishing a retention period for each as provided by Section 203.042,” (Texas Local Government Code Annotated §203.041(a)).¹³

The final piece of common legislation governing records management occurs at the local level. Local ordinances have an impact on public utility records management only if the utility is municipally owned. For example, Austin Energy and Austin Water Utility are two utilities that are departments of the City of Austin; thus they are subject to ordinances prescribed by the City Code. Chapter 2-11 of the City Code governs records

¹¹ The terms “retention schedule” and “control schedule” may be used interchangeably.

¹² The entire text of the Federal Records Act of 1950 may be accessed by visiting http://www.access.gpo.gov/uscode/title44/chapter33_.html

¹³ The entire text of the LGRA may be found by visiting <http://www.tsl.state.tx.us/slrm/recordspubs/lgbulld.html>

management practices for all City departments.¹⁴ The Code gives the City Records Management Officer the authority to govern the retention, storage and disposition of all City records. Since the municipal utilities are owned by the City, all utility records are also City records; and are thus subject to the same code.

Records Management Regulatory Agencies

Each level of government has an agency responsible for coordinating records management practices for its jurisdiction. At the federal level, the National Archives and Records Administration (NARA) governs management of all federal records.¹⁵ NARA's jurisdiction also extends to any state or local records which may be used by a federal agency or in response to federal mandate. For example, if a local public utility is undergoing review by the Environmental Protection Agency (EPA), records subject to that review fall under NARA guidelines.

In Texas, management of all state and local records is governed by the Texas State Library and Archive Commission (TSLAC).¹⁶ TSLAC publishes the records control schedules for use by all governmental agencies in Texas. When a state or local government agency prepares a control schedule, TSLAC reviews it in full before approving it for use. Once the schedule is approved, it becomes a legal document and is subject to the provisions of the Local Government Records Act.

If a public utility is locally owned, then the jurisdiction assigns a department the responsibility of issuing further directives on management of its records. Local public

¹⁴ The complete text of the City of Austin Code may be found at [http://www.amlegal.com/nxt/gateway.dll/Texas/austin/thecodeofthecityofaustintexas?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:austin_tx\\$anc=](http://www.amlegal.com/nxt/gateway.dll/Texas/austin/thecodeofthecityofaustintexas?f=templates$fn=default.htm$3.0$vid=amlegal:austin_tx$anc=)

¹⁵ NARA's website may be found at <http://www.archives.gov>.

¹⁶ TSLAC has a division that governs state and local records management. Their website address is <http://www.tsl.state.tx.us/slrn>.

utilities which are municipally owned fall under the records management standards set forth by the City Clerk or Secretary, depending on the agency structure. Again using the examples of Austin Energy and Austin Water Utility, the Office of the City Clerk (OCC) of Austin has a Records Management Services section. The City Clerk functions as the Records Management Officer and, in turn, appoints a City Records Manager with a staff of employees supporting various departments, including utilities.¹⁷

Chapter Summary

Records Management is an independent field with trained practitioners who support organizations in every field. In the public sector, records management practices are governed by several layers of legislation and regulation. In addition, each level of government employs an agency responsible for directing how its information and records will be managed. Public utilities may fall under one or more of these agencies, depending upon the jurisdiction they serve. The records those utilities manage are in common with companies in the private sector; however the rules governing private records are quite different. Tighter regulations and layered bureaucracy require more stringent review and compliance procedures for records management in public utilities. Thus, a system is necessary to organize how the management process can be adapted to suit the needs of a local utility; no matter the size, type or location. In the next chapter, a preliminary model for managing public utility records is presented. The components contained in the model are drawn from a variety of perspectives, all with the goal of balancing cost efficiency, accessibility and ease of use.

¹⁷ Utilities that are regional, such as the Lower Colorado River Authority, have their own internal records management departments, usually falling under Legal Services or Human Resources.

CHAPTER 3 – THE PRELIMINARY MODEL

Chapter Purpose

The purpose of this chapter is to outline the essential components of a model records management system. The model is organized according to a coherent conceptual framework.¹⁸ A preliminary model for a records management program that could be used by Texas public utilities includes six key components. The first component discusses how the records management system itself is designed. The elements of this component include how records and jurisdictions are defined, issues regarding compliance with regulatory agencies and jurisdictional rules. The second component deals with establishing a records management plan. The plan must contain several elements which are compliant with jurisdictional regulations.¹⁹ The applicability of a plan to local utilities is explained in the model. The third component of the preliminary model discusses the composition and establishment of a records management team. The members of this team include Records Managers, Specialists, and Contacts. The training requirements for the team are also outlined in this section. The fourth component of the preliminary model deals with Records Control Schedules.²⁰ The discussion of this component includes how a schedule is created, what role regulatory agencies play in the schedule process, the approval and adoption process, and how control schedules are different from records indexes and registries. The fifth component of the preliminary model is Inventory Management. Accurate records inventories are essential for an agency to know what information is on hand. The elements of this component include

¹⁸ For more information on developing a good conceptual framework, see “Pragmatism as a Philosophy of Science: A Tool for Public Administration” by Dr Patricia M. Shields.

¹⁹ For more information on composition, see Austin Energy’s Records Management Plan in Appendix 1. For full disclosure, the Austin Energy Records Management Plan was authored by Dustin McLemore also.

²⁰ Retention schedules and records control schedules refer to the same document.

inventory scheduling and preparation, prioritization and timeliness, reconciliation, inventory control and post-inventory processing. The final component of the preliminary model discusses how vital records are managed. In this section, topics include the identification process for vital records, delineation between vital and operational records, prioritization, storage and preservation. All of these components together represent an initial system for developing records management practices in a public utility.

System Design

Records management programs vary according to the size and mission of the organizations they serve, however, certain elements are common to all systems regardless of the utilizing agency. A records management system controls how the entire process in subsequent components will be developed. The system itself must be developed in a logical sequence in order to avoid interruptions in process management or utility service delivery. According to Jonathan Eberhart (1967), an effective system should be easy to understand. “It’s fine to put information into a [system]; but...[users] shouldn’t have to crawl after it,” (1967, 19).²¹ In a public utility records management system, the critical elements include industry compliance, utilization by a certain jurisdiction, compliance with that jurisdiction’s records management standards, and the necessity for adoption and approval of the program. The components of this section’s conceptual framework are relevant to common themes within governmental records management and archival programs.²² The System Design component serves as the cornerstone for the rest of the preliminary model. If these elements are not clearly defined it would be difficult to examine the rest of the system in great detail.

²¹ For more information on system design and analysis, refer to Jacquez and Simon (1993).

²² Archival is a dispositional component of the records management process.

Definition of Records

The first step in creating a preliminary records management system is to firmly define what does or does not constitute a record. Definitions vary between state and local agencies. In Texas, the Texas Local Government Records Act specifically outlines how local records will be classified.²³

“Local government record” means any document, paper, letter, book, map, photograph, sound or video recording, microfilm, magnetic tape, electronic medium, or other information recording medium, regardless of physical form or characteristic and regardless of whether public access to it is open or restricted under the laws of the state, created or received by a local government or any of its officers or employees pursuant to law, including an ordinance, or in the transaction of public business. (Tex. Loc. Gov’t Code Annotated §201 Vernon 2008)

Analysis reveals that this definition not only takes content and purpose into account, but also the media on which the record is stored. Local government record definitions are purposefully specific in order to account for all possible contingencies.

Review of scholarly literature indicates that the reality of defining a record may be difficult. M. Zawiyah et al (1998, 95) state that “the definition of a record changes as it evolves.” Records have a variety of uses and thus the meaning may change as those practices are added or discontinued.²⁴

Compliance with Regulatory Agencies

All state and local agencies, including public utilities, are required to conform to the records management standards set forth by the Texas State Library and Archive Commission (TSLAC). That agency’s standards govern all public records including standards for retention and review. Depending upon the utility’s jurisdictional

²³ The Local Government Records Act also defines what documents are not considered records. This list is available at <http://www.tsl.state.tx.us/slr/recordspubs/lgbulld.html#201003>.

²⁴ For more information on classifying records see Copas and Hilton (1990).

designation, the records management system falls under a certain TLSAC compliance office, either state or local. However virtually all public utilities fall under the local government records section of TSLAC. This office provides support to local government agencies on retention schedule creation, records management strategies, disaster recovery and archival. Records themselves are vital to gauge an organization's compliance with regulatory guidelines. Among utilities, those requirements become even more stringent. "Increasingly, regulated industries keep comprehensive records...the data and reports showing compliance with regulatory needs must be robust and come from an unimpeachable source." (Ambrose 2008, 145).

Jurisdictional Designation

Public utilities in Texas have a certain jurisdictional designation depending upon the area they serve. Municipal utilities in Texas are subject to the Texas Local Government Code and city ordinances created as a result of compliance with said code. Some municipal utilities serve multiple local jurisdictions. This is most prevalent when systems are covered by extra-territorial jurisdiction (ETJ) adjustment. This is the case with Austin Energy. The utility serves the majority of Travis County and portions of Williamson County through an ETJ adjustment.²⁵ Other public utilities have independent jurisdictional authority but serve larger regional areas. Examples of these types of utilities include Pedernales Electric Cooperative (PEC) and the Lower Colorado River Authority (LCRA).²⁶ Although electric cooperatives are member-owned, they are still accountable

²⁵ For more information on the City of Austin's ETJ adjustment, please visit http://www.ci.austin.tx.us/annexation/etj_adjust.htm

²⁶ For more information on electric cooperatives, see Ellis (1982).

to governmental regulations regarding funding and management of information. Thus, the same records management standards are applicable.²⁷

Jurisdictional Compliance

An essential component of system design is a utility's compliance with the jurisdiction it serves. In Texas, public utilities serve various jurisdictions and thus have multiple sets of standards to which they must adhere. Pedernales Electric Cooperative is member-owned and thus covered by an independent board or directors. The Lower Colorado River Authority (LCRA) is a supporting jurisdictional authority that supplies power and other resources to other areas in Central Texas. Since the LCRA supports multiple utilities, some of its policies and procedures supersede that of more local public utilities but all of its standards coincide with those set forth by the Texas State Library and Archives Commission.

In certain instances some public utilities may share territory with private providers such as Reliant or TXU. In such cases, the private utilities are responsible to industry, federal, state and local compliance. In cases where jurisdictional gaps exist and no state standard governs a particular area, local utilities should consider industry standards such as the Electric Reliability Council of Texas (ERCOT)²⁸ and the International Organization for Standardization (ISO).²⁹ Certain aspects of a public utility's operation are governed by these organizational standards depending upon whether the utility engages in Energy Market Operations. ISO is responsible for regulating compliance in the private market standards of all public utilities and has

²⁷ Pedernales Electric Cooperative was recently summoned to testify before congress because of suspected improper funding and record keeping practices. Please consult Grisales (2008).

²⁸ For more information on ERCOT, please visit <http://www.ercot.com/>.

²⁹ For more information on ISO, please visit <http://www.iso.org>.

separate records management standards to which jurisdictions must adhere, in addition to federal and state standards. There are no public utilities in Texas that are state owned, thus none fall under the State Records Management office of TSLAC.

The role of jurisdictional compliance in a records management system is solidified in the analysis of relevant literature. According to Diane Bedford and Jeff Morelli (2006, 169) “...it is now always appropriate for an organization to implement an [E]DRMS ([Electronic] Document and Records Management System) in order to achieve compliance.”³⁰

Establishment of a Records Management Plan

In order for a records management system to function effectively within a public utility, a plan must be designed that coordinates the operation of that system. A records management plan is a centralized document that outlines a utility’s set of standard operating procedures (SOP) for compliance, records management authority, inventory, and disaster recovery.^{31,32}

Plan Composition

In all Texas local agencies, establishment of the plan and its composition is mandated by the Local Government Records Act of 1989. “The plan must provide policies, methods, and procedures to fulfill the duties and responsibilities set out in Section 203.002 concerning the management and preservation of records. The plan may establish additional policies or procedures for the operation of the records management

³⁰ EDRMS is becoming more of a standard business practice. For more information, please see Waldron (2008).

³¹ A copy of Austin Energy’s Records Management Plan is available in Appendix 1.

³² For more information on developing a comprehensive records management plan, please see Guarino (1993) and Morris and Dean (2006).

program that are consistent with the requirements of this subtitle and rules adopted under it,” (Tex. Loc. Gov’t Code Annotated §203 Vernon 2008).³³

Applicability to Local Utilities

The state code also governs the establishment of local ordinances relating to the disposition of all local records. The City of Austin’s code dictates that the plan must

The records management plan must:

- (1) reduce the cost and improve the efficiency of record-keeping;
- (2) enable the records management officer to perform the duties prescribed by Section 2-11-3 (*Records Management Officer*);
- (3) establish eligibility criteria for microfilming or electronic storage of records;
- (4) provide microfilming or electronic storage of records in compliance with state law and the rules of the Texas State Library and Archives Commission;
- (5) provide adequate protection of the essential records of the City;
- (6) preserve City records that are of historical value; and
- (7) regulate the operations and use of the records center serving as the depository of inactive records with continuing value to the City, except records that have been transferred to the Austin History Center for preservation as historical records. (City of Austin Code 2008, § 2-11-5).

Establishment of the utilities SOP should mirror both the state and local legislative standard while taking industrial regulations from ERCOT and ISO into consideration for final formulation.

Establishment of a Records Management Team (RMT)³⁴

A records management team (RMT) consists of staff members dedicated to the development of a records management system. In a public utility, an RMT coordinates all aspects of the system’s operation and develops the agency’s records management plan. The membership should span different positions represented by the hierarchical

³³Local Government Records are defined by the Texas Local Government Code §203. That code will be the reference point for the legislation throughout the project.

³⁴ The design for this records management team is modeled after the City of Austin’s Records Management Program. No external reference to this program is available.

structure including a Records Manager (Administrator), Records Specialist (Resident Expert), and Contacts (Support Staff). Each member of the team performs a function corresponding to their role in the hierarchy. Records management teams are important because they formalize responsibility in managing the system.³⁵ According to Richard J. Cox, a public agency has a “responsibility to [develop] a records management team,” (2005, 3).

Records Managers (Administrators)

At the helm of the records management team is a Records Manager or Administrator. This individual should be either a professional in the field of information sciences or an agency executive familiar with control over budget and resource functions within an agency. Texas public utilities are required to designate a person at the administrator level to serve as the principle custodian of the agency’s records. State law dictates that this individual should have the operational authority to allocate personnel and budgetary resources appropriately in order to ensure that the utility’s records management plan will function with minimal difficulty. Local codes define the differences between a Records Management Officer (RMO) and a Records Administrator by subdividing the positions in separate sections of the law.³⁶ The records administrator functions at the utility or departmental level while a records management officer is generally only present in municipally owned utilities. In this setting, the RMO is a member of the city staff, reporting directly to the city administrator. For purposes of compliance, this is also the individual that reports to TSLAC and ensures that an agency is meeting all of the components of the code. The City of Austin Code defines the duties

³⁵ An in-depth analysis of a team’s role in records management is conducted by Loadman (2001).

³⁶ The Records Management Officer is usually not a direct member of the records management team; but an executive level sponsor.

of a records administrator as in §2-11-7. One of the primary functions of the RA pertains to document storage. The Code dictates that the RA shall “ensure the maintenance of the department’s records and carry out the preservation, microfilming, electronic storage, destruction, and other disposition of the department’s records according to the records management plan, this chapter, and state law,”(City of Austin Code 2008, §2-11-7(2). Internal departmental standards within a utility should be developed in a manner that reflects compliance with all legal standards.

Records Specialist (Resident Experts)

Functioning at the second level of the records management team is a person who specializes in the day-to-day operations of a records management system. Depending upon the needs and size of the agency, this person may or may not be a management level employee. The Specialist (also called an analyst in some governmental agencies) serves as the routine operational manager for the records management program with a local public utility. Regional public utilities may not have an individual dedicated specifically to this position. The specialist is most common in utilities that are under municipal authority. This person should have access to all utility records and serve as the resident expert on program operations. Records experts assist in ensuring accountability among utilities for compliance standards. Elizabeth Shepherd (2006, 12) discusses why this is important when she says that “...records are an essential part of accountability in government, in the maintenance of transparent democracies, in the provision of access by citizens to information and in the effective formulation and execution of policies.” All of these considerations should be paramount to experts in the records management field. The specialist serves as the individual who holds the entire utility accountable for records

management compliance.³⁷ In regional utilities, specialists often report to the Director of Human Resources, Finance, Audit or Legal Services.

Contacts (Support Staff)

Contacts are workgroup level administrative associates within a public utility who serve as the reference points for all office employees on basic organizational records management practices. Still, public agencies must fill these positions with individuals who are most knowledgeable about the types of documents a particular workgroup retains. The section contact should work closely with the records administrator and liaison to determine which documents will be included on a control schedule as a result of the inventory process. In municipally owned utilities, these individuals receive feedback from the records management officer via the records management team's chain of command.

Team Training

It is imperative that employees with records responsibilities stay current on archival and information management policies and procedures. In public utilities, this is extremely important because of the large number of industrial and legislative regulations that govern their operations. These updates include legislative changes, industry standards and opportunities for professional development; and are normally done via communication from the records manager.

Another important aspect of team training is participation in conferences and workshops. Sandra Haycock (1990, 56) discusses the importance of such participation by archival and records management professionals. It is also important to reestablish the link between archival administration and records managements. Both practices must

³⁷ For more information on the experts in a system, please see Compton and Jansen (1990).

have a noticeable presence at trainings and conferences. Her key point is that active participation by archivists is important to the continuity of any records management program. “An archival presence at a records management conference is a very positive step for [the] profession.” Her reasoning centers around the idea that there has been a lack of active participation by an archivist in conferences. Despite the lack of participation in conferences, records management professionals remain highly involved in other professional development activities.³⁸ This is necessary for the survival of a records program. As records management programs develop, the need to train personnel responsible for implementation grows. Administrators are responding by increasing team development.

Retention and Control Schedule Management

Retention and control schedules document how long a record and/or file series should be kept.³⁹ These schedules also determine whether additional action such as legal review and/or transfer to an archive center, is necessary. Control schedules are the industry standard in the field of records management. Support for this statement is found in a study of the relevant literature. Stephen Bailey (1999,33) identifies the retention schedule as a vital component of the records management process. He claims that the “retention schedule has long been accepted as one of the principal foundations of any records management [program]. (33)”

Traditionally one of the main justifications for embarking on developing a retention schedule has been to ensure that the [organization] is protected from any adverse legal proceedings, by ensuring that important evidential records are retained as long as required, and that records that should have been destroyed have been. This managed disposal process also has the additional benefits of saving space and therefore time and money, (Bailey 1999, 33).

³⁸ For more information on professional development in records management, consult Hare et al (1996).

³⁹ Depending upon the type of agency, they may go by either name; but are the same document.

Bailey's article includes chronology as particularly important to the overall records management process. Later in the article, he explains the preliminary process for developing a retention schedule. By doing so, Bailey accomplishes several objectives. He focuses on the aspect of individual records being part of a file series. Additionally, he places particular relevance on the importance of a retention schedule to business operation. He defines the link between schedule use and off-site record storage.

The best retention schedules already incorporate the fact that if such chronological statements of intent are possible for each series, it must also be possible to define other values and characteristics at this level. As well as defining the overall period for which the record must be kept, they also ascertain where and for how long it is kept locally before any transfer to a non-current storage facility. In this manner the schedule can not only help other members of an [organization] know where useful sources of information can be found, it can also aid those employees to manage their own records more effectively by giving them step-by-step guidance on how to manage the life-cycle of the records they create, (Bailey 1999, 35).

By defining all of these elements in a logical sequence, Bailey (1999) reinforces the importance of continuity in several major components of the records management process.

Industry experts also acknowledge the use of retention schedules as being a standard within the field.⁴⁰ Monica Scott (1997) explains that "Retention schedules can...be developed based on [records management] functions, and classification based on the schedules so that there is a seamless system governing the records from creation [to] final disposition," (1997, 114). Hence, the retention schedule is the tool which governs the "life-cycle" of a file and/or series.⁴¹

⁴⁰ The terms retention and control schedules are used interchangeably in the records management field.

⁴¹ For more information on the role of retention schedules in the records management process; including importance, please see Ryan and Lomas (2007).

Schedule Creation

In public agencies, schedule creation is rooted in legislation. Texas protocol for control schedule creation is found in the Texas Local Government Code which states that “the records management officer shall prepare and file with the director and librarian: (1) a records control schedule listing the following records and establishing a retention period for each as provided by Section 203.042: (A) all records created or received by the local government or elective county office,” (Tex. Loc. Gov’t Code Annotated § 203.041 Vernon 2008). This means that public utilities must comply with retention schedule management practices created by the records managers within their agency. Municipal utilities must also comply with local ordinances governing retention and control schedule development. For example, Austin Energy’s retention schedule development is coordinated by the Office of the City Clerk in Austin and governed by § 2-11-9 of the City Code which dictates that “The records management officer, in cooperation with the department director, shall prepare a records control schedule for each department listing all records created or received by the department and the retention period for each type of record,” (City of Austin Code 2008, § 2-11-9).

The Role of Regulatory Agency Schedules

In most public and industrial settings, a regulatory body mandates records control practices. Public agencies in Texas, including public utilities, utilize two master schedules created by the Texas State Library and Archives Commission (TSLAC) for document control. The use of common master schedules ensures that all public utilities,

such as power, water and solid waste services, will retain common documents consistently.⁴² These schedules address virtually all of the documents those agencies use.

The first schedule that local utilities use is “Local Schedule GR: Retention Schedule for Records Common to All Government Records (4th Edition).”⁴³ This schedule contains the documents most common to all local government operations. Regional agencies often use this document as well, given the frequency of documents listed. The second schedule for use by public utilities is “Local Schedule UT: Retention Schedule For Records of Public Utility Services (2nd Edition).”⁴⁴

Approval and Adoption

Once an organization has created a schedule, it must go through an approval process prior to adoption. This process varies between agencies. In Texas, state law dictates that all retention schedules created by an agency, including all public utilities, must be approved by TSLAC. The commission reviews each schedule in its entirety to ensure that the appropriate retention periods and administrative actions comply with state preservation and archival standards. Once a retention schedule is created by an agency and approved by the state, the commission must approve all revisions. Retention schedules are the final authority on whether a document may be destroyed or archived consistent with common practices. Public utilities should consult a section’s retention schedule prior to taking any action on a document or file series.

⁴² A complete listing of all records management schedules can be found at <http://www.tsl.state.tx.us/slrmlgschedules/index.html>.

⁴³ A complete copy of GR-4 can be found at <http://www.tsl.state.tx.us/slrmlgschedules/pdf/GRv01.pdf>.

⁴⁴ A complete copy of UT-2 can be found at <http://www.tsl.state.tx.us/slrmlgschedules/pdf/UTv01.pdf>.

Variations from Indexes and Registries

Retention schedules are often confused with file indexes and registries. These schedules tell records managers the location of files whereas schedules dictate how long documents should be kept. Experts in the records management field indicate this is a common misconception. Sue Garland (1990, 34) points out that system users often mistake retention schedules for registries when they are in fact two completely different tools. A registry is a master filing schedule of all documents kept in a file series or system; acting as an index. A retention schedule, on the other hand, is the tool that determines how long those file series should be kept. “[Does the agency] have a logically developed, function-based, hierarchically [organized] subject classification scheme linked, of course, to a regularly implemented retention schedule? If not, why not — after all, if charity begins at home, so should records management,” (Garland 1990, 134). Garland’s point here is that the retention schedule serves as the backbone of a records management program. No matter how large a system may be or how many components it may have, every file and every series is linked to the overall system by use of the retention schedule. Therefore, the retention schedule not only maintains continuity from one record or series to the next, but guides the entire process from beginning to end.

Inventory Management

An essential component of records management in any organization is the ability to control inventory. Inventory standards are common throughout the field of records management. Developing consistent inventory practices allows all public utilities to create retention schedules in a manner commensurate with state standards. This ensures that there is minimized potential for variance during the reconciliation process as well.

Smith and Offodile expand on the need for managerial controls within the inventory process of an organization as well as the tools used to execute that function.

“Management needs to control quality, cost, schedule, location of warehouse and ...inventory levels...” (Smith and Offodile 2002, 118).

Inventory Scheduling and Preparation

The inventory process including conduction and reconciliation should occur immediately after an initial walk-through of the office and storage facilities. A physical account of all records must take place before any control schedules can be written. Inventory practices and frequency depend upon the agency or organization that the records management program serves. Process must be unified prior to conducting inventories in order to minimize discrepancies and the time required to actually complete the process. Adequate preparation consists of conducting a physical walk-through of all areas containing records and creating an action-plan as to the best way to conduct the inventory. Training of personnel conducting the inventory is critical so that each inventory is conducted in the same manner. A balance of all of these factors ensures that the inventory process will run seamlessly. “The concept of inventory management consists of establishing and maintaining the proper balance of two complementary, yet conflicting goals: maximum level of service and minimum inventory investment,” (Novak 1980, 364). An effective inventory considers time, cost and efficiency to be effective.

Prioritization and Timeliness

An essential component of inventory management is prioritization and timeliness. Inventories must be conducted in a timely manner so that agencies may establish a

baseline of document-holdings (inventory). Inventories allow records managers to catalogue all of an agency's documents. If the inventory is not conducted immediately prior to the implementation of a program, severe miscalculations during registry set up and audit can occur. "Management of inventory includes setting up new items and making inventory adjustments, and the system supports the inventory management tasks of each organization well," (Barreau 2001, 35). Timely set up is necessary in order to ensure that these processes are controlled.

Inventory Reconciliation

Each organization should develop its own set of inventory process controls. Part of that control mechanism should be a system that ensures the inventory results are correct. Protocols vary among utilities but verification should take place annually at a minimum. Reconciliation is the best way to ensure that additions or deletions to the inventory registry are accurately reflected in the updates to the retention schedule. Support for the importance of reconciliation can also be found in scholarly literature. R. Jayalakshmy et al (2005) stated that the primary reason that most inventory processes break down is "reconciliation not being performed on a timely basis," (2005, 258). Hence, just as a retention schedule is important for the overall records management project, the minute inventory processes must be scheduled logically and maintained appropriately in order to preserve the integrity of the inventory process.

Although legislative standards do not govern the inventory process, industry standards outline a set of practices which establish consistency across utilities. Development of the reconciliation process should be verified with records management professionals, especially if an agency has not conducted an inventory in the past. For

municipal utilities, the office governing the records management process for the jurisdiction should have a set of best practices for the way an inventory reconciliation should be conducted. Although these controls may not be written into an ordinance, the records management officer should outline the functions and timelines of the reconciliation process within an agency. Specific departments may choose to have more stringent protocols if industry standards dictate.

Inventory Control

One of the key points to consider during the inventory process is control. A control assessment is usually conducted as part of the annual inventory process. Several professional articles attest to the importance of inventory control. Thomas C. Harrington et al (1990, 17) emphasized the critical nature of an inventory; and the fact that it has an essential order that must be kept so that the process does not degrade. “Inventory control problems often result in record and physical count discrepancies which may ultimately lead to higher than preferred inventory levels. Conversely, accurate inventory records result in lower inventory investment and are the foundation for forecasting, ordering, tracking, vendor evaluation, and dead stock administration [programs],” (Harrington et al 1990, 17). Just as the use of a retention schedule guides the overall project, an inventory system must also have some form of self-verification. Daniel Shouse et al (2006, 131) explored the finite processes of inventory control in an article entitled “Inventory: Catalyst for Collection Development.” One of the key points of this article is the need for an action plan. As Shouse points out, the development of an action plan is actually rooted in policy. “A plan of action was needed to address the issues necessary to improve the collection based on the inventory outcomes and results. The first step in the

plan of action included the revision of the collection development policy,” (Shouse et al 2006, 131). Shouse’s point is in context with the development of a master records archive for a research collection. The same principle can be applied to any records management plan made up of files or file series.

Post-Inventory Processing

Once the inventory and initial reconciliation processes are completed, it then becomes necessary for agencies to begin destroying documents that are no longer called for by the retention schedule or by agency use. Municipal utilities should consult their City records management office prior to conducting any destruction processes unless they have a records liaison in place to moderate the process. Post-inventory transfer to an archives facility is also at the discretion of the records administrator/liaison. All dispositional actions on a record must be in compliance with standards dictated in the retention schedule.

Vital Records Management

Certain records are essential to the operation of a government agency; especially in the case of public utilities. Records which are “mission critical” to maintain agency operations are known as vital records. Once vital records have been identified, certain actions must be taken to protect them in the event of a disaster. Agencies must also account for vital records when writing their records management plans.

Identification of Vital Records

There are several sources for defining vital and essential records for public agencies.⁴⁵ Public utilities should draw upon legislation and guidance from regulatory

⁴⁵ For research purposes, vital and essential records play the same role. Essential records are termed vital records in industry standards.

agencies in identifying their vital records. The Texas Local Government Code § 201.003 defines essential records as “any local government record necessary to the resumption or continuation of government operations in an emergency or disaster, to the re-creation of the legal and financial status of the government, or to the protection and fulfillment of obligations to the people of the state,” (Tex. Loc. Gov’t Code Annotated § 201.003 Vernon 2008). The Association of Records Managers and Administrators (ARMA) is the industry’s professional association. It also has specific terms defining vital records. “A vital record is any recorded information that is identified as essential for the continuation or survival of the organization if a disaster strikes. A very small percentage of an organization’s records are vital – estimates range from 2 to 7 percent,” (ARMA 2008, 2).

Delineation between Vital and Operational Records

Records are most commonly defined as either vital or operational. In most cases, vital records are defined as any records necessary to protect the legal and financial status of an agency; or any record that one might need in the event of an emergency.⁴⁶ Most experts consider vital records programs the backbone of a records management program. Angela Kenny (1989, 54) links the role of a Records Manager as the keeper of essential business or agency operating components. “The Records Manager has two basic types of records for which he is responsible. These are operational and vital records.”

Records Prioritization

Operational records may have components essential to business continuity but vital records are considered the keystone of an agency or utility. Kenny (1989, 57) goes on to say that those vital records usually account for “...less than 20% of a company’s

⁴⁶ Adapted from the “10 Steps to Creating a Records Management Program” training session sponsored by the Office of the City Clerk, City of Austin dated 25 April 2008.

documentation.” Kenny recommends that records managers not become so concerned with the protection of operational records that they neglect their responsibility of protecting vital records. Given the large volume of operational records within an organization, it is easy to overlook vital records during the reconciliation process.

Vital Records Storage

One key consideration in preparing a disaster recovery plan is how records will be accessed in the event of an emergency. Methods for accessing data among Texas public utilities vary because of varying requirements for data storage. The Texas Local Government Code calls for documents with permanent retention values, essential or of historical significance to be microfilmed. “Any local government record may be maintained on microfilm in addition to or instead of paper or other media, subject to the requirements of this chapter and rules adopted under it,” (Tex. Loc. Gov’t Code Annotated § 204.002 Vernon 2008).

Public utilities may be obligated to store essential records utilizing this method if prescribed by local ordinance. In some municipalities, storage methods are expanded to include electronic storage capabilities. The standards created for electronic storage must comply with state law. For example, the Austin City Code directs that “The creation, maintenance, preservation, electronic document imaging, and storage of the electronic records of the City must comply with the records management plan, this chapter, state law, and the administrative rules of the Texas State Library and Archives Commission,” (City of Austin Code 2008, § 2-11-13).

Industry standards diverge on the appropriate storage methods for vital records. Experts within the field tend to advocate electronic database storage due to the

availability of modern technology. However, a remote backup system must have failsafe components at multiple locations.

A remote backup database system tracks the state of a primary system, taking over transaction processing when disaster hits the primary site. The primary and backup sites are physically isolated so that failures at one site are unlikely to propagate to the other. For correctness, the execution schedule at the backup must be equivalent to that at the primary. When the primary and backup sites contain a single processor, it is easy to achieve this property. However, this is harder to do when each site contains multiple processors and sites are connected via multiple communication lines,” (King et al 1991, 368).

Backup systems must be purposefully complex in order to account for all possible contingencies. If offsite retrieval systems are overly simplistic, analysis of existing data reveals that they have a higher chance of failure. It is therefore necessary, that all components of a backup system function independently for business continuity.

Vital Records Preservation

Once vital records are properly stored, they must be preserved for long term use. Public agencies, including utilities, rely on archivists to maintain their records for long-term permanent reference. Methods of preservation will vary among agencies. The largest reason for this variance is the availability of resources. A public utility’s records management team should draw upon the resources of regulatory agencies in their jurisdiction. If a utility is municipal, the City Clerk’s office should be responsible for long-term preservation.

Existing literature in the field of records management supports the need for preservation. Matt O’Mara explores the link between business continuity and vital records by discussing how preservation of essential information is actually a team oriented process. He charges the archivist with

“setting up an experienced project team; implementing suitable communications to engage the stakeholders; identify and prioritize vital records or business continuity/disaster recovery plan; instigate a pilot or proof of concept scheme; and implement suitable training resources, with knowledge bases and ancillary tools setting up an experienced project team; implementing suitable communications to engage the stakeholders; identify and prioritize vital records or business continuity/disaster recovery plan; instigate a pilot or proof of concept scheme; and implement suitable training resources, with knowledge bases and ancillary tools,” (O’Mara 2006, 57).

In every phase of the records management process, a sense of continuity among all project managers and individuals with a vested interest is of the utmost importance.⁴⁷

Other experts in the records management and archival field explain that vital records are also essential to the effectiveness and efficiency of a business.⁴⁸ Jeremy Pope (2006, 25) argues that proper records management plans must “[Stress] the vital importance of accurate and efficient records management for the government of a country and even for the health of democracy itself.” Pope uses his experiences with “government records management practices in a number of developing countries to reveal the problems that are caused when vital records are lost or destroyed or the even worse situation when records are deliberately falsified as part of a system of corruption...,” (Pope 2006, 67). By those statements Pope reinforces the assertion that vital records management and preservation is an integral part of any records management project.

⁴⁷ O’Mara uses the term stakeholders to represent individuals with a vested interest.

⁴⁸ Efficiency v. Effectiveness in Public Administration is expanded upon in the Total Quality Management theory by Wilkinson and Redman. See more information on this topic at <http://www.informaworld.com/smpp/content~content=a713600640~db=all>.

Chapter Summary

Analysis of the state of records management in public utilities has revealed the need to develop a preliminary model to manage the process. In order to accurately manage records, processes must be unified. The elements of this preliminary model represent the most important aspects of the records management process. The model allows for various utilities to develop their own sub-processes pursuant to jurisdictional rules and needs. A complete copy of the preliminary model is available in Table 3.1. The next chapter discusses the methodology used to conduct this study.

**Table 3.1: Preliminary Model Records Management System:
Components Tied to Literature**

Ideal Type Components	Sources
<p>System Design</p> <ul style="list-style-type: none"> ✓ Definition of Records ✓ Compliance with Regulatory Agencies ✓ Jurisdictional Designation ✓ Jurisdictional Compliance 	<p>Tex. Loc. Gov't Code 2008, Zawiyah et al 1998, Ambrose 2008, Bedford and Morelli 2006, Eberhart 1967, Jacquez and Simon 1993, Copas and Hilton 1990, Ellis 1982, Grisales 2008, Waldron 2008</p>
<p>Establishment of a Records Management Plan</p> <ul style="list-style-type: none"> ✓ Plan Composition ✓ Applicability to Local Utilities 	<p>Tex. Loc. Gov't Code 2008, City of Austin Code 2008, Guarino 1993, Morris and Hackbert-Dean 2006</p>
<p>Establishment of a Records Management Team</p> <ul style="list-style-type: none"> ✓ Records Managers (Administrators) ✓ Records Specialists (Resident Experts) ✓ Contacts (Support Staff) ✓ Team Training 	<p>City of Austin Code 2008, Shepherd 2006, Haycock 1990, Loadman 2001, Cox 2005, Compton and Jansen 1990, Hare et al 1996</p>
<p>Retention and Control Schedule Management</p> <ul style="list-style-type: none"> ✓ Schedule Creation ✓ The Role of Regulatory Agency Schedules ✓ Approval and Adoption ✓ Variations from Indexes and Registries 	<p>Bailey 1999, Scott 1997, Tex. Loc. Gov't Code 2008, City of Austin Code 2008, Garland 1990, Ryan and Lomas 2007</p>
<p>Inventory Management</p> <ul style="list-style-type: none"> ✓ Scheduling and Preparation ✓ Prioritization and Timeliness ✓ Reconciliation ✓ Control ✓ Post-Inventory Processing 	<p>Smith and Offodile 2002, Novak 1980, Barreau 2001, Jayalakshmy 2005, Harrington et al 1990, Shouse et al 2006</p>
<p>Vital Records Management</p> <ul style="list-style-type: none"> ✓ Identification of Vital Records ✓ Delineation between Vital and Operational Records ✓ Records Prioritization ✓ Vital Record Storage ✓ Vital Record Preservation 	<p>Tex. Loc. Gov't Code 2008, ARMA 2008, Kenny 1989, City of Austin Code 2008, King et al 1991, O'Mara 2006, Pope 2006,</p>

CHAPTER 4 – METHODOLOGY

Chapter Purpose

The purpose of this chapter is to describe the methods used to improve the preliminary records management system developed in the Chapter 3. The primary method of analysis is focused interviews of experts in the Texas Public Utility records management field.

Focused Interviews

Purpose of Method

Interviews were conducted with public records management professionals. The purpose of the interview process is to evaluate the preliminary model and find ways to improve it. Each question during the interview asks the expert to evaluate the relevance of the components and the elements to the overall system.

Selection of Experts

The candidates for the interviews have been selected from a variety of agencies and specializations. All interviewees have either senior-level records management responsibilities, advanced degrees in information science, or serve as faculty in university Information Science programs in Texas. Those experts were contacted via professional development meetings and university conferences. The candidates selected represent a cross-section of professionals in the field of records management. A balance between academicians and professionals allows a greater opportunity for comprehensive feedback on the model. The final pool consists of one compliance administrator, one information science advanced practitioner, two public utility managers, two public utility attorneys, one open records attorney, one records management administrator, and two public

records analysts. Each individual deals with records management on a daily basis and has a unique perspective to contribute.

Questions to be Presented

The questions asked during the interview correlate directly with the preliminary model. Both closed and open-ended questions were necessary in order to ascertain validity. The closed-ended questions focused on whether or not the interviewee believes the element presented is truly relevant to the topic. The open-ended questions allow for the expert to contribute unique material to the new model's development.

The interviews began by showing the respondents a copy of the preliminary model. Respondents were asked about the model as a whole. Then each component (e.g. System Design, etc) was separated in order to determine whether the elements within the components made sense and were sufficient (See Table 4.1). For example, the component "Establishment of a Records Management Plan" contains the following elements: 1) "Plan composition" and 2) "Applicability to local utilities." Respondents were asked to review the elements and indicate if any should be added or removed.⁴⁹

⁴⁹ A copy of the complete interview form can be found in Appendix 2.

Table 4.1: Operationalization of Focused Interview Query

<u>Preliminary Model Component</u>	<u>Query</u>	<u>Possible Response(s)</u>
Preliminary Model	Are all of the components listed in the preliminary model relevant to a records management program for Texas Public Utilities?	Yes, No
	Please consider the sequence of elements within the preliminary model. As presented, does the model present a logical progression of steps within a preliminary records management program? If not, what should be changed?	Varies
System Design	Please review the elements in the “System Design” component. Should any be eliminated? If so, which one(s)?	Varies from model
	Please review the elements in the “System Design” component. Should any be added? If so, what?	Varies
Establishment of a Records Management Plan	Please review the elements in the “Establishment of a Records Management Plan” component. Should any be eliminated? If so, which one(s)?	Varies from model
	Please review the elements in the “Establishment of a Records Management Plan” component. Should any be added? If so, what?	Varies
Establishment of a Records Management Team	Please review the elements in the “Establishment of a Records Management Team” component. Should any be eliminated? If so, which one(s)?	Varies from model
	Please review the elements in the “Establishment of a Records Management Team” component. Should any be added? If so, what?	Varies
Retention and Control Schedule Management	Please review the elements in the “Retention and Control Schedule Management” component. Should any be eliminated? If so, which one(s)?	Varies from model
Inventory Management	Please review the elements in the “Inventory Management” component. Should any be eliminated? If so, which one(s)?	Varies from model
	Please review the elements in the “Inventory Management” component. Should any be added? If so, what?	Varies
Vital Records Management	Please review the elements in the “Vital Records Management” component. Should any be eliminated? If so, which one(s)?	Varies from model
	Please review the elements in the “Vital Records Management” component. Should any be added? If so, what?	Varies

Reporting of Results

Quantitative results are reported in table format using Frequency Distribution and Rate of Recommended Change. Qualitative results are specifically listed.

Frequency Distribution

Purpose of Method

Frequency distribution is used to report responses to the closed-ended questions posed in the interview.

Reporting of Results

All quantified results are reported in tables according to the question.

Human Subjects Protection

Clearance with Institutional Review Board

Prior to conducting any interviews this research project was cleared in writing by the Institutional Review Board of Texas State University-San Marcos and found to be exempt from review.

Privacy Practices⁵⁰

No confidential or identifying information was collected during the course of this project, so no privacy practices are required to be disclosed to subject participants.

Statement of the Research Purpose⁵¹

A statement of the research purpose was included as part of the interview packet. All relevant information was disclosed to respondents prior to participation in the project.

⁵⁰ A copy of the Privacy Practices handout can be found in Appendix 3.

⁵¹ The research purpose is the same as that indicated in Chapter 1 (Introduction).

Anonymity of Results

Results are reported in statistical form. The only exception is linking of qualitative responses to open-ended questions during the focused interview process.

Benefits to Project Participants

No monetary or compensatory benefits of any kind were provided for participation in this project. Program participants participated in order to gain a better understanding of the nature of records management programs and how their operational competencies can be expanded. A letter of thanks was provided to each individual and each program that participated.

Confidentiality Statement

No confidential data was released during the course of this research. In order to ensure that all participants understood the sensitive nature of the data discussed, the following confidentiality statement was included in every communication via an electronic medium.

This information is intended solely for the person(s) named herein and may contain material categorized as official government business. You are hereby notified that unauthorized reproduction or dissemination of any data contained in this transmission is strictly prohibited pursuant to the laws of the State of Texas. If you are not the named recipient, please delete this message and notify the sender immediately.

Consent from the research advisor as well as the researcher is required before any information from this project in any form may be released. The researcher advisor is:

Patricia M. Shields, PhD
Director of MPA Program / Professor of Political Science
Texas State University – San Marcos
601 University Drive
San Marcos, Texas 78666

Chapter Summary

The methodology chapter gives expanded details on the interview and frequency distribution methods used in conducting the research. The chapter also explains how results are reported and what steps are being taken to ensure protection of human subjects. In the next chapter, the results of the study are discussed. The interviews are deconstructed by question and each response is discussed in-depth. In the next chapter, the results of the study will be disclosed in detail.

CHAPTER 5 – RESULTS

Chapter Purpose

The purpose of the results chapter is to detail the data received from the field work of this applied research project. In this chapter, detailed results of the focused interviews are explained for each question and correlated to each component within the preliminary model.

Preliminary Model Results

Each of the components was specifically discussed in the interview process. Respondents were asked to evaluate the elements of each component and determine if anything should be added or removed. Each respondent was also asked to evaluate the overall model and give feedback in areas such as relevance to Texas public utilities, the sequence of components, and the research process. This section of the “Results” chapter profiles each component in the order listed in Table 3.1 and then discusses respondent’s feedback about the overall model. Each of the respondents was asked hierarchical questions⁵² to evaluate the logic and substance of those elements. Each table shows the frequency distribution. Results are reported in raw format. Changes are subsequently reported.

System Design

During the “System Design” portion of the interview, respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

⁵² “Hierarchical questions” refers to the discussion of more data, based on the initial response to the question.

- ✓ Definition of Records
- ✓ Compliance with Regulatory Agencies
- ✓ Jurisdictional Designation
- ✓ Jurisdictional Compliance

Table 5.1 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.1: System Design
(Frequency Distribution)

Action on Elements	N	Affirmative ⁵³ Responses	Change Recommended?
Add	10	8	Yes
Remove	10	0	No

The following changes were recommended for the “System Design” element from the pool of experts during the focused interview process. The Compliance Administrator, Advance Practitioner, and Public Utility Managers recommended adding the element “Impact on Plan Development”. The overall system largely impacts how the plan will be written and should be discussed. It was also recommended that the target audience be defined as part of the “System Design” component per the Records Management Administrator, Public Utility Attorneys, and Public Records Analysts. The next recommendation was to absorb “System Design” into “Establishment of a Records Management Plan”. This change allows for better flow according to the Records Management Administrator and Public Records Analysts. Finally, the Public Records Analysts who were interviewed stated that more terms than “records” should be defined. It was also recommended that the model include terms such as non-records, important records, vital records, etc.

⁵³ If Affirmative Responses (AR) ≥ 1 then “Change Recommended” (CR) = Yes. If AR=0 then CR=No.

Establishment of a Records Management Plan

During the “Establishment of a Records Management Plan” portion of the interview respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

- ✓ Plan Composition
- ✓ Applicability to Local Utilities

Table 5.2 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.2: Establishment of a Records Management Plan
(Frequency Distribution)

Action on Elements	N	Affirmative Responses	Change Recommended?
Add	10	7	Yes
Remove	10	0	No

The following changes were recommended for the “Establishment of a Records Management Plan” element from the pool of experts during the focused interview process. Respondents recommended the element “How the Plan will Achieve Compliance” be added to the model, and that it explain the plan’s role in complying with governmental and industrial regulations. This suggestion was made by the Compliance Administrator, Advanced Practitioner, and Public Utility Managers. Next, the study should identify the audience of the plan; according to the Records Management Administrator, and Public Records Analysts. Third, the model should identify the purpose/goals of the plan. This suggestion was made by the Records Management Administrator and Public Records Analysts. Fourth, the element “Implementation of Plan” should be added. Respondents felt it was important to consider how the plan will be implemented once approved. This suggestion was offered by the Records Management

Administrator and Public Records Analysts. Respondents also suggested that the element “Plan Composition” seems vague. The Public Records Analysts who were interviewed suggested that “the model keep in mind that [the records management plan] is a very complex area, and lots of details will need to be plotted out to fulfill this component.” Finally, the interviewees recommended the addition of the “Training” element. According to one of the Public Records Analysts, it is important to consider how the audience and those responsible for executing the plan will be briefed.

Establishment of a Records Management Team

During the “Establishment of a Records Management Team” portion of the interview respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

- ✓ Records Managers (Administrators)
- ✓ Records Specialists (Resident Experts)
- ✓ Contacts (Support Staff)
- ✓ Team Training

Table 5.3 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.3: Establishment of a Records Management Team
(Frequency Distribution)

Action on Elements	N	Affirmative Responses	Change Recommended?
Add	10	7	Yes
Remove	10	0	No

The following changes were recommended for the “Establishment of a Records Management Plan” element from the pool of experts during the focused interview process. Next, the respondents felt that the element “Auditors” needed to be added since

these are the individuals responsible for ensuring that the system remains compliant with applicable policy. This suggestion was made repeatedly by the Compliance Administrator, Advanced Practitioner, and Public Utility Managers interviewed during the study. Also, the same experts recommended that the element “Executive Sponsors” be added. The executive sponsor has the ability to allocate resources at the administrative level. Additionally, the Open Records Attorney and Public Utility Attorneys recommended that the element “Global Participants” be added to the component. It is important to consider who the policy/plan will impact (e.g. entire utility). Finally, the Public Utility Attorneys recommended adding the element “External Cooperation.” It is important to consider the input of other agencies that may be impacted by the plan’s implementation.

Retention and Control Schedule Management

During the “Retention and Control Schedule Management” portion of the interview, respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

- ✓ Schedule Creation
- ✓ The Role of Regulatory Agency Schedules
- ✓ Approval and Adoption
- ✓ Variations from Indexes and Registries

Table 5.4 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.4: Retention and Control Schedule Management
(Frequency Distribution)

Action on Elements	N	Affirmative Responses	Change Recommended?
Add	10	9	Yes
Remove	10	0	No

Respondents recommended the following changes to the “Retention and Control Schedule Management” element during the focused interview process. First, the model should, examine the “Role of Regulatory Agency Schedules” before discussing “Schedule Creation” in order to allow for better flow between the elements. This was suggested by the Compliance Administrator, Advanced Practitioner, and Public Utility Managers. Next, the Compliance Administrator, Advanced Practitioner and Public Utility Managers recommended adding the element “Variations from Plan”, to illustrate consistency with the “Variations from Indexes and Registries” element. Also, responding Public Utility Managers and Attorneys suggested further defining the role of regulatory schedules. The component needs to delineate between governmental regulatory schedules and industrial regulatory schedules. Next, the Records Management Administrator and Public Records Analysts recommended adding the element “Implementation”. Once the schedule has been approved and adopted it must be implemented agency wide. Also, the same interviewees recommended adding the element “Disposition”. Retention and Control schedules discuss how records will be disposed of once they have outlived their active use. Next, a recommendation was made to add the element: “Compliance Enforcement”. The procedures for enforcing the schedule must be communicated as part of the component; according to the Open Records Attorney and Public Utility Attorneys who were interviewed during the process. Finally, one of the Public Records Analysts recommended that the element “Conduct Records Inventory”. An evaluation of current holdings must be obtained before a schedule can be created.

Inventory Management

During the “Inventory Management” portion of the interview respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

- ✓ Scheduling and Preparation
- ✓ Prioritization and Timeliness
- ✓ Reconciliation
- ✓ Control
- ✓ Post-Inventory Processing

Table 5.5 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.5: Inventory Management
(Frequency Distribution)

Action on Elements	N	Affirmative Responses	Change Recommended?
Add	10	7	Yes
Remove	10	0	No

The following changes were recommended for the “Inventory Management” element by the interview pool during the focused interview process. First, the experts recommended that the element “Assignment of Responsibility” be added to the model. The Compliance Administrator, Advanced Practitioner, and Public Utility Managers made this suggestion.

The respondents directed that the model should explain which personnel are responsible for inventory functions. Second, the same respondents recommended moving “Delineation between Vital and Operational Records” to “Inventory Management” element rather than ‘Vital Records Management’. According to the respondents, there may be different processes for accounting for the various types of records which must be

considered before any inventory functions are carried out. Third, both Public Utility Managers interviewed during the study suggested adding the element “Coordination of Disposition of Records”. As part of the inventory process, all team members must understand how records will be disposed of if they are found to be obsolete after the inventory is conducted and a control schedule has been implemented. Fourth, the Records Management Administrator and Public Records Analysts recommended adding the element “Delineation of Format”. Their reasoning was that records on various types of media (e.g.: paper, tape, electronic, etc) require different cataloging procedures. Next, the element “Documentation/Reporting” should be added; according to the attorneys interviewed during the study. In their opinion, the method in which inventory results will be reported is vital to the process. The suggestion was made by the Public Records Analysts that the element “Scheduling” needs more definition. There must be a clear delineation between “Retention and Control Schedule Management” and the scheduling of inventories because these are two separate processes and readers might get confused. The analysts also suggested an alternate pairing: “Scheduling and Timeliness” and “Prioritization and Preparation.” They suggested that the progression was more logical.

Vital Records Management

During the “Vital Records Management” portion of the interview, respondents were asked to consider the order and substance of the following items with regard to records management in Texas public utilities.

- ✓ Identification of Vital Records
- ✓ Delineation between Vital and Operational Records
- ✓ Records Prioritization
- ✓ Vital Records Storage
- ✓ Vital Records Preservation

Table 5.6 shows the frequency distribution of all responses received during this portion of the focused interview process. The response rate was 100%.

Table 5.6: Vital Records Management
(Frequency Distribution)

Action on Elements	N	Affirmative Responses	Change Recommended?
Add	10	8	Yes
Remove	10	4	Yes

The following changes were recommended to the “Vital Records Management” element from the pool of experts during the focused interview process. The first recommendation was to move “Delineation between Vital and Operational Records” to the “Inventory Management” element rather than ‘Vital Records Management’ element. According to the Compliance Administrator, Advanced Practitioner, and Public Utility Managers, there may be different processes in accounting for the various types of records which must be considered before any inventory functions are carried out. Second, all of the Attorneys, Analysts and the Records Management Administrators stated that the model needed to further develop “Identification of Vital Records.” This is done in order to enhance the understanding of what a vital record is, and to consider the different types (e.g.: Mission Critical, Business Critical, Business Important, etc.). Also, both Public Utility Attorneys stated that the element “Definition of a Vital Record” should be added. It is important to identify what particular elements qualify a record as vital. Also, the suggestion was made to add the element “Preservation of Historical Records”. It is important to note that historical and vital records are different and may require different procedures for long-term preservation. This recommendation was made by the Records Management Administrator and both Public Records Analysts.

Global Results⁵⁴

The results in this section reflect the responses to the four questions referencing changes to the entire preliminary model. In the following tables, a change would only be recommended if “No” was greater than or equal to 1 in its number of responses.

Component Relevance

The first interview question asked whether or not all of the elements in the model were relevant to public utility records management in Texas. Table 5.7 illustrates the frequency distribution of respondents’ views of this query.

Table 5.7: Component Relevance
(Frequency Distribution)

Possible Response	N	Number of Responses
Yes	10	10
No	10	0

All respondents felt that each component of the model was relevant to a records management system in Texas public utilities. No deletions were recommended.

Logical Progression

The second interview question asked whether or not the order of the components represented a logical sequence in the development of a system. Table 5.8 illustrates the frequency distribution of respondents’ views of this query.

Table 5.8: Logical Progression
(Frequency Distribution)

Possible Response	N	Number of Responses
Yes	10	1
No	10	9

⁵⁴ Note: Recommended change rate is not applicable in this section.

Several changes were recommended during the evaluation of this question. All but one of the respondents explained that the “Retention and Control Schedule Management” should be moved to the end of the model. Retention schedules are created as a result of the inventory, so it would be relevant to discuss the development of this component after defining the inventory processes. Three of the respondents felt that the “Vital Records Management” component should be discussed before the “Inventory Management” component. They felt that explaining the process of identifying vital records provides a better understanding about how inventories should be conducted.

Addition of New Components

While there was no specific question that addressed whether or not new components should be added to the model, question fifteen (15) asked for additional comments regarding the model itself. During the portion of that research, all respondents indicated that the following new components should be added:

System Audit & Control

All respondents felt that there should be a separate component within the preliminary model dealing with control. The consensus was that developing the process was not complete without explaining how the system would be evaluated. Within the model, the elements should account for how the audit will be conducted, the audit frequency, standards, consequences for failure, and remedies for deficiencies identified as a result of the audit. The following elements should be identified as part of this component: “Audit Process”, “Audit Frequency”, “Definition of Standards”, “Consequences for Failure”, and “Remedies for Deficiencies”.

Disposition of Records

One respondent felt that there needed to be a separate section discussing how records would be disposed of. Most respondents felt that this was part of the inventory management component.

Disaster Planning and Recovery

Three of the respondents suggested that “Disaster Planning and Recovery” be added to the model as a separate component. The Records Management Administrator and Public Records Analyst stressed that this is different from simply identifying vital records. There must be a plan for how the business will use those vital records and respond in case of an emergency. In some agencies this is also known as “Business Continuity Planning”. In this component the following elements need to be considered: “Access to Vital Records”, “Alternate Operating Sites” and “Communication to Records Management Team (RMT)”, and “Communication to Entire Utility”.

Chapter Summary

Respondents were pleased with the model. While there were some minor changes to some elements in different components, the major concern was the addition of some critical information. The most important change, according to the number of responses received, was the addition of an audit and control process. It was also noted that “Disaster Planning and Recovery” was critical to a records management system. The final chapter in this study summarizes the information discussed in the results chapter and introduces the revised model for a Texas Public Utility Records Management System.

CHAPTER 6 – CONCLUSION

Chapter Purpose

The purpose of the “Conclusion” chapter is to summarize all of the data presented in the results chapter and present the revised preliminary model created during the course of the research. In addition, this chapter discusses the limitations of the research conducted and suggests possibilities for future professional inquiry.

Revised Records Management System Model

This section summarizes the additions, deletions and changes to the order of the preliminary model. Table 6.1 displays the revised model.

Addition of New Components

The data examined in the results chapter was fused with the existing components and elements of the original model to create a revised model that includes two new components: “Disaster Planning & Recovery” and “System Audit & Control”. (See Table 6.1) Each of these contains new elements as defined in their descriptions in the “Results” chapter.

Deletion of Existing Components

The research did not call for any components to be removed.

Changes in Progression of Elements

The “Retention and Control Schedule Management” component was moved to the next to last position in the Model; as this represents the most logical progression of steps in a Texas Public Utility records management program. Inventory and Vital Records procedures produce the elements of a retention schedule.

Revisions to Elements

After the results were entered, they were evaluated in summary format. If at least half of the respondents felt an element should be added to the model, it was incorporated.

System Design

Half of the respondents felt that a target audience should be defined as part of the revised model. The key consideration was who would be impacted by the development of the system.

Establishment of a Records Management Plan

Half of the respondents felt that “Implementation of Plan” should be defined as part of the “Establishment of a Records Management Plan” component. The procedures for implementing the plan are inherently different than its components.

Establishment of a Records Management Team

Half of the respondents felt that “Auditors” should be added as an element of the Records Management Team (RMT). Though it is not defined in the ordinance many respondents believe it is relevant to ensuring compliant records management policies within a public utility. Additionally, half the respondents felt that the element “Executive Sponsor” should be added to the RMT component. This is a project-management position. The Executive Sponsor has the ability to appropriately allocate resources and may function as the Records Manager (Administrator), depending upon utility structure.

Retention and Control Schedule Management

Though there were a number of suggestions to revise this component, no specific recommendation met the standard to be included in the revised model.

Inventory Management

Though there were a number of suggestions to revise this component; no specific recommendation met the standard to be included in the revised model.

Vital Records Management

More than half of the respondents surveyed felt that the “Identification of Vital Records” element should be expanded to further define what is meant by a vital record. Based upon the recommendation of the experts, new elements were created. “Definition of a Vital Record” explains what a vital record is. “Mission Critical Records” outlines the standards for records which are considered the most essential for utility operation. “Business Critical Records” identifies the criteria for determining which records are vital to business operation – yet not considered the most essential records. “Business Important Records” are those which the utility needs in order to sustain daily operation, but that can be held until earliest availability. Since these elements were added, “Identification of Vital Records” and “Records Prioritization” were removed in order to avoid repetition. Table 6.1 introduces the entirely revised Public Utility Records Management System Model with Corresponding Elements.

Table 6.1: Revised Public Utility Records Management System Model with Corresponding Elements

Component	Corresponding Elements
System Design	<ul style="list-style-type: none"> ✓ <i>Target Audience</i> ✓ Definition of a Record ✓ Compliance with Regulatory Agencies ✓ Jurisdictional Designation ✓ Jurisdictional Compliance
Establishment of a Records Management Plan	<ul style="list-style-type: none"> ✓ Plan Composition ✓ <i>Plan Implementation Process</i> ✓ Applicability to Local Utilities
Establishment of a Records Management Team	<ul style="list-style-type: none"> ✓ <i>Executive Sponsors</i> ✓ Records Managers (Administrators) ✓ Records Specialists (Resident Experts) ✓ Contacts (Support Staff) ✓ <i>Auditors (Compliance Specialists)</i> ✓ Team Training
Inventory Management	<ul style="list-style-type: none"> ✓ Scheduling and Preparation ✓ Prioritization and Timeliness ✓ Reconciliation ✓ Approval and Adoption ✓ Variations from Indexes and Registries
Vital Records Management	<ul style="list-style-type: none"> ✓ <i>Definition of a Vital Record</i> ✓ Delineation between Vital and Operational Records ✓ <i>Mission Critical Records</i> ✓ <i>Business Critical Records</i> ✓ <i>Business Important Records</i> ✓ Vital Records Storage ✓ Vital Records Preservation
Retention and Control Schedule Management	<ul style="list-style-type: none"> ✓ Schedule Creation ✓ The Role of Regulatory Agency Schedules ✓ Approval and Adoption ✓ Variations from Indexes and Registries
<i>Disaster Planning and Recovery</i>	<ul style="list-style-type: none"> ✓ <i>Access to vital records</i> ✓ <i>Alternate Operating Sites</i> ✓ <i>Communication to Records Management Team (RMT)</i> ✓ <i>Communication to entire utility</i>
<i>System Audit and Control</i>	<ul style="list-style-type: none"> ✓ <i>Audit Process</i> ✓ <i>Audit Frequency</i> ✓ <i>Definition of Standards</i> ✓ <i>Consequences for Failure</i> ✓ <i>Remedies for Deficiencies</i>

Limitations of Research

While a study of this type can have applicability in virtually any jurisdiction, it is important to remember the purpose and scope of this project. The focus was limited specifically to public utilities in Texas. The data examined in the literature, items from the ideal model and applicability of the elements reflect that focus. Additionally, the word “ideal” is an important consideration in this study. The project represents a goal for utilities to work toward. Adjustments in legislation and composition of the system will be necessary depending upon a variety of factors in different jurisdictions.

Suggestions for Further Study

The very nature of an ideal model study suggests that there is the possibility of expansion and revision.⁵⁵ Dr. Patricia Shields said that “an ideal model study begins with a question and ends with a question.” In the case of this project, an outcomes analysis would be helpful to test the validity of the new model on a records management system. The model is also general enough that it could be revised to suit a different jurisdiction; or possibly even implementation in the private sector.

Chapter Summary

This chapter summarized the recommendations discussed in the results chapter, including the addition and reordering of new components and elements to the ideal model. Additionally, the chapter presented the revised model and discussed the limitations of the study as well as suggestions for future research.

⁵⁵ For more examples of Practical Ideal Type projects and Ideal Model study, please see the following Applied Research Projects: “Greening Affordable Housing: An Assessment of Housing under the Community Development Block Grant and HOME Investment Partnership Programs.” (Sparks 2007), “A Model Assessment Tool for the Incident Command System: A Case Study of the San Antonio Fire Department.” (O’Neill 2008), “Residential Land Use Policy and Conservation Development in the Blanco River Basin.” (Ellis 2006), “A Model Assessment Tool for Classroom Technology Infrastructure in Higher Education” (Vaden 2007).

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City of Austin / Austin Energy



Records Management Plan

Version: 1-D

Approved: PENDING

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Purpose/Objective

To establish a uniform process for managing information and records in all forms within the department.

Definitions/Acronyms

Business Unit	An individual workgroup within the Department.
Custodian	The business unit responsible for creating and/or maintaining the official copy of a record.
COA	City of Austin
Control Schedule	See Records Control Schedule
Convenience Copy	An additional copy of a record provided for auxiliary purposes, including but not limited to, reference, media distribution or public information request.
Inventory	The physical process of accounting for all categorical records holdings within each business unit and the utility.
Inventory and Audit Schedule	A document published by the Records Liaison Officer (RLO) detailing when each business unit's records inventory and semi-annual audits will take place.
Inventory Worksheet	COA Records Inventory Worksheet (Revised: 4/9/2007)
IRF	Inventory Reporting Form
LDRPS	Living Disaster Recovery Planning System
Official Copy	The primary working copy of a record maintained by the custodian.
OCC	Office of the City Clerk
RA	Records Administrator
RC	Records Contact
RLO	Records Liaison Officer
RMC	Records Management Committee
RMO	Records Management Officer
RMS	Records Management Services
RMT	Records Management Team

Record	Any tool created and/or used for the purpose of conducting city business.
Records Control Schedule	An official document created by the Office of the City Clerk created as result of the records inventory conducted at the business unit level. The Records Control Schedule dictates the retention period of a document and lists whether any ancillary action is required on a document prior to disposition.
TSL	Texas State Library and Archives Commission
Vital Record	A record considered essential for operation of the utility. Categories of vital record include: Mission Critical, Business Critical, and Business Important.

Scope

All Austin Energy business units.

Responsibilities

Records Administrator

The Records Administrator (RA) is the executive sponsor for the records management program at Austin Energy. The RA will ensure that appropriate resources are allocated to the program and fulfill all provisions outlined in City Code § 2-11-7. He or she may also delegate responsibilities outlined in said ordinance to the RLO when in the best interest of the Utility.

Records Liaison Officer

The Records Liaison Officer (RLO) is responsible for the daily implementation of the records management program at Austin Energy. Serving as the primary liaison between the utility and RMS, the RLO will distribute information to members of the RMT. In addition, the RLO will serve as the primary consultant for the department on all matters relating to records and information management; including but not limited to policies, cost-benefit analyses, and strategic planning. Finally, the RLO will fulfill all provisions outlined in City Code § 2-11-8 and may take on additional roles and responsibilities deemed necessary by the Records Administrator.

Records Contacts

Each business unit will select one individual tasked with daily records management responsibilities to serve as the Records Contact. The RC will serve as a member of the Utility's Records Management Team. It is the responsibility of the RC to ensure that all members of their respective business unit are kept informed regarding the policies and procedures relevant to records management within the Utility. The RC will also maintain regular communication with the RLO and advise him or her on any issues or concerns that the business unit may have with regard to the records management process.

Records Management Services

Records Management Services is a division within the OCC. RMS will provide oversight of the records management program at Austin Energy as it pertains to compliance with COA policies and procedures and training.

Business Unit Leadership

Business unit leaders are responsible for ensuring that each records contact, and any other employee tasked with daily records management responsibilities, has adequate time to complete related tasks. Managers will also ensure that resources are appropriately allocated, including but not limited to, time, personnel and fiscal resources; in order to accomplish the mission set forth in this policy.

Austin Energy Employees

All AE employees are responsible for ensuring that their record keeping practices are in compliance with the standards set forth in this policy as well as those issued by the City of Austin (COA) or the Texas State Library and Archives Commission (TSL).

Policies/Procedures

1. Records Management Team

- a. The Records Management Team will consist of the Records Administrator (RA), the Records Liaison Officer (RLO), and Records Contacts (RC) as outlined in the “Responsibilities” section of this manual.
- b. The RA will be appointed by the General Manager of Austin Energy.
- c. The RLO will be appointed by the RA.
- d. Each RC will be appointed by the RLO in consultation with business unit leadership.
- e. Letters of appointment are attached as appendices to this document outlining specific individuals currently serving in these capacities.
- f. For appointment of the RC’s, the RLO will solicit recommendations from the appropriate business unit director or manager.
- g. RMS will also advise the Department with regard to the composition of the team.
- h. The RA will serve as the chair of the RMT; however he or she may delegate this responsibility to the RLO.
- i. The RLO is required to inform the RA and RMS of any changes to the team in writing within three (3) working days of the change’s actual occurrence.
- j. The RA will ensure records management related duties of the RLO and RC’s are incorporated into the SSPRs.

2. Records Inventory

a. Overview

- i. The purpose of the records inventory is to identify all record holdings of the utility.
- ii. The inventory is categorical in nature; thus only records series will be identified. (For example, “Time Sheets” is considered a category and will be recorded as such on the inventory reporting forms.

b. Scheduling and Preparation

- i. The Records Liaison Officer (RLO) will devise a schedule for the Utility’s records inventory based upon the structure of the organization chart.
- ii. The RLO is also responsible for ensuring that this schedule is communicated to all members of the Records Management Team (RMT) and business unit leaders.
- iii. Each Records Coordinator (RC) will forward the schedule to all members of their respective business unit.
- iv. Each business unit will have one calendar month to complete the inventory process as defined in the inventory schedule. In some cases, additional time may be required. If the business unit anticipates that they will be unable to meet the deadline, they should contact the RLO as soon as possible.
- v. Prior to the start of the inventory, the RLO will conduct a planning session with the RC and the business unit leadership to discuss processes for how the inventory will be conducted.
 - (1) At the planning session, the RLO, the RC and the business unit leadership will discuss resources such as personnel, time and forms.
- vi. Responsibilities of RLO
 - (1) Provide all necessary forms and tools for completing the inventory to the business unit RC.
 - (2) Provide technical assistance to the business unit during all phases of the inventory.
 - (3) Report findings of the inventory to the business unit, division, Department, RA and RMS.
- vii. Responsibilities of business unit RC
 - (1) Coordinate the scheduling of the inventory process within the respective business unit.
 - (2) Keep business unit employees and the RLO informed as to the progress during the inventory itself.
 - (3) Provide basic assistance to employees within the business unit as requested.

- (4) Collect all completed inventory forms from all employees within the business unit at the conclusion of the inventory process and submit to the RLO.

viii. Responsibilities of business unit leadership

- (1) Ensure that all employees within the business unit have adequate time and resources to complete the inventory process as required.
- (2) Manage the flow of the inventory process to prevent lags in execution.

ix. Forms Required

- (1) COA Records Inventory Worksheet (Revised: 4/9/2007)
- (2) COA Records Inventory Worksheet Instructions
- (3) COA Records Inventory Reporting Form
- (4) Austin Energy Records Inventory Supplemental Instructions

x. Important Information

- (1) During this inventory, only record series will be inventoried. A record series is a group of related records that are filed together. For example, the employee will record “Personnel Files” instead of “Personnel File for Jane Smith”.
- (2) Once a series has been cataloged, no further repetitions of the same file series are required.
 - (a) EXCEPTION: The date range will need to be extended as necessary; for example “Personnel Files” 19XX – 20XX.
- (3) During the inventory, each employee must look in all areas including storage areas, basements, empty cubicles, etc. where files may be kept, even if they suspect no files are present.

c. Process Execution

- i. At the beginning of the scheduled month of the business unit’s inventory, the RC will distribute the inventory forms to all employees responsible for maintaining any City records.
- ii. Each employee will thoroughly read the following forms prior to cataloguing any records:
 - (1) COA Records Inventory Worksheet Instructions
 - (2) Austin Energy Records Inventory Supplemental Instructions
- iii. Each employee will then complete a “COA Records Inventory Worksheet” for the area or business unit for which they are responsible.

d. Reporting

- i. Once all worksheets have been thoroughly completed, each employee will submit their forms to the business unit RC.
 - (1) The RC will then enter all information from the forms into the “COA Records Inventory Reporting Form”
 - (a) Before submitting to the RLO, each RC should distribute the completed IRF to all employees submitting worksheets and check for accuracy.
- ii. After accuracy has been verified, the RC will then submit the completed IRF and worksheets to the RLO.
- iii. The RLO will compile all submitted forms and submit to RMS for creation of the business unit’s Records Control Schedule
- iv. The RLO will keep the Records Administrator and Records Management Services apprised of inventory progress on a regular basis.

e. Inventory Reconciliation

- i. Each RC will review the submitted inventory quarterly to verify that any additions or deletions are reported to the RLO and RMS. This is necessary in case the Records Control Schedule needs to be revised.

3. Records Control Schedules

a. Creation

- i. The Records Control Schedule will be created by RMS in response to the department's submission of a records inventory.

b. Approval

- i. Once a draft schedule has been created, RMS will submit it to the department for initial review.
- ii. The RLO will conduct a preliminary review of the schedule and balance it against inventory records submitted by the respective business unit.
- iii. The schedule will then be submitted to the business unit's RC and business unit manager for in-depth review.
 - (1) The business unit will determine if listed retention periods are long enough to suit the unit's business needs.
- iv. If the schedule is approved with no changes, the business unit RC will notify the RLO as soon as possible.
 - (1) The RLO will then notify the RA and RMS that the department is approving the draft control schedule as is.
- v. If changes to the schedule are required, the business unit will suggest alternative retention periods and submit a detailed business justification, in writing, to the RLO.
 - (1) The RLO will then forward the request to the RA for approval of the amendment.
 - (2) Once the department has approved the changes submitted by the department, the RLO will then forward the amended schedule along with the written justification to RMS for further analysis.
 - (3) Once the schedule has been reviewed and approved by the department and RMS, the schedule will be submitted to the Records Management Committee (RMC) for review.
- vi. RMC and TSL Approval
 - (1) The RMC will then review the schedule item by item to ensure compliance with all relevant legislation and policy.
 - (2) RMS will notify the department of any changes requested by the RMC.
- vii. Upon approval by the RMC, RMS will submit the schedule to the Texas State Library and Archives Commission (TSL) for final authorization.
- viii. TSL will review the schedule and notify RMS of approval or changes required.

- ix. Once the final schedule has been approved, it becomes an official document.
- x. The retention periods specified in the control schedule are mandated by federal, state and local statutes. Failure to adhere to those mandates may result in administrative and legal penalties. More information concerning those penalties is available by contacting Legal Services.
- xi. RMS will forward the finally approved schedule including any changes made by the state to the department for immediate implementation.

c. Implementation

- i. The send a copy of the approved control schedule to the business unit.
- ii. At this point, the business unit may begin the disposition, including destruction or archival, provided the retention period for the record in question has expired.

d. Amendment Process

- i. Should the business needs of the department change, a unit's control schedule may be revised to add record series, delete record series or modify an existing retention period..
- ii. The business unit's RC will notify the RLO of needed changes to the control schedule and submitted revisions, along with appropriate justification for changes.
- iii. The RLO will forward the amendment request to the RA for approval.
- iv. Once the RA has approved the revision, the department will forward the request to RMS for further review.
- v. Once the RMC has approved the changes, revision will be sent to TSL for final review.
- vi. RMS will then notify the department of TSL's decision regarding the changes.
- vii. If approved, the amended control schedule will either supplement the existing or replace all previous versions of the schedule.

4. Internal Records Management Procedures

a. Application

- i. This process applies to all business units storing records on Austin Energy's records management contract only.
- ii. All other business units should follow policies and procedures mandated by RMS and the City of Austin.

b. Storage of Inactive Records

- i. All storage of inactive records will take place at an off-site storage facility.

c. Transmittal

- i. A business unit's Records Contact (RC) will be responsible for the transmittal of all respective records to storage.
- ii. The business unit will complete a Records Transmittal Form and any documentation required by the vendor; and will submit them to Records Liaison Officer (RLO) for processing.
 - (1) If the RC has on-line database access, they may enter the request themselves.
- iii. The RC will complete a vendor-provided transmittal log and retain a copy of all documentation.
- iv. Transmittals will only be processed on Tuesdays or Thursdays unless prior approval has been given by the RLO.

d. Retrieval

- i. A business unit's RC will be responsible for retrieval of their records from storage.
- ii. The RLO will submit a request for retrieval using the box number recorded on the transmittal log to the RLO for processing.
 - (1) If the RC has on-line database access, he or she may enter the request themselves.
- iii. Once the request has been processed, the RLO will forward notification to the business unit.
- iv. The RC will retain a copy retrieval of all documentation according to control schedule mandate.
- v. Retrievals will only be processed on Tuesdays or Thursdays unless prior approval has been given by the RLO. (See Section 4-e "Non Routine Retrieval" for more information.)

e. Non-routine Retrieval

- i. Any requests for non-routine (rush) retrieval must be approved by the RLO in writing prior to the action occurring.
 - (1) If the RLO is unavailable, the business unit should process the request and notify the RLO within two (2) business days for review.
- ii. The business unit must present a justifiable business need for non-routine retrieval.

f. Disposition

- i. The RC should be monitoring the business unit's records control schedule for items eligible for disposition during the quarterly reconciliation process.
- ii. The RLO will also monitor all schedules within the department.
- iii. Once an item is classified as eligible for disposition, the RLO will consult the retention schedule to determine whether additional action is required prior to destruction.
- iv. If no additional action is required the RC will then submit a request for disposition of a box to the RLO for approval.
- v. Once the disposition has been approved by the department, the RLO will notify the off-site vendor of authorization to securely dispose of the records.
- vi. After notification of secure disposition has been received, the RLO will then notify the business unit.

g. Archival

- i. If records eligible for disposition have been identified on the records control schedule as archival or are found to have historical significance, the RLO will notify the Austin History Center (AHC).
- ii. The History Center will then review the records and notify the department of procedures for permanently preserving the documents.
- iii. For records that have been previously identified on the records control schedule as archival, the RC should complete a disposition log to transfer the records to the AHC.
- iv. The completed disposition log should be transferred to the RLO for review and approval.
- v. For records that were not previously identified on the schedule as archival but reviewed by AHC and found not to contain historical information, the records will be securely disposed of.

5. Development of Records Management Policies and Procedures

a. Initial Planning and Creation

- i. In development of these policies and procedures, the Records Liaison Officer (RLO) will first develop a model for how the plan should be constructed.
- ii. The RLO will then submit this model to departmental leadership and Records Management Services (RMS) for review and evaluation.
- iii. Once an outline for final plan development has been created, the RLO will write the policy manual according to Department and COA standards.
- iv. The manual will correspond with existing standards developed by RMS for corporate records management throughout all city departments.

b. Review

- i. Once a draft of the manual has been created, the RLO will forward the draft to the RA (Executive Sponsor) for review.
- ii. The RLO will then request a status meeting with the RA to go over any issues identified during the review process.
- iii. Once the appropriate changes have been made, a revised copy will be submitted to the RA for final review.
 - (1) A copy of the will be sent to RMS for review and consultation.
- iv. Once the RA (Executive Sponsor) has approved the final plan, it will be submitted to the Department's Executive Team for review and approval.

6. Implementation of Records Management Policies and Procedures

a. Initial Implementation

- i. Once the policy receives final approval from the executive team, the RLO will distribute it to all members of the RMT and AE Management Team for immediate implementation.

b. Amendment

- i. The Records Management Policies and Procedures will be reviewed on an annual basis to ensure that current standards reflect the business needs of the department.
- ii. Should the plan require amendment, changes will be made by the RLO and referred to the RA for final review.
- iii. The RA will submit the revisions to the Departmental Executive Team for approval and adoption.

7. Vital Records and Disaster Planning

a. Identification of Vital Records

- i. All members of the RMT will complete the required training courses taught by RMS entitled: “Vital Records” and “Disaster Planning for Records”
- ii. Each business unit will carefully review inventory submissions to determine which records are considered vital or essential for business operation.
- iii. The business unit will classify those records as follows:
 - (1) Mission Critical: Records without which the business unit could not perform its mission in support of the Department, the City of Austin or AE customers.
 - (2) Business Critical: Records which are essential for business operation; but which the business unit does not require daily access to those records.
 - (3) Business Important: Records which the business unit needs to sustain long-term effective operation; however are a lower priority in terms of preservation or access.
- iv. The business unit must be able to justify why those records are considered vital.
- v. Once the appropriate records have been identified, the business unit will notate the appropriate records during initial review of its respective retention schedule.
- vi. The business unit will then submit its vital records list and justification to the RLO who will report the information to RMS for inclusion in the control schedule using the appropriate forms provided by RMS.
- vii. Each business unit will also list their designated vital records in LDRPS.

b. Disaster Recovery Plan Development

- i. The Disaster Recovery Plan (DRP) will be developed as a separate document from this plan.
- ii. The template provided and approved by RMS will be used to develop Austin Energy’s DRP as it relates to records management only.
- iii. During development of the DRP, the RLO will identify a list of required resources; budgetary, personnel and time related, needed to carry out the essential records management functions of the department.
- iv. A list of required resources will be forwarded to the RA for inclusion in the budget request as identified by the needs assessment.

c. Review and Approval

- i. Once the plan is developed, it will follow the review and approval process outlined in section 5-b of this document.

d. Implementation and Amendment

- i. Once the DRP is finally approved, it will follow the implementation and amendment processes outlined in section 6 of this document.

e. Final Distribution

- i. A final copy of the approved DRP will be forwarded to the following offices:
 - (1) Departmental RMT
 - (2) City of Austin RMS
 - (3) AE Emergency Management Coordinator
 - (4) AE Policy Library

8. Records Management Training

a. Required Training

- i. RMT members will be required to complete training sessions at both the departmental and COA levels as outlined in this document.
- ii. Business unit leadership will ensure that their respective RMT members have sufficient time and resources to attend these courses.

b. Departmental Training

- i. The RLO is responsible for creating and conducting annual training sessions on records management policies and procedures applicable to the Utility.
- ii. Once the training has been created, the RLO will notify members of the RMT of the date, time and location of the required training.
- iii. The RMT will, in turn, notify all business unit employees with daily records management responsibilities of the training.
- iv. Each business unit leader is responsible for ensuring that those designated employees have sufficient time to attend this training.
- v. After the training, the RLO will make training material available to all those who attended, as well as those who were unable to attend. In addition, the RLO will provide an attendance report to the leaders of each business unit and certify that the business unit has accomplished this standard as part of the records management audit process.

c. RMS Training

- i. Each member of the RMT is required to complete the following courses according to COA policy.
 - (1) Your Records Management Responsibilities
 - (2) Basic Records Management and Conducting Inventories
 - (3) Reviewing Your Draft Records Control Schedule
 - (4) Applying Corporate Criteria to Your Records
 - (5) How to Develop Records Management Operating Procedures
 - (6) Files Management
 - (7) Implementing Your Records Control Schedule
 - (8) Vital Records Identification and Preservation
 - (9) Disaster Planning
- ii. Other courses may be offered on-demand by RMS. RMT members are encouraged to take advantage of these courses when deemed appropriate.

- iii. Although there is no mandated timeline for completion of these courses, members of the Records Management Team are strongly encouraged to do so as soon as possible.
- iv. RMS will notify the department of each student's attendance in the classes.

d. Post-Training Follow-up

- i. Members of the RMT will distribute the list of available courses to any employee within their business unit with records management responsibilities.
 - (1) These employees are encouraged to take classes relevant to their job duties.
- ii. Supervisors are strongly encouraged to incorporate trainings attended into each employee's SSPR and Action Plan.
- iii. Each business unit's RC is responsible for ensuring that the RLO is notified of new employees who need required training.
- iv. The RLO will coordinate with RMS to ensure that all classes are offered as necessary.

9. Maintaining the Records Management Program

a. Policy Evaluation

- i. The following policies will be reviewed annually by the RMT to determine if any changes are required:
 - (1) Records Management Plan
 - (2) Disaster Recovery Plan
- ii. If changes are recommended, they will follow the amendments processes outlined in their respective sections of this document.
- iii. RMS will be promptly notified of any changes.

b. Annual program maintenance requirements

- i. Per direction from RMS, the following items will be reviewed annually by the RMT and RMS to determine if any changes are required:
 - (1) Existing Records Control Schedules
 - (2) Vital Records Designations
 - (3) Archived and Historical Record Designations
- ii. RMS will be promptly notified of any changes.
- iii. The RA will complete the appropriate 10-Step Checklist for the year and submit the completed checklist to RMS by August 31 of each year.

c. Global Notification of changes

- i. All members of the RMT will notify their respective business unit of records management policies, documents or RMT staffing which may impact their operation.

d. Changes to the Records Management Team (RMT)

- i. Changes to the Records Administrator (RA)
 - (1) The RA'S appointment shall remain in full effect until separation from the department or administrative change authorized by the General Manager of Austin Energy.
 - (2) RMS will be immediately notified of this change.
 - (3) The RLO will then notify members of the RMT
 - (4) Records Management organizational charts and staffing tables will be updated with five (5) business days.
- ii. Changes to the Records Liaison Officer (RLO)
 - (1) The RLO'S appointment shall remain in full effect until separation from the department or administrative change authorized by the Records Administrator of Austin Energy.
 - (2) RMS will be immediately notified of this change.

- (3) The RA will then notify members of the RMT
- (4) Records Management organizational charts and staffing tables will be updated with five (5) business days.

iii. Changes to Records Coordinators (RC)

- (1) The appointment of each RC shall remain in full effect until separation from the department or administrative change authorized by the Records Liaison Officer of Austin Energy.
- (2) RMS will be immediately notified of this change.
- (3) The RLO will then notify members of the RMT
- (4) Records Management organizational charts and staffing tables will be updated with five (5) business days.

10. Records Management Audit Procedures

a. Internal Audits

i. Purpose of Audit

- (1) The purpose of the Records Management Audit is to ensure that a uniform process information management process is adhered to by all business units of the Department.

ii. Frequency of Audit

- (1) All Records Management Audits will take place semi-annually; in May and October.

iii. Auditors

- (1) The audit will be conducted by either the RA or the RLO.

iv. Audit Composition

- (1) The Records Management Control Audit will be conducted with the Confidentiality Audit.

- (2) The RMCA will consist of the following items:

- (a) The Required Documentation section will evaluate the business unit's compliance with the following:

- (i) A valid retention schedule has been established for this business unit and is available for review.
- (ii) A regularly updated log of all records sent for off-site storage is kept by the RC.

- (iii) Completion of all required records management training programs is documented.

1. Internal Training

2. RMS Training

- (iv) RC documents updated directives from the RA/RLO and communicates the updates to all staff members with records management responsibilities.

- (v) All transmittals are logged and appropriate documentation is available for review.

- (vi) Business unit has a copy of Austin Energy's current Records Management Plan available for staff review.

- (vii) Business unit has a signed log-book for non-routine individuals accessing areas with confidential records.

- (viii) All employees have read and signed Austin Energy's policy regarding Confidential Information.

- (ix) Confidentiality breaches are documented by supervisors and a copy has been forwarded to the RLO, HR and Legal Services.
- (b) The Document Security section will evaluate the business unit's compliance with the following:
 - (i) All records containing confidential information are secured.
 - (ii) Access to secured records is controlled via ID Badge, Security Code, etc.
 - (iii) All employees and contractors have read and acknowledged Austin Energy's Confidentiality Policy prior to accessing confidential records.
 - (iv) Only approved shredding procedures are being used.
 - (v) Documents sent to be destroyed by vendor kept in provided bins with locks only.
 - (vi) Visitors do not have unmonitored access to areas where confidential records may be stored.
 - (vii) All persons in access areas are displaying proper ID badges. Visitors are logged at security.
 - (viii) No computer workstation displaying information that could be considered confidential information is left unattended.
 - (ix) Care is used to protect information phone conversations regarding confidential information.
- (3) The procedures for the confidentiality audit will be discussed in the respective policy.
- v. The following personnel should be present during the audit, unless extenuating circumstances exist warrant their absence:
 - (1) Business Unit Manger or senior level manager
 - (2) Business Unit RC
- vi. Interaction with employees
 - (1) Interaction with employees during the audit is necessary in order to gage the understanding of records management policies and procedures within the business unit.
 - (2) Questions and material discussed during the audit will be limited to documented protocols only.
 - (3) Employees will be informed by business unit leadership and RC of material on audit in advance.
- vii. Evaluation of Records Management Practices

- (1) Random evaluations will be conducted to evaluate the physical security and record keeping practices of employees within the business unit as part of compliance verification.
- (2) This audit may include checking desks, drawers, file cabinets, bookshelves etc.
- (3) Employees should not have any personal information, belongings or documents erratically mixed with City records.
- (4) To protect the privacy of the employee, the auditor will not examine any personal information belonging to the employee.
- (5) Whenever possible, both the employee and the business unit manager/director should be present while the audit is being conducted.

viii. Instant Recognition and Coaching

- (1) As part of Austin Energy's continuing commitment to develop its workforce, instant recognition will be provided for individual employees and/or the entire business performing at exceptional levels during the audit process.
- (2) If an employee or business unit requires further coaching on a process, the auditor will provide the appropriate feedback in a small session with the employee's immediate supervisor and business unit manager/director.
- (3) This coaching will be informal and is not intended to be included as documentation in an employee's personnel file unless a pattern of negligence or low performance warrants such action.
- (4) Although no tangible recognition will be given by the auditor, supervisors are encouraged to document positive performance by the employee during the audit process.

ix. Scoring

- (1) A 75% score on the entire audit, Control and Confidentiality, combined is required in order for the business unit to successfully complete the assessment.
- (2) Any category on the RMCA is considered "Not Met" if three (3) or more standards are not met.
- (3) Any standards under development are not scored; thus the business unit is not held accountable for those.
 - (a) The overall score will be adjusted appropriately
- (4) Scoring on the confidentiality audit is based upon a majority of responses from each category.

x. Follow-up

- (1) After completion of the audit, the auditor shall notify the RA, RLO, and business unit leadership of the results within two (2) business days.
- (2) Detailed information on strengths and deficiencies shall be thoroughly documented and business unit leadership will be provided with a completed copy of the audit form.
- (3) Audits for each business unit shall be compiled and reported in summary to their respective division executives.
- (4) An overall progress report will be made to the Austin Energy Executive Team on annual basis.

xi. Unsuccessful Audits

- (1) Any audit scoring below a 75% is considered unsuccessful.
- (2) Detailed information regarding deficiencies and suggestion for addressing them will be included as part of the completed audit form submitted to the business unit leadership.
- (3) The business unit will have fourteen (14) working days to prepare and submit an action plan on how any deficiencies will be addressed.
- (4) The action plan must be submitted in writing to the RLO for review.
- (5) The RLO will work with the business unit to overcome deficiencies identified as a result of the unsuccessful audit.
- (6) A follow-up audit will be conducted ninety (90) days after the first unsuccessful audit.
 - (a) If the follow-up audit is successful, that score will replace the existing unsuccessful score.
 - (b) If the follow-up audit is also unsuccessful, a report will be made to the RA and Division Executive identifying specific areas of repeated deficiency on the part of the business unit.
 - (c) The business unit will have thirty (30) calendar days to correct any deficiencies outlined in the audit before a final make-up audit is conducted.
 - (d) If the final make-up audit is completed successfully, the score will replace any previously unsuccessful audits.
 - (e) If the final make-up audit is unsuccessful, a resolution meeting will be called to include the following:
 - (i) RA
 - (ii) RLO
 - (iii) A representative from RMS
 - (iv) Business Unit RC

(v) Business Unit Director/Manager

(vi) Division Executive

- (f) The purpose of this meeting will be to identify actions required to successfully complete a records management audit.
- (g) If the business unit successfully completes a fourth audit, the score will replace any existing unsuccessful audits.
- (h) If the business unit continues unsuccessfully meet records management guidelines, the business unit executive must take additional administrative action which they deem appropriate to address noted deficiencies.

b. External Audits by Records Management Services (RMS)

- i. RMS reserves the right to conduct an annual review of the Record Management Program at Austin Energy as they deem necessary.
- ii. The results of this audit will be forwarded to the department for review by the RMT.
- iii. The department will submit an action plan for addressing the deficiencies identified during the RMS Audit.
- iv. The RA/RLO will be responsible for incorporating any recommendation into the policies and procedures of the Records Management Program within the Department.
- v. RMS will report the status of the Austin Energy's compliance with COA and Departmental Records Management Policies and Procures to the City Manager on an annual basis.

Approvals

Contact Person: Dustin D. McLemore, MPA

Title: Records Liaison Officer

Signature _____

Phone: 512-505-3777

Approved : Andy Perny, Division Chief Title: Records Administrator
Legal Services

Signature: _____

Revision History

Version	Date	Revised by	Comments
1-B	7/15/08	Cynthia Hayes	Review by Legal Services
1-C	7/20/08	Jannette Goodall	Reviewed by Records Management Services
1-D	7/20/08	Dustin McLemore	Pre-approval edit

Appendix 2: Focused Interview for Experts

Query
1.) Are all of the components listed in the ideal model relevant to a records management program for Texas Public Utilities?
2.) Please consider the sequence of elements within the ideal model. As presented, does the model present a logical progression of steps within an ideal records management program? If not, what should be changed?
3.) Please review the elements in the “System Design” component. Should any be eliminated? If so, which one(s)?
4.) Please review the elements in the “System Design” component. Should any be added? If so, what?
5.) Please review the elements in the “Establishment of a Records Management Plan” component. Should any be eliminated? If so, which one(s)?
6.) Please review the elements in the “Establishment of a Records Management Plan” component. Should any be added? If so, what?
7.) Please review the elements in the “Establishment of a Records Management Team” component. Should any be eliminated? If so, which one(s)?
8.) Please review the elements in the “Establishment of a Records Management Team” component. Should any be added? If so, what?
9.) Please review the elements in the “Retention and Control Schedule Management” component. Should any be eliminated? If so, which one(s)?
10.) Please review the elements in the “Retention and Control Schedule Management” component. Should any be added? If so, what?
11.) Please review the elements in the “Inventory Management” component. Should any be eliminated? If so, which one(s)?
12.) Please review the elements in the “Inventory Management” component. Should any be added? If so, what?
13.) Please review the elements in the “Vital Records Management” component. Should any be eliminated? If so, which one(s)?
14.) Please review the elements in the “Vital Records Management” component. Should any be added? If so, what?
15.) Please provide any additional comments concerning the ideal model presented.
16.) Please provide any additional comments concerning the research project and or researcher.

Appendix 3: Notice of Privacy Practices

You are participating in an Applied Research Project by a graduate student at Texas State University. Participation in this project is completely voluntary and greatly appreciated. This project will be conducted under close supervision by the individual named as the research advisor listed on the below. You are not required to release any data that you deem personal or confidential. All information obtained will be used for statistical analysis only.

1. How we may use your data.

This information is elicited solely for statistical analysis only. No unauthorized reproduction is expressed or implied by any party in this project.

2. What data will be collected.

We are asking for your responses to the information contained on the questionnaire only. The participant information sheet is kept confidential and used only to contact you for future correspondence.

3. Who to contact if you have questions.

The point of contact for this research is:

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The research advisor for this project is:

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