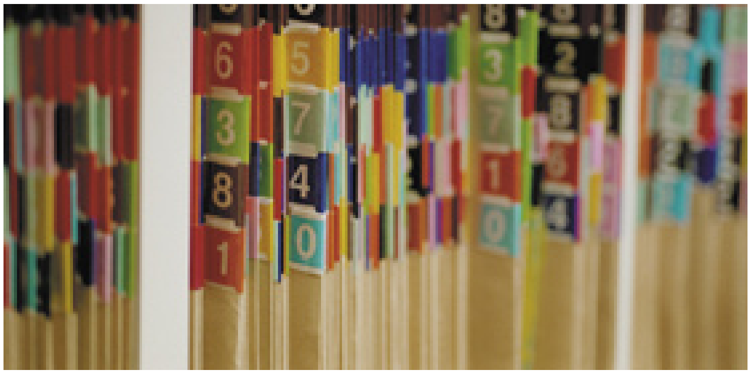

Records Management 101

By Peggy Nagel, CAPLAW

How many times have you gone looking for information that you know exists somewhere in your organization, spent hours looking for it and still can't put your hands on it? If your CAA is like most organizations, it has more files and documents than it knows what to do with.

Federal regulations require grantees to maintain records about even their most basic organizational activities and to be able to access and provide those records on demand. For example, the uniform administrative requirements for grants to nonprofit organizations (OMB Circular A-110, 2 C.F.R. § 215.53 (e)) state:

> The Federal awarding agency, the Inspector General, Comptroller General of the United States, or any of their duly authorized representatives, have the right of timely and unrestricted access to any books, documents, papers, or other records of recipients that are pertinent to the awards, in order to make audits, examinations, excerpts, transcripts and copies of such documents.

This can be an almost impossible requirement to meet when federal monitors request records, unless you have a system for categorizing and storing your records so that you can easily access them.

Compliance with these regulations is just one of the many good practical reasons to create a record information management system (RIM) for your CAA. Good records management is not just having a record retention policy (though that is an important step in the process and CAPLAW's model policy page includes a sample record retention policy. A good record information management system allows you to organize and store your records in a manner that is easy to understand, simple to maintain, and offers immediate access to the information you need.

Determining What Is a Record

Not all of the data and documents your organization receives or creates are records. For this reason, the first step to take in creating a Records Information Management (RIM) system is to determine what information you are creating, collecting, and storing, and how much of that information qualifies as records. A "record" is typically defined as any documentation or information created and stored at an organization that is essential to the functioning of that organization, regardless of the format or medium. Records are the evidence of what your organization does. Records control, support, or document the activities and transactions of your organization.

Remember that records come in many formats:

- Physical records on paper, such as memos, contracts, personnel files, time cards;
- Physical records such as video and audio recordings;
- Electronic messages, such as email content, email attachments, and instant messages;
- Content on your organization's website, as well as the information that resides on servers, shared drives, computer desktops, portable computers and mobile devices; and/or
- Information captured in the organization's various databases.

So how do you determine whether the documents and data you are storing are records? Using the following guidelines can help you to answer that basic question.

Your document probably IS a record if you answer "yes" to any of the following questions:

- Is it evidence of a decision made or decision making process used to make a decision?
- Does it authenticate or affirm the truthfulness or accuracy of information about the organization, its activities or its employees or agents?
- Does it commit the organization to or document an action (payment, expenditure, work to be carried out)?
- Is it evidence of something for which the organization is accountable to the public?
- Is it evidence that can be used for audit or legal purposes to prove the organization complied with a policy, procedure or standard?
- Is there any law, regulation or other requirement that says the record must be kept?
- Is it part of a series of documents providing an evidentiary chain?
- Is it seeking or providing information that might be used for decision-making?
- Does it document, explain or clarify the history of the organization?

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Your document is probably <u>NOT</u> a record, if you answer "yes" to any of the following questions:

- Is it a rough working paper and/or calculations created while preparing an official document?
- Is it a draft not intended for further use or reference?
- Is it a duplicate copy of material retained for reference purposes only, where the official record is maintained in some other department?
- Is it published material that is not an integral part of the organization's official activities or history?
- Is it a "printout" or "hard copy" of data that is maintained as a record in another format (unless a hard copy is either required or contains additional information)?
- Is it a word processing document or spreadsheet in electronic format that has been printed and filed as a record?
- Is it a brochure, catalogue, price list, promotional material, etc. received from external sources (except where this material is used as the basis for a purchasing decision)?

Storing and Organizing Records

To develop a working filing system you need to identify your organization's business activities and the records they generate, and group them together.

Once you have determined that the information is a record, the next step is to determine where it should be stored, and how to organize and label it so that you can find and access it when needed. Often this is clear — for example, paid invoices are clearly records, and they would typically be stored in the finance department and organized by fiscal year and then by vendor or supplier. But in many cases it is not so simple to determine how to organize your files – for example, a contract with a consultant for work on a federal grant is clearly a record, but it might logically be filed in several places; in the grant files, in the legal department, in the finance department, or in the procurement department. Sometimes filing copies of it in multiple places may make sense if different departments need access. This is why it is important to create a filing system that can be implemented across the organization.

A filing system is a logical method to classify and organize records. The essential requirements of any filing system is that records are organized and grouped together in a manner that is logical, consistent and allows them to be easily found, used and eventually disposed of, or stored permanently. To develop a working filing system you need to identify your organization's business activities and the records they generate, and group them together. Records can be grouped together in many different ways.

Record Grouping Suggestions

Organizational Method	File Type
Alphabetically	Personnel records, client files
By Subject	Grant or program files
Chronologically	Accounting records, financial material (such as purchase orders and bills), year-end reports
Geographically	Appropriate if you have different office or program locations
Tickler files	Good for tracking records that need to be reviewed and updated, such as background checks

Creating an Organization-Wide Filing System

Once you have settled on a logical filing system for the records of each of your organization's activities, the next step is to create a written records management policy that describes the organization-wide file and labeling plan (the master file plan) that everyone in your organization understands and can implement. If different departments or programs are unclear or inconsistent in how they label and file a record then any system that you set up will quickly deteriorate. For example, if your master file plan policy states that paid invoices should be labeled in the following manner, fiscal year, accounts payable or receivable, then alphabetical by vendor, then it is critical that this file plan is followed across all programs and departments, whether the invoice is for human resources' office supplies or Head Start professional services. Unless everyone in your organization who handles records understands and uses the same clear and consistent labeling and filing system, it will be impossible to organize and store your records in a way that is easy to understand, simple to maintain, and allows easy access to the information you need. You may want to consider using a system like SharePoint or a shared drive to make certain records, like contracts, accessible to a select group of staff in a more formal manner than individual electronic files.