
LIS 9203 – Records Management

Assignment #3: Records Retention and Disposal

Records retention and disposal seems, by many, to be considered the most important function of a records management program. I think the reason why this over-emphasis occurs depends on the size and type of the organization. I worked in the financial district in Toronto, where even the price of a square foot of office space could be astronomical, and management wanted productivity occurring in those areas not storage. In circumstances like the one described above it is easy to see why some may take the approach of holding on to only those things absolutely necessary. On the other side of the coin a small organization or business might not have the wherewithal to figure out what they need to keep, or not, so they may just hang on to everything. In that case we see someone over-relying on retention. To a degree I think that anxiety, either over the sheer volume or privacy concerns, plays a role in why many consider retention and disposal to be the most important facet of records management. Doing a literature research for this paper yielded a result positing whether or not emails are manageable as records is telling (Owen, 2010). If a journal aimed at information professionals is examining whether performing record management on emails, as one example of high volume material, is unwieldy (Owen, 2010) I can only imagine what people outside of the field think. I also found a journal article directed at optometrists discussing the retention of their patient records and, the general sense from reading it, is that they are uncomfortable being quasi gatekeepers on that information (Ortmann-Vincenzo, 2007).

In my estimation the examples listed above, while not comprehensive, leads me to believe that need for informed retention and disposal policies far exceeds the perceived

expectation that deciding what to keep and what to toss will address those issues. Thinking specifically of informed retention and disposal policies though, prior to taking this course, I too would have said I think it is the most important part of records management. Having been now in the course for a while now, and really taking the time to understand the record life cycle and information as a company asset (Stephens, 2007) I think my viewpoint has changed. With that being said I still think the prevailing notion is that records retention and disposal scheduling takes precedence in the eyes of many which has a negative effect on other records management functions.

I think the over-emphasis on retention and disposal scheduling can actually negatively affect the process itself. Or can lead to organizations making policies with retention and disposal their singular focus rather than what is actually best for the treatment of those records. One example I saw in my professional experience of management being too eager to rid themselves of records was in the digitalization of paper documents. Disposing of paper precedence over several other key elements record management functions like access, inventory and retention. Saffady (101-2, 2002) has a section relating to images of paper documents and, more specifically, situations where they may stand in place of the original or are views as an authentic reproduction. I think the idea being presented here is that organizations scanning paper documents, as images, then feel comfortable destroying the original which may be too hasty a decision for a variety of reasons. For starters Saffady (2002) gives the impression there is either ambiguity, or uncertainty, how a digital image of a paper document would be treated in a legal setting and, especially, if the original was destroyed. Stephens (43-4, 2007) echoes this concerned, although not directly for this issue in particular, in that records managers need to be especially mindful of retention and destruction in regards to their legal obligations. For example

Saffady (101-2, 2002) argues that the only way this could work is if the digital image of the document was of such a high quality to make it almost indistinguishable from the original. Saffady (101-2, 2002) calls this “loseless” or that nothing ought to be lost in making the copy. In my experience of making several thousand of these images per day a fair portion of these reproductions suffered a loss in quality and, sometimes, so much so that we would have to ask the creator to produce another copy for scanning. In most cases these were mostly incidences of information being cut off by the scanner or some other digital artifact but there were times where I would suggest we were willfully degrading the quality of the original. For example colour photos, stills from security videos, or colour coded medical documentation were scanned into the system, in black and white, and the original destroyed thirty days later. In the vast majority of these occurrences the digital reproduction was almost unrecognizable and could not be used by staff in their adjudication roles.

While researching this paper there seems to be an immense emphasis placed on the legality around records retention and disposal scheduling, so much so in fact, that I would argue many are only interested in records management programs to meet their jurisdictional or regulatory requirements with this function in mind. For example, when writing to medical professionals and not records management, Ortmann-Vincenzo (2007) strongly suggests that the main reason to retain patient records is to protect themselves from future lawsuits. I think this type of mentality, even if warranted, detracts from the overall value of a records management protect. Ortmann-Vincenzo (2007) focuses intensely on the bad things that could happen if optometrists do not have a proper retention and disposal scheduling rather than the value added from a records management program. For example having a well inventoried collection of patient records could potentially aid doctors in making future medical diagnosis which a patient

may benefit from. I think that people in the field see how records retention and disposal scheduling fits into a larger records management program rather than being a means to an end. For example Myler (54, 2006) argues that having informed retention and disposal scheduling helps to ensure rapid access and retrievability as well as enhance management decision-making capabilities. With that being said we see the legality pushed the forefront, which is not to underscore the importance of such, as one of Myler's (54, 2006) key reasons to have scheduling program is to "decrease vicarious liability" and protect the organization from lawsuits. Both Saffady (2002) and, in particular, Stephens (43-44, 2007) weave complying with the law, not just in letter, but also following the spirit of the legislation and acting in good faith almost inseparability into records retention and disposal scheduling. Again not to say this is unimportant, it certainly is, but I think the heavy emphasis on meeting regulatory requirements, especially by those in the field, helps to perpetuates the idea this is the most important function of records management. Consequently I think you see other functions devalued or ignored, as we do by Ortmann-Vincenzo (2007), because legal underpinnings are discussed with much more rigour than the positives of effect records management.

I also think that the "why" questions of why records are being retained, and for how long, and others are not also gets lost in this emphasis, for whatever, on the perceived need to do so. For example Vaughan (2007) worked within a library to help them draft their record retention schedule and often found himself elaborating as to why not all records had the same retention time and why other records warranted an extended retention period. Furthermore these differences were not due to any legal or regulatory requirements, but rather, were integrated into the function of why the record was created in the first place. In one circumstance the working group, as Vaughan (211, 2007) calls them, had to stop them from disposing of records before the

end of their life cycle. More specifically the working group would have been disposing of patron checkout records while that person still had the book, which is information obviously critical for the library to function and maintain their collection (Vaughan, 211, 2007). I think this scenario highlights that, in the eagerness to focus on retention and disposal, sometimes people can lose sight why they need record management. Here we see records being pegged for disposal early in their lifecycle, when they are still needed for reference activity.

In this paper I considered some reasons why many believe records retention and disposal to be the most important function of a records management program. They can stem from genuine concerns like a lack of space, uncertainty about regulatory requirements or anxiety regarding volume of records being created and uncomfortableness with holding on to that material. I argued that while I personally disagreed that retention and disposal are the most important function of records management I believe that the commonly held perception that it is has a negative effect on other facets of the practice. In my personal experience I saw original paper documents destroyed in favour of their reproductions as digital images. In that case there was not a loseless of quality which Saffady argues is imperative to be a viable option. We also saw that the emphasis on this particular function overly focused practitioners on the legalities of the records management rather than the practical benefits of having those programs. Lastly we looked at a real world example of library staff not fully appreciating what records management was, and why it was important, because they over-emphasised retention and disposal. So much so that they almost had a program in place which disposed of records early in their lifecycle which were integral to the operation of the library.

References

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