### Museum of Modern Art

Records Management Policy | Last revision April 6, 2016

A coordinated approach to electronic records management is required for the immediate and long-term retention of MoMA's records. These efforts must encompass the entire lifecycle of digital information to protect records from degradation and loss, establish authenticity of recorded information, and manage resources for storage, handling, and use of Museum records.

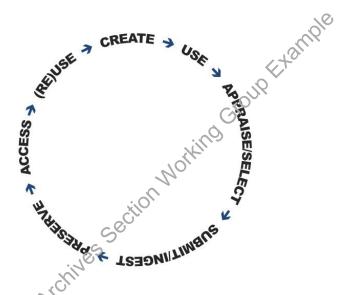


Fig. 1 – Electronic records lifecycle, based on the DCC Curation Lifecycle Model

At all points in this cycle, our actions influence the ability to continue the cycle. To ensure we are able to later discover and use our digital records, we must first establish identifying and contextual information through naming and arrangement at the point of creation. This information informs selection for long-term retention, storage protocols in preservation, and the ability to identify and understand files when accessed later. The intertwining of these aspects of electronic records management makes the entire process a collaborative exercise. MERA is positioned to provide oversight and management at all points, providing the necessary resources, tools, and governance to ensure the ongoing effective of the Museum's electronic records management activities.

### **Operational Optimization**

While the collection and management of electronic records is a valuable outcome of the MERA program, this is not the sole benefit. The continued growth of the Museum's electronic record holdings, widespread duplication of individual records and images, and disorganization of

records in storage contribute to operational inefficiencies. Bringing a more thoughtful approach to management of our digital files (and records) is central to the improvement of institutional operations within a digital environment. MERA seeks to establish practices that are:

- Coordinated within and across Museum departments, facilitating exchange of records and eliminating the need to duplicate information
- Consistent in application from department to department, enabling better understanding of Museum records across departmental lines
- **Continuous over time**, mitigating the loss of institutional knowledge due to turnover and enabling flexibility in light of changes to institutional practice or infrastructure over time

Such practices are implemented towards the long-term management of the Museum's electronic records, but also to make the workplace more efficient and effective. By introducing best practices into the Museum's operations, staff may coordinate their use of digital workspaces while actively preparing their records for long term preservation and reuse through MERA.

# **Records Management Resources**

MERA provides the following resources and tools to inform decision making and institutional practice pertaining to electronic records management.

- Retention schedules Records classification criteria with corresponding retention periods
- **File structures** Recommended organizational frameworks for arrangement of departmental records
- **File and email management guidelines –** Recommended practices for arrangement of digital files and email, as well as file naming guidelines
- Weeding guidelines identification of non-records materials scheduled for immediate disposal
- Upload Wizard and Preservica Tools to facilitate transfer of records to the MERA repository and long-term preservation and access.

#### Retention Schedules

MERA formulates and issues retention schedules specifying the length of time institutional records are to be kept and identifying which records are to be transferred to the Archives. The Museum's retention schedules are developed and maintained by the Archives in consultation with Museum departments.

Record series classifications are assigned to each department's records according to general business functions and outputs of the unit. Each record series may be scheduled for permanent or temporary retention. Temporary record series may be kept until no longer needed by the

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department, unless otherwise specified in the schedule. Permanent records are assigned a deadline by which records must be submitted to the Archives.

All Museum records should be retained and disposed of in accordance with assigned retention periods, related guidelines, and any related policies, procedures, or directives the Museum issues. Records scheduled for permanent retention or extended temporary retention (as defined in the schedule) must be submitted to the Archives within the timeframe specified. Temporary records should be discarded promptly when they are no longer useful to the department. Those temporary records scheduled for periods of retention within the Archives will be held until the expiration of their retention period, following which they will be re-assessed for continued retention or disposed of.

Materials not identified in retention schedules are considered non-records and may be disposed of in the general course of the department's operations. MERA provides guidelines on the identification and disposal of non-record materials in general weeding guidelines available to staff.

### Exceptions and Exclusions

All departments must comply fully with the Museum's retention schedules and discard records when their prescribed retention periods elapse except where destruction of specific records is temporarily suspended for pending or ongoing litigation, government investigation, audits, or other reasons determined by the Museum's General Counsel.

The General Counsel will notify departments when destruction must be suspended for specific records in their custody. Such records must not be destroyed until authorized by the General Counsel.

Federal and State law prohibits the destruction of documents, including the deletion of emails or voicemails, which may contain information relevant to pending or ongoing investigations, litigations and similar proceedings. If a department is aware of a potential, pending or ongoing investigation or litigation, and the department possesses records that may contain relevant material, these materials must not be destroyed unless authorized by the Office of the General Counsel, which must be notified immediately.

#### Extensions to Retention Periods

Upon the written request of a Museum department, the Archives will authorize the extension of retention periods for specific records for up to one additional year in any of the following circumstances:

- Where retention periods for the records are being reconsidered or revised
- Where the records are needed for completion of audits or program reviews

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 Where the records are needed for exceptional and demonstrable reasons that were not foreseen at the time the retention periods were determined

#### File Structures

File structures provide recommended organizational frameworks for each department's files. These are generated through collaboration with each department, incorporating best practices into the existing organizational practices of the unit.

A file structure proposes hierarchical directory structures, to be applied in departmental and shared storage spaces, that apply or further refine the record series identified in the retention schedule. These frameworks are provided to encourage records management during the routine activities of staff through application of a formal framework that groups files belonging to individual projects and concepts (e.g., departmental resources, administrative documents) into folder hierarchies that provide contextual information about their contents.

Recommended structures are to be used in conjunction with MERA's file and email ction working management guidelines to inform their creation and use.

# Departmental Responsibilities

### **Departmental Coordinators**

Each Museum department should designate a MERA coordinator to serve as the department's liaison to the Archives and to oversee application of MERA procedures and guidelines.

The Department Coordinator is responsible for coordination of an annual submission period for the department, during which shaff will prepare and submit their electronic records. In preparation for the scheduling and completion of this task, Department Coordinators must complete the following:

- In collaboration with the Archives, assess the current state of records in the department's storage and estimate time and effort required to prepare records for submission
- Determine whether an extension of the submission deadline is necessary to provide additional time for preparation and submission
- Review up-to-date retention schedules and weeding guidelines with staff to ensure proper implementation when preparing records

Department Coordinators must contact the Archives if an extension to the submission due date is required to accommodate conflicts in the department's schedule.

<sup>&</sup>lt;sup>1</sup> If preferable, staff may actively submit records in the course of their ongoing departmental activities.

### Governance and Revision

If the department disagrees with the retention schedule, file plan, or other guidelines, it must notify the Archives through the Department Coordinator or via comments on the MERA program staff site. Requests for alteration must contain details regarding the reason for the request and proposal of the necessary alteration.

Archives representatives will meet with the Department Coordinator and staff at the earliest possible convenience to review and discuss implementation of alterations to the schedule or file plan. Approval of changes will be determined by Archives staff in consultation with the Department Coordinator. Approved changes will go into effect immediately and apply retroactively to all records currently held by the department and the Archives.

The Archives also conducts periodic review of retention schedules every two years with the Department Coordinator and interested staff to determine whether current specifications should be altered or expanded.

#### Records Transfer

Permanent Museum records (and extended temporary records) are to be transferred to the Archives for long term management, preservation, and access. Records collection is strictly limited to those records identified in retention schedules. Non-permanent records submitted to the Archives will be returned to their departments and submitted copies will be disposed of.

# Records Disposal

Museum records must be disposed of in a manner that is safe and appropriate to the content of the records:

- Records without confidential information may be deleted through use of a computer's
  Trash or Recycling Bin. Back up copies in the Museum network will be purged every 30
  days according to IT policy.
- Records containing confidential information must be deleted in a manner that renders them unreadable and unusable. Appropriate measures must be taken to ensure the security and confidentiality of such records during all phases of the deletion process.
- Record disposal includes deletion of all copies, including electronic and paper copies.

Temporary Museum records must be retained in accordance with their retention schedules and disposed of promptly when that period elapses. Disposal of these records may proceed without approval.

Temporary records maintained for extended periods in the MERA repository are disposed of or appraised for extended retention or disposal according at the end of their retention period. The

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Archives will notify departments when records in the MERA repository require appraisal and consult with the office of record to determine the appropriate course of action. Records will be retained if they they remain valuable for operational, legal, or research purposes.

No further alterations to submitted records should be made following transfer to the Archives. After submission, copies of records remaining on Museum storage may be disposed of by Museum staff.

### Access to Museum Records

Records in Archives' custody will remain available to their originating departments, and other authorized persons, for access as needed. Materials of a confidential or sensitive nature should be identified as such upon submission and will remain closed to access unless appropriate permissions are granted by an authorizing party.

# **Email Records Management**

Email correspondence is an essential component of MoMA's day-to-day activities. It encompasses all aspects of routine Museum operations, including internal administrative messages, outreach to Museum patrons, and coordination of exhibition logistics between departments and external parties. Email correspondence is a valuable record of the Museum's activities and requires a corresponding management approach to enable long-term preservation and access to this information.

The volume of messages sent and received and various uses of correspondence complicates this effort. It is not the expectation or intention of MERA to collect and preserve all incoming and outgoing messages. An effective strategy must take into account the rapid proliferation of messages and set clear boundaries for the retention and disposal of appropriate messages. MERA's strategy takes two distinct forms to manage the Museum's email correspondence: broad collection of the accounts of senior staff (Capstone approach) and targeted collection of tagged email messages in lower level staff accounts. In this way, the Archives maintains a representative collection of the correspondence of the Museum's leaders and decision-makers, as well as more detailed correspondence that illustrates the operations of Museum programming.

# Identifying official records

The ability to share and route messages to many users with ease (via copying, replying, forwarding, etc.), generates numerous copies of messages held by staff members throughout the Museum. Individual instances of these messages serve as the "official" copy of record to clarify the validity and authenticity of important correspondence and limit the number of duplicate messages managed by the Archives. Official copies are identified according to the following criteria:

- When a message is distributed within the Museum, the sender's copy is the official record.
- If correspondence is received from an outside party (such as a lender or contracted photographer), the primary recipient's copy, not those cc'ed, is the official copy of record.
- Messages within a long thread of replies are retained as a group. A copy of the entire thread, held by the final primary recipient, is the official copy of record.
- Forwarded messages with added substantial informational value must also be retained as official copies of record.

Duplication of email records is inevitable, but efforts are made to single out individual copies for retention. MERA processes email messages in its digital preservation and access processing software to identify official copies to the best of its ability.

# Capstone Approach

MERA's primary email management strategy is based on the the Capstone Approach<sup>2</sup> created by the National Archives and Records Administration (NARA). Capstone emphasizes collection at the account level, to "allow for the disposition of clearly temporary accounts while identifying and capturing permanently valuable email accounts." Individual user accounts are assessed for their operational and historical value and the user's position in the institution. It is assumed that valuable messages are sent to the inboxes of senior staff and by collecting these accounts in total, a comprehensive set of correspondence records will be saved.<sup>4</sup>

To fill gaps in the accounts of senior staff, lower level staff are targeted for select collection of correspondence related to Museum programs (e.g., exhibitions, special events, education) or departmental functions (e.g., general inquiries, artist correspondence, development and fundraising, etc.). MERA collects only those messages identified (using labels or folders in inboxes) as relevant to these programs or activities. MERA provides instruction on the identification and management of messages in a user's account through general guidelines and user training.

# Departmental Responsibilities

Arrangement of email correspondence

Capstone-level employees are not required to actively arrange email correspondence for collection. Complete accounts are collected encompassing all labels, folders, inboxes, and sent mail.

At the request of the Capstone-level employee, email collection may be limited to specific labels or folders in a Capstone-level user's account. This approach requires active and consistent arrangement or labeling of correspondence to ensure collection of relevant email records. If application of this approach is deemed inconsistent, collection of the complete account may resume or the Archives may identify a new approach for future collection in collaboration with the Capstone-level staff or their assistant.

Non-Capstone-level staff identified for limited collection must actively organize or label email correspondence for collection. Guidelines for application of labels or folders in Gmail can be found <a href="https://example.com/here">here</a>. The Archives and IT also provide regular training on best practices for labeling and arranging correspondence in Gmail.

<sup>&</sup>lt;sup>2</sup> http://www.archives.gov/records-mgmt/email-management/final-capstone-white-paper.pdf

<sup>&</sup>lt;sup>3</sup> https://www.archives.gov/records-mgmt/email-management/capstone-workshop.pdf

<sup>&</sup>lt;sup>4</sup> Non-record correspondence, including personal information, is identified using available technology and disposed of.

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### Disposal of correspondence

The Museum prohibits unauthorized destruction of its records, including correspondence. Permanent correspondence records must be retained until collected by the Archives. Notification of email collection is sent following the completion of ingest into the MERA repository. Correspondence may be disposed of in the regular course of Museum business following notification.

Non-record correspondence (e.g., personal messages, routine administrative correspondence, messages for sharing attachments) may be deleted when no longer useful to the user. Weeding quidelines are provided to inform the identification and disposal of non-record correspondence.

Correspondence must be disposed of completely by moving messages to an account's Trash folder. The Trash folder is automatically scheduled to permanently delete messages 30 days following removal from the user's Inbox. User's may rely on automated deletion or actively empty their Trash to free space in their account. Backup copies of deleted messages, maintained by IT in Google Vault, are subsequently disposed of following the expiration of the iou Moikiug, default retention period in Vault.

# MERA Responsibilities

#### Identification of user accounts

Staff in leadership and management roles throughout the Museum are considered Capstone-level users whose accounts are collected in total. This designation includes trustees, directors, curators, and department managers.

The Archives works with each department to identify staff members for targeted collection of messages. Targeted staff members should be those with prominent roles in Museum programs (e.g., assistant and associate-level staff) and certain administrative duties.

# Email collection >

In collaboration with IT, MERA actively captures collections of emails (using Google's Vault service) according to the time periods specified in the Museum's retention schedules. Collection of email includes all incoming and outgoing correspondence identified as records by MERA and Museum staff, as well as calendar appointments,.

Following departure of any staff identified for email collection, MERA retrieves a final export of remaining messages not previously collected. If the staff member in question is part of the non-Capstone collection efforts, they must identify relevant messages prior to completion of their term with the Museum. User accounts are subsequently purged according to IT policies and timelines.

### Weeding of non-records correspondence

Due to the volume of messages sent and received by Museum staff, it is difficult for all non-record correspondence to be deleted prior to collection. To address this, MERA utilizes existing lexicons of common phrases and terms, created by Stanford University's ePADD project, to identify messages of personal, sensitive, or non-record status. Prior to initial ingests of correspondence, the Archives works with Capstone-level users to identify names and other terms to be added to the existing lexicon. This improves the ability to identify messages from common personal correspondents and those that address subjects of a personal or non-professional nature.

These messages are classified during ingest into Preservica, closed from access to any staff, and flagged for review. Flagged messages are assessed by the Archives (in collaboration with the corresponding user, as needed) to determine whether they are properly identified as non-record messages or improperly identified by the system. Those messages identified as non-records are disposed of following assessment.

### Preservation of significant properties

MERA commits to preservation of message information that is captured and transmitted by the email client, including:

- Transmission data: Includes system information identifying the sender, recipient, and date and time information, as well as valuable routing information (e.g., IP addresses of mail servers). This information is essential to establishment of a message's authenticity.
- **Message body:** The body of message contains the primary text of the correspondence, including any signature and previous text from the message thread.
- Attachments: Files attached to a message are considered part of that message's
  content. Attachments are retained and preserved together with the associated email
  message. The preservation of attachments is subject to MERA's standard preservation
  strategy and are monitored for authenticity, fixity, and format obsolescence.

Emails often contain links to external sites or documents that are not attached to the message. MERA does not commit, and likely does not have permission, to preservation of non-MoMA affiliated external resources linked to via emails.