

CASE #2

# Addressing Myopia

## Transition to Functional Scheduling at the State Archives of North Carolina

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OVERVIEW:

The State Archives of North Carolina (SANC) launched a functional scheduling initiative to redesign records retention and disposition schedules for state agencies based on the sixteen core functions of state government. Rather than following the model of most other functional schedules that separate common government functions from agency core functions, SANC focused on creating records schedules that are broadly applicable across agencies while also capturing the uniqueness of some government work.

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Appraisal | Disposition | Functional analysis | Records schedule

## Introduction and Institutional Context

In his 1841 essay “Self-Reliance,” Ralph Waldo Emerson wrote, “A foolish consistency is the hobgoblin of little minds, adored by little statesmen and philosophers and divines.” Clearly Emerson was a romantic and not a government employee, or he would have recognized the value of handling similar circumstances consistently rather than whimsically. Then again, perhaps government workers actually are romantics, because there does seem to be a tendency to view the world from one’s own silo rather than attempting to understand the commonalities of the work being done across agencies and even within one’s own agency.

In 1935, the North Carolina General Assembly passed “An Act to Safeguard Public Records in North Carolina,” which both defined public records in the state and placed the North Carolina Historical Commission in charge of regulating the destruction of public records. In those early years, the Historical Commission granted authority for destructions on an ad hoc basis, negotiating memoranda agency by agency. The State Archives of North Carolina (SANC)<sup>1</sup> began addressing the responsibilities of records management within state agencies during World War II by encouraging agencies to appoint chief records officers and convening a meeting for them in 1943. When SANC opened the State Records Center (SRC) in 1953—the first facility of its kind in the nation—it expanded its mission to include assisting state agencies with the temporary storage of inactive records. This prompted the writing of individual records retention and disposition schedules for state agencies, specifying which records were eligible for transfer to the SRC.<sup>2</sup> Each schedule identified the types of records produced or received at each level in the agency’s hierarchy, often tracking the movement of a document from one office to another during its lifecycle. Overall, tens of thousands of records series were identified, but many of these agency-specific series were rather duplicative examples of record types produced in all the agencies. Yet, as schedules were written or updated over time, these similar records series often wound up with varying disposition instructions; even within the same agency, a records series that in one office was considered archival in another might be scheduled for destruction after five years. This analysis is by no means an indictment of the work of the records analysts who created these schedules; rather, it is a recognition that working on schedules in a vacuum necessarily begat inconsistency.<sup>3</sup>

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<sup>1</sup> Since its inception in 1903, there have been numerous name changes to the entity in North Carolina responsible for preserving archival records. The North Carolina Historical Commission was renamed the Department of Archives and History in 1943. In 1971, legislation consolidated this agency into the new Department of Cultural Resources, which in 2015 was renamed the Department of Natural and Cultural Resources. Both in recognition of the existence of functions unrelated to archival records that fall under the umbrella of these agencies and to provide clarity, the name State Archives of North Carolina is used consistently throughout this case study, irrespective of the time period described.

<sup>2</sup> A 1959 amendment to General Statute 132 (Public Records Law) added to Section 8 a requirement that “When requested by the State Department of Archives and History, public officials shall assist the Department in the preparation of an inclusive inventory of records in their custody, to which shall be attached a schedule, approved by the head of the governmental unit or agency having custody of the records and the Director of the State Department of Archives and History, establishing a time period for the retention or disposal of each series of records.” North Carolina House of Representatives, “An Act Clarifying the Authority of the State Department of Archives and History to Conduct a Records Management Program for State Agencies,” House Bill 26, Session Law Chapter 68 (1959). This legislation influenced the early creation of retention schedules.

<sup>3</sup> For more information about these early years, the *Records Management Journal* (Autumn 1966) includes two relevant articles: H. G. Jones, “Public Records Management in North Carolina” (pp. 2–5), and Thornton W. Mitchell, “Records Management in North Carolina State Government” (pp. 6–10).

In an attempt to eliminate some of this overlap, SANC released a General Schedule for State Agency Records in 2000.<sup>4</sup> This records schedule sought to identify the records series common to most state agencies that should *not* be scheduled for transfer to the State Archives or for temporary storage at the SRC, grouping them under the categories of Administrative, Budget, Information Technology, and Personnel. Several hundred items were identified within these categories, and once the General Schedule was approved by the Department of Cultural Resources and the Department of Administration, the parallel examples littered throughout the agency-specific schedules were deleted, with the new General Schedule offering a more consistent mechanism for keeping the disposition instructions for these records series up-to-date. Items that needed to transfer to the SRC for temporary storage or that were destined to be transferred to the custody of the State Archives—regardless of their similarity across agencies—remained on the separate agency schedules as discrete series so that they could have unique numbers identifying them and facilitating their storage and retrieval.

## Narrative

Although records schedules had generally been format neutral, the explosion of born-digital records necessitated a reevaluation of how records were being retained. With few exceptions among North Carolina state agencies in the 21st century, gone were the days of file rooms staffed by clerks who neatly organized records into series. Sarah Koonts, the state archivist of North Carolina, and Rebecca McGee-Lankford, the assistant state records administrator, recognized opportunities for improvement of the current system for identifying and providing disposition instructions for state agency records. Multiple states employ functional analysis in developing records disposition authorizations (RDAs), but typically these RDAs incorporate both records that are unique to the agencies as well as records that are common to all agencies. Through her work with the Council of State Archivists, Koonts was familiar with the work done at the Vermont State Archives and Records Administration, where Tanya Marshall used a functional approach to create that state's first records schedules. As of the writing of this case study, Vermont has 22 general records schedules, along with numerous agency-specific schedules. Records analysts Kyna Herzinger and Courtney Bailey were tasked with investigating the work of Marshall and other practitioners of functional analysis to evaluate its utility at SANC. Russell Wood, the state records manager for the State of Washington, also provided some early guidance on his state's transition to functional schedules. Based on the Vermont model, SANC considered creating a functional schedule for each separate agency, but after talking with representatives from other states at the fall 2015 meeting of the Southeastern Archives and Records Conference, the SANC team decided that it would be preferable to have one set of functional schedules—not all of which would apply to every agency—rather than separate, agency-specific functional schedules.<sup>5</sup>

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<sup>4</sup> There were subsequent updates to this schedule in 2006, 2009, and 2015.

<sup>5</sup> In accordance with section 8 of the North Carolina Public Records Law, each agency will sign an agreement with the Department of Natural and Cultural Resources that identifies the functional schedules applicable to their work and records.

The Society of American Archivists' [A Glossary of Archival and Records Terminology](#) defines functional analysis as “a technique that sets priorities for appraising and processing materials of an office on the relative importance of the functions the office performs within an organization.”<sup>6</sup> Ultimately, three main issues supported the decision for SANC to transition to a functional approach for scheduling the records of state agencies:

1. **Volume.** The volume of state agency records, including both paper and born-digital records, is far too great for agency and archival staff to be able to inventory every specific type of record and analyze its appropriate disposition. As Hugh Taylor suggested, archivists should be “concerned with the recognition of forms and patterns of knowledge which may be the only way by which we will transcend the morass of information and data into which we will otherwise fall.”<sup>7</sup>
2. **Agency Creep.** Organizational hierarchies within state government in North Carolina have a particularly short shelf life. Agencies are reorganized in the name of greater efficiency or to carry out political agendas, so a group whose work has not substantively changed can find itself bounced around among multiple agencies—and then sometimes moved back to where it started. Keeping up with these changes has been a full-time job for records analysts but has rarely afforded the opportunity for reasoned evaluation of the records series. Revising the schedules to reflect these changes mandated by legislation has been difficult enough, and the internal reorganizations carried out by agencies have been captured in these agency-specific records schedules only when someone in the agency has proactively contacted their records analyst to describe the changes. As a result, many state employees have struggled to find the records series describing the records they produce because the hierarchical structures incorporated into the records schedules are sometimes substantially out of date.
3. **Big Buckets.** In a couple of situations where the needs and constraints of IT systems were the driving forces in the development of a records schedule, data administrators expressed a clear preference for “big buckets,” meaning that rather than describe individual records at a very granular level, the schedule should group similar records and assign them all the same disposition instructions so that they could be tagged in the document management system and their appropriate disposition automated.

Early on in this process, the records analysts at SANC contacted the chief records officer for each state agency and requested up-to-date information about the organizational structure of the agency, its mission statement and goals, and any other information that could shed light on the functions of the agency.<sup>8</sup> The responses to these requests were limited, so records analysts also began researching the General Statutes of North Carolina and the Administrative Code to

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<sup>6</sup> Society of American Archivists, “Functional Analysis,” *A Glossary of Archival and Records Terminology*, <http://www2.archivists.org/glossary/terms/f/functional-analysis>.

<sup>7</sup> Hugh A. Taylor, “Towards the New Archivist: The Integrated Professional,” paper delivered at the annual conference of the Association of Canadian Archivists, Windsor, June 1988, 7–8; cited in Terry Cook, “Electronic Records, Paper Minds: The Revolution in Information Management and Archives in the Post-custodial and Post-modernist Era,” *Archives and Manuscripts* 22, no. 2 (November 1994): 306.

<sup>8</sup> See the appendix for the text of this letter along with a sample agency functional analysis.

find legislation and rules defining agency functions or mandating the creation and/or retention of certain records. Agency websites were another useful resource for determining the mission statements and functions of agencies.

Another early step in this process was for records analysts to evaluate the tens of thousands of existing records series. This research was intended to identify which records series were currently slated for transfer to the SRC, either for eventual destruction or for transfer to the custody of the Archives. Some well-designed queries to the database and sorting of the output in a spreadsheet revealed over forty thousand distinct records series, with about 10 percent identified as archival. As records analysts sought to interpret this information, the potential pitfall was merely categorizing existing records series rather than focusing on the mandated functions of the agency and determining which of the records being created document those functions. Another problem was that the database could not explain gaps in transfers—which might have occurred because the agency was no longer responsible for that work, because the records were now created electronically (and the agency had no visible cue, such as overflowing filing cabinets, to trigger the transfer of these records to SANC), or for some other reason.

SANC’s initial inclination was to develop a set of common functions and another set of functions that affected only one or maybe a handful of agencies. The initial list of common functions was influenced by examples from the National Archives of Australia (NAA). Using their work as a springboard, Herzinger analyzed the current General Schedule for State Agency Records and determined which classes of records on the NAA list were common to all state agencies in North Carolina. Bailey then created a crosswalk from the current General Schedule to the new functional schedule skeleton, as a means of both confirming the representation of all of the series and creating a tool that would be useful in helping agencies transition to the new schedules.

**Table 1: Sample crosswalk from General Schedule to new functions and sub-categories**

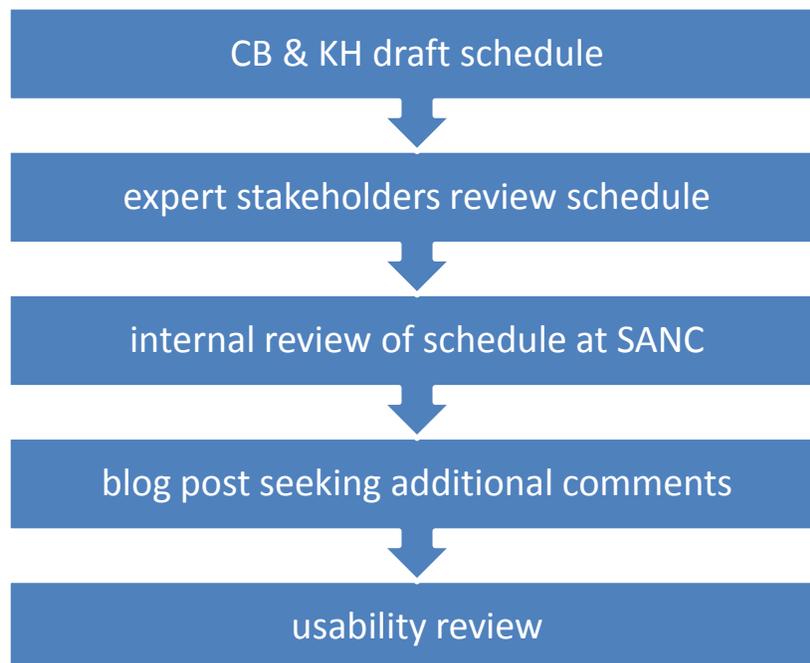
Series #	Series Title	Series Description	Function	Specific
G2	Accident/Incident Reports File{ XE "Accident/Incident Reports File" }{ XE "Incident Reports"}	Records concerning accidents involving agency employees, agency equipment, or other agency property. File includes employee and citizen accident and incident reports.	Risk Management	16.1 Accidents, Incidents, and Damage

Upon further review, it became obvious that this step of breaking the functions down into common functions and agency core functions resulted in artificial distinctions that unnecessarily complicated the situation. For instance, take audits: they are a common internal function across state agencies but are also a mandated function that the Office of the State Auditor performs on other state agencies. To prevent such redundancies, SANC decided to

coalesce all of the functions into one list. After a thorough review of the functional analyses of the agencies, sixteen functional categories were identified:

1. Agency Management
2. Asset Management
3. Economic Development
4. Education
5. Financial Management
6. Governance
7. Healthcare
8. Human Resources
9. Information Technology
10. Infrastructure Management
11. Law Enforcement
12. Legal
13. Monitoring and Compliance
14. Public Assistance and Support Services
15. Public Relations
16. Risk Management

SANC records analysts worked to identify the primary functions and sub-functions of each agency. Bailey and Herzinger divided the sixteen functional categories and, using the relevant lists of agency functions, identified which agencies' input was most needed to review each schedule draft thoroughly. A workflow was proposed that would allow for the development and implementation of these functional schedules within an eighteen-month period.



Several principles drove the creation of this workflow:

1. Bailey and Herzinger would be able to alternate the production of drafts, choosing functions based on individual expertise and relevant contacts with state agencies.
2. Stakeholders within state agencies would have numerous opportunities to participate in the process—from the initial functional analysis and the expert stakeholder meetings to the thirty-day open comments period on the blog and the usability testing. SANC hoped these opportunities would increase buy-in for the new schedules.
3. All sixteen schedules would not be in process at the same time. After two thorough vettings by expert stakeholders and by those affected within SANC, and the thirty-day comment period on the blog, Bailey and Herzinger would make all the necessary changes, and the individual schedule could then be laid to rest until it was time for usability testing.

## Conclusion

The process of drafting these functional schedules has been necessarily fluid. The biggest change came about six months into the process when Herzinger was chosen as the new archivist for records management at the University of Louisville. With four functional schedules drafted, Bailey had to readjust her work schedule to take on the creation, review, and revision of the remaining twelve schedules. It also became apparent that the deadlines for receiving feedback on the schedules could not be set in stone. While there are obvious advantages to allowing reviewers the flexibility to provide clarification and questions at their convenience, this has kept all of the schedule drafts in flux, which has hindered Bailey's ability to set finished drafts aside as the original workflow had intended. Another important recognition is that the original assignment of sub-functions and record types to functional categories was sometimes, of necessity, somewhat arbitrary; as more and more schedules have been drafted, series that initially appeared under one function have been moved to another function as that one is drafted. For example, auditing was initially a sub-function of Agency Management, but as the Monitoring and Compliance schedule was being written, Bailey realized that the reason audits are conducted is more closely related to the compliance function.

Although its overarching desire with the functional scheduling initiative has been to create schedules that are broadly applicable across agencies, SANC has had to accept that in North Carolina state government, there are instances where unique records are created by individual agencies. In order to integrate these into the new retention schedules without creating confusion, a compromise was designed whereby the description of the record type specifies the particular agency and a distinctive border around the item also calls attention to its unique nature. For example, the Governor's office has the sole authority to declare a state of emergency, resulting in the record type Declarations in the functional schedule for Risk Management:

**Table 1: Sample layout of new functional schedules**

RC No.	Record Types	Description	Disposition Instructions	Citation
1622.1	Asbestos Management Plan <sup>9</sup>	risk assessments, management plans, and abatement/removal records	RETAIN UNTIL: building is demolished PLUS: 1 year THEN: Destroy  <i>NOTE: If building is sold, transfer records to new owner.</i>	<u>Retention</u> 29 CFR 1910.1001(j) (3)(ii)
1623.A	Declarations	records concerning disaster and emergency notifications, declarations, and rescissions issued by the Governor	PERMANENT (archival) ∞	

Despite the recognition that some records series cannot apply to more than one agency, SANC reconfirmed that the benefits from having all agencies use the same set of functional schedules outweigh any such complications.

Undoubtedly the most complicated factor in this process has been trying to determine records ownership. In many cases, one state agency either submits to or shares information with another agency; in a records management sense, the primary concern should be scheduling the appropriate retention and disposition for the original record, with all other versions considered reference copies that can be destroyed when their reference value ends. However, it is not always obvious to the agencies involved, and certainly not to anyone else, which agency is legally responsible for such records. When these records are stored in data warehouses, questions of custody multiply.

Despite the complications, the work of developing these functional schedules has been rewarding. Diving into the statutes and codes to learn about the responsibilities and obligations of the various state agencies has been quite an education. Developing good working relationships with numerous state employees has been instructive in terms of both the work they do in particular and how state government works in general. The participants in the expert stakeholder meetings have also expressed their appreciation of the opportunity to discuss how common functions are carried out in various agencies. Some agencies have been quite avid participants, recognizing functional schedules as a more workable solution to records management and seizing the opportunity to shape their own destinies with regard to records scheduling. Several agencies also took it upon themselves to crosswalk their existing agency-specific program schedules to the new functional schedules, which provided a mechanism for

<sup>9</sup> This record type provides an example of one that applies to all state agencies to contrast with the one specifically for the Office of the Governor.

gauging the usability of these new schedules. This process has also afforded the opportunity to reappraise some records series that decades ago were designated as archival but that neither the creating agency nor SANC still considers worthy of permanent preservation.

## Discussion

- How do state statutes or other requirements affect the creation and design of records schedules?
- How granular do these new functional schedules need to be?
- How can agencies provide constructive feedback on drafts of these new schedules?
- How will agencies acknowledge their responsibility to comply with these new schedules? Will the schedules be dynamic, so that as agency functions evolve they can manage these new records based on existing disposition instructions already in the functional schedules, or will a specific approval process be necessary in those cases?
- What sort of training will be necessary to assist agencies in their transition from the existing General Schedule and agency-specific schedules to the new functional schedules? And when should this training occur (i.e., before or after the rollout of the schedules or both)?
- Will it be necessary for SANC records analysts to crosswalk all existing items from the General Schedule and agency-specific schedules to these new functional schedules, or will the agencies be able to interpret how their existing records series fit into the new scheme?
- Should databases/data warehouses be scheduled as records, or is the data itself that is entered the record that needs to be assigned a retention period and disposition?
- What's the best way to test the usability of a records schedule?
- How can SANC help agencies to understand better which records have archival value?

## Appendix: Sample Letter and Agency Functional Analysis

### *Sample Letter*

Dear Chief Records Officer:

At the annual meeting of Chief Records Officers, which will be held April 28, 2016, the Government Records Section will be introducing a new initiative to simplify records retention schedules and the scheduling process. This new methodology begins with an analysis of the functions of your agency then determines the records that are produced to document these functions. Our goal, in part, is to create records schedules that are not dependent on the ever-changing organizational structures of state government but instead focus on the work being done.

The Department of Natural and Cultural Resources has a mandate, found in G.S. §121-5(c), to assist public officials and agencies in preserving and disposing of the public records in their custody. In preparation for the CRO meeting, we ask that you review the attached summary of your agency's primary functions. This represents my attempt to identify the major functions of the Department of Justice along with the major activities your agency performs in order to accomplish your statutory mandate or mission. Please review this list carefully to ensure:

1. That I have not overlooked any of your agency's key functions
2. That I have not included functions that are not performed by your agency
3. That nothing else is incorrect

You are welcome to respond to this functional analysis of your agency via e-mail or phone call, or you can provide feedback at the CRO meeting. We will be presenting an overview of these new functional schedules at that time and will divide into breakout groups for discussion. If your agency or any of its divisions has performed a functional analysis or similar work, we would be interested in seeing your analysis as well.

Realizing that your time is valuable, we appreciate your constructive feedback and thank you in advance for your assistance.

Sincerely,

[Records Analyst]

**Functional Analysis: Department of Justice**

<b>Functions</b> <sup>10</sup>	<ul style="list-style-type: none"><li>• Provide legal representation to state agencies</li><li>• Assist local law enforcement in fighting crime and prosecuting cases</li><li>• Provide training and standards for law enforcement</li><li>• Protect North Carolina consumers</li></ul>
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Additional programs, divisions, and entities with specific powers and duties defined by legislation (and that receive administrative oversight from the Department of Justice):

<b>Attorney General</b> <sup>11</sup>	<p><b>Duties include:</b></p> <ul style="list-style-type: none"><li>• To defend all actions in the appellate division in which the State shall be interested, or a party, and to appear for the State in any other court or tribunal in any cause or matter, civil or criminal, in which the State may be a party or interested.</li><li>• To represent all State departments, agencies, institutions, commissions, bureaus or other organized activities of the State which receive support in whole or in part from the State.</li><li>• To consult with and advise the prosecutors, when requested by them, in all matters pertaining to the duties of their office.</li><li>• To give, when required, his opinion upon all questions of law submitted to him by the General Assembly, or by either branch thereof, or by the Governor, Auditor, Treasurer, or any other State officer.</li></ul>
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<sup>10</sup> <http://ncdoj.gov/About-DOJ.aspx>.

<sup>11</sup> G.S. § 114-2.

<p><b>Criminal Justice Education and Training Standards Commission<sup>12</sup></b></p>	<p><b>Powers include:</b></p> <ul style="list-style-type: none"> <li>• Establish minimum educational and training standards that must be met in order to qualify for entry level employment and retention as a criminal justice officer in temporary or probationary status or in a permanent position; certify and recertify, suspend, revoke, or deny, pursuant to these standards</li> <li>• Establish minimum standards for the certification of criminal justice training schools and programs or courses of instruction; certify and recertify, suspend, revoke, or deny, pursuant to these standards</li> <li>• Establish minimum standards and levels of education and experience for all criminal justice instructors and school directors who participate in programs or courses of instruction; certify and recertify, suspend, revoke, or deny, pursuant to these standards</li> <li>• Investigate and make such evaluations as may be necessary to determine if criminal justice agencies, schools, and individuals are complying with the provisions of this Chapter</li> <li>• Establish minimum standards and levels of training for certification and periodic recertification of operators of and instructors for training programs in radio microwave, laser, and other electronic speed-measuring instruments; certify and recertify, suspend, revoke, or deny, pursuant to these standards</li> <li>• In conjunction with the Secretary of Public Safety, approve use of specific models and types of radio microwave, laser, and other speed-measuring instruments and establish the procedures for operation of each approved instrument and standards for calibration and testing for accuracy of each approved instrument.</li> <li>• Establish minimum standards and levels of training for certification of instructors for the domestic violence training</li> <li>• Establish standards and guidelines for the annual firearms certification of qualified retired law enforcement officers</li> </ul>
<p><b>Justice Academy<sup>13</sup></b></p>	<ul style="list-style-type: none"> <li>• Provide training programs for criminal justice personnel</li> <li>• Provide technical assistance upon request to criminal justice agencies to aid them in the discharge of their responsibilities</li> <li>• Develop, publish, and distribute educational and training materials</li> </ul>

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<sup>12</sup> G.S. § 17C-6

<sup>13</sup> G.S. § 17D-2

**Sheriffs'  
Education  
and Training  
Standards  
Commission<sup>14</sup>**

**Powers and duties include:**

- Establish minimum educational and training standards that may be met in order to qualify for entry level employment as an officer in temporary or probationary status or in a permanent position; certify, pursuant to these standards
- Establish minimum standards for the certification of training schools and programs or courses of instruction; certify, pursuant to these standards
- Establish standards and levels of education or equivalent experience for teachers who participate in programs or courses of instruction; certify, pursuant to the standards
- Investigate and make such evaluations as may be necessary to determine if agencies are complying with the provision of this Chapter
- Establish minimum standards for in-service training for justice officers
- Establish minimum standards and levels of training for certification of instructors for the domestic violence training

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<sup>14</sup> G.S. § 17E-4