Mapping Existing Retention Schedules to a Machine-Readable Format for Ingesting into ERM System
Agenda

1. Company overview.
2. Objectives and challenges of electronic records management (ERM).
3. Records retention and disposition schedules.
4. Mapping retention schedules to help automate ERM in systems.
5. Example of an implementation in M365.
6. Questions and Contact info.
1. Company Profile

• Provide information governance (IG) and records management (RM) services and solutions.

• Started out managing information for nuclear power plants.

• Over 30 years of experience with hundreds of federal, state, local, and commercial customers.

• Subject matter experts in M365 and electronic records management.

• RM/IT hybrid consultants certified in both M365 and RM.

• Current federal customers using RDS mapping in Microsoft M365/O365 include DOE, DOD DISA, USPTO, USMS, and BLS.
2. Objectives and challenges of ERM

• Implement the records retention and disposition schedule for electronic records found in a system, application, or online service.

• Most systems have some form of security, retention, and deletion capability.

• Retention is often simple and chronological based on pre-captured dates, such as created or last modified, e.g., delete 7 years after creation.

• Many retention and disposition schedules were developed for physical records and physical storage constraints.
2. Objectives and challenges of ERM

• Human habits around e-records are to create a document then move on, create another document, and move on, etc., people tend not to go back to records after they are finished with them.

• E-records don’t stack up in an office or file room where they are easily visible, electronic storage appears limitless.

• Electronic storage is perceived as cheap which gives people an excuse not to worry about disposing of data.

• Retention and disposition schedules don’t map well to ERM.
3. Records retention and disposition schedules

Schedule Overview

• Record type – described by a hierarchy or taxonomy of classifications (e.g., **GRS 1.1 - Financial Management & Reporting -> Admin records**).

• Retention rule – how long records need to be kept, temporary or permanent.

• Disposition instructions – how records get filed, disposed, destroyed or transferred to permanent archives.

Example: GENERAL RECORDS SCHEDULE 1.1: Financial Management and Reporting Records

<table>
<thead>
<tr>
<th>Item</th>
<th>Records Description</th>
<th>Disposition Instruction</th>
<th>Disposition Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>Financial management and reporting administrative records. Records related to managing financial activities and reporting. Records include: • correspondence • subject files • feeder reports • workload management and assignment records</td>
<td>Temporary. Destroy when 3 years old, but longer retention is authorized if needed for business use.</td>
<td>DAA-GRS-2016-0013-0001</td>
</tr>
</tbody>
</table>
4. Mapping retention schedules

Approach:

• Simplify disposition instructions to be unambiguous and implementable for e-records by making educated assumptions on the intent of the rule.
• Provide a human readable nomenclature for future users.
• Minimize the number of retention and disposition rules by making them generic to reduce maintenance and overhead.
• Simplify event-based retentions to allow users to provide input from the client.
• Get RM policy sign-off on the mapping.
4. Mapping retention schedules

Example 1: GENERAL RECORDS SCHEDULE
1.1:001 Financial Management and Reporting Records.

<table>
<thead>
<tr>
<th>Item</th>
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</tr>
</tbody>
</table>

Mapping

- **Rule**: Temporary with a period of 3 years, no date is specified but a condition is authorized if needed for business.
- **Assumption**: If the record is actively being used, then a longer retention is authorized.
- **Solution**: Drive the period off last modified date. If needed for reference, then make a new record copy under a different schedule.
- **Naming convention**: `Temporary_delete_3_years_modified` tells the admin it is a temporary rule that has a disposition of delete and is to be retained for 3 years after last modified date.
4. Mapping retention schedules

Example 2: GENERAL RECORDS SCHEDULE
1.1:020 Records supporting compilation of agency financial statements and related audit.

<table>
<thead>
<tr>
<th>Item</th>
<th>Records Description</th>
<th>Disposition Instruction</th>
<th>Disposition Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>020</td>
<td>Records supporting compilation of agency financial statements and related audit, and all records of all other reports. Includes records such as: schedules and reconciliations prepared to support financial statements, documentation of decisions re accounting treatments and issue resolutions.</td>
<td>Temporary. Destroy 2 years after completion of audit or closure of financial statement/accounting treatment/issue, but longer retention is authorized if required for business use.</td>
<td>DAA-GRS-2013-0003-0011</td>
</tr>
</tbody>
</table>

Mapping

- **Rule**: Temporary with a period of 2 years, after an event (audit or closure), but a condition is authorized if needed for business.

- **Assumptions**: If the record is actively being used, then a longer retention is authorized. The business user knows when the event occurs.

- **Solution**: Drive the period from when event occurs (e.g., *user marks record as final or case a closed*). If needed longer for business the user will not be completing the audit or closing the statement. If needed for reference, then it is a new record.

- **Naming convention**: *Temporary_delete_2_years_event* tells the admin it is temporary rule that has a disposition of delete and is to be retained for 2 years after user indicates the event has occurred.
4. Mapping retention schedules

Example 3: GENERAL RECORDS SCHEDULE
3.1:050 General Technology Management Records

<table>
<thead>
<tr>
<th>Item</th>
<th>Records Description</th>
<th>Disposition Instruction</th>
<th>Disposition Authority</th>
</tr>
</thead>
</table>
| 050  | Data administration records.  
Data Administration includes maintenance of data standards, corporate data models, registries, and data definitions and dictionaries. Records relate to administrative support for the maintenance of data standards, data definitions and data dictionaries... | Documentation necessary for preservation of permanent electronic records.  
Data administration records and documentation relating to electronic records scheduled as permanent in the GRS or in a NARA-approved agency schedule must be transferred to the National Archives | Permanent.  
Transfer to the National Archives with the permanent electronic records to which the documentation relates. |

Mapping

- **Rule:** Permanent with no period, no date is specified, implies some event related to sending other permanent record to NARA.

- **Assumption:** These are related to an event of sending other permanent e-records to NARA. The user of this schedule will know when the event occurs.

- **Solution:** Drive the period from when event occurs with no period.

- **Naming convention:**  
  *Permanent_transfer_0_years_event* tells the user it is permanent and has a disposition of transfer to Archives immediately after the event occurs.
## 5. Example of an implementation in M365.

<table>
<thead>
<tr>
<th>Disp. Instruction patterns found in the RDS and GRS.</th>
<th>M365 Compliance Label Names</th>
<th>Retain for this long</th>
<th>Query Criteria</th>
<th>Circumstances</th>
</tr>
</thead>
<tbody>
<tr>
<td>Temporary. Destroy X years / months / days after event. Or Permanent. Transfer to NARA x years / months / days after event.</td>
<td>Temporary_delete_x_years_event</td>
<td>x years or months or days from when label applied.</td>
<td>Individual documents: RDS = “RDS or GRS Code” AND (Lifecycle State = “Final”) AND (Project Status = “NA”)</td>
<td>Event-based dispositions tend to be for case files and not individual records.</td>
</tr>
<tr>
<td>Or Permanent. Transfer to NARA x years / months / days after event.</td>
<td>Temporary_delete_x_years_event_CY</td>
<td></td>
<td>Projects (case files): RDS = “RDS or GRS Code” AND (Project Status = “Closed”)</td>
<td>Exceptions: Individual records that get marked “Final” prior to a dependent event will show up in a disposition review. Alternatively, an explicit label can be used to apply a final retention label for the event that supersedes the auto-applied retention label.</td>
</tr>
<tr>
<td>May include:</td>
<td>Temporary_delete_x_years_event_FY</td>
<td></td>
<td></td>
<td>Optional lifecycle state and project status of “When no longer needed” can be used for certain schedules.</td>
</tr>
<tr>
<td>“and/or event 2 or event 3 or etc.”,</td>
<td>Permanent_transfer_x_years_event</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“and/or Y1 years after event E1, whichever is later” (in this case take the longer period X or Y1),</td>
<td>Permanent_transfer_x_years_event_CY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“and/or Y2 years after event E2, whichever is sooner” (in this case take the shorter period X or Y2),</td>
<td>Permanent_transfer_x_years_event_FY</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>“but longer retention is authorized if needed for business use.”. (the disposition review meets this condition).</td>
<td>Years can be replaced with months or days as needed.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Events may include but are not limited to:</td>
<td>The label included in the disposition review will indicate it requires an event to occur prior to final disposition approval.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Cutoff</td>
<td>If cutoff periodically then add the post fix to the label name for the appropriate period as follows:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Closed</td>
<td>• “_CY” – cutoff calendar year.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Obsolete</td>
<td>• “_FY” – cutoff fiscal year.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• No longer needed.</td>
<td>• The cutoff postfixes prompt the admin to only include these labels in the disposition review starting after the cutoff period.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Final</td>
<td>• Auto-apply policy name rule use prefix Auto_ : Auto_Temporary_delete_x_years_event</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Expired</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>May include cutoff periodically where period is annual or fiscal year or monthly or quarterly or semi-annually.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## 5. Example of an implementation in M365.

Entire GRS mapped to M365 term store, retention label and auto-apply policy

<table>
<thead>
<tr>
<th>GRS ID</th>
<th>Record Title</th>
<th>Disposition</th>
<th>Disposition Instruction</th>
<th>Is longer retention authorities</th>
<th>Is GRS deviation allowed</th>
<th>Disposition Authority</th>
<th>Retention Label Name</th>
<th>Assumptions</th>
<th>Farm Store Term</th>
<th>Auto-Apply Search Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRS 1.1.001</td>
<td>Financial management and reporting administrative records</td>
<td>Temporary</td>
<td>Destroy when 3 years old</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2016-0013-0001</td>
<td>Temporary_delete_3_years_modified</td>
<td>Records are made Final but may still be active based on last modified date. Created date does not account for draft periods, so last modified should be used.</td>
<td>Financial management and reporting administrative records (GRS 1.1.001)</td>
<td>GRS 1.1.001</td>
</tr>
<tr>
<td>GRS 1.1.010</td>
<td>Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting - Official record held in the office of record</td>
<td>Temporary</td>
<td>Destroy 6 years after final payment or cancellation</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0001</td>
<td>Temporary_delete_6_years_event</td>
<td>These are mainly case files after it’s closed but can be individual after made final.</td>
<td>Financial transaction records related to procuring goods and services (GRS 1.1.010)</td>
<td>GRS 1.1.010</td>
</tr>
<tr>
<td>GRS 1.1.011</td>
<td>Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting - All other copies (Copies used for administrative or reference purposes)</td>
<td>Temporary</td>
<td>Destroy when business use ceases</td>
<td>N/A</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0002</td>
<td>Temporary_delete_1_years_modified</td>
<td>When no longer needed to be itself if it relinquishes control to the business to decide to keep it or not. In this case we don’t need to apply a retention label, just marking with RDS metadata is enough.</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>GRS 1.1.012</td>
<td>Bills and proposals neither solicited nor accepted</td>
<td>Temporary</td>
<td>Destroy when no longer required for business use</td>
<td>N/A</td>
<td>Yes</td>
<td>DAA-GRS-2016-0001-0001</td>
<td>Temporary_delete_1_years_modified</td>
<td>When no longer required for business use is by itself if it relinquishes control to the business to decide to keep it or not. In this case we don’t need to apply a retention label, just marking with RDS-metadata is enough.</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>GRS 1.1.020</td>
<td>Records supporting compilation of agency financial statements and related audit, and all records of all other reports</td>
<td>Temporary</td>
<td>Destroy 3 years after completion of audit or closure of financial statement - accounting treatment/issue</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0011</td>
<td>Temporary_delete_2_years_event</td>
<td>These are mainly case files after it’s closed but can be individual after made final.</td>
<td>Records supporting compilation of agency financial statements and related audit, and all records of all other reports (GRS 1.1.020)</td>
<td>GRS 1.1.020</td>
</tr>
<tr>
<td>GRS 1.1.030</td>
<td>Property, plant and equipment (PP&amp;E) and other asset accounting</td>
<td>Temporary</td>
<td>Destroy 2 years after asset is disposed of and/or removed from agency’s financial statement</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0004</td>
<td>Temporary_delete_2_years_event</td>
<td>These are mainly case files after it’s closed but can be individual after made final.</td>
<td>Property, plant and equipment (PP&amp;E) and other asset accounting (GRS 1.1.030)</td>
<td>GRS 1.1.030</td>
</tr>
<tr>
<td>GRS 1.1.040</td>
<td>Cost accounting for stores, inventory, and materials</td>
<td>Temporary</td>
<td>Destroy when 3 years old</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0012</td>
<td>Temporary_delete_3_years_modified</td>
<td>Records are made Final but may still be active based on last modified date. Created date does not account for draft periods, so last modified should be used.</td>
<td>Cost accounting for stores, inventory, and materials (GRS 1.1.040)</td>
<td>GRS 1.1.040</td>
</tr>
<tr>
<td>GRS 1.1.050</td>
<td>Construction contractors’ payroll files</td>
<td>Temporary</td>
<td>Destroy 3 years after completion of contract or conclusion of contract being subject to an enforcement action</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2013-0003-0003</td>
<td>Temporary_delete_3_years_modified</td>
<td>Records are made Final but may still be active based on last modified date. Created date does not account for draft periods, so last modified should be used.</td>
<td>Construction contractors’ payroll files (GRS 1.1.050)</td>
<td>GRS 1.1.050</td>
</tr>
<tr>
<td>GRS 1.1.060</td>
<td>Contract appeals case files</td>
<td>Temporary</td>
<td>Destroy 1 year after final resolution</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2016-0001-0003</td>
<td>Temporary_delete_1_years_modified</td>
<td>These are mainly case files after it’s closed but can be individual after made final.</td>
<td>Contract appeals case files (GRS 1.1.060)</td>
<td>GRS 1.1.060</td>
</tr>
<tr>
<td>GRS 1.1.070</td>
<td>Vendor and bidder information - Records of suspensions and debarments for violation of the Drug-Free Workplace Act</td>
<td>Temporary</td>
<td>Destroy 5 years after removal from approved status</td>
<td>Yes</td>
<td>Yes</td>
<td>DAA-GRS-2016-0001-0004</td>
<td>Temporary_delete_5_years_event</td>
<td>These are mainly case files after it’s closed but can be individual after made final.</td>
<td>Vendor and bidder information - Records of suspensions and debarments for violation of the Drug-Free Workplace Act (GRS 1.1.070)</td>
<td>GRS 1.1.070</td>
</tr>
</tbody>
</table>
5. Example of an implementation in M365.

Retention Rules

• Retention rules can be implemented in M365 Compliance Center as Retention Labels.

• Retention label names will follow the schedule mapping convention. In this case permanent, transfer to NARA 10 years after an event with a calendar year cutoff.

• This one rule can be associated to all schedule items that have a similar retention requirement, simplifying the solution and reducing overhead maintenance.
5. Example of an implementation in M365.

**Auto-Apply Policies**

- Auto-apply policies are used to automatically apply retention labels based on queries using the Microsoft Keyword Query Language.
- Label naming conventions can be used for auto-apply policies as well. This policy indicates it is applying the previous 10-year permanent label.
- Query template:
  - **Individual** records: RDS metadata = “RDS or GRS Code” AND (Lifecycle State = “Final”) AND (Project Status = “NA”)
  - **Projects** (case file records): RDS metadata = “RDS or GRS Code” AND (Project Status = “Closed”)
5. Example of an implementation in M365.

**Term Stores**

- Term stores are part of SharePoint Online’s managed metadata service.
- A term store is a hierarchy of terms that can be used to tag records with metadata.
- In this example we have uploaded the GRS schedule to be used for documents to inherit to identify their record type based on where they are located in SharePoint.
5. Example of an implementation in M365.

**Automated Records Schedule**

- User navigates to library and uploads a document.
- Document inherits metadata that identifies what type of record it is.
- Auto-apply policy service finds the record and automatically applies the appropriate retention label.
6. Questions and contact info.

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