



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

Item	Records Description	Disposition Instruction	Disposition Authority
001	Financial management and reporting administrative records. Records related to managing financial activities and reporting. Records include: <ul style="list-style-type: none">correspondencesubject filesfeeder reportsworkload management and assignment records	Temporary. Destroy when 3 years old, but longer retention is authorized if needed for business use.	DAA-GRS-2016-0013-0001

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 allows 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.

Item	Records Description	Disposition Instruction	Disposition Authority
001	Financial management and reporting administrative records. Records related to managing financial activities and reporting. Records include: <ul style="list-style-type: none">correspondencesubject filesfeeder reportsworkload management and assignment records	Temporary. Destroy when 3 years old, but longer retention is authorized if needed for business use.	DAA-GRS-2016-0013-0001

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.

Item	Records Description	Disposition Instruction	Disposition Authority
020	<p>Records supporting compilation of agency financial statements and related audit, and all records of all other reports.</p> <p>Includes records such as:</p> <ul style="list-style-type: none">• schedules and reconciliations prepared to support financial statements• documentation of decisions re accounting treatments and issue resolutions.• ...	<p>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.</p>	DAA-GRS-2013-0003-0011

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

Item	Records Description	Disposition Instruction	Disposition Authority
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.

Disp. Instruction patterns found in the RDS and GRS.	M365 Compliance Label Names	Retain for this long	Query Criteria	Circumstances
<p>Temporary. Destroy X years / months / days after event. Or Permanent. Transfer to NARA x years / months / days after event.</p> <p>May include:</p> <ul style="list-style-type: none"> • “and/or event 2 or event 3 or etc.”, • “and/or Y1 years after event E1, whichever is later” (in this case take the longer period X or Y1), • “and/or Y2 years after event E2, whichever is sooner” (in this case take the shorter period X or Y2), • “but longer retention is authorized if needed for business use.”. (the disposition review meets this condition). <p>Events may include but are not limited to:</p> <ul style="list-style-type: none"> • Cutoff • Closed • Obsolete • No longer needed. • Final • Expired <p>May include cutoff periodically where period is annual or fiscal year or monthly or quarterly or semi-annually.</p>	<ul style="list-style-type: none"> • Temporary_delete_x_years_event • Temporary_delete_x_years_event_CY • Temporary_delete_x_years_event_FY • Permanent_transfer_x_years_event • Permanent_transfer_x_years_event_CY • Permanent_transfer_x_years_event_FY • Years can be replaced with months or days as needed. • The label included in the disposition review will indicate it requires an event to occur prior to final disposition approval. • If cutoff periodically then add the post fix to the label name for the appropriate period as follows: <ul style="list-style-type: none"> • “_CY” – cutoff calendar year. • “_FY” – cutoff fiscal year. • The cutoff postfixes prompt the admin to only include these labels in the disposition review starting after the cutoff period. • Auto-apply policy name rule use prefix Auto_: Auto_Temporary_delete_x_years_event 	<p>x years or months or days from when label applied.</p>	<p>Individual documents: RDS = “RDS or GRS Code” AND (Lifecycle State = “Final”) AND (Project Status = “NA”)</p> <p>Projects (case files): RDS = “RDS or GRS Code” AND (Project Status = “Closed”)</p> <p>Project Status global default should be “NA”.</p>	<p>Event-based dispositions tend to be for case files and not individual records.</p> <p>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.</p> <p>Optional lifecycle state and project status of “When no longer needed” can be used for certain schedules.</p>

5. Example of an implementation in M365.

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

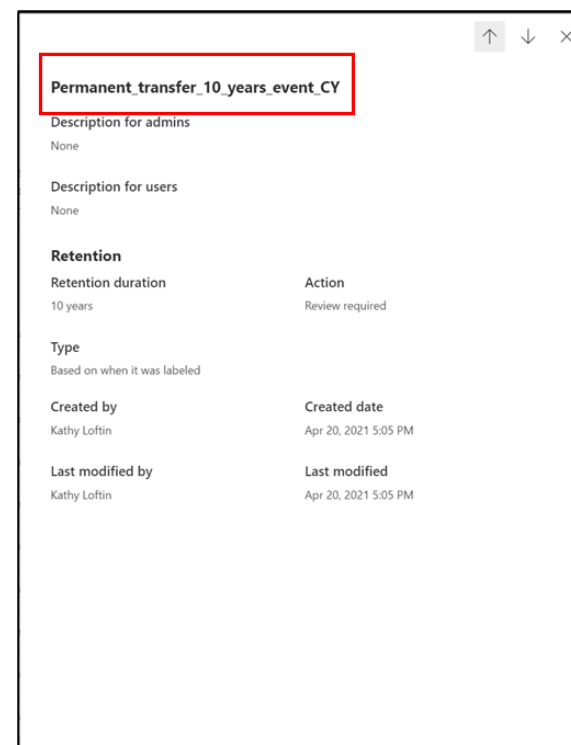
GRS ID	Record Title	Disposition	Disposition Instruction	Is longer retention authorized	Is GRS deviation allowed	Disposition Authority	Retention Label Name	Assumptions	Term Store Term	Auto-Apply Search Term
GRS 1.1.001	Financial management and reporting administrative records	Temporary	Destroy when 3 years old	Yes	Yes	DAA-GRS-2016-0013-0001	Temporary_delete_3_years_modified	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.	Financial management and reporting administrative records (GRS_1_1_001)	GRS_1_1_001
GRS 1.1.010	Financial transaction records related to procuring goods and services, paying bills, collecting debts, and accounting - Official record held in the office of record	Temporary	Destroy 6 years after final payment or cancellation	Yes	Yes	DAA-GRS-2013-0003-0001	Temporary_delete_6_years_event	These are mainly case files after it's closed but can be individual after made final.	Financial transaction records related to procuring goods and services (GRS_1_1_010)	GRS_1_1_010
GRS 1.1.011	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)	Temporary	Destroy when business use ceases	N/A	Yes	DAA-GRS-2013-0003-0002	Temporary_delete_1_years_modified	When no longer needed is by itself 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.	NA	NA
GRS 1.1.012	Bids and proposals neither solicited nor accepted	Temporary	Destroy when no longer required for business use	N/A	Yes	DAA-GRS-2016-0001-0001	Temporary_delete_1_years_modified	When no longer required for business use is by itself 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.	NA	NA
GRS 1.1.020	Records supporting compilation of agency financial statements and related audit, and all records of all other reports	Temporary	Destroy 2 years after completion of audit or closure of financial statement /accounting treatment/issue	Yes	Yes	DAA-GRS-2013-0003-0011	Temporary_delete_2_years_event	These are mainly case files after it's closed but can be individual after made final.	Records supporting compilation of agency financial statements and related audit, and all records of all other reports (GRS_1_1_020)	GRS_1_1_020
GRS 1.1.030	Property, plant and equipment (PP&E) and other asset accounting	Temporary	Destroy 2 years after asset is disposed of and/or removed from agency's financial statement	Yes	Yes	DAA-GRS-2013-0003-0004	Temporary_delete_2_years_event	These are mainly case files after it's closed but can be individual after made final.	Property, plant and equipment (PP&E) and other asset accounting (GRS_1_1_030)	GRS_1_1_030
GRS 1.1.040	Cost accounting for stores, inventory, and materials	Temporary	Destroy when 3 years old	Yes	Yes	DAA-GRS-2013-0003-0012	Temporary_delete_3_years_modified	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.	Cost accounting for stores, inventory, and materials (GRS_1_1_040)	GRS_1_1_040
GRS 1.1.050	Construction contractors' payroll files	Temporary	Destroy 3 years after completion of contract or conclusion of contract being subject to an enforcement action	Yes	Yes	DAA-GRS-2013-0003-0003	Temporary_delete_3_years_event	These are mainly case files after it's closed but can be individual after made final.	Construction contractors' payroll files (GRS_1_1_050)	GRS_1_1_050
GRS 1.1.060	Contract appeals case files	Temporary	Destroy 1 year after final resolution	Yes	Yes	DAA-GRS-2016-0001-0003	Temporary_delete_1_years_event	These are mainly case files after it's closed but can be individual after made final.	Contract appeals case files (GRS_1_1_060)	GRS_1_1_060
GRS 1.1.070	Vendor and bidder information - Records of suspensions and debarments for violation of the Drug-Free Workplace Act	Temporary	Destroy 5 years after removal from approved status	Yes	Yes	DAA-GRS-2016-0001-0004	Temporary_delete_5_years_event	These are mainly case files after it's closed but can be individual after made final.	Vendor and bidder information - Records of suspensions and debarments for violation of the Drug-Free Workplace Act (GRS_1_1_070)	GRS_1_1_070

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.

Retention Label Example



The screenshot displays the configuration for a retention label named "Permanent_transfer_10_years_event_CY". The label is highlighted with a red box. Below the name, there are fields for "Description for admins" and "Description for users", both set to "None". The "Retention" section shows a "Retention duration" of "10 years" and an "Action" of "Review required". The "Type" is "Based on when it was labeled". The "Created by" field shows "Kathy Loftin" and the "Created date" is "Apr 20, 2021 5:05 PM". The "Last modified by" field also shows "Kathy Loftin" and the "Last modified" date is "Apr 20, 2021 5:05 PM".

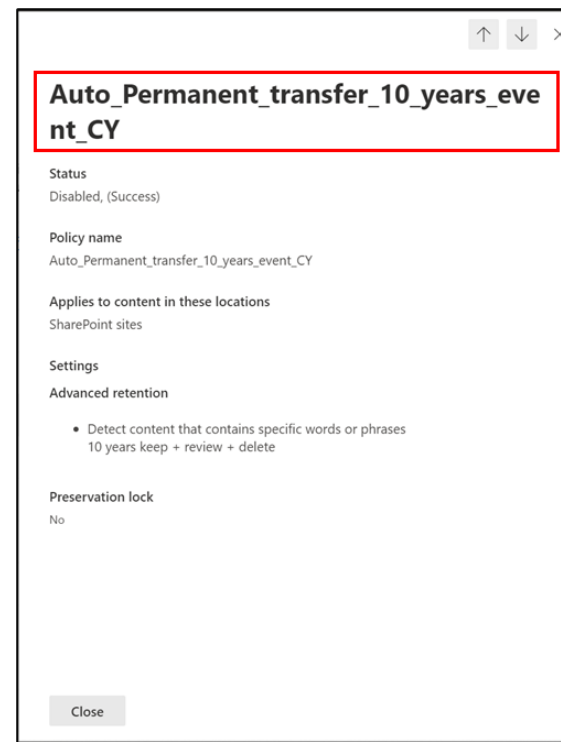
Retention	
Retention duration	Action
10 years	Review required
Type	
Based on when it was labeled	
Created by	Created date
Kathy Loftin	Apr 20, 2021 5:05 PM
Last modified by	Last modified
Kathy Loftin	Apr 20, 2021 5:05 PM

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”)

Auto-Apply Policy Example



Auto_Permanent_transfer_10_years_event_CY

Status
Disabled, (Success)

Policy name
Auto_Permanent_transfer_10_years_event_CY

Applies to content in these locations
SharePoint sites

Settings

Advanced retention

- Detect content that contains specific words or phrases
10 years keep + review + delete

Preservation lock
No

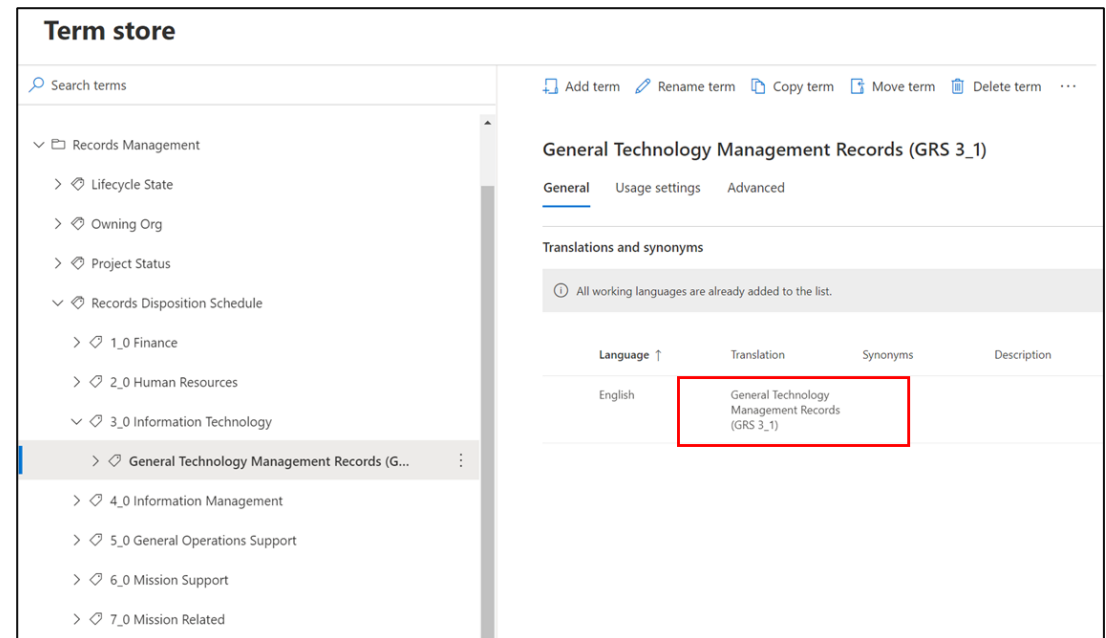
Close

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.

Term Store Containing GRS Terms



The screenshot displays the SharePoint Term Store interface. On the left, a navigation pane shows a hierarchy of term stores under 'Records Management', including 'Lifecycle State', 'Owning Org', 'Project Status', 'Records Disposition Schedule', and 'General Technology Management Records (GRS 3_1)'. The right pane shows the details for 'General Technology Management Records (GRS 3_1)', including tabs for 'General', 'Usage settings', and 'Advanced'. The 'General' tab is active, showing a table of translations and synonyms. The table has columns for 'Language', 'Translation', 'Synonyms', and 'Description'. A red box highlights the entry for 'English' with the translation 'General Technology Management Records (GRS 3_1)'.

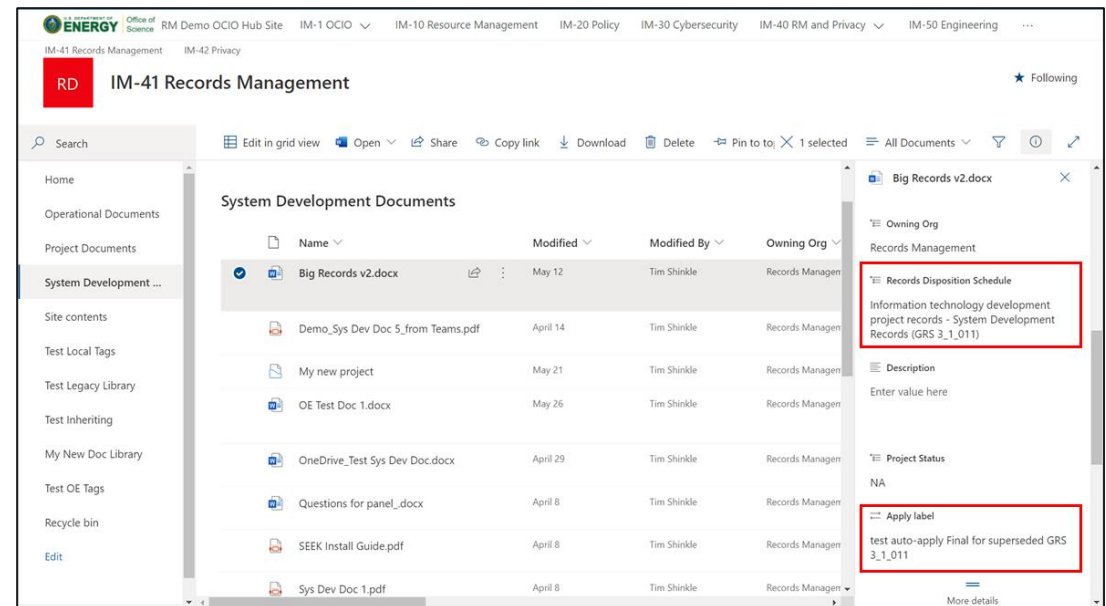
Language	Translation	Synonyms	Description
English	General Technology Management Records (GRS 3_1)		

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.

Documents inherit metadata automatically



6. Questions and contact info.

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