

Chancellor's Office Subject File

Preservation and Access Policy for Electronic Records Managed by University Archives

Draft: April 18, 2018

Background

Since 1981, the University Archives has managed non-current records from the Chancellor's Office. These files are classified as record series 24/1/1 (Chancellor's Office Subject File) and are described at archives.library.illinois.edu/archon/index.php?p=collections/controlcard&id=64. As of April 2018, the file comprised 334 cubic feet of records, covering the academic years 1967/68 to 1985/86.

Generally speaking, paper-based files were transferred to the University Archives 20 years after their date of creation, as mandated in Records Disposal Authorization 15-30 (Appendix A). However, for the past ten years, paper-based files have been retained in the central files unit, which has been retrospectively scanning files for addition to their document management system. Accordingly, no paper files have been transferred to the Archives since November 2006. Regarding the files that have been transferred to University Archives, people locate materials using folder- and item-level inventories, available through the URLs listed above. Archivists retrieve boxes from storage, and people consult materials in the Archives search room. Given the bulk of the files, their relative complexity and their storage in closed stacks, University Archives' staff members often mediated access to the record series, guiding people to materials of relevance.

This document establishes a policy and procedure framework to 1) transfer the electronic version of these files to the University Archives, 2) provide for the orderly and legal disposal of the paper-based files, and 3) establish a processing and access policy for the electronic files transferred to the University Archives. A presumption toward openness is retained, but administrative controls formalize transfer, processing, disposal, and access procedures. These controls recognize that electronic files are easier to access and distribute. They will guard against the unintentional release of any material that must be restricted for legal or policy reasons.

Guiding Principles

These policies and procedures reflect some guiding principles:

- The Illinois State Records Act and Freedom of Information Act (FOIA) presume access to public records, unless a defined FOIA exemption exists.
- Within the framework established by the Illinois State Records Act and Freedom of Information Act (FOIA), the University Archives and Chancellor's Office wish to make a good faith effort to provide access to public records.
- Materials in the record series reflect campus policy decisions. As such:
 - The record series includes some records that are exempted from release under the Illinois Freedom of Information Act.

Commented [WB1]: I was unable to locate a retention schedule for the Office of the Chancellor itself. I found several for units reporting up through the Chancellor including the Provost, Office of Affirmative Action, and Campus Honors Program, as well as for the Office of the President, but none for the Chancellor's office itself. The general schedule for [administrative records](#) (15-30) would apply, though.

- Files that have been transferred to the University Archives are removed in time by at least 20 years from their date of creation and active use.
- Preliminary drafts, deliberative works, and correspondence relating to campus-level decisions retain administrative and historical value, but the administrative sensitivities of most such records diminish significantly over time.
- Nevertheless, certain files remain exempt from release under the provisions of the Illinois Freedom of Information Act, even 20 years from the date of their creation.
- The Chancellor's Office and University Archives will make a good faith effort to segregate exempt materials from the main body of records and will implement the following policies and controls to guard against unintentional release.

Transfer, Processing, Disposal, and Access Policy

Transfer: Beginning with files from 1986-87 academic year, the Chancellor's Office Subject File will be transferred to the archives in digital (scanned or native PDF) format, using the procedures outlined below (Appendix C). In isolated cases, files with high intrinsic value may be identified by the archivist for paper preservation, but the vast majority of the records will be preserved in digital-only format.

Processing: All digital files transferred to the University Archives will be prepared for access using the procedures outlined below (Appendix D).

Disposal: Once digital files have been transferred to and processed by the Archives, paper-based files may be destroyed with the approval of the University Archives, under the authority of Records Disposal Authorization 15-30, and JCAR Rule 4400.70 (Appendix B). The procedures outlined below (Appendix E) shall be used to ensure an orderly disposal process, and the destruction of paper-based files shall require the approval of the University Archivist.

Access: Recognizing the ease of access and copying that the digital medium provides, as well as the University's legal obligation to safeguard records whose access is limited by law, digital copies of files from the Chancellor's Office Subject File will be accessible in two separate record series. Each record series will be governed by the access procedures described in Appendices F and G, and access to record series 24/1/2 shall require written approval of the Chancellor or a designated representative:

- Record Series 24/1/1: Chancellor's Office Subject File
- Record Series 24/1/2: Chancellor's Office Restricted Subject File

Policy Maintenance and Review: This policy will be maintained, reviewed, and updated at least every five years, by the staff of the University Archives and Records and Information Management Services. Review shall include consultation with the Chancellor's Office staff.

Joint Committee on Administrative Rules
ADMINISTRATIVE CODE

**TITLE 44: GOVERNMENT CONTRACTS, GRANTMAKING, PROCUREMENT AND
PROPERTY MANAGEMENT**
SUBTITLE C: GOVERNMENTAL RECORDS
CHAPTER IV: STATE RECORDS COMMISSION
PART 4400 STATE RECORDS COMMISSION
SECTION 4400.70 DIGITAL REPRODUCTION

Section 4400.70 Digital Reproduction

- a) Analog records may not be destroyed in favor of digital surrogates unless the digital surrogates are produced in compliance with this Section and unless done pursuant to a retention schedule approved by the Commission.
- b) In submitting schedules of analog records scheduled for permanent retention for which digital surrogates are to be substituted, each agency shall certify that the copies will be made in accordance with the regulations of the Commission and will be authentic copies of the analog records.
- c) Analog records scheduled for permanent retention may not be destroyed in favor of digital surrogates unless those surrogates are maintained in compliance with Section 4400.80. If the requirements of Section 4400.80 are not met, records must be additionally maintained either in original format or in a microfilm format that complies with Sections 4400.50 and 4400.60.
- d) File Integrity – The integrity and authenticity of the analog records shall be preserved through the digitization process so that the images or surrogates will be authentic copies of the analog records. They must serve the purposes for which the original records were created or maintained and the copies must contain all significant record detail needed for probable future reference.
- e) Digital surrogates of analog records must be created and stored in file formats approved by the Commission (see Appendix E). Such formats include, but are not limited to, PDF, PDF/A and TIFF.
- f) Access – The digital surrogates shall be prepared, arranged, classified and indexed to readily permit subsequent location, examination and reproduction of individual records. Hardware, software and documentation must be maintained to allow ready access to each file.
- g) External Vendors – Subject to the Illinois Procurement Code [30 ILCS 500], agencies may contract with external vendors to perform any of the tasks involved with the digitization of records. The vendors must comply with all State laws and

rules governing the digitization process. The contracting agency will remain responsible for the proper management of records in the temporary custody of the vendor.

h) Technical Standards for Creation of Digital Surrogates

- 1) Quality Control – Prior to production, an agency shall assemble a sample set of source documents or records equivalent in characteristics to the source documents for the purposes of evaluating scanner results. Scanner quality must be evaluated in accordance with current industry best practices at the time of production, such as, but not limited to, Riley & Whitsel's "Practical Quality Control Procedures for Digital Imaging Projects" and the Federal Agencies Digitization Guidelines Initiative's Technical Guidelines for Digitizing Cultural Heritage Materials: Creation of Raster Image Master Files. If agencies are uncertain as to whether they are following appropriate best practices, they should consult with the Illinois State Archives.
- 2) Quality Assurance – Before production, an agency shall develop written quality assurance procedures based upon the results of the pre-production quality sample. Before the original documents are destroyed, quality assurance must be conducted in accordance with current industry best practices at the time of production, such as, but not limited to, Riley & Whitsel's "Practical Quality Control Procedures for Digital Imaging Projects" and the Federal Agencies Digitization Guidelines Initiative's Technical Guidelines for Digitizing Cultural Heritage Materials: Creation of Raster Image Master Files. If agencies are uncertain as to whether they are following appropriate best practices, they should consult with the Illinois State Archives.
- 3) Scanning Resolution – Scanning resolution must be adequate to ensure that no information is lost. A scanning resolution with a minimum of 200 dots per inch is required for recording documents that contain no type font smaller than six point. A minimum scanning resolution of 300 dots per inch is required for engineering drawings, maps and other documents with a type font smaller than six point or with background detail. The selected scanning resolution must be validated with tests on actual source documents.

(Source: Amended at 39 Ill. Reg. 3031, effective February 11, 2015)

Appendix C: Transfer Procedure

At least once per year, staff from the Chancellor's Office will initiate a transfer of digital files from the document management system.

- Files to be transferred will include those twenty years or more from date of original creation or older.
- All files at least twenty years or older shall be transferred as soon as possible, and in chronological order by academic year (e. g. files for 1988-89 will be transferred before those from 1989-90)
- Files will be sorted into subfolders for each academic year, by date of creation.
- Files will be transferred via a hard drive, hand carried to the University Archives, or via another secure method as might be agreed by the Chancellor's Office and University Archives.

Once the files are received in the Archives, staff from the Library's Digital Preservation Unit will copy the files to a secure storage server.

While they are awaiting processing, the files will be accessible only to digital preservation and University Archives staff. Once successful transfer has been verified, the hard drive or other media will be returned to the Chancellor's Office central files unit.

Appendix D: Processing Procedure

A University Archives' Faculty member or an academic professional working under faculty direction will arrange and describe the records. The archivist will examine file folder titles to determine candidate materials for restriction. In addition, the archivist and staff members from Records and Information Management Services (RIMS) may use advanced filtering and classification tools to identify materials that bear the need for additional protection. These activities will represent a good faith effort to segregate records that are exempt from public release.

Generally speaking, records to be restricted will include the following classes of material, which reflect the exemptions allowed in the State Freedom of Information Act:

- **Private information**, such as “unique identifiers, including a person’s social security number, driver’s license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records.”
- **Personal information** that, if disclosed, would constitute a clearly unwarranted invasion of personal privacy.
- **Law enforcement records** that, if disclosed, would interfere with a pending or reasonably contemplated proceeding or that would disclose the identity of a confidential source.
- **Life and physical safety information** that, if disclosed, might endanger anyone.
- **Business trade secrets** or commercial or financial information that is proprietary, privileged or confidential and disclosure would cause competitive harm to the business.
- **Student records**, including admission and scholarship/award records.
- **Personnel records**, including evaluations, recommendation, and grievance records.
- **‘Privileged and Confidential’** records with legal counsel that are marked as such
- **Executive Session** Board of Trustee Records, where the board has not yet released the records from Executive Session.

Any such records identified for additional protection will be segregated from the main body of records. They will be placed in a separate record series, 24/1/2, “Chancellor’s Office Restricted Subject File.” Access to these files will be allowed only as described below, and after express written permission of the University Archivist and a representative of the Chancellor’s Office.

The remainder of the records (i.e. those NOT identified for protection) will be placed in University Archives record series 24/1/1, Chancellor’s Office Subject File, and will be subject to the access protocols describe below.

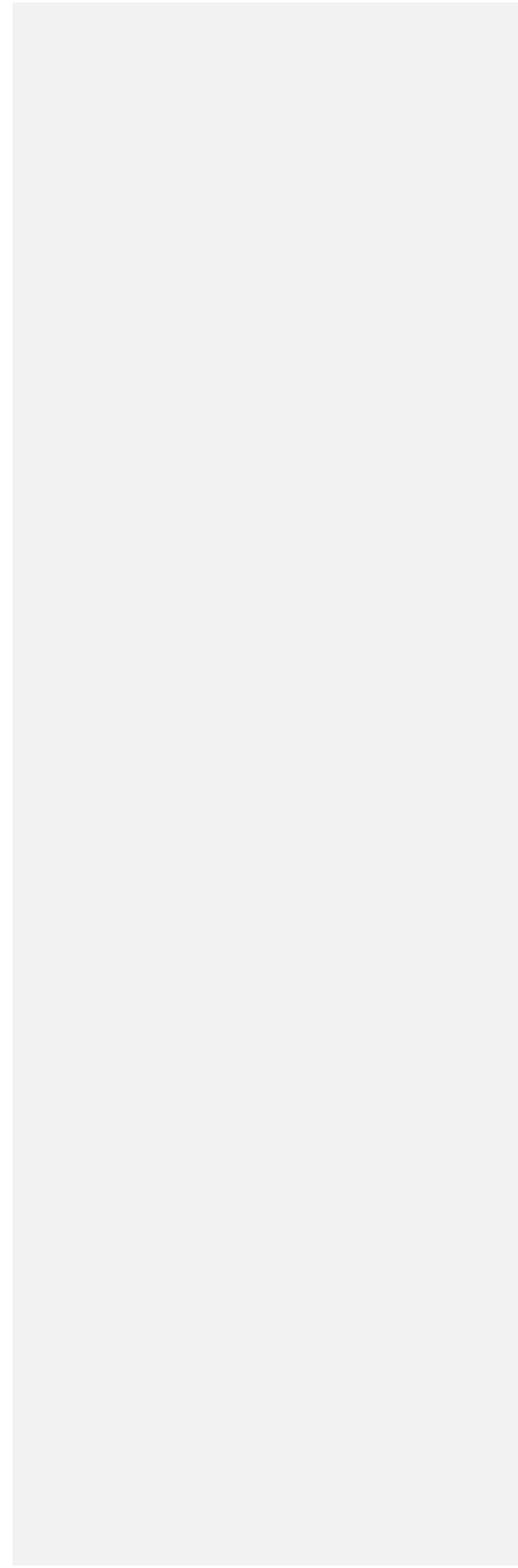
Appendix E: Disposal Procedure

Prior to disposal of the paper files that have been scanned, the Chancellor's Office central files unit will transfer the digital files to University Archives as indicated in Appendix C. In addition, central files staff will review the below scanning documentation and provide to University Archives confirmation that the documentation is still accurate or provide the updated documentation to Archives and the Records and Information Management Services (RIMS) office.

Within 30 days from the date of transfer, University Archives will begin to process the digital files to confirm that they are of sufficient quality and format to be authentic substitutes of the paper files. Within 60 days from the date of transfer, University Archives will either notify central files staff of approval to destroy the paper files or transfer the paper files to Archives custody.

In isolated cases, files with high intrinsic value may be identified by the archivist for paper preservation, but the vast majority of the records will be preserved in digital-only format.

Additional processing and identification of restricted content as indicated in Appendix D may continue beyond 60 days, but that ongoing work will not delay the disposal or transfer of the paper files.



Appendix F: Access Procedure for Record Series 24/1/1

Access to electronic materials in records series 24/1/1 will be subject to the following protocols:

- **Preservation:** Materials will be preserved in the Library's Preservation Repository (medusa.library.illinois.edu). To the extent possible, the original order of the files will be preserved, as will the original folder and file titles, except where the original order or titles provide an access impediment. In such cases, archives staff will modify order and titles to enhance access.
- **Metadata Access:** Full metadata (i.e. the file/folder title, and any additional metadata created by Archives Staff) will be available to the public, via the Library's digital library/archives: digital.library.illinois.edu. However, the files themselves will not be provided through the open web or open campus network.
- **File Access:**
 - The content of the files will be directly accessible **ONLY** in the University of Illinois search room (146 Library) on a designated computer. Copying or download of the files will not be enabled.
 - Any requests for copying of an individual file will require written approval of a University Archives staff.
 - Any requests for bulk export outside of the archives search room access (i.e. to more than a few folders of materials) will require written approval of the University Archivist and Chancellor's Office, using the following form.

Chancellor's Office Subject Files Record Series 24/1/1

Access Request Form for Electronic Records

I request access to the following records from the electronic repository of documents from the Chancellor's Office Subject File (please be as specific as possible):

Academic Year of Files	Folder Titles

I hereby agree to the following conditions of use for these materials:

1. I understand that personally identifiable information or other information legally exempt from access under the Illinois Freedom of Information Act and similar laws, regulations, and policies will be redacted or removed by the University Archives prior to release.
2. In the event that I find such information, I will not use it in a way that could be linked to a specific individual, and I will inform the Archives staff of its presence.
3. I will not provide a copy of the files to third party, publish them, post them online, or otherwise redistribute them, without prior and express written consent of the University Archivist.
4. I will destroy the copy provided to me when the files are no longer needed for research.

_____ (Requestor) _____ (Date)

Approved

_____ (University Archives) _____ (Date)

If applicable:

_____ (Chancellor's Office) _____ (Date)

Appendix G: Access Procedure for Record Series 24/1/2: Chancellor's Office Restricted Subject File

Access to electronic materials in records series 24/1/2 will be subject to the following protocols:

- **Preservation:** Materials will be preserved in the Library's Preservation Repository (medusa.library.illinois.edu), in a manner where such files are available only to archival staff and system administrators. To the extent possible, the original order of the files will be preserved, as will the original folder and file titles, except where the original order or titles provide an access impediment. In such cases, archives staff will modify order and titles to enhance access.
- **Metadata Access:** Basic metadata (i.e. the file/folder titles only) will be available to the public, via the Library's digital library/archives: digital.library.illinois.edu.
- **File Access:**
 - Users may request access using the form below. Users should be as specific as possible in submitting the request and will be required to agree fully to the conditions stated on the access request form.
 - The request will be reviewed by the University Archivist, who will then forward the request to the Chancellor's Office for review.
 - If the request is approved by Chancellor's Office, Archives will provide access to a read only copy of the files, for consultation only. No copying or redistribution will be allowed without express written permission of the Chancellor's Office.
 - All restricted content will be made publicly accessible 75 years from date of creation.

Chancellor's Office Restricted Subject File, Record Series 24/1/2

Access Request Form

I request access to the following records from the electronic repository of documents from the Chancellor's Office Restricted Subject File (please be as specific as possible):

Academic Year of Files	Folder Title

My request to consult these records is for (circle one):

Administrative use / **Course project** / **Dissertation, Book or article** / **Other**

Concerning _____

(provide as much detail as possible; attach additional sheet if necessary)

I hereby agree to the following conditions of use for these materials:

1. I understand that personally identifiable information or other information legally exempt from access under the Illinois Freedom of Information Act and similar laws, regulations, and policies will be redacted or removed by the University Archives prior to release.
2. I may be denied access to request certain types of records, in accord with provisions of the Illinois Freedom of Information Act. Such information may include the following types of information:
 - **Private information**, such as "unique identifiers, including a person's social security number, driver's license number, employee identification number, biometric identifiers, personal financial information, passwords or other access codes, medical records."
 - **Personal information** that, if disclosed, would constitute a clearly unwarranted invasion of personal privacy.
 - **Law enforcement records** that, if disclosed, would interfere with a pending or reasonably contemplated proceeding or that would disclose the identity of a confidential source.
 - **Life and physical safety information** that, if disclosed, might endanger anyone.

- **Business trade secrets** or commercial or financial information that is proprietary, privileged or confidential and disclosure would cause competitive harm to the business.
 - **Student records**, including admission and scholarship/award records.
 - **Personnel records**, including evaluations, recommendation, and grievance records.
 - **'Privileged and Confidential'** records with legal counsel that are marked as such
 - **Executive Session** Board of Trustee Records, where the board has not yet released the records from Executive Session.
3. In the event that any records exempt from distribution under the Freedom of Information Act are provided, I agree to the supplementary set of conditions noted below.
 4. For all approved requests and files, archives will provide access to a **read only** copy of the files, for consultation only, in the main archives reference room (146 Library).
 5. No copying or redistribution will be allowed without express written permission of the Chancellor's Office. I will not attempt to copy, photograph, or distribute the records.
 6. I will not release, publish, redistribute or otherwise disclose any of the types of information listed in condition 2 above. In the event that I find such information, I will not use it in a way that could be linked to a specific individual, and I will inform the Archives staff of its presence.

Supplementary Conditions:

Name (print): _____ Title: _____

Email Address _____

Signed:

_____ (Requestor) _____ (Date)

Approvals:

_____ (University Archivist) _____ (Date)

_____ (Chancellor's Office) _____ (Date)