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# Employee Guide

## Records and Information Management



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## INTRODUCTION





**Records play a vital role in the management and operations of CU\*Answers, by documenting past events and serving as the basis for future actions. CU\*Answers has a duty to our stockholders, customers and other employees to manage records effectively.**

Each day CU\*Answers employees create, receive, transmit and store volumes of information contained in email messages, computer printouts, contracts, databases, and countless other methods. The information that needs to be managed are company **records**. The information contained in these records should be properly managed so information is preserved and readily available for decision making, audits, and regulatory examinations. Records should also be disposed of at the appropriate time and in a systematic manner so they do not waste space or become a liability to the company.

This manual has been prepared for CU\*Answers. This information is designed to provide basic information about what records are, and the records management responsibilities of each employee. All CU\*Answers managers, employees, and contractors need to implement records management practices.

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# FIVE SIMPLE STEPS TO RECORD MANAGEMENT

1	?	<b>Keep records.</b> If the information needs to be kept by you or your department for legal or regulatory reasons, or as a requirement for the business, the record needs to be preserved.
2		<b>Stay on schedule.</b> Check your records retention schedule for what needs to be retained and for how long. You may need to update the schedule if the responsibilities for you and your team change.
3		<b>Have a plan.</b> Your team has a file plan on how to store records. Think about your process for storing records, and how you might label your information and storage for quick and easy retrieval.
4		<b>Keep track of time.</b> Set a little time aside to review the retention periods for your records, noting when the record life cycle ends.
5		<b>Throw it out!</b> When the retention period ends, destroy your records. In addition, don't keep non-record information for any longer than you need to (we only have so much space!).

If you follow these steps, you will not only be compliant with our policy, but finding the information you need should be easier than ever!

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## QUICK REFERENCE GUIDE

<b>Daily Tasks</b>	<p><b>Preserve records.</b> Manage records that you create and receive every day. Understand your retention schedule in order to know what to save, and where to save it. Assign clear and understandable names to all records, including file folders for paper records and titles for electronic records, so that the records can easily be retrieved from storage.</p> <p><b>Delete non-records.</b> Delete records you don't need. Examples include junk mail, personal emails, reference material, records owned by another CU*Answers team and so on.</p> <p><b>Identify records.</b> If the information relates to compliance with a corporate policy, or is evidence of an activity, decision, business transaction or process, this information is probably a record that needs to be preserved. Also, some information may need to be preserved due to a Litigation Hold.</p> <p><i>If you need to amend your retention schedule, for example if your team is assigned work on a new business plan for the company, contact Internal Audit and we will assist!</i></p>
<b>Annual Tasks</b>	<p><b>Purge expired records.</b> Records that have exceeded the retention date need to be purged.</p> <p><b>Review retention schedule.</b> Consider whether records need to be added or removed, and whether the retention period is appropriate.</p>
<b>Identifying Records</b>	<p><b>Value to the company.</b> Records will have one or more of the following values: <i>administrative value</i>, by helping an employee perform job duties; <i>fiscal value</i> by documenting the financial transactions of the company; <i>legal value</i>, by demonstrating company compliance with regulations; and <i>historical value</i>, by documenting the day-to-day operations of the company.</p>

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# WHAT IS A RECORD?

All information you create, send, and receive in the course of carrying out your job is potentially a record. If the information is a record owned by your team, you'll need to retain this information, according to established CU\*Answers' retention schedules.

Records serve as the memory of the business. Records document both the information needed for complying with regulations and the logging transactions of an organization.

Information that is a record will have one or more of these four values to the organization:

**Administrative Value:** Helps employees perform job duties.

**Fiscal Value:** Used to document the use of company funds and other financial transactions.

**Legal Value:** Provide evidence of company compliance.

**Historical Value:** Documents the company's day-to-day operations.

**What matters in determining the record is not the *form* of the information. Records could be spreadsheets, word processor documents, emails, and many other forms. Instead, what matters is the *content* of the information. If the information has one or more of the values listed above, the information may very well be a record that needs to be retained.**

## EXAMPLES OF RECORDS

Record	Value
Employee Handbook	Administrative
Team Procedure Guidelines	Administrative
Tax Returns	Fiscal
Purchase Orders	Fiscal
Vendor Contracts	Legal
Meeting Minutes	Historical
Business Deliverables	Historical

## WHAT IS A NON-RECORD?

**Non-records** are materials not considered to fall within the definition of an official record. Copies, duplicates or publications that are kept for purposes of personal reference or convenience are examples of non-records. For most teams, the vast majority of your work will be non-record. In other cases, the finished work product is the record, not the parts used to create the work product. For example, a screenshot that is used for an employee manual is not a record; the employee manual is the record (see **transitory records**, below).

**Non-records are not required to be retained and therefore do not appear on any records retention schedule, and may be destroyed without authorization.**

Other examples of non-records:

- Personal correspondence
- Junk mail/spam
- Notes or recordings that have been transcribed
- Evening weather and traffic reports

## WHAT IF YOU ARE NOT SURE IF THE INFORMATION IS A RECORD?

Ask yourself the following questions:

- Does this information have special value?
- Does this information show fulfillment of a job function?
- Will any one else need this information in the future to perform their job duties?
- Is this information evidence of a corporate decision?
- Will this information be needed as part of a financial or regulatory audit?

For additional guidance contact the Internal Audit team.

# RECORDKEEPING PRINCIPLES

Records have a **life-cycle**. A record's life extends from the record's creation, to its preservation, and finally its disposal or permanent archiving. We manage our records using a **records retention schedule**, or **RRS**, and a **file plan**. Your retention schedule tells you what to keep, where and for how long. Your file plan gives detailed information about your records and how to dispose of them.

**No need to feel overwhelmed. Typically, employees are responsible for maintaining only a few different types of records on a regular basis to support their job duties. Your team's retention schedule and file plan will help you manage your records.**

The retention schedule will have practical information for retaining record information. In this example, Employee Annual Planning (EAP) records should be retained for the fiscal year plus three additional years:

Record Series Title	Description	Retention Period
Employee Records	Copies of Direct Reports' Employee Annual Planning (EAP)	FY + 3 Years

If an EAP was generated in the 2017 fiscal year, the EAP needs to be retained for the 2017 fiscal year, and for three additional years. The EAP is to be destroyed at the end of fiscal year 2020.

In addition, you will find information on where your team stores its records, how to purge records when the retention period is completed, and if there is any backup in the event that the record is accidentally destroyed.

Record Series Title	Description	Disposition	Disposition Instructions	Backup	Storage
Employee Records	Copies of Direct Reports' Employee Annual Planning (EAP)	Destroy	Electronic: Delete File	ORD Team	Private Folder on Shared Drive (X:\Team\Private\Team Folder\Team EAPs)



Your team will find it easier if you designate a filing system for each record, establish business rules for the use of the filing system (such as document naming conventions), and review whether the team is using the designated filing system accurately and consistently.

**Retention periods** are established for records according to departmental, fiscal, contractual and regulatory requirements. Each record listed on a records retention schedule specifies a period of time the record is retained. This retention applies whether the record is on paper or electronic media. Once records have reached their designated time for destruction they should be purged from all storage, such as file cabinets for paper documents or deletion from network drives or other electronic storage.

**Internal Audit will work with your team to help establish the retention period for your records. Authorization forms for destroying expired records can be found on the Portal or by request from the Internal Audit team.**

**Transitory records** are records which are either required for a limited time to complete a routine action, are used in the preparation of final records, or are retained as convenience copies. **Transitory records will not be on your retention schedule.** They are “pieces” of the puzzle, but the completed puzzle is the record.

**The general rule of thumb is to retain transitory records only while there is an operational need and to ensure transitory records are destroyed before the end of the retention period which applies to the primary record.**

The following are examples of transitory records:

- Working documents, such as drafts or preliminary versions, and supporting materials used in the preparation of final documents, such as reports, contracts, policies and procedures, letters and memos.
- Committee agendas and minutes held by units on a distribution list or by committee members other than the committee chair/secretary.

- Copies of records retained when the original is sent to another unit, (e.g., an invoice copy where the original invoice is sent to Accounting for payment).

**Vital records** are records identified as essential for the continuation or survival of the organization if a disaster strikes. These are records that need to be part of our disaster recovery/business continuity plan. Vital records are the information absolutely necessary to resume business in the event of a catastrophe. Vital records should be marked as such on your department retention schedule. Vital records need to be stored in such a way that they can be retrieved in the event the company declares a disaster.

## **MODIFICATIONS TO RECORDS RETENTION SCHEDULES**

At minimum, teams should review their schedules annually for updates, or update the schedule when any of these conditions are met:

- Changes in statutory or regulatory requirements;
- Transfer of functions from one department to another;
- Changes in the function of the records;
- Changes in the way the records are used; or
- Changes in the data collected as part of the electronic recordkeeping system.

**NOTE: These changes need executive approval. Please complete a RRS change form and submit to the Internal Audit team. This form can be found in the Records Management home page on the Portal.**

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# APPENDIX A: RECORDS MANAGEMENT FOR YOUR TEAM

This section outlines the primary steps to follow to establish and maintain a records management program for your team. Following good records management practices will benefit your department in many ways by improving ease of access to information, controlling the use of physical and electronic storage, safeguarding vital information, and minimizing litigation risks.

## STEP 1: ASSIGN A RECORDS LIAISON

Each department should have an identified **records liaison** assigned to manage the department's records and to work with the Internal Audit team. The records liaison helps set up the records inventory, documenting the file plan and records retention schedule, and works with Internal Audit to ensure compliance with the RIM Policy.

## STEP 2: RECORDS INVENTORY

The **records inventory** is part of an effective records management program because it both identifies all records that are created, referenced or processed by the organization. The inventory becomes the working document for preparing the records retention schedule.

### What Are the Steps Needed to Perform an Inventory?

1. **Planning.** An **inventory form** will be provided to each team. This will include a questionnaire that will identify the primary and secondary functions of the department, the various types of records created/maintained, as well as their use and value.
2. **Initial assessment.** The following questions will help identify what information should be retained:
  - (a) What are the primary and secondary functions of your department?
  - (b) What are the various types of records, created and maintained by your department? Do they have administrative, fiscal, legal, or historical value?
  - (c) What department information is required to be retained by law?

- (d) What department information is required to be retained for regulatory agencies?
  - (e) What department information is required to be retained for audits or company policy?
  - (f) Is the department responsible for ensuring warranties and other obligations are met on behalf of clients and vendors?
  - (g) What information is vital and important to the operation of your department?
  - (h) What areas of your department would be at risk if certain information could not be produced?
3. **Physical inspection.** Based on the assessment, records should be identified and documented as follows:
- (a) *What is the description of the records to be preserved?* Used to identify records to be preserved.
  - (b) *What is the purpose of the records?* Used to document why the records require retention.
  - (c) *What is the record format?* Describes format of the records, such as PDF.
  - (d) *Where are the records stored and/or where should this record be stored?* This information should be specific, e.g. not just “network drive” but the folder on the network where the information is stored.

Both electronic documents and physical records (e.g. paper, CDs) should be reviewed.

### **STEP 3: ESTABLISH YOUR RECORDKEEPING PROCEDURES**

Once the inventory is complete and records identified, Internal Audit will assist with determining where and how the information will be preserved. This will involve questions related to the security of the information (who is allowed access) and maintenance of the information.

### **STEP 4: ESTABLISH RECORD RETENTION SCHEDULES**

Records schedules provide information on how long records are to be kept in the office and what happens when they are no longer needed in the office. Internal Audit will work with your team to establish retention, and post the schedules on the Portal.

**Retention periods as stated in the schedules are mandatory.**

### **STEP 5: PREPARE A FILE PLAN**

A **file plan** is the backbone for organizing records. A file plan lists the records in your department, and describes how they are organized and maintained. A good file plan is one of the essential components of a recordkeeping system, and key to a successful records management program. Every Department has a file plan as part of the retention schedule located on the Portal.

### **STEP 6: ESTABLISH PROCEDURES FOR THE DESTRUCTION OF RECORDS**

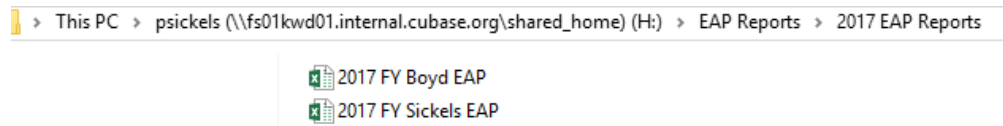
Once the file plan is documented, it is important to set procedures for record destruction. Once the retention period is completed and destruction is authorized records can be purged. Forms for destruction authorization can be found on the Portal.

Of course, non-records can be purged by the department at any time.

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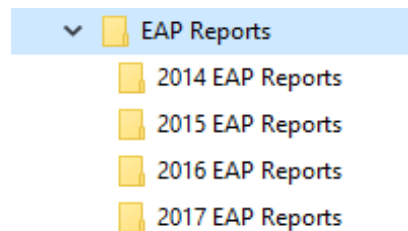
## APPENDIX B: GUIDELINES FOR ELECTRONIC RECORDS

Electronic files follow many of the same file identification and labeling guidelines as paper files. Just as paper files are located in cabinets and organized by folders, electronic records are set up the exact same way.



See **Appendix C: Guidelines for Document Naming** for additional information on how to organization electronic records.

A good strategy for organization your electronic folders is to have main folders for key department functions and sub-folders to organize those key areas, or to consider the ease of purging records once the retention period is complete.



In this case, it will be easy to purge records according to the retention schedule. Since EAP reports need to be retained for a period of the fiscal year plus three years, at the end of the fiscal year 2017, the 2014 EAP reports can be destroyed.

### EMAIL MANAGEMENT

Managing and retaining email can be challenging for employees. Emails can have information that is a record and needs to be preserved. Identifying which messages need to be kept and which can be deleted in not always easy.

**We do not recommend using the email system for managing records.**

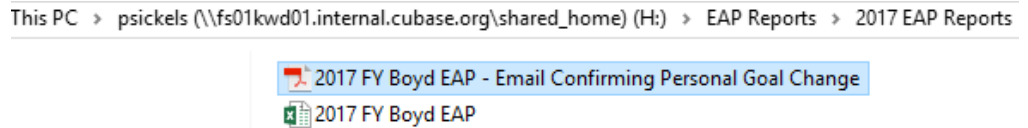
Some of the problems with using the email system include:

- Email accounts are only accessible to the user, not everyone who may need access to the information;
- Email accounts are closed when the employee leaves employment at CU\*Answers, regardless of the record's retention period;
- The email system has limited space for retention; and
- Employees that change roles within the organization may have records required by their previous team.

Having thousands of messages in your inbox and not remembering which are important is also an issue.

### Email Storage Options

If you have an email that is a record, the email should be stored along with the record series it is part of. For example:



Here are the primary methods for storing email records:

<b>Paper</b>	Email should be printed and filed in the paper filing system.
<b>Network Shared Drive</b>	Save the messages as a PDF and store on the drive.
<b>Corporate Vault</b>	File directly into the system.

### Learn How to Manage Email

For step-by-step instructions and tips on how to work with your files in Outlook, refer to these documents available on the Portal:

- How to Save an Email Message to a File
- It's Clean Up Time! Tips for Cleaning Up Your Email in Microsoft Outlook

## INSTANT MESSAGING MANAGEMENT

Instant Messages does not automatically save the dialogue as a record. Another method should be used to preserve the

information if the message is substantive enough to make the message a record.

## **SHARED DRIVE MANAGEMENT**

An efficient shared drive is one that contains only the documents and files that you need. Best practices for managing your shared drive include:

- Arrange files in a logical order as soon as possible after records are created or received. See **Appendix C: Guidelines for Document Naming** for additional assistance.
- Put all files in a folder rather than having files “loose” outside folders.
- Create a “trash” folder where unnecessary documents can be moved and deleted on a regular basis.

**If other teams need information in your “Public” folder, work with these teams on a folder structure that makes the information easy to find.**

## **DRAFT COPIES AND BACKUPS**

Draft versions of records are generally not retained and should not be retained longer than the finalized version that becomes the record.

Electronic records retained in a backup system follow the same retention as similar paper records listed on a retention schedule. If backed up to a media, such as a CD, that CD should normally be stored in a different location than the computer equipment that is used to create them.



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# APPENDIX C: GUIDELINES FOR DOCUMENT NAMING

## Document Naming Conventions

Naming conventions are standard rules applied to electronic documents and folders. Naming documents consistently, logically, and in a predictable way distinguishes them from one another at a glance and facilitates their storage and retrieval.

Some best practices include:

- Include a leading zero for numbers 0-9. Although some systems will recognize the order without the leading zero, other systems will not be able to maintain the numeric order in the file directory.

For example:

**OfficeProceduresv01**  
**OfficeProceduresv02**  
**OfficeProceduresv03**

Rather than:

**OfficeProceduresv1**  
**OfficeProceduresv10**  
**OfficeProceduresv2**

- Ensure the document name accurately describes the content of the document.

**CUAMidYearBudget2016**

- Use the preferred method of capital letters to differentiate between words. When converting, or migrating files, spaces in filenames create extra characters. Avoiding spaces will help keep filenames shorter.

**2016OfficeProcedures**

- Date the document in a “year-month-day” format (4-digit year, 2-digit month, 2-digit day) to maintain chronological order.

For example:

**2016-03-04 Agenda**  
**2016-03-24 Attachment**  
**2016-03-24 Minutes**  
**2017-02-01 Agenda**  
**2017-02-01 Minutes**

Rather than:

**1 Feb 2017 Agenda**  
**24 March 2016 Agenda**  
**24 March 2016 Minutes**  
**February 1, 2017 Minutes**  
**March 24, 2016 Attachment**

If records are retrieved according to date, that element should appear first.

**2016-03-04 Agenda**

If records are retrieved according to description, use the element first. (appropriated for events that are infrequent)

**AnnualMtg2014-12-20**

- File names of records relating to recurring events (e.g., meeting minutes, regular periodic reports, budget planning documents) should include both the date and the event.
- Avoid descriptive terms regarding format or version (e.g. DRAFT, FINAL, and MEMO) at the start of file names.

For example:

**Advertising DRAFT**  
**Advertising FINAL**  
**Budget Report 2015-2016 FINAL**  
**Budget Report 2015-2016 DRAFT**  
**Grant, S MEMO**  
**Thomas, A. MEMO**

Rather than:

**Draft Advertising**  
**Draft Budget Report 2015-2016**  
**Final Advertising**  
**Final Budget Report 2015-2016**  
**Memo A. Thomas**  
**Memo S. Grant**

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## **APPENDIX D: GUIDELINES FOR PAPER RECORDS**

For paper files, identification and labeling allows an office to maintain physical control over current files as well as manage growth of new files. Labeling serves as a visual aid by identifying individual record series and by identifying folders within each series. Paper files need to be consistently labelled and logically organized.

### **MAINTAINING PAPER RECORDS**

Some best practices around paper records include:

- Use printed labels to ensure labels are easily recognizable to everyone in the office who may need to access the files.
- File daily, with the latest record on top or in the front.
- File in order of the date on which the document was written, not the date of receipt.
- Use color-coded file tabs. People tend to recognize color faster than they read text, so color coded file tabs help facilitate quick retrieval of records.

Consider going electronic by using our corporate Vault to turn paper into digital images.

### **RETIRING/TRANSFERRING RECORDS TO OFFSITE STORAGE (28<sup>TH</sup> STREET LOWER LEVEL STORAGE OR MUSKEGON OFFICE)**

Physical records that are inactive or rarely accessed are good candidates for offsite storage.

- Contact Facilities Management for boxes for storage. Facilities Management can order boxes.
- Organize files in each box in logical order; make sure your files are neat and in order.
- Position files facing the front of each box.
- Leave room for growth or pulling files.
- Include a box content list in each box, either taped to the inside of lid or laying on the top of the files.

- Print two (2) labels and place one on the front and back of the box. You can get a template for the box label on the RIM portal page under the Forms tab; labels are located in the media center.
- Prepare “Certificate of Disposition” form. The form can be found in the Records Management home page on the portal under the forms tab.
- Have your Records Retention Liaison contact the Internal Audit team regarding disposition of unusual or odd sized material.
- Contact Facilities Management for pick-up. Boxes are picked up and stored either at the Off-Site Storage Center in Muskegon, MI or in the lower level storage room at the 28<sup>th</sup> St. Office.

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# APPENDIX E: GUIDELINES FOR IMAGED RECORDS IN THE CORPORATE VAULT

## **What records should be moved to the Corporate Vault?**

Records that will not be modified are candidates for the Corporate Vault. The Vault turns documents to images and protects them from further modification. In addition, the Vault is backed up regularly.

## **What records should not be moved to the Corporate Vault?**

If you need to *search by context* in order to retrieve documents, do not move records to Corporate Vault. In other words, you cannot search for documents in the Corporate Vault by the content inside the document; you have to search by name or other index you've created for the record.

In addition, if records are labor intensive to image and store, these might also be good candidates to be left in paper format. Of course, it may make sense to have electronic copies if the paper is taking up too much physical space.

## **How do I store records?**

Imaging Solutions utilizes an application called ProDOC. This allows you to convert documents electronically via a print-to-folder printer that ProDOC monitors. Additionally, ProDOC has the ability to scan documents, as well as create built in forms.

## **How do I set up security settings?**

A system administrator in the DocLogic Applications Suite can control users and groups as well as who has the permission to view, edit, delete documents. Imaging Solutions can help with your setup.

## **How do I protect sensitive information?**

Records are encrypted by default. Users must use the software and have permission to view the information.

## **MAINTAINING CORPORATE VAULT IMAGED RECORDS**

### **What is the best way to organize my documents?**

Documents are organized by Form Name. The Form Name at

the time of capture determines the index and destination table for saving and ultimately viewing.

### **How do I store so they are easy to retrieve?**

Defining proper *indexes* that are most important to your workflow. Information that you know you are going to search for.

### **How do I store so they are easy to destroy?**

Records can be searched by date created, so that when purging needs to be performed, documents can easily be removed from the system. If records are to be destroyed due to a triggering event, special tables can be set up by Imaging Solutions these types of retention periods.

### **How do I audit my program, or set up so it is easy to audit?**

All user actions are logged in an access log as well as a change log. This will tell you which username id what at any given moment, along with Document ID they are accessing and or deleting.

## **RETIRING/TRANSFERRING IMAGED RECORDS TO OFFSITE STORAGE**

### **How do I purge records from the corporate vault?**

CU\*Answers Image Solution is currently working out a process for Purging Documents. (This section will be updated when the process starts.)

### **What are my choices for long-term preservation?**

Records can be transferred to CD for storage. Records can be permanently stored in the corporate vault.

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## APPENDIX F: THE ROLE OF EMPLOYEES

Records created in the course of CU\*Answers business belong to CU\*Answers rather than the individuals that create or use them. However, all staff and other providers of CU\*Answers services have defined and shared responsibilities for managing records.

This section addresses the roles and responsibilities that each key stakeholder has to own to implement the records management Program in their areas.

<b><i>The CFO</i></b>	The CFO plays an active role in sponsoring the program, communicating their support and delivers key communications and expectations to their direct reports and employees.
<b><i>Business Unit Managers</i></b>	<p>Each manager is responsible for administering the records management program in their department and therefore is accountable for the records they are custodians of. All records and information in their custodianship should be in compliance with the record retention schedule.</p> <p>Managers are also responsible to assign a records liaison and to provide appropriate time for the liaison to dedicate to recordkeeping activities.</p>
<b><i>Records Liaison</i></b>	The records liaison helps set up the records inventory, documenting the file plan and records retention schedule, and works with Internal Audit to ensure compliance with the RIM Policy.
<b><i>Employees</i></b>	All employees/contractors have a role and are responsible and accountable for the records in his or her possession.

***Organization  
Resource  
Development  
(ORD)***

ORD coordinates with Internal Audit on training development activities.

***Network  
Services and  
Imaging  
Solutions***

The Internal Audit Team is collaborating with these teams to give focus and direction in terms of the record management strategy and associated systems.



## APPENDIX G: GLOSSARY OF TERMS

<b>Term</b>	<b>Description</b>
<b><i>Administrative Value</i></b>	A record that helps employees perform office operations.
<b><i>Corporate Vault</i></b>	Place where electronic documents are imaged and stored for CU*Answers. This system is managed by the Imaging Solutions Team.
<b><i>Fiscal Value</i></b>	Records with fiscal value are those that fulfill and document financial authorizations, obligations, and transactions.
<b><i>Historical Value</i></b>	Documents the organization's operations and major shifts of direction over the years.
<b><i>Index</i></b>	Information used to search and retrieve electronic documents.
<b><i>Legal Value</i></b>	Provide evidence of legal or regulatory compliance.
<b><i>Record</i></b>	Records are information that is retained if it meets certain requirements.
<b><i>Record (Active)</i></b>	Records which are in current use and need to be accessed frequently or on a regular basis.
<b><i>Record Copy</i></b>	The official copy of a record that is retained for legal, operation, or historical purposes.
<b><i>Record Disposition</i></b>	The final destination of records after they have reached the end of their retention period.
<b><i>Record (Inactive)</i></b>	Records which are needed infrequently or never for operational use but which must be retained for a certain length of time to meet statutory, fiscal, or other requirements.
<b><i>Record (Historical)</i></b>	Records that need to be kept because they have historical value of the company and are preserved for memory.
<b><i>Records Life Cycle</i></b>	Records life-cycle refers to the following stages of a record's "life." A record's life extends from the record's creation, to its preservation, and finally its disposal or permanent archiving.
<b><i>Record Retention Schedule (RRS)</i></b>	A document that lists what records are in your department and how long CU*Answers intends to keep them. Every department has one.
<b><i>Record Series</i></b>	Record Series are a group of similar records that are arranged according to a filing system.

<b>Term</b>	<b>Description</b>
<b><i>Trigger Events</i></b>	A trigger event is something that must occur before a retention period begins to run. Some external event must occur before the retention period starts. For example, contracts are retained 7 years after the contract expires. The termination of a contract is the trigger event.
<b><i>Vital Record</i></b>	Records that contain information to recreate its legal and financial status and to preserve the rights, obligations of employees, customers and investors.

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# APPENDIX H: RECORDS AND INFORMATION MANAGEMENT POLICY

The purpose is to provide CU\*Answers with guidelines for properly establishing a records and information management (RIM) program, and assisting those departments that require long-term records retention and procedures for effective implementation. The goal is to provide CU\*Answers with a policy that provides compliance with our legal, regulatory, and contractual obligations.

Unless mandated by law, regulation, contractual obligations, or as a result of a litigation hold, there is no legal duty to preserve information generated in the course of business. A consistent data preservation and destruction policy is valuable in the event records cannot be produced upon a court order or regulatory demand. This included recorded phone calls, chat transcripts, emails, and other documents.

## 9.01 SCOPE AND DEFINITIONS

Records and information management (RIM) is the systematic control of all records, regardless of media, from the point of their creation or receipt, through their processing, distribution, organization, storage, and retrieval, all the way to their final disposition. Information flows through the organization in the form of paper and electronic records including but not limited to word processing documents, spreadsheets, e-mail, graphical images, and voice or data transmissions. Information can be stored on a variety of storage media, such as microfilm, microfiche, diskette, optical disk, CD-ROM, videotape, and paper.

## 9.02 PRINCIPLES

This policy details the requirements and responsibilities to initiate a well-defined RIM program. The RIM program applies to those departments that require a long-term records-retention, -storage, and -disposition program. Absent specific, written provision to the contrary, it is presumed that the RIM program applies to all departments within the CU\*Answers.

The following are the goals and principles of the CU\*Answers RIM program:

### INTERNAL RECORDS ONLY

This policy applies to CU\*Answers' records and information. Records and information managed for clients is governed by the

clients' own RIM policies and the agreements between the clients and CU\*Answers.

#### **PRESERVE ONLY RECORDS OF VALUE**

Ensure only essential records of continuing value are preserved. Records should be retained in the active office areas as long as they serve the immediate administrative, legal, or fiscal purpose for which they were created.

#### **ESTABLISH SAFEGUARDS**

Establish safeguards against the illegal removal, loss, or destruction of records. Records either should be disposed of in accordance with an approved records-retention schedule or transferred to the records-retention center until the prescribed retention period has expired.

#### **RESPONSIBILITY OF OWNER/CREATOR**

Management of records is the responsibility of the owner or creator, of the record. CU\*Answers will ensure that one or more records managers will be designated for each department to assist in the implementation of the RIM program. The department director or the director's designated representative should remain in periodic contact with the records manager to discuss initiating the records-management program or reviewing an existing records-management program to handle records properly from their creation through their destruction. Departments can be provided guidance on how records should be organized and stored to ensure timely and efficient retrieval.

### **9.03 RETENTION SCHEDULE**

The records-retention schedule is the key tool for departments to use to manage their records effectively. Information is a valuable asset; however, if records that contain information cannot be retrieved efficiently or are retained beyond their legal, regulatory, or administrative retention period, they lose their value and may impose a liability to CU\*Answers.

### **9.04 RECORDS LIAISONS**

Departmental Records Liaisons are responsible for: training staff on record retention procedures; assisting in developing and enforcing the records-retention schedule for their department; managing the department's records; attending records liaisons' meetings; assisting in the implementation of any litigation hold(s) enacted by the CU\*Answers.

### **9.06 COORDINATE CHANGES**

The CFO shall cause departmental activities to be coordinated with the Records Liaison to include approval of new or

replacement records storage and file equipment as requested.

## **9.07 MINIMUM REQUIREMENTS**

### **RECORDS-RETENTION SCHEDULES**

Each department is responsible for determining retention periods for records created. A record may be kept beyond the legal or regulatory retention period if it satisfies an administrative need based on business necessity, which is stated on the records-retention schedule.

A Records Retention schedule will have the following minimum characteristics: an inventory all current records maintained, including all media types; a master list of data and record types and draft preliminary retention schedule; retention periods will be based on legal, contractual, administrative, and historical value; final approval for retention schedule is from the Accounting Manager; the retention schedule will be audited annually.

### **RECORDS-DESTRUCTION SCHEDULES**

Each department is responsible for destroying any paper or electronic record once the specific retention period for any paper or electronic record has been reached. Notwithstanding minimum retention periods, all records shall be maintained until all required audits are completed and shall be kept beyond the listed retention period if a litigation hold is enacted (see Litigation Hold Policy).

Destruction of records is permitted in accordance with the law only after expiration of the retention periods stated on the approved departmental retention schedules.

### **RECORDS CENTER FILE TRANSFER**

Files will be accepted throughout the year once a department has coordinated set patterns for retention. The following transfer protocol will be used: files must be packed in approved storage boxes; instructions will be provided for proper packing and labeling of boxes in the records-management handbook; pickup will be coordinated with departmental Records Liaison.

### **REQUEST FOR RETRIEVING FILES OR RECORDS**

Departments wishing to retrieve records will contact the records-retention center. The departmental Records Liaison will provide information for locating the file. All requests for records shall be mailed or e-mailed to records management. Retrieved records will be tagged with a Records Center Reference Request form. This form must be returned to allow prompt and accurate re-filing.

### **ASSISTANCE IN THE SELECTION OF RECORDS FILING SYSTEM EQUIPMENT**

All new records-management and filing equipment should be

reviewed, as requested, prior to purchase to ensure they are efficient and cost-effective in storage space.

#### **COMPLIANCE AND AUDITING**

The company shall annually inventory all records in the records center to confirm information in the records-retention tracking system; the records manager will have the records-retention schedule reviewed and validated annually for accuracy; the records manager will advertise and initiate an annual files purge by all departments. The purpose is to have individuals review personal active file systems, as well as electronic document folders, and to purge documents that are no longer required.

#### **ANNUAL RECORDS DESTRUCTION PROGRAM**

The records manager will annually inventory all records that have been kept past their retention schedule. The records manager will confirm with each department that the records can be destroyed before initiating record destruction. The records manager will record all instances of electronic or physical destruction of documents as part of the audit report.

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# APPENDIX I: LITIGATION HOLD PROCEDURE

If a CU\*Answers employee learns:

- A government investigation of the Company has been commenced or is reasonably anticipated; or
- Litigation involving CU\*Answers has been filed or is reasonably anticipated; or
- Litigation against CU\*Answers has been filed or is reasonably anticipated; or
- CU\*Answers has been served with a subpoena or other request for information; or
- Other circumstances where the preservation of documents may be required,

The employee must report those circumstances immediately to the Company's CIO or other corporate officer. Depending on the circumstances, not all of the above situations will warrant a litigation hold. Upon receipt of such notification, the Company's CIO will investigate and then determine whether a litigation hold is appropriate.

## **CIO OWNERSHIP**

If a litigation hold is enacted, the CIO will be responsible to manage the litigation hold.

## **LITIGATION HOLD NOTICE**

If a litigation hold is appropriate, the hold notice should be issued as soon as practical by CIO. The notice should identify the data that are subject to the litigation hold and advise all employees not to delete, overwrite, or otherwise alter or destroy any records (paper or electronic) that may contain information that is reasonably related to the identified subject matter. The notice should also make clear that this obligation applies to records that currently exist or are created in the future. The litigation hold notice should include directions to all CU\*Answer employees to advise CIO if that employee has any paper or electronic records related to the litigation hold in his or her possession so that the information can be collected in a timely manner. The notice should also describe all the types of media

where records may be stored—e.g., laptops and all other portable devices, such as cell phones, PDAs, home computers, and voice mail. The notice should advise that all data, even data on back-up tapes, should not be overwritten or rotated until further notice from CIO.

### **IDENTIFICATION OF "KEY" EMPLOYEES**

The CIO should then identify employees likely to have paper or electronic records that are subject to the litigation hold ("key employees") by reviewing relevant documents and sending a follow-up e-mail to all employees. The CIO should meet with these key employees to confirm their understanding of the litigation hold and to request that they gather the paper and electronic records in one location for collection. The CIO should document these meetings.

### **COLLECTION OF APPLICABLE RECORDS**

The CIO should work with appropriate support staff to develop a plan for the systematic and orderly collection of all paper and electronic records subject to the litigation hold. A personal meeting with each key employee to confirm that all paper and electronic records have been identified and collected should be conducted and documented. Records subject to the litigation hold should be stored in a central location where they can be cataloged. All key employees should sign a document verifying that to the best of their knowledge they have identified and turned over all paper and electronic records subject to the litigation hold.

### **PRODUCTION OF APPLICABLE RECORDS**

The CIO will be responsible for coordinating any production of documents outside CU\*Answers. The CIO should update the key employees and CU\*Answers' responsible lawyer(s) as needed regarding the status of the litigation hold. The CIO should periodically remind all key employees (and any other personnel newly assigned to the applicable matters) of their continuing obligations to preserve records under the litigation hold. The CIO will be responsible for determining when a litigation hold is no longer necessary. Copies of all communications regarding the litigation hold should be sent to the CIO's assistant so that a complete file regarding the Company's efforts to comply with the litigation hold is maintained. Any questions regarding this policy or its implementation should be directed to CIO or the Company's responsible lawyers.



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## HOW TO LEARN MORE

For more information on record management topic refer to these related documents, all available on the Records and Information page of the Portal:

- Demystifying the Legal Hold
- FAQ: Email
- How to Save an Email Message to a File
- It's Cleanup Time! Tips for Cleaning Up Your Email in Microsoft Outlook
- RIM Forms