THE UNIVERSITY OF TEXAS-PAN AMERICAN
OFFICE OF AUDITS & CONSULTING SERVICES

Department of Records and Information Management
Report No. 15-08

May 19, 2015

Dr. Havidán Rodríguez, Interim President
The University of Texas-Pan American
1201 W. University Drive
Edinburg, TX 78539

Dear Dr. Rodríguez,

As part of our fiscal year 2015 Audit Plan, we completed a risk based audit of Records and Information Management (RIM). The objective of the audit was to determine whether physical and electronic records are managed according to statutes and University of Texas System policies. The scope of the audit consisted of a review of current procedures.

We performed audit procedures that included interviews with staff; gained an understanding of the processes performed by RIM and applicable state statutes and University policies; conducted interviews with University records coordinators; tested the RIM department to verify records stored were in accordance with the University records and information management and retention policy; interviewed University departments to verify that records stored were in accordance with the University's records and information management and retention policy.

Overall, we concluded that the Department of Records and Information Management's physical records are managed according to statutes and University of Texas System policies. We identified areas where improvements to internal controls are necessary and management has agreed to take corrective action. The detailed report is attached for your review.

We appreciate the courtesy and cooperation received from management and staff during our audit.

Sincerely,

Eloy R. Alaniz, Jr., CPA, CIA, CISA
Chief Audit Executive

The University of Texas – Pan American
Department of Records and Information Management
Risk Based Audit

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EXECUTIVE SUMMARY

The University of Texas – Pan American (UTPA) generates, collects and stores volumes of official records, which includes paper, microform, electronic, including all electronically stored information or any other media. Managing this information is a critical process for the University to ensure that records are protected from unauthorized disclosure and misuse. All official records are subject to retention periods approved by the Texas State Library and Archives Commission. The institutional Records Retention Schedule (RRS) provides a list of official records for each department on campus and prescribes the periods of authorized retention.

As per UTPA Handbook of Operating Procedures *Section 4.4.1Records and Information Management and Retention* Policy, the Institutional Records Management Officer (RMO) acts as the President's representative in all matters related to official records management policy, responsibility, and statutory compliance. The RMO oversees the Records and Information Management (RIM) department and is under the Division of Information Technology. RIM is responsible for assisting University departments manage their records and comply with the University RRS, including disposing of official records in accordance with guidelines. RIM provides the following services: hardcopy document storage, document shredding, records management training, and coordination of the department records managers' program.

The objective of the audit was to determine whether physical and electronic records are managed according to statutes and University of Texas System policies.

Overall, we concluded that physical records are managed according to statutes and University of Texas System policies. However, we found that:

- Electronic records management was inadequate.

- Training session's attendance records were not maintained.

- Based on testing, three (3) out of five (5) boxes stored in the RIM department had incorrect destruction dates and information in the inventory system.

BACKGROUND

RIM provides University departments with records management training, document shredding, and secured storage services. RIM is also tasked with ensuring that department records managers and coordinators are fulfilling their responsibilities in complying with records and information management and retention requirements. Departments with materials containing sensitive or confidential information are required to dispose of the materials in a manner that ensures that sensitive or confidential information is not disclosed. At the time of the audit, RIM stored 2,977 boxes with 1,138 of those containing permanent records. RIM currently employs three (3) full-time employees and four (4) work-study employees. The volume of shredding has increased over the past couple of years. For 2014, 85,555 lbs. of paper was shredded. For FY 2013 and 2012, the amount of paper shredded was 74,418 lbs. and 74,237 lbs., respectively.

In September 2015, UTPA will join The University of Texas Brownsville (UTB) and a new medical school to become The University of Texas Rio Grande Valley (UTRGV). UTRGV records management office will be reporting to the Director of Records Management and Open Records Officer within the Office of the Executive Vice President for Finance and Administration. UTB currently has one person leading the records management program. The combined records management programs will play an important role in the success of UTRGV.

AUDIT OBJECTIVE

The objective of the audit was to determine whether physical and electronic records are managed according to state and University of Texas System policies.

AUDIT SCOPE & METHODOLOGY

The scope of the audit consisted of a review of current procedures. To accomplish the audit objective, we performed the following:
- Gained an understanding of the processes performed by RIM.
- Gained an understanding of applicable state statutes and University policies.
- Conducted interviews with University records coordinators.
- Tested the RIM department to verify that records stored are in accordance with the University's records and information management and retention policy (HOP 4.4.1).
- Interviewed University departments to verify that records stored are in accordance with the University's records and information management and retention policy (HOP 4.4.1).

The audit was conducted in accordance with guidelines set forth in The University of Texas System's Policy 129 and *The Institute of Internal Auditor's International Standards for the Professional Practice of Internal Auditing.*

AUDIT RESULTS

Resources

At the time of the audit RIM had four (4) full-time positions and four (4) work-study employees. The Document Imaging Specialist was hired during the course of the audit. The Records Technician position was vacant, and the department was actively seeking to fill this position but it has been put on hold until further notice. Once filled, the department will be fully staffed.

RIM facilities include a large storage facility, a vault, a shredding work area, a work-study work area, staff offices, and a conference room. The equipment used by the department includes two industrial paper shredders, one cargo van, a small air filter, and an air compressor. This equipment is primarily utilized for paper records. In addition to this equipment, RIM also is in the process of implementing ImageNow, a document imaging system. The department recently hired a document imaging specialist dedicated to this task. Both the facilities and equipment were adequate for this function.

Department had enough resources available for paper records to comply with HOP 4.4.1; however, resources were focused more on paper records instead of electronic records management.

Electronic Records

The electronic records management services provided by RIM were limited to the extent of storing backup tapes for the Computer Center in the department's vault. The department did not store any electronic records for retention purposes.

In December 2014, RIM hired a document imaging specialist to lead document imaging services for the department. As previously mentioned, the records imaging system that RIM plans to use is called ImageNow and is distributed by Perceptive Software.

We evaluated electronic record management processes. To do this, we tested a sample of three (3) departments that have systems that collect and process sensitive and confidential information. All three departments had fairly new systems that did not have electronic records past their retention schedules; therefore, no processes were in place to delete records once they passed their retention schedule. In addition, all departments in our test sample did not have processes to delete records past their retention schedules for other electronic files, such as spreadsheets, emails, PDFs, etc.

Overall, we concluded that University departments did not have processes to manage electronic records in accordance with the Records Retention Schedule. We noted that the RIM team efforts are primarily on hardcopy records management rather than electronic records.

Recommendation:

1. As RIM transitions into UTRGV, focus should be placed on electronic records management. It should create, promote, and maintain electronic records management awareness through the implementation of specific electronic records training and consultations. In addition, the department should include current electronic records management information on their website.

Management Response:

1. RIM is in the process of implementing an Electronic Records training module to be placed in Blackboard and will require that all employees take the training yearly. The Records Management training provided on-demand or to newly designated Records Managers and Records Coordinators will be updated to include Electronic Records management. The department website will be updated to include information on Electronic Records management processes, procedures and a frequently asked questions section.

   Implementation Date: 9/30/2015

Training

The RIM staff, including the Records Manager, received initial training when hired as records management employees from the Texas State Library and Archives Commission on various topics including electronic records. In 2013, two of its key employees had attended an e-Records Conference. The training received was appropriate to develop a comprehensive records and information management program.

The department provided numerous one-to-one consultations to University employees requesting assistance with records management processes. The number of consultations and time spent was tracked as part of the department's yearly metrics. RIM provided 85 consultations during FY 2014. In addition, RIM is creating an online training targeting email retention and plans to make it available through the University's online training portal.

Overall, the training and consultations provided by RIM were adequate. Sufficient documentation was provided and reviewed during training sessions. However, training sessions did not include awareness or specific training on electronic records management. In addition, attendance documentation for training sessions was not maintained. Consequently, we were unable to determine whether all department records managers and records coordinators received training.

Recommendation:

2. RIM should maintain training attendance records.

Management Response:

2. A new Trainings Attendance spreadsheet will be created and maintained from the attendance sign in sheet. This spreadsheet will be used to track all attendees and the date attended. The Records Coordinator's spreadsheet will be updated and will be used to record the date the training was attended by each Records Coordinator. A semi-annual (October and April) review will be done on the Records Coordinator spreadsheet to identify any Records Coordinators that have not taken the training. Trainings will be scheduled with any identified as not having taking the training.

  Implementation Date: July 1, 2015

Hardcopy Records

We also evaluated the accuracy of information submitted by the department records coordinators and posted on the boxes kept by RIM. Box labels are created by the departments when they send boxes to storage. In addition we reviewed the retention period on the boxes selected for testing. A sample of five (5) boxes was randomly selected from three (3) departments. These departments had a total of 330 boxes stored in the RIM department.

Three boxes had incorrect destruction dates. This was caused by records management data entry errors and by incorrect dates printed in box labels.

Recommendation:

3. RIM should develop and implement processes, such as verifying box labels as they are received by departments prior to entering into the inventory system, to improve the accuracy of the information posted on box labels and recorded in the records management inventory system.

Management Response:

3. To reduce errors in manual data entry, RIM implemented a process 4 years ago where only full-time staff are allowed to data enter information from boxes collected from departments. Labels on boxes that are picked up are checked for accuracy during pickup. RIM will implement a second verification by a different person at the main office to ensure accuracy before entering the information into the records management inventory system.

  Implementation Date: September 1, 2015

Department Records Managers

Overall, the list of records managers, coordinators, and alternates provided by RIM is up-to-date and provides enough coverage for all University departments.

We selected a sample of three (3) records coordinators to determine whether they were aware of their responsibilities and were performing their records management duties. The records coordinators interviewed had received training, knew their records management's responsibilities, and maintained records management documentation.

CONCLUSION

Overall, we concluded that physical records are managed according to state and University of Texas System policies. However, there are opportunities to improve the University's records and information management and retention program. RIM should focus on electronic records management, maintain attendance records for all training sessions, and improve accuracy of its inventory system.

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Jose Gomez, MS
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