Over the next 6 minutes I’ll be summarizing an effort I participated in to create what I hope is a practical, useful records retention schedule for higher education institutions in Montana.
[Showing photographs of Montana scenery as I give background details of project – encourage folks to visit our beautiful state.] The University of Montana (UM) is a doctoral-granting university with about 13,000 FTE students. We were established in 1895 and are the flagship liberal arts university in the state. There is no systematic records management program at UM – each unit is responsible for its own records and there is no mandate to transfer records with long-term value to the archives. As the university’s archivist, I am interested in acquiring records with historical value. Collecting – or depositing – done before and since my arrival has resulted in about 2000 linear feet of university records being held at the Archives, but I suspect that as much as 1/4 of the records do not warrant retention. In addition to my own interests in deaccessioning and more systematic collecting, I frequently field queries from offices around campus about whether they need to retain a particular type of record, and for how long.
Until this project began, the Records Retention Schedule most frequently referred to by campus units was the General Records Schedule from the Montana Secretary of State’s office. While helpful in some areas, there are numerous higher-ed specific series that do not have parallels in the GRS. Although I had been communicating with our legal counsel about my interest in having a RRS for UM since my arrival in 2003, neither of us had the time (or the expertise) to focus on this. Finally, in 2011 I offered to apply for a sabbatical in order to focus on creating one. Instead, our attorney assigned two legal interns to work with me. We were asked to create a schedule that could be used across the entire Montana University System.
Montana has about 1 million people. Geographically, we are the fourth largest state in the US. The Montana University System is made up of 16 public colleges and universities across the state. (It does not include the state’s seven tribal colleges or its three private colleges.) Together the system enrolls just over 46,000 students each semester. The System is governed by a Board of Regents and overseen by the Commissioner of Higher Education. I believe there are 5 full-time attorneys working for the offices of legal counsel, including two at the University of Montana. Although within the System, including at the two universities, there are internal auditors and risk managers to the best of my knowledge there is no records manager.
I worked with the two legal interns in 2011-2012. Using the RRS of several other institutions, including the University of Wyoming, the University of Washington and the Oregon University System, we came up with a very detailed functional RRS. There were descriptions of each record series and the schedule included disposition instructions for both record creator and copy holder. In the draft we created for review by the System attorneys, we made notes about what source we’d used for certain retention recommendations (such as the Montana GRS). Just as we submitted the RRS to the UM attorney, several critical issues required his attention. He retired later that year, as did the attorney for the System. I was back almost to square one.
In the summer of 2014 I approached our new attorney about the draft RRS. She moved it forward to the MUS attorneys, and then appointed me to work with two of them to create a revised version of the Schedule. Meeting in person in Helena, we used the original draft I helped to create, the GRS from Montana, the Montana Code Annotated (2015), The Ohio State University’s RRS and the American Association of Registrars and Admissions Officers. Retention, Disposal, and Archive of Student Records (2013) and ultimately came up with a very streamlined General Records Retention Schedule for the Montana University System.
This version of a RRS for MUS has fewer series than the earlier draft, and only brief descriptions of each series. It has only one column for disposition and only a few options within that column, including Active, Current Year + x years, Destroy, and keep Until Superseded. The other two options are Permanent, meaning the creating office must ensure that the series / record gets saved, and Archival Review, which is defined in part: “Record series that have content of value to documenting the institution’s history should be considered for permanent retention. If retention is warranted, files may be maintained by office of origin or designated archival repository.” Only the two universities in the System have full-time archivists, so in many cases it would be up the creating office to evaluate the record for retention. And not every campus has a ‘designated archival repository’ – in fact, most do not.
Our RRS is not considered a policy, but is rather a Directive of the Commissioner. This means that the document is not a “you shall” but rather a “you should.” It is a guideline. This was important to the attorneys because, given the nature of staffing on the campuses, it will likely be impossible to ensure that records are transferred or destroyed according to a schedule. We wanted the schedule to be practical and helpful, not punitive.

The RRS is considered a draft through January 2017 and comments are being solicited. The UM attorney, who fields the majority of questions about retention from various departments across the UM campuses – indicates it is well-received thus far and that she has referred to it frequently. The full schedule is online via the Commissioner’s Office at

Perspectives and Lessons Learned:
- Be patient, but persistent. Obviously the creation of a RRS was something I was interested in, but could not accomplish alone. Taking time to get stakeholder buy-in, in part through establishing good relations with legal counsel around other matters, was useful to the end result.
- Be aware of the interests of stakeholders. My communication with legal counsel and with offices across campus allowed me to understand how others (beyond just the archives) would benefit from having a RRS, which I used in my ‘pitch’ to legal counsel.
- Be a partner and a collaborator. I was very happy to have legal interns to help me with the first draft, as they certainly had knowledge and expertise I do not. And I was very happy to have a seat at the table with attorneys from across the System when the revised RRS was being created, as I was able to express my interest as an archivist in retaining certain types of records.
- Be flexible. Although I had originally wanted (and drafted) a very detailed RRS, ultimately the current version was very likely the best way to start the conversation and the process. It is better, I think, to have something than nothing. It is unclear at this point who will be responsible for maintaining and revising the schedule, but I’m optimistic that we’ll come up with some way to make this work.
I’m the novice in this room and I’m looking forward to learning from everyone else at
this session.
Thank you.

Thank you.