



2014

Local government records management: a case study of Bellingham, WA

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**Local Government Records Management:
A Case Study of Bellingham, WA**

By

Katherine Magee

Accepted in Partial Completion
Of the Requirements for the Degree
Master of Arts

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MASTER'S THESIS

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Katherine Magee

May 22, 2014

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A Thesis
Presented to
The Faculty of
Western Washington University

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May 2014

Abstract

While many authors have compiled guides and treatises on records management in general, employees of local governments such as counties and cities have a scarcity of sources to reference. Despite many local governments falling under the purview of their state archives or equivalent, specialized, practical guides in applying records management principles in today's economic climate are crucial to the success of a local government's records program. This thesis compares the writings of several authors on records management theory, including some writings specially tailored to local government records management. This comparison reveals similarities running throughout all the authors' works, even in those from the beginnings of the field in the United States.

The City of Bellingham, Washington is used as a case study to examine the situation of a local government's records program under increasingly difficult operating restrictions. An overview of the different departments' knowledge of records management requirements and existing recordkeeping practices reveals crucial areas that need to be addressed both for the City of Bellingham and in local government records management theory.

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Introduction

Records management has a vital and specific role in government, particularly local government. While archivists and records managers, especially those with a historical background such as myself, see the value in these records for evidence of the developing history of our country, possibly the more important value in a democratic country such as the United States, is that of providing our citizens with a way to hold our government accountable for the actions they take on our behalf. The openness of our government's records is not unique to the United States, but is still not a standard everywhere.

Records management is still in its infancy compared to many other professions. In the United States, records management “officially” began in the 1950s, under the direction of the National Archives, due to an “explosion” of government records during and following World War II. However, the United States' government dealt with the issues of keeping records much earlier in its history, notably with the 1887 Cockerell Committee and in 1889 with the passing of the General Records Disposal Act.¹ The Cockerell Committee served as the “first comprehensive legislative inquiry into administration.”² The result of this committee was the passage of the General Records Disposal Act in 1889, which allowed government agencies to dispose of “useless” government records and remained the main authority under which government agencies destroyed records until the National Archives Act in 1934.³

¹ William Saffady, *Records and Information Management: Fundamentals of Professional Practice* (Lenexa, KS: ARMA International, 2004), 9.

² Oscar Kraines, “The Cockerell Committee, 1887-1889 First Comprehensive Congressional Investigation into Administration,” *The Western Political Quarterly* 4, no. 4 (1951): 583.

³ Frank L. Wells, Garrard B. Winston, and Henry P. Beers, “Historical Development of the Records Disposal Policy of the Federal Government Prior to 1943,” *The American Archivist* 7, no. 3 (1944): 186, 187.

William Saffady defines records management as “a specialized business discipline concerned with the systematic analysis and control of recorded information, which includes any and all information created, received, maintained, or used by an organization in accordance with its mission, operations, and activities...by definition, records contain information that is 'written down' as opposed to merely memorized or exchanged verbally.”⁴ Under this very succinct, yet broad definition, any sort of business or organization automatically creates records, no matter what its purpose is. As Saffady points out, the profession has undergone multiple “refinements” since its birth, partly to do with evolving understanding of the principles of records management and partly due to evolving formats of said records.

There is by no means any shortage of archival theory on how to run an archives or records management program. Slightly less available is recent, relevant theory tailored in a useful manner to local governments, i.e. cities or counties. In doing research into existing local government records management, I found a dearth of material from within the last ten to fifteen years. The majority of writings on this topic stem from the beginnings of records management in the United States to the 1980s on the more recent end of the spectrum. Whether or not this is because local governments frequently fall under the guidance of a larger government body such as a state or federal agency and thus have guidelines supplied to them is not readily apparent. However, especially after serving as a records assessment intern for the City of Bellingham, Washington, I believe a focus on local government records to be imperative, given the types of records produced and the circumstances under which local governments operate. More recent writings on what is and isn't possible and what

⁴ Saffady, 1.

should or shouldn't be focused on is needed, especially during the difficult economic situation of the past five years which has strained the finances of governments and businesses alike. Despite many local governments falling under the purview of their state government, guidance for the records keepers of those governments on practical ways to manage their city or county records is imperative to keep their heads above water in days of budget cuts and changing or diminishing staff.

Using the City of Bellingham as my case study, I will examine where the existing records management theory falls short in our current situation. First, I will discuss the history of records management theory, both generally and in existing local government writings. Second, I will outline how records management stands in the City of Bellingham. In this second chapter, I will discuss what I was tasked with doing over the course of my internship during the summer of 2011 and the common threads that I found among the different departments. I will conclude with an analysis of where records management theory stands strong or doesn't fit, based on my findings in Bellingham, and make suggestions as to how it could be adjusted to better guide records managers in protecting local government records.

Chapter 1: Records Management Theory and Local Government

Records management has a key role in government at all levels: federal, state, and local. It is the federal level that is the focus of much of the writing on government records management subject. Archivists and records managers, especially those with a historical background, see the value in these records for evidence of the developing history of our country. However, the more important value in a democratic country such as the United States is that of providing its citizens with a way to hold its government accountable for the actions they take on our behalf. In this chapter, I will compare several authors' ideas on records management, commenting on its current applicability in regard to local government. I will start with a discussion of the broad theory of records management, and then continue with an overview of writings focused on local government.

T.R. Schellenberg, writing during the infancy of the profession of records management in the United States, was not only the father of much of archival theory, but also that of records management. Writing on records management in his opus *Modern Archives* in 1956, he points out the necessity of developing a profession devoted to managing records before they reach their archival stage, due to the dramatic increase of paper records in the federal government. While he doesn't specifically cite World War II as a contributing factor in these chapters on records management, he does claim "the population increase in turn has made necessary an expansion of governmental activity; and this expansion has had its effect on record production. As technological methods have come to be applied to the production of records, their growth, in the last several decades, has been in a geometric, rather than an

arithmetical ratio.”¹ As he was writing in the 1950s, right after World War II and in the midst of the baby boom, it is clear that WWII was a contributing factor.

As he says “little is done within government that is not made a matter of record.”² He also asserts that the amount of records produced is influenced by how a government agency functions, i.e. how it uses its records in its daily business.³ If it depends heavily on records or documents in the running of a government, then obviously it would produce more and thus, need to maintain a greater number of records. Schellenberg indicates that the extra records governments were producing had created some fundamental problems in controlling records. As a reaction to this dramatic increase in the production of paper records, “each agency or office adopted the system of its preference so that there was no uniformity of system from agency to agency or, within agency, from office to office. Nor was there any uniformity in the ways in which the different systems were applied.”⁴ The problem with this, as Schellenberg argues, and with which I concur, is that the primary purpose of managing public records – “to make the records serve the purposes or which they were created as cheaply and effectively as possible, and to make a proper disposition of them after they have served those purposes” – is not achieved.⁵ He says that “records are efficiently managed [only] if they can be found quickly and without fuss or bother when they are needed, if they are kept at a minimum charge for space and maintenance while they are needed for current business and if none are kept longer than they are needed for such business unless they have a continuing value for purposes of research or for other purposes.” Schellenberg's solution to

¹ T.R. Schellenberg, *Modern Archives: Principles and Techniques* (Chicago: Society of American Archivists, 2003), 35.

² Schellenberg, 38.

³ Schellenberg, 36.

⁴ Schellenberg, 37.

⁵ Ibid.

this problem is that someone needs to have a hand in managing these records “from the time they are created until the time when they are [archived or disposed of].”⁶ In other words: records managers.

Schellenberg writes about his recommendations, the important aspects of records management, and the problems with identifying records. Continuing his discussion of federal government records management, he writes: “the most important aspect of records management relates to the use of records for the conduct of governmental operations. Little is done within government that is not made a matter of record.”⁷ This explains Schellenberg's identification of the explosion of records: it came with the explosion of governmental functions. The most important types of records are those pertaining “to the origins, organizational and functional developments, and the major programs of an agency.”⁸ While these seem like simple definitions, as Schellenberg cautions, these important records are not so easy to identify. The issue is that “records cannot always be identified as [important] when they are first created” and he gives policy records as a specific example of this.⁹ Records tend to be filed as they are created, and one thing may eventually become the basis or early stages of a certain type of record but initially be filed elsewhere, and possibly never joined with its proper file. Due to these difficulties in identifying records as belonging to a certain type, Schellenberg insists that there be a dedicated records manager, someone “of a highly specialized type” with “specialized competencies and a specialized background of experience” and that “whenever possible the specialized staff should be attached to a staff

⁶ Ibid.

⁷ Schellenberg, 38.

⁸ Ibid.

⁹ Schellenberg, 39.

agency, that is, one that has jurisdiction in certain matters over all other agencies of the government.” While I agree that this idea is best practice, local governments may not have the budget or capability of hiring specialized and educated records managers.

Authority is a crucial component to records management. For example, Schellenberg describes the varying functions records management staff might have, from “simple inspection to complete regulation of the record work of line agencies.”¹⁰ He also recommends that the centralized records management staff should have *authority* in the disposition of records, both to “require agencies to develop disposition plans for records and to submit such plans for review to the archival authority [and] to require agencies to report on the disposition of their records.”¹¹ He prefers this authority to be removed from the production and maintenance of the records – having the central records management staff be more of an analytical source of information for the separate agencies to come to for guidance in managing their own records.¹² Their job is to promote records management among the agencies, specifically the objectives of “economy” and “efficiency” – “words that have become almost inseparable among those concerned with the methods of government administration.”¹³ Schellenberg emphasizes that there needs to be a separate records management staff that guides individual agencies in economical and efficient records production and management.

Schellenberg also warns of some of the pitfalls that arise when working with records and advises on how to combat them. For example, he describes a habit not only limited to

¹⁰ Schellenberg, 40.

¹¹ Schellenberg, 42.

¹² Schellenberg, 41, 42.

¹³ Schellenberg, 43.

records management: “as a government agency is assigned particular responsibilities, little attention is paid initially to how they are discharged. In the course of time, faulty working methods are likely to develop.”¹⁴ This problematic practice is especially dangerous when dealing with records, as “faulty working methods” make finding and using records difficult down the line. The records management staff should be involved so more attention is paid to how records management principles and practices are implemented to ensure they are implemented properly. Since “records are only a byproduct of administrative activity, their creation is not an end in itself.” Agency staff either might not realize that what they are working with are records or might mismanage them, falling into habits such as not keeping track of where the original records are stored.¹⁵ Without proper practices and guidance in place, “duplication then becomes a substitute for control of the movement and distribution of documents.”¹⁶ Schellenberg warns against creating extra and unnecessary copies of documents since this will increase problems with properly maintaining the originals and the copies. Records become harder to find, office of origin will become confused, and records may either not be kept long enough or overly long.

Improper methods can be corrected through organization and “classification” of records. As Schellenberg writes: “classification is basic to the effective management of current records.”¹⁷ Without the knowledge of what type of records exist for the agency or how they are filed, records management becomes an impossible task. Schellenberg's preferred method of classification is by “organization and function,” since if they are

¹⁴ Schellenberg, 45.

¹⁵ Schellenberg, 46.

¹⁶ Schellenberg, 49.

¹⁷ Schellenberg, 52.

classified in such a manner they can easily “be disposed of in relation to organization and function.”¹⁸ Once a classification system is figured out, and Schellenberg recommends the “keep it simple” approach, records should be filed according to that system.¹⁹ Records should be filed as separate “file units...established for all transactions;” thus, “whenever a transaction relates to a person or corporate body, or a place, the records pertaining to it can be brought together fairly easily.”²⁰ Those individual file units should then “be grouped into larger units...in relation to activity.”²¹ By determining the classification system of an agency's records, organizing and filing according to it, and sticking with it, agencies may avoid many of the problems associated with managing a large amount of records and only create what is absolutely necessary.

While Schellenberg's recommendations are almost sixty years old, they are still extremely useful in understanding the necessity of records management, understanding it as a profession and defending it in the face of budget cuts. In fact, his recommendations form the basis of all developing theory after him. Even though his concern was with federal government agencies, the principles he espoused fit into any organization that produces records and are even more easily applicable to a local government situation, merely replace “agency” with “office,” “department,” or “division” and his recommendations become tailor-made for a city or county.

Nearly fifty years later, William Saffady also wrote about records management. He is the author of several books designed to help those in charge of managing records, typically

¹⁸ Ibid.

¹⁹ Schellenberg, 92.

²⁰ Schellenberg, 57.

²¹ Schellenberg, 58.

more practical guides, but still containing theory. Saffady, like Schellenberg earlier in the profession's history, finds that “the volume and complexity of recorded information [has] risen dramatically, even exponentially, in recent decades.”²² Saffady attributes this to the increased “scope...and complexity” of business and governmental activities, again, just as Schellenberg did post WWII. He also attributes this growth to the growth of white collar business relying on recorded information to do business, increase in “prominence and economic significance” of “information-intensive” industries, the increase of governmental regulations regarding different industries and their record-keeping requirements, and, of course, the widespread use and dependence on computers, scanners, and photocopiers.²³ While Schellenberg focused mainly on discussing government agencies' need for records management, Saffady deals with the business world as well; and as Schellenberg dealt with an “explosion” of paper records, Saffady writes about the challenges brought about by both increased paper and electronic records, demonstrating that while the formats may change the core guidelines remain the same.

Saffady also puts an emphasis on the ownership of records, saying that the “corporation, government agency, academic institution, or other organization is the owner of all records created, received, and/or maintained by its employees...in connection with the organization's mission, business operations, and other activities.”²⁴ Saffady, backed up by ISO 15489-1, defines an organization's records as an asset when records management is treated systematically.²⁵ Saffady places such emphasis on the *organization's* ownership rather

²² William Saffady, *Records and Information Management: Fundamentals of Professional Practice* (Lenexa, KS: ARMA International, 2004), 3.

²³ Ibid.

²⁴ Ibid.

²⁵ Saffady, 4, 11.

than the *individual employees'* ownership due to a persistent idea that what an individual creates in his job is his to do with as he pleases. Differentiating these “official records” from the “non-records” created is difficult, but that is the purpose of a records management system.²⁶ He says that records management is a “problem-solving discipline.”²⁷ Saffady identifies many of its “problems” to be financially related, and echoes Schellenberg's desire for ease of use and access for the “agency.” Saffady's “systematic records management” is achieved through (1) determining retention of records, (2) ensuring compliance with record-keeping laws, (3) managing inactive (infrequently accessed) records, (4) organizing active (frequently accessed) records for efficient retrieval, and (5) protecting vital records. In following these guidelines, records are easier to use and an organization will reduce the operating costs of a records management program, which is a “necessary but expensive activity.”²⁸ For example, sending inactive records to an off-site storage center and organizing the active records on-site can reduce the cost of dealing with “voluminous” records requiring a significant amount of space.²⁹ Keeping records organized and following laws and regulations will also limit/minimize legal exposure and litigation repercussions, which would lower an organization's operating costs as a whole.³⁰

A systematic records management function does not just happen on its own. Records management is a “staff function,” i.e. it requires staff to run it and thus must be placed somewhere in the organizational structure.³¹ For example, “in government, the records management function is often based in an archival agency,” since through an archive's

²⁶ Saffady, 7.

²⁷ Saffady, 8.

²⁸ Saffady, 13.

²⁹ Ibid.

³⁰ Saffady, 14.

³¹ Saffady, 15, 16.

involvement, the records policies can be formulated for long term preservation for records with “enduring value.”³² In the United States, the working model for this format is the National Archives and Records Administration, or NARA. Frequently, state government mimics their format. For example, in New York State, the state archives are authorized to oversee state agencies’ records management processes.³³ This is also the case with the state of Washington. Saffady says that “generalizations about the records management function's employees and their duties are complicated by the considerable variety in staffing levels among records management programs.”³⁴ This is his wordier version of the dreaded “it depends” answer to most archival/records management questions asked by the students of the profession in attempting to clarify a potential problem in their future work environment. Obviously more work is spread out in programs with multiple staff members, whereas with one person fulfilling the role, the different departments or agencies may be more on their own for inventorying and managing their records with the lone records manager serving as a guide.

Whether a program has one staff member or several staff members, Saffady details the common tasks and requirements that a records management program needs to perform. These recommendations are given in more of a practical “how-to” manner, but they are still grounded in the theory of records management tasks. They are also given in a way for fledgling records management programs to get started. For example, he begins by recommending a records inventory, for the ultimate purpose of making retention schedules.³⁵

³² Saffady, 16.

³³ Ibid.

³⁴ Saffady, 18.

³⁵ Saffady, 23.

Most established records management programs, especially those in government, do not need to make their own schedules and typically are aware of most of the records they have.

However, it is also a good idea for even established records programs to complete a records inventory periodically to determine the size of the organization's holdings and to ensure that records are not “slipping through the cracks.” Records that should be kept under their own retention rather than under a different type of record’s retention are revealed through a record inventory. A records manager might not even know what records are out there without a periodic records inventory done. Without the knowledge of what records exist in the organization, a records manager, or their equivalent, would be unable to properly perform their job and risk improper records retention and disposition.

Since records document the business operations of an organization, they are evidence that auditors and courts need; therefore, regulations and laws exist to govern the retention of these records.³⁶ Organizations can be hit with “costly penalties” for neglecting to follow these laws.³⁷ One of a records manager's crucial duties is to identify records laws that apply to his or her organization, in order to prevent unlawful disposal of records and possible fines.³⁸ This is where I find Saffady’s recommendations to be overreaching a bit. While it is important for a records manager to be aware of the laws regarding government records, the complication of said laws and the likelihood of an employee being hired without an extensive records background could make this very difficult. I believe that this call, when needed, would be best made in conjunction with a staff member of the local government’s legal department.

³⁶ Saffady, 53.

³⁷ Ibid.

³⁸ Saffady, 54.

Laws also determine which records are admissible in court.³⁹ The basis of court admissible records is one of the key tenets of records management: authenticity. Especially important with electronic records, ensuring that a record is authentic, or what it is claimed to be, is the job of a records manager. Again, this is implying that every records management program has a highly educated person in charge. I think that the recommendation should be more of an encouragement for continued cooperation between the records manager and the IT staff of the organization, who would have the technical savvy to implement the records manager's records requirement recommendations. Saffady describes the concerns of authenticity relating to electronic records – how the ease of use, altering, storing, and most especially deleting gives an air of unreliability to computer created records.⁴⁰ An IT employee or expert would be able to provide technical evidence of authenticity that a records employee may not have, especially in smaller local government agencies where the budget prohibits hiring a certified records manager. Ultimately, authenticity and proper retention schedule implementation are imperative for an organization to survive records requests for litigation purposes. Only by proper following of a retention schedule can an organization protect itself by having or not having certain records.

For administrative purposes, retention requirements are not only legally based, but also operationally based for the use of an organization's employees.⁴¹ Some retention requirements are not based on laws or legal requirements at all. This is the area where a record's "life cycle" comes into play – when the record is actively used, inactive but still having a chance of being needed, and when it has no further use to the organization. Some

³⁹ Saffady, 59.

⁴⁰ Saffady, 61.

⁴¹ Saffady, 65.

records have a particularly long life cycle; they might be needed permanently for an organization to operate. These types of records supply an even more difficult aspect to managing electronic records. Technology has yet to produce a proven, long-term reliable storage medium for electronic records, partly due to the variety and ever changing nature and format of software and hardware. As of yet, the only viable solution available to electronic records programs is to continually migrate the data. Saffady defines data migration as “the process of periodically converting electronic records to new file formats and/or new storage media.”⁴² However, as Saffady points out, just because it is a solution does not mean it will work in all situations. The commitment and difficulty in migrating certain types of records can seem astronomical and expensive for an organization, especially as long term records must be continually migrated.

For long term to permanent paper and even computer produced records, one of the better methods of storage is through the use of micrographics, usually referred to as microfilm. Documents, either paper or electronic, are either photographed and developed as film or are output from the computer onto film (COM or computer-output microfilm).⁴³ The advantages to microfilm technologies (when done correctly) for records management are that it offers compact storage with “superior stability, minimum system dependence, and legal acceptability.”⁴⁴ Microfilming can reduce the space for storage requirements by up to 95 percent or more.⁴⁵ Microfilming can be quite expensive, however, so, as Saffady advises, it should be implemented “judiciously,” preferably for records kept longer than 10-15 years

⁴² Saffady, 68.

⁴³ Saffady, 97, 99.

⁴⁴ Saffady, 99.

⁴⁵ Saffady, 100.

and not as a replacement for proper records destruction and management.⁴⁶ Another author reports that “one cubic foot of records can be stored for 20 years in a records center before storage costs exceed microfilming costs.”⁴⁷ That citation was from a 1989 article and quoted in a book from 1996, and while technologies have advanced dramatically since then, it still serves to reiterate that microfilming is expensive and should only be undertaken after careful consideration of the best options. Microfilming is also an ideal method to backup vital or essential records (records that “contain information essential to an organization's mission” and are necessary to continuing operations).⁴⁸ The focus is now so heavily on digitization that this potential space saving method of retention for long term to permanent records is being forgotten and overlooked, especially considering that COM can be used for the unstable electronic records retention.

One of the key features of a records program is the records center, used as an “economical, high-density storage” for inactive records.⁴⁹ The center may be in-house or contracted out to a commercial records center, or a bit of both.⁵⁰ Saffady says that “records center operations are typically integrated with and provide essential support for an organization's retention initiatives.”⁵¹ He encourages that language be put in the retention schedule with instructions for transferring records to the records center, including the records center performing the destruction or disposition of records at the end of their retention

⁴⁶ Saffady, 99.

⁴⁷ Marie F. Hollings, CRM, *Should Local Governments Microfilm Records?* NICLOG Technical Leaflet 103 (American Association for State and Local History, 1989), 1, quoted in Julian Mims, *Records Management: A Practical Guide for Cities and Counties* (Washington D.C.: International City/County Management Association, 1996), 142.

⁴⁸ Saffady, 104.

⁴⁹ Saffady, 77.

⁵⁰ Ibid.

⁵¹ Ibid.

period. The authority over the records remains with the creating offices, the records center staff “merely serves as a physical custodian.”⁵² Records centers serve as a crucial aspect of a records management program due to the cost savings from the maximized storage density gained by floor to ceiling shelves in a lower cost building setting.⁵³

Probably one of the more important aspects of a records center is its environmental controls. Records require certain conditions in order to be preserved properly. For example, as Saffady points out, “heat accelerates chemical reactions that can damage paper and non-paper media,” and when combined with a high humidity can encourage the growth of mold and fungi.⁵⁴ The longer the records need to be kept the more “stringent” the environmental controls need be. Many records centers have a variety of records, some needing permanent retention, and the recommended environmental guidelines are for a “maximum temperature of 70 degrees Fahrenheit (21 degrees Celsius) with relative humidity ranging from 30 to 50 percent.”⁵⁵ If the ideal temperature is not able to be met, the most important aspect is not to have rapidly fluctuating temperatures and humidity.⁵⁶ The limit of light exposure is important to prevent records degradation, and Saffady recommends trying for a windowless space.⁵⁷ These environmental controls are where the knowledge of someone without records education might fall short. Emphasis on getting records center buildings set up properly for local governments is essential, and I agree with Saffady dedicating a significant portion of his text to outlining proper requirements.

⁵² Saffady, 79.

⁵³ Saffady, 79.

⁵⁴ Saffady, 86.

⁵⁵ Ibid.

⁵⁶ Saffady, 87, 88.

⁵⁷ Saffady, 81.

Besides just storing the records for an organization, the records center is also service based, which includes picking up records from off-site offices, accessioning new records, retrieving records requests, delivering said requests, putting away returned requests, and destroying records for offices when their retention period is up.⁵⁸ One thing that Saffady cautions is that a records center is for *inactive* records, and is not a “reference library,” i.e., occasional requests are acceptable, but if records are requested on a frequent basis, it is a sign they have been improperly scheduled and are not truly “inactive.”⁵⁹ With these services, “all records center operations depend on accurate packing, labeling, and inventorying containers.”⁶⁰ Saffady instructs that the individual offices do this on a container level, and that the records center staff must provide clear instructions for completing these tasks. To make this task easier, records management staff should also help to adjust or introduce new document filing systems in the offices, just as Schellenberg recommends. Like Schellenberg, Saffady emphasizes the importance of good filing systems for easier records management, for example enabling a detailed container inventory list for transfer to the records center. This is where the recommendations are possibly unrealistic for current local government records management staff.

An aspect of filing systems where Saffady differs from Schellenberg, and that really is only because it was not an issue during Schellenberg's time, is in automated document storage and retrieval, where “filing” is achieved on computer systems through indexing.⁶¹ Indexing uses “a list of names, identifiers, subject terms, or other descriptors together with

⁵⁸ Saffady, 90.

⁵⁹ Saffady, 91.

⁶⁰ Ibid.

⁶¹ Saffady, 175.

references (pointers) to the documents with which the descriptors are associated.”⁶² With electronic records and indexing, the physical arrangement of the records is “immaterial.”⁶³ Rather, the indexing parameters (the categories of information “by which documents will be indexed for retrieval”) are what is crucial to successful management.⁶⁴ Indexing works for digitally born records and also for paper or microfilm records that are converted to electronic images, most commonly through scanning.⁶⁵

While Schellenberg and Saffady wrote records management theory on a broader level, Bruce Dearstyne and Julian Mims have both written guides for local government records management. For my examination of local government records management, I found them more helpful than Schellenberg and Saffady. As Bruce Dearstyne writes in the preface to his book for local government agencies, “records are essential by-products of local government activity and, in turn, provide information that keeps government programs going. Local governments could not operate without their records.” He echoes what Schellenberg and Saffady indicate in their works: that records are crucial to the operation of an organization. Dearstyne adds however, that local government officials do not always see this aspect, instead seeing “problems: overwhelming volume, too little space, difficult retrieval, inefficiency, and too many tax dollars being spent with little result.”⁶⁶ I believe this view is especially prevalent with the ever-tightening budgets in today’s government. Officials may be concerned with budget and don’t necessarily see what goes on behind the scenes, or may not realize what records management has to offer the agency in terms of savings and

⁶² Ibid.

⁶³ Ibid.

⁶⁴ Saffady, 176.

⁶⁵ Saffady, 181.

⁶⁶ Bruce Dearstyne, *The Management of Local Government Records: A Guide for Local Officials* (Nashville: American Association for State and Local History, 1988), vii.

protection. Dearstyne writes about four “assumptions” which records managers would recognize as important tenets of RM theory. These tenets are as follows:

- Local government records are important resources that can and should be managed; just as any other resources of government are managed.
- Local officials want to do a good job managing records, but often need management and advice.
- Records management techniques are not mysterious or costly and can apply to any local government.
- Records management is a winning proposition for local government – it pays off in cost savings, better information control, and improved preservation of historical records.⁶⁷

These presume that there is not an existing records program, but aspects of them would still apply to an existing program, especially if it had fallen under the purview of a new department.

Dearstyne advises local government officials that part of their mandate in working for government is to “create order from chaos.”⁶⁸ The chaos could describe any aspect of government work, but he specifically refers to the chaos that grows from the “alarming rate” of accumulation of records, whether their agency is in “the smallest village or the biggest merged urban-county government.”⁶⁹

For Dearstyne, “local government records” include “practically any type of information received or created during the process of official government business.”⁷⁰ This definition matches those given by Schellenberg and Saffady in regard to federal government and other organizations. The information contained in records allows both government

⁶⁷ Ibid.

⁶⁸ Dearstyne, 3.

⁶⁹ Ibid.

⁷⁰ Dearstyne, 3.

agencies and the public to know “what happened, to whom, and why.”⁷¹ Government officials “depend” on such records from “their own files” in order to do their daily jobs; without records “government would come to a standstill.”⁷² Local government records are important, and may be on a more personal level with the public than records of some other organizations. They “document both the rights of the citizens and the responsibilities of government.”⁷³ He gives several examples of this, including deed books showing “legal ownership and boundaries,” voting records, and tax records.⁷⁴ Dearstyne also names local government records as being important tools for research, citing lawyers as an example of a group commonly needing such records.⁷⁵ Most importantly, they provide accountability for the local government and belong to the citizens.⁷⁶ He quotes H.G. Jones, saying, “Indeed, because records document the conduct of the public's business -- including the protection of rights, privileges, and property of individual citizens -- they constitute a species of public property of a higher value than buildings, equipment, and even money, all of which usually can be replaced.”⁷⁷ This all underscores the importance that local government records hold for the citizens of a municipality or county and why effort should be made to ensure that the records staff at local government agencies have support from their organization and resources tailored specifically to their needs, despite having retention decisions made by their state.

⁷¹ Ibid.

⁷² Dearstyne, 5.

⁷³ Dearstyne, 5.

⁷⁴ Ibid.

⁷⁵ Dearstyne, 6.

⁷⁶ Dearstyne, 6, 7.

⁷⁷ H.G. Jones, *Local Government Records: An Introduction to Their Management, Preservation, and Use* (Nashville, 1980), p 23-24, quoted in Dearstyne, 7.

Dearstyne claims that it is "obvious" that the care and management of local government records "can't be left to chance," and I agree.⁷⁸ However, despite records programs being more likely to exist than not, in today's environment of budget and staffing cuts, local government heads may not see this "obvious" necessity. Therefore it is critical that each local government have a records management program, either established or in the works. Such programs should do the following:

- Encourage the creation of records that contain accurate, complete, and usable information.
- Ensure that information is recorded and maintained as efficiently as possible.
- Discourage the creation of unnecessary records.
- Minimize the workload on staff who are responsible for filing, maintaining, and retrieving records. Provide information quickly and easily when needed by government officials and the general public.
- Ensure the periodic, systematic, and legal destruction of records that have no further administrative, legal, fiscal, historical or other research value.
- Identify, preserve, and encourage the use of records with enduring value for historical or other research.⁷⁹

Under these guidelines, Dearstyne specifies more "basic elements" including that the program is acknowledged as "an important administrative function and is supported by legislators, chief elected officials, and office managers at all levels," employees must be trained in the basics of records management, and "overall responsibility is clearly assigned."⁸⁰ He says that records management is a "bargain" for local government, saves money in the long run, and, at the very least, helps the organization "deal more effectively with information."⁸¹ Julian Mims emphasizes this as well with an example of a situation in Tampa, Florida, saying that through their attention to retention periods and recycling paper at

⁷⁸ Dearstyne, 7.

⁷⁹ Ibid.

⁸⁰ Dearstyne, 8.

⁸¹ Dearstyne, 10.

the end of them the city gained \$20,200 over a five year period.⁸² Again, Dearstyne and Mims are not writing anything new or revolutionary, as shown by Saffady and Schellenberg's recommendations and ideas above, but the repetition of the same concepts across the board emphasizes their importance.

I believe more local governments have at least some version of records management in place due to the higher profile aspect of government and corporation records than when Bruce Dearstyne was writing in the late 1980s. He writes about establishing a records program in local government. He says that “coming to grips” with setting up a records program involves “solving problems in stages,” and recommends first dealing with the backlog, then deal with the current records, and finally “set the stage” to deal with records management in the future.⁸³ I don't necessarily agree with this from a practical and needs based point of view. I would say to start with current records and develop procedures, then go to work on the backlog. There is of course a danger in this of never getting to the backlog, but I would say there is an even bigger danger of being perpetually stuck in the backlog and never getting to current or future records. They would just become part of the backlog and the records manager would always be behind.

Dearstyne also emphasizes the need to establish a records program so that successful records management is not a “single victory” but a program “built into the government's structure, a program that operates with clear legal authority and has the resources and support needed to do the records management job.”⁸⁴ This echoes arguments from Schellenberg and

⁸² Julian Mims, *Records Management: A Practical Guide for Cities and Counties* (Washington D.C.: International City/County Management Association, 1996), 5.

⁸³ Dearstyne, 12.

⁸⁴ Ibid.

Saffady on the importance of a records program having authority. Most important to the RM officer's support system are the local government leaders, Dearstyne emphasizes, particularly during the establishment of the records program.⁸⁵ I think this is important, but that he should also have emphasized that their support is crucial during all aspects of the program's operation, especially when broad changes need to be made or even to keep the program going. Quite possibly the most important aspect of the above, especially in allowing a program to succeed and have authority, is to have it operate under the power of law.

Dearstyne says that an ordinance, law, resolution, or so on dealing with records management is needed. He recommends several elements necessary for inclusion in the law, including that records management is a "continuing administrative function" and a definition of "records."⁸⁶ He also recommends that the records program's goals and objectives should be included and, in my opinion most importantly, the program's authority and responsibility.⁸⁷ I think the most important things to be included in a records management law are the need and objective for the records program, the definition of records, and the authority of the program, with more detailed information and processes put into policy and/or procedure for the city employees. Without an ordinance or the equivalent in place, how can a records manager or coordinator attempt to enforce the records procedures developed?

Dearstyne points out that having a program is not enough, there must be someone to "make it happen," this person being the local government "records management officer" – referred to from here on as the RM officer.⁸⁸ Mims writes that "records are where you find

⁸⁵ Dearstyne 17.

⁸⁶ Dearstyne, 13.

⁸⁷ Ibid.

⁸⁸ Dearstyne, 14.

them and must be dealt with whoever has the duty (and sometimes the conscience)," this person being someone such as the county manager or city clerk who "traditionally [has had] more records duties than any other municipal official."⁸⁹ Dearstyne warns that for small to medium sized governments, "it's unlikely that [they] will have a trained records manager on staff;" thus, an employee designated as the records management officer is frequently whoever is "willing to learn the rudiments of records management and coordinate records management efforts."⁹⁰ On the flip side, larger local governments may have the ability to hire a professionally trained records manager to oversee the program and designate a clerk or other employee for the "functional responsibility."⁹¹ I find this to be one of the more crucial pieces of information that Dearstyne presents, and it is an area which calls for more focus in the records management literature. Due to how job classes are drawn up, how budgets stand, or what the city or county staff needs, hiring a specially trained records manager may not be possible. While this may be a grim outlook for someone entering the professional field, it is the reality of the current local government arena. This possible lack of a records background should be reflected in more of the literature. The idea here is to have a dedicated staff person whose job is to help manage the records, which may not always work out, as Mims describes when an employee is just "handed" the "records person" job, often a "full-time job disguised as a part-time endeavor."⁹²

Dearstyne emphasizes that the RM officer is not the "czar of records," rather he or she is a coordinator for the individual employees in charge of their department's or office's

⁸⁹ Mims, xii.

⁹⁰ Ibid.

⁹¹ Ibid.

⁹² Mims, xiii.

records. Part of this coordination effort is working with other officials to “develop and maintain” the city records program, conduct an initial record survey and inventory, “encourage and coordinate” records destruction and disposition according to state procedures, serve as a “liaison” to the state archives or records management office, provide workshops, etc. for local government employees on records management practices, and so on.⁹³ Mims believes that a key aspect of a local government records manager is their “records management writing.”⁹⁴ Records managers must use their writing (i.e. memos, manuals, etc.) to get their program’s goals and procedures across, a way to “implement and control records policies through people [they] do not supervise.”⁹⁵ The importance with this writing is to ensure that one’s audience is not “turned off” from paying attention to records management communications. The goal is to “explode misconceptions” that records management is boring or unimportant and to make the message “leap out at the reader.”⁹⁶ Mims argues that having strong writing can be a powerful tool for a record manager to ensure program success.

One of the key differences between local government records management and organizational or federal records management is that cities and counties fall under the authority of the state. Dearstyne conveys that “states want to ensure the documentation of state-mandated or supported programs administered through local government, as well as guarantee the availability of records for audit and other oversight functions.”⁹⁷ States are also involved in the historical aspects of records, by ensuring that archival records are

⁹³ Dearstyne, 15.

⁹⁴ Mims, 154.

⁹⁵ Ibid.

⁹⁶ Mims, 155.

⁹⁷ Dearstyne, 19.

preserved.⁹⁸ Most states provide “specific guidelines” for the disposition of records, more than likely requiring state approval before final destruction.⁹⁹ He also describes the commonality of state laws providing for the microfilming of local government records and for the subsequent disposition of those records, provided the state gives approval.¹⁰⁰ Mims echoes the recommendation for disposition and destruction after scanning since “space savings is one of the primary reasons for filming,” also emphasizing the importance of having state approval and a “meticulously” attended and documented filming process to ensure proper standards and disposition process are being followed.¹⁰¹ Scanning is the most current technology which also applies. Mims describes the benefits of a “hybrid approach” of microfilming and scanning (although when he was writing it was optical disk technology), including the ease of converting from film to digital “on demand” as requests are made, although this is only possible in offices that have film to digital hardware capabilities.¹⁰² These varied state guidelines are enforced in almost every state by a dedicated office responsible for working with local government records staff. Usually, but not always, these offices are in the state's archival or records management programs. These offices also “regulate the disposition of local government records, either by establishing minimum required retention periods, or through review of requests from local governments that want to throw away records...they may issue records retention and disposition schedules -- documents that indicate how long various classes of local government records must be retained.”¹⁰³ In some states, “local governments must initiate their own records retention and

⁹⁸ Ibid.

⁹⁹ Dearstyne, 20.

¹⁰⁰ Ibid.

¹⁰¹ Mims, 132.

¹⁰² Mims, 140.

¹⁰³ Dearstyne, 20.

disposition requests... [and] state permission must be secured before disposition is carried out" usually through either the submission of a schedule to the state for approval (and the submitted schedule remains in effect for the local government until approval is withdrawn) or through permission to destroy specific records.¹⁰⁴ Sometimes there is a mix of both. In the state of Washington, cities originally submitted schedules to the State Archives for approval, but now the State Archives writes and provides them. This is a significant difference, and maybe even an advantage, that local government records management programs have from other records management programs: their records retention and disposition is often decided for them. They do not necessarily have to create retention rules on their own. The advantage here is that establishing and maintaining a records program is made simpler without having to develop records retention schedules, meaning that staff and budget time are saved.

Dearstyne's and Mim's recommendations and detailing of records management concepts for the further set-up of a records management program do not differ from Saffady's or even Schellenberg's (i.e. vital records program, filing systems, etc.). Rather they specify the concepts to local government. For example, Dearstyne says that after establishing the records program, the next step is to take an inventory of the records, probably beginning with an informal survey before moving on to the "full-blown inventory."¹⁰⁵ Mims warns that proper preparation for a "full blown inventory" could take as much as six months.¹⁰⁶ Mims also emphasizes the importance of inventorying electronic records, especially due to their rate of growth, which at the time of his writing in 1996 was 20%-40% per year.¹⁰⁷ For those

¹⁰⁴ Dearstyne, 41, 44.

¹⁰⁵ Dearstyne, 23, 24.

¹⁰⁶ Mims, 8.

¹⁰⁷ Mims, 16.

local governments whose state provides retention and disposition schedules, this inventory is more for comparison's sake with the schedules; for those that do not, the inventory functions to develop schedules as in the organizations for which Saffady and Schellenberg are writing. Dearstyne recommends a report to the local government's chief executive officer and legislative body on the "findings and conclusions" of the inventory, both to draw attention to the effort and records management program and to display the cost savings and benefits achieved by the inventory.¹⁰⁸ This recommendation is also very useful for an established records program, perhaps in the attempt to garner more budget or staff. Mims recommends a directive from these same people before the inventory begins to give it authority.¹⁰⁹ The RM officer's post inventory duties involve keeping the local government's schedules current, usually by following changes to state requirements as well as the needs for retention had by the local government.¹¹⁰ The RM officer also needs to determine the status of newly created series, where they fit under the retention schedule and so on. The RM officer also needs to keep detailed records of what records are destroyed.¹¹¹

Local governments also fall under Freedom of Information requirements, and Dearstyne says that these in combination with privacy laws should shape the "strategies" in controlling records.¹¹² Such laws "usually prescribe conditions under which records are to be accessible or else indicate the conditions under which they may be withheld or closed."¹¹³ Dearstyne lists at least three effects these laws have on local government records:

- Access and privacy considerations must be taken into account when establishing

¹⁰⁸ Dearstyne, 30.

¹⁰⁹ Mims, 13.

¹¹⁰ Dearstyne, 50.

¹¹¹ Dearstyne, 51.

¹¹² Dearstyne, 61.

¹¹³ Ibid.

records-keeping systems for instance, special provisions need to be built into filing systems if selected documents or files are to be restricted or withheld from public inspection. This area has become even more complicated with the advent of technology, which allows for easy access to electronic files.

- Some state laws require compilation of subject-matter lists of records to guide Freedom of Information requests. Creation and maintenance of such a list might be tied to the records inventory, to the creation of file lists or indexes to filing systems, or to records retention and disposition schedules.
- Many of the state laws require local governments to designate a records access officer. This may be a logical assignment for the records management officer, in conjunction with his or her other records related duties. If not, the records access officer needs to work closely with the records management officer.¹¹⁴

The complex nature of FOIA and Public Records Requests, including the potential liability in releasing particular documents, suggests that a records management staff member may not have the knowledge or time to make these decisions.

Local governments, like the federal government, also have vital records, i.e., records that are essential to the successful continuation of daily business of the government. These records "need a high level of security and protection" from damages or theft.¹¹⁵ Some such records are payroll, accounts receivable, warrants-to-be-served, licenses, project files...rights and interests records" and so on.¹¹⁶ Dearstyne says that some states require special provisions for vital records or "duplication and dispersal" which involves making a copy and storing the copy at a "safe" distance away, making it improbable that both copies of the record would be destroyed.¹¹⁷ Records need to be protected from disaster situations, both natural and man-made.¹¹⁸ Mims reminds local government records programs that with "increasing proportions of information generated in electronic form encourage you to work closely with computer services in your vital records effort and to employ the mainstream of computer applications

¹¹⁴ Dearstyne, 61, 62.

¹¹⁵ Mims, 53.

¹¹⁶ Mims, 53, 54.

¹¹⁷ Dearstyne, 62.

¹¹⁸ Mims, 59.

when identifying and safeguarding vital records as they are created.”¹¹⁹ Each local government will need to devise its own vital records program and decide which of their records are vital to their operations. States such as Washington provide information for their local governments as to which of their records are considered “vital records,” and Washington recommends storing a microfilm backup of those records with their offices in Olympia. Despite being called “vital records” I suspect that the vital records back up is low on the priority list for many organizations battling other records issues.

Like any other organization, local governments have records which become inactive, and Dearstyne echoes Saffady and Schellenberg in recommending a "secure storage facility," or records center. He says that one "informal rule" for judging whether a record has become inactive is that it is referred to less than "once per month per file drawer."¹²⁰ He lists the same benefits of cost effective storage and so on for utilizing a records center as do Saffady and Schellenberg. He says that "coordination by the records management officer and the use of specified forms and procedures for the use of the records center will help ensure its success as part of the records program."¹²¹ Mims insists that it is imperative to maintain control over each "carton," through these methods.¹²² Without guidance from the RM officer, departments may hold inactive records longer than necessary and the records center may become a hodge-podge of ill-organized records. Dearstyne recommends that the records center be "in or as near as possible to, the building where most local government employees work."¹²³ Mims recommends that as commercial records centers provide retrieval of requested records within

¹¹⁹ Mims, 55.

¹²⁰ Dearstyne, 65.

¹²¹ Dearstyne, 66.

¹²² Mims, 39.

¹²³ Dearstyne, 69.

24 hours, city and county records centers should match it.¹²⁴ Dearstyne's recommendation of a nearby location helps to ensure that.

Dearstyne wrote at the very beginning of the common "microcomputer" use in the 1980s, but even then he could recognize the changes brought about by that technology. He mentions the idea of the "paperless office" and again, even then, says that such a thing is "a long way off for most local governments."¹²⁵ Even now the arrival of a paperless office is unforeseeable, and possibly won't ever happen. Dearstyne discusses the implication that with machine-readable records a shift needs to happen where the concentration is on the "information contained in the records as well as the records' physical form."¹²⁶ His practical recommendations on choosing computers for an office and preserving computer tapes may be dated, but the concepts he discusses, including software and hardware dependence, remain at the heart of modern computer records management.

A decade later in the mid-1990s, Mims writes that local government "records specialists must become knowledgeable and involved with data processing."¹²⁷ For example, some states require their local governments to participate in the "overall management of information systems process," which includes electronic records and computer systems.¹²⁸ As Mims says, the liability for the city increases without the input of records specialists.¹²⁹ Mims recommends that for records staff with limited computerization responsibility that they ensure the computerization of records management functions, be represented on whatever

¹²⁴ Mims, 37.

¹²⁵ Dearstyne, 92.

¹²⁶ Dearstyne, 93.

¹²⁷ Mims, 122.

¹²⁸ Ibid.

¹²⁹ Ibid.

body approves computer purchases, ensure that retention requirements are "properly programmed" in *all* the government's computer systems, and be certain that computer systems across the local government "fully provide for its responsibility to meet public records requests."¹³⁰ Electronic records are, in my opinion, the most complex issue facing records management professionals and employees to date. The very changeability and expanse of technology and electronic records make specific recommendations next to impossible to make. Experience with computer systems is only going to be an increasing requirement for most jobs as time goes on, but I can see the same issue arising as with having a records manager/coordinator with a records education or background. Even those familiar with computer systems may not have the knowhow to set up electronic records retention. Procedures need to be built in to ordinance or policy about records staff and IT staff working together to ensure proper records retention happens.

The first step in setting up electronic records management systems within the local government is to study the current records system.¹³¹ Following an understanding of how the current non-electronic systems work, each organization must define the system requirements and what it wants from the system.¹³² Mims emphasizes the importance of convincing the IT staff and the upper management staff that records management personnel need to be involved in the "planning and management of both computer data and systems to be sure that these two phases of the computer program are properly handled."¹³³ For example, if they are not involved records objectives may be overlooked and "countless disasters and inefficient use of

¹³⁰ Mims, 122, 123.

¹³¹ Mims, 123.

¹³² Ibid.

¹³³ Ibid.

computers” may arise.¹³⁴ Mims recommends buying records management software rather than developing in house, as long as proper screening of the program takes place before purchase and implementation.¹³⁵ Electronic records contribute an additional level of difficulty to records management, in addition to matters of budget, training of employees, legal matters, and retention and storage of records. For local governments, such as the City of Bellingham, WA, these difficulties call for specialized guidance to ensure success for their critical records programs.

In comparing the ideas presented by Schellenberg, Saffady, Dearstyne, and Mims, several common threads became apparent. The issue of authority, dedicated records staff and storage facilities, proper organization for access, and continuing complications with both backlogs and electronic records are just a few aspects of records management theory that impact how a records management program functions. It was with this theory and potential complications in mind that I evaluated my internship at the City of Bellingham, Washington, to draw useful and practical conclusions regarding local government records management.

¹³⁴ Ibid.

¹³⁵ Mims, 124.

Chapter 2: Case Study: Records Management in the City of Bellingham, Washington

Bellingham, Washington is a medium sized city located about mid-way between Seattle and Vancouver, Canada. Bellingham began as four separate towns (Fairhaven, Sehome, Whatcom/New Whatcom, and Bellingham) that incorporated in 1903 to form the city as it exists today. Bellingham's records program is similar to many other records programs in that it has experienced the “unwanted stepchild” attitude and shifted from department to department. In February of 2011, the program experienced some good luck when it was placed under the purview of the Finance Department, with the finance director as its supervisor.

The records program has undergone a drastic reorganization with the retirement of two of its employees. It originally consisted of a records manager who handled the management of the records program and dealt with public records requests, a records center coordinator who managed the daily business at the records center, and two full-time and one part-time records center clerks to fulfill records requests, and complete accessioning, inventory and destruction. The program was also under the umbrella of the Municipal Court. Upon the retirement of the records manager, that position was eliminated and the records program had come under the management of the records center coordinator. When that employee retired in February of 2011, the program was completely overhauled to reduce costs due to budget cuts. Public records requests were directed to the legal department, inter-city records functions were re-organized under the Finance Department and handled by the records center, and the records center clerks were reduced to just one part-time employee. The benefit of the then-current finance director being put in charge of records was that this particular gentleman insisted on efficiency and

realized that records are important.¹ As such, he contacted Dr. Rand Jimerson with the intent to hire a student intern from the Archives and Records Management (ARM) program of Western Washington University to evaluate the city's records management processes, especially in the Micrographics Department. He ended up hiring me for this task for summer 2011.

My job was primarily to familiarize myself with Washington State record-keeping requirements and investigate the status of the Micrographics Department, but I was also tasked with meeting with the different city departments to discuss their records keeping practices and help with tasks at the records center. When the internship ended in fall of 2011, I was kept on for an additional six months to cover the absence of the regular records center clerk, giving me additional insight into how the City of Bellingham records program functioned.

My task began with learning about the Washington State Records Management Requirements. In Washington State, local government records fall under the purview of the Washington State Archives division under the Secretary of State. They offer archival and records management services to both state government agencies and local government agencies. Within that division is the Local Records Committee (LRC) which is made up of the state archivist, a representative of the state attorney general and a representative of the state auditor. They decide on the retention periods for local government records, and provide a retention schedule for local government agencies to use. In the past the LRC had a process in which local governments would create a retention schedule for records not in the limited state provided schedule. This was a "schedule" submitted on a record by record basis to the LRC for approval. Bellingham's

¹ Since this thesis was started, and my internship completed, the finance director has left the City of Bellingham for a position with the Port of Everett. Despite this, his focus on bringing efficiency to city records has left behind a few employees, particularly the city clerk, being more aware of records and concerned that the records center coordinator gets the support she needs.

records center still has some of these older schedules for reference, but they have all been superseded by the now much more encompassing Local Government Common Records Retention Schedule (CORE) and Local Government General Records Retention Schedule (LGGRS) schedules.² The CORE schedule is for records that are common to all sectors and areas of a local government agency, whereas the LGGRS is divided up into sections relating to specific sectors or departments.

The state archives, as in all areas in the current economic environment, has been forced to make staffing cutbacks. This translated into changing practices and requirements for local governments in an attempt to maintain standards with fewer staff people. For example, when I first started looking into state requirements, they required a local government to file a Destruction after Digitization Authorization (DAD) application form. This was for agencies who wished to scan records into an electronic format and then no longer keep the paper copy. The DAD application was very detailed, requiring the departments to prove they had proper procedures and scanning standards (resolution, format, etc.) to ensure that the records would be available for the entirety of their retention period – which might still be an unknown for long term records. That application process was then eliminated at the beginning of 2012 in favor of the state supplying the minimum requirements that must be met. While this change was made primarily in response to diminished staff able to review DAD applications, it also benefited local governments by making the digitization process easier to manage with their own reduced resources.

² Since the time of my internship, and while I was writing the majority of this thesis, the state has revamped its local government retention schedules, demolishing the LGGRS schedule in favor of sector specific schedules.

Micrographics

As previously mentioned, my primary goal as intern was to ascertain the current status of the Micrographics Department and assess what needed to be done to improve operations. The finance director's impetus for investigating the micrographics function within the city was his receipt of a report from the state in the spring of 2011 detailing the failure of nearly every single back-up roll of microfilm to meet any of the state's quality standards. These failures were typically due to the resolution being too low or unknown, or the density being too light or too dark. The other issue the report revealed was that the last several years' worth of microfilm backups had not been sent to the state archives.

Significant problems plagued the Micrographics Department as it then existed. The Micrographics Department had consisted of a single employee for many years, and from what I have gathered in discussions with this employee and in looking through the very few records (old emails and memos) that were kept,³ there was a combination of different factors that garnered the results reported in the report from Olympia. I got the impression from this employee that she did not receive much guidance or training in the micrographics functions, either when she first started in that position or throughout her years as micrographics technician.

From my conversations with the micrographics technician, I concluded that there had never been proper training on how to achieve the correct resolution and density during filming. The processing companies the film had been sent out to may have also played some part in not

³ These records were all around ten years old. I had assumed these were just leftover records that had never been cleared out of the micrographics room when a previous employee had left and current records were stored elsewhere, but after interviewing the micrographics technician I found that these were the only records for the department. The current micrographics technician had kept no records of converting records to film, of processes, or really of anything.

achieving the proper standards. Until very recently, the film that was sent to Olympia had not been the master, but one of the copies, and this could have caused their test results to be below standards. The practice in the city's Micrographics Department had been to send a copy for backup, and cut most of the master rolls of film into microfiche format to organize by address, which was not what the state requires for security backups. As for the gap in records, the micrographics technician had not been sending anything to Olympia for quite some time, resulting in a backlog held at the city that did not have security backups in case of emergency. For the microfilm and microfiche that were stored in the micrographics room, there was no inventory or indexing and frequently incorrect labeling. This resulted in a confusing arrangement of records, duplicated and missing rolls, and an increased difficulty in identifying rolls for requests. There were also many "stray" piles of microfiche that were scattered around the office, waiting to be checked for accuracy and filed.

Having inventoried the contents of the micrographics room, I knew that there were three main departments I would need to work with in determining the current status of microfilmed records. The records center coordinator told me that she had already received questions regarding the microfilm from the Permit Division of the Fire Department, so I decided to meet with that department first. Their records are long term (life of the building plus six years) retention for essential records. These records had been microfilmed and the paper copy destroyed, until around 2008, when the department decided to halt microfilming as backup. They were in the process of setting up scanners to work with their permitting software, but were not scanning yet and the past several years' worth of records had no backup. The fire marshal had taken charge of managing their microfilm records that year and was not at all happy with microfilm as a medium, which he called "unsustainable." His complaints were that the format was a low quality,

outdated, and a high cost method to store and use these records. Their reader was broken and too costly to fix, and was also only a reader, meaning that for any request regarding his records, he would have to make a trip to city hall to use the reader/printer in the city's Permit Center, which he said makes low quality printouts, especially for the larger format records such as the commercial plans.

The fire marshal had many suggestions for how things should progress from here. He came to Bellingham from the City of Kent, which had undertaken a successful, large scale, city-wide digitization project. I believe that this experience gave him too high expectations of what was possible for Bellingham to accomplish with its current budget constraints. He wanted to discontinue microfilm completely for his department and complete the state's Destruction after Digitization (DAD) approval process to have his records scanned to a digital format and then be able to destroy the paper. He wanted the Planning and Public Works departments to do this also and then have all the records relating to the same address's permits accessible to all three departments within the same system. The fire marshal, like the majority of those dealing with a surplus of paper records, had great ideas but may have been a bit overzealous about the complete switch to "easy" digital technologies. He did not seem to consider fully the problems with stability of many electronic systems and their potential shortcomings for long term retention, in addition to cost of digitization in a tight budget environment.

The Building Services Department also had its older permit files on microfiche. They microfilmed their permit records until about 2000, when they switched to scanning into the electronic permitting system, Tidemark. Their copies of the microfiche were also hit and miss when it came to quality and clarity. Building Services, however, actually used its microfiche frequently, and also often needed to make copies of the microfiche for public records requests

when the format of the small printout they were able to make was unacceptable to the requestor. According to a meeting I had with the Planning Department, when Building Services started scanning its records, they destroyed the paper copy, which was a continuation of the process of microfilming and destroying. The problem with this is that they would have needed a process approval (the DAD approval form) from the state in order to ensure longevity and quality of the scans.

Fire and Building Services were not the only departments dealing with problematic microfilm. The Payroll Department also had some of its payroll registers, which have a 60 year retention, on microfiche, although this was done for a different reason. They have gone through multiple electronic payroll systems over the years, apparently with no control over the changes. The first one produced reports that were printed out to save. The following system which came into use around the end of the 1980s retained much more information. These reports contained 1000+ pages each pay period, which made printing impractical. They have had problems with the IT Department randomly dropping their information off the servers due to space, so in order to maintain the information needed, they had to resort to microfilming and saving the information to CD. For example, they were at one point able to access these records back to 1993, but now they can only access back to 1998. Supposedly, they heard that IT had done something with the 1993-1997 registers, but they cannot locate them anywhere. Their issues with the microfiche included a concern that it was not a legal record copy since it was not in microfilm roll format and also that its quality and printability were inadequate. They did not go through the city's Micrographics Department to have the payroll registers microfilmed, so their quality was higher, but they only had a microfiche reader and were concerned about access and requests. The Payroll Department was unaware of the reader/printer located in the micrographics

office. With their current system, they were again able to print off reports. The department preferred having these remain electronic for searching, etc. (and the requirement from the state is to maintain them electronically) but had to continue to print them because IT continued to drop older copies off the server/system to clear space. They were also under the impression that the paper copy serves as the legal record since IT could theoretically “alter” the electronic copy. The department seems somewhat frustrated with IT for just dropping off their information to clear up space, but there apparently had not been much communication between the two departments on the subject.

In interviewing departments that used the Micrographics Department, I had learned that the quality and cost of the microfilm had led to most of them discontinuing having their records microfilmed. In fact at the time of my internship only the city clerk continued to have a microfilm backup of her records (city ordinances and city council agendas and minutes). Unfortunately, this means that many essential records did not have the security backups they should. From what I can tell, this is most likely the result of weak management of the city’s records in the past by the records managers and a tendency to “just let things go” when they encountered any form of resistance from other departments. Additionally, departments chose to cut the expense of microfilming in favor of scanning or just as a way to reduce their budgets. Based on the problems the departments had encountered with their microfilmed records, I was not surprised that they would have chosen to eliminate this expensive record keeping practice.

General Records Management

My second goal was to meet with the different departments of city government to assess their records management practices. Additionally, I was asked to draw attention to a new email retention policy recently composed and distributed via email by the public records officer in

response to the state's focus on the importance of retaining email as official records and the shortcomings of the "automatic" system put into place by the ITSD Department. This system was a "blanket" program that automatically retained all emails sent by the city for two years, which is the amount of time required by the state for "General Communication" records. The problem with this is that many emails fall under different types of records retentions, for example, project related emails, which need to be held for six years after the project is completed. The email retention policy reminded employees not to count solely on the ITSD system, and that they needed to manage and save their own emails that might fall under a different type of retention.

In concluding my microfilm meetings and moving on to meetings about paper and electronic records and record-keeping practices in the other city departments, I noticed that the farther away the departments were from City Hall, the less knowledge they had about records. There were, of course, exceptions to this, but for the most part, those departments that were located in the Public Works Operations building or other areas of the city, or those whose work involved duties outside the office, were less aware of the specifics of record keeping. As a whole, the city's departments were aware of the need to keep records, but confusion came in when it came to determining what was considered a record and how long to keep them. The majority of the meetings I had were with the divisions of the Public Works Department, as the records center coordinator did not have much interaction with these departments.

Based on my meetings with almost every department in the city, I was able to provide the city finance director with a few overarching ideas about where the city stood as far as records management was concerned, specifically where there were problems or challenges. As a whole, I found the city to be in pretty good shape as far as records were concerned. Luckily, nearly every

department interviewed was aware of the need to keep its records. However, multiple departments lacked the knowledge of what exactly they did or did not need to keep, what the specific requirements were, and the existence of the records center/records center coordinator as a resource. Out of the 27 departments interviewed, 88% of them knew that as a government entity they needed records management, leaving only three departments having no knowledge of this. However, only 70% of departments interviewed knew of the state requirements for records keeping and the existence of the records center, meaning that five departments weren't getting the guidance they needed.

Records Center Staff Authority

From the interviews with the departments and my work with the records center coordinator, I felt that the gaps in departmental knowledge were a result of two main areas of concern. The first was that the city needs to give records staff more authority. The records center coordinator had often felt that she had no authority to get involved with departments that were resistant to her guidance. The main department that this came up with was the Medic One Department. I met with the records person in Medic One after the records center coordinator brought some concerns to me about what they were doing with their records. This department was planning to digitize their records and destroy them without state approval. I contacted the regional records manager for the state archives to double check that Medic One fell under state requirements, which it did, with accommodation for federal requirements due to their medical information. Having such personally identifiable information as medical data in their records makes them fall under very stringent regulations – both from the state and federal government. They are covered by FOIA, Health Insurance Portability and Accountability Act (HIPAA), Department of Social and Health Services (DSHS), Health Care Administration (HCA), and the

state Department of Health. Whichever holds the most stringent requirements takes precedence. The Medic One employee said that pretty much all their records were gathered together and filed as MIRs (medical incident reports) but that they also had financial information. They were moving to a new electronic system which was developed for ambulances, with built in HIPAA compliance and so on. With this new system, they expected to be moving to almost entirely electronic records for the EMTs and fewer of them would be producing paper forms.

As to the concerns the records center coordinator had with their digitization project, I told her that being a public agency producing public records they fall under state requirements, including having Destruction after Digitization approval from the state. Her response was that Medic One's records were not public records but belong to the patients. She said that she has told the records center coordinator this multiple times. She also insisted that her records were approved for destruction under DSHS and HCA and 70.41.190 and 5.46.010 from the RCWs and said multiple sets of auditors have looked and approved how she is caring for her records. She also said she had very stringent checks in place to ensure proper digitization before destroying the paper. RCW 70.41.190 has to do with records retention and preservation for hospitals and details the length of time they are required to retain their records.⁴ RCW 5.46.010 details the usability of copies of originals as evidence and includes a section on ability to destroy originals if a durable and accurate copy is made.⁵ However, at the time, the standards for a copy replacement for an original had to be approved by the state, so her interpretation of the RCWs as a blanket approval was not entirely correct. This employee was very protective of Medic One's records

⁴ "RCW 70.41.190 Medical Records of Patients – Retention and Preservation," n.d., <http://apps.leg.wa.gov/rcw/default.aspx?cite=70.41.190> (9 March 2014).

⁵ "RCW 5.46.010 Copies of business and public records as evidence," n.d., <<http://apps.leg.wa.gov/rcw/default.aspx?cite=5.46.010>> (9 March 2014).

and extremely firm on how they should be managed with no doubts that they were being managed properly. The involvement of many different federal and organizational regulations in the retention of Medic One's records makes this a very complicated situation and calls for cooperation and involvement of the records management staff at the state archives. The records manager at the local branch of the State Archives was involved and sent an email to this employee offering her assistance and clarifying that she did need to follow the state retention requirements, but as of the end of my time with the city records center in spring 2012, she had never gotten a response.

Retention Knowledge and Interaction with the Records Center

Another source for the lack of departmental knowledge can be attributed to the lack of time or assistance that the records center coordinator had for outreach to the departments around the city. The five departments I interviewed that were unaware of the existence of the records center were lost as a result of this lack of time. With the budget cuts and continued reduction of staff, by the time I finished my internship, the records center coordinator was the only staff member left at the records center. This left her very limited time to go out and work with departments and also keep up with normal records center duties, not to mention her inability to work on projects to bring past improper record keeping issues under control and updated. The records center was reaching capacity, and a major clean-up of the existing records on the shelves was required, but there was no staff or time to make that possible. With the issues in budgets, loss of staff, and loss of available staff's time, I found that the records center was more in a state of clutching a bit of driftwood to stay afloat rather than actively staying on top of the flood of records needing management.

Several departments exemplified the idea that knowledge of records retention needs was directly proportional to the amount of exposure to the records center and records center coordinator. While all city departments were aware of the need to keep records, the knowledge of why and how long was lacking in those departments that did not utilize the records center or work with the records center coordinator. These departments typically kept their records “just in case,” rather than because they knew specifically that they needed to.

One of these departments was the Communications division of the Public Works Department. This department takes care of the radios used by dispatch and in police cars, etc. The manager of this division was completely unaware of any state requirements for records or the existence of the records center. I explained to him that anything produced while performing his job/city business was considered a record and needed to be maintained and kept under the guidelines of the state records requirements. Most of this department’s records are in electronic form and despite being unaware of the state’s requirements for keeping records, the department has kept almost everything “just in case.” As far as keeping records for the length of time required, I found this department to be doing fine, but they needed guidance towards disposition of some of their older records that were past their retention.

Demonstrating the positive, most knowledgeable end of the awareness spectrum were the Purchasing, Warehouse, Administration, and Financial sections of the Public Works Department, all under the same department head, although different people manage the records. They all were very aware of how to manage their records according to the state schedule and worked with the records center coordinator often. They were the most prepared offices for their meetings with me and came with their records management information ready. For a few of them, the idea that anything they produced in the course of doing their job being a “record” seemed new, but they

all were familiar with the need to keep records and how to use the records center. Most of them actually only kept copies for themselves, as original finance records were kept in the Finance Department.

Occupying the middle ground of not knowing how to manage records but wanting to do better was the Environmental Resources division. The issue with this department was that they had a high employee turnover. They would go through many interns and volunteers (i.e. AmeriCorps, etc.) and even their regular, paid employees moved around frequently. Each of these workers kept his or her own files in a personal way and after she or he left, the remaining workers were often unable to find what they had been working on. Due to this, the department had recently met to discuss their records before I had even requested a meeting. They talked about what was important to keep and raised the question of how to know, revealing that they had never been aware of the state retention guidelines or the existence of the records center to turn to for help. They also started to discuss a restructuring of how they store records to make it more centralized. They wanted to have a system that all new employees for the department would be taught to use. The department used to be located within Engineering, but since they moved into their own offices, they no longer received guidance or instruction on records management from Engineering. With no guidance, they have kept everything and needed guidance on what they can safely destroy and how to manage what they keep.

The department that caused the greatest concerns was the Surface and Stormwater Division of Public Works. This department did not have a good handle on its records. At the time of the interview they had recently moved from the City Hall Public Works Engineering/Administration offices over to the Operations facility. The department manager said that in Engineering they had a centralized filing system that they did not have in Operations, so

they just didn't manage their records now. Most of the department's records were kept and disposed of piecemeal by individuals when they chose to. The manager kept everything because he thought it was important to, and admitted to having saved things that other employees were destroying (including copies) "just in case." They did not send things to records center. When asked what records/documents the department produced, the manager had trouble coming up with record types. The manager was able to tell me about their project files, which they sent to be stored in Engineering. It appeared that only their project files were maintained and managed, and that is only because they were filed in Engineering. Both the manager and employees were unaware of the existence of the records center and the state records retention schedule.

I found that awareness and use of the records center and state retention schedules provoked a much more active approach to records management among the departments. The administrative/financial sections of the Public Works Department demonstrated this with their preparation and organization during their interview. The Engineering and Planning departments, which work extensively with the records center coordinator, demonstrated this even more strongly.

The Engineering division of Public Works was one of the city departments with the most records, both active and at the records center. The "physical bulk" of Engineering's records were their project files. They had around thirty file cabinets of active project files. They also had a room in the city hall basement they had deemed "the repository" for boxes of "completed" projects that stayed there for a year after completion for bills coming in, etc. These were not accessed on a regular basis and were eventually transferred to the records center. They also had permit related files and were working on getting those scanned into the Tidemark permitting system. Engineering's record contact was very dedicated to getting the department's massive

amount of records into shape. She was of the “purge when you can” mentality, which was fantastic for someone in charge of a department’s records, particularly one with such a massive records collection. She claimed her director was of the “keep everything” mentality, but she had been slowly making some progress towards getting some eligible records destroyed. She was very knowledgeable about the records in her department. Engineering staff had deemed project files permanent. The state requirement for project files is life of the project plus six years, but since the projects that Engineering works on are usually permanent and public owned (i.e. buildings, roads, bridges, etc.), I believe this city-assigned retention is appropriate. The records contact was very amenable to a suggestion of weeding out some of the bulk from the old project files that would not be necessary to keep permanently. Of course this would be an enormous project that would take considerable time and extra staff, so it probably was not very feasible at that time. The records center coordinator has had a significant amount of trouble in dealing with past accessions of Engineering’s records. Previous Engineering records contacts had not put much effort into organizing the records before they sent them to the records center and, as a result, records requests could become quite complicated. Different projects were located in several different shelf locations, which led to time consuming research in regards to requests. The fact that the records contact was amenable to the attempt to get things condensed and better organized was an important step.

The records contact in the Planning Department was also very active in trying to reorganize the department’s record keeping. Planning produced a massive amount of records (similar to Engineering) and this employee was determined to streamline their processes. Also similar to Engineering was the sloppiness of old accessions of Planning's records into the records center. Accessions of 100+ unorganized boxes were sent to the records center during a

department remodel and never taken back or fixed. The current records contact worked frequently with the records center coordinator to organize and purge these old accessions in an attempt to condense Planning's records stored there. She was very dedicated to transferring records to the state archives for permanent retention or getting unnecessary records at the end of their retention on a destruction notice. She called a meeting with Planning, the records center coordinator, the public records officer in Legal, and ITSD to discuss digitization of Planning's records and a possible application for a DAD approval (Destruction after Digitization) from the state, as I will discuss in more detail below.

The Post Point Wastewater Treatment Plant and Lab straddled the divide between these two knowledge bases. This department was not aware of the state's retention schedule, but did use the records center and applied retention to its records based on other requirements. Its records primarily related to the operations of the plant and lab testing, but the manager pointed out that there had been legal situations where its records were used. They had been keeping their records, but had never heard of the state's retention schedule. They did deal directly with the state with some of their records, but were not aware of the extent to which they had to maintain their files and documents. The lab manager was primarily concerned that my intent was to take away all the records. The lab needed to keep its records at the lab for federal audits and requirements for three to five years. They were subject to surprise inspections where they were required to produce all original records for any day during these required periods. The lab manager had also not seen a state retention schedule but was aware of having to keep their records due to their federal and use requirements.

Level of Staff with Records Management Responsibilities

Another reason behind the variance in knowledge among departments was the difference in assignment of records management duties through the different departments. This is one that I do not think was as major as the issues involving the records center, but still important enough to not be called a “minor” area of concern. Typically, the departments that had more permanent, higher level staff in charge of records management (i.e. the department head/manager or administrative assistant) had a better grasp on records management requirements and had better practices. For example, this was demonstrated by the Public Works Purchasing, Warehouse, and Financial divisions where the department head took an active role in making sure records were properly managed. Engineering, Planning, and the Finance Department also exemplified this, as the administrative secretaries and city clerk (who were essentially the right hands of the actual department heads) were actively working with the records center coordinator to make sure records were being maintained correctly. The departments that had high employee turnover or had a lower level employee working on recordkeeping were the ones where record requirements slipped through the cracks, for example the Environmental Resources division.

Electronic Records

One of the most significant issues I found in my interviews was that of electronic records, specifically regarding their retention and storage. There were two primary departments demonstrating the potential issues with older format electronic records. In the Post Point Wastewater Treatment plant, most of the records have been produced electronically. Older digital tapes from around ten years ago have been lost and the information is no longer available. The other example was the Water Distribution Department. They had a stack of old floppy discs stashed under a desk because none of the department’s computers had a floppy drive with which

to access the information on them. The records center coordinator ended up accessioning the discs into the records center and contacted the ITSD Department to attempt to get the information off them. Fortunately, given the floppy discs formatting, the ITSD Department was able to recover the records stored on them.

Especially in the Public Works Operations Department, most of the different divisions' records were electronic, for example, work orders that were stored in the Hansen system and permit records stored in Tidemark system. One of the Public Works departments where they almost completely worked in an electronic medium was the Data Services division. Anything that the crews working in the field produced on paper would be entered into a computer database for the complete record, although they did save the paper forms for ten years, out of concern as to which was the actual record. According to the state, as long as they used the electronic record as their primary record and had entered everything off the paper form into the electronic database, the electronic version would be their primary record and they could treat the paper as copies. As a whole, this division was aware of record keeping requirements and just needed format clarification.

With the surge in email communication and electronically produced records, the storage issue for the city was significant, partly due to the lack of available storage for electronic records. In order to properly follow state requirements, IT needed to provide proper network storage so people could manage their electronic records properly. Their "2 year" blanket email retention did not provide enough protection for emails that fit under other records series, and it did not save them in a usable way. Emails requesting that city staff purge their electronic files in order to free up server space risked employees deleting files that need to be retained for a particular time period. Several departments have had problems getting this notice from ITSD. For example, the

Communications division of the Public Works Department saved all its emails, despite not having read the email retention policy that was sent out⁶, to the point where in the past ITSD has had to contact the department manager asking him to clear out his email to free up server space, although he typically ignored them and continued to keep all his emails anyway.

The other department that was running into this problem frequently was a one person division in the Police Department. At the time of my internship, this division had between 130 and 200 open or active cases, which created both paper records and electronic records. A red flag was raised when she said she printed out her emails to include in her paper files, since legally emails must be saved in their original, electronic format. The reason she did this, however, was because she had been one of the employees who received the “clean out your email, it’s too full” notices from IT. She had even been notified to delete other electronic files in her network drive, which happened to be still active files. This division had a massive amount of files, which would translate to a massive amount of emails that can span years; she gave an estimate of up to 600 case files. This would require a significant amount of storage space, for at least six years and often longer since case files can take several years to complete.

The other "hot topic" issue that arose with electronic records was the desire to digitize. This was touched on earlier in the micrographics section, with departments preferring the ease of scanning to microfilm. As mentioned above, Planning and Building Services were seeking to digitize their records, and the Planning records contact called a meeting involving the public records officer, the head of ITSD and ITSD staff, the records center coordinator, and me.

According to the Planning records contact, Building Services (a division of Planning located

⁶ This became a common finding as my interviews progressed. This is a concern that an important piece of information gets lost in the flood of daily emails. Apparently when a new procedure such as this is established, more than an email needs to happen to make sure that people are aware. This of course requires staff and staff time.

within the Permit Center) had been scanning for about seven years but had destroyed the paper versions of the record afterward without authorization. The records contact was very concerned about this, but, while obviously not ideal, it was not crippling since the records did exist and were accessible. Like other departments, Planning and Building Services had been using Tidemark, but the records contact and ITSD director said that it was an “end of life” system and therefore not viable for long-term. The records contact for Planning asked if there was the possibility of getting a city-wide electronic documents system and the ITSD director said that they had been looking into an enterprise wide system, as multiple departments have need of such a system and have contacted ITSD about it. However, such a system was not in the 2012 budget, but possibly the 2013. The ITSD director said such a system is a significant expense, up to half a million dollars, which led me to believe that this would consistently be put on the back burner.⁷

This led into discussion of the DAD process, and the impression I got from the ITSD director was that this is a complicated, long term process. I did make multiple mentions of contacting the local office of the state archives for help, and put in whatever knowledge I had about the DAD process (i.e. needing a formal policy and procedure in place and so on). I also suggested using microfilm back-ups for their long term records and told them about the state’s microfilming from digital services. The records contact for planning suggested that, with the plans for the Tidemark system going away, they should wait to go through the DAD process. This became a moot point, however, as a few weeks after this meeting, the state announced that it was doing away with the DAD process and instead moving to a system where they would provide the minimum requirements for digitization and it would be up to the individual agencies to ensure they were meeting those requirements.

⁷ As far as I am aware, this did not happen in the 2013 budget either, although research into systems did continue.

The main problem I found with electronic records in the City of Bellingham was that the ITSD Department is working under the constraints of limited budgets and staff. Records management software is expensive, electronic storage is expensive, and they also have to keep other technology updated. It appeared to me that they have found the best solution to a difficult (and once again, budget related) problem of electronic records and email retention, even though it is far from ideal.

Long Term Records Retention

As a local government, the City of Bellingham produced many long-term to permanent retention records, which contributed to the issues of storage and management. These included the aforementioned records of the Engineering and Planning departments. Another department that had such records was Bayview Cemetery. This department had both electronic (on the cemetery system Nexus) and paper records for the cemetery. Nearly all of the records (back to the founding of the cemetery) were permanent and cemetery employees needed access to all of them for any sort of transaction for the cemetery. The records involved financial records used for selling plots and tracing ownership. They input the historical grave information into Nexus, and they had old section cards and the log books which were the original form of record keeping. There is overlap, but the manager believed that since everything was hand copied and hand entered into the Nexus system, there was a high chance of errors, so they keep all three forms of the records to prevent double selling of graves and so on. This manager was very dedicated to her records, not only because she needed them on a regular basis but also because she had a genuine enthusiasm for her work and the records.

The original section books from when the cemetery was first founded were still in decent enough shape, but should end up going to the state archives so they could be properly stored and

preserved. From the records center coordinator, I knew that an attempt to get her to archive things had been met with resistance, so a delicate touch would be necessary. The manager was working on getting all the information contained in these records entered into her computer system. Once it is, I think that she needs to be re-approached about transferring the delicate, permanent, and historical records to the archives, presented from the standpoint of providing proper environment to protect the physical record more than a “you don’t need these anymore” perspective. If she is not continuing to work on getting this information entered, she should probably be encouraged to have a “double check” in the computer project in order to allow for the eventual preservation of the log books through transfer to the archives.

Importance of In-person Interaction

Over the course of my interviews, I encountered an issue that I did not expect: discussing records retention is really better done in person. The prime example of this was my interview with the Wastewater Collection Division manager. The interview was done over the phone, and ended up being the only meeting conducted that way as it was not very enlightening for either of us. The attempt to explain that anything the department produced in the course of performing their job counted as a record did not seem to come across as clearly as in my other meetings. The manager was unaware of the state retention schedule and had never used the records center. The records he was able to think of were mostly electronic and managed by the Data Services division in the Hansen work order systems or other databases. This no doubt had contributed to his lack of knowledge of records management procedures and why he was unclear about the existence of his department’s records. It was difficult to get a feel for the department over the phone, and I think that the general idea of a phone conversation was to get it over with quickly, whereas with the in person meetings I was able to really get into details.

Another example of the importance of in person meetings came up in regard to the email that went out city wide regarding email retention. My meeting with the Water Treatment Plant manager went well as he was very well aware of his records and what the requirements were for keeping them. His confusion and concern arose when the discussion of email retention came up. He had a lack of clarity as to what each email would be counted as, and I had to keep referring them to the records center coordinator or the public records officer for future clarification or questions. This suggested to me that an in person approach was best when introducing new and potentially confusing records procedures.

Summary

As a whole, the City of Bellingham, WA was only meeting the bare minimum requirements with regards to its records management given its present budget and staffing situation. While there was significant room for improvement and despite there being some concerns uncovered during my interviews, as a whole the city employees were already aware of the need to keep and maintain their department's records, which was good. The concern was keeping records too long rather than not at all or not long enough. The records center coordinator was very dedicated to following the state requirements for records retention and getting the records center as organized and smoothly run as possible given her limited staff. The departments producing the bulk of long term records both had employees in charge of records who were determined to get their records under control and usably organized. Public records requests were handled efficiently and legally by the public records officer in the City Attorney's Office. The IT department was working on developing options for managing electronic records, and even though the budget may not have allowed immediate implementation, at least they were

actively working on it. The base for a good and successful records management program is there, but changes definitely need to be made in order to bring it up to the level at which it should be.

By the end of my internship, I was able to establish several key points and perspectives. With these perspectives and concerns, I took a new look at the existing records management theory from several different authors, with the goal of trying to make some inferences about what the current financial and political situation in local governments would mean for existing theory.

Chapter 3: What Can Be Inferred From the City of Bellingham?

This chapter will analyze existing records management theory using the City of Bellingham case study in order to make inferences about theory's current applicability and practicality in regards to local government and offer possible suggestions for improvement, both with the city and in areas of the records management literature.

Centralizing Records Management Procedures

As Schellenberg said: “little is done within government that is not made a matter of record.”¹ This is echoed today with the view presented to local governments such as the City of Bellingham: anything produced in the course of performing your job duties is considered a record. Schellenberg's concern with the production of so many records was that each agency office adopted its own methods of managing those records and there was little to no uniformity across the board as to how they managed those records. I found that this is still an issue with the different departments within the City of Bellingham. Especially for local governments that are mid to large sized, with departments spread out over different areas of a city or county, duplication of records leads to each department keeping things that may not actually need to be kept. Many of the departments, especially those in the Public Works departments also had their own filing systems, ideas about what records were, and level of employee assigned to handle their records. The solution to this problem is to appoint a city records manager, or specifically in the City of Bellingham's case, a records center coordinator. However, despite the existence of such a position in Bellingham, there were still departments that had no interaction with the records center coordinator or the records center

¹ T.R. Schellenberg, *Modern Archives: Principles and Techniques* (Chicago: Society of American Archivists, 2003), 38.

and did not have an established records management procedure. My interviews with the departments helped to start correcting this, as it brought the records center to the attention of the departments and those departments to the attention of the records center coordinator.

Authority

Authority is a crucial component to records management. Schellenberg recommends that the centralized records management staff should have *authority* in the disposition of records, that there needs to be a separate records management staff that guides individual agencies in economical and efficient records production and management. This issue was precisely the problem that I found within the City of Bellingham. The records center coordinator, while under the direction of the city finance director (a high level city official), does not have the authority needed to really have influence over records decisions. Yes, the city must follow state requirements, but the records center coordinator does not have power to influence records procedures within departments. She can only recommend and leave it to departments to do what they will.

I conclude that the records center should properly be located under the purview of the executive department in order to have top-down authority and be able to use the mayor's authority to influence records procedures and policy. Authority is one of the earliest professional recommendations, and it holds up as still crucial to a records program's success. A fight for records center authority and proper placement within an agency is still critical to get things accomplished. However, as with almost everything related to records management, this is easier said than done, especially in a local government, where a records program is put wherever there is some form of budget for it.

Along these same lines, Dearstyne recommends getting an ordinance set up to give authority and outline the records program's functions. Luckily, the City of Bellingham has in place an ordinance regarding records management, although it is dated and in severe need of updating. This appears to be a common problem among local governments with an established records program. It demonstrates that the records program needs to be active and a "living" program. It's not a "set it and forget it" function of government; the changing types and formats of records in addition to the evolving functions of government require that ordinances regarding the records program need to evolve with them. In Bellingham's case, the city clerk began working with the records center coordinator to start updating the ordinance and official city procedures, although they had not completed that task by the end of my internship.

Mims believes that a key function of a local government records manager is in developing her or his "records management writing."² Mims argues that having strong writing can be a powerful tool for a record manager to ensure program success. One of my recommendations to the City of Bellingham was to develop a records procedures manual to provide to the records contact person for each department, in order that consistent practices and guidelines will be used across the city. The purpose of this manual is to ensure that the audience is not "turned off" from paying attention to records management communications. However, despite being important and informational, this issue still arose with city-wide email retention. Most employees still did not read the procedure email. I recommend that a better system would be to send it to the department heads or secretaries with the instructions

² Julian Mims, *Records Management: A Practical Guide for Cities and Counties*, (Washington D.C.: International City/County Management Association, 1996), 154.

to distribute it to their employees. While this is more of a babysitting approach, this is obviously required if there is an important policy that no one reads. Clarity of writing is also crucial, in that email retention is a very confusing issue, and while the policy was laid out well, departments such as the Water Treatment Plant were more confused by it than informed.

Records Inventories

Saffady recommends a records inventory, for the ultimate purpose of making retention schedules.³ Even when a retention schedule is provided, a records inventory can be extremely useful. For example, since the City of Bellingham's retention schedule is provided by the state, they do not need to inventory records and write their own, but interviewing departments about what records they produced (a sort of mini-inventory) revealed to the records contact what they should be managing. This firmly underscores my earlier ideas about the importance of a periodic inventory to ensure that certain departments are not slipping through the cracks.

Specialized Educated Employee

Due to potential difficulties in identifying records and assigning retention, Schellenberg calls for a dedicated records manager, using the word "specialized" to describe their skills and background. Despite being under the purview of the Washington State Archives, which does hire specialized and educated archivists and records managers, I agree with Schellenberg that having an employee with proper records background is crucial to the ultimate success of a records program for any local government in Washington State. The

³ William Saffady, *Records and Information Management: Fundamentals of Professional Practice* (Lenexa, KS: ARMA International, 2004), 23.

records center coordinator for the City of Bellingham has done an amazing job of seeking out information and references available from the state, but there is still a gap in knowledge for which a records background could provide invaluable assistance. However, while I think that hiring an educated records manager is best, based on my findings at the City of Bellingham, it is not always attainable. Local governments may not have the budget or capability of hiring educated records managers. Dearstyne's warning supports me on this. The current records center coordinator at the City of Bellingham has an accounting background and no education in records management principles. I do not see this changing in the near future (at least until she retires), and it would require a lengthy job audit process to change the requirements for this position. Bellingham is a mid-sized city; for smaller cities where there is even less of a dedicated staff member option, an existing job might have to be expanded to include records management duties.

Expanding on this idea, certain aspects of records management do not necessarily have to be located under the purview of the records manager, or in the case of Bellingham, the records center coordinator. According to Saffady, one of a records manager's crucial duties is to identify records laws that apply to their organization, in order to prevent unlawful disposal of records and possible fines.⁴ As I stated earlier, this is where I find Saffady's recommendations to be overreaching a bit. While it is important for a records manager to be aware of the laws regarding government records, the complexity of said laws and the unlikelihood of an employee being hired with an extensive records background could make this very difficult. I believe that this aspect of local government records management, when needed, should be placed under the purview of the local government's legal department. This

⁴ Saffady, 54.

is the situation in the City of Bellingham. Its records program is split into two portions: the public records officer and the records center. The public records officer is located within the City Attorney's Office, a choice I found particularly effective with the strict legal requirements necessary for public records. Who better to decipher the legal jargon in the policies put out by the state archives or the requirements in a Public Records Act request than an attorney? For example, the law in Washington states that "Each agency, in accordance with published rules, shall make available for public inspection and copying all public records, unless the record falls within the specific exemptions...or other statute which exempts or prohibits disclosure of specific information or records."⁵ Evaluating whether the records requested fall under any exemptions detailed in the 28 sections of the RCW dedicated to exemptions can be complicated, as the exemption descriptions are written in legal language and change as court cases occur. The requirement that the agency provide a response within five business days further complicates these type of requests.⁶ The complexity of deciphering whether an exemption is applicable to a particular request makes an attorney very appropriate, and possibly the best possible choice, for a public records officer.

The City of Bellingham's public records officer is very keen on his position, actively working to get the city up to standards and working hard to ensure that the city employees know what is expected of them. He makes it a point to sit in on new employee training in order to catch employees when they first come in to the city and let them know the records

⁵ "RCW 42.56.070 Documents and indexes to be made public," n.d., <http://apps.leg.wa.gov/rcw/default.aspx?cite=42.56&full=true> (13 June 2014).

⁶ "RCW 42.56.520 Prompt responses required," n.d., <http://apps.leg.wa.gov/rcw/default.aspx?cite=42.56&full=true> (13 June 2014).

requirements they will be facing, and that what they produce at the city is not a personal record but one that can be made very public. Another reason that I am impressed with splitting the Public Records requests to another department is that the records center coordinator would have no time to fulfill these requests. This could be a valuable model for other local governments in order to ensure the accuracy of law based decisions.

Laws also determine which records are admissible in court cases. Records managers are entrusted to ensure that a record is authentic when presented in court, and this is especially important with electronic records. Again, this implies that every records management program has a highly specialized person in charge. I think that the recommendation should be to encourage continued cooperation among the records manager, legal department and the IT staff of the organization, who would have the technical savvy to implement the records manager's records requirement recommendations. Saffady describes the concerns of authenticity relating to electronic records – how the ease of use, altering, storing, and most especially deleting gives an air of unreliability to computer created records.⁷ An IT employee would be able to provide technical evidence of authenticity that a records employee may not have, as is the case with the City of Bellingham, and possibly other smaller local government agencies where the budget prohibits hiring a certified records manager.

Microfilm

My main reason for being hired by the City of Bellingham was to evaluate their Micrographics Department. The city emphasized microfilm as a valuable tool when done

⁷ Saffady, 61.

correctly. All but one of the departments had stopped utilizing this valuable tool for their long term records due to the expense and low quality of the microfilm being produced over the past fifteen years or so. I think that the focus is now so heavily on digitization that this potential space saving method of retention for long term to permanent records is being forgotten and overlooked, especially considering the computer output microfilm that can be used for the unstable electronic records retention. With the preference for digitization and the cost of microfilming records, I recommended that the city utilize the services offered by the State Archives in Olympia for their microfilming rather than do their microfilming in house. By the end of my internship, the city had eliminated the micrographics technician position and converted the microfilm room to a microfilm storage and research room. The only department with plans to continue microfilming records was the City Clerk Office, which chose to send city ordinances and resolutions to Olympia for microfilming. The rest of the departments chose to go forward with digitization and scanning.

Records Center

One of the key features of many records program is the records center. Saffady encourages including instructions for transferring records to the records center as part of a retention schedule. Dearstyne recommends that the records center be as close as possible to the requesting entity, which makes sense for ease of transport of records and later records requests. Luckily, the City of Bellingham has an operations facility where the records center can be located in a secure, city-owned warehouse type setting. If this was not available, there is no other place the records could be kept, emphasizing the necessity that Saffady outlines for inexpensive off-site storage of inactive records still needing to be retained.

Mims recommends that as commercial records centers provide retrieval of requested records within 24 hours, city and county records centers should match it.⁸ Having such a quick turnaround on records requests would ensure that departments are comfortable storing their records there. In working with the records center coordinator, departments typically request the more recent records rather than the older ones and this is why I recommend working to ensure current records are accessioned properly. While requests do come in for the older, less organized records, having the majority of requests fulfilled without having to do research into accessions enables a smooth request process. I also found that departments tended to be sending records that were not truly inactive in an effort to free up office space and then needed to frequently request them. The records center coordinator had to frequently remind departments of the “inactive records only rule.” The City of Bellingham’s records center, as mentioned, is located on city-owned property. The records center coordinator works hard to ensure that requests are fulfilled same day. The practice of using standardized forms and accessioning procedures ensures that even with limited staff the records center is able to be fully functioning.

One of the more important, yet easily-overlooked, aspects of a long term records storage area is environmental controls. Records require certain conditions in order to be preserved properly. Saffady describes the conditions, such as heat, exposure to light, and high humidity, that can accelerate the degradation of records. These environmental controls are where the knowledge of someone without records education might fall short. For example, the City of Bellingham records center had a humidity control unit that was not in use. The records center coordinator had no idea what it was for or that there was an ideal

⁸ Mims, 37.

temperature and humidity control level for storing records. The records center has multiple windows, some of which are in the stacks, and the blinds covering them are usually open to let in the light because the records center coordinator likes having the natural light. Plans and maps are stored right next to windows with no coverings. Emphasis on getting records center buildings set up properly for local governments is essential, and I agree with Saffady dedicating a significant portion of his text to outlining proper requirements.

Another key function of a records center is being service based. It exists for the agency's departments to store their inactive records and to provide those records upon request. The key phrase here is *inactive records*. Frequent requests of the same record mean that the record should not have been transferred. There were a few city departments that had frequent records requests, sometimes of the same items, which demonstrates that emphasizing the "inactive" qualifier is important and necessary. Saffady also emphasizes that the departments must properly prepare the records for transfer; that it is not up to the records center to do the accurate packing and labeling of records. This has only started happening recently with the City of Bellingham records center. Older accessions were just thrown into boxes and sent over to the records center in such large quantities that the records center staff just had to assign locations to them and put them on the shelf without properly accessioning them. While the current records center coordinator works extensively with these departments who did this in the past to prevent this unfortunate practice from continuing, the past accessions form a large backlog of projects to work on. This is why I disagree with Dearstyne on getting caught up on your backlog first. With the limited staff at the City of Bellingham records center, the records center coordinator has to make the choice between properly processing new records that come in to the records center so they can be retained

and used by the departments for records requests or working on previous accessions that were improperly accessioned into the records center. Since the old accessions are already on the shelf and out of the way, even though they might not be as readily available for research, the records center coordinator focuses on preventing a buildup of unprocessed boxes. When extra help is available, older accessions are organized or updated, which I would argue makes the most sense.

Vital Records

Local governments' vital records are those essential to the successful continuation of daily business of the government. States such as Washington provide information for their local governments as to which of their records are considered "vital records," and Washington recommends storing a microfilm backup of those records with their offices in Olympia. For the City of Bellingham, most of what would be considered their vital records are not backed up, and I would hazard a guess that with the cost of microfilming, this would be a common finding across the board. The payroll records that I worked on with Human Resources would be considered vital records, and the second copy ended up going to Olympia, although I don't believe any of the more current records have been backed up that way. Despite being called "vital records" I would imagine that vital records back up is low on the priority list for many organizations battling other records issues. Bellingham needs to create a policy requiring that staff identify their vital records and let the records center coordinator know so she can work with them on ensuring they are backed up properly. The ITSD department did confirm that the City has an agreement with Spokane where they back up each other's servers, but this only covers electronic records. It also means that the entirety of the city's electronic records are backed up, which would cause delays in resuming

operations in the case of an emergency or disaster. However, they are in line with the State Archives' requirements on having this server backup in place. The city does need to establish better policies for microfilm backups in Olympia for their existing paper vital records, and even consider microfilming some of the electronic records in case technology is not available in the event of a disaster.

“The Myth of the Paperless Office”⁹

Despite the widespread daily use of computers by almost every employee in city government, the eventual "paperless office" that Dearstyne predicted in the 1980s is still not happening anytime soon. The majority of each employee's day is spent performing their tasks in an electronic medium, but nearly every employee I interviewed mentioned that they still create and use paper records. The records center still receives boxes full of paper records. This supports the findings of Abigail J Sellen and Richard H.R. Harper in their studies on offices attempting to go paperless. They found that when offices attempted to go paperless, success ranged from “dismal failure to mild reduction.”¹⁰ They found, as did I, that paper is not going away, but is being used in conjunction with electronic mediums. Workers use both, for each has their own benefits. Local governments need to focus on managing the increasing amount of electronic records, not on the elimination of paper records.

As I discussed above, electronic records are the most complex issue facing records management professionals and employees to date. While I found no sign of Bellingham being anywhere close to becoming paperless, the challenges of storage and proper retention

⁹ Abigail J. Sellen and Richard H.R. Harper, *The Myth of the Paperless Office* (Cambridge, MA: The MIT Press, 2003).

¹⁰ Sellen and Harper, 12.

brought about by increasing electronic records were forefront, especially with the IT staff. As Mims recommends, records staff need to be involved in the process of electronic records keeping. Per his recommendation, this involvement needs to be in selecting an existing records management software rather than developing in house. At the end of my internship, Bellingham IT staff were in the process of reviewing record management software for suitability and the best fit, although they had no firm plans as to whether they would be able to purchase it for the following year, due, once again, to budget concerns. The City of Bellingham needs to make electronic recordkeeping a priority, especially if they intend to pursue converting more of their processes to "paperless" ones. The records center coordinator needs to work with IT to ensure that whatever system they choose retains records for the proper amount of time.

Conclusions

My time working with the City of Bellingham did much to confirm the ideas presented by the leading authorities on records management. The importance of clear records management principles, records retention, file and document management, and storage of records to enhance long term use for them is clearer than ever. However, it also served to point out that many of the recommendations are only achievable in a best case scenario situation. Most local governments, and even the federal government and businesses, are most definitely not in a best case scenario right now. Even the bare minimum recommendations can be seen as a stretch for many organizations right now. The main limitation I see to properly implementing all recommended practices and theory comes down to what I find is the root of most problems: money.

Budget constraints exist across the board in all organizations, with too many departments fighting over an extremely limited resource. Lack of funds leads to limited facilities and resources and even more importantly for being able to be thorough records managers, staff. As staff are either let go or leave, their positions are not filled and their duties are absorbed by remaining staff. In situations like these, records departments, if anything like Bellingham, are the first to lose crucial staff members. This limits their ability to be involved with departments on an outreach, or even support, basis. It limits their ability to keep up with current incoming records, much less be able to go back for records inventory or clean-up projects. Over the course of my internship, I saw the records center go from a staff of two down to one, and an efficient records center fell behind. For Bellingham, a perfect solution to this problem would be to utilize the Archives and Records Management program at Western and hire students as records center interns. This would benefit the city by being able to hire students on a temporary basis, which would be more cost effective than a permanent, full time employee. It would be equally beneficial to the students by giving them practical, real world experience. Until additional staff or interns are hired, city-wide cooperation is required to keep records properly filed and organized at the office level in order to be able to find and provide records when needed both while active and once inactive at the records center.

While I did not end up finding any theory that would be considered incorrect, I did find that most would be difficult to achieve under current economic situation for local governments. The literature could focus less on starting a records program from scratch and more on what to do with an existing program that has had to tighten its belt. I believe that we might have enough theory out there, what is needed is detailed, practical guides for local

government records employees. Guidelines on how to work within the constraints of a government environment, such as lobbying upper level officials to increase records support is needed. Direction on how to get the citizens of the city or county involved would be helpful, such as petitions or encouraging concerned citizens to present a united front to city council. In a local government such as the City of Bellingham, lobbying by an employee does not always have the same effect as lobbying by the public, and records employees may not be aware of that. Specialized advice on how to work within tight budgets and resources for staff stretched over too many job positions would be invaluable to ensure that the crucial records that a local government produces and provides to the public are available and useable.

The City of Bellingham is not where it should be to have a properly functioning records program that meet proper recordkeeping standards. They have fallen into the trap of cutting records management functions when they had to start cutting the budget. With as important and potentially costly as records management is, the city should have kept money for it. Rather than choosing to fill only upper level positions or creating new upper level positions in the Finance department, they should have reserved money to keep the records center properly staffed. On the IT side of things, rather than implementing a new cashiering system (which required one of the new upper level employees to get set up) they should have put the focus on a city-wide electronic records system. While the records center coordinator should not be totally exempt from having to make cutbacks, it should not be cut back as far as it has been. Changes need to be made to get Bellingham back on the right track for proper records management.

One of the recommendations to get Bellingham to where it should be, and probably one of the most important ones is to provide the records center coordinator with more

authority to create changes in records management procedures. Furthermore, she would have influence behind her suggestions to departments. To assist in this, the records program should be relocated to the Mayor's Office. Another part could come from creating a general records management policy/procedure for the city. Bellingham needs to rewrite, update, or eliminate the outdated and irrelevant records related policies where applicable. It would be helpful to include in the general policy a directive to have each of the different departments create its own, department specific procedure tailored to their particular types of records.

To minimize the lack of knowledge in the different departments, Bellingham should make some basic records management training part of the new hire information required for each new city employee. An additional step to this would be to have some sort of annual or biennial review for all employees as a refresher or to introduce new or updated information. This requires the records center coordinator to be freed up to have the crucial in-person interaction with new employees and departments in order to help problem solve records management issues.

With the increase in digitally created records, particularly email, the public records officer, records center coordinator, and IT must collaborate on implementing electronic records management, both at the employee level and hopefully with an electronic records management system. The city needs to make acquiring an electronic records management system a priority. With departments choosing scanning over microfilming and the push for going paperless in as many areas as possible, a system to manage the increasing amount of electronic records is crucial to have a properly functioning and legal records program. Without one, the city is opened up to potential costly lawsuits from not being able to follow public records act laws in a timely or complete manner. Until a system is in place, IT must be

provided with ample server space so that they do not have to keep asking employees to clear out their email and network drives, risking the deletion of records that are still in their retention period.

Most importantly, with the size of the city and the amount of records it produces that are open to public disclosure requests and have long term to permanent retentions, the City of Bellingham needs to retain a full-time records manager/coordinator and provide at least another full-time records center assistant. As mentioned above, the city should take advantage of the Archives and Records Management program at Western and hire one or two part-time student interns to fulfill this role. The city's departments and the public will need to access the permanent paper records until the city ceases to exist. A full time records center coordinator is necessary to check records out to departments for their own use and for public records requests, to accession the paper records that will still inevitably be produced, to help departments with their records management, and to properly manage the destruction of records. As more records do become digitized or are created digitally, a records center coordinator will still be necessary to help manage the same things as for paper records. In addition, when the current records center coordinator retires, the city should reclassify the position to become a records manager and require a records management background. This way someone with the applicable knowledge and education can be in the position and might be able to ensure better procedures are established.

This case study demonstrates how easy it is for a records program to be overlooked and allowed to just skate by all under the excuse of budget cuts. It reveals how easy it is for upper level officials to ignore the needs of a records program because nothing bad has happened yet. While I would not necessarily wish a costly lawsuit on Bellingham, perhaps

one would finally draw attention to the need to make further improvements so its records program is not operating at a bare minimum. This case study emphasizes the need in the literature for practical solutions for local government employees telling them how to overcome budget constraints, gain authority to influence their fellow employees, and boost the budget and staff allotment for an important aspect of local government. It can be used as a guide for records management professionals to tailor their research and writing to an area that would be of the most use for those working in a local government environment.

Hopefully with experienced minds focusing on the issues raised in the examination of the City of Bellingham records program, additional creative solutions can be found to fixing lapsing records management programs in a time of tight budgets and staff cuts.

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