**Conducting Compliance Reviews**

A sound records management program will have a mechanism in place for auditing compliance. Policies and procedures are worthwhile only if they are followed and staff members are held accountable.

A compliance review, or audit, is an assessment of the processes that make up a system. Audits evaluate effectiveness and compliance, as well as help minimize risk. Conducting regular compliance reviews allows a department or office records liaison to identify and monitor areas in need of improvement. A records liaison should set and follow a time frame for conducting regular reviews, such as every other year.

Conducting a compliance review of records systems will help:

- Ensure compliance with the University's established directives
- Ensure that records will be accepted as evidence in a court of law
- Improve the University’s performance and efficiency

**Establishing a Compliance Review Program**

Compliance review success hinges on planning, execution, and results reporting. Successful records management reviews should be highly structured, which will help ensure that:

- Responsibilities are defined
- Scope and methodology of the review are clear
- Resources are identified and available
- Disruption to services is minimized
- Findings are identified and communicated
- Necessary improvements are made

**Defining the Scope of a Compliance Review**

Compliance reviews should focus on those areas where noncompliance poses the most pressing liability issues. Records liaisons should direct resources to areas where there are known problems. Areas of potential risk include, for example, the inability to recover essential records from a disaster in order to resume operations, and the protection and disposition of confidential records.

The scope of the review should also include which areas of the records management program will be completely reviewed and which will be reviewed using sample testing. Records destruction practices, for example, may be sample tested to reveal whether there is evidence that the requirements are generally being met. Other areas that may require more thorough examination include records storage and the
safety of confidential records. Time constraints and record volume will directly affect sample sizes and the choice between the use of sample testing and a more complete examination.

**Compliance Review Components**

A sound compliance review should answer the following questions:

*Are records management responsibilities clearly documented?*

The compliance review should holistically assess the effectiveness of a department or office’s records management program. A department or office is that is successfully managing their records will have a records liaison on file with the University Archives, awareness and education around the University’s records management policy, and procedures in place for managing records.

*Is records management education and training provided regularly?*

All individuals within a department or office are responsible for managing their records and should be aware of the University’s records management policy and retention schedules. Ensuring compliance across a department or office requires training on the principles of records management using the University’s policy and procedures.

*Is the records inventory up to date?*

At its most basic level, a records inventory identifies all records series, as well as their storage locations and format(s). All records created and maintained by the department or office, and their accompanying scheduled destruction dates, should be noted in the inventory using the University’s retention schedules as guidance.

*Are all of the records that are created/maintained relevant to business practices and captured using the appropriate system?*

It is important to begin managing records at their creation in order to effectively manage them throughout their life cycle. The compliance review should check that the department or office’s policies and procedures cover the capture, management, and secure storage of information, as well as whether those policies and procedures are being followed.

*Are records stored properly?*

Storage facility conditions and security controls should be studied for potential risks. Current measures to protect records from water and fire damage, proper control of access, and other security threats should be evaluated.
Are records disposed of properly?

The review should examine records disposal procedures and evaluate compliance with current retention schedules. Submission of properly completed Destruction Certificates should also be reviewed.

Are electronic records being managed properly?

The integrity and authenticity of records in electronic systems should be evaluated to help ensure that effective processes for accessing, maintaining, storing, and transferring electronic records are in place.

Are records securely managed?

Records containing confidential information must be managed in a secure manner and disposed of properly. This portion of the compliance review should focus on security controls within electronic, paper, and any other media-based systems. The compliance review should discover whether confidentiality has been breached or put at risk through the deliberate misuse of systems or because of weak, nonexistent, or poorly applied procedures.

Reporting Compliance Review Findings

Compliance review findings should be reported to the appropriate managers for action. Information learned from the compliance review, including possible better practices should be communicated throughout the department or office. Any changes made as a result of a compliance review should be clearly communicated to staff and, if necessary, incorporated into the department or office’s procedures.
## Records Compliance Review Checklist

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<thead>
<tr>
<th>Indicator</th>
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<tbody>
<tr>
<td>The department/office has designated a records liaison with the University Archives.</td>
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<td>A senior member of the department/office introduced all faculty and staff to the records liaison and explained their role.</td>
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<td>Records management responsibilities are listed in the records liaison’s positions responsibility statement.</td>
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<td>Appropriate department/office staff has been invited to attend records management training offered by the University Archives.</td>
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<td>All department/office staff has viewed the on-demand web training offered by the University Archives.</td>
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<td>A records inventory exists and is maintained for all department/office records (both paper and electronic).</td>
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<td>Department/office records are identified by records series and tracked for disposition.</td>
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<td>The department/office follows University Archives guidelines when selecting off-site storage vendors.</td>
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<td>The department/office carries out records destruction within the office at least once a year (both paper and electronic).</td>
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<td>The department/office reviews records stored off-site for those that are eligible for destruction at least once a year.</td>
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<td>The department/office regularly transfers appropriate records to the University Archives.</td>
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<td>Records of former employees are managed and tracked for retention purposes.</td>
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<td>Access procedures for paper records stored within the office are current.</td>
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<td>Access to electronic record systems is limited to only those who require frequent access.</td>
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