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# OFFICE OF THE CITY AUDITOR

## AUDIT OF THE RECORDS MANAGEMENT FUNCTION OF THE CITY SECRETARY'S OFFICE

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**August 1, 2003  
Report No. 388**

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## Memorandum



CITY OF DALLAS

August 1, 2003

Honorable Mayor and Members of the City Council  
City of Dallas

We have conducted an audit of the records management function of the City Secretary's Office.

We found that the primary objectives of the City's records management function are being achieved; however:

- The efficiency and effectiveness of the CSO's records management process and related procedures and practices should be improved.
- While records maintenance and disposition were generally in accordance with State statutes and City regulations, policies, and procedures, some records were kept beyond required retention periods.
- The economy, efficiency, and effectiveness of providing records management services should be improved.

Related opportunities for improvement are presented in this report.

We appreciate the cooperation of City staff during our examination.

*Thomas M. Taylor*

Thomas M. Taylor, CPA  
City Auditor

c: Teodoro J. Benavides, City Manager

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**AUDIT OF THE RECORDS MANAGEMENT FUNCTION  
OF THE CITY SECRETARY'S OFFICE**

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## EXECUTIVE SUMMARY

At the request of the City Secretary, we have conducted an audit of the records management function of the City Secretary's Office (CSO).

As a result of our inquiries, examination, and review, we conclude that the objectives of the records management function are being achieved; however:

- The efficiency and effectiveness of the CSO's records management process and related procedures and practices should be improved.
- While records maintenance and disposition were generally in accordance with State statutes and City regulations, policies, and procedures, some records were retained beyond required retention periods.
- The economy, efficiency, and effectiveness of providing records management services should be improved.

We have summarized our opportunities for improvement as follows:

- The City incurred additional record storage costs because various records were not timely destroyed and other records did not have a defined retention period.
- The CSO's automated status of checked out records is not consistently accurate, and record users do not return checked out records timely. These factors result in:
  - Not being able to timely identify the location of specific records.
  - Incurring additional record related charges.
- Listed record box contents are not consistently accurate. Without accurate content listings, departments may have to request more record boxes than actually required in order to locate the needed records, resulting in additional record retrieval costs.
- Some departments retain various records for periods significantly beyond required retention periods. We identified retained non-permanent records that were as much as forty-nine years old.
- The CSO's database:
  - Does not automatically track records that have been identified "for destruction".
  - Is not timely updated to reflect current record status.
- The CSO's file and index systems are inadequate, and various records are permanently retained that are not defined by the State as permanent records. These conditions are caused by the following:
  - The CSO has only one file series for all record types. Similar operations surveyed generally had multiple file series based on the characteristics/specifics of the various record types.

- The CSO does not have detailed, documented indexing procedures.
- The CSO treats all City Secretary Files (e.g., Administrative Actions, newsletters, responses to open records requests, documentation of destruction of City records) as permanent files, even though the State has not designated these as permanent records.
- The CSO does not have documented policies or procedures for processing permanent records or retrieving and refiling City Secretary Files.
- The CSO does not have adequate written inventory procedures for either on-site or contracted off-site stored records.
- Controls are not adequate to reasonably ensure that either City departments, boards, or commissions timely submit all required documents and records to the CSO.
- The CSO does not have documented policies or procedures for administering open records requests.
- The CSO is not following various provisions of the City Code regarding the records management program. Identified provisions that have not been followed include:
  - Developing a Citywide records management program. The CSO has drafted an administrative directive; however, it has not been approved for distribution.
  - The Records Management Officer (RMO) is to inspect all City records to ensure regulatory and policy compliance. To date, only departments that have requested assistance have been evaluated.
  - Each department director is to submit a records management program compliance status report to the RMO bi-annually. This requirement has not been fulfilled.
  - The RMO is to develop and submit procedures to the Records Management Policy Committee to ensure that historically valuable City records have been permanently preserved. Appropriate authorized personnel have not approved all procedures.
- The CSO's document recovery plan, as well as document safeguarding procedures, is inadequate.
  - RM does not have a written disaster preparedness and recovery plan for paper or microfilmed records and archives.
  - City Hall archive storage facilities are not adequately protected.
  - Over ninety-eight percent of the collections in the Dallas Municipal Archives are not backed up.
- Current Dallas Municipal Archives practices do not adequately protect the City's archived collections.

- The reference request form, documenting user identification and visit related data, is not completed for each user.
- Detailed collection data has not been developed for eighty-three percent of the archived collections.
- Current record accessioning procedures do not provide for adequate segregation of duties. The City Archivist receives the records, documents receipt, assigns a collection accession number, updates the archive accession listing, maintains the archives, and provides user services.
- The City's contracted records storage facility did not locate some requested records and did not timely retrieve other records. Subsequent to fieldwork completion, the CSO stated that all requested record boxes had been located.
- The CSO does not store all of the records of the Employees' Retirement Fund and the Police and Fire Pension Fund. The City Charter and City Code designate the CSO as the repository of records from departments, boards, and commissions.

## INTRODUCTION

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### **Authorization**

At the request of the City Secretary, we conducted an audit of the records management function within the City Secretary's Office (CSO). We conducted this audit under the authority of Chapter IX, Section 2 of the Dallas City Charter.

### **Scope and Methodology**

We performed our audit in accordance with generally accepted government auditing standards and included tests of the accounting records and other audit procedures that we considered necessary in the circumstances.

Our objectives were to determine whether:

- Internal controls were adequate and functioning properly to ensure maximum safety, security, and preservation of the City's records.
- The City's records were maintained and disposed of in accordance with the requirements established by applicable State statutes, as well as City regulations, policies, and procedures.
- Records management services are provided economically, effectively, and efficiently, and reasonably identify and incorporate opportunities for improvement.

Our audit covered the CSO's records management activity, and related functions, for the 20-month period of October 1, 2001, through January 31, 2003. We also reviewed certain related procedures, events, and matters occurring before and after this period.

We developed an understanding of relevant control structures through:

- Interviewing CSO management and staff.
- Reviewing applicable regulations and procedures.
- Inspecting facilities.
- Observing operations.
- Examining pertinent transactions and documentation.

## INTRODUCTION

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### Overall Conclusion

We found that the primary objectives of the City's records management function are being achieved; however:

- Efficiency and effectiveness of the CSO's records management process and related procedures and practices should be improved.
- While records maintenance and disposition were generally in accordance with state statutes and City regulations, policies, and procedures, some records were kept beyond required retention periods.
- Economy, efficiency, and effectiveness of providing records management services should be improved.

Specific issues are discussed in the Opportunities for Improvement section of this report.

### Background

The City Charter states that the City Secretary is responsible for overseeing the City's records management program and is to appoint a Records Management Officer (RMO) to administer the program. The City Code, Chapter 39C defines records management to include the:

- Development of record retention and disposition schedules.
- Management of filing and information retrieval systems.
- Protection of essential and permanent records.
- Economical and space-efficient storage of non-current records.
- Control over the creation and distribution of forms, reports, and correspondence.
- Management of manual, micrographic, electronic, and other records storage systems.
- Identification of functional record-keeping requirements that ensure City records are created to adequately document City business transactions.



## INTRODUCTION

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Under the City Secretary's direction, the six Records Management (RM) staff members:

- Assist departments with applying Texas State Library Retention Schedules (TSLRS). City Council Resolution #98-3152 approved the City's adoption of TSLRS guidelines in October 1998.
- Monitor and disseminate TSLRS changes that affect the City's records management program.
- Ensure obsolete City records are authorized for destruction prior to being destroyed.
- Provide records management training to department Record Liaison Officers and other applicable City personnel.
- Assist departments in reviewing disaster records and related backup recovery policies and procedures.
- Provide and facilitate access to public information provided under the Texas Public Information Act.
- Operate the City Records Center (RC) and the Dallas Municipal Archives (DMA).

The RC is a centralized repository for non-current records from all City departments. Repository resources are augmented by a commercial contracted storage entity, Iron Mountain Records Management (Iron Mountain).

The DMA was established in 1985 and has two locations within City Hall. It is the City's repository for needed, historic, and permanently valuable records of the City (e.g., City Council Minutes and Ordinances, John F. Kennedy Assassination Records). The City Archivist is responsible for maintaining the DMA. The RC uses the Dallas Municipal Archives and Records Center (DMARC) database for all phases of record transactions.

## MANAGEMENT'S ACCOMPLISHMENTS

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Management staff of the City Secretary's Office was asked to provide comments on recent procedural and operational accomplishments. Their unedited comments are shown below:

- Since January 2000 – 70,192 boxes have been identified and retention numbers assigned, which is nearly 97% of the records stored in the Records Center.
- Since January 2000 – 23,041 boxes have been reviewed and retention information included on the transfer form were approved for transfer to the Records Center.
- During the last two years, 27,855 boxes of records were destroyed following the Authorization for Records Disposal process (FY00-01 – 16,950 boxes and FY01-02 – 10,905 boxes).
- FY00-01 and FY01-02 – conducted 30 training classes teaching 482 City employees about records management, including retention, organizing active files whether in paper or electronic format, the City's responsibilities under the Texas Open Records Act, and how to determine if records have historical value.
- Since July 2000 – nine quarterly meetings have been held with the Departments Records Liaison Officers. The goal of these meetings is to keep departments informed on records management issues, including new legislation, services and products available, and projects conducted by other departments.
- October 2000 – negotiated and awarded a new 60-month records storage and retrieval services contract.
- The following departments' specific retention schedules have been developed and approved:
  - January 2, 2001 – Courts and Detention Services
  - October 12, 2001 – Trinity River Corridor Project
  - January 3, 2002 – Dallas Public Library
- January 30, 2001 – departmental records management policy was developed and approved for Courts and Detention Services.
- September 2001 – provided Human Resources a recommended filing system for employee records. Assisted with bid specifications for new file folders, new filing equipment, and move of the files from 2014 Main to City Hall.
- April - May 2002 – provided training and assistance to Dallas Police Department with preparations to move to new Police Headquarters building and filing equipment selection. Conducted three training sessions.

## **OPPORTUNITIES FOR IMPROVEMENT**

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We identified certain policies, procedures, and practices that should be improved. Our audit was not designed or intended to be a detailed study of every relevant system, procedure, and transaction. Accordingly, the opportunities for improvement presented in this report may not be all-inclusive of areas where improvements may be needed.

### **1. Record storage costs were increased because of operating practices.**

The City incurred additional record storage costs because eligible records were not timely destroyed and other records did not have assigned retention numbers.

- A. Various departments did not timely respond to the CSO's requests for evaluation of records eligible for destruction. Each department has authority over, and must approve any, destruction of its records. In August and September of 2000, RM gave various departments lists of their documents (29,795 boxes) that were eligible for destruction. Departments were requested to determine whether the identified records should be destroyed.

As of June 24, 2002, 22 months after distribution of the review lists, RM had not received responses on 6,331 (21%) of the listed boxes. The estimated storage cost for the 22-month period for the boxes is \$18,385.22.

During May - August 2001, RM distributed additional review lists showing an additional 4,599 records identified as eligible for destruction as of December 31, 2000. As of July 17, 2002 (14 months later), 2,649 boxes (58%) had not been destroyed, and the City incurred additional storage costs of \$4,505.16.

- B. Some records do not have a defined retention period or record destruction date. Therefore, retention for these records is unduly prolonged, and additional storage costs are incurred. Each record box should be assigned a record retention number that correlates to a predetermined retention period.

As of June 26, 2002, the DMARC database showed 2,826 stored record boxes without retention numbers. The estimated annual cost of storing these boxes is \$4,476.38. Over 98% of these boxes were transferred to the RC prior to January 2000. Assigning retention numbers was not required prior to January 2000; however, RM stated that they had assigned retention numbers to 70,192 pre-January 2000 boxes.

RM has been unable to obtain retention numbers for some records from several departments. During July - September 2001, RM sent lists (identifying 3,069 records boxes) to 14 departments requesting retention numbers. As of August 14, 2002, 3 departments had returned their review lists, 2 had returned partial review lists, and 9 departments had not responded.

## **OPPORTUNITIES FOR IMPROVEMENT**

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The City Code shows that RM is responsible for reducing record storage costs and improving record-keeping efficiency. RM has not discussed project time frames or potential consequences for non-compliance with departments. Completing reviews has been a low priority for most reviewing departments.

**We recommend** that the City Secretary:

- A. Re-issue review lists to the departments that have not completed reviews or taken needed action. In addition, send copies of the requests to the responsible Assistant City Managers. Include a summary of prior requests and a summary of specific individual departmental actions.
- B. Develop, implement, and distribute procedures and deadlines for the various reviews to the applicable departments. Departments should be directly billed for related storage costs if they fail to meet established deadlines (i.e., respond to the City Secretary within ninety days). Implementation of penalties should be coordinated with the City Manager's Office.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

- A. Copies of the current review lists will be re-issued to the department Records Liaison Officers with a 30-day deadline from the date of notification. Memorandums will be sent to the Department Director and the responsible Assistant City Managers notifying them of the need to respond promptly to request of evaluation of records eligible for destruction. Next January new review lists will be distributed to the department Records Liaison Officers. After 60 days, the Department Director will be notified if there has been no response. Timeframe: Review list will be issued within 30 days with a 30-day required response.
  - B. Next year's review lists will stipulate a 30-day deadline to respond. The recommendation to directly bill for related storage costs and implementation of penalties will be discussed with the Financial Services Office. Timeframe: Will visit with Financial Services Office in next 90 days.
- 2. CSO checked out record data is not current, and RC users do not return records timely.**

The DMARC database CHKOUT table is not timely updated, and the CSO incurs additional costs when users do not timely return provided records.

## OPPORTUNITIES FOR IMPROVEMENT

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- A. 1. The DMARC database CHKOUT table is not timely updated to show current record status. The City incurs additional costs when departments do not return checked out records as requested.

We judgmentally selected and reviewed nine DMARC Reference Request forms that were shown in the CSO's database as records that had not been returned. We found that the records for four of the sampled request forms had been returned to the RC and refiled, but the CSO records did not show that the records had been returned.

The records for the remaining five request forms were listed in the DMARC database's DISPOSED table (i.e., records destroyed). These records were listed both in the DMARC CHKOUT table and the DISPOSED table. The observed data indicated that the subject records had been returned and subsequently destroyed, but the CHKOUT table had not been updated.

A specific record should only be listed in one of the three major DMARC tables as follows:

- RECCEN table – lists all records that have been transferred to the RC that have not been destroyed. However, the table does not separately identify records that departments have temporarily checked out. Records in this table can be earmarked “for destruction.” After a record is destroyed, a “Dcode” entry can be made within the database to transfer the record from RECCEN to the DISPOSED table.
- CHKOUT table – lists records currently checked out as well as a history of when each record was checked out since inception of the “FoxPro System.” The record returned date should be recorded in this system.
- DISPOSED table – lists the records destroyed.

The DMARC database is not adequately integrated; thus, the CHKOUT table may still list destroyed records if RM has not updated the record status. Computer tracking systems should accurately reflect the status of all applicable records. Databases may be inaccurate due to untimely and/or inconsistent updating of record databases.

- A.2. RM is not enforcing its thirty-day record return policy. CSO procedures require users to return checked out records within thirty days after receipt. Completed request forms specify the record return due date. However, the forms and DMARC database CHKOUT table were not adequately monitored. RM personnel stated that the records belong to the user departments. The CSO did not enforce its own guidelines. The DMARC CHKOUT table showed that eight of the record boxes tested had been checked out for forty-two months and one for thirty-one months.

## **OPPORTUNITIES FOR IMPROVEMENT**

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- B. The City incurs additional costs when it reorders record boxes from Iron Mountain. Boxes are returned to Iron Mountain if checked out records are not returned within thirty days. Records requested from Iron Mountain are delivered to L2DN. Departments can request entire file boxes or individual files. If less than a box is requested, those files are removed from the box. RM retains the requested record boxes for approximately thirty days before returning them to Iron Mountain. When files are returned, RC staff re-orders the boxes. Iron Mountain charges \$1.30 for retrieving/refiling each box, plus \$10.00 for each round trip, irrespective of the number of boxes transferred.

We reviewed seventeen record requests and found that departments generally took from two-and-a-half to three-and-a-half months to return checked out items. Since requesting departments did not state that they intended to keep the files more than thirty days, RM returned the applicable record boxes to Iron Mountain. Record boxes were subsequently requested from, and then returned to, Iron Mountain a second time.

CSO user forms show that records are to be returned within thirty days. However, departments are not asked if they plan to keep records more than thirty days. The CSO's computer database is not programmed to show a list of records checked out for more than thirty days. In July 2002, the CSO requested departments to 1) adhere to the CSO's record return policy and 2) notify the CSO if they planned to retain checked out records. Departments are not adhering to the CSO's checked out document return policies. Since the CSO cannot control when checked-out boxes will be returned, applicable departments should be directly charged for all costs of retrieving records a second time.

The City Code states, "It is the policy of the City of Dallas to provide for efficient, economical, and effective controls over the creation, distribution, organization, maintenance, use, retention, and disposition of all records of the City of Dallas." To reduce the responsibility of RM personnel, record requestors should be required to take entire record boxes. This procedure will simplify CSO document tracking efforts.

**We recommend** that the City Secretary:

- A. Revise the operating procedures to ensure record tables are timely updated.
- B. Ensure user departments are aware of the thirty-day return policy, require customers to take entire boxes of records (irrespective of files needed), and charge departments if a record box is ordered more than once due to customers not returning files timely.

## OPPORTUNITIES FOR IMPROVEMENT

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### Management's Response:

The City Secretary's Office agrees with this finding.

- A. Will revise procedures to ensure timely updates are made to all three of these tables to reflect the status of the box or individual file.  
Timeframe: 90 days.
  - B. Will remind users of the 30-day return policy when they pick up records and explore options for preparing and distributing overdue notices. The department will require customers to take entire boxes of records, irrespective of files needed. Charges to departments if a record box is ordered more than once due to customers not returning files timely will be discussed with the Financial Services Office.  
Timeframe: 90 days.
- 3. City record transfer, retrieval, and related documentation procedures are inadequate.**

Departments transferring records to the RC for storage complete a CSO Records Transfer and Control List (RTCL). Information requested includes various record content related data. RM does not verify listed box contents.

CSO procedures do not require departments to provide record control numbers to the RC for their requests. Each archived box is given a unique record control number. If archived at Iron Mountain, retrieved boxes are delivered to L2DN. Requesting departments are not assessed for charges even if desired files are not in the retrieved boxes.

We judgmentally selected and reviewed ten DMARC Reference Request forms. On each sampled request form, RM commented that the requested information was not found in the ordered box. The RTCLs did not list the requested records for three of the boxes ordered. We were unable to determine why the seven other desired files were not in the requested boxes.

One possibility that one or more of the above records were not found is that the DMARC database does not automatically flag the "records in-use" status when a record is checked out. Thus, RC staff must do significant research to determine whether someone has already checked out the requested record(s). Accurate and proper completion of the RTCL is essential for accurate and expedient retrieval.

A second possible reason that the requested records were not found is that submitting departments did not 1) accurately or adequately complete the RTCL before transferring

## **OPPORTUNITIES FOR IMPROVEMENT**

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records and/or 2) requesting departments did not adequately research or verify the accuracy of the requested file record control numbers.

By not requiring departments to make written requests and/or provide needed record control numbers, RM increases the risk of retrieving incorrect records. In addition, checked out files are not earmarked in the DMARC database. Further, the City incurred non-productive and prolonged retrieval time as a result of ordering and receiving record boxes that did not contain needed documents.

**We recommend** that the City Secretary:

- Require submitting departments to formally attest, in writing, that initially transferred record box contents match the listed document titles.
- Revise current departmental record transfer procedures to ensure that desired records are obtained on the initial request and bill departments for unnecessary record retrieval costs incurred due to improper completion of RTCLs or other preventable errors and omissions.
- Revise the current CSO record retrieval procedures to require departments to make all record retrieval requests in writing and provide record control numbers.
- Program the DMARC database to ensure all checked out files are earmarked in the active file database. (Note: This recommendation was also part of the identified resolution in Opportunities for Improvement Number 2).

### **Management's Response:**

The City Secretary's Office partially agrees with this finding. The following issue will be addressed as follows:

- The "authorized by" signature, which is currently required on the transfer of record form, is attesting the transferred record box contents matches the listed document titles. The department will require the person signing to initial their name by the printed name.  
Timeframe: Beginning October 1, 2003.
- Will revise current departmental record transfer procedures to ensure that desired records are obtained on the initial request, and will discuss with the Financial Services Office, to bill departments for preventable unnecessary record retrieval costs incurred due to improper completion of RTCLs or other preventable errors and omissions.  
Timeframe: 90 days.



## OPPORTUNITIES FOR IMPROVEMENT

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- Will revise procedures to require retrieval requests to be written (including e-mail or electronic form) and include the control number of each box requested.  
Timeframe: Beginning October 1, 2003.
- Will investigate the cost and feasibility of programming the computer system to note in or out status on the checkout screen and in the RECCEN database.  
Timeframe: 120 days.

#### **4. Some departments retain various records significantly beyond required retention periods.**

Departments are required to provide record inclusive dates on the RTCL for each transferred box. The inclusive dates are the period range of documents contained within the individual box (e.g., 1/1/99-7/31/99). Currently, record boxes are kept until each contained document is eligible for destruction.

We judgmentally selected 4 Authority for Record Disposal forms (AFRDs), processed from October 1, 2001, to May 29, 2002, and then selected 25 listed boxes from the 4 AFRDs. Each box included records covering an extended time period. One box contained records that had a forty-nine year span; four boxes individually contained records that spanned twenty-two to twenty-six years; twelve boxes had records that individually spanned ten to eighteen years; and eight boxes contained records that individually spanned five to nine years.

RM provided the following reasons for the subject record boxes containing an extended time span:

- Many of the expanded time periods were in older records. Historically, there was little control over when records were transferred.
- Storage costs historically were thought to be less than the labor cost required to look at each file and separate them. Some department director level records are arranged by subject and used for many years. It was considered impractical to separate records by age once they were boxed.
- If record quantities are small, many consider it more practical to fill a box with records from multiple years than to store several partially filled boxes.

Since January 2000, the RMO has reviewed the RTCLs and prohibited mixing permanent and non-permanent records.

The City Code states that the RMO shall "provide uniform standards and efficient controls over the identification, appraisal, maintenance, protection, preservation, transfer, retention, and disposition of City records."

## **OPPORTUNITIES FOR IMPROVEMENT**

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The CSO does not have documented written policies that explain required filing and sorting procedures for records transferred to the RC. Thus, the City may incur additional storage costs for records that should be destroyed.

**We recommend** that the City Secretary develop, document, and distribute (to user departments) policies and procedures to ensure that transferred records:

- Placed in a single storage box do not cover an excessive time frame.
- Meet all City and other applicable regulatory guidelines and requirements.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

Will revise the Guideline for Storage and Retrieval of Records in the City of Dallas Records Center to stress that all records in one box should have retention periods that expire at the same time. The Records Management Officer will not approve boxes for transfers that do not comply until they have been corrected.

Timeframe: Immediately.

### **5. The DMARC database does not automatically track records identified for disposal and is not timely updated to reflect current record status.**

Seventy-five boxes, identified as eligible for destruction in 1998-1999, were not destroyed until January 2002, and most had not been removed from the database as of June 26, 2002.

RM designates boxes as eligible for disposal in the DMARC database by using a "Dcode" designation (a unique two-character code used to identify records to be destroyed). The DMARC database does not capture the date when the "Dcode" was entered. Therefore, it cannot generate lists that show how long individual boxes have been marked as eligible for destruction. However, CSO staff stated that these boxes had been labeled as eligible for destruction since October 1998 through April 1999. These boxes were not destroyed until January 2002, a minimum of 33 months after becoming eligible. Additional storage costs of \$326.70 were incurred.

Seventeen boxes were deleted from the DMARC database RECCEN table as of June 26, 2002. The 58 boxes remaining in the RECCEN table were not posted to the DISPOSED table until August 2002.

The records inventory tracking system should accurately reflect record status. The CSO's Authorization For Records Disposal Process states, "After records stored in the City of Dallas Record Center have been disposed of, the Records Management Officer is responsible for updating the tracking system database."

## OPPORTUNITIES FOR IMPROVEMENT

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The City incurred additional storage costs because the DMARC database did not automatically track the records identified for disposal, and RM did not follow internal procedures. The CSO's listing of files on hand was inaccurate. Therefore, RM does not have an effective means for quickly determining how long records have been marked as eligible for destruction or the number of archived record boxes.

**We recommend** that the City Secretary:

- Reprogram the DMARC database to automatically track the record retention period after records are marked for disposal.
- Implement procedures to timely update the DMARC database to ensure that the system accurately reflects current record status.
- Ensure that all eligible records are promptly destroyed (e.g., within three months).

### **Management's Response:**

The City Secretary's Office agrees with this finding.

- Will revise RECCEN table to include the date the DCode was added for each box, in order to report when a box is marked for disposal. A report will be run at least quarterly that shows the status of boxes during the disposal authorization process, so that problems in the approval process can be caught early.

When Authorization for Records Disposal approvals are not returned within 30 days, reminder notices will be sent to the record liaison officer.

Timeframe: October 1, 2003.

- Procedures will be revised to ensure that record status is update timely.  
Timeframe: Effective immediately.
- Procedures will be revised to ensure that records are destroyed promptly (within 30 days) of receiving all approvals.  
Timeframe: Effective immediately.

## **OPPORTUNITIES FOR IMPROVEMENT**

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- 6. The CSO's file and index systems and documented procedures are inadequate, and various records that are not defined by the State as permanent records are permanently retained.**

The CSO is the City's official record keeper and is the repository for many record types. Records filed in the CSO include:

- Council Actions Files/Minutes (CAFM) - Actions taken by the City Council and supporting documentation.
- City Sec Files (CSF) - Documents filed with the CSO that do not require City Council action [e.g., Administrative Actions (AAs), open records responses, newsletters, documentation of City records that were destroyed].
- Other administrative documents that are created by, and internal to, the CSO (e.g., timesheets).

The City Secretary Files are filed in pre-numbered folders. These files are arranged by year and consecutively numbered within the year (e.g., 02-0001 - the first two digits represent the year and the last four the folder number).

When reviewing the files, we identified the following concerns:

- A.1. There is only one file series for all document types (e.g., resolutions/ordinances, AAs, board/commission minutes). The first fifty pre-numbered file folders are reserved for recurrent files (e.g., Open Records Requests, NEWSLETTER-DART News). Other records are filed in the next available pre-numbered file folder.

CSO staff creates an Official Action of the Dallas City Council sheet for each Council action file and a City Secretary's Files sheet for each CSF, other than AA files. AA files are excluded due to the volume received. Folder contents are summarized on a sheet included in the applicable file folders. CAFM and CSF folders are differentiated only by their summary sheets.

The CSO surveyed various index cities (Austin, Boston, Columbus, Detroit, El Paso, Fort Worth, Houston, Philadelphia, Phoenix, San Antonio, San Diego, and San Jose) regarding record filing and indexing. Surveyed cities filed various record types (e.g., ordinances, resolution, board/commission records, elections) in separate file series.

Not putting the various file types in separate file series decreases user efficiency and makes document searches more time-consuming and frustrating.

## OPPORTUNITIES FOR IMPROVEMENT

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A.2. The CSO does not have detailed, written indexing procedures. The CSO Customer Service Representative is responsible for indexing and inputting CAFM and CSF into the City's LINC system. The Customer Service Representative inputs the following information:

- File number
- Date of action
- Description of file contents
- Descriptors (i.e., word or phrase to identify an item)

CSO staff can change or amend any entry in the computer index system since they are the primary users.

Communication and Information Services (CIS) downloads the computer index and transmits it to the City's microfilming vendor. Two microfiche versions are produced monthly (i.e., numeric and alpha orders). The index cumulatively includes all entries year-to-date, through month end.

December 31 is the year-end cutoff date for the index. CIS begins preparation of the microfiche index files approximately seven days later. However, there are updates to the index system after calendar year end (e.g., files not in the index prior to calendar year-end). The microfiche index is not updated for these additional items.

We judgmentally selected and reviewed the 2001 and 2002 CSO indices and identified the following:

- There are multiple files on the computer index that are not on the microfiche index.
- There are multiple spelling errors. (The current software does not have a "spell-check" function.)
- Index terms are inconsistent. Descriptors are not totally consistent and do not adequately identify the content of the underlying document(s). Current guidelines and procedures do not reasonably ensure consistency among file index terms (descriptors) used.
- Index terms are abbreviated and not defined for general users. The CSO has not developed or documented instructions that describe how to use the index.
- The index does not differentiate between CAFM and CSF. However, knowledgeable persons may be able to differentiate by the index date since the files with Council meeting dates are generally CAFM.

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Index terms should be clear, concise, and consistent with pre-approved standards. All critical and significant departmental practices and operations should be formally documented, as well as approved and dated, by authorized personnel.

- B. Some CSF records have mandated permanent retention, while others do not. TSLRS designate all CAFM as permanent records; however, some of the CSF records are not required to be permanently retained. Currently, the CSO treats all CAFM and CSF files as permanent records.

Permanent records are kept in active files for five years, then microfilmed with three copies for backup:

- A master that can be certified as having no splices.
- A master jacket that is stored off-site and used if duplicates must be made.
- A microfiche duplicate for general use.

The average file is seven pages, and the average cost to microfilm a file is \$4.16, which includes three microfilm copies and envelopes.

According to TSLRS, the retention period for:

- Open records requests is one year after a final decision is made on the request. Records in the CSO's open requests file date to 1989. These records are currently retained as permanent City records.
- AAs (except construction contracts) is four years after the expiration or termination of the instrument. These records are currently retained as permanent City records.

The City bears increased risks if records are kept beyond legal retention time parameters.

The CSO stated that over 1,100 AAs are filed annually; the direct costs to file each AA is approximately \$4.58. The direct external cost for filing and microfilming AAs for calendar year 2001 was \$5,262.43. CSO staff estimated that seven boxes of AAs are filed with the CSO annually. CSO staff stated that off-site storage costs for the seven boxes are \$9.10 for transfer and an additional \$11.20 per year for storage. Older files incur storage costs until they are destroyed. Subsequent use of original records, post microfilming, is rare.

The single file index increases the difficulty in segregating CSF permanent records from the non-permanent records. The CSO has not established documented criteria/procedures to determine which records should be classified

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as “permanent.” Further, the CSO has not given sufficient priority to developing written procedures for processing City Secretary Files to ensure this task is accomplished timely. The City will continue to incur additional costs if non-permanent records are treated as permanent files.

- C. The CSO does not have documented policies or procedures for processing permanent records or retrieving and refiling City Secretary Files. Department staff stated that any CSO employee may retrieve City Secretary Files. The file retrieval and refiling process includes:
- Completing an “out card” (user name, date, file number).
  - Placing the completed “out card” in an “out jacket.”
  - Inserting the “out jacket” where the file was removed.
  - Replacing the file and removing the “out jacket” when the file is returned.

CSO staff stated that files are seldom misplaced. When they are notified that a file is missing, they normally find it within two days.

Subsequent to our discussion, the CSO developed written policies and procedures [i.e., CSO's Procedures for Filing Documents into the City Secretary Files (REC 01.04)]. We have not evaluated these newly developed policies and procedures.

The CSO's mission statement states that the CSO is to “provide information to the public and help the public locate government information maintained by and for the City in accordance with requirements established by law and the City Charter.”

**We recommend** that the City Secretary:

- A.1. Examine the various document types and multiple file inventories/indices based on relevant criteria (e.g., document type, defined by State as permanent or non-permanent). Document indexing should reflect the altered file inventory structure.
- A.2. Develop and implement sufficiently detailed, step-by-step written indexing procedures. These procedures should reasonably ensure that:
- A complete index, including comprehensive instruction on its use, is available to all users.
  - Adequate, fully descriptive and defined index terms that include descriptions and definitions of unique City and CSO document titles (i.e., ADMIN ACT) are used.
  - File type is clearly written on the index.
  - Index input is accurate.

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High priority should be given to replacing the current computer indexing system with a more comprehensive indexing software package.

- B. Re-examine documents that are currently treated as permanent City-records and evaluate for compliance with documented State retention schedules and guidelines. Re-classify current permanent records to non-permanent as applicable. Any current permanent records that are reclassified as non-permanent, and exceed State recommended retention guidelines, should be quickly destroyed.
- C. Due to the actions taken by the CSO, we have no additional recommendation(s). Actions taken by the CSO will be evaluated during subsequent follow-up reviews.

### **Management's Response:**

The City Secretary's Office partially agrees with this finding.

- A.1 The City Secretary will examine the various document types and develop multiple file inventories/indices based on relevant criteria (e.g., document type, defined by State as permanent or non-permanent). Document indexing should reflect the altered file inventory structure.
- A.2 Will develop more detailed file indexing procedures and assure more consistency in index terms. We are looking at several options for replacing the LINC system. For any of the options, the replacement to LINC will provide a much more comprehensive index.
- B. Will examine all records of the office and evaluate in light of documented State retention schedules and guidelines to develop a department specific retention schedule. Any current permanent records that are reclassified as non-permanent, and are eligible for destruction following an approved retention schedule will be quickly destroyed.
- C. No action required by the City Secretary's Office at this time.

Timeframe: 12 months.

### **7. The CSO does not have adequate written inventory procedures for records stored at City facilities or at Iron Mountain.**

We requested written inventory procedures and documented inventory counts for City records stored at L2DN and at Iron Mountain. An inventory had not been conducted for records stored at Iron Mountain. The Assistant City Secretary stated she had discussed conducting an inventory of records stored at Iron Mountain's Carrollton facility, but procedures and arrangements had not been finalized.



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On July 22-26, 2002, CSO staff conducted an inventory of all records stored at L2DN. Annual inventory procedures for the intra-City stored records were drafted during our audit; however, we have not reviewed or evaluated these procedures.

The City Code states, "It is the policy of the City of Dallas to provide for efficient, economical, and effective controls over the creation, distribution, organization, maintenance, use, retention, and disposition of all records of the City of Dallas."

Documented departmental procedures do not require physical inventories of records. Corresponding document safeguarding and verification controls were inadequate to ensure that:

- Listed documents were accounted for.
- The CSO could reasonably determine whether other controls were adequate and working as intended.
- City departments could receive requested stored records in a timely manner.

**We recommend** that the City Secretary develop, document, and implement inventory policies and procedures for records stored at Iron Mountain. Procedures should be reviewed, approved in writing, and dated by appropriate responsible oversight and administrative personnel prior to implementing. A physical inventory of all stored records, including those within the City and at Iron Mountain, should be completed no less often than annually.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

The procedures for inventory of boxes stored at City Hall will be completed and will be expanded to include the process used for checking inventory stored at Iron Mountain. A complete inventory of boxes stored at City Hall for FY03-04 and a sampling some years with a threshold above which there will be a complete inventory. In all cases, a complete inventory of all boxes store in the Record Center will be completed at least every third year.

### **8. Controls are inadequate to reasonably ensure City departments, boards, and commissions timely provide all required documents and records to the CSO.**

The City Charter and City Code designate the CSO as the repository for documents and records that are required to be provided by departments, boards, and commissions. We asked whether the CSO had controls to ensure receipt of those documents (e.g., minutes, formal actions), but the CSO did not specifically respond. Currently, the CSO has not developed controls and procedures to reasonably ensure that all required

## **OPPORTUNITIES FOR IMPROVEMENT**

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records are received and subsequently stored to fulfill legal and other records management requirements. Such deficiencies may result in the violation of various City/State/other regulations and laws. Needed controls should provide adequate assurance that:

- All assigned responsibilities are identified and monitored by responsible personnel.
- Include procedures that reasonably identify records that were, or should have been, developed and mechanisms to track whether those records were promptly received.

**We recommend** that the City Secretary develop adequate controls to reasonably ensure that all required documents/records due from departments, boards, and commissions are timely received and retained in accordance with applicable laws and regulations.

### **Management's Response:**

The City Secretary's Office partially agrees with this finding.

The department will develop procedures to periodically check and notify departments of all documents/records to be submitted to the City Secretary's Office. The department currently tracks boards and commissions documentation related to filing of acceptance of oath of office, minutes, attendance, filing of financial disclosure reports, and required election documents (i.e., campaign contribution reports).

Timeframe: 90 days.

### **9. The CSO does not have documented policies or procedures for administering open records requests.**

We asked CSO staff what guidelines they had for administering City open records requests. They stated that there was a draft administrative directive, but no formal policies or procedures were currently in effect.

All open records requests received by the CSO are either handled by the CSO (i.e., a request for records administered by the CSO) or forwarded to the applicable department. All CSO records requests are given to a Records Analyst, who logs the request (i.e., request date, requestor, items requested) on an Excel spreadsheet. Requests are kept by requestor name order. Subsequent actions are not documented. A copy of the transmittal letter sent to the requestor is put in the file with the initial request. Any interim documents (e.g., estimate of fee to provide the requested information) are also placed in the document file. Upon completion, requests and related documents are transferred to permanent record files.

## **OPPORTUNITIES FOR IMPROVEMENT**

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Prudent business practice requires that all significant responsibilities be adequately addressed in formal, approved policies and procedures. Control over the open records program is not adequate. Thus, there is decreased assurance that open records requests are handled consistently or that they meet all applicable requirements.

**We recommend** that the City Secretary develop formal open records requests policies and procedures, distribute to all responsible personnel and departments, and establish adequate internal controls (including periodic reviews) to ensure all applicable policies and procedures are enforced.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

Procedures have been developed to address the internal process relating to open records requests. On an annual basis, the policies and procedures will be reviewed to ensure enforcement.

The City Secretary's Office will develop policy and pricing for open records, which will be posted on our website and available in printed format in our office.

Timeframe: Effective October 1, 2003.

### **10. The CSO is not following various provisions of the City Code.**

We identified the following deviations from, and non-compliance with, Chapter 39C of the City Code:

- Paragraph 10 requires that the RMO and Records Management Policy Committee (RMPC) develop a Citywide records management program. Program requirements, policies, and procedures are to include criteria that require Citywide and departmental compliance with the records management program. These requirements include:
  - Conducting departmental record inventories.
  - Preparing retention and disposition schedules.
  - Certifying the retention and disposition schedules, as well as the electronic records keeping system.

The RMPC consists of the City Attorney, the City Auditor, the City Manager, and the City Secretary. The City Secretary chairs the committee. The committee's function is to:

- Review and approve policy and procedural recommendations submitted by RM.

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- Establish other requirements, policies, and procedures necessary for the implementation and administration of the records management program for the City.

A formal policy has not been implemented. CSO staff drafted an administrative directive for records management; however, it has not been approved for distribution. The administrative directive establishes records management procedure requirements.

- Paragraph 9(18) requires that the City's RMO inspect all City records as directed by the RMPC, the City Secretary, the City Council, or other responsible body(ies) to ensure compliance with applicable regulations and guidelines. CSO staff stated that the RMO has not been directed to inspect any City records. The RMO has only worked with departments that have requested assistance.
- Paragraph 11(a)(7) requires each department director to bi-annually submit a records management program compliance status report to the RMO. CSO staff stated that this requirement has not been met.
- Paragraph 9(14) requires that the RMO develop procedures to ensure the permanent preservation of historically valuable City records. These procedures must be submitted to the RMPC for approval. However, the RMO has not submitted such procedures to the RMPC. Appropriate authorized departmental personnel have not approved some of the procedures.

Applicable departmental policies and procedures include REC 06.01 - REC 06.07 and REC 07.04. See the table below.

Procedure	Description	Effective Date	Approved By CS As of 12/11/02	Approved By RMPC As of 12/11/02
REC 06.01	Retrieving and Refiling Records	December 1, 2000	Yes	No
REC 06.02	Accessioning of Records	January 1, 2001	No	No
REC 06.03	Preservation of Records	January 1, 2001	Yes	No
REC 06.04	Finding Aids and Guides to Records	January 16, 2001	Yes	No
REC 06.05	Microfilming of City Secretary Files and Maps	**	**	**
REC 06.06	Logging and Storage of Audiotape of City Council and Board and Commission Executive Sessions	*	No	No
REC 06.07	Appraisal of Historical Records and Permanently Valuable Records	March 1, 2001	No	No
REC 07.04	Research and Reference for Citizens-John F. Kennedy/Dallas Police Department Records	*	No	No

\* The obtained copies do not show the effective dates.

\*\* CSO staff stated department personnel are currently drafting the procedure.

## OPPORTUNITIES FOR IMPROVEMENT

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Most of these procedures have been in effect since early 2001. The CSO stated that as of December 11, 2002, the City Secretary:

- Has approved REC 06.01, 06.03, and 06.04.
- Is reviewing REC 06.02, 06.06, 06.07, and 07.04.

CSO staff also stated that these are departmental policies and procedures that do not require RMPC approval.

Chapter 39C requires that the RMO recommend and prepare (for approval by the RMPC) requirements, policies, and procedures for the City's records management program. The RMO is also to administer the City's records management program, as well as to advise and assist department directors in implementing the records management program.

Since the CSO has not established and implemented formal, documented criteria or policies and procedures, as required by Chapter 39C, it is unlikely that departmental records management practices are in compliance with applicable regulations and guidelines. Thus, essential and historic permanent City records may not be adequately protected.

**We recommend** that the City Secretary develop and implement policies and procedures that will fully meet the requirements of Chapter 39C of the City Code.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

The draft Administrative Directive on Records Management will be revisited to ensure that all requirements of Dallas City Code Chapter 39C are addressed; including required compliance reports, inspection and audit of department programs, and preservation of historically valuable records.

Timeframe: Plan of action submitted to City Secretary – 90 days.

Approval of the Administrative Directive by the City Secretary and the Record Management Policy Committee

Timeframe: 12 months.

Start of Inspections and Audits of Departments

Timeframe: Will start 12 months after final approval of the Administrative Directive. (The delay in inspection and audits of departments will allow the City Secretary to train Records Liaison Officers on the new Administrative Directive and review the department's current policies related to inspection and audit of records).

## OPPORTUNITIES FOR IMPROVEMENT

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### 11. RM is not adequately prepared for disasters.

RM's disaster recovery plan, as well as document safeguarding mechanisms and procedures, is inadequate.

- A. RM does not have a written disaster preparedness and recovery plan for paper and microfilmed records and archives. Further, RM stated that most City departments do not have a written disaster and recovery plan for their paper records. RM staff said that CIS was developing a disaster recovery plan that included Citywide mainframe electronic records (e.g., email records, the CSO's index). RM staff stated that they have been trained regarding what to do if a disaster occurred. RM personnel stated that they had instructed City departmental record liaison officers regarding how to identify and protect essential records, including those in off-site storage, and the significance of contacting RM as soon as possible. RM stated that they were developing bid specifications for a price agreement for disaster recovery services for paper and microfilmed records that could be used by all City departments.
- B. City Hall archive storage facilities are not adequately protected. We inspected the DMA on June 11, 2002, and did not find a fire extinguisher at either location. At one site we found a closet used for storing various "minute books" that did not have a fire detection/fighting mechanism.
- C. Over ninety-eight percent of the collections in the DMA are not backed up. According to the DMA collection accession list, only 6 of 385 collections, as of July 2002, had been copied to microfilm, and 1 was being backed up on CD-ROM.

Archives that were not backed up included:

- Dallas Police Department – Historical Reports, Records, and Newsletters: 1930+
- Fair Park: 1899+
- Parks: 1906+
- Fair Park – Department of Park and Recreation Subject Files: 1930-1960
- Dealey Plaza – Department of Park and Recreation Subject Files: 1940-1941

The City Archivist stated the primary reasons that most archive collections have not been microfilmed are:

- Expense
- Infrequent use
- Absence of current preservation concerns

## **OPPORTUNITIES FOR IMPROVEMENT**

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The City Code states that the RMO shall protect essential and permanent City records and “in cooperation with department directors, identify essential records and establish a records disaster and recovery plan for each department to ensure maximum availability of the records in order to re-establish operations quickly and with minimum disruption and expense.” The CSO has not made developing a disaster preparedness and recovery plan and obtaining prevention equipment (fire extinguishers, sprinkler systems, etc.) sufficiently high priorities. Due to high cost, low usage frequency, and microfilming priorities, various archive collections have not been backed up.

Without adequate disaster preparation:

- Normal City business activities may be interrupted/unduly hampered.
- Citizens may lose valuable, irretrievable documents and resources.
- The cost to re-create severely damaged or destroyed documents may be prohibitive.

**We recommend** that the City Secretary:

- A. Develop and implement a written disaster preparedness and recovery plan that addresses all applicable records and archives and that meet all State and City requirements. In addition, the RMO should coordinate with department directors to establish a record disaster and recovery plan for each City department to maximize record availability (with minimum disruption and expense).
- B. Obtain adequate fire fighting and prevention equipment.
- C. Expedite the archive backup process, which may include cost-effective alternate copying mechanisms (i.e., CD copier) for backing up archived records. The CSO should develop archive backup priorities, then project time frames and develop completion targets.

### **Management's Response:**

The City Secretary's Office agrees with the finding of issues related to disaster recovery that directly affects the Record Management Program.

- A. The Administrative Directive on Records Management (see response to #10) will include department records disaster plans. The Records Liaison Officers will be given training on disaster recovery with strong emphasis on disaster preparedness and prevention. A review of the department record disaster and recovery plan will be part of the inspections and audits as required in Dallas City Code Chapter 39C.  
Timeframe: Will start 12 months after final approval of the Administrative Directive.

## OPPORTUNITIES FOR IMPROVEMENT

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- B. Will meet with DFD Fire Prevention to discuss and acquire appropriate fire prevention equipment for the two Archives storage areas if funds are available.  
Timeframe: 60 days.
  - C. Will develop a priority list of archives items and collections considering various protection and/or duplication options and related costs. A plan of action will be developed contingent upon available funding and personnel resources. Duplication of the complete Archives is cost prohibitive because of the large volume, unusual formats and fragile nature of the materials.  
Timeframe: 6 months.
- 12. Current DMA practices do not adequately protect the City's document collections.**

Archive operating procedures are not consistently enforced or fully developed and documented.

- A. The DMA Reference Request form is not filled out for each user. The form has two sections. The requestor completes the top section, and CSO staff completes the bottom section. The user should fill in the visit (i.e., each separate trip to archives) date; his/her name, driver's license number, and telephone number; and specific archive materials requested. Archive staff is to document the materials pulled, the person pulling the materials, and the person refiling the materials.

A separate request form should be completed for each visit. The requestor is required to provide a valid driver's license if they are not a City employee. Original City records are currently provided to persons that are not City employees. This practice raises significant control related concerns.

CSO staff stated that the request form is not used consistently. The City Archivist uses this form judgmentally. CSO staff stated that the City Archivist usually fills out a request form for a first-time visitor, but notes subsequent visits on separate informal documentation.

We judgmentally selected and reviewed six user data collection documents, three for City employees and three for non-City employees. We found one visit recorded on a request form. The other five were recorded informally (i.e., information recorded on a non-standard medium). The driver's license numbers for the non-City employees were not recorded.



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CSO staff stated that archive users are observed by the City Archivist and are asked to leave purses and notebooks at the front desk while using the DMA collection. CSO staff indicated that the City Archivist is not required to use the request form.

- B. Physical inventories have not been taken for DMA collections, and detailed collection contents have not been developed for all collection items. CSO staff stated that an archive collection inventory has never been performed. As of July 2002, there were 385 archive collections in the DMA, according to the collection accession listing. A detailed description of each collection is documented in a guide. The collection guide identifies the contents of the box/folder (e.g., Box 1: Reports 1900-2000, Folder 1: Annual Report). According to the City Archivist, over 65 (17%) of the collection guides have been completed and the remaining 83% had no detailed content descriptions.
- C. Current record accessioning procedures do not provide for adequate segregation of duties. CSO accessioning of records procedures state that archive accessioning is the process by which a repository takes physical custody of, and assumes legal and administrative control over, a body of records. The purpose of accessioning is to identify a body of records as a singular unit when they are transferred to DMA's custody. When departments transfer custody of historical, valuable records to DMA, the City Archivist physically receives the records, documents receipt, assigns a collection accession number, updates the accession listing, maintains the collections, and provides references to users. Vesting of these cumulative duties and responsibilities in a single person violates a basic tenet of internal control that requires adequate segregation of duties (i.e., no individual should have a degree of control that would allow the person to both commit and cover-up an irregularity). CSO staff stated that they do not record materials added to a previously received collection.

The City Code states that the RMO shall "provide uniform standards and efficient controls over the identification, appraisal, maintenance, protection, preservation, transfer, retention, and disposition of City records and the records management program requirements, policies, and procedures must properly preserve City records that are of historical value."

CSO archives retrieving and refiling records procedures are not being adequately followed, and the CSO has not developed written inventory and related policies and procedures for DMA collections.

Developing and documenting adequate comprehensive inventory policies and procedures for the City's archive collections have not been given a sufficiently high priority to ensure timely task completion. Therefore, the City's archives may not be adequately protected from potential loss or safety and security risks.

## OPPORTUNITIES FOR IMPROVEMENT

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**We recommend** that the City Secretary:

- A. Implement CSO archive retrieving and refiling record procedures to ensure each archived record request is formally, adequately, and consistently recorded on DMA Reference Request forms, and that the driver's license number of each non-City employee requestor is obtained and recorded on the request form.
- B. Develop and implement written inventory policies and procedures for DMA collections that include:
  - Expediting the process of establishing a complete archives inventory system (including archive collections, finding guides, inventories, etc.) for DMA collections.
  - Establishing, developing, and documenting priorities, project time frames, and required completion dates.
- C. Develop and implement procedures to adequately address record accessioning issues as shown below:
  - Adequately segregate the following duties:
    - Receiving archive collections.
    - Documenting collection receipts.
    - Maintaining the accession listing.

Supervisors should periodically review these tasks to ensure they are adequately accomplished. A different person should perform each of these tasks.

- Ensure that all inventory listings, collection descriptions, and other relative records are timely updated for all received collection additions.

### **Management's Response:**

The City Secretary's Office partially agrees with the finding.

- A. The department will address the retrieving and refiling record procedures. The recommendation that driver's license of each non-City employee requestor be obtained and recorded on the record request form by responsible DMA staff is going to be addressed through Regulations for Use, which has been in effect since January 2002. Since the current procedures do not require identification, the I. D. requirement has been temporary removed from the request form until the procedures have been revised. However, if records are taken offsite for use, a driver's license will be required.  
Timeframe: 60 days.

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- B. The department will develop and implement written inventory policies and procedures for DMA Collection.  
Timeframe: No later than May 2004.
  - C. The department will develop and implement procedures to adequately address record accessioning issues as stated in the Internal Control report submitted to the City Manager on May 29, 2003.  
Timeframe: No later than May 2004.
- 13. Iron Mountain did not find some requested City records and did not timely retrieve others.**

Iron Mountain took sixteen months and three days to find and deliver one box of records, one month and twenty-eight days in another case and, to date, has not located another box of records.

### **Request #980491**

In 1997, a City department requested a record file box. The box was delivered to L2DN, and the needed file was pulled. The record box was subsequently returned to Iron Mountain. The requesting department returned the checked out file to the RC in 2001. RC staff again requested the box on April 4, 2001. Iron Mountain delivered the box on August 7, 2002, 16 months after requested. Iron Mountain's records show that RM requested the box on five separate dates (i.e., April 4 and 25, 2001, October 3, 2001, December 14, 2001, and January 16, 2002) before it was delivered.

### **Request #20024151**

A City department requested a box from RM on June 6, 2002. Iron Mountain's records show that the RC requested the box from Iron Mountain on June 10 and 17, 2002. Iron Mountain delivered the requested box on August 7, 2002, 58 days after initially requested.

### **Request #20022642**

RM requested a record box from Iron Mountain on March 6 and 13, 2002, and May 15, 2002, according to Iron Mountain records. Iron Mountain had not located the box as of November 20, 2002.

The terms of the City's contract with Iron Mountain show that if a request for record retrieval is placed by 11:00 am (Monday-Friday), it is to be delivered to City Hall before 4:30 p.m. that day. A rush/emergency request is to be delivered within two hours, 24/7. According to the RMO, there is no penalty clause that monetarily compensates the City if the contractor misses delivery timeframes or loses City records. However, Iron Mountain has agreed to pay the City \$10 for each record box in their possession that is not found. The City does not pay the delivery trip charge (\$10 regular round trip, \$25 for

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a rush trip) if the requested record is not delivered on time. If a rush order is delivered with a regular order on the same trip, the City pays only the regular trip charge.

The City Code states, "It is the policy of the City of Dallas to provide for efficient, economical, and effective controls over the creation, distribution, organization, maintenance, use, retention, and disposition of all records of the City of Dallas."

The City Code requires the RM to protect the essential and permanent records of the City.

Requested records have been significantly delayed in two cases and not found in a third instance. Valuable and unrecoverable City records may have been lost.

**We recommend** that the City Secretary initiate discussions with Iron Mountain to determine additional steps to more fully ensure prompt retrieval of all requested records, including additional penalty assessments for future contract amendments and subsequent contracts.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

As a result of this finding, discussions were held with Iron Mountain in August 2002, which resulted in all three of these boxes being located promptly thereafter. The City Secretary's Office will take under advisement the recommendation with the City Attorney's Office to include penalty assessments in future contract amendments or subsequent contracts when the contract comes up for renewal.

Timeframe: Will consider when the contract comes up for renewal in 2006.

### **14. The CSO does not archive/store records of the Employees' Retirement Fund (ERF) or the Police and Fire Pension Fund (PFPF).**

The City Charter and the City Code designate the CSO as the repository of records from departments, boards, and commissions. Thus, we asked the CSO whether the:

- ERF and/or the PFPF stored their records in the RC.
- Pension funds followed the retention schedules as adopted by the City Council.

CSO staff stated that ERF has 519 boxes stored with the RC/Iron Mountain and that they are following Council approved retention schedules. ERF has not stored additional record boxes in the RC since ERF left City Hall approximately two years ago. During the intervening period, ERF has only requested the RC to retrieve about ten boxes.

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CSO staff stated that the PFPF has 284 boxes stored with the RC/Iron Mountain. However, RM does not receive PFPF Board Minutes, and PFPF stores additional records (unknown quantity or record type) with another storage provider, Safe Site. Discussions among the PFPF Administrator, the City Attorney's Office, and the CSO Records' Manager did not conclude whether the PFPF was functionally part of the City. PFPF staff includes six City civilian employees.

The CSO has minimum contact with ERF and PFPF regarding the maintenance, retention, and disposal of records and has not determined whether the ERF/PFPF have the option of outsourcing record storage and archiving functions.

The CSO cannot currently verify whether records maintained external to the CSO are adequately protected, maintained, or stored or whether those records are handled or administered in accordance with City Council adopted guidelines.

**We recommend** that the City Secretary consult with the City Attorney's Office and request a legal opinion regarding whether the ERF or the PFPF must have the CSO oversee their stored and archived records and adhere to Council approved records management guidelines. If the City Attorney's Office concludes that the Funds are subject to the CSO's records management oversight, immediate steps should be taken to transfer all stored records to the CSO, and both ERF and PFPF should be required to follow records management procedures, as do other City departments.

### **Management's Response:**

The City Secretary's Office agrees with this finding.

The City Secretary's Office will request a legal opinion regarding whether the Employees' Retirement Fund or the Police and Fire Pension Fund have the authority regarding whether City Secretary's Office should oversee their stored and archived records, or to adhere to Council approved record management guidelines. A response will be forthcoming once the City Secretary has an opportunity to review this finding with the City Attorney's Office.

Timeframe: 60 days.