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To: Theodore Lipscomb, Sr., Chairman
Milwaukee County Board of Supervisors

From: Margaret C. Daun, Corporation Counsel
Julie P. Wilson, Assistant Corporation Counsel

Subject: Informational Report Regarding Milwaukee County Off-Site Records Storage and Records Retention Practices with Outline of Phased Work by Corporation Counsel to Prepare Future Recommendations for Action by County Board

In an October 26, 2016 Amendment to the County Executive's 2017 Recommended Budget, the Milwaukee County Board of Supervisors authorized and directed Corporation Counsel to "develop a countywide plan for public off-site records retention." The Amendment directed that the plan "centralize the responsibility of, and payment for, any records held by the County to meet public document retention laws," and "include best practices for public records retention and address policies and procedures for off-site storage."

In his November 21, 1990 report to the County Board of Supervisors, County Records Manager Dennis Larsen quoted an unattributed study on records management in local government, observing that:

Inefficient record keeping practices often evolve slowly and swallow scarce resources unnoticed. The costs of such practices usually remain hidden beneath small, incremental expenditures for new equipment and space, or behind longstanding staff work patterns. Every poor record keeping practice costs money.

(Report by Dennis Larsen, Records Manager, Information Management Services Division to Supervisor F. Thomas Ament, Chairperson, County Board, November 21, 1990, File No. 90-974.) This observation perhaps proved prophetic. An extended period of inattention to records management has resulted in room for substantial improvement of Milwaukee County processes.

This informational report highlights the applicable sources of law, the recent history of County records retention, and the process for adopting necessary updated retention schedules. It then outlines recommendations for phased follow-up investigation and work to achieve best practices and appropriate funding and staffing for consistent compliance with records retention laws. This report addresses the specific issue of off-site storage, and therefore is primarily concerned with storage of tangible items. There is a similarly urgent and pressing need for

Milwaukee County to engage in long-range planning for retention and disposition of electronic records.¹ However, that critical issue is beyond the scope of this report, which, as noted above, is focused on tangible (i.e., hardcopy) records. This report outlines short-term action items to be undertaken without any fiscal impact or the need for County Board action. It also outlines a proposed second phase of longer-term work to improve County records retention processes, which will result in Corporation Counsel presenting recommendations for action by the County Board at a later date.

I. OVERVIEW OF KEY STATUTES, ORDINANCES, AND ADMINISTRATIVE PROCEDURES GOVERNING COUNTY RECORDS RETENTION

Milwaukee County must comply with Wisconsin records retention laws. In addition, improved records retention practices will benefit continuity of operations, provision of public access to government records, mitigation of risk, and preservation of history. Proper record retention also reduces litigation risk and may ultimately lead to significant cost savings. This section of the report identifies the key statutes, ordinances, and Milwaukee County Administrative Manual Procedure relevant to retention of County records.

A. Wisconsin Statutes

Wisconsin Statutes require preservation of government records and the transfer of records of permanent historical value to the historical society. Wis. Stat. §§ 19.21, 19.23. As in all Wisconsin counties, the Milwaukee County Board of Supervisors may:

Provide, by ordinance, a program for the keeping, preservation, retention and disposition of public records including the establishment of a committee on public records and may institute a records management service for the county and may appropriate funds to accomplish such purposes.

Wis. Stat. § 19.21(5)(e). In addition, as a populous county, Milwaukee County is authorized to “provide by ordinance for the destruction of obsolete public records,” other than certain court records. Wis. Stat. § 19.21(5)(a).

Generally, Milwaukee County records must be maintained for seven years, unless a different period is set by law. Wis. Stat. § 19.21(5)(c); *see also* Wis. Stat. §§ 7.23, 59.52(4)(a). Therefore, it is important for County subject matter experts, with the assistance of Corporation Counsel, to become familiar with the sources of law which may define the correct retention period for their Department’s records. Milwaukee County may seek approval for shortened retention periods by application to the State of Wisconsin Public Records Board. Wis. Stat. §§ 19.21(5)(c), 16.61(3)(e).

¹ Corporation Counsel advises that the County Board consider requesting a similar review of past practice, current policy and processes, and the presentation of recommendations with respect to electronic records, in cooperation with Information Management Services Division.

The historical societies must be notified at least 60 days prior to destruction of most obsolete County records. Wis. Stat. § 19.21(5)(d)1. By operation of County Administrative Procedure 3.02, notice is to be made to the Milwaukee County Historical Society first, and then the State of Wisconsin Historical Society. This notification process allows the societies to determine whether to preserve the records. This obligation does not apply to patient health care records in the custody or control of a local health department. Wis. Stat. §§ 19.21(5)(d)2., 146.81(4) (defining health care records), 250.01(4)(a) (defining local health department to include a county department of human services). The statutes provide for transfer of records with a confidential character to the historical society under terms appropriate to protecting the confidential information. *See* Wis. Stat. § 19.21(5)(d)1. The statutes allow the historical society to identify records in which it has no interest, and to accept transfer of any records deemed to be of permanent historical value. Wis. Stat. §§ 19.21(5)(d)1, 19.23. Thus, there is a substantial benefit to working cooperatively and proactively with the historical societies.

The Wisconsin State Public Records Board must approve any retention schedules created by Milwaukee County. Retention schedule is defined to mean “instructions as to the length of time, the location and the form in which records series are to be kept and the method of filing records series.” Wis. Stat. § 16.61(2)(cm). The State Public Records Board may set minimum retention schedules for county records and make other orders concerning the destruction or retention of county records. Wis. Stat. § 16.61(3)(b), (e).

B. Milwaukee County Ordinances

A number of sections of the Milwaukee County Code of General Ordinances concern records retention and management. Consistent with the County Board of Supervisors’ authority under Wis. Stat. §§ 19.21(5)(a) and (e), the ordinances address creation of a county-wide records center, records management services, and a records committee.

Chapter 56.14 creates a records management system, stating as policy: “Programs for proper management of county records are deemed necessary to promote economy and efficiency in the day-to-day recordkeeping activities of the county government and to provide for preservation and safekeeping of vital records.” MCO § 56.14(1). The Ordinance specifically concerns records of “any department, institution, office, commission, board or agency of the county excluding constitutional officers and the courts.” MCO § 56.14(2)(b), (4), (5), (7). Most significantly, the section creates a County Records Committee. MCO § 56.14(3). Members of the records committee include Corporation Counsel, the Comptroller, the Director of Transportation, and the Director of the Milwaukee County Historical Society, or their designees; the Committee is chaired by the Director of the Department of Administrative Services or his or her designee. *Id.* The Records Committee is charged with establishing procedures for records management, procedures for the preparation of retention schedules, and security for vital records, among other items. MCO § 56.14(4).

The last documented meeting of the Records Committee our research identified occurred in 2005. However, anecdotal indications are that the Records Committee perhaps last met in 2009.

In 1990, Chapter 32.65 was created and provides authority for the Department of Administration to establish a county-wide record center “for the storage, management and control of inactive departmental records.” This section also sets policy regarding records storage, requiring all Departments to “utilize the record center for the storage of inactive department records which are required to be retained.” MCO § 32.65(2). “Inactive records are defined as those which must be retained beyond the established departmental office storage period of the county records committee approved retention schedule,” though the Ordinance allows Departments to seek approval of the Records Committee for alternative inactive records storage arrangements. MCO § 32.65.

Also in 1990, Chapter 32.66 was created and requires the Department of Administration to “establish and administer a records management program which shall provide services to all county departments pursuant to guidelines promulgated by the county records committee[.]” MCO § 32.66(1). Among the services contemplated by this section are the storage of inactive records, disposal of obsolete records, creation of records retention schedules, records management training, and staffing of the Records Committee. MCO § 32.66(1), (2).

Chapter 32.22(1)(f) empowers the Department of Administration - Procurement Division to “[h]ave charge of storage facilities established centrally for the use of all Departments.” Other than minor revisions, this subchapter has changed little since it was repealed and recreated in 1981.

C. Milwaukee County Administrative Procedure Manual

Section 3.02 of the Administrative Procedure Manual (created July 1, 1969; revised October 2, 2000) addresses the Record Retention Program. It defines roles for key staff and the process for creating retention schedules. The Procedure further provides a flow chart for how records should be retained on-site, transferred to off-site storage, and eventually, destroyed or transferred to the Milwaukee County or State Historical Society.

II. HISTORY OF MILWAUKEE COUNTY OFF-SITE RECORDS RETENTION

An understanding of Milwaukee County’s recent off-site records storage practices is key to identifying the appropriate next steps to improve retention processes and to budget for those efforts. In brief overview, from 2005 to present, Milwaukee County has had a relationship with C.H. Coakley & Company for off-site storage of public records. The relationship has been based on a price agreement, and work to develop a contract with Coakley or another vendor is ongoing. Before that, from 1998 to 2005, Milwaukee County operated a records center staffed by County employees in leased property on Wirth Street. In this report, references to “boxes” contemplate one cubic foot of records; boxes may contain one or more “files.”

A. C.H. Coakley & Company storage

1. Transfer of County records to Coakley in 2005

In 2005, Milwaukee County transferred approximately 77,000 to 78,000 boxes of records from the County-operated Wirth Records Center to C.H. Coakley & Company (“Coakley”) and provided “legacy information” about the boxes’ contents and applicable retention periods. The legacy information was added to Coakley’s computer database, “InfoKeeper.”

In 2006 or 2007, Milwaukee County provided Coakley with retention periods for a large number of records series. These retention schedules were then built into Coakley’s InfoKeeper database. When the County Records Committee was active, Coakley was contacted approximately two times per month to receive updated records series information. When received, Coakley adds this kind of information to InfoKeeper. Over time, most of the additions to the system have been to identify new records series. Coakley has very infrequently been asked to alter an existing retention period.

2. Current use of Coakley storage and records recall services

As of mid-June 2017, Milwaukee County has 146,300 “active” boxes in storage, meaning the boxes are either on-site at Coakley or have been checked out of storage and are with the Department owner of the records. To contextualize this number, to move Milwaukee County’s records in boxes on pallets would require 146 semi-trailer trucks, each 53-feet in length. In 2016, total costs for Milwaukee County’s use of Coakley services were \$512,000.

InfoKeeper is used by both Coakley and County employees authorized to send records to storage, recall records from storage, or direct their destruction. When an individual authorized to send records to storage enters information about a file or box in InfoKeeper, his or her selection of a record series automatically populates a records retention date associated with its contents.

The manner in which County records are sent to or recalled from storage differs from Department to Department. According to Coakley, the Civil and Criminal Divisions of the Courts send the largest number of files / boxes to storage. The Civil Division keeps files on-site for two years after closing. In the third year, Coakley staff is employed to assist with on-site labeling and boxing, data entry into InfoKeeper, and moving boxes to off-site storage. This results in 1,000 to 4,000 boxes being sent to off-site storage per year. At the time of judicial rotations, the Courts frequently have an increase of approximately 150 to 400 boxes being sent to storage or recalled. The Criminal and Children’s Court Divisions send boxes to storage throughout the year and perform their own labeling and data-entry. The Criminal and Civil Divisions recall the most files / boxes from storage. The Department on Aging and Department of Administrative Services – Architecture, Engineering and Environmental Services Division each recall files / boxes fairly regularly, about once or twice a week. Other County Departments and Divisions recall boxes much less frequently.

County-wide, approximately 125 files / boxes are recalled and transported from Coakley each day. Some 99% of these requests are for files rather than boxes. The total number has been trending down over time, which may reflect that more current records are being created and stored electronically. This may also reflect that records are being appropriately stored on-site during the period they are most likely to be needed and transferred to storage only to wait out the required retention period.

There is an increasing problem with incompletely identified records being sent to off-site storage. Approximately 563 boxes and 82 file cabinets are “widowed” in storage, meaning there is no information identifying the Department which owns the box or the contents of the box. Many of the boxes date to the original 2005 transfer. However, the number of newly widowed boxes is on the rise more recently. A possible explanation for this occurrence is that Departments are boxing and bar coding their records for pick-up by Coakley, but failing to follow-up by logging into InfoKeeper to enter the necessary information.

3. Current use of Coakley services for disposition of County records

As of mid-June 2017, Milwaukee County has 52,500 boxes of records stored at Coakley which are eligible for review for disposition, based on the retention schedules set in InfoKeeper. Since 2009, Milwaukee County has directed the disposition of a total of 23,020 boxes.

Proper use of Coakley’s system allows only individuals with destruction decision-making power to direct disposition. Records owners are identified in InfoKeeper by high and low organization numbers. Each Department should have at least one designated individual with InfoKeeper credentials. However, only certain individuals have “destruction access,” ordinarily the Department head. This individual with destruction access must authorize any other individuals to access the InfoKeeper system. To access the records in person, advanced notice is required so that Coakley may confirm the person’s authorization.

Practices among County records owners differ widely with respect to routine review and disposition of records. InfoKeeper users are able to generate reports identifying Department records that have reached their designated retention period. However, it is unclear whether custodians are routinely running such reports, and Coakley does not currently notify custodians about records ready for review and disposition.

For appropriate reasons relating to security and risk management, Milwaukee County must initiate the process for reviewing and destroying records. Until a custodian with decision-making authority instructs Coakley, records will not be destroyed. The authorization can be provided in writing or through InfoKeeper. Very few Departments routinely provide Coakley with instructions on records destruction. It is very infrequent that Departments review the records prior to directing their destruction, meaning great reliance is placed on the correct labeling of records at the time of their storage and on the retention schedule designated at the time the records are sent to storage.

Under current arrangements with Coakley, destruction can take several paths. Having boxes or files pulled from shelves incurs a fee. If boxes or files are returned to shelf, there is

another fee. There are charges associated with having a box or file loaded and transported to a County office. There is also a destruction fee. For offices wishing to review records before they are destroyed, Coakley can arrange a work area on-site in their facility. Reviewing records on-site and directing destruction at that time will avoid re-shelving and transportation fees. There is a fee for permanent withdrawal of records if, for example, a records custodian opts to withdraw and maintain on-site or destroy the records themselves.

Once records have been authorized for destruction by Milwaukee County, a multi-step process is followed by Coakley resulting in shredding of the records. None of the shredding operations take place in Coakley's facility, but rather through another company with which Coakley maintains a service agreement. All Coakley employees involved in the shredding process receive HIPPA training. A chain of custody of sorts is logged as records move toward destruction, and ultimately a destruction certificate is produced.

B. Milwaukee County operation of Wirth Street Records Center, 1998 to 2006

The history of the County's operation of the Wirth Records Center explains why the County decided to store public records awaiting their disposition date in off-site storage with Coakley. Information provided by Coakley personnel indicates that during the County's operation of the Wirth Records Center, Requests for Proposals ("RFP") were put out annually to compare the costs of in-house and private storage options. Those RFPs were coordinated by the County Records Manager prior to his retirement in 2006. This section of the report summarizes some of the key information about operation of the Wirth Records Center from 1988 to 2006.

In 1988, the County Records Committee endorsed the final report of the County Records Management Study, including the concept that a County Records Center be established consistent with the needs and capabilities of County government. A half-year appropriation of \$100,000 was provided to the Department of Administration Information Management Services to enable the establishment of a Records Center. (County Executive's 1989 Budget Summary of Expenditures and Revenues, September 29, 1988, Journal of Proceedings of Board of Supervisors for Milwaukee County ("Journal of Proceedings") at p. 1731).

In 1989, a resolution was adopted authorizing the Acting Director of the Department of Administration to execute a fifteen-year lease, based on a five year out clause, with Barry Company for the Wirth Building located at 12200 W. Wirth Avenue in Wauwatosa. The resolution authorized a square footage rental rate not to exceed \$5.25 per square foot. Using the balance of the Courthouse Master Plan funds designated for Graphics, \$214,000 was designated to furnish the space at the Wirth Building and relocate Procurement's offices and stationary stores, Graphics' Press Section, and County records to this building. (File No. 89-597(a)(a), July 20, 1989, Journal of Proceedings at p. 1847).

The 1989 adopted budget included a \$100,000 half-year appropriation for operation of the Record Center. On September 28, 1989, the County Board adopted a resolution, File 89-597(a)(a), authorizing and directing the Acting Director of the Department of Administration to relocate Procurement offices, Stationary Stores, the Graphics' Press Section, and County records to the

Wirth Building. The appropriation was included in a general purpose account pending determination of actual operational needs. The needs were subsequently identified and included \$75,000 for shelving, \$12,688 for a computer system and software to manage the materials that are stored at the site, \$7,550 for space rental and \$4,762 for miscellaneous expenses. The Record Center was approved for a full year's operation in the 1990 Adopted Budget. In addition, the status of the Record Center was reported to the County Records Retention Committee on November 21, 1989, as required in the 1989 Adopted Budget. (File No. 89-1, December 14, 1989).

In 1990, the County Records Manager recommended the creation of the County Records Center, the creation of MCO §§ 32.65 and 32.66, and the amendment of MCO § 56.14. His report to the Chairman of the Board of Supervisors highlighted that storing a box (cubic foot) of records in a four drawer file cabinet at the Courthouse cost \$11.74 per year, while at the new Records Center it would cost \$2.16 per year, and storing with a major storage company would be \$3.12 a year. His report also emphasized the County Record Center as the best option for maintaining County records in good condition, and providing for their "ethical" disposal. (Report by Dennis Larsen, Records Manager, Information Management Services Division to Supervisor F. Thomas Ament, Chairperson, County Board, November 21, 1990, File No. 90-974).

As recommended, new ordinances 32.65 and 32.66 were created and ordinance 56.14 was revised to update Records Committee membership titles to be consistent with then-current operations, as well as change the reporting requirements regarding Records Management. (File No. 90-974, December 13, 1990). The 1990 Adopted Budget provided a full-year appropriation for operation of the Records Center. (Adopted 1990 Budget).

The 1991 Adopted Budget reflects that Record Center costs were recovered from charges made to County Departments for storage of materials. To constrain Record Center costs, two inmates from the House of Correction were utilized for record storage and retrieval activities. In addition, the services of an assistant to support record management activities were arranged through an agreement with the University of Wisconsin – Milwaukee. (Adopted 1991 Budget).

The 1992 Adopted Budget sought new ways to contain Record Center costs. Departments continued to be charged for the storage of materials. One inmate from the House of Correction was assigned for record storage and retrieval activities. (Adopted 1992 Budget).

The 1993 Adopted Budget reflects that the Record Center continued to provide records storage, retrieval, and destruction services to Departments. In addition, the Records Manager staffed the Records Committee and provided consultative services to Departments on record retention policies, procedures, and operations. One position of Record Center Coordinator was created due to the growing responsibilities of the record retention program, including an increase in the volume of boxes stored in the Record Center, which rose from 12,289 in 1991 to a projected 27,000 boxes by the end of 1993. The cost of the Record Center Coordinator was partially offset by the abolishment of one position, Management Analyst II. A position of Record Center Technician was created to handle an anticipated increase in the number of requests for records retrieval – estimated to be 3,171 requests in 1993. Creation of the position was intended to allow

the Record Center Coordinator to provide more assistance to Departments in records management. In summary, the staffing changes were as follows:

- Create 1 Record Center Coordinator, eff. 3.28.93 - \$38,007
- Create 1 Record Center Technician - \$29,757
- Abolish 1 Management Analyst II, eff. 3.28.93 – (\$36,613)
- Abolish 1 Management Analyst II, eff. 3.28.93 – (\$36,613)

(Adopted 1993 Budget).

The Adopted 1999 Budget changed staffing levels at the Records Center. One Clerk III Data Entry Records was created, increasing personnel services by \$25,840. Partially offsetting this increase was a reduction of \$8,720 for short-term contractual help. (Adopted 1999 Budget). The 2000 Budget reflects a steady increase in storage needs – there were 49,122 boxes stored in 1998. The Budget estimated storage of 55,000 boxes in 1999 and 2000.

The 2005 Adopted Budget reflects the determination to obtain records management from a commercial records vendor when the Wirth Building lease expired. The anticipated net savings to Records Services was \$35,719. (Adopted 2005 Budget). The 2006 Adopted Budget included a full-year appropriation in the amount of \$405,285 for operations of the commercial records management vendor. Two employees were also transferred from Records Management to Administrative Services. (Adopted 2006 Budget).

III. RECORDS RETENTION SCHEDULES

There are benefits to be realized by Milwaukee County in improving its process for adopting and obtaining required approval of retention schedules. The County's prior practices resulted in sprawling and cumbersome retention schedules. Since 2006, efforts to maintain proper schedules appear to have ceased.

Milwaukee County currently lacks an approved retention schedule and is therefore bound by the default seven-year retention period, unless another shorter or longer period explicitly applies by law. Milwaukee County last made its last submissions to the State Public Records Board in December 2005, prior to the retirement of Dennis Larson, Records Center Coordinator. The submissions were approved on February 27, 2006. However, all approved retention schedules sunset after 10 years, unless the State Public Records Board sets different sunset date. Wis. Stat. § 16.61(4)(c).

A. Process for obtaining State approval of County retention schedules

The State of Wisconsin Public Records Board meets quarterly to review and consider requests by local governments for approval of retention schedules, which requests are submitted on a prescribed form. The submissions are reviewed by the Public Records Board for "content, completeness, compliance and conformity to legal, audit, operational and historical significance." (<http://publicrecordsboard.wi.gov/category.asp?linkcatid=3592&linkid=1527&locid=165>).

Milwaukee County should seek to have its most recent schedules approved once more to maintain the status quo and allow time for research and recommendations regarding updated schedules. The next scheduled deadline for submissions to the State Public Records Board is September 8, 2017. The State Public Records Board Records Management Committee will meet on October 17, 2017, and Milwaukee County should have a representative present at that Committee meeting to answer questions. The full State Public Record Board will next meet on November 20, 2017. If, at that meeting, any submissions by Milwaukee County are approved, the schedules are forwarded to the State Archivist and then to the Public Records Board Executive Secretary for signatures before being returned to the County. If a schedule is not approved, the State Public Records Board may provide information about the reasons for the denial to guide the County's follow-up work.

B. Option to adopt existing retention schedules created by others

Milwaukee County can benefit from the work of others in adopting existing records retention schedules. For example, through the work of a task force organized by the Wisconsin Counties Association, a records retention/disposition schedule tailored to Wisconsin counties was developed and approved by the State Public Records Board in 2010. Milwaukee County failed to adopt that schedule, though it is unclear if that was the product of considered decision making or a failure to recognize the opportunity. Among the benefits of adopting this, or any other, existing schedules is that the retention periods have already been vetted for legal requirements, been approved by the Public Records Board, and may have already been vetted by the Historical Societies. In addition, existing schedules may reflect the realities of local government's business needs for retaining particular categories of records. Adoption of existing schedules does not mandate the creation of records identified therein, even if the schedules include records of a variety not created or maintained by Milwaukee County. Consultation with the State Public Records Board confirms that none of the counties that have adopted the Wisconsin Counties Association schedule have since abandoned it, suggesting the schedule has been satisfactory.

IV. RECOMMENDED PHASED FOLLOW-UP EFFORTS TO IMPROVE RECORDS RETENTION PROCESSES

A. Immediate and short-term activities

Corporation Counsel will work with all Departments to identify appropriate records custodians and improve public posting of these custodians for purposes of public records compliance. In tandem with these efforts, Corporation Counsel will guide Departments' review of the designated users of Coakley's InfoKeeper system.

To enhance security, once appropriate InfoKeeper users are identified, Coakley will be directed to reset all InfoKeeper passwords. Thereafter, Coakley will provide training to all appropriate InfoKeeper users. This training will improve practices for sending records to storage, sufficiently identifying records to permit accurate recall for purposes of records requests or litigation, and review of records for disposition. The training will also cover how to generate

reports to identify aged records. Coakley has agreed to provide such training on an annual basis without charge.

Corporation Counsel will request that the Chair of the Milwaukee County Records Committee convene a meeting. The Records Committee will be asked to consider approving Corporation Counsel's efforts to seek reauthorization by the State Public Records Board of Milwaukee County's most recent retention schedules. This request will be submitted by September 8, 2017, and Corporation Counsel will be present to address questions at the October 17, 2017 State Public Records Board Record Management Committee meeting. The Milwaukee County Record Committee should also consider acting to transfer interim management of the Records Committee to Corporation Counsel.

The Procurement Division, in consultation with Corporation Counsel, will continue to work on development of an updated pricing agreement or contract with Coakley or another vendor. This is essential to future recommendations regarding a centralized records budget or an appropriation to fund review and disposition of aged County records in off-site storage.

Corporation Counsel has obtained reports as to each Department's aged records. We will consult with custodians regarding the scope of the work required to appropriately dispose of aged records.

B. Second phase of recommended investigation and work, with follow-up reporting by Corporation Counsel to County Board in six to twelve months

In the next phase of recommended work, Corporation Counsel will report to the County Board regarding the status of State Public Records Board reauthorization of County retention schedules. Corporation Counsel will also make recommendations regarding possible existing retention schedules, including the Wisconsin Counties Association's schedule, which Milwaukee County should consider adopting.

In addition, Corporation Counsel will work on recommended revisions of the records retention ordinances. The ordinances can likely be amended to better reflect the reality of how records management has evolved, and to provide for better overall practices.

Corporation Counsel will also work with the Historical Societies to identify improvements in the County's notification and preservation processes. The InfoKeeper system may not be adequately populated with information about the Societies' interest in preservation of certain categories of records. Updating this information could streamline the preservation process and timeline.

With updated information about pricing for off-site storage services, Corporation Counsel will work closely with the Central Business Office and Comptroller to determine how to centralize the budget for routine records activities. In addition, Corporation Counsel will help to develop and will report to the County Board its recommendations regarding the nature and extent of staffing

necessary to effectuate improved records processes and the lawful disposition of aged County records now in off-site storage.
