

---

# **CITY OF SAN ANTONIO**

## **OFFICE OF THE CITY AUDITOR**



Audit of Office of the City Clerk

Record Retention and Archives

Project No. AU17-005

April 23, 2018

Kevin W. Barthold, CPA, CIA, CISA  
City Auditor

---

## Executive Summary

---

As part of our annual Audit Plan approved by City Council, we conducted an audit of the Office of the City Clerk, specifically Record Retention and Archives. The audit objectives and conclusions follow:

**Determine if the City's record retention and archives processes are adequate and in accordance with regulations and internal policies (to include physical security).**

The Office of the City Clerk implemented manual processes to process incoming storage and record destruction requests. Manual controls are working as expected to ensure compliance with record retention guidelines set forth by the Texas State Library and Archives Commission (TSLAC). Additionally, controls are effective to ensure records are appropriately reviewed and authorized to be destroyed. However, we did note the following areas where the Office of the City Clerk should improve record retention and archive processes:

- Documentation was inaccurate and/or lacking regarding department Record Liaison Officers (RLO), daily warehouse inspections, and training.
- Records located in the Municipal Archives & Records (MARs) facility could not be found, and were subject to unauthorized access.
- Automated systems and equipment used in the MARs facility for incoming storage and destruction processes are out of date and inoperable.
- The MARs facility Disaster Preparedness Plan is outdated and not finalized.

# Table of Contents

---

Executive Summary .....	i
Background.....	1
Audit Scope and Methodology .....	2
Audit Results and Recommendations .....	3
A. Records Liaison Officer Program .....	3
B. Municipal Archives & Records Facility .....	4
C. Disaster Preparedness Plan .....	6
Appendix A – Staff Acknowledgement .....	7
Appendix B – Management Response.....	8

## Background

---

Pursuant to City ordinance 70508 (November 1, 1989), the holder of the Office of the City Clerk of San Antonio was designated as the Records Management Officer of the City of San Antonio. In addition, City ordinance 72054 (August 9, 1990) established a records management program administered by the Records Management Officer. The Records Management Officer shall develop policies and procedures in the administration of the City's records management program.

Records management includes the creation, use, maintenance, retention, preservation, and disposal of records for the purposes of reducing the costs and improving the efficiency of recordkeeping. Retention period refers to the minimum time that must pass after the creation, recording or receipt of a record or the fulfillment of certain actions associated with a record, before it is eligible for destruction. The City follows the Texas State Library and Archives Commission mandatory minimum retention period schedule for local government records. Departments designate Records Liaison Officers (RLO) responsible for managing department records and ensuring compliance with City record retention guidelines.

The Records Management and Archives Divisions facilitate the management, retention, and destruction of records as well as the management and preservation of historic documents. Records of historical value have a permanent retention period. Documents stored at the Municipal Archives and Records warehouse are tracked, via a shelf location, utilizing the Hummingbird system. Information, such as document description, year, retention period, and barcode number is recorded in Access, which is used to upload the information to Hummingbird. On November 20, 2008, ordinance 2008-11-20-1025 was approved authorizing funds for a new system for records storage. The Office of the City Clerk also utilizes the \$1.00 preservation fee from issued birth certificates towards preservation of records and archives.

## Audit Scope and Methodology

---

The audit scope included review of City ordinances, city and state policy and procedures related to record retention, training, record storage and disposal processes, and physical security of the records warehouse. Our audit period was October 1, 2016 through September 20, 2017.

We conducted interviews and walkthroughs with key City Clerk and Municipal Archives and Records (MARs) facility personnel. We used City Administrative Directive 1.34 “Records Management for Physical Electronic Records”, Texas Administrative Code Title 13 (Chapter 7, Subchapter F) “Record Storage Standards”, and the Texas State Library and Archives Commission (TSLAC) retention schedule as criteria for our test work.

To determine compliance with regulations and internal policies, we reviewed a sample of 47 department Record Liaison Officer (RLO) training records retained at the MARs facility to verify RLOs received the required training. We reviewed the list of 215 RLOs from the *cosaweb/rlo* website for accuracy of information. We also reviewed a sample of 13 incoming storage requests for accuracy of the retention timeframe per the TSLAC retention schedule. Additionally, we reviewed 18 barcodes and their respective locations to determine the records were found in the locations and for accuracy of the information recorded in the Hummingbird system. We also reviewed a sample of 19 destruction requests fulfilled in FY2017 to ensure destruction documentation contained the required signatures.

We relied on computer-processed data in SAP, the City’s accounting system, to review the preservation fee and the corresponding account. Our reliance was based on performing a review of the data rather than evaluating the system’s general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Audit Results and Recommendations

---

### A. Records Liaison Officer Program

#### 1. Documentation and Training

The department Records Liaison Officer (RLO) list is inaccurate. In addition, not all RLOs have a signed RLO Designation Form on file and/or have not attended RLO training.

Records Liaison Officers are designated by department Directors to assist in managing records under their custody, and complying with the policies and procedures of the City's records management program. RLOs are required to attend annual RLO training, provided by the Office of the City Clerk. In addition, RLOs must have an RLO Designation Form on file, signed by the RLO's department Director. The form also contains records management responsibilities and rules for visiting the MARs warehouse.

We reviewed the list of 215 RLOs, which was last updated 12/22/16. We identified 24 designated RLOs that were no longer employees of the City. We also noted 14 RLOs that were no longer in the department listed, and 5 emails that were incorrect for the RLO listed.

We also randomly selected a sample of 47 RLOs from the list and reviewed files retained at the MARs facility for an RLO Designation Form on file and evidence of annual training. We identified the following:

- 16 (34%) had evidence of annual training and a signed RLO Designation Form on file.
- 14 (29%) had evidence of annual training, but no signed RLO Designation Form on file.
- 13 (28%) had NEITHER evidence of annual training, nor a signed RLO Designation Form on file.
- 3 (6%) had no evidence of annual training, but had a signed RLO Designation Form on file.
- 1 (2%) stated they were not an RLO, but were still on the list.

Without accurate documentation and adequate training, individuals could obtain unauthorized access to records stored at the warehouse, and/or records could be inadvertently lost or destroyed prior to their minimum retention deadline.

## **2. Records Access**

RLOs are not escorted while in the warehouse, and documents are not inspected prior to the RLO leaving the facility to ensure unauthorized documents are not being taken.

RLOs and visitors enter the warehouse through an access-controlled door, which only MARs employees have access. In addition, RLOs and visitors must sign out upon leaving the facility. According to the RLO Warehouse Policy, RLOs are not allowed to browse, photograph, or access other department records while at the warehouse. In addition, RLOs must leave written record in their respective department's folder of records removed from the warehouse.

However, we observed that once inside the warehouse, an RLO is not escorted throughout the warehouse, potentially accessing records not directly within the RLO's area of responsibility. In addition, MARs staff does not conduct physical inspection of records taken by RLOs to ensure the records belong to the RLO and their department, as required by policy.

Inadequate physical security processes could result in unauthorized access to records; in addition to, records being lost or stolen.

### **Recommendations**

A.1 – The City Clerk should conduct periodic reviews of the RLO list to ensure it is updated and accurate. While reviewing, the City Clerk should ensure that all RLOs listed have a signed RLO Designation Form on file and have attended training.

A.2 – The City Clerk should develop procedures to enhance physical security of records in the warehouse to include:

- Ensure RLOs access only those records within their direct responsibility.
- Ensure records from the warehouse are not being taken by those that should not have access and/or ability to remove the records.

## **B. Municipal Archives & Records Facility**

### **1. Warehouse Maintenance**

Daily inspections of the warehouse facility were not documented, and maintenance issues were not tracked.

MARs staff conducts daily walks of the warehouse facility inspecting for water leaks, signs of insect/rodent infestation, and other hazards that may damage records.

We conducted several onsite visits to the MARs warehouse facility during the course of the audit, and noted that several leaks existed in which tarps, buckets and trash cans were used to catch water and protect records near leaks. MARs staff noted this was an on-going issue; however, they were unable to provide specific documentation regarding maintenance requests and resolution. During a subsequent visit, we noted that the tarps, buckets and trash cans had been removed.

Without adequate documentation of inspections and maintenance issues, ongoing problems may not be resolved, resulting in damage to records.

## **2. Incoming Storage Processes**

Automated records management systems and equipment are outdated and inoperable. Manual incoming storage practices are not adequate to ensure records are not lost or misplaced.

MARs staff track and record incoming records with box description, location, and retention period in the Hummingbird system. Barcoders scan the barcode on the boxes and the location barcode, and automatically upload into Hummingbird. However, the barcoders are inoperable. MARs staff manually records storage locations on Incoming Storage Forms that are placed in a folder to be manually input into Hummingbird at a later time.

We randomly selected 18 boxes from Incoming Storage Forms on file and the corresponding locations. We were unable to locate 2 (11%) of the 18 boxes, which were on the same Incoming Storage Form from March 2017. The boxes were not in the location written on the back of the form, and the locations had not yet been entered into Hummingbird.

Without accurate documentation and timely input of information into automated system, records could be lost, or unable to access as needed.

## **3. Equipment Safety**

Safety training of warehouse equipment, such as the industrial shredder is not documented. In addition, safety equipment such as goggles and masks are not mandatory for shredder operators.

The MARs warehouse utilizes an industrial shredder that shreds large amounts of documents at one time. Staff that operate the shredder are briefly shown how to operate it; however, training is not documented. Gloves and masks are available, but only optional to ensure operators are protected from the dust created when large amounts of documents are shredded at one time.



Without proper training that is documented and mandatory safety equipment, the City could be liable if employees are injured in the course of utilizing the shredder.

## **Recommendations**

B.1 – The City Clerk should develop procedures to document daily warehouse inspections, to include maintenance issues such as water leaks. Documentation should also include the date of service request, and the date when the issue was resolved.

B.2 – The City Clerk should enhance manual processes and controls to ensure locations of records are accurate. Enhancements could include additional training for warehouse staff and department RLOs, and prompt entry of data into existing system.

In addition, the City Clerk should pursue automated solutions to include fixing and potentially upgrading existing automated equipment to increase the efficiency of storage and disposal processes.

B.3 – The City Clerk should ensure training of equipment utilized at the MARs warehouse is documented, and safety equipment is mandatory and utilized during operation of the shredder.

## **C. Disaster Preparedness Plan**

A Disaster preparedness plan exists for the MARs facility; however, it is out of date and in draft from 2012.

*City Ordinance 72054, Section 8.3* discusses the establishment of a disaster plan to ensure maximum availability of the records. Records stored in the MARs facility are subject to damage due from disasters to include, but not be limited to, fire, water, infestation, and mold. Disaster plans assist in preparing for possible disasters to recover records affected by those disasters.

We reviewed the Disaster Preparedness Plan for the MARs facility and noted that it is currently in draft form, and dated 2012. The plan contained names no longer with the Office of the City Clerk and MARs facility.

Without a current and effective disaster preparedness plan, damage to records may not be reduced and permanent records could be lost.

## **Recommendation**

The City Clerk should update the Disaster Preparedness Plan.

## **Appendix A – Staff Acknowledgement**

---

Amy Barnes, CFE, CGAP, Auditor in Charge  
Holly Williams, CISA, CRISC, Auditor

## Appendix B – Management Response



### CITY OF SAN ANTONIO

P.O. Box 839966  
SAN ANTONIO TEXAS 78283-3966

March 8, 2018

Kevin W. Barthold, CPA, CIA, CISA  
City Auditor  
San Antonio, Texas

RE: Management's Corrective Action Plan for the Audit of the Office of the City Clerk  
Record Retention and Archives

The Office of the City Clerk has reviewed the audit report and has developed the  
Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A.1	<b>RLO Documentation and Training</b>  The City Clerk should conduct periodic reviews of the RLO list to ensure it is updated and accurate. While reviewing, the City Clerk should ensure that all RLOs have a signed Designation Form on file and have attended training.	3	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	02/05/2018
	<b>Action plan:</b> In an effort to call attention to the importance of the Municipal Records Program and the role played by Departmental RLOs in maintaining departmental records; the Municipal Records Policy has been updated to require the department to notify staff of any RLO changes, which triggers submission of a RLO Designation Form and completion of training.  Staff will update the entire Departmental RLO List annually while revising as new information becomes available.				


Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A.2	<b>Records Access</b>  The City Clerk should develop procedures to enhance physical security of records in the warehouse to include: <ul style="list-style-type: none"> <li>• Ensure RLOs access only records within their direct responsibility.</li> </ul> Ensure records from the warehouse are not removed by unauthorized employees.	4	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	02/05/2018
<b>Action plan:</b> To date, the unauthorized removal of records from the warehouse has not been encountered. To ensure the continued security of physical records, staff will remind RLOs of their signed Designation Form indicating RLO responsibilities, the Records Warehouse Policy, and procedures for addressing non-compliance.  RLOs are restricted from taking personal items into the warehouse; thus allowing Staff to verify the unauthorized removal of records.					
B.1	<b>Warehouse Maintenance</b>  The City Clerk should develop procedures to document daily warehouse inspections, to include maintenance issues such as water leaks. Documentation should also include the date of service request, and the date when the issue was resolved.	4	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	01/03/2018
<b>Action plan:</b> Office of the City Clerk staff has created a log entitled "Warehouse Maintenance and Repair Log" which will document said issues encountered, if any, during daily inspections.					

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
B.2	<p><b>Incoming Storage Processes</b></p> <p>The City Clerk should enhance manual processes and controls to ensure locations of records are accurate. Enhancements could include additional training for warehouse staff and department RLOs, and prompt entry of data into existing system.</p> <p>In addition, the City Clerk should pursue solutions to potentially upgrade existing automated equipment to increase the efficiency of storage and disposal processes.</p>	5	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	02/13/2018
<p><b>Action plan:</b> The use of the Hummingbird RM/DM System is inefficient as the system is outdated and supported by ITSD on a limited basis. Functionality of the RM/DM System is limited as reports reflecting the volume of records stored in the warehouse and identification of records eligible for future destruction can no longer be generated. Additionally, the Bar Coding System used to inventory incoming records and reflect assigned location has not been operational in over a year. Without fully functional infrastructure, Staff is not able to effectively implement the City's Records Management Program or manage warehouse space and is required to manually complete automated tasks.</p> <p>Please see attached Ordinance 2008-11-20-1025, Ordinance 2009-04-30-0338, and a Request for Council Action Memorandum dated 4/30/2009, which should have replaced our antiquated Barcode and Records Management Systems.</p> <ul style="list-style-type: none"> <li>Replacement of the Municipal Records Facility current system of identifying and tracking each box or container used for the storage of city records. This new system will also allow the easy retrieval of these physical documents utilizing a barcode system for tracking.</li> </ul> <p>Mrs. Leticia Vacek, City Clerk, met with Craig Hopkins, ITSD Director, to continue to stress the importance of ITSD's support in pursuing upgrades to our Barcode and Enterprise Content Management Systems. Furthermore, ITSD has provided an update as of Feb 13, 2018 as follows:</p> <ul style="list-style-type: none"> <li>Upgrade [to FileNet] was successfully completed and issue has been resolved; new PCs, with updated version of KoFax, have been deployed to the Records Division of the Office of the City Clerk (confirmed on 02/08).</li> <li>Currently evaluating a proposal from DAS vendor to perform discovery and provide a Statement of Work for Hummingbird data migration and decommissioning.</li> <li>Team is reviewing shared services inventory to determine if an enterprise barcoding system is available.</li> </ul>					

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	The operation of required infrastructure and staffing levels greatly impacts the ability of the Office of the City Clerk to keep up with customer demand. During the time of the audit, the shredder was awaiting repair and staff was processing requests submitted when the Archives and Records Divisions encountered vacancies. As of February 2018, the motor and front conveyor wheel were replaced allowing for the processing of submitted destruction requests while making space available for incoming records.				
B.3	<b>Equipment Safety</b> The City Clerk should ensure training of equipment utilized at the MARs warehouse is documented, and safety equipment is mandatory to utilize during the operation of the shredder.	5	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	01/22/2018
	<b>Action plan:</b> Staff has received training on the mandatory use of safety goggles and masks when operating the industrial shredder.				
C	<b>Disaster Preparedness Plan</b> The City Clerk should update the Disaster Preparedness Plan.	6	A	Nat Norton, Archivist and Melinda L. Uriegas, Assistant City Clerk	01/31/2018
	<b>Action plan:</b> The Disaster Preparedness Plan has been updated to reflect current procedures as well as 2018 points of contact.				

We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,

  
Leticia Vacek  
City Clerk  
Office of the City Clerk

03/09/2018  
Date