



**RECORDS MANAGEMENT EXPERIENCE WITH  
BIG BUCKET RETENTION:  
A STATUS REPORT**

**By**

**William Saffady**

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## **Purpose and Organization of this Report**

This report examines the current status of big bucket retention, a widely discussed approach to lifecycle management of recorded information that groups related records in broad categories with uniform retention guidance. The report begins with an explanation of big bucket retention concepts followed by a survey of records management publications, web sites, and other sources that document the historical development of big bucket retention schedules and discuss their advantages and limitations. The most important sections of the report present findings from interviews with experienced records management professionals who have developed big bucket schedules in government agencies, companies, and not-for-profit organizations. The interviews were conducted in the first quarter of 2018.

The purpose of the interviews was to obtain reports “from the field” about the objectives, issues, concerns, problems, and outcomes of big bucket retention initiatives. The interviews focused on the circumstances in which big bucket schedules were developed, the characteristics of retention schedules they replaced, the size and scope of big bucket schedules, the benefits obtained, issues and problems encountered during schedule development and implementation, and acceptance or resistance by user departments, but participants were encouraged to speak freely about other aspects of big bucket retention. Participants were assured that the interview findings would be reported in aggregate, that interviewees would not be personally identifiable based on their responses to specific questions, and that their organizations would not be identified beyond a general description of the type of entity for which the big bucket schedule was developed.

## **The Big Bucket Concept**

A retention schedule identifies records that are maintained by all or part of an organization and indicates the period of time that the records are to be kept to satisfy legal, operational and historical requirements. In a traditional retention schedule, an organization’s records are listed by series—that is, by groups of logically related records associated with

specific business or administrative operations.<sup>1</sup> The record series may be organized by program units or by functions. A program unit retention schedule, sometimes described as an activity-oriented or departmental retention schedule, identifies record series that are maintained by individual departments, divisions, or other organizational units. A functional retention schedule categorizes record series by the business functions—such as accounting, procurement, human resources, legal, or facilities—with which the records are associated without regard to the specific departments or other program units that maintain the records. Program unit retention schedules are most commonly implemented in small and medium-size organizations that operate in a single location and are unlikely to change their organizational structures. Functional retention schedules are widely encountered in large organizations, especially where consolidations, mergers, acquisitions, divestitures, or other developments may realign or eliminate program units. Functional retention schedules have also been adopted by multi-national organizations that maintain records in various geographical locations that differ in their departmental structures.

Whether it is organized by program units or business functions, a traditional retention schedule provides a detailed enumeration—sometimes described as a granular listing—of record series with specific disposition instructions. Each record series is assigned a numeric or alphanumeric record code as a unique identifier. Following a well-established practice described in records management textbooks, the record series are often identified by conducting an inventory that captures information about the characteristics and business purpose of records maintained by all or part of an organization. The inventory’s findings are transposed, with some editing, into a retention schedule. Depending on the circumstances, a traditional functional retention schedule or a compilation of program unit schedules may list hundreds or even thousands of record series, and it may specify a variety of retention periods for records

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<sup>1</sup> As defined in 36 CFR 1220.18, record series “relate to a particular subject or function, result from the same activity, document a specific kind of transaction, take a particular physical form, or have some other relationship arising out of their creation, receipt, or use.”

<https://www.law.cornell.edu/cfr/text/36/1220.18>. Definitions presented in other sources contain the same points.

associated with a given business function or program unit. When a new record series is created or a previously overlooked record series is discovered, it is added to the appropriate functional section or program unit schedule.

A big bucket retention schedule groups records in broad categories that correspond to an organization's major activities, business functions, or work processes. Each category (bucket) is assigned a record code. In this respect, a big bucket schedule resembles a functional retention schedule, but it does not provide a detailed enumeration of record series associated with specific categories. Individual record series are cited as examples within each category, but the examples are typically illustrative rather than comprehensive. Unlike a traditional retention schedule, which may specify different retention periods for individual record series associated with a given business function, the records included in a big bucket category have identical or similar retention requirements, and a uniform retention period is applied to the entire category. The retention period is based on the longest retention requirement for any record series covered by the category.

As an example, a traditional program unit schedule for an accounting department or the accounting section of a traditional functional schedule might list a dozen or more record series and retention periods including:

ACC001	General ledger – 10 years
ACC002	Subsidiary ledgers and journals – 7 years
ACC003	Balance sheets – 7 years
ACC004	Profit and loss statements – 7 years
ACC005	Bank account statements – 7 years
ACC006	Canceled checks – 7 years
ACC007	Fiscal audit records – 10 years

Taking an even more granular approach, separate program unit schedules or functional sections might be created for specific aspects of an organization's accounting operations with a detailed listing of record series for each. For example:

### General Accounting

GAC001	General ledger – 10 years
GAC002	Chart of accounts – 10 years
GAC003	Cash management ledger – 7 years
GAC004	Fixed asset ledger – 7 years
GAC005	Trial balances – 7 years

### Banking

BNK001	Bank account statements – 7 years
BNK002	Canceled checks – 7 years
BNK003	Voided checks – 7 years
BNK004	Wire transfers – 7 years
BNK005	Deposit slips – 7 years

### Fiscal Audit

AUD001	Audit schedules – 7 years
AUD002	External audit reports – 10 years
AUD003	Internal audit reports – 10 years
AUD004	Internal audit work papers – 10 years
AUD005	Audit responses – 10 years

In a big bucket schedule, these accounting-related record series would be aggregated in a single category with a uniform retention period equal to the longest retention period for any record series in the category. For example:

### ACC Accounting Records – 10 years

Description: Records related to general accounting, banking, and fiscal audits

Examples:

Accounting ledgers

Bank account statements

Canceled checks

Audit reports and work papers

In a big bucket schedule, retention periods are assigned at the category level rather than the series level. The records covered by a big bucket category are usually described at a high-level of abstraction with selected record series listed as examples to provide greater specificity. The list of examples must be long enough to adequately convey the scope of the big bucket category so users can reliably determine whether the category applies to specific records in their custody or under their supervisory control.

Similarly, a traditional program unit schedule for an accounts payables department or the accounts payable section of a traditional functional schedule might list the following record series and retention periods:

PAY001	Invoices – 7 years
PAY002	Payment vouchers and authorizations – 7 years
PAY003	Automated Clearinghouse House transactions – 3 years
PAY004	Payments log – 7 years
PAY005	Voucher log – 7 years
PAY006	Supplier payment history report – 3 years
PAY007	Unpaid invoice report – 3 years

Taking a big bucket approach, these record series could be aggregated in a single accounts payable category with its own record code and a uniform retention period of 7 years. As noted above, the scope of the accounts payable category would be described at a high-level of abstraction—records related to payment transactions for goods and services, for example. Selected record series might be listed to indicate the types of records covered by the accounts payable category.

Carrying big bucket aggregation a step further, the accounting and payments records listed above could be combined in a single category with a uniform retention period for all fiscal records. That category might also include accounts receivable records, budget records, bad debt records, investment records, unclaimed property records, and other records associated with an organization’s financial operations and activities. A traditional program unit or functional

schedule might list dozens of record series related to fiscal matters. The big bucket schedule would list a subset of those record series as representative examples. Following the big bucket concept, the retention period for the entire fiscal category would be based on the longest retention requirement for any record series covered by the category.

In addition to aggregating record series, a big bucket schedule also aggregates retention periods. Some traditional retention schedules utilize the full range of possible retention periods from 1 year to 10 years or even beyond. The traditional schedule developer typically selects the shortest period of time that satisfies legal and operational requirements for a given record series. The same program unit schedule or functional schedule category may specify a 5-year retention period for some record series and a 6-year or 7-year retention period for others. By combining record series with a uniform retention period based on the longest requirement, a big bucket schedule eliminates these relatively small variations.

To further simplify development and implementation, a big bucket schedule may limit retention choices for non-permanent records to a few time periods—3 years, 10 years, and permanent, for example—that are suitable for a broad range of records. A 3-year retention period, for example, might apply to general business correspondence, records for job applicants not hired, maintenance work orders, vehicle usage records, visitor logs, customer complaints, help desk records, and other records of short-term value. The 10-year category might include financial records, sales tax records, excise tax records, unemployment tax records, customs records, employee time and attendance records, security incident records, manufacturing production and quality assurance records, and other records that are subject to regulatory requirements or that are likely to be consulted when questions arise about specific events, operations, or activities that occurred in the past. Permanent retention would be reserved for records with long-term operational or historical value, such as business formation records, annual reports, corporate meeting minutes and resolutions, intellectual property records, certain research and development records, and as-built drawings for buildings that an organization owns or occupies. This standardization of retention periods is not unique to big bucket retention. A traditional granular schedule might also limit the variety of retention periods that can be specified for a given record series.



In a variation of the big bucket concept, retention categories are based on time periods rather than business functions. As an example, a big bucket schedule might have just two retention categories—a non-permanent bucket with a uniform retention period and a permanent bucket. The retention schedule will include a comprehensive list of record series to be included in each category. The uniform retention period for records included in the non-permanent bucket might be 7 years, 10 years, or some other number that satisfies an organization’s legal and operational requirements for all records included in the bucket. Records not listed in the permanent or non-permanent category can be discarded when no longer needed, but they are not to be retained longer than retention period specified for the non-permanent category. Alternatively, the schedule might provide a permanent bucket and two non-permanent buckets with retention periods of 3 years and 10 years, for example. The schedule would list records covered by the 10-year and permanent buckets, with all other records being assigned to the 3-year bucket by default. This approach to big bucket retention appears to be best suited to a defined subset of an organization’s records—email, for example, or records related to a specific project or activity.

## **Historical Survey and Literature Review**

Like many records management concepts, the big bucket approach to retention scheduling was initially developed in and implemented by the federal government to address problems associated with traditional record retention methodologies. A 2001 report prepared for the National Archives and Records Administration (NARA) by SRA International, a consulting firm, cited significant issues and concerns related to the correctness, completeness, and effectiveness of retention schedules used by federal agencies.<sup>2</sup> Characterizing retention scheduling as “clearly . . . a problem area,” the report noted that scheduling concepts were poorly understood by federal employees; that many significant records, including most electronic records, were unscheduled; that some significant records were improperly scheduled; and that

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<sup>2</sup> SRA International, *Report on Current Recordkeeping Practices within the Federal Government* (Arlington, VA: SRA International, December 10, 2001).

<https://www.archives.gov/files/records-mgmt/faqs/pdf/report-on-recordkeeping-practices.pdf>

some agency retention schedules were out of date.

Section 207(e) of the E-Government Act of 2002 directed the Archivist of the United States to issue policies to ensure that recordkeeping requirements outlined in 44 U.S. Code Chapters 21, 25, 27, 29, and 31 are applied effectively to electronic records maintained by federal agencies.<sup>3</sup> In a 2003 document,<sup>4</sup> NARA outlined its strategy for redesigning federal records management to address challenges posed by electronic recordkeeping, the proliferation of email, reductions in program staff allocated to filing agency records, and other technological and administrative developments. Among tactics to carry out the strategy, NARA announced an improved approach to record retention, including “flexible scheduling” to allow agencies to schedule records “at any level of aggregation that meets their business needs.”

NARA repeated this idea in a 2004 report that acknowledged issues and concerns raised by SRI International. The report used the phrase “big buckets” to refer to “the application of appraisal criteria to multiple similar or related groupings of information across one or multiple

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<sup>3</sup> Public Law 107-347, E-Government Act of 2002, December 17, 2002.

<https://www.gpo.gov/fdsys/pkg/PLAW-107publ347/content-detail.html>. Guidance for implementing Section 207(e) of the E-Government Act is presented in NARA Bulletin 2006-02 (December 15, 2005) <https://www.archives.gov/records-mgmt/bulletins/2006/2006-02.html>; NARA Bulletin 2008-03 (March 6, 2008), <https://www.archives.gov/records-mgmt/bulletins/2008/2008-03.html>; and NARA Bulletin 2010-02 (February 5, 2010), <https://www.archives.gov/records-mgmt/bulletins/2010/2010-02.html>, which supersedes the 2005 and 2008 bulletins and includes techniques for scheduling agency electronic records systems. While it does not mention big bucket retention, NARA Bulletin 2010-02 advises federal agencies to consider flexible scheduling, which is closely associated with the big bucket approach in other NARA bulletins.

<sup>4</sup> NARA’s Strategic Directions for Federal Records Management, July 31, 2003.

<https://www.archives.gov/files/records-mgmt/faqs/pdf/strategic-directions.pdf>

agencies to establish a uniform retention period.”<sup>5</sup> The 2004 report also introduced the concept of “retention bands”—disposition instructions that include minimum and maximum retention periods rather than absolute retention periods. It noted that retention bands can be combined with a big bucket approach to give federal agencies greater flexibility in developing retention schedules. A NARA glossary, first posted on the Archives web site in late 2004, defines a big bucket schedule more fully as “a type of flexible schedule in which disposition instructions are applied against a body of records that are grouped at a level aggregation greater than the traditional file series/electronic system and that can be organized along a specific program area, functional line, or business process.”<sup>6</sup>

A series of NARA Bulletins issued between 2005 and 2010<sup>7</sup> provided more detailed guidance about big bucket schedules, which NARA also characterized as “large aggregation flexible schedules.” These bulletins outlined the advantages of big bucket schedules and advised federal agencies about the retention scenarios for which they are suitable. The bulletins also listed situations in which the big bucket approach may be inadvisable. A 2010 NARA FAQ

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<sup>5</sup> Strategic Directions: Flexible Scheduling, January 2004. <https://www.archives.gov/records-mgmt/initiatives/flexible-scheduling.html>. Referring to the NARA strategy document, Richard Pearces-Moses, *A Glossary of Archives and Records Terminology* (Chicago: Society of American Archivists, 2005), 48 defines big buckets as “the application of appraisal criteria to related groups of information, usually based on function, to establish a uniform retention period.” A note to the definition states that the big bucket approach “deemphasizes the importance of series.” A copy of the glossary can be downloaded at <https://www2.archivists.org/glossary>

<sup>6</sup> NARA Records Management Key Terms and Acronyms.

<https://www.archives.gov/files/records-mgmt/rm-glossary-of-terms.pdf>

<sup>7</sup> NARA Bulletin No. 2005-05 (April 20, 2005) <https://www.archives.gov/records-mgmt/bulletins/2005/2005-05.html>; NARA Bulletin 2008-04 (April 30, 2008) <https://www.archives.gov/records-mgmt/bulletins/2008/2008-04.html>; NARA Bulletin 2010-03 (May 3, 2010) <https://www.archives.gov/records-mgmt/bulletins/2010/2010-03.html>.

publication<sup>8</sup> provided answers to frequently asked questions about flexible scheduling and provided more detailed information about the characteristics, benefits, and limitations of the big bucket approach to record retention. It also outlined steps involved in the development and implementation of media-neutral big bucket schedules and provided examples that contrasted the traditional and big bucket approach for specific records. The NARA FAQ publication noted that big bucket and traditional approaches can be combined, but a retention schedule is properly characterized as big bucket if the aggregated approach dominates.

The NARA reports and bulletins cited above were designed to guide federal agencies, the earliest adopters of the big bucket concept. In what appears to be the first published reference to the big bucket approach to record retention, Marcus<sup>9</sup> described a NARA pilot project that used a records management application with auto-classification functionality to organize records within a granular file plan, noting that “it soon became evident that filing into a large number of small buckets was extremely cumbersome.” To improve performance, the file plan was revised to reduce the number of buckets that were too general in nature — “a few big buckets versus many small buckets.” Among the first reports of an operational big bucket implementation, Sprehe and McClure<sup>10</sup> described a simplified file plan at the General Accountability Office that grouped

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<sup>8</sup> Flexible Scheduling FAQ (May 3, 2010) <https://www.archives.gov/records-mgmt/faqs/flexible-scheduling.html>

<sup>9</sup> Richard W. Marcus, “NARA: A Sneak Preview,” *Information Management Journal* 36, no. 2 (March/April 2002): 56-57. Carl Frappaolo, “Ten Basics of Electronic Document Management,” *Managing Office Technology* 41, no. 6, (June 1996): 39 appears to be the first publication to use the phrase “big buckets” in a records management context. He uses “big bucket syndrome” to refer to the practice of saving electronic records in a repository without regard to retention or purging of obsolete records. For a similar usage of “big buckets” in the context of storage capacity rather than retention issues, see Lawrence W. Serewicz, “Do We Need Bigger Buckets or Better Search Engines? The Challenge of Unlimited Storage and Semantic Web Search for Records Management,” *Records Management Journal* 20, no. 2 (2010): 172-181.

<sup>10</sup> J. Timothy Sprehe and Charles R. McClure, “Lifting the Burden,” *Information Management Journal* 39, no. 4 (July/August 2005): 47-48, 50-51.

agency records into three broad buckets, each divided into functions, as well as a big bucket installation at the Office of the Comptroller of the Currency.

A 2007 report by NARA's National Records Management Program<sup>11</sup> described big bucket implementation initiatives in several federal agencies, which were identified pseudonymously. In a 2008 report,<sup>12</sup> the National Records Management Program surveyed flexible scheduling implementations in federal agencies, including the Bureau of Land Management, the Department of the Army, the National Aeronautics and Space Administration, the National Park Service, the U.S. Forest Service, the U.S. Fish and Wildlife Service, and the U.S. Patent and Trademark Office. Most of these implementations employed big bucket retention concepts. Examples of federal agencies that have made their big bucket schedules available to the public via their web sites include the National Aeronautics and Space Administration,<sup>13</sup> Chairman of the Joint Chiefs of Staff,<sup>14</sup> Bonneville Power Administration,<sup>15</sup> National

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<sup>11</sup> *A Survey of Federal Agency Records Management Applications* (Washington, D.C.: National Records Management Program, National Archives and Records Administration, 2008).

<https://www.archives.gov/files/records-mgmt/resources/rma-study-07.pdf>

<sup>12</sup> *A Report on Flexible Schedule Implementation by Federal Agencies* (Washington, D.C.: National Records Management Program, National Archives and Records Administration, 2008).

<https://www.archives.gov/files/records-mgmt/resources/flexible-sched-study.pdf>

<sup>13</sup> NASA Records Retention Schedules, NRRS 1441.1 (May 7, 2014).

<https://www.nasa.gov/content/nasa-records-management>

<sup>14</sup> Chairman of the Joint Chiefs of Staff Manual, Joint Staff and Combatant Command Records Management Manual: Volume II-Disposition Schedule (13 July 2012)

<http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.451.1890&rep=rep1&type=pdf>

<sup>15</sup> Bonneville Power Administration, BPA Policy 236-11, Information Lifecycle Management

<https://pdfs.semanticscholar.org/13e3/fcac85fbfb4a1850540ad45111971b81b566.pdf>

Interagency Fire Center,<sup>16</sup> National Institutes of Health,<sup>17</sup> Federal Trade Commission,<sup>18</sup> U.S. Geological Survey,<sup>19</sup> and Centers for Medicare & Medicaid Services.<sup>20</sup> Lownsberry et al.<sup>21</sup> discuss a big bucket model for records maintained Lawrence Livermore National Laboratory, Sandia National Laboratories, and Los Alamos National Laboratory.

By the mid-2000s, interest in big bucket schedules had spread to the broader records management community. Arguing that “little buckets are no longer effective and may even alienate an already overburdened user community,” Kersey<sup>22</sup> noted that “records managers are strategizing how to bring a thousand ‘buckets’ down to a hundred (or fewer).” While not using the phrase “big buckets,” Torres<sup>23</sup> described a scheduling approach based on a small number of broadly defined record series related to an organization’s core business processes and sub-

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<sup>16</sup> Wildland Fire Incident Records Retention Guidance (April 2016).

<https://www.nwcg.gov/sites/default/files/committee/docs/ipsc-retention-guidance-ref-sheet.pdf>

<sup>17</sup> NIH Intramural and Extramural Research Records Schedule

<https://oma.od.nih.gov/DMS/Pages/Records-Management-Schedule.aspx>

<sup>18</sup> Schedule 1: FTC Administrative Records and Schedule 2: FTC Mission Records

[https://www.archives.gov/files/records-mgmt/rcs/schedules/independent-agencies/rg-0122/n1-122-09-001\\_sf115.pdf](https://www.archives.gov/files/records-mgmt/rcs/schedules/independent-agencies/rg-0122/n1-122-09-001_sf115.pdf)

<sup>19</sup> U.S. Geological Survey: Geology Discipline Research Records Schedule

<https://www2.usgs.gov/usgs-manual/schedule/432-1-s5/gd.html#sked>

<sup>20</sup> CMS Records Schedule. <https://www.cms.gov/Regulations-and-Guidance/Guidance/CMSRecordsSchedule/>

<sup>21</sup> Bruce Lownsberry et al., *A Tri-Lab Programmatic Model for Nuclear Weapons Records Retention*, LLNL-TR-726072 (Livermore, CA: Lawrence Livermore National Laboratory, Feb 25, 2013). <https://e-reports-ext.llnl.gov/pdf/726072.pdf>

<sup>22</sup> Michele Kersey, “Content Volume and Records Management,” *KM World* 14, no. 8 (September 2005): S4-S5.

<sup>23</sup> Tina Torres, “Creating a Process-Focused Retention Schedule,” *Information Management Journal* 40, no. 5 (September/October 2006): 62-4, 66, 69.

processes. Contending that record retention is “broken,” Kahn<sup>24</sup> suggested that records managers work with information technology and legal staff to create higher-level buckets of records that have the same retention periods. In a discussion of fines imposed on financial services firms for failure to promptly produce emails required for legal proceedings, Sausner<sup>25</sup> suggested a big bucket approach to retention of email but noted that manual tagging of messages by employees requires training and motivation. Allman<sup>26</sup> proposed a big bucket approach as an interim solution to retention of email but conceded that it merely postpones the more formal identification of messages that need to be kept. A Sedona Conference Working Group characterized the big bucket approach as a “highly simplified” type of retention schedule for email.<sup>27</sup>

In an influential 2007 white paper issued by Iron Mountain, Cisco and Ashley<sup>28</sup> reported that most records management subject experts who responded to a survey agreed that reducing the number of retention categories could have significant benefits. In particular, most respondents thought that a schedule with fewer retention buckets would lead to better record retention classification by improving an end-user’s ability to apply retention requirements accurately and consistently. On the other hand, some respondents noted that organizations must

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<sup>24</sup> Randolph A. Kahn, “The Risk-Cost Retention Model: a New Approach to Records Retention,” *Information Management Journal* 40, no. 3 (May/June 2006): 47-48-50, 52-54.

<sup>25</sup> Rebecca Sausner, “Banks’ New Quandary: Retain or Destroy?,” *U.S. Banker* 116, no. 10 (October 2006): 18.

<sup>26</sup> Thomas Y. Allman, “Email Retention: Time for a New Approach,” *AIIM E-Doc Magazine* 19, no. 5 (September/October 2005): 49-51.

<sup>27</sup> The Sedona Conference Working Group on Electronic Document Retention and Production, eMail Management and Archiving Special Team, “The Sedona Conference Commentary on Email Management: Guidelines for the Selection of Retention Policy,” *The Sedona Conference Journal* 8 (Fall, 2007): 243.

<sup>28</sup> Susan Cisco and Lori J. Ashley, *Streamlining Retention Schedules: The Benefits of Big Buckets*. (Boston, MA: Iron Mountain, 2007).

<https://static1.squarespace.com/static/52ebbb45e4b06f07f8bb62bd/t/533f1b32e4b0ba34df9c6161/1396644658462/Big+Buckets+White+Paper+US-RM-WP-092707-001.pdf>

weigh the benefits of proper classification against the risk of retaining records longer than necessary when retention periods are rounded up to the longest requirement for any record series in a given bucket. The report included brief case studies that discussed the issues and advantages of aggregated retention scheduling in four organizations: the Government Accountability Office, the U.S. Patent and Trademark Office, the Federal Home Loan Mortgage Corporation (Freddie Mac), and Cargill, Incorporated.

In the same year, a survey of records and information management professionals conducted by Cohasset Associates<sup>29</sup> in co-sponsorship with ARMA International and AIIM found that 64 percent of respondents agreed that the big bucket approach, defined as “significantly fewer records categories containing a broader spectrum of current record series,” is the best way to meet the challenge of classifying large daily volumes of electronic records. The Cohasset report cited these responses as clear recognition of significant problems associated with the application of traditional retention concepts to electronic records.

On the Records Management Listserv,<sup>30</sup> interest in big bucket retention was at its height in 2007 when 87 postings, many of them expressing strong opinions, had the word “bucket” in the subject line. Some of the postings advocated the big bucket approach as an effective solution to problems associated with traditional retention schedules while others cautioned against it, noting the negative impact of over-retention on storage costs and discovery as a significant concern. Skeptical commentators warned that the big bucket concept was untested and that granular retention schedules remain preferable for records that are subject to regulatory requirements with event-driven retention periods. In a 2008 report funded by the ARMA

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<sup>29</sup> Robert F. Williams and Lori J. Ashley, *Electronic Records Management Survey 2007: Call for Collaboration*. (Chicago: Cohasset Associates, 2007).

<http://www.cohasset.com/retrievePDF.php?id=1>

<sup>30</sup> <https://lists.ufl.edu/cgi-bin/wa?A0=RECMGMT-L>. To replicate the search, select “Search Archives” from the home page, then enter “bucket” in the “Subject Contains” field.



International Educational Foundation, Galloway<sup>31</sup> characterized big buckets as a solution in search of a problem. In the same year, articles by Cisco,<sup>32</sup> Montana,<sup>33</sup> Miller,<sup>34</sup> and DeSilva and Vednere<sup>35</sup> took a more positive view. They explained the big bucket approach and discussed the practical advantages associated with consolidation of retention series—in particular, the increased likelihood that users will correctly classify for retention if they are given fewer choices, simplified user training, and easier review and revision of retention schedules to incorporate new record series. They also reviewed the counter-arguments, especially the possibility of keeping some records, including personal data, longer than necessary and complications posed by event-driven retention requirements. Diamond and Foskett<sup>36</sup> advocated broad buckets as a practical approach to retention of electronic records. A number of Listserv postings also addressed this point, noting that traditional granular schedules pose significant impediments to automated retention of electronic records.

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<sup>31</sup> Patricia Galloway, *Big Buckets or Big Ideas? Classification vs. Innovation on the Enterprise 2.0 Desktop*. (Pittsburgh, PA: ARMA International Educational Foundation, 2008), 8.

<http://armaedfoundation.org/wp-content/uploads/2016/12/BBpaper30.pdf>

<sup>32</sup> Susan Cisco, “How to Win the Compliance Battle Using ‘Big Buckets,’” *Information Management Journal* 42, no. 4, (July/August 2008): 30-38; Susan Cisco, “Big Buckets for Simplifying Records Retention Schedules,” *Information Management Journal* 42, no. 5 (September/October 2008): 3-6.

<sup>33</sup> John Montana, “Legal Implications for Using Big Buckets,” *Information Management Journal* 42, no. 5 (September/October 2008): 13-15.

<sup>34</sup> Bruce Miller, “Strategies for Improving Electronic Recordkeeping Performance,” *Information Management Journal* 42, no. 5 (September/October 2008): 8-10.

<sup>35</sup> Nishan DeSilva and Ganesh Vednere, “The Foundation for Sound Records Management,” *AIIM E-Doc Magazine* 22, no. 3 (May/June 2008): 26-31. See also, Nishan DeSilva and Ganesh Vednere, “Lessons from the Trenches: Successful Records Management Implementation: Key Lifecycle Steps,” *AIIM E-Doc Magazine* 22 no. 1 (January/February 2008): 34-38.

<sup>36</sup> Mark Diamond and Stephen Foskett, “Does Records Management (and do Records Managers) Matter?” *AIIM E-Doc Magazine* 22, no. 2 (March/April 2008): 14.

Biannual follow-ups to the Cohasset survey indicated strong interest in big bucket retention as a practical solution to the growing problem of electronic recordkeeping. Like its 2007 predecessor, the 2009 survey found that two-thirds of the respondents considered big buckets the preferred approach to meet the challenge of classifying large daily volumes of electronic records.<sup>37</sup> While Cohasset's 2011/2012 survey did not use the phrase "big buckets," 40 percent of respondents listed fewer categories as a desired improvement in their organizations' retention schedules.<sup>38</sup> The 2013/2014 survey confirmed a continued trend toward aggregation of record series by respondents with the largest retention schedules. Respondents whose retention schedules had more than 250 record series decreased from 43 percent in 2007 to 37 percent in 2013, but retention schedules with 100 or fewer record series remained the same at 31 percent.<sup>39</sup> In the 2016/2017 survey,<sup>40</sup> most respondents indicated an intention to implement schedules with fewer retention categories that can be applied to broad sets of information. The number of respondents who reported retention schedules with more than 250 record series fell to 27 percent, and those with fewer than 100 record series rose to 34 percent.

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<sup>37</sup> Lori J. Ashley and Robert F. Williams, *2009 Electronic Records Management Survey: Call for Sustainable Capabilities*. (Chicago: Cohasset Associates, 2009).

<http://www.cohasset.com/retrievePDF.php?id=10>.

<sup>38</sup> Robert F. Williams et al., *Cohasset/ARMA 2011/2012 Survey Results, Records Management and Governance of Electronically Stored Information (ESI): Call for Action that Manifests Reasonableness and Good Faith*. (Chicago: Cohasset Associates, 2012).

<http://www.cohasset.com/retrievePDF.php?id=14>. This survey was co-sponsored by ARMA International.

<sup>39</sup> Carol Stainbrook et al., *Cohasset/ARMA/AIIM 2013/2014 Information Governance Benchmarking Survey: A Call for Modernization*. (Chicago: Cohasset Associates, 2014).

<http://www.cohasset.com/retrievePDF.php?id=17>. This survey was co-sponsored by ARMA International and AIIM.

<sup>40</sup> Cohasset Associates, *Cohasset/ARMA 2016/2017 Information Governance Benchmarking Survey: Transforming Information Management*. (Chicago: Cohasset Associates, 2017).

<http://www.cohasset.com/retrievePDF.php?id=28> This survey was co-sponsored by ARMA International.

As the big bucket concept gained exposure and greater acceptance as an effective alternative to traditional retention methodologies, notoriety diminished. The number of listserv postings that contained the word “bucket” in the subject line declined sharply to 28 in 2008 and even more dramatically in subsequent years. From 2009 to 2013, there were never more than 9 postings in a given year. There was just 1 posting in 2014 and 2 postings in 2016. In 2015, there were none at all. In 2017, there were only 2 postings—the ARMA International Educational Foundation’s request for proposals for the research project that led to this report and the author’s request for contact with records managers who have developed a big bucket schedule. A 2013 survey of records management decision makers by ARMA International and Forrester Research found that the trend toward big bucket retention appeared to be “reversing itself” as 22 percent of respondents reported more than 150 “retention policies” while 34 percent reported fewer than 10; in the 2011 ARMA/Forrester survey, 50 percent of respondents had reported fewer than 10 policies and only 1 percent had more than 150.<sup>41</sup>

Big bucket concepts are routinely mentioned, however briefly, in records management textbooks,<sup>42</sup> and articles dealing with big bucket retention continue to be published occasionally in professional journals. For the most part, these books and articles reiterate the benefits and

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<sup>41</sup> Cheryl McKinnon, “Propelling the Profession (and the Professional) to the Next Level,” *Information Management* 47, no. 5 (September/October, 2013): 20-22, 24-25, 47. While this article does not define “retention policies,” it appears to be equated with record series and their associated retention periods. Recommending that organizations limit the number of distinct retention policies, a 2011 Forrester report noted that “it is simply not realistic to expect broad sets of employees to navigate extensive classification options while referring to records schedules that may weigh in at more than 100 pages.” See, Brian Hill, “RM Tech Deployment Still a Rough Road,” *Information Management* 45, no. 5 (September/October 2011), 42-44, 46-47, 54.

<sup>42</sup> Examples include William Saffady, *Records and Information Management: Fundamentals of Professional Practice, Third Edition* (Overland Park, KS: ARMA International), 69-70 and Patricia C. Franks, *Records and Information Management* (Chicago: Neil-Schuman, 2013), 103-105.

concerns noted in earlier publications. Douglas<sup>43</sup> described big bucket retention as a modern initiative that makes records management “less onerous.” McLeod<sup>44</sup> characterized the big bucket approach as “an example of applying principles but adapting practice.” In a discussion of the elements of effective records management and information governance programs, Diers<sup>45</sup> stated that lengthy, complicated retention schedules are obsolete. Trombley<sup>46</sup> noted the difficulty of defining a uniform triggering event for big bucket schedules. Seymour<sup>47</sup> characterized big bucket retention as “a modern compromise between adequacy and efficiency when faced with overwhelming volume.” Snyder<sup>48</sup> advised in-house legal departments to re-think and simplify retention schedules that have too many buckets.

Among publications outside of North America, Lomas,<sup>49</sup> writing about information security and access in the United Kingdom, briefly mentioned big bucket retention as a “new

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<sup>43</sup> Marcia Douglas, “Governance for Successfully Implementing SharePoint,” *Information Management* 44, no. 2 (March/Apr 2010): HT5-HT-8, 43.

<sup>44</sup> Julie McLeod, “On Being part of the Solution, not the Problem,” *Records Management Journal* 22, no. 3 (2012): 186-97.

<sup>45</sup> Fred Diers, “In Search of an Effective RIM or IG Program,” *Information Management* 50, no. 2 (March/April 2016): 34-37, 47.

<sup>46</sup> Sue Trombley, “Beat the Clock in the Event-Based Retention Countdown,” *Information Management* 50, no. 5 (September/October 2016): 27-29, 47.

<sup>47</sup> Jennifer Seymour, “The Modern Records Management Program: an Overview of Electronic Records Management Standards,” *Bulletin of the Association for Information Science and Technology* 43, no. 2 (December/January 2017): 35-39

<sup>48</sup> Snyder, H. Kirke, “Five Steps In-House Counsel Should Take to Mitigate Information Risk,” *Information Management* 50, no. 4 (July/Aug 2016): 24-27, 47.

<sup>49</sup> Elizabeth Lomas, “Information Governance: Information Security and Access within a UK Context,” *Records Management Journal* 20, no. 2 (2010): 182-98.

approach.” Tanimu et al.<sup>50</sup> reviewed the big bucket approach from a Nigerian perspective. Wang’ombe and Kibati<sup>51</sup> advocated the use of big bucket scheduling for financial records maintained by county government in Kenya. Discussing an aggregated retention schedule developed by the National Archives of Australia, Joseph et al.<sup>52</sup> noted that the big bucket approach poses challenges where laws and regulations require varied retention periods. The Australian schedule, known as AFDA Express, is a streamlined version of the Administrative Functions Disposal Authority (AFDA) that merged record classes related to similar activities into one record class with an equal or longer retention period.<sup>53</sup> Other Australian commentators include Fryer<sup>54</sup> and Foley.<sup>55</sup> Kyobe et al.<sup>56</sup> briefly mentioned big bucket versus small bucket theories for electronic records management in a South African university.

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<sup>50</sup> Hussaina Tanimu et al., “Big bucket Records Retention Theory as a Framework for Understanding Record Retention in Non-Profit Organizations,” *IOSR Journal of Humanities and Social Sciences* 21, no. 8 (August 2016): 33-38.

<sup>51</sup> J.M. Wang’ombe and P. Kibati, “Analysis of Financial Management Practices on Effective Use of Public Funds in the County Government of Nakuru, Kenya.” *International Journal of Economics, Commerce and Management* 4, no. 4 (April 2016): 1197-1223.

<sup>52</sup> Pauline Joseph et al., “Paradigm Shifts in Recordkeeping Responsibilities: Implications for ISO 15489’s Implementation,” *Records Management Journal* 22, no. 1 (2012): 57-75.

<sup>53</sup> AFDA Express, which reduced the number of record classes to 89 from 1,068 in the full AFDA, is online at [http://www.naa.gov.au/images/afdaexpress\\_tcm16-47393.pdf](http://www.naa.gov.au/images/afdaexpress_tcm16-47393.pdf)

<sup>54</sup> Johnathan Fryer, “Records Management Heresy: Worshipping at the Altar of Getting things Done.” *IQ: the RIM Quarterly* 30, no. 1 (February 2014): 46-51.

<sup>55</sup> Chris Foley, “Digital Hoarding: Perils, Pitfalls and Paradoxes of the Digital Age,” *IQ: the RIM Quarterly* 32, no. 2 (May 2016): 46-52.

<sup>56</sup> M.E. Kyobe et al., “Investigating Electronic Records Management and Compliance with Regulatory Requirements in a South African University,” *SA Journal of Information Management* 11, no. 1 (March 2009): 1-15.

## Interview Process

To determine the current status of big bucket retention initiatives, the author conducted telephone interviews with records managers who have transformed their existing retention schedules using big bucket concepts or have developed a new big bucket retention schedule from scratch. To identify potential interviewees, the author posted a brief notice on the Records Management Listserv and on the LinkedIn Next Generation Records Management Group explaining the project and asking to be contacted by records managers who have developed a big bucket retention schedule or are in the process of doing so. The author sent respondents a more detailed description of the project and the interview process. Ultimately, 14 records and information management professionals agreed to participate in telephone interviews to discuss their experience with big bucket retention.

This is not a scientific study with a statistically balanced sample of participants. The interviewees were self-identified and self-selected, but they do represent important segments of the records management community:

- Seven interviewees reported on big bucket retention initiatives in for-profit companies.
- One interviewee reported on a big bucket retention initiative in a not-for-profit organization.
- Six interviewees discussed the development and implementation of big bucket retention schedules in government agencies—two in federal agencies, three in state government (including one in a state university system), and two in local government.
- Because some interviewees described their experience with big bucket retention in both current and previous employment, the number of organizations represented was greater than 14.
- Eleven interviewees were based in the United States, although four of the private sector interviewees worked for companies with international operations. Two interviewees were based in Canada and one interviewee worked in the United Kingdom.
- Most interviewees reported that their big bucket retention schedules were developed in-house by the interviewees themselves or by a records management team or committee

formed for that purpose. Two interviewees reported that their big bucket schedules were developed by records management consultants, one of whom participated in an interview. In three organizations, big bucket schedules were developed in-house to replace traditional granular schedules that were originally developed by records management consultants. One interviewee reported using a records management consultant to perform legal research for a big bucket schedule that was otherwise developed in-house.

- When asked how they learned about the big bucket approach, most interviewees cited articles in records management publications, including some of the titles cited in the previous section of this report, as well as presentations at records management meetings and conferences. Several interviewees indicated that they were introduced to big bucket retention concepts in a previous job. Two interviewees learned about big bucket retention from course readings in graduate school courses.

The interviews took place between late January and early March 2018. Most interviews lasted 35 to 45 minutes. To prepare for the interviews, the author performed background research to obtain information about each interviewee's organization and, where available, the interviewee's records management background. For interviewees in government agencies, retention schedules posted on public web sites were examined. After each interview was conducted, a written summary of the points discussed was sent to the interviewee to review for comments and corrections. Several interviewees provided clarifications and added details that were not covered during the telephone call. As noted in the introduction to this report, interviewees were assured that they would not be personally identifiable based on their responses to specific questions and that their organizations would not be identified beyond a general description of the type of entity involved.

### **Granular Retention Problems**

Reflecting ideas presented in records management publications and conference presentations, most interviewees viewed the big bucket approach as a modern solution to widely acknowledged problems associated with traditional granular retention schedules in general and with their own existing retention schedules in particular:

- Most of the interviewees adopted the big bucket approach to replace an overly complicated and unwieldy retention schedule that had been in use for some time and was in need of revision. The lone exception, an interviewee in a financial services company, developed a big bucket schedule from scratch. That company had some retention rules focused on compliance with government regulations, but it did not have a record retention schedule and had not destroyed any obsolete records.
- In listing their issues and concerns, interviewees noted that their granular retention schedules were difficult to understand and apply, required time-consuming review and updating, specified inconsistent retention periods for the same types of records maintained by multiple departments, included some obsolete and transient record series, and—despite excessive length—were incomplete. One interviewee reported that the granular schedule did not cover project files, a significant omission in an organization where much work is project-based.
- For these interviewees, a big bucket replacement with simplified retention rules offered an effective alternative to revision of their existing schedules within a granular framework. With fewer record series, interviewees expected a consolidated retention schedule to be easier to administer and update than a traditional granular schedule.
- With fewer record series, interviewees expected a big bucket schedule to make it easier for users to determine the appropriate retention period for a given type of record. One interviewee, a consultant hired to assist a small local government agency that was expected to comply with a complex, highly detailed retention schedule intended for a variety of agencies, noted that the detailed schedule contained numerous “gaps and overlaps” that could be addressed by raising the definition of a record series to a higher level. Another interviewee reported that significant reductions in clerical staff had compromised the effectiveness of a well-organized granular schedule based on a detailed file plan. When the granular schedule was developed, the organization had knowledgeable employees who organized records according to the file plan.
- Most interviewees reported that their granular retention schedules were not consistently implemented. In some organizations, the granular schedule was ignored by users, possibly because the retention rules were too complicated and difficult to apply. Several



interviewees noted that many employees were not even aware that their organization had a retention schedule.

- In some of the participating organizations, big bucket schedules were designed to replace aging and ineffective departmental retention schedules that were developed in the 1980s and early 1990s and were badly in need of revision. In a state agency, a granular departmental retention schedule was last modified in 2014 when minor language changes were made to some record series, but some part of the schedule dated from the late 1990s.
- In a few organizations, a big bucket schedule was designed to replace a relatively new but unacceptable granular schedule. As a newly hired records manager, one interviewee inherited a retention schedule developed in 2014. That schedule was about 50 pages long, poorly organized, incomplete, and provided no rationale for retention periods. In another company, the big bucket schedule was designed to replace a granular schedule developed by a consultant and last updated in 2013.
- Some interviewees reported that their legal department encouraged the big bucket approach, expecting that the resulting schedule would be easy for business units to understand and apply.
- While several interviewees noted that their organizations continue to maintain large quantities of paper records, including some with long retention periods, the proliferation of electronic records was widely cited as a driving factor in adoption of the big bucket approach. All interviewees confirmed that the majority of new records originate in digital form. Most interviewees reported that their organizations had a strong interest in retaining records electronically for improved access and usability, although top management had given little thought to how electronic records would be managed. Several interviewees noted that their information technology departments favored a media-neutral big bucket schedule to simplify retention of electronic records for which granular retention guidance was impractical and consequently ignored.

### **Simplification through Consolidation**

Interviewees reported that their existing granular retention schedules listed hundreds or

even thousands of record series. When asked about the circumstances that led to a big bucket retention initiative, the interviewees cited simplification of retention rules as the principal motive for schedule revision. As a defining characteristic of the big bucket approach, simplification is achieved through consolidation of similar record series associated with specific business operations or activities. All interviewees reported that their big bucket schedules reduced the number of record series, in some cases drastically, when compared to their granular predecessors. For example:

- In an energy company, a granular retention schedule with 175 record types was reduced to 60 buckets with 12 disposition rules—five calendar-based retention periods, six event-based retention periods, and one disposition rule that specified retention for the life of corporation.
- In a medium-size state government agency, the existing granular schedule had 60 record series. A big bucket replacement, which was in development when the interview was conducted, is expected to have just 20 record series.
- In a manufacturing company, granular departmental schedules listed about 500 record series. As initially developed by a records management consulting firm, a big bucket schedule consolidated the departmental schedules into a unified enterprise-wide schedule with 22 major categories and 190 subcategories. The company subsequently hired a different consulting firm to conduct a needs assessment of its electronic recordkeeping practices. In the course of that assessment, the consultants advised the company that further consolidation of subcategories was possible, which reduced the big bucket schedule to 106 record series.
- In a utility company, departmental schedules with more than 1,400 record series were replaced by a big bucket functional schedule with 150 record series. Part of the reduction was achieved by consolidating duplicate record series and eliminating obsolete record series, but many similar series were combined as well.
- In an energy company, a highly detailed granular schedule was consolidated to 30 record series. About 100 record series in the granular schedule were permanent records related to environmental matters. These record series were combined in a single bucket.
- In a multi-campus state university system with hundreds of departments and diverse

business operations, granular retention schedules listed 1,309 record series, some of which had a range of retention periods. A new enterprise-wide schedule, which was nearing completion at the time the interview was conducted, has 19 large buckets with a total of 160 to 170 record series. The buckets correspond to major record categories—payroll, human resources, compliance, public safety, student records, and so on.

- A granular retention schedule that covered state government, local government, state university, and community college records consisted of a general schedule for commonly encountered and agency-specific program schedules with thousands of record series. Its big bucket replacement has 730 record series organized in major buckets that correspond to functional areas.
- In an energy company, a big bucket schedule reduced the number of record series to 50 from 132 in the predecessor granular schedule, but that number was subsequently increased to 53. The new schedule had one bucket for all records associated with facility operations but the retention period for that bucket did not comply with all regulatory requirements for pipeline records, which needed their own record series.

## **Retention Periods**

As an aspect of simplification and consolidation, some big bucket initiatives reduced the variety of retention periods assigned to specific record series by standardizing on selected time periods whenever possible:

- An interviewee in an energy company reported that 3, 7, and 10 years were the most common choices for calendar-based retention periods and 6, 7, and 10 years were the most common choices for event-based retention periods, but longer retention periods were required in a few cases. The big bucket schedule specifies a 3-year maximum retention period for non-records. The schedule includes one bucket for reference materials with indefinite retention and one bucket for third-party-owned data with retention periods determined by contractual provisions.
- In a financial services company, a big bucket schedule established 10 years as the default

retention period, which applied to about 90 percent of the company's records. A small number of exceptions were made for record series that required longer or shorter retention. The company could have established separate retention buckets for records maintained by its U.S., European, and Asian operations, but the 10-year retention bucket covered all jurisdictions with minimal exceptions needed.

- In a federal government agency, a big bucket schedule standardized on 3, 7, 15, and 75 years as the retention periods for non-permanent records. By contrast, the old schedule specified a variety of retention periods for non-permanent records, including 1 year, 2 years, 3 years, 5 years, 6 years, and 30 years. The big bucket schedule specifies minimum retention periods for non-permanent. Departments can keep records longer if necessary.
- A big bucket schedule developed for multiple federal agencies grouped all records into two series—temporary records to be retained for 7 years and permanent records, which will be transferred eventually to the National Archives. The schedule lists records that must be kept permanently. It includes examples of temporary records, which are too numerous to list comprehensively.
- In an energy company, the number of different retention periods specified in the granular schedule were reduced in the big bucket replacement. For records with retention periods between 1 year and 10 years in the granular schedule, the common numbers are 3 years, 7 years, and 10 years. For records that must be kept longer than 10 years, a small number of different retention periods are used.
- In a non-profit organization, the big bucket schedule consolidated multiple record series for case records, which were designated for permanent retention in the predecessor granular schedule. The uniform retention period for case records is “indefinite with 10-year review,” which recognizes that cases involving minors may need to be kept longer than 10 years. An 8-year retention period is applied to most records in the finance section of the big bucket schedule.
- One interviewee reported that, in a previous position in a law firm, most client files were subject to a uniform retention period of 20 years consisting of a first review at the end of 10 years with two possible extensions at 5-year intervals. Exceptions were limited to case files in certain areas, such as criminal law, intellectual property law, and estate planning.
- A big bucket schedule in a utility company did not intentionally reduce the number of

different retention periods in use, but the company only uses certain retention periods—in particular, 5 years, 7 years, 10 years, and 15 years—based on regulatory requirements and business needs.

- Several interviewees noted that reducing the variety of retention periods was considered but rejected as not practical due to regulatory requirements.

Some interviewees wanted to minimize the use of event-based retention periods, which can be difficult to implement in a big bucket context, but they indicated that complete elimination of event-based retention triggers may not be feasible for project records, personnel records, case records, client records, and other record series that need to be retained for some years after termination of the matters to which they pertain. In one company with multi-year projects, records are tagged with indefinite retention to prevent premature destruction while a project is active. When the project becomes inactive, the records are tagged with a definite retention period, which triggers the disposition clock.

### **Implementation Status**

Nine interviewees discussed their experience with big bucket schedules that were fully developed. In most cases, the schedules were completed within the last several years. Five interviewees discussed big bucket schedules that were in development but nearing completion. In some cases, these schedules were being rolled out in sections and had been partially implemented. All of the interviewees indicated that their big bucket schedules were designed to fully replace their granular predecessors. While all interviewees described their big bucket schedules as media-neutral, they have not necessarily been fully implemented for records in all formats:

- Three interviewees reported using electronic document management (ECM) or records management application (RMA) software to manage retention of electronic records. In one company, which has been using records management software for years, official records stored in the records management application are purged when their retention periods elapse, although project files and some other official records are stored separately

on shared drives. One interviewee reported that electronic records are housed in SharePoint, which the company plans to enhance with add-on components for retention functionality.

- In one company, the interviewee reported that the big bucket schedule was fully implemented for paper records. The company was in the process of implementing an electronic content management system to apply the big bucket schedule to electronic records, but the interviewee noted that it had proved easier to develop the retention schedule than to get the information technology unit to focus on implementing it for electronic records.
- Interviewees in global companies indicated that their big bucket initiatives focused on records associated with domestic operations, which established a retention baseline that operations in other countries were expected to follow unless local laws and regulations required longer retention for specific records. In several companies, the interviewees reported that they worked with legal counsel in other countries to ensure that the big bucket schedule meets their needs.
- One interviewee reported that electronic records are saved on a shared drive, which is being cleaned up as part of the implementation process for the big bucket schedule, but most interviewees indicated little progress in applying retention guidance to electronic records saved on shared drives. One interviewee noted retention challenges posed by electronic records saved in SharePoint, OneDrive, and OneNote.
- As noted above, all interviewees indicated that their big bucket schedules were designed to replace granular predecessors. To facilitate the transition to big bucket retention, most of the interviewees developed a crosswalk mechanism, characterized by one interviewee as a “translation matrix,” to match record series from the granular schedule to consolidated series in the big bucket replacement.<sup>57</sup> These crosswalk mechanisms are

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<sup>57</sup> The National Archives and Records Administration requires federal agencies to prepare a crosswalk that maps existing record series to the appropriate bucket items. For examples of crosswalks, see Appendix B at <https://www.archives.gov/records-mgmt/faqs/flexible-scheduling.html>. A crosswalk template is available at <https://www.archives.gov/records-mgmt/scheduling>.

typically intended for users who are familiar with record series in the old schedule and want to be able to locate their counterparts in the new schedule.

- One interviewee reported that she tried to incorporate as many keywords as possible from the granular schedule when preparing descriptions of record series in the big bucket schedule. Another interviewee indicated that the new retention schedule included an index to help users select appropriate buckets for particular records.

### **Over-Retention**

When record series related to the same business function are consolidated, the resulting bucket is assigned the longest retention period associated with any of the aggregated record series. In the process, the retention period for some records may be increased. Those records will be retained longer than necessary to satisfy legal or operational requirements. As previously noted, records management publications and listserv postings have identified this over-retention as a potentially significant problem that increases an organization's storage costs and exposes it to risks associated with discovery and data breaches. When asked about this, the interviewees indicated that it was not an impediment to the big bucket approach in their organizations:

- An interviewee in a manufacturing company reported that no objections were raised about possible over-retention when the big bucket schedule was developed. On the contrary, some engineers objected to reductions in some very long retention periods in the predecessor schedule.
- One interviewee reported that officials in a state government agency raised no objections when they were informed about the possibility of longer retention for some records.
- In a federal agency, a big bucket schedule that consolidated non-permanent records in one series with a 7-year retention period necessarily increased some retention periods, but no one expressed any concerns about over-retention.
- An interviewee in an energy company reported that, rather than objecting to increased retention periods when the big bucket schedule was developed, the legal department appeared to prefer longer retention.

- In the process of consolidating record series, a utility company's big bucket schedule increased the retention periods for some records, but the interviewee reported that there were no complaints about over-retention.
- In a financial services company with global operations, the legal and compliance functions were aware that a 10-year retention period resulted in over-retention, but this was not a concern. A 7-year retention period might have reduced over-retention for the company's domestic operations, but it would have required more exceptions to comply with European and Asian regulations.
- In a utility company, consolidation of record series required increased retention periods for certain types of records, but the interviewee reported that there were no complaints about over-retention. As a working principle, however, the interviewee tried to limit the retention period to twice as long as the regulatory requirement for a given record series.
- Consistency for shared functions across multiple agencies was an important consideration for a big bucket schedule intended for state and local government records. The interviewee reported that this resulted in decreased retention periods for some record series, but some agencies objected to this, indicating that they intended to retain records longer.
- Some interviewees reported that their information technology units raised no objections to over-retention of electronic records maintained on their servers or under their supervisory control.
- Because most of the interviewees worked in U.S. organizations that do not have global operations, they were not concerned with the implications of over-retention for compliance with data protection regulations in EU member states and other countries. Those regulations generally require the destruction of personally identifiable information when the purpose for which the information was originally created or collected is fulfilled.<sup>58</sup> One interviewee noted that the General Data Protection Regulation (GDPR),

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<sup>58</sup> In Canada, the Personal Information Protection and Electronic Documents Act (PIPEDA) incorporates CAN/CSA-Q830-96, *Model Code for the Protection of Personal Information*, which was issued by the Canadian Standards Association, as a supplementary document. That



which had not gone into effect at the time the interview was conducted, may have an impact on retention practices in a financial services company, but the legal department, not records management, has taken the lead on GDPR matters.

## **Training**

All interviewees agreed that initial and ongoing training is an important component of a big bucket retention initiative. The interviewees also agreed that their big bucket retention schedules simplified training when compared to their granular predecessors:

- An interviewee in a state government agency reported that adoption of an enterprise-wide big bucket schedule will eliminate the need for separate training for individual departmental schedules.
- An interviewee in an energy company noted that records management can develop subsets of a big bucket schedule tailored to specific departments. The big bucket schedule is posted on the company's intranet, and the records manager worked with departmental record coordinators to explain the schedule.
- An interviewee in a utility company met with individual departments to introduce the new schedule. She continues to work with departments as needed when questions arise about retention.
- An interviewee in a state university system developed a webinar to introduce the new schedule. The interviewee also made presentations about the schedule and developed additional webinars for specific situations.
- One interviewee developed online tutorials to facilitate rollout of the big bucket schedule.
- In a small local government agency, the big bucket schedule was rolled out with training provided on demand as needed.
- Less optimistically, one interviewee reported that the big bucket schedule was designed to

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standards advises but does not require organizations to develop and implement guidelines with minimum and maximum retention periods for records that contain personal information.

simplify record retention, but it was introduced with limited guidance and no agency-wide training plan. When the new schedule was developed, there was a recognized need for a saturation-type training initiative to effectively implement the schedule, but this was not done.

## **Big Buckets and Email**

Several publications cited earlier in this report discussed the potential of big bucket retention for email. The National Archives and Records Administration's Capstone approach to email management, which was introduced in 2016, is based on big bucket concepts. The email portion of the general retention schedule for federal government agencies provides a permanent retention category for email of senior government officials and two non-permanent retention categories with retention periods of 3 years and 7 years for email of other government employees.<sup>59</sup> When asked about the application of big bucket concepts to retention of email in their organizations, interviewees gave a variety of responses:

- A manufacturing company has three broad retention rules for email: non-essential email is deleted after 90 days; email with business value, which must be tagged by the mailbox owner, is retained for 3 years; email with record status that warrants longer retention must be saved in SharePoint.
- An interviewee in a state government agency indicated that the big bucket schedule does not include a separate category for email. Following the records management policy adopted by state government, email retention is based on the content of a message. Email is not treated as a separate type of record.
- An interviewee in another state agency likewise reported that its big bucket schedule does not provide a special bucket for email. At present, no email is being deleted. To identify

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<sup>59</sup> National Archives and Records Administration, Transmittal No. 26, General Records Schedule 6.1: Email Management under a Capstone Approach, September 2016.

<https://www.archives.gov/files/records-mgmt/grs/grs06-1.pdf>

email of permanent value, the agency is investigating an approach similar to NARA's Capstone policy, with non-permanent email being retained for the duration of employment and possibly some years thereafter.

- At a local government agency, the interviewee's big bucket initiative focused on email because the agency's management believed that was the biggest retention problem. The interviewee initially did a user behavior survey to determine preferences for an acceptable number of buckets (folders) for an Outlook-based retention plan. 47 percent of the users said they would find a retention plan with 8 or more folders acceptable. 13 percent said they wanted no more than 7 folders. 22 percent had no preference. The users who participated in the survey were accustomed to saving email in folders; if they were not, their preferences might have been different.
- In another local government agency, the interviewee reported that the big bucket schedule does not provide a special retention category for email, which is to be handled like any other type of correspondence. District staff are instructed to save important email as .msg files in appropriate folders on a shared drive.
- An interviewee in a utility company reported that retention of email is linked to the company's records management application. Templates are set up to save email in the records management repository.
- The interviewee in a not-for-profit organization reported that email is removed from users' mailboxes after 2 years, transferred to an archiving system and replaced with a stub. Messages will be deleted from the email archiving system after 8 years. Email that requires longer retention must be transferred to a designated repository, such as SharePoint.
- An interviewee in a utility company reported that a big bucket schedule provided buckets for transitory records and backup copies, but it does not include a special bucket for email. Three levels of retention are applied to messages saved in the company's email system: 90 days is the default retention period; 2 years is the retention period for email that may be needed for reference; 5 years is the maximum retention period. Messages that need to be retained longer than 5 years must be saved in SharePoint or in the company's content management application.

## Issues and Concerns

For the most part, records managers interviewed for this study were satisfied with their big bucket initiatives, but some issues and concerns were noted:

- While their big bucket schedules technically cover all recorded information, most interviewees reported that they have not been applied to records maintained by database applications, which do not necessarily have the requisite retention functionality. Several interviewees reported, however, that their information technology units are receptive to incorporating retention functionality into existing database applications and are willing to consider retention requirements when future database applications are planned.
- Interviewees recognized the need to apply their big bucket schedule to inactive records in offsite storage. Where a database tracked records stored offsite, this involved changing the record codes and retention periods for individual boxes. Several interviewees reported that this time-consuming requirement was complicated by inadequate descriptions and incorrect categorization of older records stored offsite. In a financial services company, the interviewee reported that 7,000 to 8,000 boxes in offsite storage were never properly packed and indexed. Multiple record series and records from different years were commingled within boxes. Departments prepared their own indexes to boxes, but the indexes were not always available. Many boxes had to be examined and indexed before the big bucket schedule could be applied to them.
- Interviewees in federal government agencies, which have the longest experience with the big bucket approach, indicated that successful implementation depends on the conscientious efforts of documentation unit leaders in individual agencies. They emphasized that agency officials need to acknowledge that records management is important, that training is needed, and that knowledgeable people are needed to implement a big bucket schedule at the working level. Management must allocate sufficient support to the record retention program.
- In publications and listserv postings, critics of the big bucket approach have argued that consolidation obliterates the identity of record series when compared to traditional retention schedules that provide detailed lists of record series keyed to detailed file plans.

Addressing this point, several interviewees in organizations with well developed file plans noted that the criticism is not valid because retention schedules and file plans serve different purposes. Discussing a schedule developed for multiple federal agencies, one interviewee noted that the big bucket approach did not eliminate record series or invalidate file plans. A big bucket schedule merely specifies a uniform disposition for multiple record series. File plans remain useful for organization of agency records. Two interviewees reported that their big bucket initiatives led them to develop file plans to identify and organize records maintained by individual departments. One interviewee indicated that she would have liked to have had an up-to-date file inventory at the time the schedule was prepared, but she recognized that was impractical.

- Several interviewees reported that their big bucket schedules include some granular sections with detailed listings of record series that did not lend themselves to big bucket consolidation. These record series are separately listed and clearly identified in the retention schedule.
- An interviewee who developed a retention schedule for records maintained by state and local government agencies reported that user acceptance has been good, but some agencies are still looking for agency-specific record series.
- Like their granular counterparts, big bucket schedules require periodic review and updating, although big bucket schedules should be easier to update than their granular counterparts because they do not include a comprehensive enumeration of record series. A new record series can be added to an existing bucket by interpretation; it does not need to be specifically listed in the schedule. An interviewee in state government indicated that review meetings are being held monthly with the intention of issuing a new version of the big bucket schedule at the start of each year. An interviewee in an energy company reported that buckets are reviewed as necessary for new content types, but most new records can be accommodated within existing buckets.

Several issues raised in the literature were not reported by interviewees. In particular, no interviewees expressed concerns about the impact of big bucket retention on the legal hold and discovery process for litigation, government investigations, or other legal proceedings.

## Summary and Discussion

Most of the records managers interviewed for this study reported that their big bucket schedules satisfied their organizations' legal and operational requirements and were well received by users who found them to be easier to understand and apply than their granular predecessors:

- Interviewees' experience confirmed that the big bucket approach can significantly reduce the number of record series listed in a retention schedule. While some portion of the reduction may be attributable to removal of obsolete and duplicate record series, which could be accomplished by simply pruning a traditional retention schedule, big bucket consolidation is based on a thorough analysis and systematic grouping of record series related to specific business operations and activities. This consolidation is a defining characteristic of the big bucket approach and the principal reason for its effectiveness. A shorter retention schedule is presumably easier to use. With fewer choices, users are more likely to select the correct retention period for records in their custody or under their supervisory control.
- To further simplify retention rules, some interviewees tried to standardize retention periods and minimize event-based retention, but these measures are not core components of the big bucket approach. Arguing that complete elimination of event-based retention is neither possible nor desirable, some publications and listserv postings consider event-based retention incompatible with big bucket schedules. They contend that event-based retention requirements specified in laws and regulations are more effectively handled by a traditional granular approach, but it is not clear whether that is necessary in all situations. Project files, case records, and other records subject to event-based retention triggers can be consolidated in buckets with uniform retention periods based on regulatory requirements, contractual considerations, or other parameters. Depending on the circumstances, multiple buckets may be needed for different types of projects, cases, or other matters, but an increased number of buckets may blur the distinction between a big bucket schedule and a granular schedule. Alternatively, a single bucket could be assigned a very long retention period that satisfies the broadest range of legal and

operational retention requirements.<sup>60</sup>

- While retention rules may be simplified, the development and implementation of a big bucket schedule is a complicated, time-consuming undertaking. While they were not specifically asked to provide advice to would-be developers of big bucket schedules, all interviewees noted issues and concerns that must be addressed. Strong management support and stakeholder buy-in are essential. Users must be trained. A crosswalk mechanism must be developed to facilitate the transition from a predecessor schedule. The new retention rules must be applied to older records in offsite storage, some of which may not have been accurately identified when they were sent offsite.
- Over-retention, the most frequently criticized aspect of the big bucket approach in publications and listserv postings, was not an impediment for interviewees in organizations covered by this study. No interviewees reported resistance to the possibility that some records may be retained longer than necessary. Rather than being troubled by over-retention, some interviewees noted that stakeholders viewed long retention favorably.
- All interviewees described their big bucket schedules as media-neutral, but most

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<sup>60</sup> As an example drawn from the author's experience, a social services agency wanted a uniform retention period for case files related to substantiated child abuse investigations, preventive services, and foster care. A given child may be the subject of case records in all three categories, and case files in each category need to be consulted to accurately assess the child's welfare. In the agency's granular retention schedule, investigative, preventive, and foster care case files are covered by separate record series with event-based triggers determined by regulatory requirements. As specified in state law, case records for substantiated child abuse investigations must be retained until the youngest child in the family attains age 28. Case records for preventive services must be retained until the youngest child in the family attains age 24. For both types of cases, the retention trigger is a problematic moving target because a family may have additional children. Case file for foster children must be retained for 30 years after a child leaves foster care. A child may enter foster care at age 1 and remain in care until age 21. To satisfy all of these regulatory requirements without event-based retention triggers, case files must be kept for at least 50 years from the date a file was opened.

organizations have not fully implemented retention guidance for electronic records. A big bucket schedule is more likely to be applied to email or to digital documents saved on network drives than to databases, which may require modification to incorporate the requisite retention functionality.

- While the advantages of the big bucket approach for automated retention of electronic records have been widely discussed in publications, listserv postings and other sources, less than a quarter of the interviewees reported using a records management application or other software to manage retention of electronic records.

This study was limited to experienced records managers who adopted big bucket retention concepts, invested considerable time and effort in schedule development, and were generally satisfied with the outcome. None of the interviewees expressed regret about the decision to use the big bucket approach. While several interviewees indicated that their big bucket schedules included some granular sections, there was no discussion of reverting to a traditional retention schedule. As previously noted, the interviewees were self-selected based on the author's description of the study, which may have attracted respondents with favorable experiences in successful big bucket initiatives. It would have been interesting to hear from records managers who had attempted to develop a big bucket schedule but could not do so, for whatever reason, or who had implemented a big bucket schedule but subsequently reverted to a traditional approach, either by abandoning the big bucket schedule outright or by incorporating granular modifications that changed the character of the schedule. Records management publications and listserv postings contain no reports of such developments.



## **About the Author**

William Saffady is a RIM consultant and researcher based in New York City. He is the author of over three-dozen books and many articles on records management, record retention, document storage and retrieval technologies, data protection, and other information management topics. His latest book, *U.S. Record Retention Requirements: A Guide to 100 Commonly-Encountered Record Series*, was published in 2018 by ARMA International. He is currently working on a global survey of retention requirements for accounting records.



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