The City of Milwaukee's ability to manage all public records and information effectively has not kept up with developments in the use and proliferation of electronic records. The absence of Citywide controls on the creation, organization, storage, and disposal or archiving of information creates a multitude of potential administrative and legal problems across City government:

- **Improper destruction of data/records.** Employees may accidentally destroy records needed to conduct city business or fulfill the documentation requirements of an audit or litigation. Improper destruction could also lead to the city being unable to otherwise defend against otherwise defensible litigation. This may result in legal action and/or financial loss.
- **Incorrect or inefficient file organization.** If data is misfiled, the best case scenario is increased time to produce records, hurting efficiency and transparency. In the worst case, misfiled documents may become lost altogether, or sensitive data may be inappropriately released. Either case may increase administrative and financial burden on the City.
- **Incorrect labeling/classification of data.** Data that should otherwise be labeled as sensitive or confidential may be missed through reliance on manual classification, resulting in inappropriate exposure of PII, PHI, and financial information to unauthorized persons. A data breach could result in substantial financial losses and damage the City's reputation.
- **Insufficient control of asset security.** Computers, networks, physical storage, and other information systems may provide unauthorized or outdated access to information assets, greatly increasing the risk of data breach and subsequent legal and financial repercussions.
- **Data Theft and Leakage.** Without uniformly applied data classification rules, data may become accessible to unauthorized users even in systems with robust security models.
- **Insufficient awareness of policy/procedure.** City compliance departments maintain data governance and records policies, but lack the resources to widely disseminate or enforce them.

Information Governance, which provides strategy and framework for managing the risks and value of information across an organization, offers solutions to these problems by reclaiming control of the City's records and data. The City Information Management Committee proposes an information governance framework comprised of both personnel and technology components:

- Creation of authority for a **Data Governance Analyst** position, who would work with City Records, Information Security, and all City departments to identify threats and opportunities for building up City government's information maturity. This position would work with departments to identify sensitive data, define and update data sensitivity classifications, and make recommendations for security and retention controls within all city systems. The Data Governance Analyst would monitor data flow and sharing to ensure compliance with established policies, and provide training and support for proper data handling.

- Procurement of an **Electronic Records Management System/Content Services Platform**, which would provide systemic controls for classification, retention, and disposition of born-digital city records. The system would provide robust monitoring and audit capabilities to allow the Data Governance Analyst to review data usage and identify potential unauthorized access and data loss incidents before they become problems. Such a system should at minimum manage unstructured data (desktop files) and include a business intelligence component to allow governance at scale.

Data governance failures have struck numerous municipalities in the last five years alone, causing millions of dollars in damage from ransomware costs, adverse inference, and data breach response. The City of Milwaukee must take action to control its records and information now, before it joins Atlanta (2018), Baltimore (2019), D.C (2021) and Dallas (2021) on the list of data casualties.