# RECORDS MANAGEMENT HANDBOOK







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STATE OF CALIFORNIA

Records Management Handbook

RECORDS RETENTION

The records management program section (Chapter 1600) of the State Administrative

Manual (SAM) defines the responsibility of each agency to implement a records

management program and prescribes the procedure for scheduling and disposing of

records. This Records Management Handbook supplements the information in SAM

and the practical guidelines posted on the California Records and Information

Program's (CalRIM) website.

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# **CHAPTER 1**

### Introduction

Our ability to manage records has not kept pace with our ability to create them. We have computers full of files and folders and images; inboxes brimming with emails; high-speed copiers grinding out reams of paper; cloud servers storing terabytes of data; filing cabinets and store rooms and binders and desk drawers stuffed with documents.



While paper records are still the backbone of many offices' workflow, electronic records are emerging as the future of records management. In today's highly technical environment, the majority of our records are created and maintained electronically. We will analyze this further and delve into the maintenance of electronic records in this handbook.

# How Does Your Records Management Program Look?

- Do you know what records you have and where they are located?
- Who uses those records and how often?
- How much does it cost to store your records?
- Who oversees your records management program?
- Does your agency have Retention Schedules for all its records?
- Can you rely on your Schedule when you receive a Public Record Act (PRA) request?

### What is Records Management?

Records Management is the system an office uses to create, maintain, and preserve or destroy its records. When a State entity creates a record, a plan must exist for where the record will be kept, how long it should be kept, will it need to be preserved for historical reasons, or will it eventually be destroyed?

### Note:

There are many different types of entities in California that create State records—Agencies, Boards, Bureaus, Departments, etc. For simplification, this Handbook will use the phrase "State entity" to encompass all these groups.

The Secretary of State has assigned the development and implementation of the state's records management program to the California Records and Information Management (CalRIM) program and the State Records Appraisal Program (SRAP) within the State Archives Division.<sup>1</sup> The programs were established to "administer a records management program [for the State] which will apply efficient and

economical management methods to the creation, utilization, maintenance, retention, preservation and disposal of state records".<sup>2</sup>

State entities are required to comply with the rules, regulations, standards, and procedures related to records management issued by the Secretary of State through the CalRIM and SRAP programs.<sup>3</sup>

CalRIM operates based on several Government Codes which outline how government records should be dealt with:

# **Statutory Authorities:**

- Public Records Protection and Recovery (Government Code §§6204-6204.4)
- State Archives (Government Code §§12220-12237)
- State Records Management Act (Government Code §§12270-12279)
- State Records Storage Act (<u>Government Code §14740-14746</u>)

<sup>&</sup>lt;sup>1</sup> State Administrative Manual Section 1602

<sup>&</sup>lt;sup>2</sup> Government Code §12272(a)

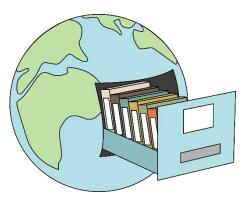
<sup>&</sup>lt;sup>3</sup> Government Code §12274(d)

### What is a Record?

California Government Code defines records as "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics."<sup>4</sup>



A record is any document received, created, or used by a State entity during the course of business. A record could be official correspondence, litigation files, video recordings, meeting minutes, social media, databases, maps, photographs, invoices, employee personnel files, and much more.



Certain records like correspondence, meeting minutes, and employee personnel files are universally used by almost all State entities. Each State entity may also have more specialized records depending on its duties and mission. For example, the Department of Finance will likely have more fiscal-related records than other State entities; the Department of Human Resources will likely have more

personnel-related records, etc.

It is the responsibility of each State entity to develop a records management program tailored to the work the State entity performs and which suits the entity's needs. CalRIM will assist by providing training, holding informational meetings, and by reviewing and approving Records Retention Schedules.

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<sup>&</sup>lt;sup>4</sup> California Government Code Section 6252(e)

### What is Not a Record?

While there are many different types of records, there are also many documents created by State entities which may not be considered records. Copies, duplicates, or publications that are kept for purposes of personal reference or convenience may not be considered records.

# **Examples of Possible Non-Records:**

- Personal papers or papers of a nonofficial nature that pertain to an individual's private affairs.
- Informal notes, worksheets, and rough drafts that do not represent the basic steps taken to prepare the document.
- · Library and reference material.
- Material used to facilitate operations but not to support, enable, or document administrative action.

### Record vs. Record Series

While a record is any document created by a State entity during the course of business, a record series is a group of related records arranged under a single major category. These records are created and maintained as a unit because of their relationship and the purpose they serve.

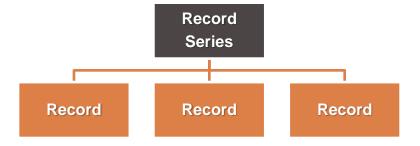


Figure 1. Individual Records Comprising a Record Series

The records may deal with a particular subject, may result from the same activity, or may have a distinctive form—such as maps, blueprints, and purchase requests, etc. A record series may exist in any format or possibly exist in multiple formats—electronic, magnetic, microfilm, paper.

Record series become very important when taking an inventory of records. During the inventory, a list will be created of records kept in the office—in drawers, filing cabinets, on computers or cloud storage, etc. All the records kept in the office will then be combined into records series and added to the Records Retention Schedule.

Each record series must have a title. The title should be concise and descriptive of the types of records contained in that series. For example, the title "Project X Files" refers to records that pertain to a particular project being completed by the office.



Figure 2. Example of Records Within a Record Series

This is just one possible example of how to organize a record series. Depending on the needs of the State entity, records series may be organized in many different ways. For example, the Project X Budget Reports may be listed under the Fiscal Records series and the Project X Media Activity may be listed under the Media Records series.

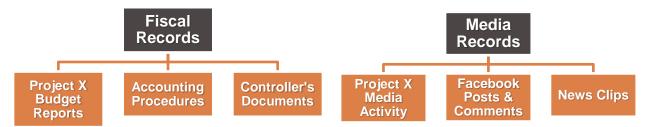


Figure 3. Fiscal Record Series Example Structure

Figure 4. Media Record Series Example Structure

The structure of records series should reflect current business practices. Records should be organized into series based upon how they are used during daily business and how they are organized within the office. How to enter these records and records series in the inventory and in the Records Retention Schedule will be covered later in this Handbook.

### The Life of a Record

Records are dynamic, not static. Very few records are important enough to be kept forever. The original California Constitution is preserved in the State Archives for posterity. Regular office files may only need to be retained for a certain period of years, then destroyed.

# Storage vs. Archival

Storage may refer to records being retained somewhere other than the office where they are created, used, or received. This may include a storage facility within the building, the State Records Center (SRC) or some other storage facility, or cloud storage. When a record is "archived" it is sent to the State Archives to be accessioned, evaluated, preserved, and referenced.

Even long-lived records have a creation date, a period of usefulness, and a disposition. A record's creation and its disposition (destruction or transferal to the State Archives) are the beginning and ending of its life.

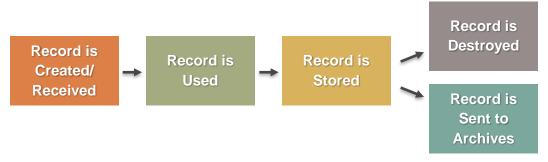


Figure 5. Life of a Record

Five general steps most records go through during their life:

- 1) Creation: When information and records are created or received.
- 2) **Use:** When information and records are transmitted to those who need them and, upon receipt, are used in the conduct of business.
- 3) Storage: When information and records are filed or stored to permit subsequent retrieval and are protected so as to safeguard the integrity of the information. Stored records should be regularly appraised to determine their reference status and value. If the record is not frequently referred to, it may be stored in another location away from the office.
- 4) **Destruction:** When information and records reach the end of their retention and have no further legal, fiscal, or administrative value they are safely destroyed OR
- 5) **Archival:** When information and records are preserved in the State Archives for on-going historical reference or research purposes. A record's archival value is determined by the State Archives, not by State entities.<sup>5</sup> Once the record is transferred to the State Archives, it no longer belongs to the State entity.

In order to have a robust records management program, it is important to take a macroscopic view of the life of the records a State entity holds. By examining how records are created, who uses them, where they are stored, and how often they need to be referenced, State entities will be able to make informed decisions regarding the use, storage, and disposition of their records. There may be more efficient ways to store

<sup>&</sup>lt;sup>5</sup> Government Code §12224

records. Some of the records may not be referenced very often and may be stored offsite in a less expensive facility. State entities may be able to dispose of records that are no longer useful to business operations. Space, time, and money may be saved by looking at the life of records and building a records management program according to that life process.

### The Purpose of a Records Management Program

Properly managed, records protect personal and organizational rights, as well as supporting, defending, and accounting for the State's business activities. A records management program ensures that information contained in the State's records is available to the public when and where it is needed at the least possible cost. State entities are mandated by the State Records Management Act<sup>6</sup> to establish "and maintain an active, continuing program for the economical and efficient management of the records and information collection practices of the agency."

<sup>&</sup>lt;sup>6</sup> Government Code §12270-12279

# CHAPTER 2

### **Establishing the Program**

For a records management program to be successful, support must come from the top down. Top level management must be aware of the program's goals and the importance of achieving those goals. Records management policies cannot be enforced agency-wide without executive support. Middle level management must also be



Figure 1. Management Participation in a Records Management Program

onboard. Their staff will be on the records management team working with the records on a daily basis. One way to keep top and middle level management engaged is to invite them to attend California Records and Information (CalRIM) training classes and events.

Once management support for the program has been obtained, a highly motivated and knowledgeable facilitator must be assigned the role of Records Management Coordinator (RMC) for the agency.<sup>1</sup> Responsibility for this function must be assigned at a level within the organization that has access to program managers and senior management officials.

# **SAM Recommendation:**

The State Administrative Manual (SAM) recommends that, "the Records Management Coordinator be assigned to staff at an SSA level or above." This is because "a coordinator at the SSA level or above will have broader knowledge of the overall agency organization and function and be able to make management-driven records management decisions."<sup>2</sup>

<sup>&</sup>lt;sup>1</sup> State Administrative Manual Section 1604

<sup>&</sup>lt;sup>2</sup> State Administrative Manual Section 1604

### **Role of the Records Management Coordinator (RMC)**

The RMC is in charge of the entire records management program for their State entity. They serve as the contact person for all records management-related issues both within and outside the State entity. The RMC serves as the liaison between their State entity and the Secretary of State's (SOS) CalRIM program and State Records Appraisal Program (SRAP). The RMC also serves as the liaison between their State entity and the Department of General Services (DGS) and State Records Center (SRC).

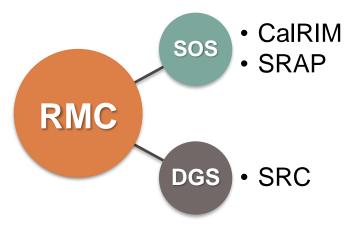


Figure 2. Records Management Coordinator liaison role

The RMC shall be appointed in writing by the Chief Administrative Officer of the State entity using the Records Management Team Designation Form. Once the RMC is appointed, the designation form must be filled out electronically and emailed to CalRIM@sos.ca.gov. The RMC will then be designated to contact CalRIM with questions regarding Records Retention Schedules, transferring records to the SRC, confidential destruction of records, and any other records management-related questions.

The new RMC must also contact the SRC at (916) 375-6760 to let DGS know they are the RMC for their State entity. The SRC may need to contact the RMC regarding the transfer of records, the retrieval of records, record destruction, and more.

# Don't Forget!

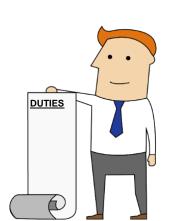
Once an RMC is appointed, they must contact CalRIM at <a href="CalRIM@sos.ca.gov">CalRIM@sos.ca.gov</a> to let the Records Management Analysts know they have been added to their State entity's records management team. RMCs must also contact the SRC at (916) 375-6760 and let DGS know they have been appointed.

### Possible duties of the RMC may include:

- Coordinating the State entity's records management program.
- Conducting research into records retention requirements.
- Reviewing and signing Records Retention Schedules prior to submission to CalRIM.
- Tracking and maintaining Records Retention Schedules to ensure current approval status.
- Reviewing and approving purchase or rental of filing equipment and shredders to prevent unauthorized destruction of records.
- Responsibility for reports, written justifications, requests for offsite storage approval, or any other Retention Schedule documentation requested by CalRIM and/or SRAP.



- Regular disposition of records not stored at the SRC. This includes transfer of records to the State Archives or the SRC, as well as destruction of records at the Document Destruction Center (DDC).
  - Ensuring records are retained and
- disposed of according to the Records Retention Schedule.
- Disseminating announcements of records management activities, policies, and procedures.
- Scheduling appropriate training of records management personnel.



- Attending CalRIM Records Management Coordinators Semi-Annual meetings and sponsored technology forums.
- Periodically reviewing policies and procedures to ensure that the program is properly applied.



Being a Records Management Coordinator (RMC) is an important role. The RMC must ensure their State entity is abiding by records management rules and laws in order to protect the State entity's information assets, historical records, and to guard against possible litigation and audits. The role of RMC entails a great deal of power and responsibility. The staff of CalRIM, SRAP, and the SRC are here to help with these responsibilities and to help RMCs create a well-run records management program.

### **Role of the Records Management Assistant Coordinator (RMAC)**

The ongoing maintenance of a records management program may warrant the need for additional assistance. If necessary, the RMC may need to assign the role of Records Management Assistant Coordinator (RMAC) to one or several employees to assist them with running the records management program. The RMACs will usually be staff who work closely with the units receiving or generating the records. If a State entity is large, the RMC may appoint multiple RMACs for each division, section, unit, etc.

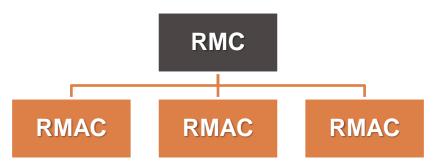


Figure 3. Hierarchy of Records Management Program Team

By designating additional staff members as RMACs, the agency RMC can create a network of individuals who share the responsibility for oversight of the records management program.

The role of the RMAC is to act as a liaison between the RMC and the staff of a particular program area within a State entity. The RMAC should be a staff member who works closely with program staff creating and working with records. While the RMC is responsible for the records of the entire State entity, the RMAC is more specialized and knows fewer records, but in greater detail. This proximity allows the RMAC to help program staff make appropriate decisions regarding the management of their records.

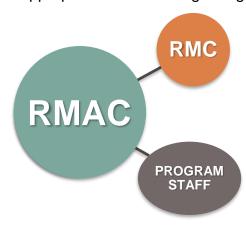


Figure 4. Records Management Assistant Coordinator liaison role

One of the suggested responsibilities of the RMAC is to conduct regular inventories of the records in their program area. By conducting regular inventories every few years, the RMAC ensures that the records and volumes listed on their Records Retention Schedules are correct.

To conduct the inventory, the RMAC will work with program staff to identify both physical and electronic records held by the unit. With the help of program staff and the RMC, the RMAC will then compile these records into record series which will be entered in the Records Retention



Schedule. It is then the responsibility of the RMC to review the Retention Schedule before sending it to CalRIM for approval. The inventory and Retention Schedule processes will be covered later in this Handbook.

### Possible duties of the RMAC may include:

- Determining if records series are being created, updated, or discontinued.
- Conducting inventories to update the records and volume of records on the Records Retention Schedule.
- Working with program staff to accurately describe records series and identify the records contained within those series.
- Ensuring that internal office procedures have been established that will allow all authorized users to have access to office records.
- Assisting the RMC with the correct disposition of records according to retention periods listed on the Records Retention Schedule.

NOTE: If the State entity only has an RMC and no RMACs, the RMAC duties must also be performed by the RMC.

The RMAC is an essential part of the records management program. The RMAC works directly with program staff and has a much closer relationship with the records being generated by the State entity. It is essential that this direct knowledge of the records be translated up to the RMC and to middle and top level management.

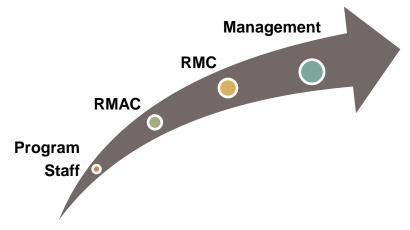


Figure 5. Records Management Knowledge Transfer from Program Staff to Management

# CHAPTER 3

# **Records Inventory**

### The Records Inventory

To have an efficient records management program, it is essential to conduct regular inventories of an agency's record holdings. Regular inventories provide a complete understanding of what records are generated and utilized within each work space. The inventory process applies to both physical records—papers, maps, photographs, blueprints, publications, etc.—and electronic records—computer files,



databases, emails, servers, etc. The State Administrative Manual (SAM) <u>Section 1612</u> requires State entities to inventory their records once every five years.

The following examples are merely suggestions of how a State entity may conduct an inventory. State entities may use the Records Inventory Worksheet (STD. 70) as a template or adapt it to suit their needs. The inventory process may need to be adjusted depending on staffing, structure, and the State entity's needs. In this chapter, the Records Management Assistant Coordinator (RMAC) is identified as the person responsible for conducting the inventory. This may vary depending on the needs of each State entity. The person responsible for conducting the inventory may be the Records Management Coordinator (RMC), program staff, management staff, or other.



To establish a records management program, it is necessary to find out what records exist; where the records are stored; the quantities of those records; and how the records are used. Program staff often know best what records they create, maintain, and store. Program staff should be able

to accurately describe what these records are and what they're used for. For this reason, it's important that records management staff work with program staff to collect

the most accurate information regarding their records and to enter that information correctly into the records management forms.

State entities who have never participated in the Records Management Program before should conduct inventories of their records before creating a Record Retention Schedule (STD. 73). An inventory will document exactly what records a State entity receives, generates, and uses. The inventory gives program staff a chance to describe the purpose and use of their records; this information may be useful in the future when trying to determine the history of a State entity's operations. An inventory should also be conducted for any new units or program areas that have been created within a State entity.



Figure 1. Program Staff & Records Management Staff Roles

After the initial inventory, a State entity should conduct periodic inventories to determine if anything has changed. How often a State entity conducts an inventory should be determined by the RMC according to the needs of the agency. Per SAM Section 1612, State entities should conduct inventories every five years when their Records Retention Schedules expire.

### **Preparing for the Inventory**

The first step of an inventory is to identify which areas within the State entity need to be inventoried. Using Figure 2 as an example, the Fiscal Division of a State entity may have a Retention Schedule about to expire. The Fiscal Division includes two units:

Budgets and Accounting. If the Budgets and Accounting units have not conducted

inventories recently, they may want to verify that the records series on the Fiscal Division Retention Schedule are still relevant and that the volume of those records is still accurate.

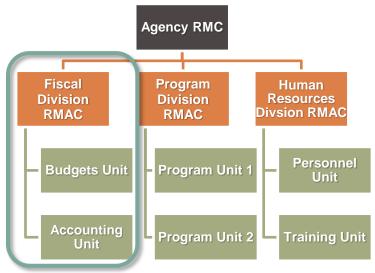


Figure 2. Organizational Chart Identifying Unit Being Inventoried

The Fiscal Division RMAC should be familiar with the operations of the Budgets and Accounting units. During the inventory, the RMAC would be the contact person between the unit program staff and the RMC of the whole State entity.

The program staff should know where records are stored within these units—shelving units, closets, safes, cabinets, storerooms, basements, offsite storage facilities, and the SRC. This includes the storage locations of electronic records—computers, databases, share drives, and external storage.

Before beginning the inventory, the Fiscal Division RMAC, the RMC, and the Fiscal Division managers and supervisors should meet to discuss the needs and goals of the inventory. It is important to involve the managers and supervisors in this process because it is their staff who will be responsible for conducting the inventory. The records management staff and the management staff should create a plan to ensure the regular workload of these units continues, while making time for conducting the inventory.

# Records Inventory Roles and Responsibilities

The Fiscal Division managers and supervisors and the Records Management Team should develop a plan that clearly lays out the roles and responsibilities of the inventory process. The plan should include a timeline for the inventory, with clear deadlines, though this timeline may need to be adjusted as work progresses. The plan should lay out the schedule of the inventory, with estimates of staff hours necessary to complete each task.

### **Agency RMC**

Oversees records management activities.

### Unit RMAC

- Familiar with the operations of the unit(s) being inventoried.
- •Liaison between program staff and RMC/management.

### **Managers & Supervisors**

- Know the operations of the unit(s) being inventoried.
- Manage program staff workload.

### **Program Staff**

- •Knows where records are stored.
- Knows purpose and use of records.

Figure 3. Roles & Responsibilities in a Records Inventory



Once the Fiscal Division managers and supervisors and the RMC and RMAC have reached a consensus, the managers and supervisors will inform the program staff that an inventory of their records needs to

be conducted. Program staff must be made aware of how important this inventory is to the records management program and to the agency as a whole.

### **Creating a Map**

To make it easier for program staff to inventory their records, the RMAC should create maps of the areas being inventoried. These maps should be simple floor plans of the areas where program staff work and the areas where records are stored. The maps can be as simple as a hand drawing on graph paper or as complex as a computer rendering of the program area.

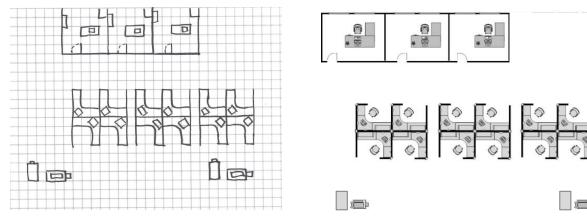


Figure 4. Hand-Drawn Floor Plan

Figure 5. Computer-Generated Floor Plan

A consistent system should be used to label each workspace and storage area where records are kept. A key should be developed to explain what these labels mean. State entities may develop their own labels for the key, according to their needs. These labels should be used consistently throughout the inventory to prevent confusion. Using the example key in Figure 6, the maps may be

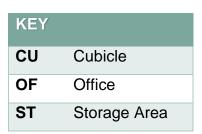


Figure 6. Example Key of Storage Location Labels

OF3 OF2 OF1

CUID CUI CUI CUI CUI CUI

CUI2 CUI1 CUI CUI CUI

ST2

ST2

Figure 7. Hand-Drawn Floor Plan with Labels

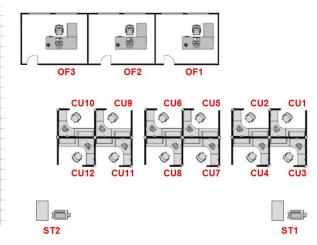


Figure 8. Computer-Generated Floor Plan with Labels

labeled like this:

### **Desk by Desk**

After creating a map of the overall office area in the unit, the RMAC (or whomever is responsible for the inventory) should also create maps of each individual cubicle and storage space. Program staff may not be aware that some of the documents they work with are records. The RMAC should discuss with program staff what documents they work with, where the documents are located, whether or not the documents meet the definition

KEY	
COM	Computer
FC	Filing Cabinet
FS	File Shelf
OHS	Overhead Shelf
PC	Pedestal Cabinet

Figure 9. Expanded Example Key of Storage Location Labels

of a record (see the "What is a Record?" section of this Manual), information security requirements, and any access restrictions.

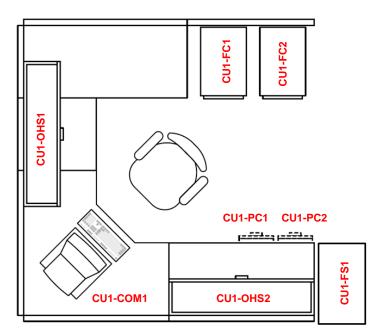


Figure 10. Cubicle Storage Location Map

Storage locations in each cubicle and office and storage space should be labelled. Each area should also be assigned a unique number or title to keep track of which records are located in which area. The key should be expanded to include these new categories. State entities should develop the key to reflect the storage spaces in their work areas. Using the example key in Figure 10, an individual cubicle map may be labeled like this:

### **Records Inventory Worksheet (STD. 70)**

The RMAC may give the maps of the general areas to the unit supervisor (or whomever has been delegated the task of inventorying general storage areas). The RMAC should give each of the program staff a map of their cubicle. The unit supervisor may fill in the Records Inventory Worksheet (STD. 70) for the common storage areas with the help of program staff.

After inventorying their cubicle, each individual program staff will fill out the Inventory Worksheet with the record series found in each labeled storage area. The inventory should be conducted by file location to avoid missing any documents.

The STD. 70 is a sample guide of how a State entity may document an inventory. State entities may develop their own inventory worksheets to suit their business processes. The inventory worksheet is an internal document and will not be used outside the State entity. CalRIM does not review or approve inventory worksheets, so State entities may alter the STD. 70 or create their own templates.

### **Record Series Title**

As stated in the Introduction, a record series is a group of related records arranged under a single major category. These records are created and maintained as a unit because of their relationship and the purpose they serve. The records may deal with a particular subject, may result from the same activity, or may have a distinctive form—maps, blueprints, and purchase requests are good examples. A record series may exist in any format and may possibly exist in multiple formats—electronic, magnetic, microfilm, or paper.

When conducting an inventory, it is important that the title of each record series be as accurate as possible because all future references to the records will use the assigned title from the Inventory. Vague titles, such as "Corporate Papers," "Miscellaneous Files," "Official Documents" or "Vital Correspondence" should not be used.

### **Record Series Description**

The description of a record series should outline the contents, function, and purpose of the records in that series. This section should contain information on how the records are used, what function the records serve in the unit, and what business processes the records support or document. The description should be written as if explaining the record series to a person who is completely unfamiliar with the processes and purpose of the unit and the State entity. Any acronyms should be spelled out or defined in a separate key.

It is especially important to note in the description if the records pertain to higher levels of management within the State entity. This information is essential to State Archivists who will review the Records Retention Schedule, looking for records of historical interest. For example, if a record series includes decision-making correspondence by a Division Chief, or maps of historical buildings and locations, or Committee or Board meeting minutes, etc.

#### File Location

The file location of a record series will refer to the map created by the RMAC. The file location should include the room or cubicle number and the numbered location within that room or cubicle.

### **Media Type**

Records exist in many different media formats. The four main media categories are electronic, film, magnetic, and paper. Within each of these four categories, there are multiple types of "carrier" where records may be stored.

Code	Media Type	Examples
E	Electronic	CD, Database, DVD, Email, Removable
		Media, Server, Social Media, etc.
F	Film	Film Stock, Microfiche, Microfilm, Silver
		Halide, etc.
M	Magnetic Media	Audio Cassette, VHS, etc.
Р	Paper	Architectural Drawing, Blueprint,
		Graphic Print, Map, Photograph, etc.

Figure 11. Media Type Chart

More specific information on the media carrier type should be included in the Remarks section of the Inventory Worksheet. For example, if a record series is labeled with media type "E" for electronic, the Remarks should say whether the records are stored on CDs, removable media (like a thumb drive), on a database, etc. It is important to know what carrier type records are stored on, especially if the records are identified as having potential historical importance and may go to the State Archives at the end of their retention period. The Archivists at the California State Archives will need to know if the State entity is going to send 100 cubic feet of boxes or 100 terabytes of data on 10 hard-drives.

If a record series exists in multiple media formats, each media should be listed as a separate line item.

### **Years Covered**

Years covered refers to the specific period of years covered by the record series. Years should be written from the earliest to the latest period. For example, a record series may include documents created during the years of 2000 to 2018 and would be written, "2000-2018".

### **Reference Status**

How frequently a record series is accessed may determine where it should be stored. Records that are accessed daily by staff have a higher reference status and will need to remain in the office longer than records that are only accessed by staff a few times a year. Records with a very low reference status usually do not need to be retained in the office and may be moved to a low-cost storage area like the State Records Center.

Reference Status	Frequency of Use
High	Referenced on a daily basis. Records need to be readily available to staff.
Medium	Referenced on a weekly to monthly basis. Records may be moved to a storage area within the building or to an offsite storage center.
Low	Referenced a few times per year or every few years. Records are no longer required to conduct daily business activity. May be stored offsite until retention period has ended and records may be destroyed or sent to the State Archive.

Figure 12. Reference Status Chart

### **Document**

This section refers to whether the record series contains record copies or access (also known as convenience) copies of records. A record copy is the version designated by a State entity as the official record. Access copies are for personal reference and may not need to be retained. Determining whether a record is a record copy or an access copy gets complicated when some records series contain both record copies and access copies. In order to determine if a record series contains record or access copies, the person filling out the Records Inventory Worksheet (STD. 70) and the Records Retention Schedule (STD. 73) may need to consult with other divisions in the State entity as well as with control agencies responsible for those types of records.

#### Volume

The volume of a record series is the amount of space those records occupy. Volume may be comprised of physical space—such as the number of boxes needed to contain the records—or volume may be comprised of digital "space"—such as the number of bytes a record may take up on a computer. When calculating the volume of records series for the inventory, the totals should represent the records on hand at the time of the inventory.

The basic measurement for paper, film, or magnetic records is the 15" (long) x 12" (wide) x 10" (deep) Records Storage Box used to send records to the State Records Center (SRC). One full Records Storage Box equals one (1) cubic foot (C.U.).



Figure 13. Record Storage Box 1 C.U. Volume

Electronic record volumes shall be reported in bytes—megabytes, gigabytes, terabytes, etc. In the Remarks column, more specific information on the media carrier type should be included, such as whether the records are stored on CDs, removable media (like a

thumb drive), or on a database, etc. For more details, refer to the <u>Guide for</u> Computation of Record Volume.

### Remarks

The remarks section is important for creating the Records Retention Schedule after the inventory is complete. Remarks specify the end of the active period, cite code sections relevant to the records, outline the disposition of the series, the vital or confidential status of the series, and more. In the case of electronic records, the remarks section will include the storage method used for the record series, the retention period, the back-up process, and the disposition of the electronic records.

As staff complete the Inventory Worksheet (STD. 70), they should note in the remarks section any records series already possessing established retention periods, as well as any comments pertaining to the filing activity or the frequency of reference for the records.

# Potential Remarks Section Components:

- End of Active Retention Period
- Retention Period Justification
- Vital Storage Method
- Confidential Status
- Disposition
- Electronic Records Storage
   Method

- Electronic Records Back-Up Process
- Code Citations
- Legal Requirements
- Policy/Procedure Citations
- Information Security
   Classification and Categorization

### **Completing the Inventory**

After program staff have completed the Inventory Worksheets, they will give the Worksheets to the Records Management Assistant Coordinator (RMAC). With the help

of the Records Management Coordinator (RMC), the RMAC will combine the records series on each Worksheet into one final Inventory Worksheet. This will provide an opportunity to see where any duplication may exist. Once the final Inventory Worksheet is complete, the RMAC and/or RMC will use it to appraise the records series, set retention periods, and create a Records Retention Schedule.

The RMAC should retain the final Records Inventory Worksheet and the maps in their records management files. It is a best practice to maintain digital copies of these files so they may be easily updated during future inventories.

### **Why Conduct Regular Inventories?**

Regular inventories are an essential part of a strong Records Management Program. It is recommended that a new inventory be conducted every five years when the Records Retention Schedule (STD. 73) expires.



Conducting inventories on a regular basis prevents records from accumulating in the office. If the Retention Schedule is filled out and approved but records are not disposed of according to their retention periods, space can quickly be consumed by records that do not need to remain in the office.

An inventory helps ensure the records on the Retention Schedule are still being used by the office and allows the record volume to be updated if necessary. Records series may have been added, altered, or deleted since the previous inventory. The layout of the office may have changed since the last inventory, or staff may have been moved or changed.

By conducting regular Records Inventories, State entities may be confident in knowing what records they hold, where those records are located, and the volume of those records.

# **CHAPTER 4**

# **Records Appraisal**

After the inventory is completed, the next step for the Records Management Program is to decide how long each record series should be retained in the office and/or in storage before it becomes eligible to be destroyed or transferred to the State Archives. To make this determination, the State entity must appraise the records' immediate and future usefulness to the State entity, as well as to the entire State Government.

### What is Records Appraisal?

Appraisal is the process of determining the value and the disposition of records based on their current administrative, legal, and fiscal use; their evidential and informational, or research value; their arrangement; and their relationship to other records.

### Why Appraise Records?

Records are appraised to determine their period of usefulness and value to the State entity that created and/or used them. This applies to records of all formats and media types.

A thorough appraisal of records will foster efficient and effective administration, enable decision-making and policy development based on current information, will allow State entities to be accountable for the management of their resources, and to be prepared for legal and financial scrutiny.

Fiscal Historical

# **Appraising Records Allows For:**

- Establishing reasonable retention periods.
- Identifying records that may be destroyed immediately.
- Identifying records that may be transferred to offsite storage.
- Establishing which records are considered the "copy of record".
- Identifying vital records.
- Identifying records that are exempt from public disclosure.
- Identifying records with specific security or access restrictions.

### **Appraisal Categories**

When appraising records, State entities will determine the records' administrative, legal, fiscal, and historical value. These values are based on an analysis of work processes, legal requirements, research needs, as well as other factors. Records may have more than one value.

Some examples of records with these values may include:

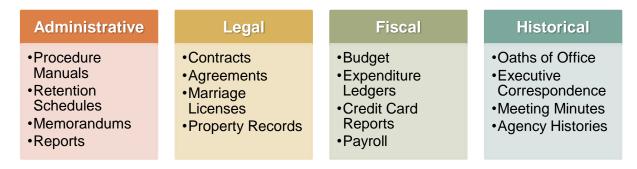


Figure 1. Record Values Examples

The ultimate purpose of an appraisal is to determine the retention period and disposition of records.

#### **Administrative Value of Records**

Records are created to document the functions a State entity performs. Records have administrative value so long as they assist the State entity in conducting either current or future work. The primary administrative use for most records is exhausted when the transactions to which they relate have been completed. From that point on, the records begin to lose their administrative value.

Some administrative records contain basic facts concerning a State entity's origin, policies, functions, organization, and significant administrative decisions. These records should be preserved to provide documentation of a State entity's operations in the past, present, and future.

#### ADMINISTRATIVE VALUE

Identifies the usefulness of the records series to the originating State entity in carrying out day-to-day activities.

Figure 2. Administrative Value

#### **Legal Value of Records**

#### **LEGAL VALUE**

Record series with legallymandated retention periods, or records which document legallyenforceable rights or obligations, both those of the government and those of persons directly affected by an agency's activities.

Figure 3. Legal Value retention period.

Records have legal value if they contain evidence of legally-enforceable rights or obligations to the State. These records must be made available if they are requested for litigation or legal hold, and may not be destroyed once requested, even if the records have come to the end of their scheduled

Some examples of records that may provide the basis for actions are: legal decisions and opinions; fiscal documents representing agreements, including leases, titles, and contracts; records of action in particular cases, such as claim papers and legal dockets, etc.

#### **Fiscal Value of Records**

Records of fiscal value are those which pertain to the financial transactions of a State entity such as budgets, ledgers, allotments, payrolls, and vouchers. After records have served their basic

#### FISCAL VALUE

Record series which document financial authorizations, obligations, and transactions, and provide an audit trail.

Figure 4. Fiscal Value

administrative functions, they may still have sufficient fiscal value to justify their retention in storage to protect the State entity from litigation, or to account for the expenditure of funds.

Records with fiscal value may be subject to audit and may need to be retained for a period of time allowing for an audit to be initiated. Once audits have been resolved, fiscal records often lose their value.

#### Research & Historical Value of Records

#### HISTORICAL VALUE

Record series which provides valuable information relating to persons, things, places, and events which may be valuable for historical or scientific research.

Figure 5. Historical Value

Some records have enduring historical value because they reflect significant historical events or document the history and development of a State entity. Records which capture significant actions of government, such as key correspondence or policy directives from a State entity's administration, may be important for future research.

When determining the historical value of a record, it is necessary to consider the types and extent of research currently being done and to try to anticipate what records may be needed in the future. Records selected for research purposes should be critically examined and periodically re-evaluated to ensure the accumulating material is filling a valid research need.

#### **Vital Records**



Figure 6. Vital Records

State entities are required by the State Records Management Act to identify "records essential to the functioning of state government in the event of a major disaster." Vital records (also known as essential records) contain information critical to the continued operation or survival of an organization during or immediately

following a crisis. (NOTE: See Vital Records Handbook for further instructions.) Such records are necessary to continue operations without delay under abnormal conditions. Vital records often only make up 3-7% of an organization's records and information.

## Vital Records Must Be Stored in 1 of 3 Ways:

- Cloud storage.
- Duplicate copy stored at least 20 miles away from the main office.
- Fireproof safe located in the office.



Vital records must remain accessible and usable while still being secure. What's vital for one organization may not be vital for another. State entities should use their mission statement as a guide for determining which records are truly vital. Records should be reviewed every few years to determine they still merit vital status.

## Possible Examples of Vital Records:

- Contracts
- Leases
- Policy manuals
- Articles of incorporation
- Blueprints
- Maps
- Customer records

- Corporate papers
- Laboratory notebooks
- Policy or procedure manuals
- Deeds
- Cultural artifacts
- Continuity of Operations Manual
- Personnel List

<sup>&</sup>lt;sup>1</sup> Government Code §12274(b)

#### The 3-2-1 Rule

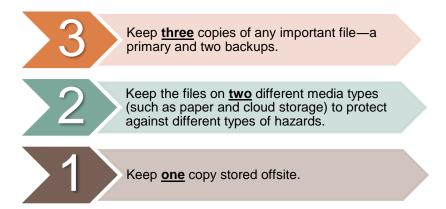


Figure 7. 3-2-1 Rule

One method for protecting your records is the 3-2-1 rule. While the 3-2-1 rule is an ideal arrangement for storing vital records, it may not always be possible. Taking the time to duplicate a record into a second media type may be impractical for program staff who are busy creating and using the records. Best practices, however, still require three copies and some physical separation between those copies.

#### The Importance of Managing Vital Records

If vital records are managed properly, the State entity is protected. If vital records are not managed properly, the State entity may be exposed to risks such as noncompliance, loss of asset value, and high costs associated with restoration and duplication. While vital records may be stored for lengthy



periods of time, records should be classified as vital only so long as they support critical business processes. When records lose their vital status, they should be reclassified.

State entities are encouraged to develop their own vital records policies and procedures. These might include a list of all vital records held by the State entity, equipment and supplies needed to maintain vital records, contact lists of staff who manage vital records, emergency resources, and any other standard operating procedures.

When determining which records are vital, State entities should consult with their emergency coordinators, review their statutory and regulatory responsibilities, and consult existing emergency plans. Vital records will be discussed more in the Records Retention Schedule portion of this Handbook.

#### Information Classification

An emerging consideration affecting records management is that of information classifications. State entities must consider the confidentiality, integrity, and security requirements of the information assets, including information systems, information system components, and information repositories (both electronic and paper), per State Administrative Manual (SAM) Section 5305.5.

There are many statutes, regulations, and rules which govern the classification of information assets contained in State records. Records Management Coordinators (RMC) are encouraged to consult with their Human Resources, Legal, Information Technology, and Administrative units to determine what classifications may apply to the State entity's records.

## **Examples of Information Classification:**

- Information Practices Act (Government Code §§1798-1798.78)
- California Public Records Act (Government Code §§6250-6276.48)
- IRS Tax Information Security Guidelines for Federal, State and Local Agencies (IRS Pub. 1075)<sup>2</sup>
- California Office of Health Information Integrity (CalOHII) Statewide Health Information Policy Manual (SHIPM)<sup>3</sup>

<sup>&</sup>lt;sup>2</sup> https://www.irs.gov/pub/irs-pdf/p1075.pdf

<sup>&</sup>lt;sup>3</sup> http://www.chhs.ca.gov/OHII/Pages/SHIPM.aspx

## CHAPTER 5

### **Records Retention Schedule**

#### What is a Records Retention Schedule?

A <u>Records Retention Schedule (STD.73)</u> lists all records received, created, used, and maintained by a State entity, as well as the retention and disposal information for those records. The Retention Schedule includes records in all formats—electronic, film, magnetic, and paper.

## Statutory Authority:

The <u>Records Management Act</u> states that the Secretary of State shall establish, "standards, procedures, and techniques for effective management of records." The Records Retention Schedule (STD. 73) is the mechanism used by the Secretary of State to manage the State's records.

The titles, descriptions, and treatment of the records series listed on the Retention Schedule must be written in an uncomplicated style that can be understood by persons unfamiliar with the business process of the submitting State entity.

Prior to submission, the Records Management Coordinator (RMC) should ensure the Record Retention Schedule has been reviewed and approved by the program manager responsible for the records. The program manager of the office where the records are located signs the Retention Schedule as the agent authorized to approve the retention and destruction periods for those records.

# Who is Responsible for the Records?

The program manager in charge of the office for which the Retention Schedule is being created is considered the custodian for those records.

<sup>&</sup>lt;sup>1</sup> State Records Management Act (<u>Government Code §§12270-12279</u>)

After the Retention Schedule has been approved by CalRIM and SRAP, and an approval number has been assigned, the approval number may be used as authority for transferring records to the State Records Center (SRC). State entities are required to have a current Retention Schedule and approval number in order to conduct any scanning/imaging projects. An approval number may also be used to locate the Retention Schedule on <a href="Athena">Athena</a><sup>2</sup>, the State Archives online database of Records Retention Schedules. The RMC will use the approval number if the Schedule needs to be amended, or when the Schedule must be revised five years after the approval date.

Once the RMC receives the approved Records Retention Schedule, they should disseminate copies of the Schedule to the program manager of the unit and to the program staff who work with the records on the Schedule. See Chapter 6, "Approval of Records Retention Schedules" for more details.

#### What is the Purpose of a Records Retention Schedule?

Having an updated Retention Schedule saves both physical and electronic storage space. If records are not disposed of on a regular basis, they pile up in office corners or overburden share drives with files that are no longer needed to conduct daily business.



Retaining and disposing of records according to the Retention Schedule creates a regular, controlled flow of records through the office. Records may move through multiple storage locations throughout their life, such as internal office storage, external storage facilities like the State Records Center (SRC), and secure vault storage, before their ultimate disposition either to preservation at the State Archives or to scheduled destruction.

<sup>&</sup>lt;sup>2</sup> http://www.sos.ca.gov/archives/programs/state-records-appraisal/athena/

All records created, received, maintained, and used by a State entity in the performance of its duties must be identified and listed on the Retention Schedule. By listing records held by a State entity, the Schedule provides an overall outline of how the entity operates and which units work with the records. The Retention Schedule also ensures compliance with statutory and legal recordkeeping requirements by identifying which requirements apply to the records.

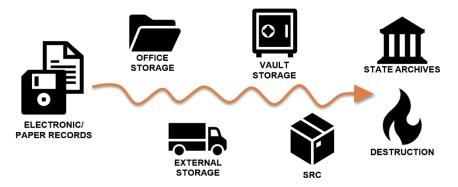


Figure 1. Flow of Records

There are additional benefits to having a current approved Records Retention Schedule. When creating a Retention Schedule, a State entity performs an analysis of current business processes, which may lead to improvements in how the entity conducts its business. A current Retention Schedule protects a State entity from legal action by ensuring obsolete records are destroyed with proper authorization and in accordance with the law. In addition, a current Retention Schedule ensures that records of historical importance are transferred to the State Archives for preservation.

## A Records Retention Schedule Shall:

- Cover all records created and maintained by the State entity.
- Provide an accurate description of each record series.
- State the period each record series should be retained in office, department, and/or external storage before destruction or transfer to the State Archives.

#### The Records Retention Schedule Process



The information needed to create a Retention Schedule begins with program staff. Program staff are the employees who create/receive and use the records to conduct the State entity's business. These employees should know the contents, use, and necessary retention for the records listed on the

Schedule. Program staff should identify the records held by the State entity and share this information with the records management team to create the Retention Schedule.

The records management team should take the information from the program staff and format that information into the Records Retention Schedule. If there is a Records Management Assistant Coordinator (RMAC) assigned to the unit, the RMAC should work directly with program staff to conduct an inventory of their records and convey the information from that inventory to the Records Management Coordinator (RMC). The RMC and RMAC should enter the records found during the inventory into the Records Retention Schedule.

The completed Retention Schedule is sent to the Secretary of State's California Records and Information Management (CalRIM) program. The Records Management Analysts at CalRIM will review the Schedule to ensure it meets all formatting requirements. CalRIM may return the Retention Schedule to the RMC for correction.

Once the Retention Schedule is approved by CalRIM, it is forwarded to the State Record Appraisal Program (SRAP) where the Archivists will review the Schedule for any records which may be of historical interest. The Archivists will identify records that should be sent to the State Archives after the records have reached the end of their

retention. Once the Archivists have completed reviewing the Retention Schedule, the Schedule will be returned to the RMC.

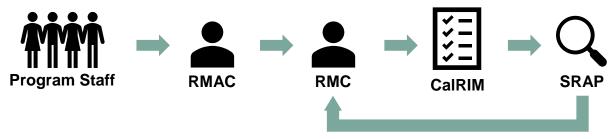


Figure 2. Records Retention Schedule Process

## **Approval of Records Retention Schedules**

#### **CalRIM Approves the Retention Schedule**

The Secretary of State has assigned the California Records and Information Management (CalRIM) program the task of approving Records Retention Schedules (STD. 73). When a Retention Schedule is approved, the State entity is authorized—for a five-year period—to dispose of the records listed on that Schedule. No further



approval for disposition is necessary, unless the information on the Retention Schedule is changed. If the records, retention periods, or other information on the Schedule have changed, the Schedule must be revised or amended to reflect the changes.

A Retention Schedule's approval number expires after five years. When the five years have elapsed, the Retention Schedule is considered expired and must be revised. If a Retention Schedule has expired, the State entity will not be permitted to transfer records from that Schedule to the State Records Center (SRC) until the Schedule is revised.

#### **Approval Procedure**

Below are the general steps for submitting a Records Retention Schedule for approval.

#### Submitting the Schedule for Review

When the Records Retention Schedule is complete, the RMC should email an electronic version of the form to their CalRIM Records Analyst for review. The list of Records Analyst assignments<sup>1</sup> is located on the CalRIM website.

<sup>1</sup> http://archives.cdn.sos.ca.gov/calrim/pdf/2017oct-calrim-agency-assignments.pdf

#### **Submitting an Organizational Chart**

When submitting a Retention Schedule, the RMC must include a current organizational chart for the State entity. The chart must highlight the location of the unit the Schedule belongs to within the State entity as a whole. Having this information allows the State Archives to review Retention Schedules within the context of their State entity.

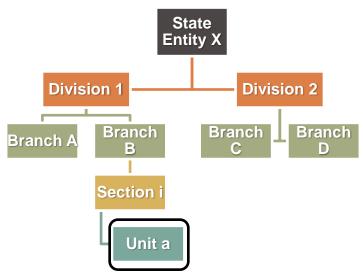


Figure 2. State Entity Hierarchical Structure Example

#### **Mailing the Final Paper Copy to CalRIM**

Once the CalRIM Analyst says the Retention Schedule is ready to be submitted, the RMC will print out the final copy. Both the RMC and the manager in charge of the records must sign the Schedule. The signed Schedule shall be mailed to the State Archives at the following address:

California State Archives (IMS D-15)
CalRIM Unit
Attn: (Insert Records Analyst name here)
1020 O Street
Sacramento, CA
95814

#### **Approval Number Assigned**

After receiving the mailed paper Schedule, the CalRIM Analyst will assign an approval number to new and revised Schedules. Amendments to previous Schedules retain the same approval number as the previous Schedule. Each approval number is unique. No two Retention Schedules have the same approval number, though several Schedules may have the same schedule number. Thus, the approval number is the easiest means to identify a specific Schedule.

#### **Approval Date Assigned and Expiration Date Set**

The approval date is the day the CalRIM Analyst approved and signed the Schedule. If the Schedule is being amended, the approval date will remain the same as on the previous Schedule. If it is a new Schedule or a revision to a previous Schedule, the expiration date in will be exactly five years from the approval date. For example, if a revised Schedule was approved on January 31, 2018, that approval number will expire on January 31, 2023.

## **Documents to Email to CalRIM:**

- Draft Records Retention Schedule
- Summary of Changes (if applicable)
- Organizational Chart

### **SRAP Approval**

Once the CalRIM Analyst signs the Retention Schedule, it is forwarded to an Archivist in the State Records Appraisal Program (SRAP). The Archivist will review the Retention Schedule looking for records series with potential historical value.

The reviewing archivist will identify records series that appear to have historical or research value with the statement "Notify Archives". If a records series is identified, when it reaches the end of its retention period, the RMC must notify the State Archives and arrange for the transfer of the records to the State Archives.



When a record series is identified, it does not necessarily mean the records will go to the State Archives at the end of their retention. The "Notify Archives" statement indicates the Archivists may be interested in the records and will want to inspect them further before the records are disposed of.

Once the SRAP Archivist has reviewed the Retention Schedule and identified any records series of potential historical interest, the Archivist will sign and approve the Schedule.

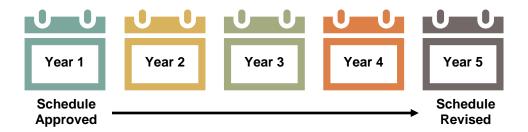
A copy of the Retention Schedule will be emailed to the State entity's RMC, as well as being uploaded to Athena where it will be available to the public. A paper copy will also

be sent to the RMC in the mail.
In addition to the paper Retention
Schedule, the Archivist will also
mail the RMC a sample of the
Archives Identification Label.
These labels are intended to be
placed on any boxes or storage
containers which hold potential
archival material.



#### The Life of a Records Retention Schedule

After a Retention Schedule is approved and returned to the RMC, the approval number is valid for five years. If any changes need to be made to the Schedule before the approval number expires, the RMC may submit an amendment to the Schedule.



When a Retention Schedule's approval number is expiring, the RMC may submit a revision to the Schedule up to six months before the expiration date. If changes need to be made earlier than six months before the expiration date, an amendment must be submitted, not a revision. Amendments and revisions to Retention Schedules will be discussed further in Chapter 8, "Amendments and Revisions".

## **Implementing Records Retention Schedules**

#### **Implementing Schedules**

The purpose of a Records Retention Schedule is to establish an orderly process for the creation/use, transfer, and ultimate disposition of records. When a Schedule is implemented properly, records will be retained only so long as they are useful for the State entity's business practices. As soon as a record is no longer needed in a storage area, it should be transferred along. When records have passed their final retention period, they must be disposed of.

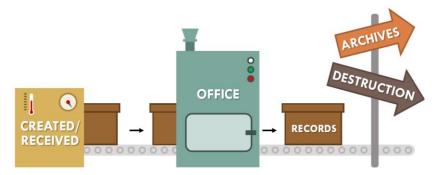


Figure 1. Regular Flow of Records

A Records Retention Schedule is of little value unless it is applied regularly. If, after the initial inventory and purge of records, the Schedule is ignored, expired records will once again accumulate. Retaining expired records in any storage facility—the office, departmental storage, external storage, etc.—costs money and makes it difficult to find current records that are needed to conduct the State entity's business.

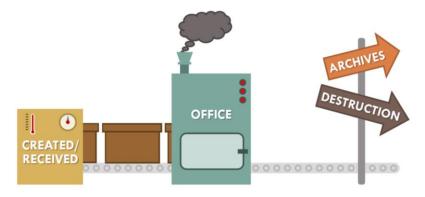


Figure 2. Blocked Flow of Records

Depending on the State entity's needs, records should be transferred and destroyed according to the Retention Schedule on a quarterly, semi-annual, or annual basis. Technically, records become ready for transfer or destruction every day of the year. But disposing of records on a daily basis may be impractical and inefficient. If records accumulate rapidly, it may be necessary to transfer or destroy them more frequently.

When arranging the transfer and destruction of records, it is important to refer to the records' retention periods on the Schedule as well as the State entity's business practices.

#### **First Steps**



Once the Records Retention Schedule has been approved and returned to the Records Management Coordinator (RMC), the Retention Schedule should be distributed to program staff who work with the records listed on the Schedule. The staff who work with the records on a daily basis will most likely be responsible for disposing of the records. It is very important that program staff are informed of the retention periods for the records they work with. It

may be a good idea to post a copy of the Retention Schedule in the office where program staff may readily access it.

Program staff should be able to use the Records Retention Schedule (STD. 73) and the Records Inventory Worksheet (STD. 70) to find information regarding the disposition and location of each record maintained in the office. If there is ever a question of how long a record should be retained, the information from the Inventory and

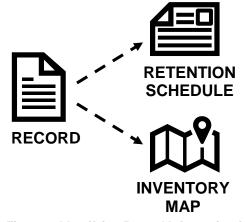


Figure 3. Identifying Record Information from the Schedule & Inventory

the Schedule may be used to determine the retention period.

Program staff should be encouraged to look for records stored in the office that have passed their retention period. Expired records should be disposed of according to the Records Retention Schedule. If staff are unsure about a record, they should contact the RMC for their State entity. Empowering staff to properly dispose of records on a regular basis will help ensure a regular flow of records through the office.

If the Retention Schedule contains any records identified with the "Notify Archives" statement, the locations of these records within the office should be labeled with the Archives sticker.

Electronic records should also be organized, transferred, and destroyed according to the Retention Schedule. Program staff should ensure electronic records are securely stored and backed up on a regular basis. The RMC may wish to implement file naming conventions to make electronic records easier to find. For records like emails, RMCs may consider using automatic deletion/destruction to make sure records are purged on a regular basis.

#### **Ongoing Efforts**

Records management should be incorporated into onboarding training for new employees. If the State entity conducts regular new employee orientations, records management policies and procedures should be included. The RMC or RMAC should make sure all new staff receive a copy of the Records Retention Schedule for their unit.

It may be a good idea for the RMC to promote an annual purge day or week where staff are encouraged to dispose of expired records according to the Retention Schedule. Highlighting the proper destruction of records helps



remind staff that not all records need to remain in the office permanently.

The RMC should regularly check in with units within their State entity to ensure records are being handled according to Retention Schedule. If there are RMACs assigned to each unit, the RMC and the RMACs should meet regularly to discuss records management topics and to make sure the State entity's policies and procedures are being properly applied.

#### **Destroying Records**

Once a record has reached the end of its retention period, if it has not been identified "Notify Archives" the record may be destroyed. CalRIM has developed a Records Destruction Log¹ to assist State entities with tracking the destruction of their records. The Destruction Log is an internal document for the State entity's use and are not submitted to CalRIM. Because the Log is a document for internal use, State entities may alter the Destruction Log or develop their own to suit their business needs.

The Destruction Log itself is a record and should be included on the Records Retention Schedule. Therefore, the Destruction Log may be included in a Public Records Act (PRA) request and would be discoverable per the PRA. State entities should keep in mind that Destruction Logs should be maintained consistently. If there is a lapse in maintaining the Destruction Log and records are destroyed without being included, there is the potential risk of the State entity appearing to hide the destruction of records.

## **Establishing Policies and Procedures**

It is the responsibility of each State entity to develop records management policies and procedures. These policies and procedures should outline how records are treated throughout the State entity and may include sections on how to treat emails, social media, electronic record naming conventions, confidential record security and access, destruction, etc. When developing these policies and procedures, State entities should

<sup>&</sup>lt;sup>1</sup> http://archives.cdn.sos.ca.gov/calrim/cr1-destruction-log-sample.docx

consult their Human Resources, Legal, Information Technology, and Administrative departments to ensure that all applicable laws and regulations are being followed.

The Retention Schedule is <u>not</u> a policy or procedure in and of itself. The Schedule is a supporting document that should be accompanied by more detailed and robust policies and procedures. It is important to remember that the Retention Schedule is itself considered a record and may be discoverable in any litigation or Public Records Act requests.

#### **Information Governance**

State entities should create specific policies and procedures regarding the information governance of information assets contained within their records. Information governance is the specification of decision rights and an accountability framework to ensure appropriate behavior in the valuation, creation, storage, use, and deletion or archival of information.2

While records are in the possession of State entities, it is their responsibility to maintain the integrity and accessibility of their records while ensuring the records comply with data security and privacy requirements. Records management, cyber security, and data privacy must all be done in concert. The RMC cannot ensure proper information governance alone. Records management and information governance must be made a priority at the highest levels of the State entity.

#### What is Information Governance?

Information governance is the specification of decision rights and an accountability framework to ensure appropriate behavior in the valuation, creation, storage, use, and deletion or archival of information.

<sup>&</sup>lt;sup>2</sup> https://www.gartner.com/it-glossary/information-governance/

## **Records Management Implementation Checklist**

$\checkmark$	Activity
	Distribute Records Retention Schedule to program staff who work with the records listed on the Schedule.
	Post a copy of the Retention Schedule in a common area of the office and on shared drives.
	Look for records in the office that have passed their retention period.
	Use Archives sticker to mark the locations of records identified with the "Notify Archives" statement.
	Ensure electronic records are securely stored and backed up on a regular basis.
	Develop file naming conventions for electronic records.
	Consider implementing automatic deletion/destruction for appropriate electronic records.
	Present records management policies and procedures at new employee orientations.
	Provide new staff with a copy of the Records Retention Schedule for their unit as well as records management policies and procedures.
	Coordinate periodic purge days or weeks to dispose of records that have reached the end of their retention period.
	Regularly check in with units to ensure records are being handled according to Retention Schedule.
	Set up regular meetings between RMC and RMACs.
	Develop procedure for destruction log (if using).
	RMC, or designated staff, may be present for confidential shredding, either performed in-house, at the SRC, or at another contracted facility.
	Develop records management policies and procedures in conjunction with Human Resources, Legal, Information Technology, and Administrative departments.
	Develop information governance policies and procedures for records.
	Distribute records management-related policies and procedures to all staff.
	Include RMC in all records management-related communications. The RMC should be the main point of contact for the State entity when communicating with the State Archives, the SRC, etc.

## **Amendments and Revisions**

#### **Maintaining Records Retention Schedules**

Records Retention Schedules must be kept up-to-date if they are to be of value. It is imperative for State entities to update Records Retention Schedules to ensure the records series on the Schedule are being retained and disposed of properly. If a State entity disposes of records improperly, in any manner other than the disposal outlined in the Retention Schedule, the State entity will be out of compliance with the State Records Management Act<sup>1</sup>.

Once a Retention Schedule is created, there are two methods for updating it: an amendment and a revision. Amendments are made during the five-year period in which a Retention Schedule is approved. Revisions are made at the end of the five-year approval period.

A Retention Schedule may be revised within six months before the expiration date. If changes need to be made earlier than six months before the expiration date, an amendment must be submitted.

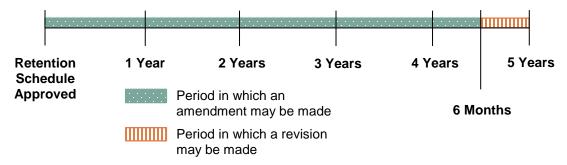


Figure 1. Amendment & Revision Period Chart

<sup>&</sup>lt;sup>1</sup> Government Code §12275(a)

#### **Amending Records Retention Schedules**

During the five-year period after a Retention Schedule is approved, any changes to that Schedule must be documented with an amendment. Changes may include adding, deleting, or reorganizing records series within the Schedule, updating record descriptions or remarks, noting unit/program name changes, etc. Schedules also need to be amended to reflect any new or different business practices which may affect the existing function of records series.

To create an amendment, fill out the <u>Records Retention Schedule (STD. 73)</u> and indicate an amendment is being made to a previous Schedule. The previous schedule and approval numbers must be included.



Any change or addition to a Schedule should be made promptly, and news of the change should be immediately dispersed to those using the Schedule. If staff who use the Retention Schedule are not notified of a change, there is a danger of records being mishandled or even destroyed before their retention period has ended.

CalRIM may require a State entity to amend a Retention Schedule to retain specific records for a shorter or longer period if it appears necessary to protect the interests of the State. In such cases, CalRIM will notify the State entity that specific records on the approved Retention Schedule must be retained for a different period of time.

An amended Schedule will retain the schedule number of the previous approved Retention Schedule. At the end of the schedule number, it is helpful to add an amendment number (i.e.: A1, A2, etc.). This will help differentiate between the original, approved Schedule, and any subsequent amendments.

#### **Revising Records Retention Schedules**

Retention Schedules are valid for five years from their approval date. When the five years have elapsed, the Retention Schedule is considered expired. Until an expired Retention Schedule is revised, the State entity may not destroy or send to the State Records Center (SRC) records listed on the Schedule.



"A record shall not be destroyed or otherwise disposed of by an agency of the state, unless it is determined by the Secretary of State that the record has no further administrative, legal, or fiscal value and the Secretary of State has determined that the record is inappropriate for preservation in the State Archives." (Government Code §12275(a))

It is important for State entities to revise their Retention Schedules every five years to ensure the information on the Schedules continues to be accurate. Business practices may have changed since a Retention Schedule was last approved. Some records series may no longer be used, or the treatment of a record series may have changed, or new records series may have been created, etc.

A Retention Schedule may be revised up to six months before the expiration date. If changes need to be made earlier than six months before the expiration date, an amendment must be submitted.

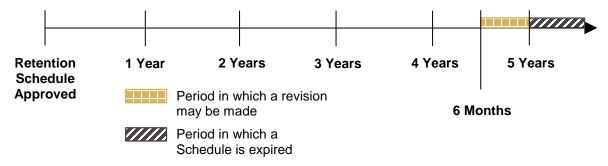


Figure 2. Revision & Expiration Period Chart

To create a revision, fill out the <u>Records Retention Schedule (STD. 73)</u> and indicate a revision is being made to a previous Schedule. The previous schedule and approval numbers must be included.

#### **Summary of Changes**

A Summary of Changes must be included when amending or revising a Retention Schedule. The Summary must outline any and all changes being made to the records series on the Retention Schedule. This document is necessary for staff at the State entity, for the CalRIM Analysts, for the Archivists in SRAP, as well as for any member of the public reading the Schedule to be able to track the changes made to a Retention Schedule over time.

## **CHAPTER 9**

## **External Storage for Records**

#### When to Store Records Outside the Office

There are times when records may be transferred to external storage outside of the office where they are created/received/used. When records are no longer needed to conduct daily business, they may be transferred to a lower-cost storage facility. State entities may contract with a company of their choosing for external storage or they may store their records at the State Records Center (SRC).

#### **Requirements for External Storage**

Before sending records—regardless of format—to be stored outside the office, State entities must inform CalRIM and ensure the external facilities meet the following qualifications to ensure the security and safety of the records.

External record storage facilities must meet the following qualifications:

- 1) Fireproof storage of records with safety precautions in place in case of a fire.
- 2) Security protections commensurate to the security level of the record contents.
- Distance from locations of probable natural disasters (flood plains, tornadoes, wildfires, etc.).
- 4) Clean facilities.
- 5) Regulated temperatures.

## **Statutory Authorities:**

"Agencies may not establish and/or create new facilities to store their records without prior written approval by CalRIM." (State Administrative Manual, Section 1621)

"Each state entity shall establish an alternate storage site, including the necessary agreements to permit the storage and recovery of backup information. Each state entity shall ensure that the alternate storage site provides information security safeguards equivalent to that of the primary site." (State Administrative Manual, Section 5325.4)

#### The State Records Center (SRC)

Under the Department of General Services (DGS), the SRC provides offsite storage for State entities' records. State entities still have access to records stored at the SRC and may request records be returned at any time. The SRC also provides confidential and non-confidential destruction of records that have reached the end of their retention period. State entities will be notified and must sign off before records stored at the SRC may be destroyed. The SRC charges a fee for its services. For more information regarding fees and services, contact the State Records Center.

#### **State Records Center**

Office of State Publishing 3240 Industrial Blvd. West Sacramento California, 95691 (916) 375-6760

StateRecordsCenter@dgs.ca.gov

http://www.dgs.ca.gov/osp/Programs/StateRecordsCenter.aspx

<sup>&</sup>lt;sup>1</sup> https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam\_master/sam\_master\_file/chap1600/1621.pdf

<sup>&</sup>lt;sup>2</sup> https://www.documents.dgs.ca.gov/sam/SamPrint/new/sam\_master/sam\_master\_File/chap5300/5325.4.pdf

The SRC should be used by State entities to store records which must still be retained but are not needed for day-to-day operations. Records that are referred to on a monthly or yearly basis are considered to have medium to low reference status and are good

candidates for offsite storage. The SRC should <u>not</u> be used as a burial ground for "dead" records. It should contain records accessed infrequently enough to justify offsite storage, but which must be available for a specified time period, on an intermittent basis, or to satisfy legal requirements.



Figure 1. The SRC is NOT a burial ground for records

Records should <u>not</u> be stored at the SRC permanently. Records may be stored at the SRC for a maximum of 50 years.<sup>3</sup>

#### **Ordering Records Storage Boxes**

The transferring State entity may order Records Storage Boxes through normal supply channels. State entities should not use "banker boxes" when sending records to the SRC. SRC staff will replace damaged Records Storage Boxes. They will <u>not</u> replace damaged "banker boxes". The Records Management Coordinator (RMC) will have to come to the SRC to replace damaged "banker boxes".







Figure 2. Record Storage Boxes

Chapter 9 - External Storage for Records

<sup>&</sup>lt;sup>3</sup> Government Code §12274(c)

State entities may purchase Records Storage Boxes from the following three vendors:

## C&C Express Delivery

(916) 296-1685

Item #: FB2150

## Oakland Packaging & Supply

(916) 447-8384

Website<sup>1</sup>

Item #: 107911112

## River City Office Supply

(916) 446-4084

Website<sup>2</sup>

Item #: DIR151210

#### **Packing Records Storage Boxes**

Pack records upright in storage boxes in the same manner they were maintained in agency files. For example, file folders that were stored together in the same drawer should be placed together into a box.

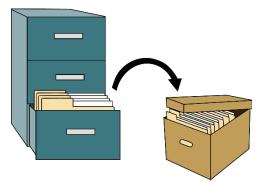


Figure 3. Properly Packed Boxes

Place records into boxes in an organized fashion. Do not overstuff boxes. Leave enough room for grasping the box through the handle openings. Remove all paper clips, binder clips, etc. Boxes should not contain any markings other than the Transfer List and box numbers.





Figure 4. Improperly Packed Boxes

<sup>&</sup>lt;sup>1</sup> http://www.oakpackaging.com/

<sup>&</sup>lt;sup>2</sup> http://v501.britlink.com/P274/RiverCity

#### **Transferring Records to the SRC**



Transportation is not provided by the SRC.

Pickup and delivery service for transfers in the

Sacramento Area of five to ten boxes or less may
be scheduled through the State's Interagency

Mail and Messenger Service. Transportation for
transfers are at the expense of the State entity

and may be accomplished using Master Services Agreements with local transport services.

When transferring confidential records or records with specific security and access requirements, it is the responsibility of the State entity to ensure the records are properly protected during transportation to external storage facilities.

## CHAPTER 10

## **Disposition of Records**

A record may be disposed of when it has reached the end of its retention period. Disposition of records may entail destroying paper and electronic records, confidentially destroying records, or transferring records to the State Archives if they have been identified as "Notify Archives" on the Retention Schedule.



Figure 1. Types of Disposition of Records

The State Archives must be notified before any records with potential historical value may be destroyed. A record identified with the "Notify Archives" statement may be destroyed only once it is determined by the Secretary of State that the record has no further administrative, legal, or fiscal value and the Secretary of State has determined that the record is inappropriate for preservation in the State Archives.<sup>1</sup>



While there may be some reluctance to destroy records, this is an important part of the Records Management Program. If no records are ever destroyed, State entities would be drowning in obsolete records that are no longer useful to conduct business. Also, State entities are liable for all records they retain in the event of a Public Records Act request or any kind of legal action.

Paper records may be destroyed several ways: in-house recycle, shred, or confidential destruction; the State Records Center (SRC) and Document Destruction Center; or a contract vendor. When using a contract vendor for confidential destruction, State entities should provide a witness who is a State employee to ensure the records have been properly destroyed. The Records Management Coordinator (RMC) may be tasked

<sup>&</sup>lt;sup>1</sup> Government Code §12275(a)

with witnessing confidential destruction of records. The method of records destruction should be documented in the State entity's policies and procedures.

#### **In-House Destruction**

The State of California does not have a designated in-house records destruction procedure. However, the confidentiality of a record's contents must be considered when deciding the level of security used in that record's destruction. For example, records that contain sensitive personal information must be destroyed using witnessed confidential shredding. If a record is less sensitive, it may be destroyed using regular recycling. A State entity may encourage recycling of non-sensitive records to promote the reuse of paper resources.

Records awaiting destruction should be stored securely according to the confidentiality of their contents. Records identified for confidential witnessed destruction should be stored in confidential shredding bins to ensure the records cannot be accessed by unauthorized persons.

To assist State entities with documenting what records they have disposed of, CalRIM created a Records Destruction Log (Form CR-1)<sup>2</sup>. State entities may use this form to record such information as the disposition date, authorization (Records Retention Schedule number and Item number), volume, medium, and any remarks pertinent to the disposition of the record. The Records Destruction Log is designed to document the destruction of both paper and electronic records. The Log is an internal document for the State entity's use and is not submitted to CalRIM, therefore, State entities may alter the Destruction Log or develop their own to suit their business needs.

<sup>&</sup>lt;sup>2</sup> http://archives.cdn.sos.ca.gov/calrim/cr1-destruction-log-sample.docx

#### **SRC Record Destruction**

Records stored at the State Records Center (SRC) are not automatically destroyed when they reach the end of their retention period. When a record's retention period ends, the SRC will notify the depositing State entity using an Authorization for Records Destruction report. The records will be destroyed when the original copy of the report has been returned to the SRC showing the RMC's signature, and indicating that the records are approved for destruction, or justifying an extension for the records in question. If the Authorization for Records Destruction report is not returned to the SRC within 60 days, the depositing agency will be billed for an additional quarter.

#### **Transferring Records to the California State Archives**

If a record was identified as having potential historical value, it must *not* be destroyed at the end of its retention period without the permission of the California State Archives. The potential historical value of a record is determined by the State Archives<sup>3</sup> and is identified on the Retention Schedule with the "Notify Archives" statement.



Figure 2. Notify Archives Sticker

If a record series is identified "Notify Archives" this does not necessarily mean the records will go to the State Archives at the end of their retention. The "Notify Archives" statement indicates the Archivists *may* be interested in the records and will want to inspect them further before the records are disposed of.

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<sup>&</sup>lt;sup>3</sup> Government Code §12224

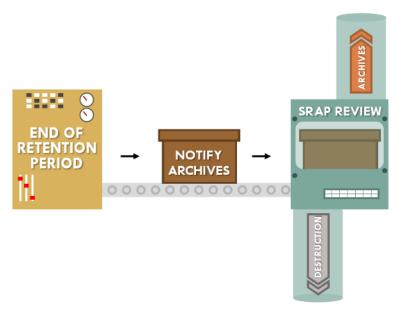


Figure 3. Records with potential historical value must be reviewed by the State Archives before they may be destroyed

When records with potential historical value reach the end of their retention period, the Records Management Coordinator (RMC) for the State entity shall contact the State Records Appraisal Program (SRAP)<sup>4</sup> regarding the transfer of the records to the State Archives.

In most instances, the SRAP Archivists will provide instructions for transferring the records to the State Archives. In some cases, however, the SRAP Archivists may seek additional information about the record series to determine if all, part, or none of the record series should be transferred. If SRAP determines that a "notify archives" record does not have lasting historical value, that record may then be destroyed.

#### **Preparing Records for Transfer to the State Archives**

Once SRAP has determined a record has historical value, the State entity must send the record to the State Archives. The following steps should be taken when sending records to the State Archives:

Chapter 10 – Disposing of Records

<sup>&</sup>lt;sup>4</sup> <u>SRAP@sos.ca.gov</u>, (916) 653-7715

- Records must be packed in an upright position. Records should be arranged in the same way they are maintained in the State entity's files. Do not create a new filing system.
- 2. Avoid over-packing boxes. Retrieving, shelving, and filing information is difficult with an over-packed box.
- 3. All records should be kept in manila folders when possible. Records sent to the State Archives should not contain hanging files, metal fasteners, or rubber bands. Hanging files and metal fasteners rust and damage records and rubber bands deteriorate, mixing records together and damaging the records.
- Standard letter- and legal-sized records should be sent to the State Archives in the same type of Record Storage Boxes used to send records to the SRC.
- Figure 4. Record Storage Box
- 5. A copy of the Records Transfer List (STD. 71)<sup>5</sup> must be placed in Box 1.
- 6. Once records are ready to transfer to the State Archives, the State entity's RMC shall contact SRAP staff to alert them of the transfer.
- 7. Records are to be delivered to:

California State Archives 1020 O Street Sacramento CA 95814

#### **Records at Risk**

The Secretary of State has the authority to take possession of records determined by the State Archives to have archival value and to be at risk of damage or loss, or in poor physical condition.<sup>6</sup> Records retained at the State Records Center (SRC) are not exempt from this rule. The Secretary of State will notify the head of a State entity no less than ten days before at-risk records are to be transferred to the State Archives. Once the records are retained at the State Archives, all statutory requirements

<sup>&</sup>lt;sup>5</sup> http://archives.cdn.sos.ca.gov/pdf/calrim-std071-records-transfer-list.pdf

<sup>&</sup>lt;sup>6</sup> Government Code §12273, State Administrative Manual Section 1602

regarding the confidentiality of those records shall be enforced and the State Archives shall make the records available to authorized individuals or the public, as determined by applicable law.

# CHAPTER 11 Conclusions

#### **Reasons for Having a Records Management Program**

There are many reasons why it is essential for the State to have a robust Records Management Program. Records management allows State entities to comply with statutory and legal requirements; to save space, time, and money; to avoid litigation; to maintain the regular, controlled flow of records through the office, and much more.

#### It's the Law

California's State Records Management Act requires the Secretary of State to "establish and administer a records management program that will apply efficient and economical management methods to the creation, utilization, maintenance, retention, preservation, and disposal of state records."



State entities must work with the Secretary of State to establish their records management programs. The head of each State entity is responsible for establishing and maintaining "an active, continuing program for the economical and efficient management of the records and information collection practices of the agency."<sup>2</sup>

## Save Space, Time, and Money



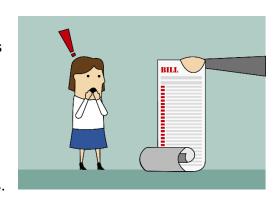
Unless records are regularly disposed of, either by destruction or by being sent to the State Archives, State entities will run out of physical storage space or incur increased costs for electronic record storage. Also, the more records

<sup>&</sup>lt;sup>1</sup> Government Code §12272(a)

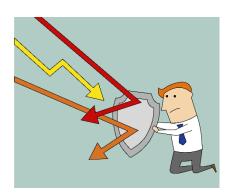
<sup>&</sup>lt;sup>2</sup> Government Code §12274(a)

a State entity retains, the more time it takes staff to search for records that are actually needed in the course of daily business. By regularly sending records to departmental or external storage, State entities ensure only the records with a high reference status are retained in the office. Records with a medium or low reference status may be stored off-site at a lower cost while still being accessible.

While it may seem like electronic records have an endless storage capacity, there are repercussions for high volume of electronic records. Cloud storage, server space, Information Technology staff time, as well as the maintenance and security of, and access to, electronic documents, all factor into the cost of storing electronic records.



#### **Avoid Litigation**



According to the Public Records Act (PRA) "each state or local agency, upon a request for a copy of records that reasonably describes an identifiable record or records, shall make the records promptly available" to the person who requested them. Any records, regardless of format, that are not exempt according to the law must be provided when a PRA request is made. When State

entities retain records past their retention period, they potentially create liabilities if those records become the subject of a PRA request.

A Records Management Program is also essential for State entities to practice proper information governance for the records they create, receive, and use. While records are in the possession of State entities, it is their responsibility to maintain the integrity and accessibility of their records while ensuring the records comply with data security and

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<sup>&</sup>lt;sup>3</sup> Government Code §6253(b)

privacy requirements. Unless State entities have policies and procedures in place to protect the security and accuracy of their records, they may be susceptible to litigation.

#### **Improving Workflow**

Records management is an essential part of State government. Properly managed records allow State entities to perform their work smoothly and efficiently, provide transparency into the conduct of the public's business, and protect personal and organizational rights and security. It is also essential to maintain a record of past actions and decisions and preserve the long-term memory of State government.

