

### **Data/Records Retention (Records Retention/Management Policy)**

The District supports a policy that provides for a systematic, routine process for the retention and/or disposal of District records. The District supports a process that:

- (1) *Provides for an effective and efficient accounting of pertinent school records;*
- (2) *Provides for the destruction of appropriate District records in a legal manner;*
- (3) *Provides for the retention/destruction of appropriate District records in accordance with state requirements;*
- (4) *Reduces the amount/cost of available storage space;*
- (5) *Reduces personnel costs involved in the retrieval of District records.*

The purpose of this process is to ensure accessibility, reduce the risk of premature disposition, and preserve records of permanent (archival) value. The following policy is established for the disposition of district records stored on optical disk.

#### **REGULATIONS:**

1. The Superintendent (or his/her designee) shall serve as the records coordinator for the District.
2. The records coordinator shall be responsible for the following:
  - a. Preparing an inventory of all agency records and annually updating same. The inventory shall include, but not be limited to, the record title; a description of the record; the status of the record (*current or obsolete*); time span of records (*earliest to latest dates*); arrangement of records (*alphabetical, chronological, numerical*); whether or not duplicate information is available elsewhere, and if so, where it is located; record format (*bound, unbound, microfilm, optical disks*); frequency of use; condition of records; whether or not any records are missing; quantity of records in cubic feet; action recommended (*destruction, microfilm optical disks, etc.*); and the recommended retention period.
  - b. Appraising district records and establishing recommended minimum retention periods for approval by the State Archivist and, Attorney General, and endorsement by the State Auditor. In determining retention periods, the records coordinator should consider:
    - (1) The function of the record;
    - (2) How often and for what the record is used;
    - (3) Whether or not the record can be found somewhere else;
    - (4) What would happen if the information were not available when requested;
    - (5) Whether or not the record protects the rights of the state or of citizens;

- (6) How easily the record could be assembled again if it were needed.

The ultimate disposition of records depends on the value that record may have at any given time. Values can be classified into four major types:

- (1) **Administrative value:** Records have administrative value as long as they assist the District in performing either current or future work. The administrative value of most records is exhausted when the transactions to which they relate have been completed.
- (2) **Legal value:** Records have legal value if they contain evidence of legally enforceable rights or obligations of the district. Examples: legal decisions/opinions, leases, deeds, title insurance policies and contracts.
- (3) **Fiscal value:** Records of fiscal value are those which pertain to the financial transactions of the district, such as budgets, ledgers, allotments, payrolls, and vouchers. After records have served their basic administrative functions, they may still have sufficient value to justify their retention in storage for a time to protect the District against court action, to account for the expenditure of funds, or to comply fiscal audit requirements.
- (4) **Historical value:** Some records have enduring value because they document the historical development of the district. They contain precedents for policies and can be used as guides in solving present problems similar to those dealt with in the past. They are valuable to the district, students, researchers, and historians as historical documentation.

It should be noted that some records will have more than one value, and all values must be considered in appraising the records.

- c. Establishing procedures to assure that disposition action is taken in accordance with approved schedules authorized by the State Archivist and Attorney General.

A records disposition schedule can be used as authority for the disposition of records only if the following conditions are met:

- (1) The appropriate form must be signed by the State Archivist, Attorney General, and the District records coordinator.
- (2) All records having fiscal value must have been officially submitted to a complete and approved audit.
- (3) Authorization for the destruction of original records after microfilming, optical scanning, (or other records retention procedure) shall be in effect only if the district has verified scanned documents (or otherwise retained

- documents) for legibility and completeness disk (or other record storage device) and has determined and certified that the record storage device) meets the minimum standards established by the State Archivist.
- (4) There have been no statutory or other changes that have occurred.
- d. Determining the format in which permanent records shall be retained (*e.g. microfiche, microfilm, optical scanning, original format, etc.*).
  - e. Ensuring that all records are stored in an efficient and cost effective manner that provides for easy access/retrieval.
  - f. Informing appropriate staff members of the proper records management/retrieval/storage procedures.
3. District officials can maintain non-permanent public records with an established retention of more that ten years in an optical disk system and dispose of the originals provided they:
- (1) maintain security copies of the disks and indexes in off-site storage;
  - (2) either migrate and convert both the working and security copies of the disks and indexes if optical systems are up-graded or changed in a way that prevents access to the contents of the disks created by the old system or recopy to new disks very ten years, whichever occurs first;
  - (3) sample both the working and security copies of the disks and indexes at least once a year to make sure the data is readable and recopy to new disks immediately if any loss of information is detected;
  - (4) obtain an authorization for disposal in advance from the State Archives.

The records retention schedules that adequately describe the records and define the period for their retention and manner of disposition must be approved by the State Archives.

4. The records coordinator will be responsible for ensuring that records are retained/scanned/destroyed on an annual basis. The retention/scanned//destruction of records shall be done in accordance with the rules and regulations of the State Archives office.
5. The District will apply procedures that protect restricted records from unauthorized access and allow access to open records. Only those employees who work with these records shall have access to them using password security to gain access.
6. To maintain system documentation that will assure continuous access to records the District will keep full documentation of:
  - Hardware and software, including brand names, version numbers and dates of

- installation, upgrades, replacements, and conversions.
  - Data structure and content, including the file layout and data dictionaries.
  - “Enhancement” algorithms.
  - Operating procedures, including methods for scanning or entering data; revising, updating, or expunging records; indexing; backing up disks, tapes, microfilm, etc.; testing the readability of records; applying safeguards to prevent tampering and unauthorized access to protected information; and carrying out the disposition of originals records. In addition, to provide audit trails, procedures for logging and tracking should be documented.
7. To maintain the quality and integrity of the electronically stored materials, they shall be verified and visually inspected, appropriate by index, labeled, backed-up and stored, refreshed as necessary, supported by migration and conversion plans and managed for any risk.

LEGAL REF.: C.R.S, **Section** 24-80-101-~~HH~~.

CROSS REF.: EHB/JRA-E1 - Records Inventory Sheet  
EHB/JRA-E2 - Student Record Information Procedures