

CITY OF SPOKANE
ADMINISTRATIVE POLICY AND PROCEDURE

ADMIN 0260-17-05
LGL 2012-0061

TITLE: PUBLIC RECORDS MANAGEMENT PROGRAM (INCLUDING OFFSITE RECORDS STORAGE AND RETRIEVAL)

EFFECTIVE DATE: January 1, 2004

REVISION EFFECTIVE DATE: November 14, 2017

1.0 GENERAL

1.1 The records of the City of Spokane are a corporate and public asset, vital for both ongoing operations and providing evidence of the City's business decisions, activities, and transactions. The purpose of the public records management program is to establish a City-wide policy and standard procedures for managing records according to the provisions of the Public Records Act and all other state and federal statutes and regulations which govern governmental agency record keeping practices, including the systematic identification and disposal of obsolete records; transfer of historically valuable records to the State Archives system; removal of non-current or seldom-used public records from active office storage; offsite records storage and retrieval; protection and security backup of records essential to agency authority and operations; disaster preparedness; insurance of records systems integrity and accessibility; and effective compliance with public disclosure requirements.

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2.0 DEPARTMENTS/DIVISIONS AFFECTED

This policy shall apply to all City divisions and departments, including boards, commissions, committees or similar entities of the City (hereinafter referred to as "department"). The Spokane Public Library has separate records management procedures.

3.0 REFERENCES

Chapter 40.14 RCW – Preservation and Destruction of Public Records
Chapter 40.10 RCW – Protection of Essential Records
Chapter 434-615 WAC – Custody of Public Records
Chapter 434-662 WAC – Preservation of Electronic Records
Chapter 42.56 RCW – Public Records Act
Washington State Secretary of State – Local Government Records Retention
Schedule
Administrative Policy and Procedure ADMIN 0260-14-06 – Imaging and
Destruction of Paper Records – “Scanning and Tossing”
Administrative Policy and Procedure ADMIN 0260-17-03 – Public Record
Requests
Administrative Policy and Procedure ADMIN 5600-17-06 – Wireless
Communication Devices (WCD), Including Cell Phones and Desk Phones

4.0 DEFINITIONS

- 4.1 City Records Officer means the City Clerk or designee.
- 4.2 Department Records Coordinator means the individual who has been appointed by his/her department director to be the contact person and coordinator for the department's records.
- 4.3 Offsite Storage Records Coordinator means the individual designated by the City Records Officer who will assist departments with offsite records storage retrieval and destruction.
- 4.4 Public Records, as defined by RCW 40.14.010, shall include any paper, correspondence, completed form, bound record book, photograph, film, sound recording, map drawing, machine-readable material, compact disc meeting current industry ISO specifications, or other document, regardless of physical form or characteristics, and including such copies thereof, that have been made by or received by the City of Spokane in connection with the transaction of public business.
- 4.5 Active records are those required for current use. Active records are typically housed within City departments and are referred to on a routine basis and are accessed more than once per month.
- 4.6 Non-current or seldom-used records are those records that have not reached the end of the retention period but are accessed infrequently. To save space, non-current or seldom-used records should be stored offsite at the City's contracted offsite records storage facility.

- 4.7 Primary record is the original record (whether created or received by the agency) which serves as the official record, and must be retained in accordance with a current approved records retention schedule.
- 4.8 Archival (appraisal required) records are those public records which possess enduring legal and/or historic value and must not be destroyed.
- 4.9 Essential records are those the City must have in order to maintain or resume business continuity following a disaster. While the retention requirements for essential records may range from very short-term to archival, these records are necessary to resume core functions following a disaster. Security backup of these public records will be created to the extent possible.
- 4.10 Records Disposition means the action(s) taken with records when they are no longer required to be retained by the agency. Possible disposition actions include transfer to archives and destruction.
- 4.11 Records retention schedule is a table, setting out requirements, approved by the Washington State Local Records Committee (created pursuant to RCW 40.14.050), which specifies the length of time each record series will be retained by the agency, whether the record is designated essential, archival, or potentially archival, and final disposition of the record.
- 4.12 Records series is a group of records, performing a specific function, which is used as a unit, filed as a unit, and may be transferred or destroyed as a unit. A records series may consist of a single type of form or a number of different types of documents that are filed together to document a specific function.
- 4.13 Disposition Authority Numbers (DAN) are control numbers systematically assigned to records series or records retention schedules when they are approved by the Washington State Local Records Committee.
- 4.14 Retention period is the minimum time that records must be kept.
- 4.15 Electronic record includes those public records which are stored in machine readable file format. Examples of electronic records include, but are not limited to, emails, text messages, audio/visual records, database records, websites, social media, imaging/scanning.
- 4.16 Secondary records are copies or duplicates of the city's primary records used for administrative purposes. Secondary records exist for convenience of reference and may be discarded when no longer needed for agency business.

- 4.17 Transitory records are those records that only document information of temporary, short-term value, provided that the records are not needed as evidence of a business transaction and are not covered by a more specific records series on the retention schedule. Examples include secondary copies of memos, transmittal memos, informal notices of meetings, directions, scheduling information, working copies, notes, general office notices, invitations to retirement parties, drafts. (Note: "Drafts" does not include documentation of the analysis and development of ordinances and/or resolutions intended for submission to a City board or City Council, which documentation has a retention period associated with it under the records retention schedule.)

5.0 POLICY

- 5.1 City employees create and use public records as part of their regular job duties, are all stewards of the City's records, and are responsible for following this Administrative Policy and Procedure (ADMIN 0260-17-05), as well as associated State policies and procedures.
- 5.2 All departments will work with their appointed Department Records Coordinator to insure that:
- 5.2.1 Only active records or records with a short-term retention value are stored on site.
 - 5.2.2 Non-current or seldom used records are transferred to the offsite records storage center on a regular basis.
 - 5.2.3 Archival records are preserved and reviewed by and/or transferred to the Washington State Division of Archives and Records Management.
 - 5.2.4 Records are destroyed at the end of the retention period specified on the records retention schedule.
 - 5.2.5 Records essential to the City's authority and operations are identified and adequately protected from damage or loss.
 - 5.2.6 All information systems preserve the integrity and accessibility of the public records they hold for the duration of their approved retention periods.
 - 5.2.7 Records are accessible for public inspection and their security is maintained according to the provisions of the Public Records Act (*chapter 42.56 RCW*).

- 5.3 All public records shall be and remain the property of the City. Outgoing officials and employees must pass such records on to their successors.
- 5.4 Public records shall be preserved, stored, transferred, destroyed and otherwise managed according to the provisions of chapter 40.14 RCW unless otherwise provided by law.
- 5.5 Original (primary) public records shall remain in the custody of the City. They shall not be placed in the custody of any other person or agency, public or private, or released to individuals except for disposition pursuant to law or as otherwise provided by law.
- 5.6 Public records shall be maintained until the end of their minimum retention periods.
- 5.7 Departments may destroy non-archival paper-based source records after they have been converted to a digital format by imaging (scanning) only after following Administrative Policy and Procedure ADMIN 0260-14-06 ("Scanning and Tossing").
- 5.8 Secondary copies are generally kept for administrative use and can be discarded when that purpose has been fulfilled, provided the primary copy of the record is retained in accordance with the minimum retention period. A records destruction notification and certification form is not necessary when disposing of secondary or convenience copies unless otherwise noted on the records retention schedule. (Reference sections 4.16 and 6.9 of this policy.)
- 5.9 Transitory records can be discarded when their purpose has been fulfilled. A records destruction notification and certification form is not necessary when disposing of transitory records. (Reference sections 4.17 and 6.9 of this policy.)
- 5.10 Records that have a retention period of one year or less may be disposed of without having to complete a records destruction notification and certification form. (Reference section 6.9 of this policy.)

6.0 PROCEDURE

6.1 Responsibilities of the City Records Officer:

- 6.1.1 Ensure that records management procedures provide for the efficient, economical and effective control over the creation, distribution, organization, maintenance, use and disposition of City records.

- 6.1.2 Ensure the availability of records retrieval in cooperation with individual departments.
 - 6.1.3 Act as a resource for department records coordinators in the management, preservation, and destruction of public records.
 - 6.1.4 Approve Records Destruction Certification forms to ensure that records are not destroyed before their legal retention date and that records with archival value are maintained.
 - 6.1.5 Coordinate with departments and the Washington State Archivist the transfer of archival records to the State Archives.
- 6.2 Responsibilities of Departments:
- 6.2.1 Appoint a Records Coordinator for the department.
 - 6.2.2 Dispose of records according to their minimum retention periods on a recurring basis. Departments should review records annually, both paper and electronic, and dispose of records that have met designated retention periods according to the established Washington State records retention schedules.
 - 6.2.3 Have their records disposed of promptly, effectively and securely.
 - 6.2.4 Destroy or transfer their public records only in accord with the instructions and approval of the Washington State Local Records Committee guidelines as administered by the City Records Officer.
 - 6.2.5 Work with the appointed Department Records Coordinator to insure that only active records or records with a short-term retention value are stored in valuable office space; and that non-current records are shifted to offsite storage on a regular basis.
 - 6.2.6 Work with the appointed Department Records Coordinator to define and identify essential records.
 - 6.2.7 Do not destroy public records before their retention period that are being converted to electronic format without approval of the City Records Officer.
- 6.3 Responsibilities of the Department Records Coordinator:
- 6.3.1 Serve as a liaison to the City Records Officer and Offsite Storage Records Coordinator.

- 6.3.2 Disseminate information received from the City Records Officer to the various sections within the department, including the department head.
 - 6.3.3 Correctly box records for storage at the City's offsite storage facility and prepare the inventory form (See Attachment A) and the Records Management Request Form. (See Attachment B).
 - 6.3.4 Identify records that have reached their legal retention and prepare them for destruction.
 - 6.3.5 Work with City staff within their departments to define and identify essential records.
- 6.4 Records Retention Schedules – Records Retention, Disposition, and Destruction.
- 6.4.1 The City's records retention schedules shall consist of the Washington State records retention schedules, as established by the State's Local Records Committee. (See Section 4.11 of Policy.) The retention schedules list records by series, provide retention periods, and describe final disposition needed. RCW 40.14 allows the City to legally destroy records only after the minimum retention period listed on the schedule has been met.
 - 6.4.2 The Washington State general records retention schedules can be found at:

<https://www.sos.wa.gov/archives/RecordsManagement/Managing-City-Records.aspx>

In addition to the minimum retention requirements specified in the Washington State general records retention schedules, there may be additional (longer) retention requirements mandated by federal, state and/or local statute, grant agreement, and/or other contractual obligations.
 - 6.4.3 Records not located on the State records retention schedules will require a specific request to the State for establishment of a retention period.
 - 6.4.4 Records Coordinators should contact the Offsite Storage Records Coordinator or City Records Officer for guidance on disposition of records with archival value (paper or electronic), as noted on the records retention schedules.

6.5 Legal Holds and Public Records Requests

Records involved in litigation or reasonably anticipated or foreseeable litigation will be placed on legal hold and must be preserved until the legal hold is released by the City Attorney's Office. If a record(s) covered by a public records request is scheduled for destruction, the record(s) must be retained until the request is filled. (Reference the Public Records Request Policy and Procedure – ADMIN 0260-17-03)

6.6 Storage Supply Boxes

6.6.1 All records for offsite storage must be placed in special storage 12" x 10" x 15" boxes. Only pre-approved boxes will be allowed. Exceptions for oversized materials will be granted only by the City Records Officer.

6.6.2 Record storage boxes should be purchased from the offsite vendor, Northwest Vital Records, Inc., by calling 299-5143, and supplying the following information:

- requestor's name
- department name
- department location
- requestor's phone number
- quantity of boxes desired
- City VISA purchasing card number and expiration date

6.7 Preparing Records For Offsite Storage

6.7.1 Remove contents from three-ring binders and Pendaflex folders and place into file folders. Also, remove any unnecessary bindings, i.e. paper clips, binder clips, sheet protectors, rubber bands.

6.7.2 Each box should contain records that have the same retention and/or destruction date.

6.7.3 Do not over-pack boxes. Boxes should have at least one (1) or two (2) inches of free space in order to allow easy access for retrieving and refiling of records and in order to allow the lifting of the box by its handles. Boxes packed improperly will be returned for repacking.

6.7.4 Write the box number [at least one (1)-inch tall in size] on each end of the box using a black permanent marker or printed labels. The box number consists of the following format: The first two digits

represent the year; the center three digits represent the department number, with the last digit, 0, omitted; and the last three digits represent the individual box number. Boxes for the year are numbered consecutively. Example: 17-026-001, 17-026-002, 17-026-003.

- 6.7.5 Complete a Records Management Offsite Request Form, available on the intranet at the City's SharePoint site ("City Clerks" – "Records Management"). (See Attachment B) Be sure the Disposition Authority Number (DAN), which is obtained from the records retention schedule, is listed on the form. Clearly identify the contents of each box.
- 6.7.6 Make three (3) copies of the Records Inventory Form; one (1) copy for placement in the box, one (1) copy for the department's records, and one (1) copy for the Offsite Storage Records Coordinator.
- 6.7.7 Contact the Offsite Storage Records Coordinator for coordinating the transmittal of the boxed records to Offsite storage.

6.8 Retrieving Offsite Records

- 6.8.1 Complete a Records Management Offsite Request Form (see Attachment B) available on the intranet at the City's SharePoint site ("City Clerks" – "Records Management"). Send the form to the Offsite Storage Records Coordinator by email (clerks@spokanecity.org).
- 6.8.2 Requests placed by the Offsite Storage Records Coordinator prior to 9:00 a.m. are delivered the same day as ordered. Orders placed after 9:00 a.m. are delivered the following workday. Same day delivery after 9:00 a.m. is considered an emergency order and will be delivered that same day at an additional charge.
- 6.8.3 Requested records are normally delivered directly to the requesting department. Authorized department employees verify correct delivery and sign and date both copies of the delivery slip form. As soon as possible, the authorized employee emails the signed delivery slip ("customer copy") to the Offsite Storage Records Coordinator at clerks@spokanecity.org.

6.9 Records Destruction

- 6.9.1 There are two (2) types of destruction services:

- a. the destruction of records located in the department which have already reached their legal retention, and
- b. the destruction of inactive records stored at the City's offsite storage facility.

Records intended for destruction need to be documented on a Records Destruction Request Form (see Attachment C) which is available on the City's SharePoint site ("City Clerks" – "Records Management").

- 6.9.2 Send the completed Records Destruction Notification and Certification Form (see Attachment C) to the Offsite Storage Records Coordinator in the City Clerk's Office who, in coordination with the City Records Officer, will review it for compliance. The Offsite Storage Records Coordinator, after coordination with the City Records Officer, will arrange for destruction of the records. For more details on this process, see Attachment D to this policy.
- 6.9.3 Public records containing personal, financial and health information and personal identification numbers **MUST** be destroyed by shredding, redacting, or otherwise modifying the personal information to make the personal information unreadable or undecipherable through any reasonable means. Confidential or sensitive public records **MUST** be reduced to illegible condition when destroyed. Contact the City Records Officer or Offsite Storage Records Coordinator for assistance.

6.10 Electronic Records

- 6.10.1 Electronic records must be retained in electronic format and remain useable and searchable for the applicable retention period. Printing and retaining a hard copy is not a substitute for the electronic version.
- 6.10.2 Electronic records must be retained and disposed of based on content rather than format. The same records retention schedule applies to electronic records as it does to paper records.
- 6.10.3 In making decisions about how long to retain electronic records, employees should first check with their Department Records Coordinator, designated department attorney, and/or the City Records Officer to ensure compliance and verify that the records are not subject to a legal hold or active public records request. Many electronic records can be disposed of at the discretion of the employee under the following guidance:

- a. If the electronic record is the primary or only copy of an official document, it must be retained for the time period specified by the records retention schedule. Once the required retention has been met, the records should be documented on a Records Destruction Request Form (see Attachment C) and follow the same process as described under Section 6.9 of this Policy.
- b. If the electronic record is transitory in nature with no administrative, legal, fiscal, or archival value, then the records can be deleted at the discretion of the user.
- c. Records created related to City business – including text messages, voicemail messages, and other electronic communications – are City records. These records therefore (1) should be managed according to the applicable records retention schedule, and (2) may be subject to disclosure under the Public Records Act. (Reference the Public Records Request Policy and Procedure – ADMIN 0260-17-3 and the Wireless Communication Devices Policy and Procedure – ADMIN 5600-17-06)

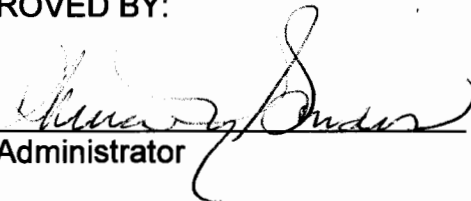
7.0 RESPONSIBILITIES

The City Clerk, with the cooperation of the City Attorney's Office and the Innovation and Technology Services Department (I&TS Department), along with each City department, shall be responsible for administering this policy.

8.0 APPENDICES

- Attachment A – Inventory Form
- Attachment B – Records Management Offsite Request Form
- Attachment C – Records Destruction Notification and Certification Form
- Attachment D – Records Management Instructions for Departments

APPROVED BY:



City Administrator

10/30/17

Date

Leri Lopez
City Clerk

10/24/2017
Date

[Signature]
I&TS Department Director

10-25-2017
Date

Michael C. Gray
City Attorney

10-24-17
Date

Records Management Forms - Instructions for Departments

FORMS:

RECORDS MANAGEMENT REQUEST FORM

NEW RECORDS INVENTORY FORM

RECORDS DESTRUCTION NOTIFICATION and CERTIFICATION FORM

Email all records management inquiries and requests, including destruction requests and requests for State Archives appraisal, to the City Clerk's email distribution list found in the Global address book under **Clerks - City of Spokane** (clerks@spokanecity.org) with the subject line reading "**Records Management Request**".

Records Management Request Form

The City contracts with Northwest Vital Records (NWVR) for offsite storage and retrieval services. The Records Management Request Form is used to (1) request existing boxes or files be retrieved from offsite and delivered to the requesting department, (2) to request pick up and return of boxes or files that have been brought back onsite and need to be returned to offsite storage, and (3) to have NWVR pick up new boxes of documents being sent offsite. Email completed forms to the City Clerk's Office, leaving the document in Word format.

Delivery Requests sent to the City Clerk's Office by 8:30 a.m. each morning are sent to NWVR by 9:00 a.m. that same day. Delivery Requests received after 8:30 a.m. will be scheduled for the following day. Requests for delivery are nearly always delivered the same day as the request. If you do not receive your box or file that day please notify the Offsite Storage Records Coordinator by emailing **Clerks - City of Spokane** (clerks@spokanecity.org).

New boxes and returns are picked up by NWVR on **Wednesdays only**. The deadline for pickup requests is 8:30 a.m. Wednesday. Pick up requests received after 8:30 a.m. on Wednesday will be scheduled for the following Wednesday.

New Boxes:

A completed New Records Inventory Form must accompany requests for new boxes to be sent offsite.

- Contact the City Clerk's Office for available box numbers (if necessary).
- Once the form has been completed:
 - send the original signed document via interoffice mail and
 - send the Word version, filling in the department head approval and date the document was signed, along with the completed Records Management Request form. The purpose of this is for efficiency in processing and for City Clerk's staff enter data from the form into the City Clerk's offsite records database.
- A more detailed inventory list of the box contents may be attached to the email and should be in either Word, Excel or and editable PDF format.
- It is acceptable to have different types of documents in a box, though the documents should have the same retention period and/or destruction date so all documents can be disposed of at the same time.

Destruction:

- Order boxes in from offsite if needed.
- Fill out a destruction form.
- Have your department head sign and date the completed form.
- Send either the original via interoffice mail or in PDF via email to the City Clerk's Office.
- The City Clerk's Office will review and initial authorizing approval of destruction and return the form to the department.

- The department will destroy the documents, sign and date the Destruction Confirmation line, indicate the method of destruction (reference Section 6.9.3 of the policy) and return the form to the City Clerk's office for final signature.
 - If the boxes are stored at NWVR and you are certain you don't need to bring the box in to review the contents you may request City Clerk's Office to have NWVR destroy the boxes at their facility.

Filling in the New Records Inventory and Records Destruction Notification and Certification forms:

Enter the Department information.

Consult the Washington State Archives website to determine the Disposition Authority Number (DAN):

The records retention schedules can be found at the links below. The PDFs and Word versions of the schedules are searchable. Choose the DAN that best fits the documents. Contact the City Clerk's Office if you have difficulty determining the DAN from the records retention schedules.

Local Government Common Records Retention Schedule (CORE) (Most types of documents will be found on this schedule.)

<http://www.sos.wa.gov/archives/RecordsManagement/UsingtheLocalGovernmentCommonRecordsRetentionScheduleCORE.aspx>

Local Government Records Retention Schedules – Alphabetical List (These schedules are more specific and pertain to documents that may not be included in CORE)

<https://www.sos.wa.gov/archives/RecordsManagement/Managing-City-Records.aspx>

Columns on the forms:

- **Box Number:** enter the number of the existing box or
 - to receive a box number for documents that have never been sent offsite and are ready for destruction contact the Clerk's Office
 - large batches of documents being destroyed onsite at the same time may all be lumped under one box number no matter how many actual boxes the documents would have filled
- **Record Series (Title/Contents):** enter the title (first line in the Description of Records in the records retention schedule) and add a brief description of the records including the year of the records
- **Retention and Disposition Action:** listed in the records retention schedules in the column of the same name
- **Scheduled Destruction:** Calculate the destruction date by adding year of the document, plus the number of retention years, plus one. The destruction date would be January 1 of that year. For example, a 2014 document with a retention date of 6 years would be eligible for destruction on January 1, 2021 (2014 + 6 +1 = 2021).
 - If the records are considered archival, noted under "Designation" in the records retention schedule and identified as "Transfer to Washington State Archives for appraisal and selective retention" under "Retention and Disposition Action", put Archival in the scheduled destruction. It would also be helpful to note the date the documents will meet their retention so that the records can be reviewed in a timely manner.
- **DAN (Disposition Authority Number):** Listed in the records retention schedules.

Transferring Archival Records to State Archives:

Records considered archival need to be appraised by Washington State Archives. Once the records have met their retention email the City Clerk's Office letting them know you have records that are in need of appraisal. The City Clerk's Office will coordinate a time with State Archives and the Department for the appraisal. Archives may not take all of the records and instead may authorize destruction. If so, the department will prepare a destruction form noting "Appraised and rejected by WA State Archives on (date) and approved for destruction" in the Scheduled Destruction box and proceed with the normal destruction process.

Public Records Management Program Policy – Attachment D
Updated: June 2017