Reading and Understanding Records Retention Schedules

A Guide for State Employees

Presented by the Indiana Archives and Records Administration (IARA)

What Is A Records Retention Schedule?

All government records are subject to state and federal laws on how long we have to keep them, who can view them, and what happens to them afterward.

Retention schedules list the categories of records each agency creates or receives. Records with the same subject matter and legal requirements are grouped into the same category.

Those categories are called **record series**, and each record series contains simple instructions on how to comply with the appropriate public records laws for that type of record.

So a Retention Schedule is made up of all the Record Series that belong to the particular unit of government listed in the Retention Schedule's title.

The Two Types Of Retention Schedule

- **Agency-Specific Schedules:** The Archives and Records Administration works with each state agency to publish retention schedules for their unique records: those that no other agency creates or receives.
 - Depending on organizational needs, an agency may have only one agency-specific schedule, or it may have a number of separate schedules that each cover a different division.
- The General Retention Schedule: This schedule is created and updated by the Archives and Records Administration with input from many agencies, and covers broad record types produced by <u>all</u> agencies.

Both types of Retention Schedule are arranged in the same manner and contain all the Record Series that apply to the named unit of government.

What's In A Record Series?

In addition to temporary item/line numbers that vary depending on when (or if) a retention schedule was printed out, each record series contains three main sections:

- 1. Record Series Number
- 2. Title/Description
- 3. Retention Instructions

The labels may vary depending on the age of the retention schedule or when it was last updated, but the contents remain the same.

Let's examine those sections more closely: what's contained in each, and how to use that information!

What's In A Record Series - Section 1: Record Series Number

- The Record Series Number (abbreviated as RS # or just RS) is a unique, permanent identification number, assigned when the series is first approved.
- It's used when you store records in boxes, film, scan, transfer, or destroy them, and it's the main way to identify agency records within the catalogs of the State Records Center and Indiana Archives.
- **For Agency-specific series**, the Record Series Number acts as a combination of birthdate and social security number for the series:

To use a fictional example, in 1974, the 132nd series approved would have been RS# 74-132.

• **General Retention Schedule** numbers indicate the broad record type and where the series falls in it: In the <u>General Retention/ACC</u>ounting records category, the <u>3rd</u> series listed is GRACC-3.

What's In A Record Series - Section 2a: Title

The formal Record Series Title is NOT permanent; it can be updated as needed whenever an agency works with IARA to revise its retention schedule.

It may or may not be unique: many agencies might use a title such as "Client Folders" to describe a completely different set of records with completely different legal requirements, depending on who those clients are, and what services the agency provides.

What a Record Series Title should be is

- As <u>brief</u> as possible it needs to fit on those box labels and forms!
- As <u>descriptive</u> as possible within that length you should be able to glance at a box label and have some idea of what's in there without having to research it in the retention schedule!

In our fictional example Record Series, RS# 74-132, the Record Series Title is "Continuing Education." Short, simple, and understandable.

What's In A Record Series - Section 2b: Description

The Description is a brief synopsis of the type of information covered by the record series, usually located below the title. (If the title is very, very self-explanatory, there may be no additional description.)

The Description usually mentions:

- government programs the records are part of
- who sends the records to the agency
- why they're created or treated in a certain way
- the different document or data types that may show up in the file.

More specifically, you're likely to find...

- 1. **A simple narrative explanation.** The length of this may vary, but the goal is to make it as brief and easy to understand as possible. Your schedule may also be used by
 - o new staff (or just new to your program)
 - o employees in other divisions and agencies, trying to weed out the series that don't cover their documents
 - regular citizens who want to know how we're preserving their records

So when writing record series, we try to avoid both wordy legal definitions and internal jargon that's only familiar to employees who work closely with the records or program.

- 2. **Listings of commonly found State or Federal forms** so that people searching for those numbers or titles can find the record series that explains what to do with them.
 - However, just because one form is referenced specifically and another may not be, don't assume the second one isn't covered by the record series. This is true of *anything* you don't find listed: a form, report or document doesn't need to be mentioned explicitly, as long as the overall description covers the subject matter.
- 3. **If relevant, the format or media** in which the records are most commonly created or stored. Confidentiality, retention lengths, and final dispositions are the same regardless of format, but where you store records and how to make sure they last for the full retention period may differ.
 - If the listed instructions (in Section 3) don't address the format you've got, follow these rules of thumb:
 - Unless specifically instructed, the only format you should send to the <u>Records Center</u> is paper. Store electronic records and other formats in your agency until their final disposition point.
 - EVERY format must go to the Indiana Archives if the Record Series lists that as the final disposition.
- 4. Any State or Federal legal citations (or other government publications) that affect
 - o **public access** to the records: so that both citizens and state employees will be aware that some or all parts of the record might be **confidential**, and be able to seek out the relevant laws to learn the details.
 - the retention instructions: so that those curious about why we do certain things with this type of information can read the laws and find out. If there is no retention-related citation, the retention period was assigned based on agency or programmatic needs.

In our fictional example Record Series, RS# 74-132, the description is: "Documentation of a licensee's completion of required professional credit hours for the current renewal period, on SF 999988 or equivalent. May be submitted in paper or electronic format. Access to these records may be affected by IC 38-15-2(a). Retention based on 58 CFR 12.5(f) and 12.8."

What's In A Record Series - Section 3: Retention Period

Also known as Retention and Disposition or Retention Instructions, this section is the nitty gritty of a Record Series, and what most readers of retention schedules want to find: the details on what the agency must do with the covered records.

Again, the instructions are written as briefly and straightforwardly as possible (though specific legal or business phrases are required in certain situations), so that

- all employees will be able to understand what they need to do to fulfill their program and legal requirements toward the records
- no records are accidentally disposed of improperly, or too soon

These instructions may include...

1. Format conversion instructions:

- Whether and when to image (scan) or microfilm original paper records, or convert electronic records to Computer Output Microfilm (also known as COM).
- What to do with both sets of records after the conversion.

An example of language you might find: "MICROFILM paper records according to 60 IAC 2 on receipt. DESTROY hard copies after verification of film for completeness and legibility. DESTROY microfilm four (4) years after renewal date."

2. A description of

- where to store paper records while your agency still owns them (if you're not keeping them within your own offices, which is the default situation)
- o when to transfer them to that storage location.

If you end up keeping records in your office past the date they should have been sent to the Records Center:

- If the final disposition date has not yet passed, send the records on to the Records Center when you're ready. The Records Center staff won't keep them longer because they arrived late; the storage time will be adjusted so that the total retention period remains the same.
- If the records have reached their final disposition date already: skip the Records Center entirely. Either destroy the records or transfer them directly to the Indiana Archives, whichever is indicated in the record series.

3. Information on how long the records need to remain

- in various locations and/or
- o in the agency's ownership before their final disposition.

In our fictional example Record Series, RS# 74-132, the Retention Instructions are "TRANSFER paper records to the RECORDS CENTER after renewal date. DESTROY after an additional four (4) years in the RECORDS CENTER. DELETE electronic records four (4) years after renewal date."

This addresses how long paper records must remain in the Records Center, and how long electronic records must remain in the agency. The total (4 years) is the same, because laws about retention periods don't change just because the record format changes!

- 4. What finally happens to your records after all of their travels and storage are over:
 - destruction
 - by the agency if you're storing your own records
 - by the Records Center if the records are stored there, or if you request courtesy destruction service from their staff

or

o transfer of records – and their ownership – to the Indiana Archives:

Records with potential historical significance will be scheduled for Indiana Archives transfer, where the Archivists may preserve them exactly as received, or may weed, sample, and evaluate the records to retain only those items with permanent value in the collections.

Applying the Retention Schedule

RETENTION PERIODS may contain references to different types of years, especially if it's been a while since the Retention Schedule was revised. Here's how to calculate when to dispose of records that use such language, with an example of each type:

Year: 12 full months. DESTROY one year after trigger event: If the trigger event happens in August, 2017, you can destroy the records in September of 2018.

Calendar Year: January 1 through December 31. DESTROY one calendar year after trigger event: If the trigger event happens in August, 2017, the one calendar year doesn't start until January of 2018. You can destroy the records in February of 2019.

Fiscal Year or State Fiscal Year: July 1 through the following June 30. DESTROY one fiscal year after trigger event: If the trigger event happens in August, 2017, the one state fiscal year doesn't start until July of 2018. You can destroy the records in August of 2019.

Federal Fiscal Year: October 1 through the following September 30. DESTROY one federal fiscal year after trigger event: If the trigger event happens in August, 2017, the one federal fiscal year doesn't start until October of 2017. You can destroy the records in November of 2018.

Current preferred retention schedule language does not count in Calendar, Fiscal, and Federal Fiscal Years. Instead, only "Year" is used, and the other information becomes part of the trigger event for when you start counting the years. For example, instead of "DESTROY two fiscal years after file closure," the instructions would read, "DESTROY two years after the end of the fiscal year of file closure."

Language, Terms, and Phrases

While we try to write as plainly as possible, some of the language used on retention schedules may still be a bit obscure, while other words are familiar enough, but put together in a way that doesn't immediately make sense if you're not used to records management. Here's a brief guide to help clear things up!

TRANSFER:

Most often used to mean: You should move the records from their current location – usually within your agency – to the Records Center, the Indiana Archives, or some other agency or office.

The instructions for how to accomplish that transfer vary, and are listed in various handbooks on the IARA website; the retention schedule won't go into that level of detail.

In some rare cases: You may find a phrase like "If XYZ happens, TRANSFER to Record Series 68-272." In that situation, TRANSFER means that because certain criteria (XYZ) have been met, these records should now be considered to fall under a different record series, and you should follow the retention instructions for that other series.

DESTROY OR DELETE:

Their meaning is probably pretty obvious, but there are two additional things worth knowing about these words:

While one is most commonly associated with physical objects, and the other with data, **they mean exactly the same thing.** If either of those words is present, you have permission to get rid of the information, no matter what format it's in.

If the retention schedule doesn't specifically tell you HOW to destroy/delete the records, then it's up to you. (Though we'd certainly prefer you choose the most environmentally friendly option available!)

If there's a public access/confidentiality note in the description, though, then the information has to be disposed of confidentially – in a way that no one who isn't authorized to access it will have the chance to gain access or re-create it.

IMAGE OR SCAN:

These mean the same thing: use a scanner to create electronic images of original paper documents, saving them either as TIF image files, or in one of several PDF file options. This may be done by your agency, by an outside vendor, or by IARA's Imaging and Microfilm Lab, which is usually the most cost-effective option for any imaging not performed by your own staff.

"According to IARA standards." Minimum imaging standards can be found in <u>Imaging and Public Records: Basic Questions</u> and Answers for Government Officials in the Publications section of the IARA website.

You can also find out more detailed information by contacting IARA's Electronic Records staff to discuss the best options for the particular record type you're working with.

MICROFILM:

Copy original records to microfilm format. (Some record series may refer to microfiche. This is still microfilm. Fiche is just a specific way of printing and cutting the film.) Microfilming may be performed by your agency (though most state agencies don't have the equipment), or by IARA's Imaging and Microfilm Lab.

"According to 60 IAC 2." This is the Indiana Administrative Code that lists the minimum quality standards for government microfilm.

"After verification of microfilm for completeness and legibility." This is the quality control that your agency must perform once you receive your completed microfilm rolls, before you can destroy any paper originals. The standards for this are also in 60 IAC 2, and you confirm that the film has been verified by signing a State Form 42775, Certificate of Compliance/Verification.

CONFIDENTIAL:

Depending on the age of the record series you're working with, you may find this stated in a number of different ways:

- Confidential
- Partially confidential
- Confidential at the discretion of a public agency
- Access to these records may be affected by...
- Disclosure of these records may be affected by...

...followed by a state or federal legal citation.

For an employee reading the retention schedule, these all mean basically the same thing: these records, or some part of these records, contain information that not everyone is allowed to access. The details on who is allowed to access the records, which parts might be open to everyone, any time limit on the confidentiality, and the reasons for it, can be found by reading the full text of the listed legal citation in its source publication. (Indiana Code, US Code, etc.)

AUDIT:

Unless another type of audit is specifically mentioned, this refers to the audits performed by the Indiana State Board of Accounts. You'll find these references in the instructions for when to transfer or destroy certain records, and they'll usually be phrased like this: "...after receipt of STATE BOARD OF ACCOUNTS Audit Report and satisfaction of unsettled charges."

Here's how to verify that you've fulfilled this requirement:

- 1. Visit the SBOA Audit Report Database (https://secure.in.gov/apps/sboa/audit-reports/)
- 2. In the "SEARCH" text box, type "Federal Single."
- 3. In the "UNIT TYPE" drop-down box, choose "State."
- 4. Leave everything else blank.
- 5. Click the SEARCH button.
- 6. In the results, click the arrow next to "End Date" to sort by that column.
- 7. Click the same arrow again to bring the most recent to the top.
- 8. Find the most recent end date whose Audit Type is "Federal Single."
- 9. If your records date is ON OR BEFORE that End Date, you're good to go!

CRITICAL RECORD:

On a very select number of record series, you'll find the phrase "This is a critical record" in the description.

This refers to records that are considered critical to the running or re-building of state government in an emergency situation.

Critical records are determined by IARA (with input from your agency) during a retention schedule's development, and require special consideration when it comes to formats and preservation.

EVALUATION, SAMPLING or WEEDING:

Most record series scheduled for transfer to the Indiana Archives will contain language like "for EVALUATION, SAMPLING and WEEDING pursuant to archival principles."

This just means that the archivists are authorized to review the contents of the records transferred to them, and keep for the permanent collections only those parts that they determine to have lasting value.

Those "archival principles" consist of their own experience and education, best practices in the archival profession, and any processing guides that have already been created for that record type by Indiana Archives staff.

TERMS USED IN THE RETENTION SCHEDULE SEARCH:

While you're not likely to find these in a printed retention schedule, they may come up if you're using IARA's online search to find and read your record series information.

Discontinued series: This is a record series that is no longer authorized for use. Either the agency no longer creates the record type, or the records are now covered under a different record series. Discontinued series will not appear on printed retention schedules, but are available in the online search, so that you can research them for historical purposes, and you can read record series information on permanent Indiana Archives holdings that were transferred there while the Discontinued series was still active.

Status note: If present, this note will let you know when a series was discontinued, why, and which other record series (if any) to use in place of it.

For More Information

If you have questions about reading and using records retention schedules that aren't covered here, please let us know! IARA's Records Management division will be happy to either answer them, or get you in touch with the best person or division to provide that information. You can reach us by e-mail at RMD@iara.in.gov.

You can also find more detailed information on our Publications page. (Under Services For Government/IARA Publications.) Especially useful are the Records Manager and Records Center handbooks, the Imaging publication mentioned earlier, and the Guide to Proper Records Destruction.

Thank you

for taking our course on Reading and Understanding Records Retention Schedules.

For more in-depth information (including additional training options), please visit our website at iara.IN.gov.

For questions or comments on this course, please contact Amy Robinson Indiana Archives and Records Administration 317-232-3285 | arobinson@iara.in.gov