

ML&P Records Management Program and Procedures Systems & Communication Division

Updated 11/6/2015

I. Purpose

The purpose is to outline a standard set of procedures for implementing a Records Retention Program for ML&P. The procedures outlined herein are provided as a supplemental tool to existing regulations and procedures as a means to assist ML&P staff to comply with all known regulations with more accuracy and consistency.

II. Scope

These procedures apply to all ML&P staff that create and manage records for the purpose of conducting business on behalf of ML&P.

Records are defined by MOA Policy & Procedure 52-1 as:

Any method of storing information, including but not limited to spoken words, handwriting, typewriting, printing, photostating, photographing, and any other form of communication or reproduction upon any medium, including but not limited to paper, magnetic, or paper tape, photographic film or prints, magnetic or punched cards, discs, drums, and phonographic records, developed or received under law or in connection with the transaction of agency business and preserved or appropriate for preservation as evidence of the organization, function, policies, decisions, procedures, operations, or activities of the Municipality or because of their informational value.

III. Statement of Authority

The Records Retention Program and Procedures outlined herein are created and implemented in accordance with Anchorage Municipal Code 3.95 and MOA P&P Chapter 52.

ML&P has appointed the position of Document Control Administrator, within the Systems & Communication Division, with the duties of records management and direct coordination with the Municipality of Anchorage (MOA) Records Management Officer, as required by MOA Policy & Procedure 52-1.

IV. Statement of Benefits

The implementation of a thorough and consistent records retention program results in the following benefits:

1. Fulfills legal mandates,
2. Reduces liability of mismanaged records,
3. Reduces cost/time for retrieval of stored records,
4. Reduces cost/time for re-creation of lost/misfiled records,
5. Reduces the cost of (and space for) storing obsolete/non-valuable records, and
6. Identifies vital records and strategies for preservation.

Date: 11/30/17 Exh # 4-43
Regulatory Commission of Alaska
V-16-094 By: (S) V-17-008
Northern Lights Realtime & Reporting, Inc.
(907) 337-2221

V. Statement of Responsibility

All staff members who create and/or maintain records in the course of conducting business for ML&P are responsible for the following, which includes but is not limited to:

1. Manage their records appropriately and consistently,
2. Know all local, state, and federal agencies that govern their activities,
3. Know all record management regulations stipulated by those agencies,
4. Work with the Document Control Administrator to identify and document their records management obligations, and
5. Ensure compliance with those obligations.

The Document Control Administrator is responsible for the following, which includes but is not limited to:

1. Help identify legal resources and obligations,
2. Provide information regarding accepted records management practices,
3. Coordinate storage and retrieval services for semi-active, inactive, and permanent records,
4. Coordinate final dispositions for records,
5. Identify best practices for handling vital records,
6. Administer/update the ML&P Records Retention Schedule (RRS), and
7. Promote the consistent implementation of the RRS, by means of regular training and audits.

VI. Statement of Exceptions

If, at any time, it becomes known that a record, or group of records, will or may be a part of litigation/legal discovery, the record **cannot** be discarded or destroyed (even if it is scheduled for such action on the RRS).

Because some records are quite variable in their nature and uniqueness, it may be determined upon the approval of a Division Manager and the Document Control Administrator that a unique record is treated differently than others in the same record series, provided that the reasoning behind such action is clearly documented.

VII. Records Retention Schedule Description

The Records Retention Schedule (RRS) is a list of record series that are of legal/administrative/operational importance to ML&P. The RRS indicates how long those record series are to be kept (the retention period). The following provides a further explanation of the RRS:

1. Column 1, Schedule #: The Schedule # is used as a point of reference to match the record listings on the RRS with the database of archived records, to track the proper disposition of each record. The numbers do not represent an agency-wide record/file indexing system.
2. Column 2, Record Series Title: The Record Series Title represents broad groups of records. For example, the "Payroll-General" record series includes, but is not limited to, timesheets, pay-stubs, leave forms, personnel action forms, etc. Each

division is provided with a separate listing of all known record titles that belong to each record series. If a record is not found on the RRS and it is unclear what record series it may belong to, ask a section supervisor or division manager for guidance first. If it cannot be determined at the division level, contact the Document Control Administrator for assistance.

3. **Column 3, Div/Section:** The Div/Section (Department) identifies the **Official Record Holder**. Oftentimes, more than one division/section/person participates in creation and/or management of records belonging to one “project.” In this case, when the records need to be stored/archived, the assigned Division/Section is responsible to combine files into a meaningful grouping, and all duplicate records held by others are to be discarded. For records that are commonly created in all divisions, such as contracts, reports and requisitions, *the Official Record Holder is the Originator* of that record. These types of records are represented on the RRS as “All Divisions.”
4. **Columns 4 and 5, Retention Period:** The “In-Office Retention” and “Total Retention” columns indicate how long a record must be held. If the Total Retention is the same as In-Office Retention, then there is no need to send the record to offsite storage prior to destruction.
 - a. Retention periods are often shown as “C + a number of years.” This means to hold and preserve the record as long as it is **current**, *and then* for a specified number of years. Some records have a definite date that marks when the record is no longer current. For example, many accounting records are current through the end of the month or end of the year. The current status of other records may not be as clearly defined: For example, the Record Series titled “Guides and Studies” has a retention period of C+5. A guide or study may be considered current for the life of a related piece of equipment, or until the completion of a project, or until the record is superseded by a newer version, etc. When there is not a definite date that determines a record’s current status, the official record holder is responsible for that determination. If this cannot be determined at the division level, contact the Document Control Administrator for assistance.
 - b. Another type of retention period is “A + a number of years.” This means to hold and preserve the record until it has been audited, and then for the additional specified number of years. Both internal and external auditors review our records, which is typically done by March of the following calendar year. However, if your division is responsible for records that are audited, it is your responsibility to confirm that audits are complete before any destruction occurs or the retention time commences.
5. **Column 6, Comments:** The Comments column may provide additional direction regarding the record description or retention period.

VIII. Amending the Records Retention Schedule

The Document Control Administrator will work with division managers, or appointed agents, to amend the RRS if:

1. A division or audit identifies that we have a record of legal/administrative/operational importance that is not represented by any record series listed on the current RRS,
2. A retention period does not fulfill a regulated requirement, or
3. A retention period does not cover the record's period of usefulness.

The procedures for amending the RRS are outlined as follows:

1. An inventory worksheet is completed on each record in question.
2. All known applicable regulations are identified.
3. An appropriate retention period is identified.
4. A final disposition is identified.
5. The Document Control Administrator drafts a revised RRS and routes for official approval by the ML&P General Manager, MOA Records Management Officer, Clerk, Controller, Internal Auditor, and the Municipal Assembly.
6. Until that process is complete, a record that is not represented on the RRS cannot be discarded/destroyed without special Assembly approval.

IX. Implementing the Records Retention Schedule

To implement the RRS means to actually retain and dispose of records in accordance with the timelines indicated on the RRS. Failure to properly and consistently implement the RRS unfavorably affects the legal liability of both ML&P and the individuals responsible for the records. Therefore, the procedures for implementing the RRS are required and are outlined as follows:

1. The Official Record Holder is responsible for ensuring that the record is: (a) retained in the office for the record's full In-Office Retention period; (b) sent to offsite storage for archival once the In-Office Retention period has passed; and (3) reviewed for final disposition once the Total Retention period has passed (either destruction, or a determination that an extended or permanent¹ retention period is necessary).
2. Any *copy* of a record may be discarded or destroyed when it is no longer useful. However, it is also the responsibility of all "copy-holders" to ensure disposal of their copies within the retention period shown on the RRS.
3. Transfer of records to offsite storage (for the archival portion of the retention period), should occur as soon as the period of time indicated in the "In-Office Retention" period on the RRS has passed: The Official Record Holder should regularly review their records to determine if any records have met or exceeded their In-Office Retention period.

¹ If special circumstances warrant the continued retention of a record beyond its destruction date, senior level approvals are required and must be documented.

Procedures for offsite storage are outlined in Section X, below.

4. Disposal of records **cannot** occur until a Records Destruction Authorization form is completed, with all necessary approval signatures. If you have records *in your office* that are due for destruction, contact the Document Control Administrator to request the form and to coordinate the approvals and disposal of records. Detailed procedures for disposal of records are outlined in Section XI.

X. Offsite Storage

The following is an outline of the steps and requirements for storing records offsite:

1. Boxes used for storing records **must** be consistent in size and quality. Therefore, **always** contact the Document Control Administrator to request boxes when preparing to store records offsite.
2. If you need to store odd-sized materials, inform the Document Control Administrator well in advance. Odd-sized is defined as any materials that do not fit in a standard letter size Banker's Box.
3. **All records being sent to offsite storage must be indexed and boxed by the Official Record Holder.** Proper indexing of records will ensure that future requests for retrieval of those records from storage can be processed quickly and accurately. This means that specific, identifying information must be listed for each record:
 - a. Effective dates ("From" and "To" dates),
 - b. Record series title,
 - c. Schedule #,
 - d. Division/Section title, and
 - e. Any other important key words that describe, identify, or distinguish the record.
4. Infolinx is the records management software you will use to log and index the above information.² You should index your files in Infolinx *as you are packing the records into the box(es)*. An Infolinx User Manual is available on the ML&P Intranet.
5. Packing The Box:
 - a. **Each box of stored records must have only one date of destruction.** In other words, it is allowable to box records of different record series, but **not** records with different retention periods and/or ending dates. For example, records represented on Schedule # 022-000 of the RRS, "Bonds-Official Statements" can be stored in the same box as records represented on Schedule # 032-000, "Payroll-Procedural Books" because they both have a permanent retention period. In contrast, records from Schedule #

² If you do not already have Infolinx on your computer, send an email to MLPRecords@ci.anchorage.ak.us.

022-000, "Bonds-Official Statements" cannot be stored with records represented on Schedule # 021-000, "Bonds-Working Papers" because they have different retention periods. If these records were to be mixed, then later the records would need to be separated for different destruction times, and this significantly reduces the efficiency of the program.

- b. Before placing records in boxes, remove all unnecessary items, such as transitory or multiple copies, reference materials (especially resources and records from outside agencies that could be retrieved from them later if needed), all hanging folders, paper clips, binder clips, and covers, etc. Hanging folders are especially prohibited as it reduces the useful capacity of the box and also destroys the box and its lid over time.
 - c. Do not over-pack boxes. Over-packed boxes will not be accepted for storage. Leave at least 1 inch of space in the box to allow for access to the handle holes and for future record searches (it is very difficult to look at records in the box if it is packed so tight that the records cannot be moved from side to side). Also, over-packed boxes do not allow the lid to stay on and destroy the box's integrity over time.
 - d. Records with permanent retention periods require special care. Please notify the Document Control Administrator in advance if you will be submitting records for permanent storage.
- 7. Once the records are indexed in Infolinx and you have sent your request via Infolinx for the boxes to be sent offsite, then you may send an email to MLPRecords@ci.anchorage.ak.us indicating that you are ready to transfer records to offsite storage.
 - 8. The Document Control Administrator will review all boxed records and corresponding indexes for completeness and accuracy before acceptance for offsite storage. Upon this review, if duplication of records or incomplete/inaccurate indexing is identified, the boxes will not be accepted until corrections are made.
 - 9. Once a box is accepted, a unique, identifying barcode label will be created and affixed to the box. Then the box will be transferred to offsite storage by the Document Control Administrator.
 - 10. Retrieval of records from offsite storage can occur by requesting delivery of a box or boxes via Infolinx, or by sending an email request to MLPRecords@ci.anchorage.ak.us.

XI. Disposal of Records

The following is an outline of the steps and requirements for the disposal of records:

1. The location of the records (in-office or offsite) determines who initiates the disposal process.
2. For in-office disposal of records:
 - a. Contact the Document Control Administrator to request a Records Destruction Authorization form.
 - b. Records must be fully indexed on the Records Destruction Authorization form, including the Department/Division/Section, Record Series Title, Schedule # (from the RRS), effective dates of the records, and the Total Retention period for the records. Fill out the form, obtain the division manager's signature, and forward to the Document Control Administrator to obtain the remaining required approvals.
 - c. When the Destruction Authorization is returned to the originating division with all approvals, then destruction can occur. A witness must sign the last line of the form to verify that destruction occurred.
 - d. Return the completed Destruction Authorization form to the Document Control Administrator for permanent retention.
3. For records requiring disposal that are in offsite storage:
 - a. The Destruction Authorization will be initiated and completed by the Document Control Administrator and routed for approvals.
 - b. Failure to approve Destruction Authorizations will be documented as not in compliance with the RRS. If special circumstances warrant the continued retention of a record beyond its destroy date, senior level approvals will be required and documented.
 - c. Once the Destruction Authorization approvals are completed, the Document Control Administrator will ensure that destruction occurs, verify such, and permanently retain the Destruction Authorization form.
4. All records of a confidential nature will require shredding, or some other acceptable means of rendering the record unreadable. Examples of confidential records include customer accounts and personnel records.
5. If it is unclear whether a record is confidential, it is always best to shred. If in-office records of large volume require shredding, coordinate these services through the Document Control Administrator.
6. All records that are clearly not confidential may be recycled or discarded in a wastebasket, to avoid the unnecessary costs of shredding.

