

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

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 52-1 as "Any method of storing information, including but not limited to spoken words, handwriting, typewriting, printing, photo stating, 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 Specialist, 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 sound 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.

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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 Specialist to identify and document their records management obligations and
5. Ensure compliance with those obligations.

The Document Control Specialist 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 Record 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 Specialist 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. Record Retention Schedule Description

The Record 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. In Column 1 of the RRS, 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. **Record Series Title**, Column 2 of the RRS, represents broad groups of records. For example, "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 Specialist for assistance.

3. Column 3 of the RRS, titled **Div/Section**, identifies the division/section that is 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 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. In Column 4 of the RRS, **Retention Policy** indicates how long a record must be held. If the Total Retention number of years is the same as In-Office Retention, then there is no need to send it 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 year. Other records may not have clearly defined dates for current status. 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 Specialist for assistance.
 - b. Another type of retention period is "A + a number of years". This means to hold 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.

VIII. Amending the Record Retention Schedule

The Document Control Specialist 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 Specialist 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 Record Retention Schedule

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

1. **The official record holder is responsible for ensuring that the record is retained for its full retention period and disposed of accordingly, when applicable.**
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 off-site storage, for the Records Center portion of the retention period, should occur on a regularly scheduled basis. Procedures for off-site storage are outlined in Section X.
4. Disposal of records **cannot** occur until a Destruction Authorization form (found in MOA P&P 52-3, Section 3) is completed, with all necessary approval signatures. If you have scheduled records in your office that are due for destruction, contact the Document Control Specialist 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. Off-site Storage

The following is an outline of the steps and requirements for storing records off-site:

1. Boxes used for storing records **must** be consistent in size and quality. Therefore, **always** contact the Document Control Specialist to request boxes when preparing to store records off-site.
2. If you need to store odd-sized materials, inform the Document Control Specialist 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 off-site 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 pieces of information about each record must be electronically listed and given to the Document Control Specialist such as:
 - a. Effective dates,
 - b. Record series,
 - c. Record title,
 - d. Division/Section title, and
 - e. Any other important key words that describe the record.
4. A records management software program, which is designed to track the details and locations of the records, is used to facilitate the indexing process. This program must be used *as you are packing the records into the boxes*. Please contact the Document Control Specialist (DCS) before you begin packing boxes to receive the most current version of the program. **The DCS will provide separate procedures on the use of the software program.**
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 Line 22 of the RRS, "Bonds-Official Statements" **can** be stored in the same box as records represented on Line 32, "Payroll-Procedural Books" because they both have a permanent retention period. In contrast, records from Line 22, "Bonds-Official Statements" **cannot** be stored with records represented on Line 21, "Bonds-Working Papers" because they have different retention periods. If these records were to be mixed, then later on the records would still have to be separated *again* for different destruction times, and this significantly reduces efficiency of the program. Any records that have exceeded the official retention period will not be accepted for storage.

- 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, oversized binding clips and covers, etc. Hanging folders are especially prohibited as they reduce the useful capacity of the box and also destroy 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 contact the Document Control Specialist, well in advance, if you wish to submit records for permanent storage.
- 6. For records that are held permanently in-office, such as engineering drawings, special attention can be given in-office to help preserve them. Contact the Document Control Specialist for more information about record preservation.
 - 7. Once the records are indexed and packed into a box, then notify the Document Control Specialist that you are ready to transfer records to off-site storage by sending the electronic file of the completed records index to the DCS.
 - 8. The Document Control Specialist reviews all boxed records and corresponding indexes for completeness and accuracy before acceptance for off-site 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. When a box is accepted, a label will be created which contains a bar code and the division/section of origin. The label will be attached to the box and then transferred to offsite storage by the Document Control Specialist or assigned agent.
 - 10. Retrieval of records in storage can occur by submitting a request to the Document Control Specialist. Each division can be provided with search & request abilities on the software program, so that the record "requester" can identify which box and record they need in order to complete the request process. Separate training and written procedures can be provided for these procedures.

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 off-site) determines who initiates the disposal process.
2. For in-office disposal of records:
 - a. Call the Document Control Specialist to request Destruction Authorization forms.
 - b. Records must be fully indexed on the Destruction Authorization, including the record titles, the corresponding record series, and effective dates of the records. Fill out the form, obtain the division manager's signature, and forward to the Document Control Specialist 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 Specialist for permanent retention.
3. For records requiring disposal that are in off-site storage:
 - a. The Destruction Authorization will be initiated and completed by the Document Control Specialist 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 Specialist 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 Specialist.
6. All records that are clearly **not** confidential may be recycled or discarded in a wastebasket, to avoid the unnecessary costs of shredding.

