BALTIMORE COUNTY PUBLIC SCHOOLS
RECORDS MANAGEMENT PROGRAM
PROCEDURES GUIDE
June 2019

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CHAPTER 1: INTRODUCTION AND SCOPE

Superintendent's Rule 2380 requires that the school system have standard procedures concerning the retention and disposal of records. Baltimore County Public Schools has approved records retention schedules that enable offices to decide when to dispose of their records. These records retention schedules are designed to ensure that school system records are retained for as long as they are needed for administrative, legal, fiscal, or audit purposes, and -- once their value to the office and the school system has passed – that they are disposed of properly.

Records management is important in protecting confidential records, preserving records that have enduring and permanent value, and increasing efficiency while decreasing workplace clutter. These procedures describe the mandated process that each BCPS school, office, department, and division must use to maintain, archive, and dispose of records.

All employees have a responsibility to create and keep records that record the school system's business activities. BCPS records may only be disposed of in accordance with Rule 2380, approved records retention schedules, and these procedures.

In addition to these procedures, information on record retention and management may be found:
- Our Web site: https://intranet.bcps.org/records_retention_program/
- FAQs: https://intranet.bcps.org/records_retention_program/misc/FAQs.pdf
- Your office's designated Records Liaison
- Contact us at: recordsretention@bcps.org

CHAPTER 2: DEFINITIONS

A.   *Certificate of Records Destruction* – A formal, written notice that identifies records that have been destroyed.

B.   *Destruction* – The disposal of records through shredding, deletion or other methods after the record has passed its retention period.

C.   *Litigation Hold* – A process used by BCPS to preserve all records relevant to potential or actual litigation.

D.   *Non Records* - Records that are not considered BCPS records include, but are not limited to, extra copies of original documents, documents kept only for convenience or reference, drafts of documents, and blank forms. (The records retention schedule does not apply to "non records." You should avoid filing non-records with official BCPS records.)

E.   *Non-Permanent Records* - Non-permanent records have temporary value and may be disposed of in accordance with the records retention schedule after the passage of the retention period.

F.   *Permanent Records* - Permanent records are those that have an ongoing administrative, fiscal, legal, historical or other archival value. These records will be transferred to the Maryland State Archives for safekeeping.

G.   *Record* - Any documentary material created or received by a Baltimore County public school or office, or a school system official in connection with the transaction of BCPS business. A record includes:
1.   Written materials, e-mail, books, photographs, photocopies, publications, forms, microfilms, tapes, computerized records, maps, drawings, and other materials in any format; and
2.   Data generated, stored, received, or communicated by electronic means for use by, or storage in, an information system or for transmission from one information system to another.

H.   *Records Liaison* - Each office must designate a *Records Liaison*. The Records Liaison is responsible for coordinating his/her office's records in accordance with the records retention schedule and serve as the liaison with the Records Officer, the Office of Logistics, and the Office of Information Technology.

I.   *Records Officer* - The person designated by the Superintendent whose responsibilities include, but are not limited to, coordinating the BCPS records retention program, monitoring records management activities, and serving as the liaison with the Maryland State Archives and the Maryland State Department of Education. **No record may be destroyed without the prior written approval of the Records Officer.**

J.   *Records Retention Schedule (RRS)* – The official document that identifies all BCPS records and specifies which records are to be maintained permanently and which are deemed temporary and can be destroyed after a certain period of time.

K.   *Retention Period* – The duration of time a record is to be retained before the record is destroyed.

L.   *Transitory Records* - Records of temporary usefulness that:
(1)   Are not regularly filed within the school system's recordkeeping systems, and
(2)   Are required only for a limited period of time for the completion of an action by a BCPS employee or in the preparation of an on-going records series.

Transitory records are not essential to the fulfillment of statutory obligations or to the documentation of school system functions. Please see Schedule C1446, All Offices and Schools, Series No. A.01 for more information.

CHAPTER 3: ROLE OF THE RECORDS LIAISON AND ALTERNATE

The office records liaison and his/her alternate have the following responsibilities:

1.   Act as the office's liaison with the BCPS Records Management Program;
2.   Assist in developing and maintaining an accurate record survey;
3.   Review and suggest changes and/or deletions on the office's RRS;
4.   Provide documentation of federal/state rules/regulations governing the retention period of specific records within the office;
5.   Maintain the office's records retention schedule;
6.   Approve/Send eligible records to archives (offices only);
7.   Complete appropriate forms accurately and according to established Records Retention Program procedures;
8.   Manage disposition of office records according to the approved RRS;
9.   Maintain Disposition Logs;
10.   Identify vital records;
11.   Notify the Records Officer any changes in the office's records liaison/alternate assignments (e.g., name changes, new phone, new location, etc.);
12.   Notify the Records Officer of organizational changes (e.g., department/office name changes, department/office head changes, new divisions created, mergers, etc.);
13.   Complete and approve the Certificate of Records Destruction to authorize the disposal of records in storage that have met their retention period;
14.   Attend and/or request records training when needed;
15.   Educate others in the office on the BCPS Records Management Program; and
16.   Follow all published Records Management Program procedures.

CHAPTER 4: WHAT IS A RECORD?

The Code of Maryland Regulations defines a "record" as any:

1.   Written materials, e-mail, books, photographs, photocopies, publications, forms, microfilms, tapes, computerized records, maps, drawings, and other materials in any format; and

2.   Data generated, stored, received, or communicated by electronic means for use by, or storage in, an information system or for transmission from one information system to another.

Records consist of information recorded in any medium or form including hard copy correspondence, spreadsheets, e-mail, databases, content appearing on Web sites, plans, publications, photographs, registers/logs, diaries, film and maps.

Examples of records include, but are not limited to, requests and authorizations to purchase office equipment, annual leave forms, minutes and agendas of committees, applications, financial records, etc.

Special Media Records: Special media records are maintained separately from other records because their physical form or characteristics require unusual care. Examples of special media records include:

1.   Architectural and Engineering records – drawings and related records depicting the proposed and actual construction of roads and buildings.

2.   Micrographic records – records containing images greatly reduced in size and generally stored on microfilm.

3.   Three-dimensional objects.

Official Records: An official record may be any of the following if it:

1.   Documents official school system decisions and commitments;

2.   Adds to a proper understanding of the formulation or execution of school system actions, operations and responsibilities;

3.   Conveys information of value on important school system activities;

4.   Facilitates action by school system staff;

5.   Provides key substantive comments on a draft;

6.   Is required by the school system to be created or received; or

7.   Protects the financial, legal or other rights of the school system and persons directly affected by the action.

CHAPTER 5: WHAT IS *NOT* A RECORD?

Non-records are excluded from the legal definition of records, either because the materials do not meet the general conditions of record status already described, or they fall under three specific categories, as follows:
1.	Extra copies of documents preserved only for convenience or reference. Some copies of official records may have a retention period in your schedule.
2.	Stocks of publications. (However, BCPS must maintain a record copy of publications produced internally, including annual and special reports, special studies, brochures, pamphlets, books, handbooks, manuals, posters, maps, etc.)
3.	Library and exhibition material created or acquired and preserved solely for reference or exhibition purposes.
4.	Personal papers. These are notes or drafts used to prepare or analyze other documents, and are materials that relate solely to an individual's personal and private affairs, or are used exclusively for the individual's convenience and are not used to conduct BCPS business.

How to Manage Non-Records: When it is difficult to decide whether documents are records or non-records, employees should treat them as records. Non-records should not be inter-filed with records. Non-records must be destroyed when they are no longer needed for reference; extra copies may not be maintained after the record copy is destroyed.

CHAPTER 6: ELECTRONIC RECORDS AND DISPOSAL

An electronic record is in a form that requires a computer to process and read it and includes documents created, used and maintained in electronic form. Examples include, but are not limited to:
1.   Documents created using desktop applications (e.g., word processing, spreadsheet).
2.   E-Mail – messages transmitted over any electronic mail communications system.
3.   Databases – electronic information systems that automate business functions and contain a collection of data that can be manipulated. The information is dynamic and often used to support more than one group of records (e.g., BCPS One, Schoology, SIS).
4.   Web sites – the software used to maintain the sites, the content of the sites, records concerning management of the site, and back-end systems that are not covered by other schedules.
5.   Social Media – the various activities integrating web technology, social interaction and content creation. These Internet based applications allow for the creation and exchange of user generated content. Through social media, individuals or collaborators create, organize, edit, comment and/or share content on-line.
6.   Digital images – images taken with a digital camera or scanned from an original document.

Maintaining Electronic Records
Electronic records shall be retained as if they were paper documents. The records shall be maintained in accordance with the approved records retention schedules. Please see Chapter 7 for maintenance of electronic mail.

Disposing of Electronic Records
Records Liaisons shall follow the procedures in Chapter XI, *Disposing of Records*. A Certificate of Records Destruction (CORD) is required before electronic records may be deleted or electronically wiped.

The Records Liaison must complete the CORD form and forward it to the Records Officer for approval and signature. Upon receiving the Records Officer's approval and signature, you may electronically delete the records and complete the CORD log by including date of destruction, method of destruction, and signing where indicated.

Records maintained in an electronic database, such as the Student Information System and Schoology are also subject to these procedures. In order to destroy those records, you must obtain approval from the Records Officer using the CORD form. This CORD form may then be forwarded to the Department of Information Technology to destroy the electronic records.

Also see Chapter 7, Electronic Mail.

CHAPTER 7: ELECTRONIC MAIL

E-mail is just as much a record as any traditional paper record and must be treated in the same manner. It is the **content** of each message—not the form in which it has been created--that classifies it as a record. E-mail can be classified as transitory, a student record, or a business record. **On a rolling basis, after 90 days e-mail will be automatically deleted from e-mail servers system wide.**

Maintaining and Disposing of E-mail Records

Transitory E-mails:
Records relating to agency activities that have temporary value and do not need to be retained once their intended purpose has been fulfilled. (Michigan Department of History, Arts and Libraries, Records Management Services Electronic Mail Retention Guidelines). Many times e-mail sent during the course of the day may be identified as transitory. Transitory e-mails shall be automatically deleted from e-mail servers every 90 days. You do not have to delete these manually to dispose of them.

Student Record E-mails:
Records that are directly related to a student and maintained by an educational agency or institution or by a party acting for the agency or institution. COMAR 13A.08.02.03. All e-mail that references a student should be maintained as a student record, unless it is transitory. It should be printed out or copied into the student record and retained in accordance with the Student Records Retention Schedule. Otherwise, it will be deleted from the system after 90 days.

Business Record E-mails:
E-mails that are prepared, owned, used, in the possession of, or retained by an agency in the performance of an official function. Similar to student record e-mails, pertinent business record e-mails should be printed out or copied into the correct business file in accordance with the content of the business record e-mail. Business record e-mails shall be maintained and destroyed in accordance with your school/department/office's practices and in accordance with the applicable Records Retention Schedule.

CHAPTER 8: RECORDS RETENTION SCHEDULES

Baltimore County Public Schools has approved records retention schedules that enable offices to decide when to dispose of their records. These records retention schedules are designed to ensure the school system records are retained for as long as they are needed for administrative, legal, fiscal, or audit purposes, and that they are properly disposed of once their value to the office and the school system has passed. Adherence to the schedule is important for the efficient and proper functioning of BCPS.

- The records retention schedule for general records held by *all offices and schools* throughout BCPS is found at:
  https://intranet.bcps.org/records_retention_program/schedules/All-Offices-Schools-RRS_2019_Approved-MSA.pdf

- The records retention schedules for BCPS offices may be accessed at:
  https://intranet.bcps.org/records_retention_program/records_retention_schedules.html#1

CHAPTER 9: EXCEPTIONS TO THE RECORDS RETENTION SCHEDULE

The Records Retention Schedule (RRS) establishes minimum retention periods for all BCPS records. The retention periods are based upon federal and state mandates, business needs, and general knowledge as to how long records should be kept. The RRS shall be followed in all cases, unless:

1. The record is subject to a litigation hold;
2. The record has been subpoenaed;
3. The record is the subject of a request made pursuant to the Maryland Public Information Act;
4. The record is subject to an internal or external audit; or
5. The record is otherwise specifically determined by an employee with authority over the record to be necessary for retention beyond the required retention period, or as directed by the Board of Education of Baltimore County (Board).

CHAPTER 10: ARCHIVING RECORDS (CENTRAL OFFICES ONLY)

The Office of Logistics provides warehouse space for the storage of central office records. Long-term records may be transferred to Logistics for safekeeping and storage. These records may be accessed by contacting Logistics in advance. No records shall be accepted by Logistics until a completed T-Req is submitted and approved prior to transfer, and a proper archive box is used and labeled.

The Office of Logistics has established standard operating procedures for the transfer of records to the Office of Logistics for transferring records to and retrieving records from archives. These procedures are available at:
https://intranet.bcps.org/records_retention_program/misc/central_office_SOP/Archives-Central_Office-Standard_Operating_Procedures_Facilities_Management.pdf

A. <u>**Supplies**</u>

*Storage Boxes***:**
1. The Office of Logistics (Logistics) requires that all records be packed in standard-sized storage boxes. Logistics will supply the boxes used to transfer records.
2. Contact Logistics (<u>logistics@bcps.org</u>) to request archive boxes.
3. A maximum of 25 boxes may be requested. No other type of box may be used to archive records.

Box Labels:
1. The Office of Logistics (Logistics) requires that all archive boxes be labeled using standard BCPS labels (2 labels shall be placed on each archive box).
2. Offices may request labels by ordering BEBCO # 39527120255 from Logistics.
3. Use a permanent, black marker to write on the label.
4. The archive label must be completed in its entirety:
    a. **Date Archived** – This is the date the box is prepared for archiving.
    b. **Office Name** – This is the office name noted on the Records Transfer form.
    c. **Fiscal Year (FY)** – Inclusive dates of records in box by fiscal year.
    d. **Series No.** – This should match the respective <u>Series Number</u> assigned to your specific office.
    e. **Box ID** – This should match the Temporary Box Number on the Records Transfer form.
    f. **Contents** – General description of records in box.
    g. **Destroy Date** – Write "permanent" or the date the records are scheduled for destruction in accordance with the Records Retention Schedule.
    h. **Skid #** - For Logistics staff only; **do not write in this space.**
5. Place one (1) label on one of the short ends of the box, and one (1) label on one of the long ends of the box. *Do not* place a label on the top of the box.

B. **Packing Boxes**

1. Binders and hanging folders take up a lot of space and add weight to the box and should be removed.
   a. Remove information from binders, place in files folders or accordion folders.
   b. Do not pack hanging folders when sending documents for storage – remove contents and place in file folder or accordion folder. (Rubber bands, paper clips, and binder clips are acceptable.)
2. Pack similar content together, i.e., with the same classification and with similar retention periods together. For batches of records in a series, the records should be packed in chronological order by date.
3. Records should be placed in the box vertically and in the same direction.
4. Boxes should not be over packed. A box is packed properly when there is about an inch of space at the back, the lid fits securely, and none of the sides bulge.
5. Records that are oversized, such as architectural drawings, should be packed in tubes or boxes that are large enough to hold them. Contact Logistics for questions regarding approved packing materials for oversized items.

C. **Office of Logistics – Standard Operating Procedures**

1. **Records Transfer Form** – Use one Records Transfer Form per box. Place a copy of the form in the front of the box, and attach a copy of the form to the T-Req for transfer to Logistics for archiving. Maintain a copy of the form for your records.
   a. **Temporary Box Number** – Assign a box number to identify boxes, use a consistent, sequential numbering system such as dept. acronym-fiscal year-001, -002, etc. (e.g., LAW-2018-001) Do not re-use numbers.
   b. **Permanent Box Number** – Leave blank. This is usually a bar code number provided by Logistics.
   c. **Contact** – This section should be completed by the person doing the listing or who would be the contact person if there are questions about the boxes or contents.
   d. **Approvals** – Requires the signature of the Records Liaison and the Office Head.
   e. **Confidential Information** – Check the appropriate box – yes or no – indicating whether the box contains confidential or personally identifiable information that is not subject to disclosure.
   f. **Records List/Description** – A description of each file or group of records is required for each item placed in the archive box.
      i. **File No.** – Chronological list of files contained in each box.
      ii. **File Title/Records Class/Brief Description** – List folders or file titles here.
         (1) If batching, include the name of the project; for large batches of records, a general description is sufficient.

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(2)   For capital projects and real estate – include the address or building information in the File Title – this will be the key search terms.

iii.   **Schedule No.** - Your office's schedule number noted on your approved Records Retention Schedule.

iv.   **Series No.** – This should match the respective Series No. located on a Records Retention Schedule.

v.   **Inclusive Dates** – Enter first year and latest year. If not known, enter "unknown"

vi.   **Destroy Date** – This corresponds to how long records must be retained according to the Records Retention Schedule.

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2.   **Transferring Records to Logistics**

     a.   Complete a <u>Transfer Requisition (T-Req)</u> completely.

     b.   The T-Req form requires the signature of the Office Head.

     c.   Scan the T-Req form, with a copy of the Records Transfer form, to logistics@bcps.org.

3.   **Retrieving Files from Archives**

     a.   The Records Liaison of the office of origin may request a box be retrieved from archives by submitting a T-Req form.

     b.   The T-Req form, "ITEM" line, must include the identifying Box ID #, FY as noted on box, and Series #.

     c.   The T-Req form requires the signature of the Office Head.

     d.   Logistics will deliver the box to the requesting Records Liaison.

4.   **Returning Files to Archives**

     a.   To return a box to archives, follow the same procedures in C(2)(a-d).

     b.   Logistics will pick up the box from the requesting Records Liaison and return the box for archiving.

CHAPTER 11: DISPOSING OF RECORDS

The first step in determining which records are eligible for destruction is to organize your records effectively to ensure you can easily and efficiently retrieve records, both hard copy and electronic. It is recommended that you develop a filing plan for storing and organizing records in your Office/Department.

These procedures apply to non-permanent records only. All permanent records must be kept for the specified period of time in the RRS, then transferred to State Archives.

Once records that are eligible to be destroyed are identified, the Records Liaison must request approval to dispose of the records. Prior approval from both the Office/Department Head and the Records Officer are **required** *BEFORE* destroying any records. In order to obtain approval, please follow the procedures below. **All physical records approved for destruction may only be destroyed by Logistics.**

I.   ***Procedures for Records to be Immediately Destroyed:***
- A.   The Records Liaison fills out the entire Certificate of Records Destruction/Disposal (CORD) underline form *except* for the last two columns regarding the *Date of Disposal* and *Method of Disposal*.
- B.   When filling out the CORD form, please refer to your applicable retention schedule to find the Record Series Title, Schedule No., and Series No.
- C.   The Records Liaison signs the form and requests signature from his/her Office or Department Head.
- D.   After obtaining both signatures, Records Liaison e-mails the form to the Records Officer at recordsretention@bcps.org for approval and signature.
- E.   Records Officer shall review the form and approve if the records are eligible for destruction. If not, Records Officer shall contact Records Liaison to remove the records from the form. The Records Officer shall approve all eligible records for destruction and sign the form and return it back to the Records Liaison.
- F.   Upon receipt of the signed CORD form, the Records Liaison will complete a T-Req form and contact Logistics for transfer and destruction.
- G.   The Records Liaison will log the records in the standard Destruction/Archive Log.
- H.   Logistics oversees or directs the destruction of the records and completes the CORD.
- I.   Logistics forwards to the Records Officer and Records Liaison the completed CORD.

II.   ***Procedures for Disposing of Records Archived with Logistics (CENTRAL OFFICES ONLY):***
- A.   Every month, Logistics will review the archived records for records to be destroyed.
- B.   Upon determining which records are due for destruction, Logistics shall fill out the CORD form *except* for the last two columns regarding the Date of Disposal and Method of Disposal.

C.   Logistics will forward the CORD form to the Records Liaison for the Office that originally submitted the records for approval and confirmation of destruction of records.

D.   The Records Liaison signs the form and requests signature from his/her Office or Department Head.

E.   After obtaining both signatures, Records Liaison e-mails the form to the Records Officer at recordsretention@bcps.org for approval and signature.

F.   Records Officer shall review the form and approve if the records are eligible for destruction. If not, Records Officer shall contact Records Liaison to remove the records from the form and retain for an additional time period. The Records Officer shall approve all eligible records for destruction, sign the form and return the form to the Records Liaison and Logistics.

G.   Upon receipt of the signed CORD form, Logistics shall destroy the records.

H.   The Records Liaison will log the records in the standard Destruction/Archive Log.

I.   Logistics shall forward to the Records Officer and Records Liaison the date of disposal and method of disposal.

J.   The Records Officer and Records Liaison will fill in the last two columns on the CORD form and keep those forms **permanently**.