

**SAN JUAN COUNTY PUBLIC HOSPITAL DISTRICT#2
LOPEZ ISLAND HOSPITAL DISTRICT (LIHD)**

RECORDS MANAGEMENT POLICY

I. PURPOSE

The LIHD Records Management Policy establishes standard procedures for managing records according to the provisions of the Public Records Act (chapter 42.56 RCW) and Preservation and Destruction of Public Records (chapter 40.14 RCW). It is also intended to abide by all other state and federal statutes and regulations which govern the LIHD's records keeping practices.

II. POLICY

This policy is designed to ensure public records are organized and easily accessible, and it establishes procedures for: the systematic identification and disposal of obsolete records; transfer of historically valuable records to the State Archives system; removal of non-current records from active office storage; protection and security backup of records essential to District authority and operations; disaster preparedness; insurance of records systems integrity and accessibility; and effective compliance with public disclosure requirements.

The Records Management Policy applies to anyone acting in an official LIHD capacity. This includes the Superintendent, Commissioners and Committee Members of the LIHD.

III. RESPONSIBILITIES

The Commissioners have appointed the Superintendent to serve as the Public Records Officer (PRO). In this role, the Superintendent is responsible for ensuring proper disposition of all public records maintained by the LIHD in accordance with the most current revision of the Local Government Common Records Retention Schedule (CORE) and the Public Hospital Districts Records Retention Schedule, as published by the State Archives.

It is the responsibility of the Public Records Officer to ensure that:

- a. Only active (referred to at least once per month) records are stored in valuable office space;
- b. Non-current records are shifted to low-cost records center storage, when deemed necessary;
- c. Historically valuable records are preserved and transferred to the State Archives;
- d. Records are destroyed at the end of the retention period specified on the retention schedule(s) that are applicable to Public Hospital Districts;
- e. Records essential to District authority and operations are adequately protected from damage or loss;
- f. District will be prepared to recover or replace records damaged or lost in a disaster;
- g. All information systems preserve the integrity and accessibility of the public records they hold for the duration of their approved retention periods; and
- h. Records are accessible for public inspection and their security is maintained according to the provisions of the Public Records Act, chapter 42.56 RCW.

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The Superintendent must complete a training course within 90 days of assuming the PRO responsibilities (as required by RCW 42.56.152 & chapter 40.14 RCW for public records act and records retention, respectively), and must also complete refresher training at intervals of no more than four (4) years, as long as holding the PRO designation. In addition, the PRO is responsible for identifying appropriate training courses and documenting all Commissioners complete one of the courses within 90 days of signing the Oath of Office, and every four (4) years thereafter (as required by RCW 42.56.150 & chapter 40.14 RCW, in addition to RCW 42.30.205 for the Open Public Meetings Act (OPMA)).

IV. PROCESS FOR RECORDS DESTRUCTION

The following outlines the process for destruction of records:

- a. Superintendent shall complete a records destruction certificate when destroying primary copies of records in any format (paper, electronic, audio, etc.) that have met retention requirements.
- b. Secondary copies are generally kept for administrative use only and can be discarded when that purpose has been fulfilled. A records destruction certificate **is not** necessary when disposing of secondary or convenience copies, unless otherwise noted on the applicable retention schedule.
- c. Transitory records can be discarded when their purpose has been fulfilled. A records destruction certificate **is not** necessary when disposing of transitory records.
- d. Confidential or sensitive records, including non-paper media, must be reduced to illegible condition when destroyed, as required by WAC 434-640-020.

V. ELECTRONIC RECORDS RETENTION AND DESTRUCTION

Electronic records must be retained in electronic format and remain useable, searchable, retrievable, and authentic for the applicable retention period, in accordance with WAC 434-662-040. Printing and retaining a hard copy is not a substitute for the electronic version. Examples of electronic records include web pages and databases. Electronic records must be retained and disposed of based on content rather than format.

The same retention schedules apply to paper and electronic records. In making decisions about how long to retain electronic records, staff should first check the appropriate retention schedule(s) to ensure compliance and also verify that the records are not subject to a legal hold.

Many electronic records can be disposed of at the discretion of the Superintendent 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 retention schedule(s). Once the required retention has been met, the record should be deleted and documented on a records destruction certificate. Examples of official records include policies and procedures, executive level correspondence, and final reports.
- b. If the electronic record is transitory in nature with no administrative, legal, fiscal, or archival value, then the record can be deleted at the discretion of the user. Examples include secondary copies of memos, general office notices, general information, working copies, transmittal memos, meeting announcements, and drafts.
- c. E-mail records are subject to the same retention schedules as paper records. Many email records are transitory in nature and may be deleted when they are no longer needed. Emails, both sent and received, that require retention must be managed accordingly. The District may use programs to aid in the management, retention, and disposition of email, including deletion of messages after specific retention periods based on record series. The Superintendent and Commissioners are expected to make

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use of these programs to ensure that proper retention is applied and that emails that do not need to be retained are deleted appropriately.

- i. Some examples of email subject to retention include policy and procedure directives; correspondence or memoranda related to official business; documentation of actions, decisions, operations, and responsibilities, documentation of legal or audit issues; documents that initiate, authorize, or complete a business transaction; final reports or recommendations.
- ii. Most email consists of transitory messages and attachments that may be deleted when no longer needed. An email that has no administrative, legal, fiscal, or archival retention requirements may be deleted as soon as it has served its purpose. Some examples of email not subject to retention include information only or duplicate copies; copies of publications; miscellaneous notices or memoranda of a general and non-continuing nature (meeting notices, reservations, confirmations); preliminary drafts of notes, letters, reports, worksheets which do not represent significant steps in the preparation of record documents; requests for routine information or forms.
- iii. Use of personal email accounts (such as Yahoo or Gmail) for conducting District business is prohibited. In the event email related to the conduct of District business is received at a personal email address, it should be immediately forwarded as an attachment to the District email system.

VI. TEXT & VOICEMAIL MESSAGES

Records created or received in relation to District business—including text messages, voicemail messages, and other electronic communications—are District records. These records therefore (1) should be managed according to the applicable retention schedule, and (2) may be subject to disclosure under the Public Records Act.

The following is intended to help manage the business-related messages you send or receive on smart phones, tablets, or similar devices (iPhone, iPad, Blackberry, Android, etc.)

- a. Text messaging should only be used for routine or transitory messages that don't need to be retained by the District. Examples include informal notices of meetings, directions, scheduling information, and other routine messages that would not be kept in a file if it were a paper communication.
- b. Text messages may not be used to send policy, contract, formal correspondence, advice, or personnel related data. Sensitive information should not be sent by text message, including social security numbers, credit card numbers, and passwords.
- c. Delete transitory, business-related text messages as soon as possible.
- d. If a text message needs to be retained pursuant to a retention schedule, the Superintendent or Commissioner must transfer the messages to the District's network and/or devices.

VII. NAMING CONVENTIONS AND FOLDERS

- a. **File names.** When creating an electronic file, the originator must keep in mind that when they name the file, they are not naming it to make retrieval easy for themselves; rather, they must name the file in a manner that makes it easy for someone else to find the file. Please refer to Exhibit A for details on naming structure.

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- b. **Folders.** To facilitate document retrieval, a standard filing system has been created. Please refer to Exhibit A for details on paper document folders and filing structure, and Exhibit B for details on online folders and filing structure. The Superintendent is responsible for maintaining and updating as new folders are required. This includes working with the Commissioners to ensure they adopt the same structure for any documents and emails they retain.

VIII. 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 Superintendent. If a record(s) covered by a public records request is scheduled for destruction, the record(s) must be retained until the request is fulfilled.

IX. LOCATION OF RECORDS

District records are those that are made or received by the District in connection with the transaction of public business. For this reason, District records are required to be saved and retained in files located at the District Office, or on the District's network and/or devices. District records cannot be saved solely on a personal device or outside District networks.

X. DEFINITIONS

The LIHD adopts the definitions applicable to public records as outlined in chapter 40.14.010 and the Glossary of the CORE:

- a. **Active Record:** An active record is used in an office on a routine basis and accessed at least several times per year. Active records are usually kept on-site.
- b. **Archival (Appraisal Required) Record:** Public records with archival (appraisal required) designation are records which may possess enduring legal and/or historic value and must be appraised by Washington State Archives on an individual basis. Records not selected for retention by Washington State Archives may be disposed of after appraisal.
- c. **Archival (Permanent Retention) Record:** Public records with archival (permanent retention) designation are records which possess enduring legal and/or historic value and must not be destroyed. These records need to either be transferred to Washington State Archives or retained and preserved according to archival best practices until such time as they are transferred to Washington State Archives.
- d. **Essential Record:** Essential records are those the District 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 should be created and stored at an offsite facility.
- e. **Inactive Record:** A record used or accessed in an office infrequently or no longer used in the conduct of current business, but still required to be kept by the retention schedule for legal or historical purposes. Inactive records may be stored off-site.
- f. **Non-Archival Record:** Public records which do not possess sufficient historic value to be designated as "Archival". Agencies must retain these records for the minimum retention period specified by the appropriate, current records retention schedule. Agencies should destroy these records after their minimum retention period expires, provided that the records are not required for litigation, public records requests, or other purposes required by law.

- g. **Public Record:** RCW 40.14.010 defines public record as “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 any agency of the state of Washington in connection with the transaction of public business...”
- h. **Records Disposition:** Actions taken with records when they are no longer required to be retained by the District. Possible disposition actions include transfer to archives and destruction.
- i. **Retention Schedule:** A table setting out requirements adopted by the Washington State Local Records Committee which specifies the minimum length of time each record series must be retained by the District, whether the record is designated essential, archival, or potentially archival, and final disposition of the record.
- j. **Transitory Records:** Transitory records 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.

XI. REFERENCES

- a. Essential Records, chapter 40.10 Revised Code of Washington (RCW)
- b. Preservation and Destruction of Public Records, chapter 40.14 RCW
- c. Penal Provisions for the Intentional Destruction of Public Records, chapter 40.16 RCW
- d. Reproduced Records, RCW chapter 40.20 RCW
- e. The Public Records Act, chapter 42.56 RCW
- f. Chapters 434-600 through 434-690 Washington Administrative Code (WAC)
- g. Essential Records Manual, Office of the Secretary of State, Division of Archives and Records Management.
- h. Local Government Common Records Retention Schedule (CORE), Office of the Secretary of State, Division of Archives and Records Management.
- i. Public Hospital Districts Records Retention Schedule, Office of the Secretary of State, Division of Archives and Records Management.

Hospital District