

Regulation #2240

Retention of Electronic Records and Information

I. Records Custodian

These regulations are designed to assist in implementation of Board Policy #2240 regarding the retention of electronic records and information. These regulations supplement and do not replace District policy relating to education records.

The Superintendent of Schools shall designate a Records Custodian who will be responsible for implementation of District policies and regulations for the retention of records, including electronic messages and electronically stored information.

II. Definitions

- A. Electronic messages include e-mail, fax, instant messaging, text messaging, and Web-based messaging services. Electronic messages may be transmitted by a variety of mediums, including computers and mobile computing devices. In addition to the body of the message, electronic messages also contain metadata, such as transactional information (e.g., date and time sent, sender/receiver) and may contain attachments such as calendars, directories, distribution lists, sound recordings, photographs, images, word-processing documents, spreadsheets, and other electronic documents.
- B. Electronically stored information is information that is fixed in a tangible form and is stored in a medium from which it can be retrieved and examined. It can consist of writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any medium from which information can be obtained into useable form.
- C. Public records are any recorded data or information relating to the conduct of the public's business prepared, owned, used, or received by a public agency, whether such data or information is handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any method.
- D. Digital imaging is the process of converting original records on paper or film into electronic images. The process typically requires a document scanner or digital camera, a computer and software to capture the image, and indexing of the digitized images.
- E. Transitory correspondence consists of communication that does not relate to an individual's job responsibilities or has a short term administrative value.
- F. Routine correspondence consists of any communication that is part of or relates to commonplace tasks or duties within an office and is done at regular or specified intervals.

47 **III. Classification of Electronic Messages**

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49 The same record retention policy that applies to paper records applies to electronically stored
50 information, including electronic messages. Therefore, like paper records, the content and
51 function of an electronic record, including electronic messages, determine the retention period
52 for that document. The District will comply with all of the minimum standards set forth in the
53 Municipal Records Retention Schedules, as issued by the Office of the Public Records
54 Administrator for the State of Connecticut.

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56 Users shall use the following steps in determining whether to maintain electronic messages
57 and, if so, for how long:

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59 Step 1: Determine whether the message is a public record or a non-record.

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61 Step 2: If the message is a non-record, destroy at will (e.g., spam and unsolicited
62 advertisements).

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64 Step 3: If the message is a record, determine which records series the message belongs to, for
65 example:

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67 1. If the message is Transitory Correspondence, delete at will.
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69 2. If the message is Routine Correspondence, retain for 2 years.
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71 3. If the message is All Other Correspondence, retain for the equivalent records
72 series.

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74 Step 4: Maintain the messages for the required retention period under the equivalent records
75 series.

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77 **IV. Digital Imaging of Paper/Hard Copy Records**

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79 Paper records may be digitized and maintained as electronic records; however, in doing so, the
80 District must ensure the authenticity, reliability, integrity and usability of the reformatted
81 records. If the District uses a vendor for digital imaging services, the District remains
82 responsible for ensuring compliance with this policy.

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84 In its use of digital imaging, the District shall:

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86 1. Establish and maintain a quality assurance process to ensure the creation of accurate
87 and authentic digital images and accurate indexes and production metadata.
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89 2. Create and maintain accurate and authentic digital images in accordance with accepted
90 standards and best practices.
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92 3. Create and maintain accurate indexes and production metadata to properly identify and
93 retrieve digital images.

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4. Store and protect digital images against file corruption, alteration, or deletion throughout the designated retention period.
5. Perform periodic backups of all digital images, associated indices, and production metadata and maintain a geographically remote offsite backup copy to enable recovery and access in the event of a wide-spread disaster or emergency.
6. Perform and certify annual tests of backup media to ensure all files have been backed up and are readable.
7. Migrate digital images, associated indexes, and production metadata to a newer media platform or file format as needed to ensure the content remains accessible.
8. Define and document the normal operations and use of the imaging technology and electronic content management system to ensure system trustworthiness.

If paper public records have been converted to digital images, the District shall retain and/or dispose of the original paper records pursuant to the following guidelines.

Permanent	If records are required to be retained permanently or have been designated as archival, they may be digitally scanned and retained in an electronic format, but security copies of the records must be retained in a “human-readable” format, such as paper or microfilm. The Records Custodian must first verify with the Office of the Public Records Administrator for approval of the security copy storage format.
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Less than Permanent	These records may be transferred to a digital imaging format with disposal of the original, paper records. To dispose of the original records following their digital imaging, the Records Custodian must first obtain prior authorization from the Public Records Administrator and State Archivist (using Form RC-075.1, available from the Office of the Public Records Administrator). Following destruction of the original records, the Records Custodian must document that the paper records were destroyed lawfully.
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To dispose of digital images once the minimum retention period has expired, the Records Custodian shall obtain prior authorization from the Public Records Administrator and State Archivist. The District must document that the digital images were destroyed lawfully under the appropriate disposition authority. The District shall follow a destruction process by which content is systematically deleted with an audit trail that is legally admissible in court. Destruction should be documented by recording the date of destruction on the form “Records Disposition Authorization” and attaching any supporting documentation, or by following the District’s process for documenting document destruction. After disposing of the records in accordance with these procedures, the Records Custodian will follow all other steps required by the Office of the Public Records Administrator.

V. Retention of Electronic Records

141 Electronic messages and electronically stored information will be archived by the District for
142 their required retention period using method(s) approved by the Records Custodian, which
143 may include the following:

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- 145 1. Print message or record and store in appropriate hard copy file.
 - 146 2. Place in computer folders and save on hard drive.
 - 147 3. Save to a removable disk which is then stored in an appropriate location.
 - 148 4. Transfer to an automated records management software application.
 - 149 5. Manage at the server by an automated classification system.
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151 The Records Custodian will be responsible for working with the District Systems
152 Administrator to implement a schedule and system for reviewing electronically stored
153 information. This review shall occur at least annually. No system wide process for automatic
154 deletion of electronic information will be implemented without notice to any individual who
155 may have such information and each such individual will verify that they have reviewed and
156 archived information that must be retained. Following this review, all electronic messages
157 and/or electronically stored information that have not been archived according to District
158 policies and procedures shall be designated for deletion or archiving, and the affected District
159 Users will be notified about the procedures to be followed to implement this process. The
160 Records Custodian or designee shall follow up with notified Users to ensure compliance.

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162 Additionally, the Records Custodian, working with the District Systems Administrator, shall
163 ensure than any process for automatic deletion of electronic information from the system will
164 not delete information stored in folders and/or system locations that have been designated as
165 appropriate for archiving electronically stored information.

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167 Legal References:

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- 169 Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)
 - 170 Conn. Gen. Stat. § 7-109
 - 171 Conn. Gen. Stat. § 11-8 et seq.
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173 General Letters 96-2 and 2009-2 of the Public Records Administrator
174 Public Records Policy 02, *Digital Imaging*, of the Public Records Administrator
175 (Aug. 2014)

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177 Record Retention Schedules Towns, Municipalities and Boards of Education

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179 Connecticut State Library, Office of the Public Records Administrator, Authorization
180 for Disposal of Original (Non-Permanent) Paper Records Stored as Digital Images,
181 Form RC-075.1 (revised 12/2021)

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183 Frequently Asked Questions about E-mail, CT Public Records Administrator,
184 available at [https://ctstatelibrary.org/wp-](https://ctstatelibrary.org/wp-content/uploads/2015/05/EmailGuidelines.pdf)
185 [content/uploads/2015/05/EmailGuidelines.pdf](https://ctstatelibrary.org/wp-content/uploads/2015/05/EmailGuidelines.pdf).