

L&I Employee Policy

Records Management

General Topic: Administrative Responsibilities	Policy #: 2.10
Subject: Records Management	Issued: December 3, 2021 (supersedes policy dated 06/21/2021)
Applies to: All Employees	
Contact: Records Officer	See also: Required procedures Preservation and Retention of L&I Public Records Other resources RCW 40.14 (Preservation and Destruction of Public Records); RCW 40.14.040 (Records Officer Designation Powers and Duties); RCW 42.56.010 ; WAC 434-610 (Definitions); WAC 434-662-040 ; Employee policies 2.31-Enterprise Data Governance , 5.60-Wireless Communication Devices , 7.08-Network Accessible Data Storage , and 7.40-Social Networking

Purpose and Description

L&I employees must identify and manage their [public records](#). L&I employees must retain, destroy or transfer L&I public records per the approved record-retention schedules. The retention and destruction of public records and data are based on the content of the record, not the [delivery method](#).

Definitions

For purposes of this policy and related procedures, the following definitions apply.

Archival records have historic and/or enduring value and are kept indefinitely. The State Archivist determines what records will be designated archival. Archival records are transferred to either the [State Archives](#) or the digital archives once they have reached retention.

Delivery method includes, but is not limited to, Teams, Zoom, Skype, [text](#), voicemail, email and letters.

Digital archives is an electronic archival storage system where electronic records that have historical and/or enduring value are kept indefinitely in their original format.

Disposition of public records is any manner or method of changing the custody, location or physical state of a public record, including transfer, scanning and destruction.

Essential records are [public records](#)

Imaging system converts paper documents into digital documents. Approval is required to destroy the paper documents. Approved L&I imaging systems include ORION and IDM.

In-house destruction is the process to destroy public records.

Online archives is a system used to store and retrieve email messages that have business value to the agency.

Public record is any document or data, regardless of format, created to conduct L&I business.

Records coordinator is appointed by each division or program to help the [records officer](#) with managing and retaining their records. This role should be included in the coordinators' position descriptions.

Records inventory includes 1) A list that describes the location/[system of record](#) of all agency records, regardless of media (electronic, paper, etc.) and 2) A survey of a [public record](#) conducted by a division or program with the [records officer](#) prior to [disposing of public records](#) or developing a records-retention schedule.

Records officer is designated by the L&I director (in accordance with RCW 40.14.040 with responsibility for L&I's records management and retention program.

Records-retention schedule is the list of L&I's records series, their retention schedules and disposition requirements, as approved by the [State Records Committee](#).

Records series may consist of a single type of document or several types of documents that are filed together.

Records transmittal lists and describes the records content of boxes sent to the State Records Center.

Retention period is the minimum amount of time required to retain a records series in L&I's [retention schedule](#). The [State Records Committee](#) must approve the retention period.

Retention policy, or "retention label," IS A RETENTION PERIOD THAT IS APPLIED TO Outlook emails or Teams files. Users have several retention periods from which to choose as set up by Washington Technology Solutions (WaTach).

State Records Center provides long-term, secure storage for paper records that must be available for administrative, audit, legal or fiscal reasons for a specified [period](#).

State Records Committee is an interagency committee that approves or disapproves state agencies' recommendations regarding its [retention schedules](#), under RCW 40.14.050.

System of record is the official location where programs store their [public records](#).

Text messages are electronic messages sent through a mobile or other device. Text messages on L&I or personally owned devices are [public records](#) if the text relates to or is about L&I work.

Transitory records are typically short-term, of temporary informational use, and are not a vital part of an administrative or operational function.

Washington State Archives is a division within the Office of the Secretary of State that manages the State Records Center, Records Management and State Archives. It sets statewide policy for records management, disaster recovery of public records, records preservation and records archiving.

Policy

Roles and Responsibilities

A. The general responsibilities of all L&I employees include the following:

1. Retain paper records in their original format, except for records imaged in an approved system, such as ORION, IDM, BEAR and SERV.
2. Retain electronic records in their original format (such as emails and data in systems) in accordance with [WAC 434-662-040](#). Printing and retaining a hard copy is not a substitute for maintaining electronic records.
3. Report missing records/data in the Safety and Health Incident Reporting and Tracking System (SHIRTS) under “Report Security Incident”; the incident type is “Lost Record.” This includes reporting laptops or cell phones to ensure records on the devices are documented in the event of public-records requests.
4. Protect [public records](#) from damage or disorganization.
5. Immediately report to the [records officer](#) and the employee’s supervisor when records are damaged due to a disaster, including but not limited to fire, water, earthquake, etc.
6. Take records-management training every two years.
7. Use [text messaging](#) for [transitory](#) purposes only. Save non-transitory text and voice messages from customers to an agency-approved, permanent system of record.
8. Consult with the records officer before recording online meetings using web conferencing services (such as Zoom or Teams).
9. Effectively manage email records by:
 - a. Applying an appropriate retention policy (expiration period) to each email folder and/or individual emails for both the Inbox and Sent items.
 - b. Contacting the records officer if any email records have a retention longer than seven years per the [records-retention schedule](#).
 - c. Forwarding archival email records to the [LNI RE Records Archival Mailbox](#) to transfer to the digital archives for permanent keeping. Contact the records officer with questions about archival records.
 - d. Deleting transitory emails or moving them to the “Deleted items” folder in Outlook. Retention should not be applied to any email that will be deleted.
10. Delete records shared in Teams from their OneDrive.
11. Securely store public records within L&I offices or electronic systems. Do not permanently store L&I public records at home.
12. Do not send or store L&I records to personal devices, such as home computer, email, printers or phone.

13. Do not destroy a public record if there is notice of a lawsuit, public record request, discovery request or audit. Failing to comply could subject the employee and L&I to penalties and fines.

B. Division assistant directors (or designees) and supervisors:

1. Notify the [records officer](#) of any new [records coordinators](#) or changes to the position within a program or division.
2. Require employees to be trained and knowledgeable about records management, retention and disposal requirements.
3. Ensure employees take records-management training every two years and adhere to this policy.
4. Create disaster-preparedness and recovery plans for [essential records](#).
5. Ensure the division/program adheres to the approved [retention schedules](#).
6. Work with their records coordinators and the records officer to ensure the [retention period](#) meets legal and operational requirements. Updates must be approved by the records officer.
7. Consult with the records officer when considering whether to upgrade or replace current technology or software.
8. Ensure employees have retention policies applied to their Outlook email and folders. If unable to verify that retention is applied prior to the employee's separation, the supervisor or designee should [request access](#) to apply retention policies to the employee's Outlook email and folders.
9. Check employees' Outlook retention on email and folders during the PPAF review cycle.

C. [Records coordinators](#):

1. Comply with procedures established by the records officer.
2. Ensure their program or division adheres to the approved [retention schedules](#) and ensure all records match a designated records series.
3. Review their unique records series annually with the program manager to determine if any business processes have changed and need to be updated. Notify the [records officer](#) if any updates need to occur.
4. Work with their program manager to revise and propose updates to the retention schedules, and submit changes to the records officer.
5. Establish procedures for retention and [destruction](#) of records per the approved records-retention schedules and with the records officer's approval.
6. Keep the records officer informed about legislative changes to ensure records series are kept current or new ones are established.
7. Review and approve destruction requests from the State Records Center.

D. The [records officer](#):

1. Provides consultation and training to [records coordinators](#) and L&I employees on records management and destruction and retention requirements.
2. Serves as L&I's liaison with the [Washington State Archives](#), the State Records Center and the [State Records Committee](#).
3. Creates and manages the L&I's unique [retention schedule](#) for submittal to the State Records Committee.
4. Reviews L&I's unique records-retention schedules annually.
5. Reviews [records transmittals](#) for accuracy, and approves and submits them to the State Records Center and/or the State Archives for processing.
6. Reviews and approves [in-house destructions](#) and State Records Center destructions.
7. Conducts an [inventory](#) of all [public records](#) at least every two years.
8. Inventories and processes [essential public records](#) at least annually.
9. Reviews and approves software, mobile applications and L&I systems to ensure they meet all retention and public record requirements.
10. Approves the creation of new record series.

Preserving and Retaining L&I Public Records

E. All employees must:

1. Preserve [public records](#) based on the content of the record, and retain them until they have met the end of their designated [retention period](#).
2. Obtain approval from the [records officer](#) prior to creating or updating a new records series.
3. Store public records in a location that is secure and backed up.
 - a. Public records may not be stored on C: drives (desktop), thumb drives, CDs/DVDs or the P: drive.
 - b. Field staff may use the C: drive temporarily until they reach the office to transfer documents to the [system of record](#).

F. The Public Records Unit has authority to place a hold on email and to remove that hold when the request is complete or all legal action is final.

Imaging/Scanning Records

G. Paper records must be kept, even if they are scanned on an MFD (printer).

H. Approval is needed from the [records officer](#) to create and use an [imaging system](#) to store records electronically as an official [system of record](#).

I. Archival paper records must be kept and sent to State Archives, even if they are scanned into an approved imaging system.

Destroying and Storing L&I Public Records

- J. Public records must not be destroyed until the record has met the end of its [retention period](#), as determined by the record-retention schedules.
- K. [Transitory records](#) must be destroyed when they are no longer needed for agency business. For examples, see [Records With a Short-Term to No Retention](#).
- L. Only inactive paper files shall be sent to the State Records Center.
- M. An [In-House Destruction Request Log](#) must be completed and approved prior to destroying a public record or decommissioning a technology system or software.
To complete this form, records must be a year or older, and destruction must be pre-approved by the records officer.

Accountability

- N. Violating this policy may result in disciplinary action, up to and including termination.