



Pima County Community College District Administrative Procedure

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| <i>AP Title:</i> | Records and Information Management |
| <i>AP Number:</i> | AP 2.15.01 |
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| <i>Sponsoring Unit/Department:</i> | Office of the Chancellor |
| <i>Policy Title(s) & No(s).:</i> | Records Management, Retention and Disposition, BP 2.15 |
| <i>Legal Reference:</i> | A.R.S. § 41-151.12 – 41-151.19; § 39-101 – 39-128 |
| <i>Cross Reference:</i> | |

PURPOSE

The purpose of this administrative procedure is to provide guidelines and direction on the creation and management of information and records and to clarify staff responsibilities.

Pima County Community College District is committed to establishing and maintaining information and records management practices that meet College accountability and compliance requirements as set by the Arizona State Library, Archives and Public Records Division of the Secretary of State and other agencies that establish compliance guidelines as they relate to records. Records and information management includes areas such as inactive records, vital records, electronic records, microfilming, and records retention.

Compliance with this policy will ensure that College records contain trusted information that are well described, stored in known secure locations and mediums

accessible to staff and the public when needed. The Arizona Revised Statutes (ARS) that govern Records Management are: § 41-151.12 – 41-151.19 and portions of § 39-101 – 39-128.

The Chancellor has overall responsibility for the management of information and records at the College delegated to the Information Technology Department. The Information Technology Department, specifically IT Security, is responsible for administering the program, establishing the standards, and implementing records retention programs, managing inactive records, identifying and protecting vital records, using technologies in records management programs, securing records, and providing assistance in all records matters to requesting departments. User departments are responsible for adhering to the precepts stated in this administrative procedure regarding the proper safeguarding of the College's records in whatever formats the record is maintained.

DEFINITIONS:

A **record** is defined as:

- Any recorded information generated or received in the course of conducting business, **and** which must be maintained to meet the fiscal, legal, historical or administrative needs of the organization.

The "and" is critical in this definition. Any piece of information must meet both these criteria before it can be considered a record.

A **non-record** is defined as everything else.

SECTION 1: Foundational Principles

- 1.1 Under College Board Policy 2.15, the authority to manage PCCCD public records is delegated to the Director of Information Technology Security (College Records Officer). This authority extends to enforcing compliance with State and federal law and establishing standards for the retention, retrieval, disclosure and disposal of public records. Including, authorizing the use and deployment of Electronic Records Systems across multiple repositories and mediums throughout the College.
- 1.2 Pima Community College shall maintain records in accordance with the standards set forth in this procedure and the College Records Handbook.

- 1.3 Pima Community College employees, as public stewards, are to ensure only those records of continuing value are preserved in accordance with the general and departmental schedules as defined by the Arizona State Library, Archives and Public Records Division, FERPA, HIPPA, and the Department of Education. Records should be retained in the active office areas as long as they serve the immediate administrative, legal, or fiscal purpose for which they were created.
- 1.4 College departments shall comply with safeguards established by the Information Technology Department against the illegal removal, loss, or destruction of records. Records shall either be disposed of in accordance with an approved records retention schedule or transferred to the College Records Center until the prescribed retention period has expired. College units shall not store official College records in their individual departments for any longer than a year unless otherwise formally agreed upon with the College Records Officer and Legal Counsel.
- 1.5 Management of records is the responsibility of the owner, or creator, of the record. The Records and Information Assurance Manager will contact departmental leadership to discuss initiating the College records management program in their unit or reviewing existing records management processes to properly handle records from their creation through their destruction. Department/unit leadership is to facilitate and provide the necessary resources to meet the standards set forth in the Records and Information Management Handbook available on the Information Assurance and Records Intranet page.
- 1.6 The general and departmental records retention schedules maintained by the Information Technology Department are the official tool that establishes how long College records are to be held in whatever format they are in. Every College unit will have a current retention schedule and file plan.

SECTION 2: Roles and Responsibilities for the College Records Officer

The responsibilities of College Records Officer include the following:

- 2.1. Create and update the official College records retention schedules.
- 2.2. Manage archival records management systems.

- 2.3. Oversee electronic records management procedures (All Electronic Repositories).
- 2.4. Create and edit the Records and Information Management handbook.
- 2.5. Create a records liaisons training program.
- 2.6. Create written procedures and guidelines on:
 - Email/communication records
 - Social media accounts – records
 - Destruction of records
 - Off-site storage
 - Records of separated employees
 - Electronic records
 - Departmental Retention Schedules (File Plans)
 - Public records requests
- 2.7. Provide mandatory training to all College staff in all aspects of records management, administered through the Human Resources Office.
- 2.8. Provide guidance to staff on records access issues, including application of relevant statutes, rules and regulations and access of old records.
- 2.9. Conduct record inventory/inspection review every two years according to the Arizona State Archives and Public Records Division guidelines.
- 2.10. Conduct Essential Records evaluation every five years and submit the report to Arizona State Archives and Public Records Division.
- 2.11. Ensure College wide compliance to records and information standards.
- 2.12. Establish and manage the procedures for public records requests in conjunction with the Office of General Counsel.
- 2.13. Manage all record repositories and the disposition process.
- 2.14. Maintain the Records and Information Management Handbook, administrative procedures, training and retention schedule.

- 2.15. Manage the records retention center for all departments to ensure safe storage, quick retrieval, records confidentiality, and appropriate record disposition.
- 2.16. Assign responsibilities/guidance and training to Records Liaisons.
- 2.17. Ensure all electronic and hardcopy records be retained in accordance with the records retention schedule and approved file plans.
- 2.18. Ensure the records retention schedules are updated to reflect the current legal and regulatory requirements.
- 2.19. Deploy, implement and administer specialized systems for managing records.
- 2.20. Integrate records management into business systems and processes.
- 2.21. Manage the Records Retention Center by executing a retention policy on the disposal of records which are no longer required for operational reasons. Per statutory requirements, organizational policies and other regulations, this may involve either destruction of the records or permanent preservation in the Records Retention Center.
- 2.22. Coordinate Public Records Requests through the Information Technology Department and the Office of General Counsel.
- 2.24. Assist in planning information needs of the organization.
- 2.25. Ensure training is available and completed by all College employees when hired, and every three years thereafter.

SECTION 3: Roles and Responsibilities – Individual Department and Unit

Leadership shall ensure the procedures set by the Information Technology Department adheres to the following:

- 3.0. Ensure that each unit has identified a records liaison. Notify the Records and Information Assurance Manager of any changes in the identified records liaison.
- 3.1. Review and update records retention schedules annually.

- 3.3. Notify the Director of Information Technology Security on any departmental activity that may impact the handling of records – both electronic and physical – to include:
 - a. Cloud storage solution
 - b. Electronic records systems
 - c. Scanning equipment
 - d. Filing equipment
 - e. File (record) purges
 - f. Digital imaging requests
 - g. Transferring records to Records Retention Center
 - h. Disposition of records on any medium

SECTION 4: College Record Liaisons

The role of the College Record Liaisons, which is described in the Record Liaison Handbook, includes the following responsibilities:

- 4.1. Be knowledgeable with the College Records and Information Record Liaison Handbook, the Records Handbook and how to incorporate those procedures into the department/unit.
- 4.2. Assist in developing and enforcing records retention practices according to state statutes and any regulatory entities.
- 4.3. Manage individual department's records, which includes managing any digitization project that a department may undergo.
- 4.4. Attend record liaisons meetings.
- 4.5. Notify Information Technology Security of any potential impacts to College records due to specific changes in departmental procedures, regulations, or otherwise unspecified. *See 3.3.a for examples.*

SECTION 5: Monitoring and Review of the Records and Information Management Program

- 5.1. Compliance with this administrative procedure will be monitored by the Information Technology Department (with the support of workplace

supervisors, records liaisons, Office of General Counsel, Internal Audit and the Records Workgroup).

- 5.2. Any failure to follow these standards must be reported to College Administration and the College Records Officer for the purpose of remediation. The appropriate records liaison/College unit will be responsible for any necessary disciplinary action or changes in procedures.