

STATE OF IOWA

State Records Manual

State Records Commission

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State Records Manual

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Section 1 – Purpose

1.1. Introduction

The State Records Commission has developed this manual to help anyone who creates or maintains records for the State of Iowa Executive and Legislative Branches understand and fulfill their records management responsibilities. This manual outlines and details principles, techniques and best practices for state agency records management responsibilities under Iowa law.

The importance of State records:

Records are essential to the operation of State government. State records provide public servants the information they need to conduct programs, make decisions, and ensure administrative continuity. State records document the delivery of services, provide legal accountability, give evidence of the responsible management and expenditure of public funds, and document the historical development of government and the community it serves. Overall, State records are a public trust and an essential informational resource for State government staff and the citizens they serve.

Records management is good governance:

Good governance requires staff to be able to find and retrieve information in a timely manner so that the ability of government operations is not impaired and the rights of citizens continue to be protected according to law, rule and policy. Therefore, records management is essential for good governance. Records management is the management science that controls the quality, quantity, and cost of recorded information throughout its life cycle. Records management enables information to be available when and where it is needed in the most efficient and cost-effective manner possible. In addition, when information is no longer needed, it may be disposed of in a managed and timely manner.

1.2. History

The current “State Archives and Records Act” ([Iowa Code Chapter 305](#)) responded to a need to create consistent and efficient records management practices across the executive and legislative branches of government.

1.3. Review and Revision

The State Archives and Records Program on behalf of the State Records Commission maintain this State Records Manual. As a general practice, the State Records Manual will be reviewed annually and revised every three years. However, agency staff or members of the public can propose changes, and the governing authority can consider those proposed changes for approval at any time.

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1.4. Definitions and Key Concepts

1.4.1. Definitions - See Appendix 5A

1.4.1. Key Concepts

The Life Cycle of Records:

All records have a four-part life cycle that begins with record creation and concludes when the record is no longer necessary.

- **Creation:** A record is created when information is first received or recorded.
- **Use:** A record is in its use stage when you are using or referring to it regularly in the course of business.
- **Maintenance:** A record moves into a maintenance stage when you need it infrequently but must keep it for legal, fiscal, or administrative reasons.
- **Disposition:** The record ends its life cycle when it has out-lived its usefulness and no longer retains any legal, fiscal or administrative value to the business of government.
 - Over 97% of records are not retained beyond the lifecycle.
 - Less than 3% of records have permanent value and shall either be maintained by the agency or offered to the State Archivist for permanent preservation.

The purpose of the manual includes:

- Information concerning the implementation of rules governing records management including statewide government information policies, standards and guidelines that provide for the economy and efficiency in the creation, organization, maintenance, administrative use, security, public accountability, storage, retention and final disposition by destruction or permanent preservation of records;
- Procedures for agency interaction with the State Records Commission and the State Archives and Records Program for such activities as the development and revision of records series retention and disposition schedules, transfer of records, and destruction of records;
- Guidelines adopted by the State Records Commission to assist an agency head in implementing an efficient government records program within the agency; and
- Records series retention and disposition schedules adopted by the State Records Commission.

Exempt from the manual:

- The Iowa Judicial Branch, State Department of Transportation, and the agencies and institutions under the control of the State Board of Regents are exempt from the State Records Manual.

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- However, the Iowa judicial branch and the Iowa Department of Transportation, and the state board of regents shall adopt rules pursuant to Iowa Code Chapter 17A for their employees, agencies and institutions that are consistent with the objectives of Iowa Code Chapter 305 including this manual.
- The State Records Commission shall consider the administrative rules set forth by those exempt organizations for approval.

1.5. Statement of Authority

Under the authority of State Archives and Records Act ([Iowa Code Chapter 305](#)), the responsibility for creation and implementation of the State records program is divided among the State Records Commission (Iowa Code Section 305.8), the State Archives and Records Program under the Iowa Department of Cultural Affairs (Iowa Code Section 305.9) and each agency (Iowa Code Section 305.10). In short, the State Records Commission sets and administers State records policy; the Department of Cultural Affairs manages the program as well as provides administrative support to the Commission; and the Agencies implement and follow policy.

Records are state property. Under Iowa Code Section 305.13, all records made or received by or under the authority of, or coming into the custody, control, or possession of public officials of this state in the course of their public duties are the property of the state. The records shall not be mutilated, destroyed, transferred, removed, or otherwise damaged or disposed of, in whole or in part, except as provided by law or by rule.

Duplicate records are state records. Under Iowa Code Section 305.12, a preservation duplicate record shall have the same force and effect for all purposes as the original record whether or not the original record is in existence. A certified transcript, exemplification, or copy of a preservation duplicate record shall be deemed for all purposes to be a certified transcript, exemplification, or copy of the original record.

Iowa Code Chapter 305 covers the creation and implementation of a management program for State records and is the responsibility of the State Records Commission.

Code of Iowa

- [Title VII, Subtitle 7, Chapter 305 – State Records and Archives](#)

Iowa Administrative Code (Rules)

- [Records Commission 671](#): Chapters 1 – 15

Note: The right to examine the content contained within records of any kind is covered by Iowa Code Chapter 22 and is the responsibility of the Iowa Public Information Board.

- [Title I, Subtitle 9, Chapter 22 – Examination of Public Records](#)

Section 2 – Government Information Policies, Standards and Guidelines

2.1 Definition and Purpose of a Record

The definition of a government record is found in [Iowa Code Section 305.2.9](#).

“Record means a document, book, paper, electronic record, photograph, sound recording, or other material, regardless of physical form or characteristics, made, produced, executed, or received pursuant to law in connection with the transaction of official business of state government. “Record” does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes or stocks of publications and unprocessed forms.”

In other words, information that you create or receive in performance of your government work is considered a record, and is subject to records management statutes.

2.2 Format Neutrality - See Appendix B

As technology and practices have evolved, questions have been raised about the difference between paper and electronic records. For example, a common question is, “How long do we have to keep correspondence we’ve received in the mail versus what we receive via email?” The answer is that there is no difference; it does not matter in which form the correspondence was received, be it paper or electronic. The record is still “correspondence” and the retention period is the same for either format.

To assist state agencies in understanding the role of format, the State Records Commission has issued a policy titled “Format Neutrality for Records Retention.” The most recent version of this policy is in the appendix to this manual. Unless a format is specifically mentioned in statute, rule, or schedule the recorded information is what needs to be preserved by agencies for the length of the retention period.

2.3 Email

The policy concerning email records management is outlined in [671 IAC 15.1](#). Email is a very common records format used across government today and is defined as a record when sent or received in the course of conducting state business. An email record may include any attachments appended to the email. Just like information recorded in paper records, in order to determine the proper retention and disposition, email messages must be evaluated for content and purpose.

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Email messages that meet the definition of “record” must be retained and disposed of in accordance with records retention schedules, which have been approved by the State Records Commission. To protect the integrity of information contained in email messages that meet the definition of “record,” they must be maintained as authentic, reliable and trustworthy records for their entire retention period. Unauthorized users must not be able to modify, destroy or distribute email messages from an email storage system. At the conclusion of the retention period, the recorded information in emails that have exceeded their scheduled retention should be either destroyed or transferred to the State Archives if they are designated for permanent preservation.

2.4 Transitory Records - See Appendix 5C

Transitory records are records, irrespective of format, that facilitate the conduct of governmental actions on a temporary basis, that have only short term interest or usage, and that have no or little value in conducting state business. Transitory records may be destroyed when they are no longer needed for reference as long as they are not the subject of a pending public records request or an existing retention schedule that requires a longer retention period.

Some examples include:

- Communications related to routine and publicly available information that requires no administrative action, no policy decision, and no special compilation or research for reply. (For example reports, publications, brochures, etc.) This does not include open records requests under Iowa Code Chapter 22.
- Transmittal or routing records that accompany an email, facsimile or other record, such as a cover sheet, that do not add any substantive information to the transmitted record.
- Internal notices of fire drills, retirements, IT help desk reminders, communications to set a date and time for a meeting, holidays, charitable events, out of office messages, building notifications or similar routine matters that do not serve as the basis of official actions.

2.5 Information Classification Standards

Security:

All information created in records should be classified by the level of protection required to keep the information safe and secure. At a minimum, records must be classified as either:

- Confidential – Information protected by state or federal law;
- Sensitive - Not explicitly protected by law, but exposure could result in negative impact to government services, state government partners or citizens; or
- Public – Information not included in a protected classification.

See <https://ocio.iowa.gov/data-classification-standard> for more details.

Additional information security standards including the Stewardship and Email standards are available for review on the Office of the Chief Information officer website, under the policy section.

Open Public Records Law:

Every person shall have the right to examine and copy a public record and to publish or otherwise disseminate a public record or the information contained in a public record, unless otherwise

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provided by law. For agencies to retrieve information for public records law compliance in a timely manner, the Commission strongly advises agency heads to have staff classify records with Iowa Code 22 in mind. See <https://www.legis.iowa.gov/docs/ico/chapter/22.pdf> for more details.

2.6 General Schedules and Agency Schedules - See Appendix D & E

The Commission uses two types of retention schedules for management and disposition authority, “General” record schedules and “Agency” record schedules. General record schedules are issued by the State Records Commission and provide disposition authority for records common to all agencies of the Executive and Legislative branches of Government. Agency record schedules are proposed by the agencies themselves to the Commission for approval. Approved agency schedules only apply to the specific agency and supersede any existing general schedules that conflict.

2.7 Minimum Required Retention

Minimum required retention refers to the minimum length of time a scheduled record must be retained by an agency or staff. Agencies are strongly encouraged to retain records for only as long as they are required to do so. The Commission recognizes that agencies sometimes will need to retain

a record beyond the scheduled retention limit. However, the agency should be fully aware of the administrative, fiscal and legal implications of retaining records beyond their scheduled need. Currently all records retention schedules approved by the State Records Commission follow the principle of minimum required retention.

2.8 Flexible Scheduling

Flexible scheduling, also commonly known as big bucket schedules, refers to the use of large aggregation schedules (“big buckets”) for records series. Flexible scheduling is currently used by the State Records Commission for general schedules consisting of multiple, related series of records and/or records in electronic systems.

A traditional retention schedule, on the other hand, consists of specific items. Typically covering individual records series or electronic systems.

The benefits of a flexible schedule include substantially reducing the number of disposition authorities that need to be implemented, leading to more consistent adoption by staff and efficient implementation when records are decentralized among agency staff (as opposed to being maintained in a file station that serves an entire organizational unit). Flexible schedules reduce the number of new records schedules an agency must submit since big bucket schedule items have the flexibility to provide disposition authority when new series or systems are created. This benefit may be especially important for agencies that are developing numerous new electronic systems to carry out long-standing business processes; absent big bucket schedules, these systems would generally need to be scheduled individually.

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Also, a flexible schedule accommodates an agency's functional and records structure evolution over time because big bucket items can account for new series and systems. Moreover, if the items in a big bucket schedule are based on agency work processes and functions, as opposed to its organizational structure, there is no need to revise the schedule every time the agency is reorganized. This consideration may be particularly important for agencies that undergo relatively frequent reorganizations.

2.9. Records Officer

A Records Officer is a year-round, full-time agency official who possesses a broad understanding of programs and records of an agency and who is designated by the agency head to coordinate the agency records program for the management of all agency records – regardless of format or final disposition. To effectively manage agency records, agency heads may choose to appoint more than one records officer.

Record Officer Duties:

1. Oversees and facilitates agency efforts to inventory, evaluate and schedule records and develop methods to control the creation, maintenance and disposition of records. Notifies State Archives and Records Program when new records series are created and when changes in record keeping require new or revised schedules. Works with staff in the State Archives and Records Program to develop or revise records series retention and disposition schedules for all agency records, regardless of physical form or format.
1. Assists agency personnel in determining the correct records series schedules to apply to agency records. Reviews proposals to transfer agency records to the State Archives to assure conformity to the current approved schedules prior to signing and forwarding the transfer request to the State Archives and Records Program for final approval. Assists in the coordination of the physical transfer of records. Maintains records of records transferred from the agency.
2. Assists the agency head in documenting records officer(s) appointed by the agency head and forwards records officer documentation to the State Archives and Records Program.
3. Attends training sessions and implements training programs to assist agency staff in following records management procedures.
4. Notifies and seeks advice from the State Archives and Records Program in the event of a Continuity of Operations/Continuity of Government issue related to agency records.

Section 3 – Managing an Agency Records Program

3.1. How to Manage Paper and Electronic Records

A well-organized filing arrangement is a basic requirement for any State agency office. The agency should decide on a filing system and the necessary equipment to support that system. The primary purpose of having a filing arrangement is to know what records exist and to manage that

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information. Regulations and guidelines for records retention have become much more stringent in the past few years. Considering how rapidly technology is evolving, having a clear records management strategy in place will ensure that your organization is compliant.

The agency head shall maintain or cause to be maintained the interagency records management program, and also appoint one or more records officers to coordinate the records program within the agency and to serve as liaisons to the State Archives and Records Program. The agency records officer and State Archives and Records Program representative can help answer questions concerning keeping, storing, organizing and eventually destroying records, while staying compliant with state and federal regulations.

Some questions to consider include:

- How will you manage your paper and electronic records in light of state and other records retention standards?
- How long should your department keep records?
- What records can we destroy?
- How do we destroy records?

3.1.1. Taking an Inventory

The first step in implementing an effective records management program is to identify all record materials in your office space and storage areas. This includes all formats, including electronic records such as email, memoranda and databases. A records inventory identifies what records you have, where they are located, and in what quantity. This process not only will provide information on the volume of records stored, but also will help identify records that are no longer being created, and those that should be revised, automated, or eliminated. When taking your inventory, do not overlook attics, basements, closets, internet, servers and clouds. The purpose of the inventory is to obtain information to develop effective records retention schedules.

Taking an inventory will involve identifying records series; evaluating the administrative, legal, fiscal and historical value of those records; defining data practices implications; and identifying essential records. A *records series* is a group of records filed together because they all relate to a particular subject or agency business process.

Much of this evaluation process has already been done for you by your records officer and State Records Commission in the form of approved general and agency records retention schedules that list records series common to most entities, as well as records series specific to your agency, and also indicate how long to keep them. Examining the general and agency records retention schedules and comparing them to the records in your office will give you a good start on your records inventory.

Records in your office that are not listed on the general or agency schedule should be brought to the attention of your agency records officer. The records officer can assist with assessment of the records. This includes evaluating and classifying data, identifying essential records, determining if a records schedule exists and, if needed, proposing either an amendment to an existing schedule or a new record series to be added.

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3.1.2. Evaluating Records

To assess the length of need of each record series, consider its present and future usefulness. A realistic retention period can be determined by assessing four values for each record series: administrative, legal, fiscal and historical.

Administrative Value

Records are created to fulfill the functions for which an agency is responsible. They have value as long as they assist the agency in performing either its current or future work. The primary administrative use of most records is exhausted when the transactions to which they relate have been completed. These transactions may pertain to long-term programs, so their administrative value may be extended on that basis. Most records have a long or short term administrative values. The agency must determine this value.

Legal Value

Records have legal value if they document the rights or obligations of citizens or of the agency that created them. Some examples are legal decisions and opinions, fiscal documents representing agreements such as leases, titles and contracts, and records of actions such as claim papers and legal dockets. There may also be State or Federal laws requiring a specific retention period for certain records. For instance, statutes of limitation specify the time after which legal rights cannot be enforced by civil action in court. Once a record's age exceeds the time specified, the likelihood it will be part of a lawsuit is so small that there is often little value in keeping records beyond this point. Be certain to consult your agency legal counsel when determining the legal value of your records.

Fiscal Value

A record has fiscal value if it pertains to agency financial transactions or if it is required for an audit. In some instances, the audit requirements of the Federal and State governments must be considered. This information may be found in grant agreements or Federal or State law.

Historical Value

Some records have enduring historical value because they contain information about significant events or they document the history and development of an agency. They reflect experience and contain precedents for policies and procedures, and can be used as guides in solving present problems similar to those dealt with in the past. They are valuable to the State, to students, to researchers, to historians and to individual citizens as evidence of what took place. For assistance in determining if records may have historical value above and beyond their administrative, legal and fiscal value to the agency, refer to the [State Archives collecting plan](#) and/or contact the State Archives.

3.1.3. Determining a Retention Period

Assessing the administrative, legal, fiscal, and historical value of each record series will help you determine how long each record must be kept. Retention periods are determined and expressed in one of three ways:

- In terms of time; for example, “retain four years” or “retain permanently.”

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- In terms of an event or action; for example, “retain until audit” or “retain until case closed.”
- In terms of both; for example, “retain 6 months after audit” or “retain 3 years after case closed.”

3.1.4. Establishing Retention Periods

Establishing a retention period is done after completing the appraisal process. An important factor impacting the retention period and record storage location is how often the records are used. For example: A record that has a retention period of six years and has a lot of reference during the first two years, then almost no reference after that, will probably have a retention period that states: “Retain two (2) years in office, then transfer to the agency storage area for four (4) years, after which dispose of records.....”

A record that has a retention period of 10 years and has a high reference rate for those 10 years will probably have a retention period that states: “Retain ten (10) years in office, then dispose of records...”

A record that has an administrative reference value of three years, but also has an archival or historical value, will probably have a retention period that states: “Retain three (3) years in office, and then transfer to the State Archives for permanent preservation”.

NOTE: The term “permanent,” when used for archival retention and preservation purposes, means “forever.” Using the term permanent to define a record’s retention by the agency means that it has lasting value. Nevertheless, the term permanent should not be confused with the term “indefinite.” It should not be used when an agency actually means only a very long period of time. Retention periods of 20 or 40 years for a record are not uncommon but such retention periods are not referred to as “permanent.”

3.1.5. Classifying Records for Compliance with Open Public Records and Records Retention Requirements

Iowa Code Chapter 22 states “every person shall have the right to examine and copy a public record and to publish or otherwise disseminate a public record or the information contained in a public record.” Iowa Code Chapter 305 states agencies must provide for economy and efficiency in the creation, organization, maintenance, administrative use, security, public availability, and final disposition of government records. Classification of records is a cost effective way to comply with the management requirements outlined in Chapter 22 and 305. The inventory and classification process also alerts staff of information that, due to its nature, may have limited public accessibility and/or contains confidential or sensitive information that can’t be released and whose retention schedules must be strictly followed to be in compliance.

Information concerning confidential classification can be found at <https://www.legis.iowa.gov/docs/code/22.7.pdf> or ask your Agency Records Officer.

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3.1.6. Identifying Vital Operating Records

The term vital operating record is applied to any record that is necessary to the continuation or resumption of agency operations. This means that if a disaster occurred, you would need these records to remain in business. Generally, most agencies have a small percentage of their records that should be considered essential. The purpose of identifying vital operating records is to plan for their protection.

After you have completed your records inventory, you will have assessed the value of your records and determined a retention period for them. This information will be used in the next step, which is to establish a records retention schedule.

Records/File Administration:

The agency is responsible for developing administrative procedures to govern their records. These administrative procedures must be in compliance with its statutory obligations, Iowa Code Chapter 305, IAC 671, State Records Commission policy and the State Records Manual.

Records/File Classification Tips:

Classify administrative processes to provide a structure for understanding which processes generate reports, and how to manage these reports as public records. This includes:

- Identify the relationship between individual records to provide a continuous documenting of administrative activity;
- Name records in a consistent manner (consistent nomenclature);
- Group all records relating to a particular function or activity;
- Determine appropriate security protection and access for sets of records; and
- Assign user permissions for access to, or action on a particular group of records.

3.1.7. Record Identification Needs

- Identify statutory, administrative and functional requirements for the database processes;
- Develop a function-based classification scheme for the identification, location and linking of related reports;
- Keep links between reports and the context of their creation (metadata);
- Develop naming and indexing rules, and conventions for ease of report identification and maintenance over a period of time;
- Identify record ownership over a period of time;
- Work with the State Archives and Records Program to determine appropriate retention periods for reports and development of disposition authorities;
- Develop risk management guidelines within the context of the database/system; and
- Identify the appropriate security/protection for records, and develop access permissions and security levels. Including reviewing information security policies related to data classification, data stewardship standards and email security on the OCIO website.

3.2. The Records Retention Schedule: What Must Be Kept and For How Long

3.2.1. Responsibilities

State employees and anyone working on behalf of the State bear the responsibility of managing permanent and non-permanent records. Records retention schedules are essential to State records management. These schedules define legal and compliance related recordkeeping requirements for each State agency and function. State Archives, in administration of the State Records program, has implemented records retention schedules as an easy to understand system for agencies and staff. Schedules are a representation of bureaucratic organization by record series, as well as the definition and rules for each record series. The records retention schedule mirrors organization of agency offices and functions.

Records retention schedules serve as a State Agency's legal authority to retain and purge records and, therefore, hold great importance. The records retention schedule captures all of the types of records created and used by an agency in the course of its business and indicates how long these records are required to be retained. A retention schedule needs to be developed and applied in a systematic manner, as part of the agency wide records management strategy to comply with Iowa Code Chapter 305. Development and implementation of a retention schedule are important elements in ensuring a sound records management program.

As you do your part to manage the ever-growing expanse of State government records, please keep in mind three very important points:

1. Record means a document, book, paper, electronic record, photograph, sound recording, or other material, regardless of physical form or characteristics, made, produced, executed, or received pursuant to law in connection with the transaction of State government official business. Record does not include library and museum related material made or acquired and preserved solely for reference or exhibition purposes or stocks of publications and unprocessed forms.
2. Records are state property. All records made or received by or under the authority of or coming into the custody, control, or possession of public officials of the State in the course of their public duties are the property of the state. Records shall not be mutilated, destroyed, transferred, removed, or otherwise damaged or disposed of, in whole or in part, except as provided by law or by rule.
3. Iowa Code Chapter 305 is the law that gives the State Records Commission the authority and responsibility to develop records series retention and disposition schedules. These retention schedules describe the length of time records series of an agency or multiple agencies must be retained in active and inactive status and provide authorization for a final disposition of the records series by destruction or permanent retention. In order to implement the approved retention schedules at the agency level, agency heads are responsible for appointing one or more records officers to be the point of contact with the state archives and records program. Records officers have access to the state records manual, which includes retention schedules for all state government records.

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As agency staff manage their files, the approved retention schedules assist you to determine:

1. Which records are still active and therefore must be kept in your office for a predetermined length of time;
2. Which records are eligible to be destroyed;
3. Which records must be preserved permanently by the agency; and
4. Which permanent records can be transferred to the State Archives.

3.2.2. Risks of Not Having Retention Schedules

As the volume of retained government records expand, so do the associated risks of not having retention schedules. Establishing how long to retain records requires the development and implementation of a credible records retention policy as outlined under Iowa Code Chapter 305. Irregularity or inconsistency in an agency's records program implementation, absence of schedules altogether or outdated schedules can affect public perception of that agency. Absent a legal hold or another viable reason, keeping records for longer or shorter times than guidelines dictate exposes an agency to unnecessary risk. An agency's successful implementation of the State Records Program will result in one or all of the following benefits:

- Improve the overall utilization of resources
- Control the unrestrained growth of records volume
- Demonstrate compliance with statutory and regulatory recordkeeping requirements
- Enforce the consistent implementation of recordkeeping policies
- Improve the ability to locate and retrieve records when required
- Reduce litigation risks

3.2.3. Record Retention Schedules

The basis of any good records management program is the implementation of well-developed records retention schedules. A *retention schedule* is a plan for the management of your records. It lists your entity's records and how long they should be kept. The purpose of a retention schedule is to provide continuing authority to dispose of or transfer records to the State Archives.

There are two methods of establishing a retention schedule for your agency: adopting the general schedule that applies to records maintained by your agency or developing a specific schedule for your agency.

Adopting and Using a General Schedule:

As stated earlier, the [State Archives and Records Program webpage](#) provides general records retention schedules for many record types. These schedules identify common records series, their retention periods, and their data practices classifications. You may adopt a general schedule even though your agency does not have all the records listed on it. Retention periods listed on a general schedule represent the minimum amount of time that you must keep records. If you need to keep some records series longer than the listed retention, you should establish an agency policy for those records.

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Records Not on a General or Agency Schedule:

Records not listed on a general or agency schedule cannot be destroyed. The State Archives and Records Program recommends in this case the agency either propose to the State Records Commission to adopt a change to an existing or add a new general or agency schedule.

Records No Longer Created:

If, as a result of your inventory, you find records that are not on a general schedule, are no longer being created and have reached the end of their useful retention, permission to destroy them should first be obtained by submitting a request to the State Records Commission. Please contact the State Archives and Records Program to advise of need to dispose of non-scheduled records that are no longer maintained and needed by your agency.

Developing The Agency Retention Schedule:

Records in your office that are not on a general schedule or an agency schedule but are still being created should be added to a retention schedule. For your convenience, a form for proposing records series for scheduling is available on the State Archives website. Instructions are provided on the form to create a new schedule or amend an existing schedule.

In the form, please be certain to include:

Record series name. The name should be concise, but sufficiently descriptive to distinguish the record series name from other records series.

Record series description. Sufficient detail should be provided to describe the function documented by the record series and the nature of informational content routinely included in the record series.

Record series cutoff. The “cutoff” describes the routine point in time from which the length of retention of the record series is calculated. The cutoff is the trigger that sets in motion the prescribed retention period. Completion of the matters routinely documented by the record series is typically the appropriate cutoff; for example, case file closure, transactional payment date, expiration of license, etc. are typical cutoff triggers. For convenience, nevertheless, it is often appropriate to designate the end of year (fiscal or calendar, as needed) during which the cutoff action occurs as the cutoff for retention schedule purposes.

Record series retention. The retention period is the length of time after the cutoff that record information is routinely needed.

Rationale. The proposal should state why the proposed length of retention is appropriate. As noted, the retention period takes into account the length of need for recorded information to satisfy routine administrative, legal, fiscal and historical need for that information. For example: “The record series is no longer routinely needed for administrative use once 3 years have elapsed after the cutoff;” “The statute of limitation for the matter documented by the record series expires 10 years after the matter’s closure;” “No further claim is allowed if submitted later than 10 years past the original transaction date,” etc.

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Before submitting to the State Archives for State Records Commission consideration, the agency should work with their legal counsel for review and obtain director approval.

The proposal should be forwarded to the State Archives and Records Program at least one month before the scheduled Commission meeting. [You can view Commission meeting dates on the website.](#) State Archives and Records Program staff will then advise the agency submitting the proposal to be certain that the proposal information is adequate for consideration by the Commission.

Once all preparatory questions concerning the proposal are resolved, the proposal may be placed by the State Archives and Records Program onto the Commission agenda for consideration at its next meeting. The agency record officer or other responsible party in the agency (for example, a program manager or administrator) submitting the proposal must then attend the meeting to present the proposal and respond to such questions that the Commission members may have.

Upon approval by the Commission, the proposal comes into force 20 days later.

Agency Retention Schedule Changes:

Adding New, Changing Existing or Removing Records Series:

As you create new records series not on the general schedule or your agency schedule, develop another retention schedule for your agency listing only those new items. Follow the procedures listed under “Developing Your Own Retention Schedule,” above, when compiling the records retention schedule.

Changing the Retention:

After your schedule has been approved, the length of time you need to keep your records may change as a result of legislation or an administrative decision by your agency. When this occurs, follow the same procedure described under “Developing your own retention schedule,” above, for proposing a retention schedule modification. When the new schedule is adopted, it will supersede your current schedule for those items changed. When submitting the proposal form, indicate that it is a revision and include the current retention schedule number. Be sure to clearly indicate which items are being revised and use the same item number(s) from the previously approved records series. Complete the schedule indicating the new retention period.

Changing Record Format or Storage Media:

The State Records Commission has adopted a policy of format neutrality for records retention purposes. The exception to this would be in instances in which there is a statutory requirement to maintain a specific format. A records retention schedule applies to the official version of the record (also called the “copy of record”) within an agency, regardless of the format, unless the schedule specifies otherwise. For example, a retention period of “6 years” for accounts payable records would apply to all records within that series, even if some are in paper format, some are electronic, and some are on microfilm. You may change the format of a record, and still apply your normal retention period to the version that you consider to be your official copy of record. However, since many older retention schedules do specify particular media formats, it is a good practice to update your retention schedules when you make significant changes to make the schedules format and media neutral.

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Retention Schedule Approval Workflow:

The State Records Commission typically meets every 14 weeks, on the second Thursday in January, April, July and October.

- Week 1-8 – Agency contact the State Records Program to informally discuss their proposed changes
- Week 9 – State Records Program sends out first official notice to submit schedule change proposals
- Week 11 – State Records Program sends out final official notice to submit schedule change proposals
- Week 12 – Agency schedule change proposals due
- Week 13 – Seven days prior to the State Records Commission meeting, State Records program publishes proposed schedule changes
- Day of State Records Commission meeting, an agency representative must attend the meeting to present the schedule proposal.

General Retention Schedule Changes:

Since changes to the general retention schedule affect numerous agencies, the State Archives and Records program develops and brings the proposed changes on behalf of agencies to the State Records Commission. Contact the State Archives and Records Program to request general schedule revisions.

3.2.4. Records Disposal

Once the approved minimum required retention is reached, and there are no legal holds or no open public records requests to which records are relevant, the agency has the authority

(permission) to dispose of records. The records retention schedule duly authorized by the State Records Commission grants that authorization, taking into account administrative, legal and fiscal needs for records that have been identified by the recordkeeping agency. The records retention schedule indicates how long records must be retained and, upon expiration of that term, when it is legitimate for the recordkeeping agency to dispose of records. The schedule also indicates whether records are to be disposed by destruction or by offering to the State Archivist to be appraised for possible permanent preservation as State archives.

Agencies may retain records longer than the minimum term required by the retention schedule when doing so is useful to agency functions. Also, when there are outstanding legal holds or public records requests to which records may be relevant, it is necessary and appropriate to withhold those records from destruction until the legal needs or records request have been satisfied. Generally, however, when records (irrespective of paper or digital format) are authorized to be destroyed or transferred to the State Archivist for preservation as State archives, the record keeping agency may free storage space, as well as reduce data retrieval costs, records maintenance costs and legal liability, by eliminating those records as authorized by the retention schedule.

The recordkeeping agency should also document which records are being eliminated. A record should be maintained of the records series name, records date ranges and date upon which those records were destroyed, in order to document the records' elimination according to the records retention schedule.

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When destroying records, the agency must take care to destroy the records in a way that prevents their informational content from being intelligible to human users or used by automated systems. In order to render records content unusable, unless otherwise prescribed in statute or rule, the agency should destroy records using secured shredding or other method of secured destruction. In the case of digital records stored on agency or third party servers, the agency should work with its IT staff, CIO or the OCIO to identify and use appropriate digital data destruction technology. For paper records, the Department of Administrative Services Procurement Division maintains master state contracts for records destruction services as well as format conversion services from paper to electronic formats.

Section 4 – Preservation of Permanent Records

Some retention schedules are designated as pertaining to records to be permanently preserved. These permanent records in almost every case are historic in nature. In some cases records have permanent archival value to the State and may be transferred to the State Archives of Iowa per Iowa Code Chapter 305 and IAC 671.

In all other cases where the records are permanently scheduled but not designated for transfer to the State Archives, these records shall always be retained within the state agency in which they were created. All permanently scheduled records in the custody of an agency must always be preserved and the agency has the legal, administrative and fiscal obligation to assure the recorded information in that record format is permanently available without end. Agencies may contact the State Archives for advice in determining preservation of permanently scheduled historical records.

4.1. Archival Records on Retention Schedules

The determination of whether or not a particular record series is archival and should ultimately be transferred to the State Archives is usually made at the time the retention schedule is approved. Before the State Archives of Iowa brings forward new or updated retention schedules for State Records Commission consideration, the Archives staff will study each series listed on the proposed schedule. If a particular record series has potential archival value, it will be indicated on the retention schedule. This has already been done on the general schedules.

Two factors determine if a particular record series has archival value. Archives staff first consider whether the record has evidential value that documents the existence and operations of the State or local government entity.

These administrative and policy-documenting records form the basis of the agency's archives, without which an adequate history of the agency may not be had. Examples of such basic archival records include annual/biennial reports; minutes of boards, commissions, or advisory bodies; newsletters and publications of the entity; and administrative correspondence of the entity's head.

Archives staff will also consider whether the record in question has informational value over and above any evidentiary value. Informational value does not necessarily contribute to an

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understanding of how an entity functioned; however, it does contain information that researchers will be able to use in future years. For example, court case files will contain information about specific individuals, events and practices that are of historical significance beyond what they might tell of how the court system functioned. Individual program files of an entity frequently have informational value.

State Archives records holdings consist of permanently scheduled government records in its legal and physical custody. All records that are scheduled to come to State Archives must be accompanied by an [Archives Transfer Authority form](#) which documents transfer of the legal custody from the creating authority to the State Archivist.

Under Iowa Administrative Rule [223 IAC 3.9\(17A,22\)](#) Availability of records, the State Archives classifies its holdings as either general records, confidential records, ancient records or vital statistics.

- General records in the State Archives are open for public inspection unless otherwise provided by rule or law as designated by the transferring agency. Records in the State Archives are open for copying unless, in the opinion of the custodian, reproduction by photocopying would adversely affect the physical condition of the records or there are legal considerations that prohibit copying.
- Confidential records created by other State agencies are sometimes included among State Archives records holdings. When transferring records to the state Archives, an agency shall identify which of those records are confidential. Unless otherwise required by law, any confidential record in an agency shall retain its confidential record status after its transfer to the State Archives.
- Ancient records in the custody of the State Archives, notwithstanding any confidentiality designation by the transferring agency, shall be available for public examination and copying once those records are more than 100 years old unless: a. The record is ordered to be sealed and is not subject to inspection by any court; or b. Federal law, rule, or regulation prohibits disclosure of the record.
- Vital statistics: notwithstanding any confidentiality designation, the following vital statistics records in the state archive may be inspected and copied as of right: a. A record of birth that is at least 75 years old. b. A record of marriage that is at least 75 years old. c. A record of divorce, dissolution of marriage, or annulment of marriage that is at least 75 years old. d. A record of death or fetal death that is at least 50 years old.

4.2. Records Not on Retention Schedules

Occasionally, agencies will find inactive records stored in a basement, storage room, attic or closet for many years that were overlooked during the inventory process. Ideally, you should add these records to your retention schedule. Alternatively, if the records are clearly no longer created or maintained by the agency, a request may be made to the State Archives and Records Program for a one time State Records

Commission authorization to destroy the records. State Archives staff can advise concerning how to obtain formal permission to dispose of the non-archival records. State archives staff can also advise

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concerning separating any archival records from those of temporary value. At that same time, some or all of the archival records may be transferred to the State Archives for permanent preservation.

Section 5 - Appendix

5.A. - Definitions

1. “Agency” means any executive or legislative branch department, office, commission, board, or other unit of state government except as otherwise provided by law.
2. “Active Records” are records that continue to be used with sufficient frequency to justify keeping them in the office of creation; current records.
3. “Ancient Records” are records in the State Archives that are more than 100 years old and notwithstanding any confidentiality designation by the transferring agency the record shall be available for public examination and copying. Unless the record is ordered sealed and is not subject to inspection by any court; or Federal law, rule, or regulation prohibits disclosure of the record.
4. “Archives” means records that have been appraised by the state records commission as having sufficient historical, research, evidential, or informational value to warrant permanent preservation and that have been transferred to the custody of the state archives.
5. “Big Bucket/Flexible Scheduling” is a type of flexible schedule in which disposition instructions are applied against a body of records that are grouped at a level of aggregation greater than the traditional file series/electronic system and that can be organized along a specific program area, functional line, or business process. The goal of this type of flexible scheduling is to provide for the disposition of records at a level of aggregation that best supports the business needs of agencies, while ensuring the documentation necessary to protect legal rights and guarantee government accountability.
6. “Commission” means the state records commission created in section 305.3.
7. “Custody” means guardianship or control of records, including both physical possession, referred to as physical custody, and legal responsibility, referred to as legal custody, unless one or the other is specified.
8. “Designee” means an appointee of a commission member listed in section 305.3, who is a year-round, full-time state employee, appointed to regularly represent the commission member in the activities of the commission for a period of at least two years.
9. “Destruction” is the disposal of documents of no further value by incineration, maceration, pulping, or shredding.
10. “E-mail” is a computer-generated message transmitted or received by means of a computer network. An E-mail may contain any combination of text, Internet Uniform Resource Locator (URL) links, attached files and associated metadata.
11. “E-mail messages” are individual E-mail transmissions sent or received.
12. “File plan” designates the physical and/or virtual location(s) at which an agency’s files are to be maintained, the specific types of files to be maintained there, and the organizational element(s) having custodial responsibility. Also: A document containing the identifying number, title or description, and disposition authority of files held in an office.

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13. “Filing system” is a set of policies and procedures for organizing and identifying files or documents to speed their retrieval, use, and disposition. Sometimes called a Recordkeeping System.
14. “Frozen records” held longer than required by the record series retention and disposition schedule for litigation, investigation, or audit purposes. Frozen records can be destroyed only after completion of litigation, audit, or investigation and notification from the appropriate authority.
15. “Government records program” means a systematic state government program for the creation, organization, administrative use, maintenance, security, public availability, and final disposition of records.
16. “Guideline” means a suggested method of operation for specific activities.
17. “Metadata” is the contextual information (i.e., sender, recipient, creation date, and transmission information) that is used to understand and access other information.
18. “Minimum required retention” refers to the minimum length of time a scheduled record may be retained by an agency or staff. Agencies are strongly encouraged to retain records for as long as they are required to do so. Currently all records retention schedules approved by the State Records Commission follow the principle of minimum required retention.
19. “Non-record materials” means documents and informational materials that do not meet the statutory definition of a record (Iowa Code section 305.2(9)) or that are excluded from the definition. Non-record materials include library and museum material made or acquired and preserved solely for reference or exhibition purposes, stocks of publications and unprocessed forms, and extra copies of documents made, acquired or received only for convenience or reference purposes.
20. “Policy” means a basic statement describing the boundaries within which activities are to take place.
21. “Office of record” means the agency in which a record, as defined in Iowa Code section 305.2, is created, produced, executed or received in connection with official business of that agency. The office of record is responsible for maintenance and disposition of records in accordance with approved records series retention and disposition schedules.
22. “Organizational arrangement” is a method of arranging a schedule in a structure consistent with the hierarchical arrangement of an agency, such as by bureau or other major unit, and thereunder by its subordinate units, such as divisions or offices.
23. “Record” means a document, book, paper, electronic record, photograph, sound recording, or other material, regardless of physical form or characteristics, made, produced, executed, or received pursuant to law in connection with the transaction of official business of state government. “Record” does not include library and museum material made or acquired and preserved solely for reference or exhibition purposes or stocks of publications and unprocessed forms.
24. “Record formats” are the physical or electronic mediums containing information recorded in the course of conducting state business. Iowa Code chapter 305 requires state agencies to manage the content they create under existing approved Records Retention schedules irrespective of the formats their records are stored on (e.g. electronic, microfilm, email, digital image, paper, audio or video recording, etc.).
25. “Recorded information” includes all traditional forms of records, regardless of physical form or characteristics, including information created, manipulated, communicated, or stored in digital or electronic form.
26. “Records inventory” means a detailed listing of the volume, scope, and complexity of an agency’s records that is compiled for the purpose of creating records series retention and disposition schedules.

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27. “Records lifecycle” is the management concept that records pass through four stages: creation, use, maintenance and disposition.
28. “Records management” is the planning, controlling, directing, organizing, training, promoting, and other managerial activities related to the creation, maintenance and use, and disposition of records, carried out in such a way as to achieve adequate and proper documentation of state policies and transactions and effective and economical management of agency operations.
29. “Records officer” means a year-round, full-time agency official who possesses a broad understanding of programs and records of an agency and who is designated by the agency head to coordinate the records program or programs within the agency.
30. “Records Retention Schedule” is the foundation of an effective records management program. It is a policy document that defines an organization's legal and compliance recordkeeping requirements. A timetable established by the State Records Commission that describes the length of time a records series of an agency or multiple agencies must be retained in active and inactive status and provides authorization for a final disposition of the records series by destruction or permanent retention.
31. “Reference copy” is a copy of a record kept for easy access to the information the record contains. A reference copy of a record may be distributed to make recipients aware of the content of the record but not to direct the recipient to take action on a matter.
32. “Retention” is the minimum length of scheduled time a record must be kept (either in the office or in off-site storage) because it is needed for ongoing business, to document an action, or for statutory reasons. Note: This is also referred to as a “retention period.”
33. “Scheduling” is the process of determining and recording in a records schedule the appropriate retention period and ultimate disposition of a series. The records thus provided for are called scheduled records.
34. “Standard” means a specific rule or principle established to measure quality or value.
35. “Transitory records” are records, irrespective of format, that facilitate the conduct of governmental actions on a temporary basis, that have only short term interest or usage, and that have no or little value in conducting state business.
36. “Unscheduled records” are those records whose final disposition has not been approved by State Records Commission. Unscheduled records may not be destroyed or deleted.
37. “Vital operating record” means a record containing information essential to continue or to reestablish an agency in the event of a natural or other disaster, allowing the re-creation of the state’s legal and financial status, and the determination of the rights and obligations of the state and its citizens.

5.B. - Format Neutrality

State Records Commission

Format Neutrality for Record Retention Policy

Approved by State Records Commission on May 3, 2016

Records “formats” are the physical or electronic mediums containing information recorded in the course of conducting state business. Iowa Code chapter 305 requires state agencies to manage the content they create under existing approved Records Retention schedules irrespective of the formats their records are stored on (e.g. electronic, microfilm, email, digital image, paper, audio or video recording, etc.). Government agencies under the policy of “Format Neutrality for Record Retention” may retain records in any format without specifying a specific format in a retention

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schedule. Duplicative record formats may be destroyed once the record exists in its final format for retention unless one of the following exceptions applies:

1. Statutory or regulatory requirements, or order of any court or other adjudicative body with jurisdiction, prescribe the format for maintaining records or proscribe the destruction of existing record formats.
2. When a record is permanently preserved in State Archives, the State Archivist and the government agency shall coordinate the appropriate format of record for retention in the State Archives.

For avoidance of doubt, a record is “duplicative” if it has been copied into another format that is equally accessible, readily capable of being produced in response to any open records or discovery request, and contains 100% of the information contained in the original format. Agencies may convert content from one record format to another to accommodate agency need and technological advancement. The content in all preserved records, irrespective of format, must always be completely accessible for the entire length of the scheduled retention. Agencies must assure the content in the record formats they preserve per retention schedule is viable, verifiable, searchable and retrievable.

5.C. - Transitory Records

State Records Commission

Transitory Records Policy

Approved by State Records Commission on July 14, 2016

Transitory records are records, irrespective of format, that facilitate the conduct of governmental actions on a temporary basis, that have only short term interest or usage, and that have no or little value in conducting state business. Transitory records may be destroyed when they are no longer needed for reference as long as they are not the subject of a pending public records request or an existing retention schedule that requires a longer retention period.

Examples of transitory records include:

1. Communications related to routine and publicly available information that requires no administrative action, no policy decision, and no special compilation or research for reply. (For example reports, publications, brochures, etc.) This does not include open records requests under Iowa Code Chapter 22.
2. Transmittal or routing records that accompany an email, facsimile or other record, such as a cover sheet, that do not add any substantive information to the transmitted record.
3. Internal notices of fire drills, retirements, IT help desk reminders, communications to set a date and time for a meeting, holidays, charitable events, out of office messages, building notifications or similar routine matters that do not serve as the basis of official actions.

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5.D. - [General Schedules](#)

5.E - [Agency Schedules](#)