

**Series 2000
Administration**

**POLICY REGARDING RETENTION OF
ELECTRONIC RECORDS AND INFORMATION**

I. POLICY

The Interdistrict School for Arts and Communication (ISAAC) Governing Board (the "Board") complies with all state and federal regulations regarding the retention, storage and destruction of electronic information and records. The Executive Director or his/her designee shall be responsible for developing and implementing administrative regulations concerning the retention, storage, and destruction of electronic information and the dissemination of such administrative regulations to all employees.

II. USE OF E-MAIL AND ELECTRONIC COMMUNICATIONS

The ISAAC provides computers, a computer network, including Internet access and an e-mail system, as well as any electronic devices that access the network such as wireless and/or portable electronic hand-held equipment that can be used for word processing, wireless Internet access, image capture and recording, sound recording, information transmitting and/or receiving, storing, etc. (including but not limited to, personal laptops, Smartphones, network access devices, Kindles, Nooks, cellular telephones, radios, walkmen, CD players, I-Pads or other tablet computers, walkie-talkies, Blackberries, personal data assistants, I-Phones, Androids and other electronic signaling devices), (referred to collectively as "the computer systems"), in order to enhance both the educational opportunities for our students and the business operations of the ISAAC.

Electronic messages sent by school officials and employees as part of their work and/or by using the ISAAC's computer systems and/or network are not private communications and are potentially subject to disclosure. Employees must understand that the Board has reserved the right to conduct monitoring of these computer systems and may do so *despite* the assignment to individual employees of passwords for system security. Any password systems implemented by the ISAAC are designed solely to provide system security from unauthorized users, not to provide privacy to the individual system user.

The system's security aspects, message delete function and personal passwords may be bypassed for monitoring purposes. Therefore, employees must be aware that they should not have any expectation of personal privacy in the use of these computer systems. This provision applies to any and all uses of the ISAAC's computer systems, including any incidental personal use permitted in accordance with the Board's policy and regulations regarding computer use by employees.

Any retained messages may be retrieved as part of routine monitoring by the Board, an employee investigation or a formal discovery process as part of litigation. Employees should bear in mind that e-mail messages may be retained at different locations within the computer network and that these messages are subject to retrieval. Consequently, employees should use discretion when using computers or other electronic technology to send, record or retain electronic communications and information.

III. RETENTION OF ELECTRONICALLY STORED INFORMATION

Electronic communications on ISAAC computers or electronic communication systems shall be retained only as long as necessary. The same record retention policy that applies to paper records applies to electronically stored information, including e-mail communications. Therefore, like paper records, the content and function of an electronic record, including e-mail communications, determines the retention period for that document. The ISAAC will comply with all of the minimum standards set forth in the Municipal Records Retention Schedules, as issued by the Office of the Public Records Administrator for the State of Connecticut.

In addition to the retention guidelines established by the Board and used by ISAAC officials and employees, all school officials and employees have a duty to preserve all records and electronic information, including records and electronic information that might otherwise be deleted or destroyed, that relate to any matter that is currently in litigation or may be anticipated to involve future litigation.

Legal References:

Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)
Conn. Gen. Stat. § 7-109
Conn. Gen. Stat. § 11-8 et seq.
General Letters 98-1, 96-2, 2001-1 and 2009-2 of the Public Records
Administrator
Record Retention Schedules Towns, Municipalities and Boards of Education

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**Series 2000
Administration**

**ADMINISTRATIVE REGULATIONS REGARDING THE
RETENTION OF ELECTRONIC RECORDS AND INFORMATION**

I. RECORDS CUSTODIAN

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

The Executive Director shall designate a Records Custodian who will be responsible for implementation of ISAAC policies and regulations for the retention of records, including e-mails and electronically stored information.

II. DEFINITIONS

- A. E-mail is a means of sending messages between computers using a computer network or over a modem connected to a telephone line. This information consists primarily of messages, but may also include attachments such as calendars, directories, distribution lists, sound recordings, photographs, images, word-processing documents, spreadsheets, and other electronic documents. E-mail is stored in a digital format rather than on paper and is retrievable at a future date.
- 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, 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.

III. E-MAIL CLASSIFICATION

The same record retention policy that applies to paper records applies to electronically stored information, including e-mail communications. Therefore, like paper records, the content and function of an electronic record, including e-mail communications, determines the retention period for that document. The ISAAC will comply with all of the minimum standards set forth in the Municipal Records Retention Schedules, as issued by the Office of the Public Records Administrator for the State of Connecticut.

Further guidance on the retention of e-mail messages sent and received by school officials is provided by classifying e-mails into one of three categories. Retention guidelines for each of these categories are as follows:

Transitory Transitory messages are not essential to the fulfillment of statutory obligations or to the documentation of ISAAC functions. Employees and Board officials who receive or retain transitory communications may delete them at will without obtaining prior approval from the Records Custodian.

Less than
Permanent Messages other than transitory messages may fall into the category for less than permanent or permanent retention based on the ISAAC records policy. Follow the retention period for equivalent hard copy records as specified in the ISAAC's records retention guidelines. The retained record must be in hard copy or in an electronic format which can be retrieved and interpreted for the retention period. When there is doubt over the retrievability of an electronic record during the duration of that record's retention, the record should be printed out. Electronic records falling into the Less than Permanent category may be deleted only after making and retaining a hard copy or after obtaining signed approval from the Office of the Public Records Administrator. Either the hard copy or the electronically stored information must be retained for the minimum retention period as set out in the Municipal Records Retention Schedules.

Permanent Records must be retained permanently. The electronic record may be deleted after a hard copy printout is made or after it is stored as microfilm that meets microfilm standards issued in General Letter 96-2 of the Public Records Administrator. The retained information must be readable without further decoding.

IV. DIGITAL IMAGING OF PAPER/HARD COPY RECORDS

Paper records may be digitized and maintained as electronic records pursuant to the following guidelines.

Permanent	If records are 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.
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.

All digitized images of records must be indexed to ensure their proper identification and later retrieval. A backup copy of the digital images shall be stored in a location that is geographically separate from the location where the original digital images are stored. As with paper records, digital images of records shall be retained for the minimum retention period as specified for the records retention scheduled currently in effect. Should Cloud Storage be utilized for the storage of digital images or electronic information, the service agreement with the provider must contain a provision that ensures any data or records remain the legal property of the Board.

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. Digital images must be destroyed in a manner that ensures that any confidential or sensitive information cannot be practically read or reconstructed. Recorded media that has been used for electronic records containing confidential information shall not be reused.

V. RETENTION OF ELECTRONIC RECORDS

E-mail and electronically stored information will be archived by the ISAAC for their required retention period using method(s) approved by the Records Custodian, which may include the following:

1. Print message or record and store in appropriate hard copy file.
2. Place in computer folders and save on hard drive.
3. Save to a removable disk which is then stored in an appropriate location.
4. Transfer to an automated records management software application.
5. Manage at the server by an automated classification system.

The Records Custodian will be responsible for working with the ISAAC Systems Administrator to implement a schedule and system for reviewing electronically stored information. This review shall occur at least annually. No system wide process for automatic deletion of electronic information will be implemented without notice to any individual who may have such information and each such individual will verify that they have reviewed and archived information that must be retained. Following this review, all e-mails and/or electronically stored information that have not been archived according to ISAAC policies and procedures shall be designated for deletion or archiving, and the affected ISAAC employees will be notified about the procedures to be followed to implement this process. The Records Custodian or his/her designee shall follow up with notified employees to ensure compliance.

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

Legal References:

Conn. Gen. Stat. §§ 1-200(5); 1-211; 1-213(b)(3)
Conn. Gen. Stat. § 7-109
Conn. Gen. Stat. § 11-8a et seq.
General Letters 98-1, 96-2, 2001-1 and 2009-2 of the Public Records Administrator
Record Retention Schedules Towns, Municipalities and Boards of Education
Public Records Policy 02: Digital Imaging
Office of Public Records Administrator: Digital Imaging Standards, 2014

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