Local Health Department (HD) Retention Schedule Q&A

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What You Need To Know To Understand Any Answers About Retention and Destruction

1. What is a Copy of Record?

- a. The Copy of Record is the version of a record that your office is using to fulfill any records retention requirements.
 - i. The Copy of Record designation can be assigned to a different version of the record
 - 1) in the same or a different format
 - 2) at any time
 - 3) as long as the new Copy of Record contains all of the information from the previous one.
 - ii. When you destroy a record according to a retention schedule or an approved <u>PR-1A (SF 30505)</u>, what you are destroying is your Copy of Record.
 - 1) At the point of destruction, the Copy of Record should be the *only* copy of the record that you have.
 - 2) If it's *not* the only copy, then you haven't destroyed the record. You've just made the copy you still have into your Copy of Record, and you're still responsible for responding to public records requests for it.

2. What is a Duplicate?

- a. **Duplicates** are any copies of a record you have which are *not* the Copy of Record.
 - i. They are considered non-record material and may be destroyed whenever they're no longer of use. No form necessary.
 - ii. The <u>SF 44905 (Notice of Destruction)</u> should only be filled for your Copy of Record, not for destroying duplicates.

1. Do all records need to be permanently kept in some other format or media?

- a. No. The Copy of Record for a public record only needs to be kept for the retention period found on the appropriate retention schedule. Make sure to review your office-specific retention schedule, the Local Health Dept. (HD), and the County/Local General (GEN) retention schedule for the retention period information.
 - i. Retention periods that say, "DESTROY after..." mean that those records are non-permanent. Non-permanent records can be destroyed, regardless of their format or media once they meet the required retention period. To destroy those records, fill out the <u>SF 44905 (Notice of Destruction)</u> form.
 - ii. If the retention period says PERMANENT or CRITICAL, there is different retention guidance; see the County/Local Records Custodian Handbook.

2. Do we only need to permanently destroy paper records?

- a. "DESTROY" means that you *may* permanently destroy all versions, no matter what format, unless specific retention instructions for different copies are provided in the record series.
- b. It is best practice to destroy non-permanent records when they reach their disposition date, but this is not mandatory. If you wish to keep a copy longer for business or reference purposes, that decision is yours.
 - i. Just be aware that while you possess that copy, it is still your Copy of Record, and you're responsible for *producing* it if you receive a public records request or subpoena for it, even if it's past the date when the records became eligible for destruction.

Records Classification Questions

- 1. If a patient from one of the clinics completes a check-in form, consent form, HIPAA form, or health history form, can we scan the handwritten records into our Electronic Medical Record (EMR) later? And how long do we have to keep paper/written records?
 - a. Patient-specific medical information like check-in, consent, HIPAA, or health history forms, are covered on the Local Health Departments (HD) retention schedule under <u>Record Series # HD 23-01</u>, and have a seven (7) year retention.
 - b. They are non-permanent records, so you only need one (1) Copy of Record, in whatever format or media you like. Once scanned into the EMR, if you're using that as your Copy of Record, then the paper becomes a duplicate.
 - c. Only when you go to destroy the Copy of Record (in this case the EMR record) would you fill out the <u>SF 44905 (Notice</u> <u>of Destruction)</u> form.
- 2. When our patient's check-in at the clinic, we have some checklists for what vaccinations are needed that we create for the nurse to know what vaccines to draw up for each child. When the child is checked in, we look at their existing CHIRP (vaccine registry) record to see what they are due for that day. We complete our checklist form with name, DOB (for verification with parent once in room that we have correct child and correct record), and then check off which vaccines are needed. After that visit, we shred that form because we entered the vaccinations into CHIRP to show what we gave the child that day. Are we to keep that form?
 - a. Yes, that form and any other records used for entering information into CHIRP are covered under <u>Record Series # HD</u> <u>23-03</u> and do have to be retained. However, they are non-permanent records.
 - i. For records entered into CHIRP, you should keep your own copy for seven (7) years after entry, then destroy.
 - ii. Any related records not entered into CHIRP may be destroyed after ten (10) years.
 - iii. Both situations require filling out the <u>SF 44905 (Notice of Destruction)</u> form.

3. Our office has various COVID 19 correspondences, forms, receipts, and emails. How do I classify these records?

- a. COVID-related records would fall under the two Communicable Disease record series on the Local Health Departments retention schedule:
 - i. Record Series # HD 23-05 (Investigation and Treatment)
 - ii. Record Series # HD 23-06 (Prevention, Screening, and Compliance)
 - iii. The retention for both is 7 years, and you can keep the records for that time in any format you prefer.

4. How long do I keep birth certificates?

- a. If the birth information is in your local system, you can destroy any originals as soon as the electronic information has been verified against them. Any printouts you create *from* the system are duplicates and you can destroy those at any time, no form needed.
- b. If you have birth certificates whose information has *not* been entered into your local system, the original records must be retained permanently under <u>Record Series # HD 23-17.</u>
 - i. regardless of their date, despite the 1907 in the title
 - ii. unless you choose to enter that older information into your system, in which case, see (a).
- c. Home Birth Packets (the form that provides the certificate information for non-hospital births) are a permanent record under <u>Record Series # HD 23-13</u>. You don't, however, have to keep them permanently in hard copy; see (a).

State Form 44905: Notice of Destruction (NOD)

- 1. Is the NOD (SF 44905/Notice of Destruction) meant to be signed by the person who supervises the destruction?
 - a. Yes. Whoever witnesses the destruction should sign the NOD. If you have more questions on the NOD form, see IARA's contact information on the top right corner of the form.

Retention Questions

- What category and timeframe would food inspection reports have fallen under for the general retention schedule? Would it be GEN 10-04 (or GEN 20-04)? Under the new schedule, periodic inspection reports would fall under HD 23-09, correct?
 - a. Food inspection reports were not listed on the County/Local General (GEN) retention schedule. They were considered nonscheduled records until the Local Health Departments (HD) retention schedule was created in 2023. Because it was a nonscheduled record, the Local Health Dept. would have filled out a PR-1 form to destroy or transfer those records.
 - b. Now, food inspection reports are covered under <u>Record Series # HD 23-09</u>.

2. Packing slips of the vaccine that we receive. Would we keep those 3 years?

- a. No, use <u>Record Series # GEN 23-04</u> on the County/Local General (GEN) retention schedule. The retention period is "DESTROY two (2) years after the month of mailing." Fill out the SF44905/Notice of Destruction form to destroy those records.
- 3. We make up our own worksheets to verify lot numbers of vaccines with the front office staff so that everyone is on the same page. Do we need to keep for any period?
 - a. Yes, keep for three (3) years; use <u>Record Series # GEN 10-04</u> on the County/Local General (GEN) retention schedule. The retention period is "DESTROY after three (3) years." Fill out the <u>SF 44905 (Notice of Destruction)</u> form to destroy those records.

- 4. If the new retention schedule says we are to keep records for a certain period but we've only been keeping that record for a shorter period or not at all, what will happen to us? Is there a fine?
 - a. No, there is no fine, only a stated requirement in the law (<u>IC 5-15-6-8</u>). Like all other county/local offices, you have a legal responsibility to keep public records according to state and federal laws. The retention schedules are set by those laws, so you should follow them moving forward, which will help you maintain compliance and a good records management program.

For records that are PERMANENT or CRITICAL, it is best practice to maintain two copies, at least one of which is physical, and microfilm continues to be an industry standard. But as of October, IARA will no longer require that CRITICAL records be microfilmed. This is part of an effort to modernize and streamline our records management advice.

- 5. In our environmental programs, we do permits, inspections, plan review, issue fines, issue orders and such in paper form and some directly into a database/electronic platform. For the things we do in written form, we scan them into the electronic platform and then we shred the original after the upload that day. Is that allowed? We didn't know we had to keep the original record since we scanned it into our system. (Examples of forms are inspection forms with violations observed and corrections required, along with signatures of the inspector and the establishment operator.)
 - a. It depends on the retention of that record series. Review the retention schedules for the record's retention period.
 - i. If the record series isn't marked PERMANENT or CRITICAL, then yes, once you verify the electronic record for legibility and completeness against the paper record's information and content, you can destroy the paper record. Only one (1) Copy of Record is required for non-permanent records, in whatever format you prefer. When you designate that Copy of Record, any additional versions (including the original if you've chosen another format) become non-record duplicates. Those can be destroyed whenever you no longer need them, no Notice of Destruction required.
 - ii. For records that are marked PERMANENT, you also only need to keep one (1) Copy of Record.
 - 1) The best practice for permanent and long-term records is a physical (paper or microfilm) Copy of Record, with any electronic versions considered a reference/access duplicate.
 - 2) If, however, you are confident that your electronic system meets the specifications in IARA's <u>Electronic</u> <u>Records Guidelines</u> and OCPR Policies <u>20-01</u> and <u>20-02</u> and have chosen to designate the electronic version as the Copy of Record, then yes, any other versions may be destroyed whenever, no form needed.
 - iii. For records that are marked CRITICAL, at least two (2) Copies of Record should exist, preferably in separate locations.
 - 1) The best practice for critical records is at least one (1) physical (paper or microfilm) Copy of Record, with the second Copy of Record in any format of your choice.
 - 2) If, however, you are confident that your electronic system meets the guidelines in IARA's <u>Electronic Records</u> <u>Guidelines</u> and OCPR Policies <u>20-01</u> and <u>20-02</u>, and you have chosen to keep both Copies of Record in electronic format, then yes, any other formats may be destroyed.

6. In our onsite sewage program, we do a hand drawing of the property when doing onsite inspections. The drawing is a sketch of where the home is, other building is, the driveway, the pools, a fence, and all things on the property – and then we draw in where the septic system is installed and all components of it (perimeter drain, the outlets, the wells, etc.). That form is put in the file for that property since we don't have an electronic inspection or permitting system. When people who purchase the property in the future come in for public records requests for the files on the system at the property from 40 years back, we have them as there is no other way to know where things are on the property since it's all underground.

If the NEW retention rule says we can shred a document in 3 or 7 years...how are those records available for property buyers for many years to come? And will all environmental records be required to be kept for the same amount of time? To us, the property records we inspect (commercial or residential) are all equal. What will the retention rule say?

- a. You can now review the Local Health Departments (HD) retention schedule for the answers!
 - i. If the records are non-permanent (meaning the retention period says, "DESTROY after..."), that is the *minimum* time you are required to keep it in your office. It is your choice if you wish to keep records longer than that for business or reference purposes.
 - ii. If the retention period says PERMANENT or CRITICAL, there is different guidance for those records. See the IARA website and the County/Local Records Custodian Handbook for more information.
- 7. We never knew there was a requirement for how long we kept any of our records. We keep them if we feel we need them, and then we've shredded several boxes of records yearly for space reasons. What various retention rules apply to us? What about our Board Meeting minutes, vital records applications or court orders or paternity forms, home testing records for lead paint sampling, developmental assessment forms we complete for children in their homes due to lead poisoning, etc.? How do we know what applies to what? Is there more than one retention rule? Is there training for new staff on records retention? If we send letters to people, how long must we retain that letter?
 - a. As a government agency, your office is required to keep records according to the retention schedules set out by IARA, which follow state and federal laws on retention, and include different retention requirements for many different types of records.
 - b. For Local Health Departments, you have two (2) main retention schedules to follow: the <u>Local Health Departments</u> (HD) schedule and the <u>County/Local General (GEN)</u> schedule. Both schedules can be found on the IARA website.
 - i. The HD is a brand-new office-specific retention schedule that was recently approved in May 2023. Most of the items listed above will fall under the Record Series on the HD schedule. If you have difficulty finding a record series that seems to cover the records you have, contact cty@iara.in.gov for assistance.
 - ii. The GEN contains those record types common enough that most government agencies produce them, and the retention requirement on each type is the same for everyone.
 - 1) Board meeting minutes, for example, are a record everyone produces, so they're on the GEN. (GEN 10-01.)
 - 2) Correspondence (letters, emails, phone messages, texts) is a *format* for records, rather than a record series.
 - a) The subject of the communication determines what record series covers it, rather than the fact that it's a letter or an email.
 - b) However, *most* correspondence that isn't tied to a specific case or program will fall under one of two Record Series that are also on the GEN schedule: <u>GEN 10-03</u> (Policy Files) or <u>GEN 10-04</u> (General Files).
 - c. IARA is happy to provide records and information management training on request, and consultation at any time on specific questions you may have. However, we lack the staff to train every new county/local employee as they come aboard, so we encourage those who *have* been trained to:
 - i. share that information with new colleagues.
 - ii. keep good documentation of how it's been applied to your office's internal records procedures.

- 8. My inspectors hand writes letters for me to type into the computer to then print and mail for the inspector. We don't have everyone using computers in all areas. Do I have to keep the handwritten letter they gave me to type or just the final letter I print from my computer and send to the property owner?
 - a. If everything in the handwritten letter goes into the final version, then the original notes are duplicates and can be discarded. Unless you prefer it for your filing system, you also do not need to keep a *paper* copy of the final letter; the electronic copy can fulfill your retention requirements.

9. Why do we have to keep the paper record if we've scanned it into our EMR and can pull it up?

- a. The answer to this question depends on the type of record it is, and the retention requirements listed in the appropriate retention schedule. However, in most cases:
 - i. You don't have to keep the "original" record, just a Copy of Record that includes all the information that was on the original.
 - ii. If all information from the paper record goes into the EMR, then the EMR record can become the Copy of Record, and you can destroy any duplicates – including the paper – as non-record material. No Notice of Destruction required.
 - iii. If *not* all information from the paper record is entered into the EMR, then the version in the EMR cannot be your Copy of Record. You would need to either:
 - 1) keep the paper copy OR
 - 2) convert it to another format that *does* include all the information and make that your Copy of Record.

10. What if we have all records electronically, but our system becomes obsolete or is hit by a phishing attack or malware? What if we lose all records that way?

a. IARA's Electronic Records Program can advise you on what to do in this situation or help you reduce the likelihood of this scenario happening to your office.

For permanent and critical records, it is not best practice to store them forever in only an electronic format. It is always a risk to go electronic-only with long-term records; however, we understand that physical storage can be a challenge, and more and more government offices are wanting to use this option. So, IARA recommends that staff make a defensible decision by reviewing:

- i. Oversight Committee on Public Records Policy 20-01: Retention and Disposition
- ii. Oversight Committee on Public Records Policy 20-02: Electronic Records Technical Standards
- iii. <u>IARA Electronic Record Guidelines</u> (This is where you will find imaging standards and quality control recommendations.)
- iv. The <u>Recommended Capabilities for Electronic Recordkeeping Systems</u> checklist (This can help people assess their electronic information systems.)

Please be aware that the policies and the checklist cited above will undergo revision at the end of this month so look for communication regarding those changes.

- 11. When we talk with patients on the phone for an infectious disease outbreak, we print the forms with the questions we need to ask (some are long forms like 15+ pages) and then we jot down their answers as we talk with them. Then we enter those answers into NBS (which is the state disease database). We were told we must keep the printed forms we completed by hand while on the phone because they are the original record. Is that true?
 - a. You do have to keep your own copy of the information on the form, but not because it's the original record -because it's *your* record. Since the State owns NBS, the information you entered there is their copy of the record. You need to have your own copy.
 - b. However, these records are covered under <u>Record Series # HD 23-05</u>, which only has a seven (7) year retention.
 - c. You don't have to keep the record in *printed* format for those 7 years. You are welcome to digitize it.

- 12. When we have a drive-thru vaccination clinic (like the huge ones we did during COVID where they go for months), we give patients clipboards in their car to complete and then we enter only certain fields of that form into CHIRP (vaccination registry) later that week. We were always told we had to keep those forms for 7 years because they contain additional information we don't enter into CHIRP (like health history, consents, answers to questions about allergies, etc.). Can you confirm that's still true?
 - a. Yes, that is still true. Vaccination information is covered under <u>Record Series # HD 23-03</u>, which is a non-permanent record, meaning you can keep the record in whatever format or media you want to for the full retention period. The retention on HD 23-03 is 10 years (longer than the average 7 years for most patient records) to match how long the Indiana Department of Health keeps them in CHIRP.
- 13. After our food inspections, our electronic system automatically sends an email to the facility operator from our tablet at the site since we capture their signature electronically now and to get them a copy of the inspection, it's emailed to them. How long do we have to retain that email?
 - a. Food inspections are covered under <u>Record Series # HD 23-09</u>.
 - b. Email is not a type of record but a format or medium. A record is the content or type of information within the email.
 - c. What is the content of the email?
 - i. If the email includes the inspection and it's the Copy of Record for the inspection, meaning the only record you have, you will need to keep the email record for the full retention period, six (6) years.
 - ii. If the email includes a duplicate of the inspection and you house your Copy of Record somewhere else, then the inspection is a duplicate (and the rest of the email itself is a form letter that's not a unique record on its own), so it can be destroyed at any time, no form needed.
- 14. We take a lot of notes on a notepad when citizens call to place complaints about their neighbors' homes, or bed bugs, or the hotel they stayed at, or the mosquitoes from their neighbor's standing water in their yard, or sewage in our yard from a broken pipe, or a foodborne outbreak, etc. We don't keep those notes once the notepad is full. Is that OK?
 - a. If the information from the notes goes into an investigation file or other record, then the notes themselves are non-record materials and don't have to be kept at all.
- 15. We issue handwritten receipts when we take in money and give a copy to the citizen. Later that week, we enter the permit application information into our electronic system and the second receipt is printed from that system for the daily recordkeeping processes and balancing for money taken in that day/week. Do we have to keep both receipts? How long?
 - a. Receipts are covered under <u>Record Series # GEN 10-10</u> or <u>GEN 10-11</u> (depending on whether it's a receipt you issued to someone else, or a receipt for something you bought), and they have a ten (10) year retention. They are non-permanent records, which means you only need to keep one (1) Copy of Record, in any format or media you choose.
 - b. If all the information from the handwritten receipt is transferred into the system, then the handwritten receipt would become a duplicate and may be destroyed as soon as you no longer need it.
 - c. You only need to keep the *information*, so it's your choice whether to keep the printed copy, or to designate the electronic version as your Copy of Record and destroy the printed receipt when you no longer need it as well.
- 16. Are County Board of Health Meeting Minutes considered Permanent and Critical? And would those same records be a part of the Record Series <u>GEN 10-01</u>?

a. Yes.

Miscellaneous Questions

- 1. In general, if a new person finds something wasn't done (i.e., a NOD not filed), should it be done retroactively?
 - a. If you can document what they destroyed, fill out an <u>NOD form</u> retroactively and then focus on moving forward in compliance.
- 2. I looked at the updated (May 2023) Retention Schedule and it references IC 34-11-2-6 for Food Service Permitting Records are based on. When I google IC 34-11-2-6, the search results refer to "Sheriffs or public officers; actions growing out of liability incurred during official acts or omissions of duty." Is there a better way than just an online search?
 - a. Public officers mean any government employee, like a records custodian who manages records in their county/local office, not meaning a police officer (although police can also be records custodians in their sheriff's office).
- 3. What is a permanent record? What if we have a written or typed version and we have a scanned version in a database? Which one do we have to keep? What if we don't have the ability or funds to put things on microfiche/film? Who does that? Where do we keep those things?
 - a. A permanent record must be maintained permanently for historical or other long-term purposes. You can find out if a record is permanent by reviewing the retention schedules and looking at the retention period for the record series. For more information on permanent records, please review the <u>County/Local Records Custodian Handbook</u> on IARA's website or email <u>cty@iara.in.gov</u>.
 - b. For records that are marked PERMANENT, you only need to keep one (1) Copy of Record.
 - i. The best practice for permanent and long-term records is a physical (paper or microfilm) Copy of Record, with any electronic versions considered a reference/access duplicate.
 - ii. If, however, you are confident that your electronic system meets the specifications in IARA's <u>Electronic Records</u> <u>Guidelines</u> and OCPR Policies <u>20-01</u> and <u>20-02</u> and have chosen to designate the electronic version as the Copy of Record, then yes, any other versions may be destroyed.
 - c. For records that are marked CRITICAL, at least two (2) Copies of Record should exist, preferably in separate locations.
 - i. The best practice for critical records is at least one (1) physical (paper or microfilm) Copy of Record, with the second Copy of Record in any format of your choice.
 - ii. If, however, you are confident that your electronic system meets the guidelines in IARA's <u>Electronic Records</u> <u>Guidelines</u> and OCPR Policies <u>20-01</u> and <u>20-02</u>, and you have chosen to keep both Copies of Record in electronic format, then yes, any other formats may be destroyed.
- 4. We have a lot of older records that were scanned and kept on fiche/film. But our reader broke years ago and we cannot find anyone who can service it anymore. They say it is not fixable. We cannot buy one and are having trouble finding one to buy anyway. How do we read those?
 - a. IARA's Imaging and Microfilm Services Laboratory (SIML) or a vendor can create digital access copies of your fiche/film for you to use electronically. Then you could store the fiche/film as the master reels for long-term preservation. You can also consult other county/local offices in your county to see who has a working microfilm reader; most likely the county clerk, recorder, or public library will have one.
- 5. If we have records that are considered permanent records, and we keep them in boxes as paper forms or if we choose to put them on fiche/film, what happens if our office floods like it did last spring when we lost several boxes of records from the past. What about a fire? Is there an obligation to store them in some water/fireproof manner? If we lost records, but we don't exactly know what we lost, are we in trouble?
 - a. If you create microfilm of your permanent records, you can create 2 reels, a master, and an access copy. The master should be housed off-site (for example in a bank vault or with a vendor who specializes in film storage), the access copy can be stored at your office. Or you can create one reel that acts as your master copy, and then a digital copy (film can be converted to digital files) that acts as your access copy. If your records become severely damaged, please contact IARA's Records Management division immediately.

6. How do we know what is the "original record"? Do you know if there is a definition of that?

- a. There is no official definition of an original record, nor any special value to that designation; instead, we look at "Copy of Record" and duplicates.
- b. The Copy of Record is the copy you are currently using to fulfill records retention requirements. It does not need to be the first version of that record ever created; formats or media can change over time if you re-assign the designation to a different copy. See page 1 of this FAQ and Section 2.3 on the <u>County/Local Records Custodian</u> <u>Handbook</u> for more information on Copy of Record.
- c. Duplicates are any copies (which can include the "original") that are *not* the Copy of Record. Duplicates are considered non-record material and may be destroyed when no longer useful, no Notice of Destruction required.
- 7. IDEM sends all inspection, enforcement, and written orders to Local Health Departments for all commercial entities in our county. They indicate in the emails and copies in US mail sometimes to us that we are to keep these records for public viewing in our county when requested. How long do we have to keep their records? They are vast and many! Because they mostly email them now, we print them and try to keep a file. But we are wondering if those are our records, or just copies of theirs and if theirs is there a timeline we must keep them or just if we have space to do so?
 - a. These are copies of IDEM records that you are posting at their request. Contact IDEM to find out how long they want the orders displayed. Once that period is over, they can be destroyed as non-record material, no form needed.
- 8. When we are ready to destroy records, the records are also scanned into a cloud-based storage. If we have received permission to destroy records, do we also destroy the scanned documents or are we to keep the scanned documents forever?
 - a. Yes, destroying means you are destroying every single copy of that record in existence, no matter the format or media. So, if you got permission to destroy a record and you have it on paper, in an electronic file, and then in the cloud, you should delete/destroy ALL copies.

Questions from the September 15, 2023 Training

- 1. Regarding claims that we send to the Auditor do we need to keep duplicates of the claims we submitted for payment to the Auditor?
 - a. Use GEN 10-10 for financial records or GEN 10-11 if revenue records. If it is both, use GEN 10-10 because it is the longer of the two retentions.

2. If we are cc'd on a letter by IDEM, do we need to maintain a copy of that letter?

- a. As long as IDEM is sending you the letter just for reference purposes, you can treat this as a non-record or a duplicate and do not need a Notice of Destruction to destroy it. The letter was created by IDEM and would be their record.
- 3. Do we need to get County Commission on Public Records (CCPR) or IARA approval on NODs?
 - a. No, you no longer need to seek approval from CCPR or IARA for the NOD. If you want IARA to double check your filled out NOD, you can send it to cty@iara.in.gov. Otherwise, you can just send a copy to the CCPR. They will add it to their minutes, and you will maintain your own copy in your office in accordance with GEN 20-01.
- 4. What do we do if a past employee never had records for a septic system and the public wants them?
 - a. If you can't retrieve the records, then document the request you have received and let the requestor know you are unable to fulfill the request.
- 5. If records are maintained in NBS, do they also have to be maintained in a separate manner such as EMR or paper copy by the LHD's?

- a. If you have a record, you submit or upload to NBS then that is your copy, and you need to retain it accordingly. If you are just typing information into a system, then you don't have a record and the owner of the database is responsible for the data you entered.
- 6. If permanent Birth and Death records are in the State Drive system, do we have to scan and keep a copy too?
 - a. This touches on the difference between entering a record/scan of a record into a system owned by someone else, vs entering data into a system owned by someone else. If you are entering a record into DRIVE and that record has more info on it than what you enter into DRIVE, IARA recommends maintaining a copy of that record in your office. If you are just entering data, then this would fall under IDOH Vital Records record series 2023-01: Live Birth Data, which covers DRIVE (or any subsequent systems that IDOH Vital Records may use in order to maintain birth and death data from the counties).

7. Can you talk about when/how the State Board of Accounts Audit Report is received?

- a. See this link: https://content.govdelivery.com/accounts/INARA/bulletins/2c3081c
- 8. One point of emphasis: Before destroying non-permanent records, be sure to get your IT department (and any outsourced scanning provider) to sign off on IARA's Electronic Records Guidelines and Checklist. Keep that as retrievable documentation in case retrieval problems develop, right?
 - a. The best thing to do for born digital or scanned paper is to make sure you talk to your IT people and are confident that the electronic system can both support your records and then also that the records can be permanently deleted.
- 9. For original timesheets, payroll and the employee service record are these permanent?
 - a. Most payroll records fall under GEN 10-11. Some payroll records are permanent though. For example, in GEN 10-16 there are three specific forms 99-A, 99-B, 99-C (or their equivalents) and these are permanent.
- 10. What about separation letters for example, when they signoff that they are leaving, and they are paid off so much?
 - a. This is GEN 10-27 which has been updated this year to have a 10-year retention. You do need to keep some personnel information permanently, so please see GEN 20-02.
- 11. Was the question regarding sewer connection related to environmental health or special districts? (Special district no longer required?)
 - a. All these records are now on the General schedule.
- 12. Is there anything we need to do if records exist that we know are inaccurate? For example septic records we know that the math to configure how the system was installed was inaccurate, or permits were issued for lots that weren't big enough. So, we can say yes, we have this on file, but this is incorrect. How should we fix this?
 - a. If you have a significant number of incorrect records, it is a best practice to develop a policy that covers how to respond to requests, what documentation to maintain, and how to address any concerns the requestor may raise.

13. How do we know when the HD retention schedule is updated?

a. IARA is putting retention schedules on a 5-year rotation to ensure they are updated regularly. It doesn't mean we can't update it sooner, but every 5 years we have it on our calendars to form a task force to work on revisions. You will know when the updates, if any, have happened if you subscribe to the

monthly chats or bulletin (email <u>cty@iara.in.gov</u> if you wish to subscribe). Each updated schedule will also have information explaining any changes made and all retention schedules will have the date last updated on the cover sheet. To ensure you have the most up to date version you can always email <u>cty@iara.in.gov</u>.