

OGDENSBURG CITY SCHOOL DISTRICT  
OGDENSBURG, NEW YORK

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**SUBJECT:** First Review of Revised Board of Education Policy/Regulation  
#5670: Records Management

**DATE:** January 19, 2021

**REASON FOR BOARD CONSIDERATION:**

The Board of Education must review and approve all policies and regulations of the Ogdensburg City School District.

**FACTS AND ANALYSIS:**

The Superintendent will designate a Records Management Officer, subject to Board approval, to develop and coordinate the District's orderly and efficient records management program. Among other aspects, this program includes the legal disposition or destruction of obsolete records and the storage and management of inactive records. The Records Management Officer will work with other District officials to develop and maintain this program.

**RECOMMENDED ACTION:**

No action necessary – First Review of Revised Board of Education Policy/Regulation #5670: Records Management

**APPROVED FOR PRESENTATION TO THE BOARD:**

  
\_\_\_\_\_  
Superintendent

KK/alf  
Attachment

# POLICY

2020

5670

Non-Instructional/Business  
Operations

## **SUBJECT: RECORDS MANAGEMENT**

The Superintendent will designate a Records Management Officer, subject to Board approval, to develop and coordinate the District's orderly and efficient records management program. Among other aspects, this program includes the legal disposition or destruction of obsolete records and the storage and management of inactive records. The Records Management Officer will work with other District officials to develop and maintain this program.

The District may create a Records Advisory Board to assist in establishing and supporting the records management program. Members of this board may include the District's legal counsel, the fiscal officer, and the Superintendent or designee, among others.

### **Retention and Disposition of Records**

The District will retain records and dispose of them in accordance with the Retention and Disposition Schedule for New York Local Government Records (LGS-1) or as otherwise approved by the Commissioner of Education. Further, if any law specifically provides a retention period longer than that established by this schedule, the retention period established by the law will govern.

### **Replacing Original Records with Microforms or Electronic Images**

The District will follow procedures prescribed by the Commissioner of Education to ensure accessibility for the life of any microform or electronic records that replace paper originals or micrographic copies.

### **Retention and Preservation of Electronic Records**

The District will ensure that records retention requirements are incorporated into any program, plan, or process for design, redesign, or substantial enhancement of an information system that stores electronic records. The District will also ensure that electronic records are not rendered unusable because of changing technology before their retention and preservation requirements expire.

Arts and Cultural Affairs Law Article 57-a  
8 NYCRR Part 185

Adoption Date

Non-Instructional/Business  
Operations**SUBJECT: RECORDS MANAGEMENT**

The Superintendent will designate a Records Management Officer, subject to Board approval, to develop and coordinate the District's orderly and efficient records management program. Among other aspects, this program includes the legal disposition or destruction of obsolete records and the storage and management of inactive records. The Records Management Officer will work with other District officials to develop and maintain this program.

The District may create a Records Advisory Board to assist in establishing and supporting the records management program. Members of this board may include the District's legal counsel, the fiscal officer, and the Superintendent or designee, *among others*.

**Retention and Disposition of Records**

~~The Superintendent~~ The District will retain records ~~for such a period~~ and dispose of them in ~~the manner described in~~ accordance with the ~~Records~~ Retention and Disposition Schedule ~~ED-1~~ for New York Local Government Records (LGS-1) or as otherwise approved by the Commissioner of Education. Further, if any law specifically provides a retention period longer than that established by this schedule, the retention period established by the law will govern.

**Replacing Original Records with Microforms or Electronic Images**

The District will follow procedures prescribed by the Commissioner of Education to ensure accessibility for the life of any microform or electronic records that replace paper originals or micrographic copies.

**Retention and Preservation of Electronic Records**

The District will ensure that records retention requirements are incorporated into any program, plan, or process for design, redesign, or substantial enhancement of an information system that stores electronic records. The District will also ensure that electronic records are not rendered unusable because of changing technology before their retention and preservation requirements expire.

Arts and Cultural Affairs Law ~~§ 57.19~~ Article 57-a  
8 NYCRR Part 185

Adoption Date

# POLICY

2003

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Non-Instructional/Business  
Operations

## SUBJECT: RECORDS MANAGEMENT

A records management officer shall be designated by the Superintendent, subject to the approval of the Board of Education. Such records management officer shall coordinate the development of and oversee a program for the orderly and efficient management of records, including the legal disposition or destruction of obsolete records, and be given the authority and responsibility to work with other local officials at all levels in the development and maintenance of the records management program.

In addition, a Records Advisory Board may be created to assist in establishing and supporting the records management program. The District's legal counsel, the fiscal officer, and the Superintendent/designee may comprise the Advisory Board.

Appropriate regulations and procedures shall be developed.

### Retention and Disposition of Records

The Superintendent shall retain records for such a period and dispose of them in the manner described in Records Retention and Disposition Schedule ED-1, established pursuant to Part 185, Title VIII of the Official Compilation of Codes, Rules and Regulations of the State of New York and Article 57-A of the Arts and Cultural Affairs Law.

8 New York Code of Rules and Regulations  
(NYCRR) Section 185  
Local Government Records Act of 1987

Adopted: 8/18/03

# REGULATION

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Non-Instructional/Business  
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## **SUBJECT: RECORDS MANAGEMENT**

### **Records Management Program**

The District's records management program is an ongoing, coordinated, administrative effort to systematically manage its records from initial creation to final disposition. This program may include procedures and details regarding how to: legally dispose of obsolete records; identify, administer, and ensure access to records of enduring value; file and index information; use technology to create, manipulate, or store information; store and manage inactive records that are no longer needed for the District's day-to-day business; store and retain records on microform, electronically, or otherwise; oversee the creation and use of forms, correspondence, and other records; work with third parties to protect, preserve, or store records; and protect vital records.

### **Designation of Records Management Officer (RMO)**

The Superintendent will initially designate a District employee to be the RMO. The Board will approve and appoint the RMO. If the RMO position becomes vacant, the District will designate a new RMO within 60 days. Within one month of any designation, the Board will notify the Commissioner of Education of the RMO's name, title or position in the District, and contact information.

### **Records Management Officer Duties**

The RMO will develop, coordinate, and promote the District's records management program in consultation and cooperation with other District officials. The RMO's duties include, but are not limited to:

- 1) Recommending and guiding the development and application of records management practices for District employees;
- 2) Coordinating the continuous disposition of obsolete records in accordance with legal requirements and the District's records retention and disposition schedule;
- 3) Recommending appropriate retention periods for any records not covered by the records retention and disposition schedule to the Commissioner of Education;
- 4) Coordinating the storage and management of inactive records, those no longer needed for the conduct of the District's day-to-day business;
- 5) Reviewing and providing recommendations on requests for records-storage equipment;
- 6) Participating in the development of, reviewing proposals for, or coordinating any micrographic or electronic information systems used to retain or preserve records; and
- 7) Organizing or coordinating a program for identifying, administering, and using records of enduring value.

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## **SUBJECT: RECORDS MANAGEMENT (Cont'd.)**

### **Retention and Record Disposition**

The District will retain records and dispose of them in accordance with the Retention and Disposition Schedule for New York Local Government Records (LGS-1) or as otherwise approved by the Commissioner of Education. If any law specifically provides a retention period longer than that established by this schedule, the retention period established by the law will govern.

Records not listed on this schedule will not be disposed of without the Commissioner of Education's approval. Further, records whose retention periods have not expired that have been damaged by natural or manmade disaster, to the extent that the information contained in them is substantially destroyed or obliterated or constitute a human health or safety risk, also require the Commissioner of Education's prior approval before disposition.

### **Replacing Original Records with Microforms or Electronic Images**

The District will follow the Commissioner's regulations for replacing original records with microforms or electronic images. This includes ensuring that when a microform will replace an original record, the microform meets established resolution and density standards to ensure that the film and copies made from it will be clear and legible and that the film will be viable in the long-term.

### **Retention and Preservation of Electronic Records**

- 1) The District will ensure that records retention requirements are incorporated into any program, plan, or process for design, redesign, or substantial enhancement of an information system that stores electronic records.
- 2) The District will ensure that electronic records are not rendered unusable because of changing technology before their retention and preservation requirements expire. In the case of archival electronic records, the District, in consultation with the State Archives, must determine that the records will remain usable and accessible by ensuring that the records are retained in currently available file formats and by creating adequate documentation of the records and their systems as defined in the Commissioner of Education's regulations.
- 3) The District will develop and maintain up-to-date documentation about all permanent or archival electronic records sufficient to:
  - a. Specify all technical characteristics necessary for reading and processing the records;
  - b. Identify all defined inputs and outputs from the system;
  - c. Define the contents of the files and records;
  - d. Determine restrictions on access and use;

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## **SUBJECT: RECORDS MANAGEMENT (Cont'd.)**

- e. Understand the purposes and functions of the system;
  - f. Describe update cycles or conditions and rules for adding information to the system, changing information in the system, or deleting information; and
  - g. Ensure the ongoing retention of records by the District.
- 4) The District will prepare and store in a secure off-site facility copies of archival electronic records to safeguard them against loss.
- 5) For electronic media that contain permanent or archival electronic records, the District will institute maintenance procedures to:
- a. Verify that the media are free of permanent potentially damaging errors;
  - b. Rewind under constant tension all tapes at least every two years;
  - c. Annually test a 3% statistical sample of all units of media to identify any loss of data and to discover and correct the causes of data loss;
  - d. Copy immediately onto new media any permanent or archival electronic records stored on media containing a significant number of errors or showing signs of physical degradation;
  - e. Copy all permanent or archival electronic records onto new media before the media are expected to fail and always before the media are ten years old; and
  - f. Prepare external labels to identify each media unit, the name of the organizational unit responsible for the records, and the records title.

### **Record Storage**

The District will secure the Commissioner of Education's approval before entering into a contractual agreement to store its records in facilities that it does not own or maintain.

**SUBJECT: RECORDS MANAGEMENT****Records Management Program**

The District's records management program is an ongoing, coordinated, administrative effort to systematically manage its records from initial creation to final disposition. This program may include procedures and details regarding how to: legally dispose of obsolete records; identify, administer, and ensure access to records of enduring value; file and index information; use technology to create, manipulate, or store information; store and ~~manage~~inactive records that are no longer needed for the District's day-to-day business; store and retain records on microform, electronically, or otherwise; oversee the creation and use of forms, correspondence, and other records; work with third parties to protect, preserve, or store records; and protect vital records.

**Designation of Records Management Officer (RMO)**

The Superintendent will initially designate a District employee to be the RMO. The Board will approve and appoint the RMO. If the RMO position becomes vacant, the District will designate a new RMO within 60 days. Within one month of any designation, the Board will notify the Commissioner of Education of the RMO's name, title, or position in the District, and ~~his or her~~ contact information.

**Records Management Officer Duties**

The RMO will develop, coordinate, and promote, the District's records management program, in consultation and cooperation with other District officials. ~~His or her~~ The RMO's duties ~~may~~ include, ~~but are not limited to:~~

- 1) Recommending and guiding the development and application of records management practices for District employees;
- 2) Coordinating the continuous disposition of obsolete records in accordance with legal requirements and the District's records retention and disposition schedule;
- 3) Recommending appropriate retention periods for any records not covered by the records retention and disposition schedule to the Commissioner of Education;
- 4) Coordinating the storage and management of inactive records, those no longer needed for the ~~conduct of the~~ District's ~~daily basis~~day-to-day business;
- 5) Reviewing and providing recommendations on requests for records-storage equipment;
- 6) ~~Developing~~Participating in the development of, reviewing proposals for, or coordinating any micrographic or electronic information systems used to retain or preserve records; and
- 7) Organizing or coordinating a program for identifying, administering, and using records of enduring value.

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**SUBJECT: RECORDS MANAGEMENT (Cont'd.)****Retention and Record Disposition**

~~The Superintendent~~The District will retain records and dispose of them in accordance with the ~~Records~~ Retention and Disposition Schedule ~~ED-1~~ for New York Local Government Records (LGS-1) or as otherwise approved by the Commissioner of Education. If any law specifically provides a retention period longer than that established by this schedule, the retention period established by the law will govern.

Records not listed on this schedule will not be disposed of without the Commissioner of Education's approval. Further, records whose retention periods have not expired that have been damaged by natural or manmade disaster, to the extent that the information contained in them is substantially destroyed or obliterated, or constitute a human health or safety risk, also require the Commissioner's of Education's prior approval before disposition.

**Replacing Original Records with Microforms or Electronic Images**

The District will follow the Commissioner's regulations for replacing original records with microforms or electronic images; ~~storing or preserving records to ensure long term viability, legibility, and legal authenticity and admissibility throughout the retention period; and inspecting microforms or images before destroying original records.~~ This includes ensuring that when a microform will replace an original record, the microform meets established resolution and density standards to ensure that the film and copies made from it will be clear and legible and that the film will be viable in the long-term.

**Retention and Preservation of Electronic Records**

- 1) The District will ensure that records -retention requirements are incorporated into any program, plan, or process for design, redesign, or substantial enhancement of an information system that stores electronic records.
- 2) The District will ensure that electronic records are not rendered unusable because of changing technology before their retention and preservation requirements expire. In the case of archival electronic records, the District, in consultation with the State Archives, must determine that the records will remain usable and accessible by ensuring that the records are retained in currently available file formats and by creating adequate documentation of the records and their systems as defined in ~~subdivision (3) of this section~~the Commissioner of Education's regulations.
- 3) The District will develop and maintain up-to-date documentation about all permanent or archival electronic records sufficient to:
  - a. Specify all technical characteristics necessary for reading and processing the records;
  - b. Identify all defined inputs and outputs from the system;

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**SUBJECT: RECORDS MANAGEMENT (Cont'd.)**

- c. Define the contents of the files and records;
  - d. Determine restrictions on access and use;
  - e. Understand the purposes and functions of the system;
  - f. Describe update cycles or conditions and rules for adding information to the system, changing information in the system, or deleting information; and
  - g. Ensure the ongoing retention of records by the District.
- 4) The District will prepare and store in a secure off-site facility copies of archival electronic records to safeguard them against loss.
- 5) For electronic media that contain permanent or archival electronic records, the District will institute maintenance procedures to:
- a. Verify that the media are free of permanent potentially damaging errors;
  - b. Rewind ~~all tapes~~ under constant tension all tapes at least every two years;
  - c. Annually test a 3% statistical sample of all units of media to identify any loss of data and to discover and correct the causes of data loss;
  - d. Copy immediately onto new media any permanent or archival electronic records stored on media containing a significant number of errors or showing signs of physical degradation;
  - e. Copy all permanent or archival electronic records onto new media before the media are expected to fail and always before the media are ten years old; and
  - f. Prepare external labels to identify each media unit, the name of the organizational unit responsible for the records, and the records title.

**Record Storage**

The District will secure the Commissioner's of Education's approval before entering into a contractual agreement to store its records in facilities that it does not own or maintain.

**SUBJECT: RECORDS MANAGEMENT****Initial Designation of Records Management Officer**

- 1) The Ogdensburg City School District shall, in writing, designate one local officer to be Records Management Officer.
- 2) The Board of Education shall notify the Commissioner of Education, in writing, of the name, title or position in the School District, mailing address and telephone number of the designated Records Management Officer within one month of such designation.

**Vacancy in the Position of Records Management Officer**

- 1) Whenever a vacancy shall occur in the position of Records Management Officer, a replacement shall be designated within sixty (60) days.
- 2) Within one (1) month of such designation, the Superintendent shall notify the Commissioner of Education, in writing, of the records management officer's name, title or position in the School District, mailing address and telephone number.

**Responsibilities of the Records Management Officer**

The Records Management Officer's job is varied and often complex. Regulations implementing the law state that "the records management officer shall initiate, coordinate and promote the systematic management of the School District's records in consultation with records custodians." Duties of the Records Management Officer according to regulations include:

- 1) Recommending and guiding the development of records management practices for local government employees;
- 2) Coordinating the continuous disposition of obsolete records in accordance with legal requirements through the adoption and use of records retention and disposition schedules;
- 3) Recommending to the Commissioner of Education suitable retention periods for any records not covered by records retention and disposition schedules;
- 4) Coordinating the storage and management of inactive records (those no longer needed for the conduct of day to day business of the School District);
- 5) Reviewing and making recommendation on requests for storage equipment;

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**SUBJECT: RECORDS MANAGEMENT (Cont'd.)**

- 6) Participating in the development of, reviewing proposals for, or coordinating any micrographics or automated data processing systems;
- 7) Organizing or coordinating a program for the identification, administration and use of records of enduring value.

**Other Activities May Include**

- 1) Surveying and analyzing existing records. Surveying records means checking storage areas and containers to determine what records exist regardless of physical format (paper, microfilm, computer tape, or disk), where they are located, what condition they are in, how old they are, and what information they contain. An analysis of these record holdings will indicate which ones are obsolete and may be disposed of; which are needed for current use; and, which have enduring legal, fiscal, administrative, or historical value and should be retained permanently.
- 2) Conferring regularly with colleagues and department heads to determine their records management needs. How long does the department or agency need a particular records series to conduct routine business? How often do staff refer to the files for information? Has the office retained files longer than applicable State Archives' Records Retention and Disposition Schedules or the local government's needs require? How do officials dispose of out-dated information? The Records Management Officer and the department heads should work together to answer these questions.
- 3) Conducting meetings when problems arise, or when the Records Management Officer has an agenda item to be reviewed by the Board. Situations may occur where the Records Management Officer will need the advice of the Board, or its assistance in gaining support for the program.
- 4) Keeping colleagues informed about records management techniques and the records management program. Workshops, manuals and other publications can provide this valuable information. The Records Management Officer may develop educational programs to present to staff and colleagues.
- 5) Consulting with New York State Archives and Records Administration (SARA) as often as necessary about any records concerns. SARA is the agency legally charged to provide advisory services to all school districts in New York State, except New York City. Professional organizations such as the Society of American Archivists (SAA), the Association of Records Managers and Administrators (ARMA), and the National Association of Government Archivists and Records Administrators (NAGARA) may also be contacted.

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## **SUBJECT: RECORDS MANAGEMENT (Cont'd.)**

- 6) Reporting the economic advantages and the tax dollar savings which the records program provides to other government officials and the public whenever possible. Various public information tools, such as news releases, annual reports, newsletters and the news media may be used to publicize the records program.