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Connecticut State Library
Office of the Public Records Administrator
<http://ctstatelibrary.org/publicrecords/>

Public Records Official Memorandum #100

Date: June 11, 2013

To: Agency Heads and Records Management Liaison Officers (RMLOs)

From: LeAnn R. Power, CRM
Public Records Administrator 

Subject: Managing Records during Agency Relocation

This memo is intended to assist you in ensuring agency compliance with recordkeeping requirements pursuant to CGS §11-8a and §11-8b.

In any office relocation, your agency must carefully consider how it will handle its records. It is very important that your staff begins planning for transfer, relocation, and/or disposition of the records well ahead of time. Information is available on the Office of the Public Records Administrator (OPRA) website: <http://ctstatelibrary.org/publicrecords/state>.

Please be aware that pursuant to CGS §1-240(a) and §53-153, it is either a class A misdemeanor or felony to destroy, mutilate or otherwise dispose of any public record without first receiving authorization from our office.

Agency RMLOs and Assistant RMLOs serve as primary contacts regarding records management, and will play a key position in ensuring this process moves smoothly and efficiently. Please reference [Public Records Policy 07: Records Management Liaison Officer \(RMLO\) and Assistant RMLO – Appointment and Duties](#) to review these position responsibilities. Be aware of the distinction between RMLO and Assistant RMLO.

There are several steps that can make relocation more efficient from a records management standpoint:

- a. Ensure the agency has a designated RMLO, and if necessary, a sufficient number of Assistant RMLOs. To make appointments use the Records Management Liaison Officer Designation Form (Form RC-078), available in the Forms section of the [OPRA website](#).
- b. Conduct an inventory in all departments/divisions/units to determine where records are located. Remember to consider possible storage areas beyond the department's immediate physical area, e.g. attics, basements, and other out-of-the way areas. A sample records inventory form is available in the Forms section of the [OPRA website](#) for your reference.
- c. It is important for the RMLO/Assistant RMLO to make the distinction between the official record copy and duplicate copies. Official record copy means the original or official copy of a record that is retained for legal, operational, or historical purposes. For example, if records are kept in both electronic and hard copy format, the agency must identify the record copy.

- d. E-mail and electronic records must be a part of the records inventory. Although hard copies are the primary concern during the move, attention should be paid to eliminate all duplicates and non-record material, regardless of format. Agencies should only be retaining the official record copy. Reference the OPRA [General Letter 2009-2: Management and Retention of E-mail and other Electronic Messages](#) for additional guidance.
- e. Upon completion of the agency records inventory, the first step is to identify and dispose of any non-record items. Items that are non-records do not require the submission of an RC-108 Records Disposition Authorization form and can be disposed of immediately. Some examples of non-records are extra (duplicate) copies, reference materials, publications not related to agency business, and blank forms.
- f. For the remaining records, agency staff should consult the records retention schedules to determine the retention period.
 - i. There are two types of schedules. General Schedules include records commonly used and created by most agencies. Agency specific schedules list records unique to individual agencies. Records retention schedules are available online through the [OPRA website](#).
 - ii. Please note that only agency specific retention schedules created or revised after July 1, 2007 are posted online. Records retention schedules with an effective dates prior to July 1, 2007 are on file with the Office of the Public Records Administrator. Agency RMLOs should have copies of all current agency specific retention schedules. The Office of Public Records can provide RMLOs/Assistant RMLOs with copies of agency specific schedules if needed.
 - iii. Agency RMLO should determine the best method to share agency specific retention schedules not available on the Office of Public Records website. This can include scanning the paper copy and putting the schedules in a central location for access, e.g. shared network drive, SharePoint site, or intranet.
 - iv. Given the scope of the pending moves, OPRA will do its best to accommodate requests for updates and revisions of agency specific schedules. Please be aware that this means the agency may be moving records that are past their retention period. Many records on these schedules may have already been added to the general retention schedules.
- g. Obtain permission to destroy records that have met the minimum retention period by submitting a *Records Disposition Authorization* (Form RC-108), available in the Forms section of the [OPRA website](#).
 - i. If an item does not appear on a records retention schedule, consult the Public Records staff.
 - ii. If a record is part a pending action, claim, or litigation it cannot be destroyed until resolution of the issue. If available, consult agency staff attorney.
 - iii. Due to the increase in disposal requests during agency relocations, please allow for additional time for the RC-108 form to be processed. Please take this into consideration when scheduling your destruction.
- h. Develop procedures for moving active files. These procedures should include identifying the records custodian, department/division/unit, and final destination to avoid lost and missing records. Boxes should be clearly labeled and precautionary measures should be in place for the handling and transporting of restricted material. Inactive records and records authorized for destruction must be clearly segregated from each other.

- i. If the agency determines it must utilize an off-site records storage facility, vendors must be approved by the Office of the Public Records Administrator and on State contract. The list of approved vendors is available through the Department of Administrative Services.
- j. It is important to evaluate if offsite storage is a viable and cost efficient alternative for your agency.
- k. The State Records Center may be an alternative for some agencies. To determine if this is a viable solution for your agency consult [Public Records Policy 10: Transfer and Storage of Records at the State Records Center](#).
- l. For records that have a retention period of "Permanent / Archival", the agency may transfer the records to the Connecticut State Archives or an approved archival repository. All agencies should use the appropriate *Records Disposition Authorization* form, as well as the State Archives' *Memorandum of Transfer* or an equivalent form from an archival repository. For transfer to the State Archives, refer to *Transfer of Records to State Archives* and *Collection Policy for State Archives*, available at <http://ctstatelibrary.org/state-archives/>.
- m. For agency publications, consult with the [Connecticut State Library for the State Document Depository Program](#) (CGS §11-9d). If the publication does not need to be transferred to the State Library, it can be destroyed after submission of an RC-108 form.
- n. Contact OPRA with any questions regarding this memorandum at (860) 757-6540.