



Document No: \_\_\_\_\_

Effective Date: \_\_\_\_\_

**TITLE** Records and Information Management (RIM) Policy

**Organizational Level:** City

**Document Type:** Policy

**MISSION**

Our mission is to provide leadership and guidance relating to Records and Information Management (“RIM”) by establishing a Policy for the City of Commerce City. RIM achieves this by:

- Maintaining records retention and disposition schedules
- Facilitating secure, cost-effective storage for inactive records
- Facilitating the disposal of records in a timely fashion
- Identifying essential records
- Providing guidance on all aspects of records and information management

**SCOPE**

This policy applies to all City employees, officers, and appointed and elected officials. Department Directors will designate a position to hold the responsibility of Deputy Records Custodian (“DRC”) for their respective department and/or division to assist with records and information management and policy compliance.

**POLICY**

The following Records and Information Management (RIM) Policy is intended to provide guidance over the creation, organization, maintenance, use and disposition of all City records.

**OBJECTIVES AND PUPOSE**

Transparency: public information is a fundamental right of all people and should be readily and equitably accessible to all requestors, regardless of format.

Efficiency: deliberate management of records throughout their lifecycle promotes efficiency of government services.

Preservation: preservation of essential records, whether digital or physical, is crucial to the efficacy of our city.

Security: appropriately retaining, organizing, and controlling access to City information is the first line of defense against security breaches.

**Records Management** is the systematic control of records throughout their life cycle. A record will go through three stages during its life cycle:

1. *Creation or receipt* – the moment a record is produced or received in the conduct of official business
2. *Maintenance and use* – the record is active and stored for use in the course of business.
3. *Disposition* – the record is no longer active and is archived for retention or destroyed.

## **RESPONSIBILITIES**

The Deputy City Clerk is the designated Records Manager for Commerce City and works closely with Deputy Records Custodians (DRC's) to ensure that the City's RIM Policy and subsequent procedures are followed.

### **Records Manager Responsibilities:**

- Coordinate the overall records management practices of the city and maintain the Records and Information Management Program
- Serve as the Chair of the City's Records and Information Management Team
- Provide and maintain a Records Center and Electronic Records Center to house inactive records prior to disposition
- Act as a resource for departments in the management, preservation, retention and destruction of records
- Conduct a semi-annual audit and disposition of city records that have met their retention periods
- Provide records management training to designated DRC's
- Manage the City's shredding contract and coordinate the location, maintenance, and emptying of shred bins throughout
- Promote responsible records management within the city

### **Deputy Records Custodian ("DRC")**

Each City Department is asked to designate certain staff member(s) to be their Deputy Records Custodian(s) ("DRC") to ensure responsible and effective day-to-day management of their department's specific records and help maintain the department's records retention schedule.

### **DRC Responsibilities:**

- Coordinate all records management activities and functions and ensure this policy is implemented in their individual departments
- Serve as members of the City's Records and Information Management Team
- Communicate with their Department where the "official copy" of a record is being maintained and ensure all other copies and drafts are destroyed or disposed of properly

- Identify vital/essential records and ensure they are adequately protected from damage or loss
- Identify records to be archived and ensure records are boxed and labeled to indicate contents, date span of records, and destruction date before transfer to the records center
- Identify records that have met their retention to be documented on the disposition form in preparation for destruction
- Submit a [disposition form](#) on the City Clerk's SharePoint page for records that have met their retention and were destroyed. Paper and corresponding electronic records should be destroyed simultaneously

### **Individual Staff Responsibilities:**

It is the responsibility of all staff, officers, and appointed and elected officials to ensure they are creating, using, retrieving and disposing of records in accordance with the City's established policies and procedures. When there is a lawsuit, all records, including the convenience copies that individuals have retained, may be identified as discoverable and can be used against the city in litigation.

### **PUBLIC RECORDS**

**Public Records** are defined by state law as "all writings made, maintained, or kept by the City for use in the exercise of its functions or involving the receipt or expenditure of public funds." Colorado Revised Statutes 24-72-201 et seq., are known collectively as the Colorado Open Records Act "CORA". Public records, regardless of the format or medium, are open for inspection by the public at reasonable times. The City's policy governing access to public records is located on the [City's Website](#). The City Clerk's office will be responsible for all public records requests. JustFOIA is the software the city uses to process public record requests.

- Public Record requests will be submitted to the City Clerk's office via the website (JustFOIA), email or in-person. Staff that receive public records requests shall forward the request to the City Clerk's Office for processing.
- The Records Manager will assign the request to the appropriate department to respond to the request
- Department staff will provide a time estimate to the Records Manager if it will take longer than one hour to compile the responsive record(s), in order to assess a fee and deposit before we begin processing the request
- Designated department staff will identify and retrieve the responsive record(s) for the request and upload them to JustFOIA, or note if there were no records on file, within 3 business days per CORA
- The Records Manager will ensure CORA rules were met and perform redactions as required before releasing responsive record(s) to the requestor and closing the request

## ELECTRONIC RECORDS MANAGEMENT SYSTEM

The City's Electronic Records Management System, *Laserfiche*, will house the City's *inactive records* in a centralized repository for *retention*, as designated by the Records Manager and department DRC's. The City's OneDrive and SharePoint will be distinct from Laserfiche as they are intended to house *active records* utilized in the conduct of official business.

OneDrive	SharePoint	Software Programs	Laserfiche
<ul style="list-style-type: none"> <li>• Personal documents</li> <li>• Convenience copies</li> <li>• Working drafts</li> </ul>	<ul style="list-style-type: none"> <li>• Collaborative documents</li> <li>• Convenience copies</li> <li>• Department templates, forms, policies, procedures, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Active records such as permits, receipts, applications, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Inactive records</li> <li>• Permanent Records</li> </ul>

Additional software programs such as NewWorld and eTrakit may also create and store records. DRC's would include software programs in their annual audit to determine if the records held within the system have met retention. Regardless of where a record is stored, the record must be retrievable to comply with any open records requests received relating to such record.

Easy accessibility of records is an important factor in a successful records management system. A solid foundation and file structure is established by proper naming conventions and metadata for records.

**Metadata** is defined as "data about data" and has become an essential piece of records information management. Metadata *describes the characteristics of a record* in a structured way to help in the identification and retrieval of information. When saving a document into Laserfiche, the user will be prompted to fill in the metadata fields related to that document. For example, a contract may have metadata fields such as Project Name, Contractor Name, Department, and Expiration Date.

### File and Folder Naming Convention Guidelines

File names and folder structures shall be consistent and adhere to the naming conventions and structure as established by the Records Manager. File and folder structures shall be organized in a way that makes sense to the Department and any users who may be accessing them.

- Information to consider including in a file name:
  - Category/subject name or acronym

- Location
- Date
- Type of data
- Version number of file
- Do not use special characters in file names # ! \$ % & ' @ ^ ` ~ + , . ;
- Omit spaces and punctuation other than hyphen (-) and underscore (\_) or capitalize the first letter of each word for delineation. (e.g. “my\_data\_file2014” or “MyDataFile2014”)
- Use the international date standard **YYYYMMDD** so your dates and titles sort properly. (e.g. August 24, 2008 should be typed as 20080824)
- File names should contain the title of the document, project or subject matter and the date if applicable.(e.g. “QuebecStreetTrafficStudy” or “CCAgenda\_20170816”)
- Use natural language and spell words out when possible. A list of acceptable abbreviations should be developed for your department and/or division (e.g. “CO” for Certificate of Occupancy, “RZ” for Rezoning). If you choose to use abbreviations for a word then be consistent, do not spell out and abbreviate the same word. For example, spell the word “Building” or use the abbreviation “BLDG” but do not do both
- For sequential numbering, use leading zeros to ensure files sort properly. (e.g. use “001 002...101” instead of “1 2...101”)
- Use version numbers for drafts/revisions of documents (e.g. “MyDataFile\_v01”). The term “Final” should be used for the final version of a record that was previously in draft form or had revisions (e.g. “MyDataFile\_Final”).

Each employee is responsible for naming, saving, and filing of the documents associated with the work they do for the city. DRC’s are responsible for ensuring records transferred to the City’s Electronic Records Management System adheres to established naming conventions, folder structures, and metadata entries.

## **EMAIL & MESSAGING (CHATS, TEXTS, ETC)**

**Email** serves as a communication tool, not a permanent message storage repository. Therefore, electronic messages are not kept indefinitely in the City’s email or messaging systems. Most email correspondence is considered of “Routine Value” and is defined within the Retention Schedule as follows:

*Routing operating documentation or correspondence with limited administrative, legal, fiscal, historical, informational, or statistical value. Includes routine e-mail messages, letters, or memoranda, reading or chronological files that contain duplicates of memos or letters also filed elsewhere, routine requests for information, transmittal documents, etc.*

The IT Department is responsible for setting an automatic retention schedule within the City's email and messaging systems. Employee emails will have a **two-year retention** at which time emails will be permanently deleted.

**Teams/Texts/Co-Pilot Chat** messages are considered "Transitory Value" and is defined within the Retention Schedule as follows:

*General documentation or correspondence of extremely short-term value, including advertisements, drafts and worksheets, desk notes, copies of materials circulated for informational "read only" purposes, other records, including e-mail messages, with preliminary or short-term informational value.*

**Teams messages** will have a **30-day retention** and **Text/Co-Pilot Chat messages** will have a **90-day retention**, at which time messages will be permanently deleted.

Any email or message that qualifies as having long-term value as defined in the Retention Schedule **must** be transferred to Laserfiche. Information about the date sent and received, sender and recipients, and the general subject of the message should be retained with the email or message when storing outside the email or messaging system.

It is important to note that only one official copy of an email should be retained for long-term storage. In most cases the author's copy is the official copy and must be retained. Every employee that received the email does not need to retain their copy of the email. If we receive a communication from someone outside the city and that email has long-term value, the employees on that email should discuss amongst themselves who is filing their copy as the official copy for long-term storage.

It is important to remember that emails and messages are retained based on their contents. If you have questions on whether an email, Teams message, or text message should be retained in Laserfiche or if a message can be deleted immediately, please contact your Deputy Records Custodian.

## **ARTIFICIAL INTELLIGENCE (AI)**

Artificial Intelligence (AI) is an emerging technology that focuses on creating hardware and software that can perform tasks normally done only by humans that rely on learning, reasoning, and problem-solving. As technological and social boundaries of AI continue to evolve, staff should be mindful that any requests, notes, summaries, generative materials (images, videos, audio, etc.) and use of AI may be subject to open records requests. Staff must follow the City's AI Policy and permitted uses of AI while conducting City business.

## **DOCUMENT SCANNING**

The purpose of this policy is to establish minimum quality standards for scanned images of paper documents, when those images constitute official City records. The standards are intended to ensure the ongoing legibility, authenticity and accessibility of the scanned images.

- Optical Character Recognition (OCR) will be applied to all scanned text documents

- Accessibility features will be applied to all documents to maximize access for individuals with disabilities:
- The records will be scanned to render an exact duplication of the original

Once scanned, a quality check of the electronic record should be conducted, ensuring that all pages are accounted for, are readable, are in order, and that there are no extra pages or formatting issues.

Provided the scanned document is an accurate image of the original document(s), it is reproducible and legible, and the digitized copy is safely backed up off-site (cloud storage backups are acceptable), the physical copy may be destroyed.

## **DISASTER RECOVERY OF RECORDS**

**Essential Records**, sometimes called **Vital Records**:

- Are necessary for emergency response
- Are necessary for the continuity and/or resumption of operations
- Protect the health, safety, property, and rights of residents
- Would require massive resources to reconstruct
- Document the history of communities or organizations

Vital/Essential records, regardless of format or archival value, are necessary for the daily functions of government during and after an emergency.

For disaster recovery of records, there are two types to consider, emergency response and continuity response records.

**Emergency response** records are necessary at the time of or shortly after an incident and include emergency action plans, essential records inventories, emergency management staff and contact numbers.

**Continuity response** records are required for agency legal, financial and public responsibilities. These records are required to keep the city functioning for as long as the emergency lasts.

Each department must analyze its own operation and records to determine what information is vital to its continued existence. Answering the following question can help determine Vital Records:

- What records are necessary to resume operations?
- What records are necessary to protect assets, protect legal and financial status of the City, and preserve rights and obligations of employees, customers, stockholders, and citizens?
- How are these records created and where are they stored?
- Does the necessary information reside in more than one medium?
- Are there other sources – inside or outside the organization – from which the records can be retrieved?

Each department is responsible for keeping an inventory list and location of its vital records and is readily available to submit upon request to the Records Manager. Reducing the vulnerability of vital records after different types of disasters is essential and the following steps should be taken to protect these records:

- Keep vital/essential records together in one location and easily accessible
- Store vital/essential records off the floor, in fire resistant metal cabinets/containers and away from any water source
- IT will be responsible for making sure electronic vital/essential records are stored on a secure server and backed up on a regular basis

**Water, fire, and smoke** damage should receive particular attention as they present the greatest danger of damage to records. Moisture in any form and paper don't mix; when exposed to water, paper begins to deteriorate. Mold and bacteria appear within 48 hours in warm weather.

**Immediate action** is required to mitigate water damage:

- Keep water-soaked records as cool as possible with good air circulation
- Use dehumidifiers in small, enclosed areas or fans to circulate air
- Remove standing water
- Contact professional remediation and restoration services

In the event of any disaster, the Records Manager should be contacted immediately to determine what actions should be taken.

<b>Document No.:</b>	
<b>Policy Owner:</b>	Office of the City Clerk
<b>Policy Title:</b>	<i>Records and Information Management (RIM) Policy</i>
<b>Policy Review By:</b>	Kim Garland, Deputy City Clerk
<b>Last Review Date:</b>	April 6, 2026
<b>RETENTION:</b>	<b>C.R.S. Section 40.220(B)</b> Policies and procedures that have long-term value in determining current and past policies or procedures in liability cases, personnel disputes, and other circumstances: <b>Permanent</b>

<b>Policy Approval By:</b>	<b>City Council Resolution 2026-079</b>	
<b>Policy Approval Date:</b>	June 1, 2026	
<b>Director Approval:</b>		Steve Ruger, City Clerk
<b>City Attorney Approval:</b>		Jean Gill, Asst. City Atty
<b>City Manager Approval:</b>		Jason Rogers, City Manager

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