

**SAN DIEGO COUNTY EMPLOYEES RETIREMENT ASSOCIATION
RECORDS RETENTION POLICY**

I. PURPOSE

The Board of Retirement (“Board”) of the San Diego County Employees Retirement Association (“SDCERA”) adopts this policy to establish guidelines for the retention and disposition of all SDCERA records in accordance with their administrative, legal, fiscal and historical value.

II. AUTHORITY

The County Employees Retirement Law of 1937 (“CERL”) provides: “The Board may establish efficient records management procedures, which may include, but need not be limited to, maintenance and, when determined by the Board to be necessary, disposal of records in its jurisdiction.” Government Code Section 31537.

Additionally, the California State Records Management Act (Government Code Section 14740) establishes procedures for maintaining and discarding public records, but does not apply to local government, county or city government agencies. To address this gap, the 1999 legislature added Section 12236 to the Government Code, which directs the Secretary of State to develop a Local Government Records Program to establish guidelines for local government record retention. SDCERA has relied on these guidelines where applicable in developing this Records Retention Policy (Policy).

III. POLICY

This Policy establishes retention and record maintenance processes for all SDCERA records, as set forth below. Changes to this Policy require Board action.

Duties delegated to the CEO under this Policy may be performed by the CEO or the CEO’s delegate, as determined by the CEO.

- A. The Board delegates authority to the Chief Executive Officer (“CEO”) to create and alter, as necessary, the SDCERA Records Retention Schedule. The CEO shall ensure compliance with all applicable laws and regulations. The SDCERA Records Retention Schedule will be consistent with the County of San Diego Records retention policies.
- B. The minimum retention period of a record must be consistent with applicable laws, orders, rules or regulations. When no such criteria exist a reasonable retention period will be established based on SDCERA’s needs and the usefulness of the information.
- C. Once records have fulfilled their administrative, fiscal or legal function they will be disposed of as soon as practical in accordance with the Records Retention Schedule, unless they have enduring historical value as determined by the CEO.
- D. Board action is not required for the destruction of documents in accordance with the Records Retention Schedule.
- E. Exceptions to the Records Retention Policy may be made by the appropriate Manager in consultation with the CEO. Exceptions should weigh the need for retaining the record against the cost to store and retrieve the record.
- F. Retained information must be stored in a manner designed to ensure its accessibility, integrity, confidentiality, authenticity and legibility.
- G. Preliminary drafts, notes and interagency or intra-agency correspondence may be destroyed if they are no longer needed and there is no legal or policy requirement that they be retained.
- H. Imaged files or other electronic reproduction of records shall be deemed to be an “original” record of the paper record and the paper records may be destroyed, upon a determination by the CEO that:
1. The records were electronically imaged or recorded on a medium that is a trusted system and that does not permit additions, deletions or changes to the original document;
 2. The device used to reproduce the record, paper or document on the medium is one which accurately and legibly reproduces the original thereof in all details and that does not permit additions, deletions or changes to the original document images;
 3. The imaged or reproduced records are used by SDCERA in the ordinary conduct of its business in lieu of the paper records and made as accessible for public reference as the paper records were;
 4. A true electronic or paper copy of archival quality shall be kept in a safe and separate place for security purposes; and

5. No pages of any record shall be destroyed if any page cannot be reproduced with full legibility. Every unreproducible page shall be permanently preserved in a manner that will afford easy reference.¹

I. Electronic communications, including e-mail, are considered transitory in nature and are not customarily kept or retained by SDCERA as the primary means for preserving information for future reference. E-mail may be periodically or routinely purged from the system without any necessary action by the sender or the recipient of the communication.

1. If the content of an e-mail message and/or any attachment(s) are necessary for or convenient to, the conduct of SDCERA business and was made for the purpose of preserving its informational content, employees are required to store the e-mail and/or any attachment(s) in the relevant hard copy or electronic file, to be kept in accordance with the Records Retention Schedule.

REVIEW

This policy shall be reviewed by the Board at least every three (3) years and may be amended at any time.

HISTORY

May 25, 2017 Adopted

¹ See Government Code Sections 26205 and 26205.5.