



Blair County Planning Commission

Record Retention Policy

April 28, 2016

BLAIR COUNTY PLANNING COMMISSION
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1. Policy and Purposes

This Policy represents the policy of the Blair County Planning Commission (BCPC) with respect to the retention and destruction of documents and other records, both in hard copy and electronic media (which may merely be referred to as "documents" in this Policy). Purposes of the Policy include (a) retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable legal requirements; (b) destruction of documents which no longer need to be retained; and (c) guidance for the BCPC Board, officers, staff and other constituencies with respect to their responsibilities concerning document retention and destruction. Notwithstanding the foregoing, the organization reserves the right to revise or revoke this Policy at any time.

2. Administration

2.1 Responsibilities of the Administrator. The Planning Director shall be the administrator in charge of the administration of this Policy. The Director's responsibilities shall include supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. The Director shall also be responsible for documenting the actions taken to maintain and/or destroy organization documents and retaining such documentation. The Director may also modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate to reflect organizational policies and procedures. The Director may also appoint one or more assistants to assist in carrying out the Director's responsibilities, with the Director, however, retaining ultimate responsibility for administration of this Policy.

2.2 Responsibilities of Constituencies. This Policy also relates to the responsibilities of board members, staff, volunteers and outsiders with respect to maintaining and documenting the storage and destruction of the Planning Commission's documents. The organization's staff shall be familiar with this Policy, shall act in accordance therewith, and shall assist the Director, as requested, in implementing it. The responsibility of volunteers with respect to this Policy shall be to produce specifically identified documents upon request of management, if the volunteer still retains such documents. In that regard, after each project in which a volunteer has been involved, or each term which the volunteer has served, it shall be the responsibility of the Director to confirm whatever types of documents the volunteer retained and to request any such documents which the Director feels will be necessary for retention by the organization (not by the volunteer). Outsiders may include vendors or other service providers. Depending upon the sensitivity of the documents involved with the particular outsider relationship, the organization, through the Director, shall share this Policy with the outsider, requesting compliance. In particular instances, the Director may require that the contract with the outsider specify the particular responsibilities of the outsider with respect to this Policy.

3. Suspension of Document Destruction; Compliance. The BCPC becomes subject to a duty to preserve or halt the destruction of documents once litigation, an audit or a government investigation is reasonably anticipated. Therefore, if the Director becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the Director shall immediately order a halt to all document destruction under this Policy, communicating the order to all affected constituencies in writing. If any board member or staff member becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the organization, and they are not sure whether the Director is aware of it, they shall make the Director aware of it. Failure to comply with this Policy, including, particularly, disobeying any destruction halt order, could result in possible civil or criminal sanctions.

4. Electronic Documents; Document Integrity. Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Director shall follow the established standards of the Pennsylvania Historic and Museum Commission for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the organization.

5. Privacy. It shall be the responsibility of the Director to determine how privacy laws will apply to the organization's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

6. Emergency Planning. Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Director shall develop reasonable procedures for document retention in the case of an emergency.

7. Document Creation and Generation. The Director shall discuss with staff the ways in which documents are created or generated. With respect to each employee or organizational function, the Director shall attempt to determine whether documents are created which can be easily segregated from others, so that, when it comes time to destroy (or retain) those documents, they can be easily culled from the others for disposition. For example, on an employee-by-employee basis, are e-mails and other documents of a significantly non-sensitive nature so that they might be deleted, even in the face of a litigation hold with respect to other, more sensitive, documents? This dialogue may help in achieving a major purpose of the Policy -- to conserve resources -- by identifying document streams in a way that will allow the Policy to routinely provide for destruction of documents. Ideally, the organization will create and archive documents in a way that can readily identify and destroy documents with similar expirations.

8. Document Retention Schedule.

The Director shall annually review all files and records to determine currency and if found to not be current, whether the record may be destroyed. The Director shall use the County Record Retention Manual published by the Pennsylvania Historic and Museum Commission for a schedule of retention. As relates to that manual, the Director may dispose of development review files five years after the latest date found within the file. This will likely be either the date of the review letter, or the date the plan was recorded with the Recorder of Deeds. This exception is due to the fact that the Blair County Planning Commission is neither the final authority on such reviews, nor has any approval authority whatsoever.