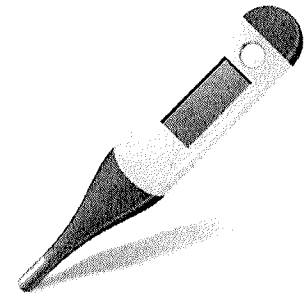


Using Records Retention Schedules: How Long Do COVID-19 Contact Tracing Logs and Screening Records Need to Be Kept?

Purpose: Provide guidance to state and local agencies on the required retention for records of COVID-19 logs and screenings administered to employees and visitors by the agency to ensure a safe working environment and to assist in contact tracing.

In response to the recent COVID-19 pandemic, many agencies have begun screening employees and visitors for signs of infection as well as creating logs to assist with any necessary contact tracing. The most common screening methods agencies have implemented are temperature tests and surveys asking about symptoms and potential exposures.



Retain until no longer needed for agency business

DISPOSITION AUTHORITY NUMBER (DAN)	DESCRIPTION OF RECORDS	RETENTION AND DISPOSITION ACTION	DESIGNATION
GS 25009 Rev. 0 (for State Government Agencies)	Entry/Exit Logs – Facilities (COVID-19 Checks/Logs) Records documenting COVID-19-related checks/logs of staff and visitors to agency facilities, such as: <ul style="list-style-type: none"> Wellness/temperature checks; Contact details captured solely for tracing purposes; Records relating to contact tracing by the agency. Excludes records covered by <i>Entry/Exit Logs – Facilities (DAN GS 25007)</i> . <i>State Government General Records Retention Schedule</i>	Retain until no longer needed for agency business <i>then</i> Destroy.	NON-ARCHIVAL NON-ESSENTIAL OFM
GS2020-009 Rev. 0 (for Local Government Agencies)	Security Monitoring – Employee and Public Access (COVID-19 Checks/Logs) Records documenting COVID-19-related checks/logs of staff and visitors to agency facilities, such as: <ul style="list-style-type: none"> Wellness/temperature checks; Contact details captured solely for tracing purposes; Records relating to contact tracing by the agency. Excludes records covered by <i>Entry/Exit Logs – Facilities (DAN GS 25007)</i> . <i>Local Government Common Records Retention Schedule (CORE)</i>	Retain until no longer needed for agency business <i>then</i> Destroy.	NON-ARCHIVAL NON-ESSENTIAL OFM

Note: Medical testing records administered to the general public by hospital districts, health departments, emergency medical service providers, and other agencies whose primary business is providing medical services should be retained under the appropriate sector-specific or agency-unique records retention schedule.

**Additional advice regarding the management of public records is available from
Washington State Archives:**

www.sos.wa.gov/archives
recordsmanagement@sos.wa.gov

Using Records Retention Schedules: What Does “Until No Longer Needed for Agency Business” Mean?

Purpose: Provide guidance to state agencies and local government entities on how to apply the commonly used retention period “Until no longer needed for agency business”.

What Does This Mean?

When records retention schedules have a retention of “Until no longer needed for agency business”, this means that:

- There are **no identified audit/legal retention requirements**;
- The retention need is **based on the agency’s business need** for the record, which **may vary** from agency to agency and from one type of record to another;
- It is **not the same as zero retention** – the agency’s business need for the record may be very short or quite long.

How Should It Be Applied?

In order for retention to be applied consistently and systematically (both across the agency and over time), agencies should:

1. **Determine what the business need is** for particular types of records in particular business units within the agency;
2. **Calculate the timeframe** that satisfies those business needs;
3. **Document** both the business needs and timeframes **in agency policies/procedures**.

When determining the **business need for “Archival” records**, the agency should consider that:

- a) The records will **remain accessible** to the agency even after transfer to the Archives; and
- b) The earlier the records can be transferred, the sooner the records can **benefit from the Archives’ long-term preservation methods** to ensure access (especially for electronic records).

Therefore, business needs should be limited to just the **specific, shorter-term needs to access** the records.

As agencies implement Enterprise Content Management (ECM) systems, these documented business needs will inform the business rules that can be used to calculate appropriate destruction/transfer dates.

**Additional advice regarding the management of public records is available from
Washington State Archives:**

**www.sos.wa.gov/archives
recordsmanagement@sos.wa.gov**

Using Records Retention Schedules: How Long Do COVID-19 Pandemic Records Need to Be Kept?

Purpose: Provide guidance to state and local government agencies on the retention requirements for records relating to the agency's response to the COVID-19 pandemic.

State and local agencies will want to document their actions in response to this global emergency in order to preserve an accurate historical account of life in our state during the novel coronavirus pandemic. Records documenting your agency's response to the pandemic should be retained for 6 years and then transferred to Washington State Archives under ***Emergency/Disaster Response/Recovery – Significant/Uncommon or Major (DAN GS 25006/GS 50-18-29)***.

The "ARCHIVAL" records of your agency's response may include:

- ✓ Emergency operations center activities and communications; State of Emergency/disaster damage declaration; Invocation of mutual aid or interlocal agreements with adjoining local jurisdictions; Federal Emergency Management Agency (FEMA) claims;
- ✓ Records documenting the creation and administration of new or temporary services offered by the agency to provide relief/aid to those experiencing hardship due to the pandemic; Actions implemented to protect life, property, public peace, the environment, and/or the economic base of the community;
- ✓ Notices informing the public about limited agency services or operations via social media posts, agency websites, press releases, or mailing lists; Public feedback evaluating the agency's response to the pandemic, limited services, or pandemic-related special services;
- ✓ Photos/video documenting the agency's response, such as photos of notices posted in agency buildings, photos of social distancing measures implemented in the agency's office or jurisdiction, recorded webinars presented by the agency in lieu of in-person trainings, etc.
- ✓ Internal memos and reports documenting new work arrangements or new remote work procedures in response to the Governor's "Stay Home, Stay Healthy" Order.

NOTE: Agencies whose core business includes responding to pandemics, such as the Military Department, health departments/districts, law enforcement agencies, etc., should follow the retention requirements in their agency-specific or sector-specific records retention schedules.

What records shouldn't be included?

These records should be retained as normal under the appropriate records retention schedule:

- ✗ Employee medical records, including temperature tests taken at the beginning of each shift or results from employees being tested for COVID-19;
- ✗ Purchase requests for agency-provided devices, new software, or VPN access to agency networks to enable staff to work remotely;
- ✗ Client-specific records of the agency providing relief/aid to individuals or records of the agency responding to individual inquiries for clarification on agency services.

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Washington State Archives:**

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recordsmanagement@sos.wa.gov**

