



Office of the Public Records Administrator
Connecticut State Library
State of Connecticut

Public Records Policy 03: Public Records Storage Facilities

Date Issued: January 25, 2012

Supersedes: This policy supersedes *General Letter 2008-3: Off-site Public Records Storage Facilities* (revised 10/20/08) and the *Required Minimum Standards for Public Records Storage Facilities* (revised 10/2008).

I. Scope and Authority

Scope

This policy sets the standards for public records storage facilities. It applies to all state agencies within the executive branch, as well as the towns, cities, boroughs, districts, and other political subdivisions of the state.

Authority

The Office of the Public Records Administrator is authorized to supervise the operation of the State Records Center and to approve public records storage facilities, within or without the state, under the authority granted by §11-8 and §11-8a of the *General Statutes of Connecticut* (CGS).

Definitions

As used within in this policy:

“Agency” means a state agency, municipality, or political subdivision falling under the authority of the records management program administered by the Connecticut State Library as specified in CGS §11-8.

“Public Records Storage Facility” means a facility operated by an agency or commercial vendor that is located away from the agency’s primary office or place of business, including, but not limited to, the State Records Center operated by the State Library; a facility operated by, or on behalf of, one or more agencies other than the State Library; and a commercial records storage facility operated by a private entity.

“Records Storage Area” means an area within a public records storage facility dedicated to records storage.

II. Policies

Agency Responsibilities

Agencies may store records at a public records storage facility provided that the facility has been approved by this office. Contact this office to obtain a listing of all approved facilities.

Records transferred to a public records storage facility remain in the legal custody of the agency; the facility exercises physical custody of the records only. It is the records custodian’s responsibility to ensure that the records are maintained in compliance with all relevant records management requirements, including preservation, accessibility, retention, and disposition. Records transferred off-site must be listed on an approved records retention schedule.

Agencies must maintain an inventory of records stored at the facility, including records series titles, date ranges, and disposition dates. The agency must regularly monitor the records and request disposition by obtaining receipt of an approved *Records Disposition Authorization* (Form RC-073, RC-075, RC-108, or RC-100).

Related Statutory Requirements

See CGS §7-35a regarding off-site storage of original documents by municipalities. See CGS §7-27 regarding storage of municipal records in fire-resistive vaults or safes. See CGS §7-42 regarding storage of records by registrars of vital statistics. See CGS §9-23(b) regarding storage of active voter registration cards in fire-resistant cabinets.

III. Standards for Public Records Storage Facilities

A. Facility Location and Construction

1. The facility shall not be located in any area where the risks of natural disasters, man-made disasters, or external hazards pose a significant threat to the facility and/or its contents.
2. The facility shall be sited 5 feet above and 100 feet from any 100-year flood plain area or be protected by an appropriate flood wall.
3. The facility shall meet or exceed the requirements of the local or state building code, whichever is more stringent.
4. The facility shall be constructed with non-combustible materials and shall be well-maintained, with a roof that is free of leaks.
5. The facility should have one or more loading docks.

B. Facility Environmental Controls

1. The facility shall be kept clean to avoid accumulation of dirt and dust particulates.
2. The facility should be air conditioned (temperature, humidity, and air exchange). If it is not, it shall be well-ventilated and shall not be subject to rapid and extreme fluctuations of temperature and humidity (more than ± 3 percent during a 24 hour period).
3. The facility shall be free of pests and shall have a pest control program to guard against insects and rodents.
4. The facility shall be well-lighted, but records shall not be subject to prolonged exposure to direct UV light.
5. Eating, drinking, and smoking shall be prohibited in records storage areas.
6. Records shall not be placed in areas with exposed water or steam pipes subject to leaking.
7. Records shall not be placed in areas that are adjacent to furnaces or boilers unless separated by a 4-hour rated fire barrier.

C. Records Storage Shelving and Racking Systems

1. Records shall not be stored on pressboard, wood, or other combustible shelving materials.
2. Racking systems, steel shelving, or other open-shelf records storage equipment shall be braced to prevent collapse under full load.
3. Compact mobile shelving systems, if used, shall be designed to permit proper air circulation and fire protection.
4. Records shall be located a minimum of three inches from the floor.

D. Facility Security and Fire Protection

1. The facility shall be equipped with an anti-intrusion alarm system.

2. The facility shall be restricted to authorized persons only, including access to records storage areas.
3. The facility shall have exterior doors that are strongly constructed, close fitting, and equipped with thief-resistant locks.
4. The facility shall be equipped with operational fire detection and protection systems. The fire detection mechanism shall have an alarm that reports to an outside source, such as an alarm company or local emergency responder.
5. The facility shall be equipped with automatic sprinkler systems in records storage areas.
6. Records storage areas shall be separated from each other and from other storage areas in the facility by a minimum 3-hour rated fire barrier.
7. Records storage areas shall be separated from offices and research rooms by a minimum 1-hour rated fire barrier.
8. The facility shall contain an adequate supply of well-distributed portable fire extinguishers.
9. Hazardous materials, such as flammables (e.g., oils, paints, gasoline, and propane) shall not be stored in records storage areas.
10. The facility shall have a sufficient number of "No Smoking" signs distributed throughout the facility.
11. The facility shall have a written emergency management or disaster plan that is reviewed on an annual basis. The plan shall consist of the following minimum components: staff lists, contact information, and roles in the event of an emergency; analysis of risks for the facility; preventative measures; procedures to keep a current inventory; and should include salvage priorities and contact information for emergency recovery service companies.
12. The facility shall have an indexing / tracking system for stored records, including the ability to determine disposition eligibility when retention periods have been met.
13. The facility operator should conduct criminal and financial background checks on employees and have employees sign statements of personal responsibility and liability for unauthorized release of records or information contained in them.

IV. Approval and Inspection Requirements for Public Records Storage Facilities

Inspection of Public Records Storage Facilities

To schedule an inspection of a facility, agencies or commercial vendors must submit a *Public Records Storage Facility Pre-Inspection Profile* (Form RC-150) and supporting documentation to this office. Staff will schedule a site visit to conduct a visual inspection of the facility.

Approval of Public Records Storage Facilities

If a facility is approved, staff will issue a letter and a *Public Records Storage Facility Certificate of Approval* (Form RC-150.2). The *Certificate of Approval* is valid for a period of 10 years from the date of approval, unless there is a change in ownership; a significant renovation, repair, or damage to the facility; or a re-inspection finds that the facility does not meet the *Standards for Public Records Storage Facilities*. If a facility is not approved, this office will issue a denial letter outlining the deficiencies. The agency or commercial vendor may request a re-inspection following remediation of the identified deficiencies.

V. References

ARMA International. *Records Center Operations, 2nd Edition*. Lenexa, Ka.: ARMA International, 2002.

National Archives and Records Administration Code of Federal Regulations. *36 CFR Part 1234 Facility Standards for Records*. College Park, Md.: NARA, 2009.

National Fire Protection Association. *NFPA 232 Standard for the Protection of Records*. Quincy, Mass.: National Fire Protection Association, 2011.

National Information Standards Organization. *Environmental Guidelines for the Storage of Paper Records*. Bethesda, Md.: NISO Press, 1995.

PRISM International. *Commercial Records Center Self Evaluation Checklist*. Garner, Nc.: PRISM International, 1993.

Pacifico, Michele F. and Thomas P. Wilsted. *Archival and Special Collections Facilities: Guidelines for Archivists, Librarians, Architects, and Engineers*. Chicago: Society of American Archivists, 2009.

If you have any questions regarding this policy, please contact this office at (860) 757-6540.

Approved by



LeAnn R. Power, CRM
Public Records Administrator

January 25, 2012
Date