



**Region 16 Local Operating Policy**

<b>Title:</b>	<b>Public Records Policy (Retention and Disposition ONLY)</b>
<b>Effective:</b>	<b>01/15/2026</b>
<b>Revised:</b>	<b>N/A</b>

**DISTRIBUTION: CAREERSOURCE PASCO HERNANDO STAFF**

**PURPOSE:** This policy outlines the guidelines for managing public records at CareerSource Pasco Hernando (CSPH). It ensures compliance with applicable federal and state laws, including procedures for:

- a) Retention and maintenance; and
- b) destruction of documents which no longer need to be retained;
- c) timely processing of public records requests in a customer friendly process; and
- d) guidance for the Board of Directors, staff and contractors with respect to their responsibilities concerning document access, retention and destruction.

This policy applies to programmatic, administrative, HR, board, and general operational records created or received by CSPH. Fiscal and financial records are excluded and governed under a separate policy. See separate Fiscal Records & Financial Documentation Policy.

**BACKGROUND:** CSPH is a Florida not-for-profit corporation that serves as one of the local workforce boards in the State of Florida under the direction of the Florida Department of Commerce and CareerSource Florida. CSPH was designated as the “administrative entity and fiscal agent for all programs promulgated” under the Workforce Innovation and Opportunity Act of 2014 and Florida’s Workforce Innovation Act of 2000. As such, CSPH is subject to the Public Records Act.

Regional Workforce Boards are required to have processes and procedures in place to manage, retain and properly dispose of program and financial records in accordance with OMB Circular A-110; Chapter 119, Florida Statutes; Florida Administrative Code 1B-26.003; Florida Administrative Code 1B-24.003 and specific program related federal requirements including, but not limited to, 29 CFR 97.42 and 95.53.

The Florida Public Records Law requires that public agencies, such as CareerSource Pasco Hernando, retain public records in accordance with the Department of State’s published required retention

schedules. CareerSource Pasco Hernando is also subject to federal record retention laws and regulations.

CSPH will retain all public records/documents for a minimum of the durations outlined in the Department of State's retention schedules for GS1-SL, State and Local Governments, or the applicable federal program retention schedules. All staff are required to adhere to this policy when retaining public records/documents. For detailed information, refer to the Florida Department of State, Division of Library and Information Services, Records Management website:<https://dos.myflorida.com/library-archives/records-management/general-records-schedules/>

**POLICY:** CareerSource Pasco Hernando's primary information and records management systems are ATLAS for programmatic records and a specified drive on the internal server for other records. Where possible, all paper documents received or created should be converted to digital format (pdf) and saved into either ATLAS or on our internal server as appropriate. Once a public record is digitalized, CareerSource Pasco Hernando shall maintain the electronic copy as the public record and the paper copy shall then be considered a duplicate. As a duplicate, the administrative value is immediately lost, the paper copy can be disposed of in accordance with this policy's disposition requirements.

In limited circumstances, such as medical records, there may be a need for paper files to be created and maintained in accordance with the records retention schedule. Any public files that are created and maintained should be stored in Bankers boxes for storage. Staff will complete the Records Storage Box Label (See Attachment A – Records Storage Box Label).

1. Three copies of the box label must be produced; one attached to the outside of the box, one inside the box and a copy provided to Public Records Coordinator or his/her designee.
2. All fields of the box label must be completed.
3. After completing the box label, print it out and fold it in half.
  - a. Tape the label (all edges taped down) to the short end of the box. Note, only record storage boxes should be used – do not use empty boxes not made for record storage, such as a copy paper box.
  - b. Insert the duplicate as the first page in the front of the records inside the box.
4. Notify Public Records Coordinator of the number of boxes that must be moved to storage. Any boxes not conforming to the above requirements will not be accepted into storage.

Staff shall refer to the General Record Schedule found on the Florida Department of State, Division of Library and information Services, Records Management website for the most up-to-date version of the General Record Schedule: <https://dos.fl.gov/library-archives/records-management/general-records-schedules/>

If a similar record series is listed in two general record schedules, the schedule with the longer retention requirement shall take precedence. The retention period stated in the applicable schedule is the minimum time a record must be maintained. If two or more record series are filed together, the combined file must be retained through the longest retention period of those records.

When trying to determine when records are eligible for disposition, staff must be aware of the different types of retention requirements. For instance, records with a retention of "5 anniversary years" will have a different eligibility date from records with a retention of "5 fiscal years" or "5 calendar years."

Below outline different types of retention period requirements:

- a) Anniversary Year – from a specific date
  - a. If a record series has a retention of “5 anniversary years,” the eligibility date would be 5 years after the ending date of the series.
- b) Calendar Year – January 1 through December 31
  - a. If a record series has a retention of “5 calendar years,” the eligibility date would be 5 years after the end of the calendar year of the last record in the series.
- c) Fiscal year – July 1 through June 30
  - a. If a record series has a retention of “5 fiscal years,” the eligibility date would be 5 years after the end of the fiscal year of the last record in the series.
- d) Retain until obsolete, superseded, or administrative value is lost (OSA)
  - a. With this retention, records become eligible for disposition upon or after a specific triggering event, such as validation of the physical copy now being accessible via a digital copy within ATLAS.

**Records Request:**

It is the policy of CSPH that all public records are not exempt or confidential and are in CSPH possession shall be made available and open for inspection by any person desiring to do so at a reasonable time, under reasonable conditions, and under the supervision of the Public Records Coordinator or his or her designee subject to the fees provided below. Reasonable conditions mean that inspection must be done during normal business hours of CSPH, excluding CSPH holidays. CSPH is not required to create a new record, reformat, or provide an explanation of a document. CSPH's responsibility is to make the requested existing records available pursuant to the requirements of the Florida Constitution and the Public Records Act.

**Records Retention:**

The Florida Public Records Law requires that local workforce boards, such as CSPH, retain public records in accordance with the Department of State's published required retention schedules. CSPH is also subject to federal record retention laws and regulations. CareerSource Pasco Hernando shall retain all public records/documents for at least the minimum times shown in the Department of State's retention schedules for GS1-SL, State and Local Governments (the schedule that must be followed by CareerSource Pasco Hernando) or the applicable federal program retention schedule. All staff must retain all public records/documents as described within this policy. Information on the General Record Schedules can be found on the Florida Department of State, Division of Library and Information Services, Records Management website: <https://dos.myflorida.com/library-archives/records-management/general-records-schedules/>

CareerSource Pasco Hernando's primary information and records management systems are ATLAS for programmatic records and a specified drive on the internal server for other records. Where possible, all paper documents received or created should be converted to digital format (pdf) and saved into either ATLAS or on our internal server as appropriate. Once a public record is digitized, CareerSource Pasco Hernando shall maintain the electronic copy as the public record and the paper copy shall then be considered a duplicate. As a duplicate, the administrative value is immediately lost, the paper copy can be disposed of in accordance with this policy's disposition requirements.

In limited circumstances, such as medical records, there may be a need for paper files to be created and maintained in accordance with the records retention schedule.

**Definitions:**

1. **Actual Cost:** The cost of goods and supplies used to duplicate the requested material does not include the labor cost or overhead cost associated with such duplication.
2. **Confidential:** Information that has been declared confidential by Florida or federal law. As used in this policy, the term confidential refers to entire record systems, specific records, or individually identifiable data that by law are not subject to public disclosure under Article 1, Section 24 of the Florida Constitution, Chapter 119 of the Florida Statutes, or applicable federal laws. Confidential information is not subject to inspection by the public and may be released only to those persons and entities as specifically designated in relevant statutes. In the absence of specific statutory provision allowing its release, disclosure of confidential information is prohibited.
3. **Exempt Records:** Records that contain information which is expressly made not subject to the mandatory access requirements of the Public Records Act.
4. **Extensive:** As used herein with reference to labor involved to accommodate a public records request, means where CSPH personnel must spend more than thirty (30) minutes to locate, retrieve, copy, refile, review and redact, if necessary, the requested material in order to comply with the request.
5. **Information Technology Resources:** Data processing hardware and software and services, communications, supplies, personnel, facility resources, maintenance, and training.
6. **Public Records:** All documents, papers, letters, maps, books, tapes, photographs, films, sound recordings, data processing software, or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by CSPH. Public records include all materials made or received by CSPH in connection with official business which are used to perpetuate, communicate or formalize knowledge, regardless of whether in final form.
7. **Readily Available documents:** Documents that are easily accessible and retrievable by CSPH and do not require additional review in order to determine whether they contain confidential or exempt information, such as agendas and meeting minutes.
8. **Redact:** To conceal from a copy of an original public record, or to conceal from an electronic image that is available for public viewing, that portion of the record containing exempt or confidential information.
9. **Special Service Charge:** The fee that will be charged, in addition to the actual cost of duplication, if the nature or volume of material requested to be inspected, examined or copied is such as to require extensive use of information technology resources or extensive clerical or supervisory assistance by CSPH staff, or both.

**Public Records Coordinator:**

CSPH's Chief Executive Officer will designate a Public Records Coordinator who will act as the contact person for all public records request and will be responsible for logging and tracking public records requests for all CSPH departments, with the exception of those records that the Public Records Coordinator considers Readily Available Documents.

**Fees:**

As appropriate, fees may apply to a public records request. The fee structure is as follows:

1. Payment of fees will be payable by U.S. money order at the time records are picked up or prepaid if records are mailed.

When providing a copy of a public record, the fee which may be charged is:

**Fee Schedule**

Photocopies:	<ul style="list-style-type: none"><li>• No charge for first ten (10) single sided page copies</li><li>• \$0.15 for each additional letter/legal one-sided copy</li><li>• \$0.20 for each additional two-sided copy</li></ul>
Audio tape duplication:	<ul style="list-style-type: none"><li>• Actual cost incurred</li></ul>
Digital data duplication:	<ul style="list-style-type: none"><li>• Actual cost incurred</li></ul>
Archived document retrieval:	<ul style="list-style-type: none"><li>• Actual cost incurred</li></ul>
Postage:	<ul style="list-style-type: none"><li>• Actual mailed fee</li><li>• *<i>When documents are mailed.</i></li></ul>
Certified copies:	<ul style="list-style-type: none"><li>• \$1.00 for each page</li></ul>
All other copies:	<ul style="list-style-type: none"><li>• Actual cost incurred</li></ul>
Special Service Charge:	<ul style="list-style-type: none"><li>• Charges will be calculated based on the cost of wages and benefits of the personnel who perform the public records request</li></ul>

2. A **Special Service Charge** pursuant of subsection 119.07(4) (d) of the Florida Statutes, will be added to the fee for duplicating the requested material if the nature or volume of public records requested to be inspected or copied is such as to require extensive use of information technology resources or extensive clerical or supervisory assistance by personnel of CSPH, or both. The Special Service Charge shall be reasonable and based on the cost incurred for such extensive use of information technology resources or the labor cost of the personnel providing the service that is actually incurred by CSPH or attributable to CSPH for the clerical and supervisory assistance required, or both. The Special Service Charge shall be in addition to the actual cost of duplication. CSPH shall assess a Special Service Charge when CSPH personnel spend more than thirty (30) minutes retrieving records, reviewing them for exempt or confidential information, redacting such information (if applicable), and preparing, copying, and refiling them. The rate charged for clerical or supervisory assistance will be based on that of the lowest paid full-time CSPH personnel capable of processing public records requests (based on salary and

benefits) even if a specific request requires labor by higher-paid employees. In instances where legal review is necessary, the charge will be based on the attorney fees charged to CSPH. After the first thirty (30) minutes, hourly rates will be charged by the quarter hour.

3. When documents are sent by email, the only charge will be a Special Service Charge, if applicable.

#### **Disposition of Public Records:**

Contained within the Department of State's Records Management Manual is a requirement that agencies *"dispose of records that have met their retention requirements and are no longer needed."* There are three general requirements for disposing of public records:

- 1) CareerSource Pasco Hernando must ensure that the records have met all retention requirements;
- 2) CareerSource Pasco Hernando must document internally the disposition of any public records in accordance with Rule 1B-24.003(9)(d), Florida Administrative Code.; and
- 3) Rule 1B-24.003(10), Florida Administrative Code, specifies that destruction of public records must be done *"in a manner that safeguards the interests of the state and the safety, security, and privacy of individuals."*

CareerSource Pasco Hernando shall adhere to the Department of State's published guidelines regarding the physical disposition or destruction of public records/documents, including

- A. Delaying record disposition due to pending or reasonably anticipated legal action, an audit that has not closed, a current public record request, or a government investigation has been launched or is reasonably anticipated;
- B. Ensuring that Personally Identifiable Information is protected during the disposition; and
- C. Completing and maintaining disposition records permanently. The Department of State's published guidelines require that CareerSource Pasco Hernando identify and document the following when disposing of public records/documents (with the exception of records that have retention of "Retain until obsolete, superseded or administrative value is lost.") This shall be accomplished using the CareerSource Pasco Hernando record disposition form.
  - 1) Records retention schedule number;
  - 2) Item number;
  - 3) Record series title;
  - 4) Inclusive dates of the records;
  - 5) Volume in cubic feet for paper records; for electronic records, record the number of bytes and/or records and/or files if known, or indicate that the disposed records were in electronic form;
  - 6) Disposition action (manner of disposition) and date; and
  - 7) Verification from the company destroying the records.

No staff, other than the Public Records Coordinator, has the authority to dispose of any record or document unless:

- The document is a Personal and Private Document as defined above, or
- The retention schedule designates the record as "Obsolete, superseded, or administrative value is lost."

When a record falls under this designation, staff may dispose of the document by placing it in one of the shred bins located throughout the offices of CareerSource Pasco Hernando.

Each department is responsible for ensuring that records associated with the programs they oversee are prepared, processed, and disposed of in accordance with state retention schedules and organizational guidelines. Departments must also ensure that appropriate documentation is completed, maintained permanently, and includes all required disposition details.

If a staff member becomes aware of any issue, uncertainty, or potential conflict regarding responsibility for the disposition of public records/documents, they must promptly notify their immediate supervisor to ensure timely clarification and corrective action.

At the end of each program year, each department shall issue internal communication to their program staff outlining:

- Records that must be prepared for disposal, and
- Records that must be retained for the upcoming year.

Departments are responsible for ensuring that this communication is distributed, understood, and acted upon in a timely manner.

#### **References:**

- [Florida Statutes, Chapter 119: Public Records](#)
- [2 CFR Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)
- [Florida Administrative Code 1B-26.003: Electronic Recordkeeping](#)
- [Florida Administrative Code 1B-24.003: Public Records Scheduling and Disposition](#)
- [29 CFR 97.42: Retention and access requirements for records](#)
- [29 CFR 95.53: Retention and access requirements for records](#)
- [Florida Constitution, Article 1, Section 24: Access to public records and meetings](#)
- [Florida Department of State, Division of Library and Information Services, Records Management: General Records Schedules](#)
- [State of Florida General Records Schedule GS1-SI for State and Local Government Agencies](#)
- [Florida Department of State, Division of Library and Information Services: The Basics of Records Management](#)

**INQUIRIES:** Any questions about this procedure should be directed to the Chief Executive Officer, Chief Financial Officer and/or their designee.