LOS ANGELES COUNTY
REGISTRAR-RECORDER/COUNTY CLERK

DEAN C. LOGAN
Registrar-Recorder/County Clerk

September 15, 2026

ADOPTED
BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

31 September 15, 2026

EDWARD YEN
EXECUTIVE OFFICER

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Supervisors:

RECOMMENDATION TO APPROVE REVISED BOARD POLICY NO. 3.040, REGARDING COUNTY RECORDS MANAGEMENT AND ARCHIVE - RECORDS RETENTION SCHEDULE REVIEW FORMS
(ALL SUPERVISORIAL DISTRICTS) (4 VOTES)

SUBJECT

The Los Angeles County Registrar-Recorder/County Clerk (RR/CC) seeks approval of the revised Board Policy No. 3.040, which involves aligning the protocols for amending the General Records Retention Schedule (GRRS) with the Departmental Records Retention Schedule (DRRS), creating a consistent countywide standard and strengthening governance over records retention schedules. This amended disposition process will require official consent from both the Department Head of the submitting Department and their County Counsel, as well as from the RR/CC Records Management and Archives (RMA) Section for any revisions or additions to the GRRS and DRRS. Upon approval, the new GRRS Review Form will be adopted as the official countywide standard for all Departments and agencies, superseding any existing GRRS Review Form currently in use.

IT IS RECOMMENDED THAT THE BOARD:

1. Approve the revised Board Policy No. 3.040 (Attachment I), to align the GRRS and DRRS process creating a consistent countywide standard and strengthening governance over records retention schedules.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

In April of 2013, Section 2.32.370 of the County Code was amended to direct the RR/CC to develop and administer a comprehensive countywide records management program. As part of this directive, the RR/CC has consulted with County Departments to create General and Department-specific

record retention and disposition schedules.

This revision of Board Policy No. 3.040 establishes new guidelines for records retention. Record Retention Schedules may now be modified periodically after receiving approval from Department Heads, County Counsel, and RMA.

Previously, any revisions to the GRRS required only RMA approval. By contrast, the DRRS required approval from the submitting Department Head, their County Counsel, and RMA. Thus, the review process for revisions to the GRRS and DRRS were inconsistent and not aligned. Given the critical importance of the GRRS—as it encompasses procedures for all records countywide—it is essential to implement a standardized review protocol that includes Department Heads and the Department's County Counsel for both the GRRS and DRRS.

To improve oversight of GRRS revisions and to ensure a consistent review process for changes to both schedules, the RR/CC recommends that any modifications or additions to the GRRS must be reviewed and approved by the submitting Department Head, the Department's County Counsel, and RMA prior to the revised Records Retention Schedule taking effect. To support the application of this review and approval process for these retention schedules, the RR/CC recommends revisions to Board Policy No. 3.040.

In addition, this revised policy will ensure records are purged or appropriately disposed of after exceeding their retention period, explicitly directing Departments to destroy those records unless a legal or other exception applies.

Implementation of Strategic Plan Goals

This request supports the County Strategic Plan, North Star 3, Focus Area Goal G: Internal Controls & Processes, "Strengthen our internal controls and processes while being cognizant of efficiency to continue good stewardship of the public trust and fiscal responsibility”. Upon approval of this policy revision, all Departments will be required to adhere to a universal review and approval standard when submitting revisions to the GRRS or DRRS.

All proposed revisions in revised Board Policy No. 3.040 (Attachment I) are intended to enhance the overall effectiveness of Board Policy No. 3.040. This formalized adoption of a revised review and approval process for the GRRS maintains the substance of the original Board Policy No. 3.040.

FISCAL IMPACT/FINANCING

There is no anticipated fiscal impact associated with maintaining this policy. The proposed revisions primarily clarify and standardize existing records retention review and approval procedures and will be implemented using existing departmental resources.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

Pursuant to Government Code section 26202, the Board of Supervisors may authorize the implementation of the revised GRRS Revision Review Document by a four-fifths vote. Once your Board approves the attached policy, the GRRS and DRRS Revision Review Documents will serve as formal procedures for County Departments to review, revise, and obtain approval for their GRRS and DRRS revision forms.

These standards will guide individual Departments in properly reviewing, revising, adding, deleting,

and approving changes to the GRRS and DRRS. Upon the Board's approval of the proposed policy, RMA will continue to oversee the program and support the efforts of the Departments.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

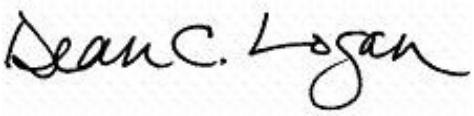
N/A.

CONCLUSION

Approval of revised Board Policy No. 3.040 (Attachment I) directs County Departments to use the policy for review of and revisions to the GRRS and DRRS and ensure that the record retention review process for the GRRS and DRRS is completed in a consistent, efficient, and legally compliant manner.

If you have any questions, please contact me at (562) 462-2716 or email dlogan@rrcc.lacounty.gov. Your staff may also contact Ivan Masayon, Assistant Registrar-Recorder/County Clerk, at 562-246-1879 or email IMasayon@rrcc.lacounty.gov.

Respectfully submitted,



DEAN C. LOGAN

Registrar-Recorder/County Clerk

DC:JJ:IM
JK:PV:es

Enclosures

c: Chief Executive Officer
Chief Information Officer
County Counsel

Policy #:	Title:	Effective Date:
3.040	Records Management and Archive of County Records	05/13/1958

PURPOSE

Provides departments with general records management and archiving guidelines in the creation/receipt, use, retention, and disposition of official County records.

REFERENCE

May 13, 1958, Board Order Synopsis 46

Government Code Sections 26201; 26202; 26205; 26205.1; and 12168.7

October 3, 2006, Board Order No. 16

Policy No. 6.112: Secure Disposition for Computing Devices

April 30, 2013, Board Order No. 71

Los Angeles County Code, Chapter 2.32 – Registrar-Recorder/County Clerk

June 14, 2016, Board Order No. 33

Records Retention Schedule

POLICY

County Records Management and Archives Program

The Registrar-Recorder/County Clerk's Records Management and Archives (RMA) is responsible for developing and administering records management and archiving protocols and guidelines. The RMA shall take steps to publish and disseminate record retention schedules and other records management protocols and guidelines to assist County departments in discharging their records management and archives responsibilities.

Definition of Official Public Record

An official public record is a thing, based on its content and regardless of its medium, which constitutes an objective lasting indication of a writing, event, or other information, which is in the custody of a County officer and is kept either (1) because a law requires it to be kept or (2) because it is necessary or convenient to the discharge of the County officer's duties and was made or retained for the purpose of preserving its informational content for future reference. (64 Ops.Cal.Atty.Gen 317 (1981) (No. 80-1006.)

An official public record, as defined herein, relates to record retention and destruction purposes and differs from the definition of a public record under the California Public Records Act (Govt. Code § 7920.000 et seq.) in that the latter is construed more broadly.

An official public record may include records maintained in County and applicable County contractor offices, storage areas, electronic systems, and electronic storage devices. These storage devices include networked servers, mainframes, data warehouses, storage area networks, electronic data interchanges, imaging and document management systems, personal computers, laptops, internal or external hard drives, magnetic tapes, optical disks, and any other system or device used to perform County business.
As a general rule, official public records are County property regardless of how or where they are stored, and they will remain the property of the County until their eventual disposition. Employees and third-party contractors shall not donate, sell, nor take sole physical control or possession of County records produced by the County. This includes records that have already met their retention period and are set for disposition. However, certain exceptions may exist. Thus, when any questions arise relating to this subject matter, County Counsel should be consulted.

The following examples are not considered to be official public records (i.e. non-records):

1) Duplicates of an official record made solely for convenience or reference
2) Working papers, notes and drafts
3) Transitory and informal communications used to develop an official record, unless they are specifically required to be retained by the RMA, law or regulation
4) Stocks of publications and blank forms
5) Material intended solely for reference or exhibition
6) Material with no requirement for retention under the RMA

Non-records have no retention period and thus may be disposed of at any time unless they are responsive to a litigation hold or a Public Records Act request.

Record Retention and Disposition

The Board of Supervisors has authorized the RMA to develop and administer a comprehensive records management program. As part of this program, record retention schedules and disposition guidelines have been established. Record retention schedules must be initially approved by the Board of Supervisors and may be modified periodically thereafter upon approval by the RMA pursuant to County Code Section 2.32.370(B).

Record Retention

There are two types of records retention schedules - (1) General Records Retention Schedule and (2) Departmental Records Retention Schedule. Both schedules provide minimum retention periods for maintaining official County records. Once an official public

record has met its minimum retention period, the process of disposition should begin.

(1) General Records Retention Schedule (GRRS)
The GRSS provides retention periods for official public records found throughout departments countywide. The GRRS groups multiple records together by function and informational content. This allows for the consolidation of similar record types so they can share the same retention period. Any modification or addition to the GRRS must be approved by the submitting department's Department Head, their County Counsel and the RMA before the revised schedule goes into effect.

(2) Departmental Records Retention Schedule (DRRS)
A DRRS is issued by each individual County Department and sets forth retention periods for official public records exclusive to each department. Any modification or addition to the DRRS must be approved by the submitting department's Department Head, their County Counsel, and the RMA before the revised schedule goes into effect.

Records Not Included in a Retention Schedule

If a department identifies a document that may qualify as an official public record but is not found in the GRRS or a DRRS, it should consult with the RMA to determine whether that document type should be incorporated into the appropriate records retention schedule.

Record Disposition

Disposition refers to the final stage in the management of a record, where an official public record has met its retention period and must be destroyed.

Prior to the destruction of an official public record, the following criteria shall be considered:

- Is the record subject to a litigation hold or a Public Records Act request?
- Does the record have a specific administrative or fiscal function?
- Does the record have a specific historical/archival value?

Departments are to review their official public records periodically, including those stored with County contractors, and dispose of them in adherence to the applicable schedules provided that the record is not subject to any of the considerations stated above.

Litigation Hold and Public Records Request

Departments must not destroy any public record subject to a litigation hold or a Public Records Act request. All retention inquiries regarding legal holds or Public Records Act requests should be directed to County Counsel.

Administrative and Fiscal Value

A department may retain an official public record past its minimum retention period for operational purposes where it can demonstrate that the record meets an extraordinary administrative or fiscal need.

Historical/Archival Value

Official public records with archival value are to be preserved because they contain information of continuing and enduring value to the County, provide valuable research data, or document the history and development of the County and its departments. Archival records may be in any format and media, including paper, electronic, photographs, motion picture film, videos, and sound recordings.

Departments should appraise their official public records periodically, prior to destruction, to determine if the records possess any archival value that warrants permanent retention. Archival record guidelines shall be provided by RMA.

Retention of Vital Records

Departments will assist the RMA in identifying Vital Records. A Vital Record is essential for the ongoing operation of County Business.

Vital Records are those records that contain information critical to the operation of the County and require immediate recovery and access during or immediately following a natural disaster or other event disrupting normal operations. Such records include those that contain information protecting the County's legal/financial interests and status.

Departments should identify records specifically designated as Vital Records and include them as part of each department's disaster recovery and business continuity planning. Necessary steps should be taken to protect and safeguard those records to ensure availability.

Contracted Services that Store Official County Records and Non-Records

The County retention schedules apply to all records, regardless of medium, data and/or information that may be stored on purchased, leased, or rented electronic storage equipment and devices that are geographically located within the County, or external to the County's boundaries.

Departments will include prescriptive language in dealings/agreements with contractor(s) that maintain, process, and/or store record of the County to ensure that the data and information is appropriately destroyed in accordance with the County's record retention schedules and guidelines.

Contractor(s) must dispose of non-records as instructed by each individual department.

Policy Exceptions

There are no exceptions to this policy.

RESPONSIBLE DEPARTMENT

Registrar-Recorder/County Clerk

DATE ISSUED/SUNSET DATE

Issue Date: May 13, 1958
Review Date: July 22, 2004
Review Date: October 3, 2006
Review Date: July 23, 2010
Review Date: June 14, 2016
Review Date: July 18, 2018
Review Date: July 20, 2022
Review Date: June 15, 2026

Sunset Review Date: May 13, 2003
Sunset Review Date: May 13, 2006
Sunset Review Date: October 3, 2010
Sunset Review Date: October 3, 2014
Sunset Review Date: October 3, 2018
Sunset Review Date: October 3, 2022
Sunset Review Date: October 5, 2026
Sunset Review Date: October 7, 2030