

C-7: Administrative Procedures

Records Access and Management



REFERENCES

[Board Policy C-7](#)

[20 U.S.C. §1232\(g\) and \(h\), Federal Family Educational Rights and Privacy Act](#)

[Utah Code Ann. §20A-11-1205, Use of Public Email for a Political Purpose](#)

[Utah Code Ann. §53E-9-201 et seq., Student Privacy](#)

[Utah Code Ann. §63G-2-101 et seq., Government Records Access and Management Act](#)

[Utah Records Appraisal and Management Program \(RAMP\) Retention Schedule](#)

PROCEDURES FOR IMPLEMENTATION

I. Access to District Records

- A. Public access to district and board (collectively referred to as "district") records is governed by various state and federal laws including, but not limited to Utah's Government Records Access and Management Act ("GRAMA").
- B. Terms used in these administrative procedures have the meaning assigned to them in GRAMA including "record" and "record series." See, Utah Code Ann. §63G-2-103.
- C. Notwithstanding any other provision of these administrative procedures, the district shall not release or allow access to personally identifiable information in students' education records except as permitted under the federal Family Educational Rights and Privacy Act and/or Utah's Student Privacy and Data Protection Act. For more information about access to student records see Board Policy S-2: Student Records, Privacy Rights, and Release of Information, and its accompanying administrative procedures.

II. District Records Officer

- A. The district records officer shall perform the duties set forth in Utah Code Ann. §63G-2-103, including reviewing and responding to records requests.
- B. The district records officer delegates to principals or district department heads the responsibility of management of school or department records.

III. Records Classification

- A. Records will be evaluated and classified in accordance with Utah Code Ann. §63G-2-307 and §20-11-1205(7).
- B. Records shall be classified under the following general categories:
 1. public records as described in Utah Code Ann. §63G-2-301;
 2. private records as described in Utah Code Ann. §63G-2-302;
 3. controlled records as described in Utah Code Ann. §63G-2-304;
 4. protected records as described in Utah Code Ann. §63G-2-305; and
 5. limited records as described in Utah Code Ann. §63G-2-201(3)(b).

IV. Requests for Records

- A. A person making a records request shall furnish a written request containing his or her name, mailing address, daytime telephone number, and a reasonably specific description of the requested records. This request must be submitted to the district records officer and may be emailed to jillian.norton@slcschools.org, mailed to Salt Lake City School District, Attention District Records Officer, 406 East 100 South, Salt Lake City, UT 84111, or through the [Data, Public Records, & Research Requests form](#) on the district's website.
 1. The district will also accept GRAMA requests made through Utah's Open Records Portal accessible at <https://openrecords.utah.gov>.
- B. GRAMA requests that are received in a department or school should be forwarded immediately to the district records officer.
 1. Responses to GRAMA requests must only be sent from the district records officer or their designee.
 2. Employees with any questions about a particular request they have received should contact the district records officer.
- C. Fees will be charged for photocopying information at the rate of twenty cents per copy. Fees to cover actual costs will also be charged in accordance with Utah Code Ann. §63G-2-203. The fee will be forty-five dollars per hour.
 1. While GRAMA encourages the district to grant fee waivers in limited instances, there is no requirement that the district do so. See, Utah Code Ann. §63G-2-203.
 - a. In addition to a complete fee waiver, the district may also choose to grant only a partial fee waiver especially in circumstances where the only basis for the requested fee waiver is:
 - i. that the requester is the subject of the records request; and
 - ii. the request takes over two hours to fulfill.

- D. There is no requirement that a record be created in response to a request.
- E. The public's right to inspect a record and receive a copy of a record does not apply with respect to a record:
 - 1. a copy of which the district has already provided to the requesting individual;
 - 2. that is the subject of a records request that the district is not required to fill under Utah Code Ann. §63G-2-201(7)(a)(v); or
 - 3. that:
 - a. is accessible only by a computer or other electronic device owned or controlled by the district;
 - b. is part of an electronic file that also contains a record that is private, controlled, or protected; and
 - c. the district cannot readily segregate from the part of the electronic file that contains a private, controlled, or protected record.
- F. The district records officer, or designee, shall respond to records requests within the time frames set forth in Utah Code Ann. §63G-2-204.
- G. The district records officer, or designee, shall conduct a reasonable search for a requested record.
 - 1. A reasonable search is one that is reasonable in scope and intensity, and not unreasonably burdensome for the district.
- H. Private, controlled, protected, and limited records shall be disclosed only in accordance with Utah Code Ann. §63G-2-202.
- I. Public records will be disclosed in accordance with Utah Code Ann. §63G-2-201.
- J. Before releasing a record classified as private, controlled, or protected, evidence of the requester's identity must be obtained. A valid driver's license, passport, or a birth certificate, along with some form of picture identification, will be sufficient evidence of the requester's identification.

V. Sharing Records with Other Governmental Entities

The district may provide public, private, controlled, or protected records to another governmental entity in accordance with Utah Code Ann. §63G-2-206.

VI. Denial of Access to Records

If the records request, or any portion of the request, is denied, a written notice will be provided to the requester in accordance with Utah Code Ann. §63G-2-401.

VII. Appeals

- A. If a person has been denied either a fee waiver or access, in whole or in part, to a record that has been classified as private, controlled, or protected, that person may appeal the decision within 30 days of the denial by filing a notice of appeal with the district's chief administrative officer.
- B. If the district has delayed a response to a GRAMA request based on a claim of extraordinary circumstances, and the requester believes the extraordinary circumstances do not exist or that the date specified for the response is unreasonable, the requestor may appeal by filing a notice of appeal with the district's chief administrative officer within 30 days after notification of a claim of extraordinary circumstances.
- C. The notice of appeal must include the petitioner's name, mailing address, and daytime telephone number, and the relief sought. It may also contain a short statement of the facts, reasons, and legal authority in support of the appeal.
- D. The chief administrative officer will make a determination on the appeal within the time frame outlined in Utah Code Ann. §63-2-401. If a determination is not made within this time period, it will be considered the equivalent of an order denying the appeal.
- E. The time periods given in this section may be extended by agreement between those involved.
- F. If the denial is affirmed in whole or in part, notice will be sent to the petitioner advising that a further appeal may be made to the state records committee or district court in accordance with Utah Code Ann. §§63G-2-402, 403, and 404. Such appeal must be made within 30 days of the decision.

VIII. Amendment of Records

- A. An individual may contest the accuracy or completeness of a document pertaining to that individual pursuant to Utah Code Ann. §63G-2-603.
- B. Any such requests must be made in writing to the district records officer.
- C. Denial of a request to amend a record may be appealed following the appeals process given in Section VII above.
- D. This section does not apply to education records, medical records, title to real or personal property, or any other records that an administrator determines must be maintained in original form to preserve the integrity of the record system.

IX. Retention of Records

- A. Records must be retained, transferred, or disposed of in accordance with the applicable Utah Records Appraisal and Management Program ("RAMP") Utah Education Records Retention Schedule.

- B. The department or school records coordinator will appraise the record file in relation to the guidelines for record retention published by the district records officer and schedule an appropriate retention period for the record file, and also note what will be done with the record at the end of its retention period. If there is any doubt about the appropriate retention period, the district records officer should be contacted for assistance.

X. Responsibility for Records Management

- A. The records management function of the district will be the administrative responsibility of the district records officer.
- B. The administrator in charge of each department and school in the district will be administratively responsible for the records management function in his or her specific department or school. The administrator will designate one member of his or her staff as the department or school records coordinator. The records coordinator will be directly responsible for the care, maintenance, transfer, or disposal of the department or school records. The records coordinator will also keep the department or school current on these administrative procedures.
- C. The specific duties of the department or school records coordinator are to:
 - 1. Supervise the records management program within the specific department or school.
 - 2. Maintain a list of all records kept in the individual department or school, which includes the disposition or transfer schedule for each record. See Section IX.B.