



BALTIMORE CITY COUNCIL EQUITY AND STRUCTURE COMMITTEE

Mission Statement

On behalf of the Citizens of Baltimore City, the mission of the Equity and Structure Committee is to examine the current operating systems of our government, and to evaluate our policies and practices through a lens of equity in order to reduce systemic barriers in our processes and programs. In addition, this committee will conduct a thorough evaluation of the Charter Amendments that have been introduced. These Charter Amendments will address structural inequities, transparency and accountability to ensure sustainable government reform.

**The Honorable Bill Henry
Chairman**

PUBLIC HEARING

Thursday September 24, 2020

1:00 PM

Webex Virtual Hearing

Bill 20-0496

Records Management – Modernizing, Correcting, and Conforming

CITY COUNCIL COMMITTEES

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- *Larry Greene (pension only)*

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BILL SYNOPSIS

Committee: Equity and Structure

Bill 20-0496

Records Management – Modernizing, Correcting, and Conforming

Sponsor: The Council President

Introduced: February 24, 2020

Purpose:

For the purpose of repealing and replacing City Code provisions regarding Baltimore City records management program to conform to State law requirements and to reflect modern practices in records management; establishing the position of City Records Management Officer to coordinate citywide records management; setting forth certain duties of the City Records Management Officer; requiring City agencies to provide certain cooperation to the City Records Management Officer; providing for the manner of the proper disposal of certain City records; defining certain terms; and generally relating to the management of the records of Baltimore City government.

Effective: This ordinance takes effect on the 30th day after the date of enacted.

Agency Reports

Department of Law	Favorable with Amendments
Department of Finance	No objection
Department of Legislative Reference	Favorable
Employee Retirement System	No comment
Environment Control Board	Favorable with Comments
Department of Housing and Community Development	No Position
Office of the Comptroller	No Objections

Analysis

By repealing:

Article I – Mayor, City Council, and Municipal Agencies; Subtitle 10. City Records, in its entirety, and Subtitle 11. City Archivist and Records Management Officer, in its entirety; Baltimore City Code (2000 Edition)

By Adding:

Article I – Mayor, Council, and Agencies, Section(s) 10-1 to 10-12, to be under the new subtitle, “Subtitle 10. Records Management”; Baltimore City Code (2000 Edition)

Background

In 1954, the original Records Management program was enacted into law. In the last sixty-six years the law has only been amended once, and that was in 1978. Between then and now, there have been changes to the State law that affect the maintenance of local record management processes, as well as advancements in the technology used to store and reproduce those records. If enacted, Bill 20-0496 would bring Baltimore City in line with the State law in an effort to modernize our Records Management system.

This legislation also recodifies the position of Records Management Officer without the designation as City Archivist. The new legislation would update and outline the duties of the individual who will assume this position after being appointed by the Director of Legislative Reference. In Subtitle 11: City Archivist and Records Management Officer of the current City Code there was a records committee, and that group would be responsible for reviewing the records retention schedule, and resolving any questions in reference to the record management policies. Now, this legislation will make it the responsibility of the City’s Record Management Officer to adopt rules and regulations with respect to the retention, disposal, storage, and digitization of agency records, and file them with the Department of Legislative Reference in accordance with Subtitle 10: Records Management of the proposed legislation.

In the past, each agency created their own records retention schedule. Now, it would be the responsibility of each agency head to designate an individual within their organization as the “agency liaison” to the City Records Management Officer, and to be in compliance with the established record retention and disposition schedule on file with the Department of Legislative Reference. Seen below are the guidelines that must be followed in this legislation for the disposal of records.

10-10. Disposal of Records.

(E) Disposal of Records Held at the Records Storage Center.

- (1) AT LEAST 30 DAYS BEFORE ANY RECORDS HELD AT ANY CITY RECORDS STORAGE CENTER ADMINISTERED UNDER THIS SUBTITLE ARE DESTROYED, A LIST OF THE RECORDS PROPOSED FOR DESTRUCTION MUST BE SUBMITTED TO THE CITY SOLICITOR AND THE CITY AUDITOR FOR REVIEW.
- (2) AT ANY TIME DURING THE 30-DAY REVIEW PERIOD, THE CITY SOLICITOR OR THE CITY AUDITOR MAY SUBMIT TO THE CITY RECORDS MANAGEMENT OFFICER A WRITTEN OBJECTION TO THE DESTRUCTION OF A RECORD OR SET OF RECORDS ON THE LIST.

(3) ON RECEIPT OF A WRITTEN OBJECTION UNDER PARAGRAPH (2) OF THIS SUBSECTION, THE CITY RECORDS MANAGEMENT OFFICER MUST ORDER THE PROMPT DELIVERY OF THE RECORDS SPECIFIED IN THE OBJECTION TO THE CITY SOLICITOR OR THE CITY AUDITOR, AS THE CASE MAY BE.

Additional Information

Fiscal Note: Not Available

Information Source(s): Baltimore City Code, Agency Reports, Maryland State Code

Analysis by: Samuel Johnson
Analysis Date: September 8, 2020

Direct Inquiries to: (410) 396-1091

**CITY OF BALTIMORE
COUNCIL BILL 20-0496
(First Reader)**

Introduced by: The Council President

At the request of: The Administration (Department of Legislative Reference - Archives Division)

Introduced and read first time: February 24, 2020

Assigned to: Equity and Structure Committee

REFERRED TO THE FOLLOWING AGENCIES: City Solicitor, Department of Legislative Reference, Police Department, Baltimore Development Corporation, Department of Public Works, Department of Transportation, Department of Housing and Community Development, Department of Finance, Health Department, Baltimore City Parking Authority Board, Board of Liquor License Commissioners, Enoch Pratt Free Library, Housing Authority of Baltimore City, Office of the Comptroller, Department of General Services, Mayor's Office of Emergency Management, Baltimore City Information Technology, Fire Department, Department of Real Estate, Department of Human Resources, Office of the Mayor, Planning Commission, Planning Department, Department of Recreation and Parks, Office of the Labor Commissioner, Office of the Inspector General, Board of Municipal and Zoning Appeals, Commission for Historical and Architectural Preservation, Office of Civil Rights, Mayor's Office of Employment Development, Employees' Retirement System, Elected Officials' Retirement System, Fire and Police Employees' Retirement System, Minority and Women's Business Opportunity Office, Environmental Control Board

A BILL ENTITLED

1 AN ORDINANCE concerning

2 **Records Management – Modernizing, Correcting, and Conforming**

3 FOR the purpose of repealing and replacing City Code provisions regarding Baltimore City
4 records management program to conform to State law requirements and to reflect modern
5 practices in records management; establishing the position of City Records Management
6 Officer to coordinate citywide records management; setting forth certain duties of the City
7 Records Management Officer; requiring City agencies to provide certain cooperation to the
8 City Records Management Officer; providing for the manner of the proper disposal of certain
9 City records; defining certain terms; and generally relating to the management of the records
10 of Baltimore City government.

11 BY repealing

12 Article 1 - Mayor, City Council, and Municipal Agencies
13 Subtitle 10. City Records, in its entirety
14 Baltimore City Code
15 (Edition 2000)

EXPLANATION: CAPITALS indicate matter added to existing law.
[Brackets] indicate matter deleted from existing law.

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1 BY repealing
2 Article 1 - Mayor, City Council, and Municipal Agencies
3 Subtitle 11. City Archivist and Records Management Officer, in its entirety
4 Baltimore City Code
5 (Edition 2000)

6 BY adding
7 Article 1 - Mayor, Council, and Agencies
8 Section(s) 10-1 to 10-12, to be under the new subtitle,
9 “Subtitle 10. Records Management”
10 Baltimore City Code
11 (Edition 2000)

12 **SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE**, That
13 City Code Article 1, Subtitle 10 {“City Records”} and City Code Article 1, Subtitle 11 {City
14 Archivist and Records Management Officer”}, are repealed, in their entirety.

15 **SECTION 2. AND BE IT FURTHER ORDAINED**, That the Laws of Baltimore City read as
16 follows:

17 **Baltimore City Code**

18 **Article 1. Mayor, City Council, and Municipal Agencies**

19 **Subtitle 10. RECORDS MANAGEMENT**

20 **§ 10-1. DEFINITIONS.**

21 (A) *IN GENERAL.*

22 IN THIS SUBTITLE, THE FOLLOWING TERMS HAVE THE MEANINGS INDICATED.

23 (B) *AFFILIATED ENTITY.*

24 “AFFILIATED ENTITY” MEANS A GOVERNMENTAL OR QUASI-GOVERNMENTAL UNIT
25 MANAGED OR FUNDED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE, INCLUDING:

- 26 (1) BALTIMORE CITY PARKING AUTHORITY
27 (2) BALTIMORE CITY BOARD OF LIQUOR LICENSE COMMISSIONERS;
28 (3) BALTIMORE DEVELOPMENT CORPORATION;
29 (4) BALTIMORE POLICE DEPARTMENT;
30 (5) ENOCH PRATT FREE LIBRARY OF BALTIMORE CITY;
31 (6) HOUSING AUTHORITY OF BALTIMORE CITY;

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1 (7) LOCAL DEVELOPMENT COUNCIL, SOUTH BALTIMORE VIDEO LOTTERY
2 TERMINAL;

3 (8) PIMLICO COMMUNITY DEVELOPMENT AUTHORITY; AND

4 (9) SOUTH BALTIMORE GATEWAY COMMUNITY IMPACT DISTRICT MANAGEMENT
5 AUTHORITY.

6 (C) *AGENCY*.

7 “AGENCY” MEANS ANY DEPARTMENT, BOARD, COMMISSION, COUNCIL, AUTHORITY,
8 COMMITTEE, OFFICE, OR OTHER UNIT OF CITY GOVERNMENT OR OF ANY AFFILIATED
9 ENTITY.

10 (D) *INCLUDES; INCLUDING*.

11 “INCLUDES” OR “INCLUDING” MEANS BY WAY OF ILLUSTRATION AND NOT BY WAY OF
12 LIMITATION.

13 (E) *RECORD*.

14 (1) *IN GENERAL*.

15 “RECORD” MEANS ANY DOCUMENTARY MATERIAL IN ANY FORM CREATED OR
16 RECEIVED BY AN AGENCY IN CONNECTION WITH THE TRANSACTION OF PUBLIC
17 BUSINESS.

18 (2) *INCLUSIONS*.

19 “RECORD” INCLUDES:

20 (I) WRITTEN MATERIALS, EMAIL, BOOKS, PHOTOGRAPHS, PHOTOCOPIES,
21 PUBLICATIONS, FORMS, MICROFILMS, TAPES, COMPUTERIZED RECORDS, MAPS,
22 DRAWINGS, AND OTHER MATERIALS IN ANY FORMAT; AND

23 (II) DATA GENERATED, STORED, RECEIVED, OR COMMUNICATED BY ELECTRONIC
24 MEANS FOR USE BY, OR STORAGE IN, AN INFORMATION SYSTEM OR FOR
25 TRANSMISSION FROM ONE INFORMATION SYSTEM TO ANOTHER.

26 (3) *EXCLUSIONS*.

27 “RECORD” DOES NOT INCLUDE:

28 (I) EXTRA COPIES OF DOCUMENTS THAT:

29 (A) HAVE NO SEPARATE ADMINISTRATIVE PURPOSE OR VALUE; AND

30 (B) ARE PRESERVED ONLY FOR CONVENIENCE OR REFERENCE;

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1 (II) INFORMATIONAL COPIES OF CORRESPONDENCE, DIRECTIVES, FORMS, OR OTHER
2 SIMILAR DOCUMENTS ON WHICH NO ADMINISTRATIVE ACTION IS RECORDED OR
3 TAKEN;

4 (III) LIBRARY AND MUSEUM MATERIALS MADE OR ACQUIRED FOR REFERENCE OR
5 EXHIBITION PURPOSES;

6 (IV) PERSONAL PAPERS OR PAPERS OF A PRIVATE OR NON-OFFICIAL CHARACTER
7 THAT PERTAIN TO AN INDIVIDUAL'S PRIVATE AFFAIRS;

8 (V) DUPLICATE COPIES OF DOCUMENTS MAINTAINED IN THE SAME FILE;

9 (VI) EXTRA COPIES OF PRINTED OR PROCESSED MATERIALS FOR WHICH COMPLETE
10 RECORD SETS EXISTS, INCLUDING CURRENT AND SUPERCEDED MANUALS
11 MAINTAINED OUTSIDE THE AGENCY RESPONSIBLE FOR MAINTAINING THE
12 MANUAL;

13 (VII) CATALOGS, TRADE JOURNALS, AND OTHER PUBLICATIONS RECEIVED FROM
14 GOVERNMENT AGENCIES, COMMERCIAL FIRMS, OR PRIVATE INSTITUTIONS THAT
15 REQUIRE NO FURTHER ACTION BY THE AGENCY; OR

16 (VIII) PHYSICAL EXHIBITS, ARTIFACTS, AND OTHER MATERIAL OBJECTS LACKING
17 EVIDENTIAL VALUE.

18 (F) *RECORD INVENTORY*.

19 "RECORD INVENTORY" MEANS A SURVEY OF ALL RECORDS SERIES MAINTAINED BY AN
20 AGENCY RESULTING IN A DETAILED, ITEMIZED COMPILATION OF THE RECORDS IN THE
21 POSSESSION OF THAT AGENCY.

22 (G) *RETENTION PERIOD*.

23 "RETENTION PERIOD" MEANS THE PERIOD OF TIME THAT A RECORD MUST BE RETAINED IN
24 ACCORDANCE WITH AN APPROVED RECORDS RETENTION AND DISPOSITION SCHEDULE.

25 (H) *STATE ARCHIVIST*.

26 "STATE ARCHIVIST" MEANS THE INDIVIDUAL APPOINTED UNDER MARYLAND STATE
27 GOVERNMENT ARTICLE, § 9-1005, OR THAT INDIVIDUAL'S DESIGNEE.

28 **§ 10-2. MANDATORY, PROHIBITORY, AND PERMISSIVE TERMS.**

29 (A) *MANDATORY TERMS*.

30 "MUST" AND "SHALL" ARE EACH MANDATORY TERMS USED TO EXPRESS A REQUIREMENT
31 OR TO IMPOSE A DUTY.

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1 (B) *PROHIBITORY TERMS.*

2 "MAY NOT" AND "NO ... MAY" ARE EACH MANDATORY NEGATIVE TERMS USED TO
3 ESTABLISH A PROHIBITION.

4 (C) *PERMISSIVE TERMS.*

5 "MAY" IS PERMISSIVE.

6 **§§ 10-3 TO 10-4. {RESERVED}**

7 **§ 10-5. CITY RECORDS MANAGEMENT OFFICER: IN GENERAL.**

8 THERE IS A CITY RECORDS MANAGEMENT OFFICER APPOINTED BY THE DIRECTOR OF THE
9 DEPARTMENT OF LEGISLATIVE REFERENCE.

10 **§ 10-6. CITY RECORDS MANAGEMENT OFFICER: DUTIES.**

11 (A) *IN GENERAL.*

12 THE CITY RECORDS MANAGEMENT OFFICER SHALL DIRECT THE DEVELOPMENT AND
13 ADMINISTRATION OF A CONTINUING RECORDS MANAGEMENT, ARCHIVAL, AND DISPOSAL
14 PROGRAM FOR THE RECORDS OF ALL CITY AGENCIES.

15 (B) *SPECIFIC DUTIES.*

16 THE CITY RECORDS MANAGEMENT OFFICER MUST:

- 17 (1) ESTABLISH STANDARDS, PROCEDURES, AND TECHNIQUES FOR THE EFFECTIVE
18 MANAGEMENT OF CITY RECORDS;
- 19 (2) PREPARE, FOR THE APPROVAL OF THE STATE ARCHIVIST, RECORD RETENTION AND
20 DISPOSITION SCHEDULES PROVIDING FOR:
- 21 (I) THE RETENTION OF CITY AND AGENCY RECORDS OF CONTINUING VALUE FOR
22 A SPECIFIC RETENTION PERIOD; AND
- 23 (II) THE ORDERLY DISPOSAL OF CITY AND AGENCY RECORDS NO LONGER
24 POSSESSING SUFFICIENT ADMINISTRATIVE, LEGAL, FISCAL, OR HISTORICAL
25 VALUE TO WARRANT FURTHER PRESERVATION;
- 26 (3) REVIEW ALL PROPOSALS FOR THE DIGITIZATION OF RECORDS, WHETHER OR NOT
27 THE ULTIMATE DESTRUCTION OF THE ORIGINAL RECORD IS INVOLVED;
- 28 (4) ASSIST AGENCY HEADS IN THE PREPARATION OF AGENCY RECORD INVENTORIES;
- 29 (5) PERIODICALLY INSPECT RECORDS AND RECORDS MANAGEMENT PRACTICES OF
30 AGENCIES; AND

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1 (6) ORGANIZE AND ADMINISTER A CITY RECORDS STORAGE CENTER OR CENTERS FOR
2 THE CITY'S INACTIVE AND HISTORICAL RECORDS.

3 (C) *RULES AND REGULATIONS.*

4 (1) *IN GENERAL.*

5 THE CITY RECORDS MANAGEMENT OFFICER MUST ADOPT RULES AND REGULATIONS
6 TO CARRY OUT THIS SUBTITLE.

7 (2) *FILING WITH LEGISLATIVE REFERENCE.*

8 A COPY OF ALL RULES AND REGULATIONS ADOPTED UNDER THIS SUBTITLE MUST BE
9 FILED WITH THE DEPARTMENT OF LEGISLATIVE REFERENCE BEFORE THEY TAKE
10 EFFECT.

11 **§§ 10-7 TO 10-8. {RESERVED}**

12 **§ 10-9. DUTIES OF AGENCIES.**

13 EACH AGENCY HEAD MUST:

14 (1) DESIGNATE AN AGENCY RECORDS OFFICER TO:

15 (I) SERVE AS THE AGENCY LIAISON TO THE CITY RECORDS MANAGEMENT OFFICER;
16 AND

17 (II) ASSIST THE CITY RECORDS MANAGEMENT OFFICER IN CARRYING OUT THE
18 RECORDS MANAGEMENT PROGRAM FOR THE AGENCY;

19 (2) ON THE REQUEST OF THE CITY RECORDS MANAGEMENT OFFICER, PREPARE A RECORD
20 INVENTORY;

21 (3) COOPERATE WITH THE CITY RECORDS MANAGEMENT OFFICER IN THE PREPARATION
22 OF RECORD RETENTION AND DISPOSITION SCHEDULES FOR THE AGENCY HEAD'S
23 AGENCY; AND

24 (4) COMPLY WITH THE RULES AND REGULATIONS ADOPTED BY THE CITY RECORDS
25 MANAGEMENT OFFICER WITH RESPECT TO THE RETENTION, DISPOSAL, STORAGE, AND
26 DIGITIZATION OF AGENCY RECORDS.

27 **§ 10-10. DISPOSAL OF RECORDS.**

28 (A) *SCOPE OF SECTION.*

29 NOTHING IN THIS SECTION APPLIES TO ANY RECORD THAT HAS BEEN TRANSFERRED TO THE
30 CUSTODY OF THE MARYLAND STATE ARCHIVES.

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1 (B) *IN GENERAL.*

2 EXCEPT AS PROVIDED IN THIS SECTION OR IN AN APPROVED RECORD RETENTION AND
3 DISPOSITION SCHEDULE, RECORDS CREATED OR RECEIVED BY AN AGENCY IN THE COURSE
4 OF OFFICIAL CITY BUSINESS ARE THE PROPERTY OF THE MAYOR AND CITY COUNCIL OF
5 BALTIMORE AND MAY NOT BE DESTROYED, SOLD, TRANSFERRED, OR OTHERWISE
6 DISPOSED.

7 (C) *AGENCY COMPLIANCE.*

8 EACH AGENCY MUST COMPLY WITH ITS RECORD RETENTION AND DISPOSITION SCHEDULE
9 TO ENSURE:

10 (1) THE ORDERLY RETENTION OF RECORDS REQUIRED FOR THE OPERATION OF THE
11 AGENCY; AND

12 (2) THE PROMPT DISPOSAL OF RECORDS HAVING NO FURTHER VALUE.

13 (D) *AGENCY CERTIFICATE OF DISPOSAL.*

14 (1) AN AGENCY HEAD MUST SUBMIT A CERTIFICATE OF DISPOSAL TO THE CITY RECORDS
15 MANAGEMENT OFFICER FOR ANY RECORD DISPOSED OF IN ACCORDANCE WITH THE
16 AGENCY'S RECORD RETENTION AND DISPOSITION SCHEDULE.

17 (2) THE CERTIFICATE OF DISPOSAL REQUIRED BY THIS SECTION MUST SET FORTH A LIST OF
18 THE DISPOSED RECORDS AND A CERTIFICATION THAT THE RECORDS WERE DISPOSED OF
19 IN ACCORDANCE WITH THIS SUBTITLE.

20 (3) THE CITY RECORDS MANAGEMENT OFFICER SHALL TRANSMIT A COPY OF ANY
21 CERTIFICATE OF DISPOSAL RECEIVED UNDER THIS SUBSECTION TO THE STATE
22 ARCHIVIST.

23 (E) *DISPOSAL OF RECORDS HELD AT A RECORDS STORAGE CENTER.*

24 (1) AT LEAST 30 DAYS BEFORE ANY RECORDS HELD AT ANY CITY RECORDS STORAGE
25 CENTER ADMINISTERED UNDER THIS SUBTITLE ARE DESTROYED, A LIST OF THE
26 RECORDS PROPOSED FOR DESTRUCTION MUST BE SUBMITTED TO THE CITY SOLICITOR
27 AND THE CITY AUDITOR FOR REVIEW.

28 (2) AT ANY TIME DURING THE 30-DAY REVIEW PERIOD, THE CITY SOLICITOR OR THE CITY
29 AUDITOR MAY SUBMIT TO THE CITY RECORDS MANAGEMENT OFFICER A WRITTEN
30 OBJECTION TO THE DESTRUCTION OF A RECORD OR SET OF RECORDS ON THE LIST.

31 (3) ON RECEIPT OF A WRITTEN OBJECTION UNDER PARAGRAPH (2) OF THIS SUBSECTION,
32 THE CITY RECORDS MANAGEMENT OFFICER MUST ORDER THE PROMPT DELIVERY OF
33 THE RECORDS SPECIFIED IN THE OBJECTION TO THE CITY SOLICITOR OR THE CITY
34 AUDITOR, AS THE CASE MAY BE.

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1 **§ 10-11. RECORDS OF HISTORICAL SIGNIFICANCE.**

2 (A) *IN GENERAL.*

3 ANY CITY RECORD DEEMED BY THE CITY RECORDS MANAGEMENT OFFICER TO BE
4 HISTORICALLY SIGNIFICANT MUST BE TRANSFERRED TO THE CUSTODY OF THE DIRECTOR
5 OF THE DEPARTMENT OF LEGISLATIVE REFERENCE FOR PROPER PRESERVATION, INDEXING,
6 AND AVAILABILITY FOR RESEARCH PURPOSES.

7 (B) *TRANSFER TO THE STATE ARCHIVES AUTHORIZED.*

8 THE DIRECTOR OF THE DEPARTMENT OF LEGISLATIVE REFERENCE MAY, IN HIS OR HER
9 DISCRETION, TRANSFER AN ORIGINAL OR COPY OF ANY RECORD RECEIVED UNDER THIS
10 SECTION TO THE STATE ARCHIVES.

11 **§ 10-12. DIGITIZATION.**

12 AS PROVIDED IN CITY CHARTER ARTICLE I, § 7(B), ANY AGENCY MAY SUBSTITUTE A DIGITAL
13 IMAGE OR FILE FOR ANY OF ITS RECORDS, PROVIDED THAT:

14 (I) THE REQUIRED RECORD RETENTION AND DISPOSITION SCHEDULE HAS BEEN
15 APPROVED; AND

16 (II) ANY DIGITAL SURROGATES HAVE BEEN PRODUCED IN A MANNER CONSISTENT WITH
17 THE RULES AND REGULATIONS ADOPTED UNDER THIS SUBTITLE.

18 **SECTION 2. AND BE IT FURTHER ORDAINED,** That the catchlines contained in this Ordinance
19 are not law and may not be considered to have been enacted as a part of this or any prior
20 Ordinance.

21 **SECTION 3. AND BE IT FURTHER ORDAINED,** That this Ordinance takes effect on the 30th day
22 after the date it is enacted.

**EQUITY AND STRUCTURE
COMMITTEE**

AGENCY REPORTS

CITY OF BALTIMORE

BERNARD C. "JACK" YOUNG
Mayor



DEPARTMENT OF LAW
DANA P. MOORE, ACTING CITY SOLICITOR
100 N. HOLLIDAY STREET
SUITE 101, CITY HALL
BALTIMORE, MD 21202

September 4, 2020

The Honorable President and Members
of the Baltimore City Council
Room 409, City Hall
100 N. Holliday Street
Baltimore, Maryland 21202

Re: City Council Bill 20-0496 – Records Management – Modernizing,
Correcting, and Conforming

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 20-0496 for form and legal sufficiency. The bill would repeal the current Subtitles 10 (City Records) and 11 (City Archivist and Records Management Officer) of Article 1 of the City Code and replace them with new Sections 10-1 through 10-12 of Article 1 concerning records. The bill would create a City Records Management Officer position appointed by the Director of Legislative Reference that would work with Record Officers appointed by each City agency, in order to create record retention schedules for those agencies. The City Records Management Officer must adopt rules and regulations to carry out the requirements of this bill. In addition, the City Records Management Officer position would offer those record retention schedules to the State Archivist for approval, as required in state law. The bill would also set forth how records could be destroyed, preserved and archived.

Applicable State Laws on Records

Maryland state law puts record requirements on all public officials, which includes every government elected official and employee including local government officials. Md. Code, State Gov.'t, §§ 10-614(d). Records are defined by state law to mean "any documentary material in any form created or received by any agency in connection with the transaction of public business." Md. Code, State Gov.'t, § 10-614(e). This includes all paper records and electronic records, including emails, text messages, voice mails and hard drives. COMAR 14.18.02.02.B.9(b). It also includes legislation, plats, maps, and portraits. COMAR 14.18.02.02.

Destruction of government records is not permitted unless it is done in accordance with a record retention schedule approved by the Maryland State Archivist. Md. Code, State Gov.'t, § 10-615(4), (5); COMAR 14.18.02.05.B. A City record retention schedule is not official until it is approved by the State Archivist. COMAR 14.18.02.07.C(6). Once a record is no longer needed by the City and ready for destruction, it must be offered first to the State Archivist for that office to determine if it wants to keep the record. Md. Code, State Gov.'t, § 10-616(a). If the State Archivist declines to preserve the record it will send written approval permitting destruction. Md. Code, State Gov.'t, § 10-616(c). Once that written approval is received, the record may be

destroyed but a certificate of that destruction must be sent back to the State Archivist. Md. Code, State Gov.'t, § 10-616(c)(2); COMAR 14.18.02.15. There are special state rules for reproductions of records (by electronic copy or microfilm, for example) but those also require prior consultation with the State Archivist. Md. Code, State Gov.'t, § 10-619.

Amendments required in this bill to conform to State Law

There are several sections of the bill that must be amended to comply with existing state laws.

Affiliated Entities

First, the bill attempts to legislate the record practices of “affiliated entities,” most of which are not part of the Mayor and City Council of Baltimore. The Baltimore City Police Department is a state entity and the City is expressly forbidden from enacting laws that interfere with the Powers of the Police Commissioner. Code of Public Local Laws of Baltimore City, §§ 16-2; 16-7(13) (Police Commissioner responsible for record management and destruction); City Charter, Art. II, § (27).

The Baltimore City Board of Liquor License Commissioners is a state entity and the provisions in state law do not give local governments control over the liquor boards, but rather have given the local boards power to create their own rules and regulations governing their operations. Md. Code, Alch. Bev., §§ 1-201; 12-201; 12-210; *Coalition for Open Doors v. Annapolis Lodge No. 622*, 333 Md. 359, 373 (1994); Md. Code, Gen. Prov., §§ 5-103 (defining local liquor boards as subject to local ethics rules); 5-807.

Similarly, the Housing Authority of Baltimore City is a separate legal entity that has power to make its own rules and regulations and carry out its state given power. Md. Code, Hous & Cmty Dev., §§ 15-102, 15-104; 12-502.

The Enoch Pratt Free Library is the creature of an 1882 testamentary gift of library collections and funds. 1882 Md. Laws, ch. 181. “The title to said Library, its branches, books, and all other property, to be vested in the Mayor and City Council of Baltimore, the control and management of the said Library and other property to be in said Board of Trustees[.]” *Id.* This state law gave the Library’s Board of Trustees the power “to do all necessary things for the control and management of said Library and its branches.” This state law contemplated a local ordinance (1882 City Ordinance 106) to form the corporation, accept Pratt’s donation and the terms of his annuity and other obligations. The Ordinance was approved by the voters of the City of Baltimore in October of 1882. It is now codified as Article 18, Subtitle 7 of the Baltimore City Code. *See also* Subtitle 17 of the Public Local Laws. Despite its presence in the City Code, it has been deemed an instrumentality of the State of Maryland “operated by a self [-] perpetuating board of trustees to safeguard it from political manipulation.” *Kerr v. Enoch Pratt Free Library of Baltimore City*, 149 F.2d 212, 216, 219 (4th Cir. 1945), *cert. denied*, 326 U.S. 721 (1945). The library is “a private endeavor subsidized with government funds.” 62 Opinions of the City Solicitor at 399, 401 (1970); *accord* 77 Opinions of the City Solicitor 32, 35 (1985) (Enoch Pratt Free Library is not a city agency and therefore is not required to comply with provisions of the Baltimore City Administrative Manual).

The Baltimore Development Corporation is a not-for-profit corporation. *City of Baltimore Development Corporation v. Carmel Realty Associates*, 395 Md. 299, 308 (2006). Although it was declared to be subject to Maryland's Public Information and Open Meetings' Act, it is not clear that the City is able to legislate its internal operations. There are no local laws that regulate this entity, except for the City's Ethics law, which is authorized and required by state law. Md. Code, Gen. Prov., §§ 5-103); 5-807.

The Pimlico Community Development Authority is a state created entity that exists to receive certain video lottery terminal revenues. 2005 Md. Laws, ch. 603; Md. Code, Bus. Reg. §11-1201, *et. seq.*; Md. Code, State Gov., § 9-1A-31(a)(3)(ii). It is the local development council for the Pimlico area responsible for partnering with the local government to plan for the expenditure of local grant funds. Md. Code, State Gov., § 9-1A-31(a)(3)(ii). It is clearly separate from the local government.

The Local Development Council of the South Baltimore Video Lottery Terminal, also known as the "Baltimore Casino Local Development Council (LDC)" is the local development council that must partner with the City to plan for the expenditure of local grant funds for the area near the Horseshoe casino. Md. Code, State Gov., § 9-1A-31(d)(1); *see also* https://baltimoreldc.files.wordpress.com/2018/10/ldc_operatingprocedures_revised_161101.pdf . Just as with the Pimlico Community Development Authority, it was created by state law to be separate from the local government. Rather, the local government that must "submit the plan to the local development council for review and comment before adopting the plan or expending any grant funds" and in turn, the "local development council shall advise the county or municipality." Md. Code, State Gov., § 9-1A-31(d)(2), (3).

The South Baltimore Gateway Community Impact District Management Authority is an entity created pursuant to specific state authority and is specifically not an agency of the Mayor and City Council of Baltimore. City Charter, Art. II, § (69)(e)(1)(viii); *Kimball-Tyler Co. v. Baltimore*, 214 Md. 86, 94 (1957) (Article II of the City Charter is state law, and constitutes powers granted to the City by the General Assembly and can only be modified by it); *accord* 87 Op. Atty Gen. Md. 187, 191, n. 8 (2002). It is chiefly designed as a recipient of certain local impact grants from gaming revenue. Md. Code, State Gov., § 9-1A-31(b)(3)(i). It was made expressly subject to certain city procurement laws but in all other respects was given power to do all things necessary to carry out its powers, including adopting its own by-laws. City Charter, Art. II, § (69)(d).

Finally, the Parking Authority is a creature of both City and State law, although it is not an agency of the Mayor and City Council of Baltimore. Md. Code, Local Gov't, § 18-101, *et. seq.*; City Code, Art. 13-6(a). While the City Council is given some legislative control over the entity, it is unclear if that would extend to record retention practices. Md. Code, Local Gov't, §§ 18-104, 18-108, 18-109.

Even if these entities were removed from the bill, it does not change any of those entities' existing responsibilities under state law. Md. Code, State Gov.'t, §§ 10-614(d). Rather, this change just reflects the limits of the City's ability to legislate with respect to these non-City entities. An amendment to this effect is attached.

Definition of Agency

Next, while the bill attempts to define “agency” broadly, it is a term that is generally associated with the executive and not legislative branches. Since the state record retention laws apply to all public officials, which would include all elected officials, and all those in the City Council and Board of Estimates, it might be best to enumerate those within the bill to be clear that this law is intended to cover them. An amendment to this effect is attached.

Definition of Record

Next, the bill defines “record” to exclude several types of documents like extra copies or correspondence “on which no administrative action is recorded.” This definition does not comport with the state definition of a record, which captures all “documentary material in any form created or received by any agency in connection with the transaction of public business.” Md. Code, State Gov.’t, § 10-614(e). State regulations further clarify that while the term “record” is to encompass every document associated with public business, some records may be considered permanent or non-permanent. COMAR 14.18.02.02.B.9(b). The designation of permanent and non-permanent records can be made by local law. COMAR 14.18.02.02.B.6-7. However, all records are to be included in record retention schedules. COMAR 14.18.02.02.B.13. The bill should be amended to rename those records listed now as “exclusions” to be instead those that the City believes should be designated as non-permanent records in accordance with state law. This will insure that the City’s definition comports with state law and that its record schedules cover all records. An amendment to this effect is attached.

Conforming to State Disposal Process

The bill also creates a process for the disposal of City records in Section 10-10. The bill is careful to note that it does not apply to any record that has been accepted by the State Archivist. However, the bill does not reference the state law requirement that all records no longer needed must be offered to the State Archives first and then only destroyed if the State Archivist declines to accept the record. Md. Code, State Gov.’t, § 10-616. The bill should be amended to reflect that the process for disposal set forth in Section 10-10 is in addition to this state law. An amendment to this effect is attached.

City Solicitor and Auditor Objections to Destruction

The bill provides that the City Solicitor and the City Auditor be given thirty days’ notice before the destruction of records in the City storage center. If either object, the record is then delivered to the City Solicitor or City Auditor instead of being destroyed. It is unclear why the record that arguably should be kept would be delivered to the City Solicitor or Auditor instead of remaining in the City storage center. Additionally, the records to be destroyed may be covered by confidentiality, privilege or other requirements that make them unable to be shared with the City Auditor; for example, personnel files. Md. Code, Gen. Prov., §§ 4-311; 4-202; *Montgomery County v. Shropshire*, 420 Md. 362, 383 (2011) (the PIA applies between the government and a third party as well as between record custodians within the same government). Thus, it would be better to retain those records in the City Storage center. An amendment to effectuate this change is attached.

Records of Historical Significance

Section 10-11 provides that the City Records Management Officer can deem any record to be of historical significance and transferred to the Director of Legislative Reference. While the intent was likely to capture only records that are no longer being utilized by an agency, the bill should be amended to make this clarification. This Section also appears slightly out of place as the determination of which records are of historical significance would likely take place in the adoption of agency retention and disposition schedules, in consultation with the agency head. Moreover, no City entity can simply require the State Archivist to take a record that the City deems to be of historical importance because state law gives the option to do so to the State Archivist. To rectify these issue, it is best to put this historical preservation piece within the regular duties of the City Records Management Officer to be clear that records of historical importance be addressed in record retention schedules and offered to the State Archives in accordance with state law. An amendment to this effect is attached.

Assuming the bill is amended as noted above, the Law Department can approve it form and legal sufficiency.

Very truly yours,



Hilary Ruley
Chief Solicitor

cc: Dana P. Moore, Acting City Solicitor
Matthew Stegman, Mayor's Office of Government Relations
Caylin Young, President's Legislative Director
Elena DiPietro, Chief Solicitor
Victor Tervalá, Chief Solicitor
Ashlea Brown, Assistant Solicitor

AMENDMENTS TO COUNCIL BILL 20-0496
(1st Reader Copy)

Proposed by: Law Dep't

Amendment No. 1 – removing references to affiliated entities

On page 2, delete lines 23 through 31. On page 3, delete lines 1 through 5. On page 3, in line 8 and 9, delete “OR OF ANY AFFILIATED ENTITY”

Amendment No. 2 – broadening the definition of “agency”

On page 3, in line 8, after “GOVERNMENT” insert “INCLUDING ALL IN THE EXECUTIVE AND LEGISLATIVE BRANCHES, AND ALL ELECTED OFFICIALS”

Amendment No. 3 – changing “excluded” records to “non-permanent” records

On page 3, in line 26, delete “EXCLUSIONS” and substitute “NON-PERMANENT RECORDS” and on page 3, in line 27, before “RECORD” insert “NON-PERMANENT” and in the same line delete “DOES NOT” and add an “s” after “INCLUDES”

Amendment No. 4 – conforming City disposal process to State requirements

On page 7, in line 8, after “SCHEDULE” insert “AND THE DISPOSAL PROCESS, CURRENTLY CODIFIED IN SUBTITLE 6 OF TITLE 10 OF THE STATE GOVERNMENT ARTICLE OF THE MARYLAND CODE”

Amendment No. 5 – keeping records at City Storage Center when Solicitor or Auditor objects

On page 7, in lines 32 through 34, delete “ORDER THE PROMPT DELIVERY OF THE RECORDS SPECIFIED IN THE OBJECTION TO THE CITY SOLICITOR OR THE CITY AUDITOR, AS THE CASE MAY BE” and substitute “RETAIN THE RECORD”

Amendment No. 6 – clarifying the designation of records of historical significance is part of the regular duties of the City Records Management Officer and part of the require record schedules

On page 8, delete lines 1-10 in their entirety; and on page 8 in line 11 delete “10-12” and substitute “10-11”; and on page 5 in line 22, delete “AND”; and on page 5, at the end of line 25 after the semi-colon, insert “AND”; and in the “(III) THE IDENTIFICATION AND PRESERVATION OF RECORDS NO LONGER NEEDED BY AN AGENCY THAT ARE OF HISTORICAL SIGNIFICANCE;”

BaltAC

FROM	NAME & TITLE	Robert Cename, Budget Director	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Bureau of the Budget and Management Research Room 432, City Hall (410) 396-4774		
	SUBJECT	City Council Bill 20-0496—Records Management- Modernizing, Correcting, and Conforming		

DATE:

TO

The Honorable President and
Members of the City Council
City Hall, Room 400

August 25, 2020

Position: Does Not Oppose

The Department of Finance is herein reporting on City Council Bill 20-0496, Records Management-Modernizing, Correcting, and Conforming, the purpose of which is to update City code related to records management and archive procedures to reflect State requirements and modern best practices.

Background

The City code currently includes provisions related to records management, as well as a Records Management Officer position. This legislation is intended to update the current provisions to conform to State requirements and align with best practices. These provisions include enabling the City Records Management Officer to establish rules and regulations with regards to the retention, disposal, storage, and digitization of City records, as well as processes and procedures agencies must follow related to record retention and disposition.

Fiscal Impact


The Department of Finance estimates that this legislation will have no fiscal impact for the City, since there are no additional staffing or equipment requirements.

Conclusion

This legislation will align the City's current records management program with State requirements and best practices.

For the reasons stated above, the Department of Finance does not oppose City Council Bill 20-0496.

cc: Henry Raymond
Matthew Stegman
Nina Themelis

FROM	NAME & TITLE	David Randall, Executive Director <i>David Randall</i>	CITY of BALTIMORE MEMO	
	AGENCY NAME & ADDRESS	Employees', Elected Officials, Retirement Savings Plan Systems 7 E Redwood Street, 12 th Floor		
	SUBJECT	City Council Bill 20-0496-Records Management Modernizing, Correcting, and Conforming		

TO

March ^{DATE:} 4, 2020

The Honorable President and Members of the Baltimore City Council
 Attn: Matawan B. Austin, Executive Secretary
 Room 409, City Hall
 100 N. Holiday Street
 Baltimore, MD 21202

Dear Mr. President and City Council Members:

City Council Bill 20-0496 has been referred to the Employees' Retirement System, the Elected Officials Retirement System (ERS and EOS) and the Retirement Savings Plan (RSP) for comment. The Bill's stated purpose is for "the Baltimore City records management program to conform to State law requirements and to reflect modern management practices in records management; establishing the position of City Records management Officer to coordinate citywide records management ;setting forth certain duties of the City Records Management Officer; requiring City agencies to provide certain cooperation to the City Records management Officer, providing for the manner of proper disposal of certain City records; defining certain terms; and generally relating to the management of the records of Baltimore City government."

The Employees' Retirement System, the Elected Officials' system and the Retirement Savings Plan has no comment on the Bill.

Please call me at 443-984-3180 if you would like additional information.

Cc: Henry Raymond, Board Chairman
 Nichelle Lashley, Deputy Director

FROM

NAME & TITLE	Rebecca Woods, Esq., Executive Director <i>RW</i>
AGENCY NAME & ADDRESS	Environmental Control Board 1 North Charles Street, 13 th Floor, Baltimore, Maryland 21201
SUBJECT	City Council Bill # 20-0496 Records Management – Modernizing, Correcting, and Conforming

CITY OF
BALTIMORE
MEMO



TO

The Honorable President and Members
of the Baltimore City Council

DATE: March 3, 2020

The Baltimore City Environmental Control Board (ECB) has been requested to review City Council Bill # 20-0496, Records Management – Modernizing, Correcting, and Conforming. The purpose of the bill is to repeal and replace City Code provisions regarding Baltimore City’s records management program to conform to State law requirements and to reflect modern practices in records management, to establish the position of City Records Management Officer to coordinate citywide records management, to set forth certain duties of the City Records Management Officer, to require City agencies to provide certain cooperation to the City Records Management Officer, to provide for the manner of the proper disposal of certain City records, to define certain terms, and generally relating to the management of the records of Baltimore City government.

The ECB is an administrative hearing board that is responsible for the adjudication of citations issued by other agencies that affect sanitation, environmental, health, safety, and other quality of life issues. The ECB generally only addresses citations that are brought to its attention by a cited person, entity, or an interested third party. Due to this, unless a request is made of the agency, the ECB would have no real knowledge of any particular citation and would not be in possession of that citation’s underlying records.

In office, the ECB maintains all physical hearing files from 2016 to present, the review packets for our annual tax sale review process, and specific to the Board meetings, the audio recordings for the Board, the meeting minutes, the agendas, and any appeal opinions. Digitally, the ECB keeps audio recordings for all hearings and scanned copies of mailed or faxed correspondence in a secure drive. The ECB also maintains emails from the Environmental Control Board email inbox, which are archived on that secure drive as well.

Any and all files prior to 2016 are kept at an off-site facility, with the exception of personnel files. All personnel files, regardless of time frame, are kept in office.

The ECB is also home to the BMORE Beautiful peer-to-peer community beautification program. The only records retained with regard to that program are in relation to the grants

While the ECB is in favor of City Council Bill # 20-0496, the impact on this agency is unclear. Pursuant to §10-9 of the proposed bill, the ECB's required Agency Records Officer would prepare a record inventory, prepare a Record Retention and Disposition Schedule, and ensure compliance with the rules and regulations adopted by the City Records Management Officer. That compliance is further detailed in §10-10(c), which merely stresses compliance with the Record Retention and Disposition Schedule.

The reason the impact on the ECB is unclear, despite the above noted responsibilities, is because the proposed bill does not detail *how* those responsibilities would need to be carried out. Without knowing the specific requirements under the rules and regulations and/or the Record Retention and Disposition Schedule, there is no way to know what steps would need to be taken in order to be in compliance.

MEMORANDUM

To: The Honorable President and Members of the Baltimore City Council
c/o Natawna Austin, Executive Secretary

From: Alice Kennedy, Acting Housing Commissioner *AK*

Date: August 27, 2020

Re: City Council Bill 20-0496 Records Management – Modernizing, Correcting, and Conforming

The Department of Housing and Community Development (DHCD) has reviewed City Council Bill 20-0496 for the purpose of repealing and replacing City Code provisions regarding Baltimore City records management program to conform to State law requirements and to reflect modern practices in records management; establishing the position of City Records Management Officer to coordinate citywide records management; setting forth certain duties of the City Records Management Officer; requiring City agencies to provide certain cooperation to the City Records Management Officer; providing for the manner of the proper disposal of certain City records; defining certain terms; and generally relating to the management of the records of Baltimore City government.

If enacted the Bill would establish a City Records Management Officer who shall direct the development and administration of a records management, archival and disposal program for the records of all City agencies. DHCD would be required to designate an Agency Records Officer, to serve as the liaison to the City Records Management Officer, who will assist them in carrying out the program for the agency and at the request of the Officer; prepare a record inventory, cooperate in the preparation of record retention and disposition schedules and comply with the rules and records to be adopted.

Record is defined in the Bill as any documentary material in any form created or received by the agency in connection with the transaction of public business. This includes written materials, emails, books, photographs, photocopies, publications, forms, microfilms, tapes, computerized records, maps drawings and other materials in any format. Records also includes data generated, stored, or received, or communicated by electronic means for use by, or storage in, an information system for transmission from one information system to another. There are a number of “Record” exclusions laid out in the Bill, such as extra copies of documents.

DHCD maintains various files across its Divisions related to development projects, homeownership and housing preservation activities, research and planning data, housing & code enforcement actions, emergency operations activities, permits and litigation proceedings, and various community service requests.

DHCD currently maintains files in physical and electronic format and all Records such as notices, citations and permits are already publicly available, archived and accessible, through Code Map 2.0 or other digital portals. Digital records are managed electronically by DHCD's Division of Information and Technology through oversight of various online platforms, both public facing and internal.

DHCD is in favor of modernizing records management and supportive of transparency in government, but the impact on the agency is unclear. Additional staff would likely be needed in each of DHCD's Divisions to coordinate with DHCD's Agency Records Officer to meet reporting requirements. It is highly likely that additional investment in technology will be needed to fulfil the purpose of the legislation, as well. Also, DHCD and other agencies would need detailed guidance on implementation from the Law Department, specifically as DHCD records can contain private, sensitive or protected material; thus, drawing on resources of that agency and increasing cost of implementation. Finally, carrying out the Bill will be further compounded, and made more expensive if implemented during the period of the COVID crisis. While it is difficult to precisely anticipate the extent of the impact on the agency and associated costs, the bill represents a large-scale unfunded mandate with unpredictable implications.

DHCD takes no position on the Bill and will defer to the Law Department and Administration. DHCD recommends consideration be given to an amendment to 20-0496 providing for a study period to determine the feasibility of the bill and a schedule for implementation beginning at least 180 days after enactment to allow for agency planning.

DHCD takes **no position** on City Council Bill 20-0496.

sm

cc: Mr. Blendy, Nicholas, *Mayor's Office of Government Relations*

COMPTROLLER

JOAN M. PRATT, CPA
Room 204, City Hall
Baltimore, Maryland 21202-3461



OFFICE OF THE COMPTROLLER

Department of Audits
Department of Real Estate
Municipal Post Office
Municipal Telephone Exchange
Harbor Master

September 9, 2020

The Honorable President and Members
of the Baltimore City Council
Attn.: Natawna B. Austin, Executive Secretary
Room 409, City Hall
100 N. Holliday Street
Baltimore, MD 21202

Re: City Council Bill 20-0496, "Records Management—Modernizing, Correcting and Conforming"

Dear Mr. President and Members, Baltimore City Council:

The Comptroller's Office and the Department of Real Estate have reviewed City Council Bill 20-0496; this impact statement applies to Comptroller's Office and all its constituent units including the Department of Real Estate. This bill would repeal the current provisions of City Code Article 1 relating to City Records and the City Archivist and Records Manager and replace them with a new Subtitle 10 ("Records Management"). The bill would establish an overall definition of "records", create the position of City Records Management Officer, specify the Records Management Officer's duties, and require City agencies to work with the Records Management Officer regarding maintenance and disposal of records under their control.

The Office of the Comptroller and the Department of Real Estate have no objection to Council Bill 20-0496. These agencies offer the following comments to the Committee for its consideration. The requirement on page 7, lines 23 through 34, that the City Auditor review lists of records proposed for destruction 30 days in advance is a prudent measure that could protect records needed for an investigation. Also, if Council Bill 20-0496 were enacted, it would be beneficial for the Records Management Officer to work closely with agencies when developing regulations relating to retention of specific types of documents. Finally, the Department of Real Estate advises that it may have to dedicate an administrative staff member to records management depending on the regulations the Records Management Officer ultimately promulgates.

Thank you for considering these comments in your deliberations on Council Bill 20-0496. If you have any questions, please contact me at 410-396-4755.

Sincerely,

A handwritten signature in cursive script that reads "Joan M. Pratt, CPA".

Joan M. Pratt, CPA
Comptroller

cc: Mr. Dominic McAlily, Legislative Assistant, Office of the City Council President
Mr. Matt Stegman, Deputy Director of Government Relations, Office of the Mayor
Ms. Nina Themelis, Legislative Liaison, Office of the Mayor