



**Illinois Police Officers'
Pension Investment Fund**

IPOPIF POLICY AND PROCEDURE

POLICY NUMBER: PP-2024-01

SUBJECT: RECORDS MANAGEMENT POLICY

EFFECTIVE DATE: SEPTEMBER 13, 2024

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A. INTRODUCTION

1. The Illinois Police Officers' Pension Investment Fund ("IPOPIF") is required to maintain an active, continuing program for the economical and efficient management of records. The State of Illinois Records Act (5 ILCS 160) sets forth guidelines and responsibilities for IPOPIF concerning the retention and disposition of records.



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2. This Policy is designed to provide guidance to IPOPIF for the proper management of records (both paper and digital) to meet the requirements of the State Records Act and State Records Commission Rules.

B. AUTHORITY AND PURPOSE

1. This Records Management Policy establishes timeframes for the retention and destruction of IPOPIF records in a manner compliant with binding statutes and regulations.
2. An up-to-date record retention schedule ensures that IPOPIF obsolete records are properly and timely destroyed and enables efficient responses to agency record requests.
3. This Policy applied to all Board members and employees.
4. The retention requirements approved by the State Records Commission supersede any guidelines provided in IPOPIF policies.
5. The objectives of the policy are to:
 - a. IPOPIF maintains its records for the necessary time period.
 - b. IPOPIF properly disposes of records once the retention period has passed.
 - c. IPOPIF staff is informed of the requisite retention periods for fund records.

C. DEFINITIONS

The following are the definitions of the terms referenced in this Policy. Where possible, the definitions provided in the State Statute and Rules (5 ILCS 160 and Title 44 - Part 4400) are used:

1. Application for Authority to Dispose of State Records/Retention Schedules:

- The document lists the records in each office with corresponding retention, maintenance, and disposition requirements for a record series, based on administrative, fiscal, legal, or



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archival values for the scheduled records. A Retention Schedule is only valid and active upon approval by the State Records Commission.

2. Born-Digital Records:

- Records created in a digital format, as opposed to those created in other media and then converted to digital surrogates. Those include word processing documents, electronic spreadsheets, and digital photographs.

3. Digital Surrogate:

- Reproduction of content on analog media that has been scanned, photographed, encoded, or otherwise converted to a digital file that, when printed, viewed, or played, replicates the original content.

4. Disposal of Records:

- Is the destruction of the record in a secure manner? This will be the manner noted and approved on the Disposal Request.

5. Electronic Record:

- A record generated, communicated, received, or stored by electronic means. Both born-digital records and digital surrogates of analog records are considered electronic records. Databases or components of databases may or may not be considered records, depending upon their function and contents. Electronic records must be stored/retained using approved storage media, see Electronic Records section of this policy for additional information.

6. Media Neutral:

- Items that are included on a record retention schedule, regardless of their medium (i.e., paper, digital, etc.).



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7. Metadata:

- Metadata describes the record attributes in a way that enables their management and use/reuse. They also document the relationship between records and the agents that made and use them and the events, or circumstances in which the records are made and used. Metadata supports searching of information assets and maintaining their authenticity.

8. Non-Record Material:

- Non-Records may be copies of IPOPIF records and materials used solely for reference purposes, transitory messages consisting of correspondence of materials created to communicate information of short-term value, and private/personal material not related to public business. Non-Records should be disposed of as soon as possible after their primary usefulness has expired. Unlike IPOPIF records, non-records do not require State approval prior to their disposal.

9. Permanent:

- To be retained forever.

10. Records:

- All books, papers, digitized electronic material, maps, photographs, databases, or other official documentary materials, regardless of physical form or characteristics, made, produced, executed, or received by IPOPIF in pursuance of state law or in connection with the transaction of public business and preserved for preservation by the IPOPIF as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the State or of the State Government, or because of the informational data contained therein. (5 ILCS 160/2).



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11. Records Disposal Certificate:

- Also called the State of Illinois Records Disposal Certificate. IPOPIF must file the certificate with the State Records Commission prior to destruction of any records present on their approved Application for Authority to Dispose of State Records. This is the document that list the application number, item number, title, dates, volume, and disposal method of which they wish to request disposal authorization. IPOPIF must file the certificate with the State Records Commission thirty (30) days prior to the destruction of any records present on their approved Application for Authority to Dispose of State Records. IPOPIF may not dispose of records until the Certification has been approved and returned to IPOPIF and the thirty-day (30) waiting period has expired.

12. Record Series:

- A group of identical or related documents (either as to form or content) that is arranged under single filing system or kept together as a unit because they consist of the same form, relate to the same subject, result from the same activity, or have certain common physical characteristics (i.e., maps, blueprints, etc.). A series may contain both forms and correspondence.

13. Research, Historical or Archival Value:

- Records have enduring value when they reflect significant historical events or document the history and development of IPOPIF or its policy.

14. Retention Period:

- The retention period is found in the retention schedule and establishes the length of time required to maintain a record. The time frame for the retention of each record is determined by each office in cooperation with the State Records Commission. An important factor impacting the retention period and record storage location is how often the records are used. For example,



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15. Retention Schedules:

- Lists of records of IPOPIF and their disposition. It identifies the time frames those records are to be kept before requesting their destruction or transfer to archives. Records not listed in the retention schedule will need to be added before they can be approved for destruction.

16. Secure(d):

- All documents (paper or electronic) that are stored in locked cabinets, spaces, or by a method to prevent unauthorized access (encryption).

17. IPOPIF Archives:

- The location/managing office of permanent records preserved due to historical, administrative, legal, or enduring value as determined by the IPOPIF and the State Records Commission.

D. RECORDS MANAGEMENT PROGRAM

1. The objective of the Records Management Program is to provide a cohesive approach to effectively manage records. This approach lends itself to close coordination with the IPOPIF Board and employees and helps protect IPOPIF records, reduce liability, preserve historical records, and improve efficiencies. This includes the effective scheduling, retention, retrieval, disposition, and safekeeping of all records. This specifically includes:
 - a. Maintenance and modification of the State approved Records Retention Schedule for IPOPIF, including working with the State Records Commission on new applications and reclassification of records.
 - b. Arrange for the orderly transfer of inactive records to the appropriate destination, including but not limited to, IPOPIF Archives or the State Records Center.



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- c. Aid in maintaining filing systems to assure efficient usage and prompt retrieval of records.
- d. Aid the IPOPIF Board and employees in all matters relating to records management, filing systems, and electronic records.
- e. Ensure compliance with the State Records Act and corresponding guidance from the State.

E. ROLES AND RESPONSIBILITIES

1. All IPOPIF employees shall secure, maintain, and dispose of records in accordance with the retention schedules as approved by the State Records Commission. If an IPOPIF employee knowingly, and without lawful justification, destroys or otherwise disposes of a record not in accordance with approved retention schedules, the employee will be subject to IPOPIF issued discipline, up to and including suspension or termination.
2. If an employee has questions or concerns about whether they have the authority to destroy or dispose of a record, the employee should contact the Executive Director.
3. Employees are required to maintain records, regardless of format, in an organized and secure manner. Employees need to be aware of records that contain sensitive information, such as personally identifiable information (PII), financial documentation, health records, and other types of confidential information protected by IPOPIF policy and federal/state confidentiality laws and requirements.
4. An employee will not destroy an IPOPIF record without obtaining an approved Records Disposal Certificate from Secretary of State's Office. If an employee is permitted to dispose of a record, the employee will ensure that the disposition is done in a manner consistent with the State Records Act and State Records Commission rules regarding proper physical destruction of sensitive records and information. (44 Ill. Adm. Code Part 4400.40)



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F. IDENTIFICATION OF IPOPIF RECORDS

1. Identifying IPOPIF records is the first step in developing and maintaining a records system. An IPOPIF record includes all the following:
 - a. Books, papers, digitized electronic material, maps, photographs, databases, emails, or other official documentary materials, regardless of physical form or characteristics;
 - b. Made, produced, executed, or received by IPOPIF in the pursuance of State law or in connection with the transaction of public business; and
 - c. Preserved or appropriate for preservation by that agency or its successor as evidence of the organization, function, policies, decisions, procedures, operations, or other activities of IPOPIF, or because of the informational data contained therein.
2. All IPOPIF records are scheduled for disposal through the Executive Director. The Executive Director will communicate with the State Records Commission, which will collaboratively determine the administrative, legal, fiscal, and historical value and appropriate retention of all records.
 - a. Non-Record Material: Items not included within the definition of records, defined as "non-record materials," may be destroyed at any time by the department in possession of such material without the prior approval of the State Records Commission. The State Records Commission may, however, issue advisory procedures to guide in the disposition of non-record materials. (State Records Act Sec. 20, 42.23).
 - b. In accordance with the Freedom of Information Act (5 ILCS 140), all physical and electronic materials received or generated by IPOPIF which pertain to the transaction of public business are "public records" available for public inspection unless specifically exempted by law. However, only those "public



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records" which are also IPOPIF records must be managed according to the requirements put forth by the Illinois State Records Act. Although they may still be "public records" under the Illinois Freedom of Information Act, non-record materials are not subject to the management and disposal requirements of the State Records Act, and therefore, greater flexibility exists for their management in support of efficient business processes. Because most materials of IPOPIF may be non-record materials, efficient use of resources and compliance with State law necessitate a clear distinction between IPOPIF records and non-record materials.

- c. Non-record materials, as compared to records, do not require State approval prior to their disposal. Most non-record materials should be disposed of as soon as possible after their primary usefulness has expired. Whenever there is doubt that certain items are non-record materials, the items should be considered record materials until their status is determined. Please consult with the General Legal Counsel about whether an item is a record or non-record.

3. Electronic Records and IPOPIF Data

- a. An electronic record is a record generated, communicated, received, or stored by electronic means in various storage media. Both born-digital records and digital surrogates of analog records are considered electronic records. Databases or components of databases may or may not be considered records, depending upon their function and contents. IPOPIF retention schedules apply to all records based upon function and contents of the record, not its format (i.e., media neutral).



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- b. The management of electronic records follows many of the same principles used to manage traditional records to ensure compliance with the State Records Commission but have additional considerations including but not limited to the preservation and creation of metadata, keeping backup copies, and choosing appropriate formats for long term storage. In addition, records/information that is maintained, used, or in the possession of IPOPIF may be a public record subject to FOIA even if it is not a State record under the State Records Act.
 - c. All electronic records contain IPOPIF data. That data is classified according to the Information Security Policy, and/or state and federal regulations. All Board members, employees, and third-party agents are required to be aware of the data classification for which they have access to, or oversight of, and to apply appropriate and pre-determined safeguards and comply with all IPOPIF policy and/or state and federal regulations.
4. Digitizing Records
- a. Digitizing records is the process of creating a digital surrogate from an analog, or a paper record, for a variety of business reasons including ease of use, ease of access, efficiency, analytics, and retention. The integrity and authenticity of the analog records shall be preserved through the digitization process so that the images or surrogates will be authentic copies of the analog records. They must serve the purposes for which the original records were created or maintained, and the copies must contain all significant record detail needed for probable future reference. Analog records may be destroyed in favor of digital surrogates so long as the digital surrogates are produced in compliance with the State Records Commission Rules, found at 44 Ill. Admin. Code 4400.70 - Digital Reproduction.



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- 5. For IPOPIF, the scanning of paper documents creates digital copies of the record, but these may not be considered digital surrogates unless created in compliance with Section 4400.70. Questions about whether a scanned document constitutes a digital surrogate should be directed to Information Technology.
- 6. Records for IPOPIF Archives
 - a. The retention schedules contain dispositions for some record series that require those records to be permanently housed in IPOPIF Archives for retention. IPOPIF Archives retains and makes these available for research, in accordance with legislation protecting the privacy of individuals, the non-current records of IPOPIF which have historical, legal, or intrinsic value that typically has a permanent retention period. Although most retention schedules will indicate record groups destined for the Archives, IPOPIF Archives can denote any additional records considered essential for permanent preservation.

G. RECORD RETENTION SCHEDULE

Record Category	Retention Period
Actuarial Reports	Permanent
Administrative Rules	Permanent
Annual Reports	Permanent
Approved/Active Contracts	5 years
Article 3 Fund Reports	Permanent
Board Meeting Yearly Calendar	2 years
Board Meetings, agendas, materials, and minutes	Permanent
Digital Recording of Board Meetings	Permanent
Expired/ Declined Contracts	5 years
Investment Reports	Permanent
Invoices	5 years
IPOPIF Policies	Permanent
Monthly Financial Reports	Permanent
Other Governing Documents (Loans, Bylaws, etc.)	Permanent
Outside Services Records	5 years



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H. VIOLATIONS

1. Persons in violation of this policy may be subject to a range of disciplinary action (determined and enforced by IPOPIF), including but not limited to the loss of computer network access privileges, disciplinary action, dismissal from IPOPIF, and legal action.
2. Issues where there is concern that negligence or non-compliance has occurred should be brought to the General Legal Counsel.
3. When an employee knowingly, and without lawful authority, alters, destroys, defaces, removes, or cancels an IPOPIF record may be referred to external authorities and may result in further proceedings.

I. POLICY REVIEW

1. The Policy is subject to change in the exercise of the Board's judgement.
2. The Board of Trustees will review this policy at least every two (2) years to ensure that it remains relevant and appropriate and consistent with state and federal laws and regulations.
3. In the event of legislative changes to the pertinent sections addressed in this policy the Board will review the policy as appropriate.
4. This policy was adopted by the Board of Trustees on September 13, 2024.