



**Columbus-Franklin County
Finance Authority**

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Columbus-Franklin County Finance Authority Public Records Policy Date Approved: December 18, 2024

Introduction

It is the philosophy of the Columbus-Franklin County Finance Authority to maintain open and easy access to all public records that it retains. It is the policy of the Columbus-Franklin County Finance Authority (the "Finance Authority") to adhere to the state's Public Records Act. Any denial of public records in response to a valid request in accordance with the Public Records Act will be accompanied by an explanation, including legal authority, as outlined in the Ohio Revised Code. If the request is in writing, the explanation will also be in writing.

Section 1. Public Records

The Finance Authority, in accordance with the Ohio Revised Code, defines public records as including the following: Any document – paper, electronic (including, but not limited to, e-mail), or other format – that is created or received by, or comes under the jurisdiction of the Finance Authority that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the office. All records of the Finance Authority are public unless they are specifically exempt from disclosure under the Ohio Revised Code.

Exempt records include, but are not limited to (i) financial and proprietary information, including trade secrets, submitted by or on behalf of an employer to a port authority or to a nonprofit corporation engaged by contract to provide economic development services for a port authority, in connection with the relocation, location, expansion, improvement, or preservation of the business of that employer which is not a public record subject to section 149.43 of the Revised Code, (ii) any other information submitted by such an employer under those circumstances which is not a public record subject to section 149.43 of the Revised Code until that employer commits in writing to proceed with the relocation, location, expansion, improvement, or preservation and (iii) all other records of the Finance Authority that are excluded from the definition of "public record" in O.R.C. Section 149.43.

Section 1.1 - It is the policy of the Finance Authority that, as required by Ohio law, records will be organized and maintained so that they are available for inspection and copying (See Section 4

for the electronic record policy). Record retention schedules are reviewed regularly and readily available to the public.

Section 2. Record requests

Each request for public records should be evaluated for a response using the following guidelines:

Section 2.1 - Although no specific language is required to make a request, the requester will at least identify the records requested with sufficient clarity to allow the public office to identify, retrieve, and review the records.

Section 2.2 – Consistent with the Ohio Revised Code and Finance Authority policy, the requester does not have to put a records request in writing, and does not have to provide his or her identity or the intended use of the requested public record. However, the law does permit the Finance Authority to ask for a written request, the requester’s identity, and/or the intended use of the information requested, but only if (1) a written request or disclosure of identity or intended use would benefit the requester by enhancing the Finance Authority’s ability to identify, locate, or deliver the public records that have been requested; and (2) the requester is first told that a written request is not required and that the requester may decline to reveal the requester’s identity or intended use.

Section 2.3 - Public records are to be available for inspection during regular business hours, with the exception of published holidays. Public records will be made available for inspection promptly. Copies of public records will be made available within a reasonable period of time. “Prompt” and “reasonable” take into account the volume of records requested; the proximity of the location where the records are stored; the necessity for any legal review; and any other pre-review of the records requested. In processing a request for inspection of a public record, a Finance Authority employee may be present during the inspection to make sure certain original records are not taken or altered.

Section 2.4 - Each request should be evaluated for an estimated length of time required to gather the records. Routine requests for records should be satisfied promptly. Routine requests include, but are not limited to, meeting minutes (both in draft and final form), budgets, salary information, forms and applications, personnel rosters, etc. If a request is deemed to be beyond routine, such as seeking a voluminous number of copies or requiring an extensive pre-release review or search for materials, the Finance Authority shall acknowledge receipt of the request in writing within a reasonable amount of time.

Section 2.5 - The Finance Authority has a duty to review any and all records deemed initially responsive to a public records request. This pre-release review is required to prevent disclosure of personal information that may be protected by state and federal privacy laws (e.g., account numbers, medical information), and confidential records which must not be disclosed under penalty of law (e.g., certain investigatory, criminal, and education records). Additionally, documents must undergo a pre-release review to identify material protected by attorney-client

and executive privilege, as well as to redact critical security and infrastructure records. Such records may be exempt from public disclosure under the Ohio Public Records Act.

Section 2.6 - If the requester makes an ambiguous or overly broad request or has difficulty in making a request such that the Finance Authority cannot reasonably identify what public records are being requested, the request may be denied, but the Finance Authority will then provide the requester an opportunity to revise the request by informing the requester of the manner in which records are maintained and accessed by the Finance Authority.

Section 2.7 - If the Finance Authority withholds, redacts, or otherwise denies requested records, it will provide an explanation, including legal authority, for the denial(s). If the initial request was made in writing, the explanation must be in writing. If portions of a record are public and portions are exempt, the exempt portions will be redacted, and the rest will be released. When making public records available for public inspection or copying, the Finance Authority will notify the requester of any redaction or make the redaction plainly visible.

Section 2.8 - In processing the request, the Finance Authority does not have an obligation to create new records or perform a search or research for information in its records. An electronic record is deemed to exist so long as a computer is already programmed to produce the record through the Finance Authority's standard use of sorting, filtering, or querying features.

Section 3. Costs for Public Records

Those seeking public records will be charged only the actual cost of making copies, not labor.

Section 3.1 - The charge for paper copies is 6 cents per page.

Section 3.2 - The charge for downloaded computer files to a compact disc is \$1 per disc, plus the actual cost of the hardware.

Section 3.3 - There is no charge for e-mailed documents.

Section 3.4 - Requesters may ask that documents be mailed to them. They will be charged the actual cost of the postage and mailing supplies, or other actual costs of delivery.

Section 4. Electronic Records

Records whose content relates to the business of the Finance Authority in the form of e-mail, text messaging, and instant messaging, including those sent and received via a hand-held communications device are public records. Such records are to be treated in the same fashion as records in other formats, such as paper or audiotape, and will follow the same retention schedules.

Section 4.1 – Public record content in private accounts or personal devices used to conduct public business are subject to disclosure, and all employees or representatives of this office are instructed to retain their e-mails and other electronic records that relate to public business (see

Section 1 Public Records) and to copy them to their business e-mail accounts and/or to the office's records custodian.

Section 4.2 – The records custodian is to treat the public records from private accounts as records of the public office, filing them in the appropriate way, retaining them per established schedules and making them available for inspection and copying in accordance with the Public Records Act.

Section 5. Managing Records

The Finance Authority's records are subject to records retention schedules, which are attached as Attachment A. The Finance Authority's current schedules are available at 300 Spruce Street, Suite 220, Columbus, Ohio 43215 and <https://columbusfinance.org/about-us/>, a location readily available to the public as required by Ohio Revised Code § 149.43(B)(2).

Section 6. Records Custodian

The Finance Authority, in accordance with its Rules and Regulations, designates the Assistant Secretary-Treasurer who also serves as the President as its records custodian (the "Records Custodian"). The Records Custodian is responsible for the administration of and compliance with the Finance Authority's Public Records Policy, including retention schedules. The Finance Authority shall distribute to the Records Custodian, and each successor thereafter, a copy of the Public Records Policy and the Records Custodian shall acknowledge receipt thereof.

ACKNOWLEDGMENT BY RECORDS CUSTODIAN

I, _____, have been designated as the principal records custodian for the Columbus-Franklin County Finance Authority, and in accordance with Section 149.43(E)(2) of the Ohio Revised Code, do hereby acknowledge receipt of the Columbus-Franklin County Finance Authority Public Records Policy.

Signature of Records Custodian

Date

ATTACHMENT A
SEE ATTACHED



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Columbus-Franklin County Finance Authority Records Retention Schedule Updated/Adopted: December 18, 2024

The Columbus-Franklin County Finance Authority, like other public entities in the State of Ohio, must retain certain records from year to year. Although the *Ohio Revised Code* does not set guidelines for Port Authorities, the Board of Directors of the Columbus-Franklin County Finance Authority adopted the following policy for records retention. Records may be kept in either hardcopy or digital media format, or a combination of formats. Hardcopies may be disposed if also kept in digital media format. Multiple copies of the same record do not need to be retained.

RECORDS	RETENTION SCHEDULE
FINANCIAL RECORDS	
Accounts Receivable Ledger and Documents	5 years, provided audited
Accounts Payable	5 years, provided audited
Annual Financial Report to the Auditor of the State	Permanent
Annual Basic Financial Statements	5 years
Audit Reports	5 years
Bank Deposit Receipts	5 years, provided audited
Bank Statements	5 years, provided audited
Budgets	10 years, provided audited
Budget Preparation Documents	Until budget is in effect
Check Registers	5 years, provided audited
Invoices/Vouchers/Statements to Authority	5 years, provided audited
Invoices/Statements from the Authority	5 years, provided audited
Tax Payment Records	5 years, provided audited
BOARD RECORDS	
Board Packets	Permanent

Board Member Correspondence¹	1 year or sooner if no longer of administrative value
Board Member Appointment Documentation	Permanent
Board Minute Book/Database Files²	Permanent

RECORDS	RETENTION SCHEDULE
PROJECT RECORDS	
Closing Documents	As long as the financing is outstanding plus 8 years
Project Records (successful)	3 years
Project Records (unsuccessful)	3 years
Sales Tax Exemption Certificates	As long as the financing is outstanding plus 4 years
OPERATIONS RECORDS	
Annual Activity Records	3 years
Applications for Employment (not hired)	3 years
Compliance Reports	5 years
Contracts	8 years after expiration, unless in active dispute
Correspondence – General³	2 years
Email	All e-mails will be retained for 2 years, and thereafter retained according to the retention schedule based on its content
Expense Records	3 years, provided audited
Grant Files	5 years after grant awarded and complete or in accordance with applicable contract, whichever is later
Insurance Policies	8 years after expiration, unless in active dispute
Leases (Equipment/Real Estate)	8 years after expiration, unless in active dispute

¹ Includes items not also received by e-mail or text, including internal correspondence (letters, memos), correspondence from various individuals, companies and organization requesting information pertaining to the Authority and miscellaneous inquires. Correspondence is informative, it does not influence agency policy.

² Includes Board and Finance Committee minutes, public meeting notices, agendas, resolutions, motions, rules and regulations – all documents pertinent to the Board meetings for the year filed.

³ Includes items not also received by e-mail or text, including internal correspondence (letters, memos), correspondence from various individuals, companies and organization requesting information pertaining to the Authority and miscellaneous inquires. Correspondence is informative, it does not influence agency policy.

Legal Records (Correspondence/Opinions/Case Files/Settlements)	5 years, provided no action pending
Payroll Journal/Reports	5 years, provided audited
Personnel Files	2 years after termination
Policy Procedures/Processes	Permanent for current policy procedures and processes, prior superseded versions should be retained for 5 years
Press/News Releases	3 years
Purchase Orders/Requisitions	3 years, provided audited
Records Requests	2 years
Speeches/Presentations	3 years
Voicemails	Until no longer of administrative value
Text messages	30 days or sooner if no longer of administrative value