



BOARD POLICY

800 Records Management Draft 3

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Purpose

It is the policy of this school district to generate and retain only those records and data which are required for the effective operation of the district and to meet the obligations to students, parents/guardians, employees, and state, local and federal governments.

The Board recognizes the importance of establishing and maintaining a Records Management Plan that defines district staff responsibilities, complies with federal and state laws and regulations, and improves efficiency by reducing the time spent retrieving required information from duplicate and other unnecessary records and data.

A Records Management plan will provide better access, control, and retrieval of information resources within the district; preserve storage space; optimize network performance; make complying with litigation requirements more efficient; and ultimately lower the district's overall information management costs.

Authority

The Board shall retain, as a permanent record of the district, Board minutes, annual auditor's reports and annual financial reports. All other financial records, including financial account books, orders, bills, contracts, invoices, receipts and purchase orders, shall be retained by the district for a period of not less than six (6) years.[1]

All other district records shall be retained in accordance with state and federal law and regulations and the district Records Management Plan approved by the Board.

The district shall make a good faith effort to comply with all proper requests for record production. Selective Destruction of records in anticipation of litigation is forbidden.[2] [3]

Definitions

Electronic Mail (E-mail) System - a system that enables users to compose, transmit, receive and manage text and/or graphic electronic messages and images across local area networks and through gateways connecting other networks. This information consists primarily of messages but may include attachments such as calendars, directories, distribution lists, word processing documents, spreadsheets, and other electronic documents.

Electronic Records - include numeric, graphic, and text information, which may be recorded, on any medium capable of being read by a computer and which satisfies the definition of a record. Electronic records include, but are not limited to: magnetic media such as computer tapes, disks, optical disks, diskettes and other electronic storage devices and electronic filing systems containing records. This also includes data stored in the cloud and District-wide network systems.

Litigation Hold - a communication ordering that all records and data relating to an issue being addressed by current or potential litigation or investigation be preserved for possible production during the litigation or investigation.

Records - information, regardless of physical form or characteristics, that documents a transaction or activity of the district and that is created, received or retained pursuant to law or in connection with a transaction, business or activity of

the district. The term includes a document, paper, letter, map, book, tape, photograph, film, **video, images** or sound recording, information stored or maintained electronically and a data-processed or image-processed document.[\[4\]](#)

Records Management Plan - the system implemented by the district for the retention, retrieval, and disposition of all records generated by district operations.

Records Retention Schedule - a comprehensive listing stating retention periods and proper disposition of records.

Delegation of Responsibility

Any individual responsible for the collection, maintenance, and/or security of records on behalf of the District shall comply with State and federal laws and regulations, Board policies, District procedures and the Records Management Plan.

Records Coordinator

In order to maintain a Records Management Plan that complies with federal and state laws and regulations and Board policy, the Board designates the Superintendent or designee as the district's Records Coordinator who shall serve as the chairperson of the Records Management Committee.

The Records Coordinator shall be responsible to:

1. Ensure that training appropriate to the user's position and level of responsibility is provided. Such training may include:
 - a. A review of this policy, administrative regulations and Records Management Plan.
 - b. Operation, care and handling of the equipment and software.
 - c. Requirements of the Records Retention Schedule.
 - d. Protocols for preserving and categorizing district records.
 - e. Procedures and responsibilities of district staff in the event of a litigation hold.
 - f. Identification of what is and what is not a record.
 - g. Disposal of records.
2. Review the Records Management Plan **annually periodically** to ensure that record descriptions and retention periods are updated as necessary.
3. Monitor changing technology and legal developments to recommend revisions to the Records Management Plan and/or district operations.
4. Identify, when the retention period expires, the specific records to be disposed of and ensure that all identified records are properly disposed of at regular intervals of at least once every twelve (12) months.

Records Management Committee

A committee responsible for the development and recommendation of the district's Records Management Plan shall be established by the Board. The Records Management Committee shall give primary consideration to the most efficient and economical means of implementing the recommended Plan. **The Committee shall consult with the district solicitor as it deems necessary.** Members of the Committee shall include the:

1. Open Records Officer. **[5]**
2. Superintendent, **if not Records Coordinator.**

3. Board Secretary.[\[6\]](#)
4. ~~District solicitor~~
5. Director of Communications
6. Information Technology Director or designee.
7. ~~Business Manager~~Chief Financial Officer.
8. Board member(s).
9. Records Management Coordinator.
10. Human Resources Director.
11. Other persons as assigned.

The Records Management Committee shall meet ~~at least annually periodically~~ to evaluate the effectiveness and implementation of the Records Management Plan and recommend changes as needed.

Guidelines

Records Management Plan

The district's Records Management Plan shall be the principal means for the ~~storage,~~ retention, retrieval, and disposition of manual and electronic records, ~~including e-mails.~~ The Plan shall not rely primarily on backup systems to manage the retention and disposition of records.

The Records Management Plan, ~~as outlined in the administration regulations,~~ shall include:

1. Comprehensive listing of records and data of the district.
2. Criteria to distinguish records of the school district from the supplemental personal records of individual employees.[\[10\]](#) [\[11\]](#)
3. System(s) of records storage and retrieval to be used, including in what form the records will be stored, maintained, reproduced, and disposed.

4. Preservation measures to protect the integrity of records and data.
5. ~~Data map or flow chart detailing the sources, routes, and destinations of electronic records.~~
6. Procedures and employee designated for determining whether an item is a record.
7. Procedures for adding, revising or deleting records and data, and any other details necessary to implement the Records Management Plan.
8. Records Retention Schedule.
9. Provisions for the storage and retrieval of records in the event of an emergency or disaster.
10. Staff positions authorized to access district records.
11. Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all records relevant to the current or potential claim. Such procedures shall specify:
 - a. Who can initiate a litigation hold.
 - b. How and to whom a litigation hold is communicated.
 - c. Who will determine which records are subject to the litigation hold.
 - d. Who will be responsible for collecting and preserving such records and data.
 - e. Who will be responsible for monitoring and ensuring the district's compliance with the litigation hold.
 - f. In what format the records will be collected.

When possible, records and data shall be stored in their original form, including metadata, such as creation date, author, type of file, etc.

For any record not covered by the Records Retention Schedule, the Records Management Committee shall determine how long the record shall be kept and recommend any necessary revisions to the retention schedule.

The district shall maintain and dispose of records in a manner that protects any sensitive, proprietary or confidential information or individual privacy rights, and helps conserve natural resources.

Manual Records

Manual records, which include all records not stored electronically, shall be retained and disposed of in accordance with the Records Management Plan.

Manual records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

~~The district shall develop and maintain adequate and up-to-date documentation about each manual record system. Documentation may:~~

- ~~1. List system title and responsible employee(s) or office.~~
- ~~2. Define the contents of the system, including record formats.~~
- ~~3. Identify vital records and information.~~
- ~~4. Determine restrictions on access and use.~~

Electronic Records

It is the policy of this district to retain only those electronic records minimally necessary for student instruction and district business in accordance with the Record Retention Schedule. As such, all district personnel are directed to create and retain only those electronic records necessary for student instruction and district business on the district's information network.

Electronic records shall be retained and disposed of in the same manner as records in other formats and in accordance with the Records Management Plan.

Electronic records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

~~The district shall develop and maintain adequate and up to date documentation about each electronic record system. Documentation may:~~

- ~~1. List system title and responsible employee(s) or office.~~
- ~~2. Specify all technical characteristics necessary for reading or processing the records stored on the system.~~
- ~~3. Identify all defined inputs and outputs of the system.~~
- ~~4. Define the contents of the system, including record formats and database tables.~~
- ~~5. Identify vital records and information.~~
- ~~6. Determine restrictions on access and use.~~
- ~~7. Describe update cycles or conditions.~~

E-mail Records

All e-mails sent or received by district e-mail users shall be archived for a minimum period of three (3) years.

E-mail messages, in and of themselves, do not constitute records. Retention and disposition of e-mail messages depend on the function and content of the individual message.

Records on an e-mail system, including messages and attachments, shall be retained and disposed of in accordance with the district's Records Management Plan.

~~E-mail records may be maintained as an electronic record or be printed and maintained as a manual record.~~

~~For each e-mail considered to be a record, the following information shall be retained:~~

- ~~1. Message content.~~
- ~~2. Name of sender.~~
- ~~3. Name of recipient.~~
- ~~4. Date and time of transmission and/or receipt.~~

Contractors Service Providers

~~Records created or maintained by contractors employed by the Board shall be retained and disposed of in accordance with the Records Management Plan. The Board requires- prefers and seeks contractors that will follow with the District guidelines to create, maintain, retain, and dispose of district records in accordance with the Records Management Plan. However, in the absence of this, the Board expects compliance within the terms of its agreement.~~^[8]

Exceptions

This policy shall not apply to:

1. Student records. Student records are managed under the district's Student Records Plan and Board policy. ^[9]
2. Items that do not meet the definition of a record, which shall not be subject to retention.

Legal Footnotes

[1] 24 P.S. 518
LEGAL REFERENCE

[2] 65 P.S. 67.901
LEGAL REFERENCE

[3] Pol. 828 — Fraud
POLICY REFERENCE

[4] 65 P.S. 67.102
LEGAL REFERENCE

[5] Pol. 801 — Public Records
POLICY REFERENCE

[6] 24 P.S. 433
LEGAL REFERENCE

[8] 65 P.S. 67.506
LEGAL REFERENCE

[9] Pol. 216 — Student Records
POLICY REFERENCE

[10] 20 U.S.C. 1232g
LEGAL REFERENCE

[11] 65 P.S. 67.708
LEGAL REFERENCE

Legal References

No additional references listed.