

BLOOMSBURG AREA SCHOOL DISTRICT
Policy Manual

Section: 800
Title: Records Management
Date Adopted: 19 May 2008
Date Last Revised: 15 April 2013

800. Records Management

.1 Purpose The Board recognizes the importance of establishing and maintaining a Records Management Plan that defines district staff responsibilities and complies with federal and state laws and regulations.

.2 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 seven (7) years, after which they shall be destroyed.

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.

.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.

Litigation Hold - a communication ordering that all records and data relating to the subject of a dispute being addressed by current, threatened or impending litigation be preserved for possible production in the litigation.

Records - any recorded information, regardless of form and including electronic records, that documents a transaction or activity that is created, received or retained in pursuance of law or in connection with the transaction of official business.

Records Management Plan - the system prescribed by the policy 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.

.4 Delegation of Responsibility

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. Members of the Committee shall include the:

1. Superintendent.
2. District solicitor.
3. Technology Systems Administrator.

The Records Management Committee shall meet as needed to evaluate the effectiveness and implementation of the Records Management Plan and recommend changes.

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 Business Manager as the district's Records Coordinator.

The Records Coordinator shall be responsible to:

1. Ensure that training appropriate to the user's position and level of responsibility is provided.
2. Review the Records Management Plan periodically to ensure that record descriptions and retention periods are updated as necessary.
3. Identify, when the retention period expires, the specific records to be disposed of in a manner consistent with the Records Management Plan. These should be automatically disposed.

.5 Guidelines

Records Management Plan

The Records Management Plan shall be as specified herein, and shall be the principal definition for the retention, retrieval, and disposition of manual and electronic records, including e-mails.

Notwithstanding anything herein to the contrary, any law or regulation relating to the retention of Records shall supersede statements in the Records Management Plan.

.6 Litigation Hold

Issuing a Litigation Hold is the responsibility of the Superintendent or Business Administrator, who shall consult with Solicitor as needed. The Litigation Hold will be sent directly to the Records Coordinator. The Litigation Hold may be communicated initially by phone but will be followed by a written notification (fax, e-mail or letter).

A Litigation Hold shall be issued when a communication is received by a member of the School District administrative staff reasonably notifying the School District of a dispute that is current, threatened or impending. Administrative staff who receive any such communication shall immediately forward or relay the same to the Superintendent.

The Superintendent, in consultation with the Solicitor as needed, will decide which records are subject to the Litigation Hold and in which form the records will be retained or produced.

The Superintendent or designee will be responsible for collecting such records.

.7 Backups

Electronic Records maintained for disaster recovery shall be referred to herein as “Backups.” The School District shall delete and/or dispose of Backups when they are more than 14 days old.

.8 Archived Electronic Material

“Archived Electronic Material” is an electronic copy of a Backup pertaining to a calendar day and copied once per year. Archived Electronic Material shall be deleted and/or disposed of when it is more than one year old, except with respect to business office records (i.e., business office records shall include, but shall not be limited to, check registers, deposit slips, annual financial reports, and investment records).

.9 E-Mail and other electronic documents

Notwithstanding the Records Retention Schedule, the following shall apply to the retention, deletion and/or disposal of electronically sent messages (“e mail”) and other electronic documents. E mail and electronic documents which have been sent to a “trash” folder shall be deleted 30 days after it is sent to the “trash” folder, unless there is a Litigation Hold put on the material.

.10 Records Retention Schedule

This Records Retention Schedule attempts to list Records that are created, received or retained as a result of district operations. The schedule includes a description of the Records, format in which the Records will be retained, classification of the Records, retention period, and disposal code. The following information will assist in applying the Schedule.

Media codes are used to identify the format(s) of a record. The Media Codes are as follows:

- A. Paper
- B. Microform
- C. Electronic and Optical (machine readable)
- D. Audiovisual (tapes, movies, film strips, etc.)
- E. Cartographic (maps, drawings, blue prints, plans, etc.)
- F. Photographic

District Records will be classified based on the information contained therein. Public Records will be identified and made available for inspection in accordance with applicable law and regulations. Records containing private or confidential information will be protected from unauthorized access in accordance with applicable law, regulations, Board policy and administrative regulations.

Retention periods listed on the Schedule are given in years, unless otherwise indicated. Upon expiration of the retention period, identified Records will be disposed of in accordance with the Schedule.

Disposal codes are used to direct the final disposition of Records. Records must be disposed of according to the assigned code listed on the Schedule. Assigned disposal codes are as follows:

1. Routine Handling – No special precautions are necessary upon disposal. The records should be recycled or disposed of in accordance with standard district procedures.
2. Special Handling – The destruction of records containing confidential or sensitive information that requires special handling by shredding, burning, recycling or any other method that reduces information to an illegible condition.
2. Archival Retention – Records requiring permanent retention or records that have sufficient archival or historic value must be preserved in perpetuity.
3. Delete – For use with electronic records. When electronic records have met their retention period, they will be deleted.

Records Not On Schedule

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

Schedule

NOTE that the retention period listed below is the minimum period recommended or required by law or regulations.

Record Description	Record Classification	Retention Period (in years)	Disposal Code
Accident Reports	Public	5	1
Accounts Payable	Public	7	1
Accounts Receivable	Public	7	1
Adopted Annual Budget	Public	10	1
Annual Financial Reports	Public	Permanent	3
Annual Audit Reports	Public	Permanent	3
Attendance Records (Employees)	Private	3 after employment ends	2
Background Check Documentation	Private	7 after employment ends	2
Bank Statements	Public	7	1
Bid Contracts (Accepted)	Public	6 after termination	1
Bid Contracts (Declined)	Public	3 after completion	1
Board Minutes	Public	Permanent	3
Board Policies and Procedures (Current)	Public	Permanent	3
Board Policies and Procedures (Old)	Public	Permanent	3
Budget Work Papers	Contains private info	1 after adoption	2
Check Registers	Public	7	1
Collective Bargaining Agreements	Public	3 after expiration	1
Complaints (By or About Employee)	Private	7 after employment ends	2
Complaints (General)	Public	6	1
Construction Contracts	Public	12 after termination	1
Continuing Education/Professional Development	Private	3 after employment ends	2
Correspondence (General)	Public	3	2
Correspondence (Superintendent)	Public	Permanent	3
Credentials (Certificates/Licenses)	Private	4 after employment ends	2
Deeds and Related Records	Public	Permanent	3
Deposit Slips	Public	7	1
Discipline Records (Employees)	Private	7 after employment ends	2
District Organization Records	Public	Permanent	3
Emergency Preparedness Plan	Public	2 after revised	1
Employee Training Programs	Private	15 after employment ends	2
Employment Application (Hired)	Public	7 after employment ends	1
Employment Application (Not Hired)	Public	1	1
Employment Contracts	Public	3 after employment ends	1
Equal Employment Opportunity Reports	Public	3	1
Equipment Inventories	Public	6	1
Ethics Statement of Financial Interest	Public	5	1
Evaluations (Employees)	Private	3 after employment ends	2
Facility Use Files	Public	6	1

Record Description	Record Classification	Retention Period (in years)	Disposal Code
Fixed Asset List	Public	Permanent	3
Free and Reduced Lunch	Public	5	1
General Ledger	Public	Permanent	3
Grievances	Private	7 after employment ends	2
Insurance Claims and Policies	Public	7 after settlement and/or expiration	1
Investment Records	Public	7 after cancellation	1
Leases (Real Estate)	Public	Permanent	3
Leases (Equipment/Vehicles)	Public	7 after expiration	1
Leave Records (FMLA)	Private	3 after employment ends	2
Leave Records (Other)	Private	3 after employment ends	2
Litigation Files	Private	7 after final conclusion of litigation	2
Medical Records (Employee)	Confidential	30 after employment ends	2
Medical Records (Student)	Private	2 after graduation	2
Payroll Records	Contains private info	7	2
Pesticide Application Record	Public	3	1
Pre-Employment Medical Examination	Confidential	3 after employment ends	2
Pre-Employment Reference Checks	Confidential	3 after employment ends	2
Press Releases	Public	Permanent	3
Purchase Orders	Public	7	1
Real Property Purchase or Sale	Public	Permanent	3
Resignation/Retirement Records	Private	7 after employment ends	2
Safe School Act Reports	Public	Permanent	3
Student Records*			
Category A	Contains private info	100	3
Category B	Contains private info	Reviewed periodically	2
Category C	Contains private info	Reviewed annually	2
Tax Collection Records	Public	7	1
Wage and Tax Statements (W-2 Forms)	Private	4	2
Withholding Allowance Certificates (W-4 Forms)	Private	4 after employment ends	2
Workers' Compensation Records	Contains private info	7 after claim closed	2

* The retention periods for student records should coincide with the district's plan for student records. 22 PA Code Sec. 12.32 requires each district to develop a plan for the management of student records. Section 12.32 also states that the Department of Education will issue guidelines

for the retention of student records. Because no current guidelines exist, the student record retention periods above are based on the previous guidelines issued by the Department.

References:

School Code – 24 P.S. Sec. 433, 518

Family Educational Rights and Privacy Act – 20 U.S.C. Sec. 1232g

Federal Rules of Civil Procedure – 16, 26, 34, 37, 45

Board Policy – 004, 006, 105.2, 114, 138, 203, 203.1, 209, 212, 216, 216.1, 233, 314, 324, 326, 334, 601, 609, 610, 618, 619, 702, 706, 716, 801, 810, 810.1, 830, 912