

SHALER AREA SCHOOL DISTRICT

No: 800

SECTION: OPERATIONS

TITLE: RECORDS MANAGEMENT

ADOPTED: OCTOBER 10, 2007

REVISED: JULY 16, 2008; AUGUST 19, 2009

	<h2>800. RECORDS MANAGEMENT</h2>
	<p>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.</p>
1. Purpose	<p>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.</p>
2. Authority SC 518	<p>All other District records shall be maintained in accordance with state and federal law and the District Records Management Plan approved by the Board.</p> <p>The District shall make a good faith effort to comply with proper requests for record production. Selective destruction of records in anticipation of litigation is forbidden.</p>
65 P.S. Sec. 67.901 Pol. 828	<p>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.</p>
3. Definitions	<p>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.</p> <p>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.</p>
65 P.S. Sec. 67.102	<p>The term includes a document paper, letter, map, book, tape, photograph, film, or sound recording, information stored or maintained electronically and a data-processed or image-processed document.</p>

Records Management Plan – the system implemented by the District for the retention, retrieval, and disposition of all record, generated by District operations.

Records Retention Schedule – A comprehensive listing stating retention periods and proper disposition of records.

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 Superintendent; Assistant Board Secretary; District Solicitor; Director of Technology or designee; Director of Business Affairs; Business Manager; Data Operations Specialist; Administrative Assistant for Business Affairs.

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

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 Director of Business Affairs and the Administrative Assistant to the Director of Business Affairs as the District's Records Coordinators.

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. Operation, care, and handling of the equipment and software.
 - B. Requirements of the records retention schedule.
 - C. Protocols for preserving and categorizing District records.
 - D. Identification of what is and what is not a record.
 - E. Disposal of records.
 - F. Procedure and responsibilities of District staff in the event of a litigation hold.
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 as needed and ensure that all identified records are properly disposed of as needed.

<p>3. Guidelines</p> <p>65 P.S. Sec. 67.708</p> <p>20 U.S.C. Sec. 1232g</p>	<p><u>Records Management Plan</u></p> <p>The District's Records Management Plan shall be the principal means for the 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.</p> <p>The Records Management Plan shall include:</p> <ol style="list-style-type: none"> 1. Comprehensive listing of records and data of the District. 2. Criteria to distinguish School District records from employee's records. 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 who can initiate a litigation hold; how and to whom a litigation hold is communicated; who will determine which records are subject to the litigation hold; who will be responsible for collecting and preserving such records and data; and in what format the records will be collected. Such procedures shall specify who will be responsible for monitoring and ensuring the District's compliance with the litigation hold.
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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.

Electronic Records

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.

E-mail Records

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 which cites disposal can occur after two months.

E-mail messages and attachments that do not meet the definition of records shall be deleted as required by the records retention schedule.

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 transmission and/or receipt.

Contractors

Records created or maintained by contractors employed by the Board shall be retained and disposed of in accordance with the Records Management Plan.

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

Right to Know Law – 65 P.S. Sec. 67.101 et seq.

65 P.S.
Sec. 67.506

Board Policy – 004, 006, 105.2, 114, 138, 203, 203.1, 209, 212, 216, 216.1, 233, 314, 414, 514, 324, 424, 524, 326, 426, 526, 34, 434, 534, 601, 609, 610, 618, 619, 702, 706, 801, 810, 810.1, 828, 830, 912