

ADMINISTRATIVE REGULATION

CENTENNIAL SCHOOL DISTRICT

APPROVED: June 14, 2016

REVISED:

800-AR-0. RECORDS MANAGEMENT

In order to effectively implement the Records Management Plan, building administrators, department heads, and/or designated employees will be responsible for identifying and routing the various types of records and data that each department creates, gathers, uses or disseminates. Requests to add, revise or delete records will be approved and initialed by the Superintendent.

All records, whether created or stored on electronic systems, must be retrievable and available for the entire retention period listed on the Records Retention Schedule.

Before any record is converted to a different medium, i.e. paper to electronic, the District will determine that the authorized disposition of the records can still be implemented after conversion.

Electronic Records

The Records Management Committee will recommend appropriate media and systems for storing electronic records throughout their life.

The specific requirements for selecting storage media for electronic records include the following:

1. Permits retrieval in a timely fashion.
2. Facilitates the distinction between records and non-records as well as the distinction between employee records and school District records.
3. Retains the records in a usable format for the length of their required retention period.

The following factors will be considered before selecting storage media or when converting records from one medium to another:

1. Required retention period for the records.
2. Maintenance necessary to retain the records in that format.
3. Ability to index and search records.

4. Costs of storing and retrieving the records stored in that format.
5. Density of the record.
6. Access time necessary to retrieve stored records.
7. Ability of the medium to run on equipment produced by multiple manufacturers.
8. Ability to transfer information from one medium to another.
9. Flexibility of the software to be used.
10. Compliance of the storage medium with current industry and/or government standards.

Before a document is created and maintained on an electronic records system, documents will be identified sufficiently to enable authorized personnel to retrieve, protect and carry out the disposition of documents in the system. Appropriate identifying information for each document maintained on electronic media may include: office of origin; file code; key words for retrieval; addressee, if any; signature; author; date; authorized disposition, coded or otherwise; and security classification, if applicable.

The District will ensure that records maintained in such systems can be correlated with related records on paper, microform, or other media.

The District must provide for the usability of image and index data for records stored on an electronic recordkeeping system over time by establishing:

1. Methods for all authorized users of the system to retrieve desired records.
2. Appropriate levels of security to ensure integrity of the records.
3. A standard interchange format when necessary to permit the exchange of records on electronic media using different software/operating systems and allow for the conversion or migration of records from one system to another.
4. Procedures for the disposition of records in accordance with the Records Retention Schedule.
5. Procedures for regular copying, reformatting, and other necessary maintenance to ensure the retention and usability of electronic records throughout their required retention period.
6. Similar security precautions required of paper records to be used when destroying or reusing electronic media that contain privacy-protected or confidential information. Electronic storage media containing such information must be electronically wiped clean or physically destroyed in such a manner that the information cannot be reconstructed by generally available means.

Record And Data Integrity

The District's records security program will:

1. Ensure that only authorized personnel have access to electronic records.
2. Provide for backup and recovery of records to protect against information loss.
3. Ensure that District personnel are trained to safeguard sensitive or classified electronic information.
4. Minimize the risk of unauthorized alteration or erasure of electronic records.
5. Ensure that electronic record security is included in a computer systems security plan.
6. Ensure that duplicate copies of permanent records are maintained in separate buildings or systems.

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800-AR-1. RECORDS RETENTION SCHEDULE

How To Use The Records Retention Schedule

The Records Retention Schedule lists 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, retention period, and disposal code. The following information will assist in applying this schedule.

Record Formats

Media codes are used to identify the format(s) that the District may choose to maintain specified records and are assigned as follows:

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

Retention Periods

Retention periods listed on the schedule are given in years, unless otherwise indicated. Upon expiration of the retention period, all identified records will be disposed of in accordance with Board policy and this schedule.

Disposal Codes

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 privileged, confidential, exempt or sensitive information that requires special handling by shredding, burning, erasing or any other method that reduces information to an illegible condition.
3. Archival Retention – Records requiring permanent retention or records that have sufficient archival or historic value must be preserved in perpetuity.
4. 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

Record Description	Record Format	Retention Period (in years)	Disposal Code
Administrative Records			
Feasibility Studies	A,C	3	1,4
PSSA Results	A,C	Permanent	3

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 3

Record Description	Record Format	Retention Period (in years)	Disposal Code
Public Record Requests	A,C	1 from date received ⁱ	1,4
School District Report Cards	A,C	Permanent	3
Strategic Plan	A,C	One (1) copy permanent	3
Benefits/Insurance Recordsⁱⁱ			
Claims	A,C	6 after settlement	2,4
COBRA Records	A,C	6 ⁱⁱⁱ	
Enrollment Forms	A,C	term of benefits plus 6	2,4
Policies/Plans/Contracts	A,C	6 after expiration	1,4
Child Labor Records			
Applications for Work Permits	A,C	2 after graduation	2,4
Employment Report from Employers	A,C	2 ^{iv}	2,4
Complaints/Challenges			
Investigation Records	A,C,D,E,F	6 after final resolution	2,4
Made By District Employee(s)	A,C	6 after final resolution ^v	2,4
Regarding District Employee(s)	A,C	6 after employment ends	2,4
Regarding Instructional Materials or District Programs	A,C	6 after final resolution	1,4
District Organization Records			
District Boundaries/Attendance Areas	A,C,E	Permanent	3
Photographs/Movies of Historical Value	C,D,F	Permanent	3
Employment Contracts			
Administrative Compensation Plan	A,B,C	One (1) copy permanent	3
Collective Bargaining Agreements	A,B,C	One (1) copy permanent	3
Individual Employment Contracts/Board Resolutions	A,C	4 after employment ends	1,4
Facility Use Records			
Applications	A,C	6	1,4
Fee Schedule(s)	A,C	Current	1,4
Financial Records^{vi}			
Accounts Payable	A,C	6	1,4
Accounts Receivable	A,C	6	1,4
Adopted Annual Budget	A,B,C	10	1,4

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Record Description	Record Format	Retention Period (in years)	Disposal Code
Annual Financial Reports	A,B,C	Permanent	3
Annual Audit Reports	A,B,C	Permanent	3
Bank Statements	A,C	6	1,4
Check Registers	A,C	6	1,4
Deposit Slips	A,C	6	1,4
General Ledger	A,B,C	Permanent	3
Grant Records (Successful)	A,C	6 after close of grant	1,4
Investment Records	A,B,C	6 after cancellation	1,4
Purchase Orders/Invoices	A,C	6	1,4
Tax Collection Records	A,C	6	1,4
Free and Reduced Lunch Program Records^{vii}			
Accounts/Audits	A,C	5	1,4
Application for Participation ^{viii}	A,C	5	2,4
Program Requirements	A,C	5	1,4
Grievances/Arbitrations			
Complaint	A,B,C	Permanent	3
District Response	A,B,C	Permanent	3
Final Ruling/Decision of Arbitrator	A,B,C	Permanent	3
Litigation Files			
Pleadings, Motions, Briefs, Other Filings	A,B,C	7 after final conclusion of litigation	1,4
Decision/Ruling	A,B,C	7 after final conclusion of litigation	1,4
Medical Records			
Medical Documentation (Employee Leave, Accommodations)	A,C	6 after employment ends	2,4
Medical Records/Information (Employee)	A,C,D,F	6 after employment ends ^{ix}	2,4
Medical Records/Information (Employee Exposure to Toxic/Harmful Substances)	A,C,D,F	30 after employment ends ^x	2,4
Medical Records/Information (Student)	A,C,D,F	2 after enrollment ends ^{xi}	2,4
Pre-Employment Medical Examination ^{xii}	A,C	6 after employment ends ^{xiii}	2,4

Record Description	Record Format	Retention Period (in years)	Disposal Code
Payroll Records^{xiv}			
Deduction Authorizations	A,C	6	2,4
Direct Deposit Forms	A,C	6	2,4
Employee Earnings Statements (Pay Stubs)	A,C	6 ^{xv}	2,4
Time Cards/Sheets	A,C	6 ^{xvi}	1,4
Wage and Tax Statements (W-2 Forms)	A,C	6 ^{xvii}	2,4
Withholding Allowance Certificates (W-4 Forms)	A,C	6 after superseded OR employment ends ^{xviii}	2,4
Personnel Records^{xix}			
Acknowledgement of Receipt (Handbooks/Policies)	A,C	6 after superseded OR employment ends	1,4
Advertised Job Openings/Postings	A,C	4 after position filled ^{xx}	1,4
Attendance Records (Employees)	A,C	6 after employment ends	1,4
Background Check Documentation ^{xxi}	A,C	6 after employment ends	2,4
Change(s) in Status (Promotion/Demotion/Transfer/Furlough/Recall)	A,C	6 after employment ends ^{xxii}	2,4
Continuing Education/Professional Development	A,C	6 after employment ends	2,4
Credentials (Certificates/Licenses)	A,C	6 after employment ends	1,4
Discipline Records (Employees)	A,C	6 after employment ends	2,4
Employment Application/Resume (Hired)	A,C	6 after employment ends	2,4
Employment Application/Resume (Not Hired)	A,C	4 after position filled ^{xxiii}	2,4
Employment Eligibility Verification (Form I-9 and Documentation)	A,C	6 after employment ends ^{xxiv}	2,4
Equal Employment Opportunity Reports and Demographics	A,C	3 ^{xxv}	1,4
Evaluations (Employees)	A,C	6 after employment ends	2,4
Job Description	A,C	6 after employment ends	1,4
Leave Records (FMLA) ^{xxvi}	A,C	6 after employment ends ^{xxvii}	2,4
Leave Records (Other)	A,C	6 after employment ends	2,4
Offer of Employment (Accepted)	A,C	6 after employment ends	1,4
Pre-Employment Reference Checks ^{xxviii}	A,C	6 after employment ends	2,4
Resignations	A,C	6 after employment ends	1,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 6

Record Description	Record Format	Retention Period (in years)	Disposal Code
Retirement Records	A,B,C	Permanent	3
Training Certificates/Information	A,C	6 after employment ends	1,4
User Agreement(s)	A,C	6 after employment ends	1,4
Property Records			
Building Blueprints	C,E	Permanent	3
Construction Contracts	A,B,C	12 after completion ^{xxxix}	1,4
Deeds and Related Records	A,B,C	Permanent	3
Equipment Inventories	A,C	6	1,4
Fixed Asset List	A,B,C	Permanent	3
Inventory Transfer/Disposal Records ^{xxx}	A,C	5 after transfer/disposition	1,4
Leases (Real Estate)	A,B,C	Permanent	3
Leases (Equipment/Vehicles)	A,B,C	6 after expiration	1,4
Pesticide Application Record	A,C	3 ^{xxxix}	1,4
Real Property Purchase or Sale	A,B,C	Permanent	3
Purchasing Records (Goods and Services)			
Advertisements	A,C	6 after completion	1,4
Bid Documents (Accepted)	A,C	6 after completion	1,4
Bid Documents (Declined)	A,C	3 after completion	1,4
Executed Contracts	A,C	6 after completion	2,4
Financial Information of Bidders	A,C	3 after completion	2,4
Specifications	A,C	6 after completion	1,4
Written or Telephonic Price Quotations	A,C	3 after completion ^{xxxii}	1,4
Safety Records			
Accident Reports	A,C	6 ^{xxxiii}	2,4
Emergency Preparedness Plan	A,C	2 after revised ^{xxxiv}	1,4
Material Safety Data Sheets (MSDS)	A,C	30 ^{xxxv}	1,4
Safe School Act Reports	A,B,C	Permanent ^{xxxvi}	3
Visitor Registration	A,C	5	1,4
School Board Records			
Board Meeting Agendas	A,C	1	1,4

Record Description	Record Format	Retention Period (in years)	Disposal Code
Board Minutes (Approved)	A,B,C	Permanent ^{xxxvii}	3
Board Policies and Procedures (Current)	A,B,C	Permanent	3
Board Policies and Procedures (Old)	A,B,C	Permanent	3
Ethics Statement of Financial Interest	A,C	5 ^{xxxviii}	1,4
Notes, Recordings and/or Any Other Materials Used to Prepare Official Minutes	A,C,D	Until official minutes are approved	1,4
Official Recordings of Board Meetings	C,D	1	1,4
Student Records	Refer to Student Records Plan^{xxxix}		
Transportation Records (Drug/Alcohol Testing)^{xi}			
Negative or Below Limit Test Results	A,C	1	2,4
Positive or Above Limit Test Results	A,C	5	2,4
Records Related to Collection Process	A,C	2	2,4
Records Related to Education and Training	A,C	2 after employment ends	2,4
Refusal to Take Required Test	A,C	5	2,4
Universal Service Records (E-Rate Program)^{xli}			
Applications/Discount Verifications/Correspondence	A,C	5 after service year	2,4
Bids/Quotations (accepted/declined); Correspondence; Financial Information of Bidders; Specifications/RFPs; Bid Evaluations	A,C	5 after service year	2,4
Executed Contracts	A,C	5 after service year	2,4
Filtering Documentation	A,C	5 after service year	2,4
Proof of Payment – Submitted and Received	A,C	5 after service year	2,4
Purchase Orders/Installation Records/Invoices	A,C	5 after service year	2,4
Staff Training	A,C	5 after service year	1,4
Technology Plan	A,C	5 after service year	1,4
Workers' Compensation Records	A,B,C	7 after claim closed	2,4

ⁱ 65 P.S. Sec. 67.502(b)(2)(iii) requires that an electronic or paper copy of the written request and all documents submitted with the request be maintained either 1) until the request has been fulfilled; 2) if the request is denied, for thirty (30) days; or 3) if an appeal is filed, until a final determination is made or the appeal is

deemed denied. Keeping from 1 year of date request received would be safe for all periods in the Act, establish some precedent for the open records officer, and give evidence of repeated requests (burdensome). 67.506(a).

ⁱⁱ 29 CFR Sec. 1627.3(b)(2) requires employers to keep “benefit plans” for the term of the plan plus at least 1 year after termination.

ⁱⁱⁱ Retention period not specified in COBRA but recommended that records be retained in accordance with ERISA, See 29 U.S.C. Sec. 1027.

^{iv} 43 P.S. Sec. 58.1(d) requires school Districts to keep the required employment report/information for 2 years.

^v 29 CFR Sec. 1602.14 and 1627.3(b)(3) require retention of relevant records until final disposition.

^{vi} SC 518 requires permanent retention of annual auditor’s reports and annual financial reports. SC 518 also requires Districts to maintain all other financial records for at least 6 years.

^{vii} 7 CFR Sec. 210.9 requires free and reduced lunch accounts and records to be maintained for a minimum of 3 years. If a federal audit is being conducted, records must be kept until the audit is completed. SC 1337(e) requires free and reduced lunch accounts and records to be maintained not in excess of 5 years.

^{viii} 47 CFR Sec. 54.516 requires a school District who uses free/reduced-price meal applications as the basis for their federal Universal Service funding under the E-Rate program to retain these applications for 5 years.

^{ix} 29 CFR Sec. 1627.3 (b)(1)(v) requires the results of any physical examination to be kept for at least 1 year from the date of the personnel action which the records relate when the exam results are considered in connection with any personnel action. If an enforcement action is under way, the required records shall be maintained until final disposition.

^x 29 CFR Sec. 1910.1020(d)(1)(i) requires the retention of “employee medical records” for at least the duration of employment plus 30 years. 29 CFR Sec.

1910.1020(d)(1)(ii) requires the retention of “employee exposure records” for at least 30 years. Terms are defined in 29 CFR Sec. 1910.1020(c)(5), (6). See 29 CFR Sec. 1910.1020(b) for applicability.

^{xi} SC 1409 requires that all student health records be confidential and not destroyed for at least 2 years after the student is no longer enrolled. The school may surrender the health records to the parent/guardian if the student will not be enrolling in another school in Pennsylvania. 28 PA Code Sec. 23.55 requires the student’s health records be maintained in the school building that the student attends.

^{xii} 42 U.S.C. Sec. 12112(d)(3)(B), 29 CFR Sec. 1630.14(c)(1) requires that this information be collected on separate forms, kept in separate files and be treated as confidential medical records.

^{xiii} 29 CFR Sec. 1627.3 (b)(1)(v) requires the results of any physical examination to be kept for at least 1 year from the date of the personnel action which the records relate when the exam results are considered in connection with any personnel action. If an enforcement action is under way, the required records shall be maintained until final disposition.

^{xiv} 29 CFR Sec. 516.5, 516.6, 1620.32 and 1627.3(a) require retention of specified payroll records/information for at least 1-3 years. SC 518 requires retention of financial records for at least 6 years.

^{xv} 29 CFR Sec. 516.6(c)(1) requires retention of records of additions to or deductions from wages paid for at least 2 years.

^{xvi} 29 CFR Sec. 516.6(a)(1) requires retention of time cards/sheet for at least 2 years when used to determine pay period earnings or wages.

^{xvii} 26 CFR 31.6001.1(e)(2) requires the retention of tax records for at least 4 years after the due date of the tax for the return period that the records relate or the date the tax is paid, whichever is later.

^{xviii} 26 CFR 31.6001.1(e)(2) requires the retention of tax records for at least 4 years after the due date of the tax for the return period that the records relate or the date the tax is paid, whichever is later.

^{xix} 29 CFR Sec. 1602.14 requires employers to keep any personnel or employment records for at least 1 year from the date of making the record or the personnel action involved, whichever is later. If a claim is filed or action is under way, the relevant records shall be maintained until final disposition.

^{xx} 29 CFR Sec. 1627.3 (b)(1)(vi) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition.

- ^{xxi} 22 PA Code Sec. 8.2(d) states that criminal history information is confidential and not available to anyone not involved in hiring decision. 23 Pa C.S.A. Sec. 6344.2. 55 PA Code Sec. 3490.132 requires an administrator to keep the clearance statement in the employee's file.
- ^{xxii} 29 CFR Sec. 1627.3 (b)(1)(i) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition. Statute of limitations under 42 U.S.C. 1981 is 4 years.
- ^{xxiii} 29 CFR Sec. 1627.3 (b)(1)(i) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition. Statute of limitations under 42 U.S.C. 1981 is 4 years.
- ^{xxiv} 8 U.S.C. Sec. 1324a(b)(3) and 8 CFR Sec. 274a.2(b)(2)(i)(A) requires retention for 3 years after the date of the hire or 1 year after the date the individual's employment is terminated, whichever is later.
- ^{xxv} 29 CFR Sec. 1602.39, 1602.41 requires form EEO-5 and records necessary to complete EEO-5 to be maintained for 3 years. 1602.40 lists personnel records that must be kept for 2 years.
- ^{xxvi} 29 CFR Sec. 825.500(g) requires medical records and documents created for FMLA purposes be maintained as confidential medical records in separate files from the usual personnel files.
- ^{xxvii} 29 CFR Sec. 825.500(b) requires specified FMLA records to be kept for no less than 3 years.
- ^{xxviii} 43 P.S. Sec. 1321 defines "personnel file" to exclude "letters of reference".
- ^{xxix} 42 Pa. C.S.A. Sec. 5536 states that civil actions regarding construction projects must be commenced within 12 years after completion of the construction.
- ^{xxx} 47 CFR Sec. 54.516 requires school Districts to maintain records on equipment funded through the federal E-Rate program for Universal Service for at least 5 years from the date of the funding year's purchase; records should indicate the disposal method or document information regarding the transfer.
- ^{xxxi} SC 772.2(b)(2) requires each school to maintain detailed records of all chemical pest control treatments for at least 3 years.
- ^{xxxii} SC 751 and 807.1 require the retention of written price quotations and written records of telephonic price quotations for 3 years.
- ^{xxxiii} 29 CFR Sec. 1904.33(a) requires the retention of the OSHA incident report forms for 5 years following the end of the calendar year that the records cover.
- ^{xxxiv} 35 Pa. C.S.A. Sec. 7701(g) requires plan to be reviewed annually and updated as necessary.
- ^{xxxv} 29 CFR Sec. 1910.1020(c)(5) defines "employee exposure records" to include material safety data sheets (MSDS) indicating that the material may pose a hazard to human health. See 29 CFR Sec. 1910.1020(d)(1)(ii) for exceptions and alternate records.
- ^{xxxvi} SC 1317.2 (BEC) Sec. IV issued July 1 2002, SC 1307-A also requires school entities to maintain records of all applicable incidents but does not list retention period(s).
- ^{xxxvii} SC 518 requires permanent retention of the "minute book" of each District.
- ^{xxxviii} 65 Pa. C.S.A. Sec. 1107(9) requires the retention of financial interest statements for 5 years from date of receipt.
- ^{xxxix} 22 PA Code Sec. 12.32 requires each District to develop a plan for the collection, maintenance and dissemination of student records.
- ^{xl} 49 CFR 382.401 lists applicable retention periods. 49 CFR 382.405 puts limits on release of records.
- ^{xli} 47 CFR Sec. 54.516 requires school Districts who receive federal Universal Service funding through the E-Rate program to retain all related documentation for at least 5 years after the last day of service delivered in a particular funding year.

ADMINISTRATIVE REGULATION

CENTENNIAL SCHOOL DISTRICT

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800-AR-2. LITIGATION HOLD

When the District receives notice that the District is involved in litigation as a party to a lawsuit, the District is issued a subpoena by a party to a lawsuit in which it is not a party, an investigation concerning the District has commenced or may commence, or the District receives information that would lead a reasonable person to anticipate the possibility of litigation, the District will immediately take steps to ensure that any records and data that could be related to the ongoing litigation/investigation or potential litigation/investigation are preserved from deletion or destruction.

Actions to preserve records and data will include, but not be limited to, postponing or canceling any automatic deletion of electronically stored information until relevant information and documents can be identified and stored, notifying employees of a litigation hold to prevent the deletion and destruction of records and data that might be related to the litigation/investigation or potential litigation/investigation, and identifying records and data that are subject to preservation.

A litigation hold triggers the duty to preserve records and data that could otherwise be deleted or destroyed under the District's Records Management Plan.

The District solicitor(s) will be responsible for issuing a litigation hold that specifically describes the types of records and data that must be preserved and describes how those materials are to be maintained and stored. The litigation hold will be sent directly to the Superintendent, who will acknowledge receipt of the litigation hold. The litigation hold may be communicated initially by phone but will be followed by a written notification (fax, email or letter).

The Superintendent, in consultation with the District solicitor(s), will decide which records and data are subject to the litigation hold and in which form the records will be retained or produced. The Superintendent will be responsible for:

1. Coordinating the collection and preservation of records and data that are subject to the litigation hold.
2. Monitoring and ensuring the District's compliance with the litigation hold.
3. Checking periodically on the status of a litigation hold.

4. Ensuring that all steps taken by the District to identify and preserve relevant records and data are documented.

The solicitor will inform the Superintendent of changes as they occur.