Records Management

Record Retention and Management Administrative Regulation

The School District receives and generates volumes of information in both electronic form and hard copy. Not all information received constitutes a "record" that the District will retain for an extended period. The various departments of the School District have set forth guidelines to assist employees in determining what information/documents/data should be retained and what information/documents/data need not be retained and creating guidelines for appropriate uses of particular means of communication. The purpose of this Regulation is to clarify how records will be retained and destroyed.

For the purposes of this Regulation "reasonably accessible" shall mean that the information is available to authorized District personnel in a manner and format that is generally indexed or cataloged or is readily searchable for ease of reference.

A. Retention, Storage and Destruction of Records

The Record Retention Schedule and Statutory Authority attached hereto as Attachment A and incorporated herein sets forth the manner of record retention, the retention period and the manner of disposal of various types of District records. Any records not specifically identified on the chart shall be referred to the appropriate District-level administrator for review.

The District may convert records that it is required to maintain to electronic form and retain them electronically if (1) the recording process accurately reproduces the original, (2) the recording process forms a durable medium for recording, storing and reproducing the original and (3) the recording process is in accordance with standards, policies and procedures promulgated by the Local Government Records Committee attached to this Regulation as Attachment B.

B. Archiving/Purging of Electronic Information that Is Not Retained Electronically

Deleted electronically stored information will be automatically purged from the system at least once annually, unless a litigation hold prompts retention of certain information. Information contained on the archive/back up system is not intended to be indexed or cataloged and is not intended to be accessible for reasons other than emergency system failure. Any requests to access information on the archive/back up system must be submitted to the Superintendent or the Superintendent's designee for approval.

C. Legal Hold Procedures

When the school District believes that a matter is likely to lead to litigation by or against the School District, a "legal hold" will be placed on such relevant matters, requiring that documents and data, including electronic data, relating to the matter, incident, person or entity, be retained by the School District until such time as the legal hold is lifted.

1. Responsibility

Because of the variety of matters that could lead to litigation by or against the School District, the responsibility to identify such matters rests with all District employees.

- 2. Procedure When a School District employee has reason to believe that an incident may give rise to potential litigation, that employee shall:
 - a. Advise their immediate supervisor, the building supervisor, and/or the specific central administrator of the incident and prepare a written report stating the what the individual saw and/or heard, the names of the people and entities involved and the names of any witnesses;
 - b. Preserve all documents, notes, data and information regarding the matter including, but not limited to email communications, notes, letters and voice mail messages, pending a determination regarding whether a legal hold is necessary.

The written report must then be forwarded to the Superintendent or the Superintendent's designee, who, in consultation with the Solicitor, will determine whether to place a legal hold on documents and data relevant to the incident(s). If a legal hold is implemented, then the Director of Educational Program shall make all reasonable efforts to retrieve and maintain any archived electronic data before that data is purged and to prevent further potentially relevant information from being purged or deleted.

The Superintendent or the Superintendent's designee will advise all School District employees involved with the incident(s) or matter(s) at issue of the legal hold and advise them to retain all documents, notes, data and information regarding the matter including, but not limited to email communications, notes, letters and voice mail messages pending further notice.

3. Release of Legal Hold

If a matter is settled or resolved or the relevant statute of limitations has run or it otherwise becomes apparent that litigation is not likely to arise, then the Superintendent or the Superintendent's designee, in connection with the Solicitor, will release the legal hold and the retained and stored documents may be disposed of in accordance with the ordinary document retention policies of the District.

D. Destruction

Records shall be purged in accordance with the document retention schedule attached hereto.

E. Responsibility

Periodically, the Superintendent shall designate the Controller and one other individual to perform audits to ensure that (1) information being retained in manual form is being retained in a reasonably accessible manner, (2) information being retained in electronic form is being retained in a reasonably accessible manner, (3) confidential information is being maintained in a secure manner and (4) electronic and manual records are being retained and purged in accordance with this Regulation.

Adopted: April 17, 2008 Revised: September 22, 2008 Revised: August 17, 2010 Revised: March 1, 2018 Revised: January 5, 2021 Revised: August 16, 2023

ATTACHMENT A - RECORD RETENTION SCHEDULE

Description	Format	Retention Period	Disposal
Accident Reports		5 years	1
Accounts Payable/Receivable		6 years	1
Act 48 Attendance Documentation		3 years	2
Annual Budget		10 years	1
Annual Financial Reports		Permanent	3
Annual Audit Reports		Permanent	3
Bank Statements, Check Registers, Deposit Slips		6 years	1
Bids – Accepted		6 years after end of	1
-		project	
Bids – Rejected		6 years after end of	1
		project	
Board Minutes		Perpetual	3
Board Policies – Current		Perpetual	3
Board Policies – Former		Perpetual	3
Budget Worksheets		1 year after adoption	2
Collective Bargaining Agreements		3 years after	1
		expiration	
Construction Contracts		12 years after	1
		termination	
Correspondence from Superintendent		Permanent	3
Emergency Preparedness Plan		2 years after revision	1
Ethics- Statements of Financial Interest		5 years	1
Employee Records – criminal background,		7 years after end of	2
discipline, grievances, complaints,		employment	
resignation/retirement			
Employee records – other – application,		4 years after end of	2
attendance, evaluations, leave, medical, pre-		employment	
employment medical exam, pre-employment			
references, professional development, contracts,			
W-2s, W-4s			
Equal Employment Opportunity Reports		3 years	1
Facilities – Equipment Inventories, Use Files,		6 years	1
Equipment Leases, Pesticide Application Record			
Facilities –Fixed Asset List		Permanent	3
Free and Reduced Lunch		5 years	2
General Ledger		Permanent	3
Insurance Claims and Policies		6 years after	1
		settlement/expiration	
Investment Records		6 years after	1
		cancellation	
Litigation/Workers' Compensation Files		7 years after	2
		conclusion of	
		litigation	

Payroll Records	6 years	2
Press Releases	Permanent	
Property Records – Deeds, Easements, Leases,	Permanent	3
Purchase/Sale		
Purchase Orders	6 years	1
Safe School Act Reports	Permanent	3
Student Records	See Board Policy	2
	and Administrative	
	Regulation 5225	
	(Student Records)	
Tax Collection Records – Property	6 years from date of	1
	payment	
Tax Collection Records – Other	6 years from date of	2
	payment	

Disposal Codes

- Routine no special precautions Special confidential records which must be destroyed in a secure manner Archival no destruction
- 1. 2. 3.

г

RECORD RETENTION - STATUTORY AUTHORITY

Statute	Records to be Retained
Fair Labor Standards Act	a. Basic records containing employee information, payrolls, individual contracts, or collective bargaining agreements, applicable certificates and notices of Wage-Hour administrator, sales and purchase records.
	b. Supplementary basic records including basic employment and earnings records; wage rate tables; work time schedules; order shipping, and billing records; records of additions to or deductions from wages paid; documentation of basis for payment of any wage differential to employees of the opposite sex in the same establishment.
	c. Certificates of age.
	d. Written training agreements
Title VII of Civil Rights Act	a. Any personnel or employment record made or kept by employer, including application forms and records having to do with hiring, promotion, demotion, transfer, layoff, or termination, rates of pay or other terms of compensation, and selection for training or apprenticeship.
	b. Personnel records relevant to charge of discrimination or action brought by Attorney General against employer, including, for example, records relating to charging party and to all other employees holding similar positions, application forms or test papers completed by unsuccessful applicants and by all other candidates for same position.
	c. (Employers with 100 or more employees)
	Copy of EEO-1 – Employer Information Report.
Executive Order 11246	Written affirmative action programs and supporting documentation including required utilization analysis and evaluation; other records and documents relating to compliance with applicable EEO nondiscrimination and affirmative action requirements, including records and documents on nature and use of tests, validation of tests, and test results as required; and relating to compliance with construction industry EEO plans and requirements.
Age Discrimination	a. Payroll records containing each employee's name, address, date of birth, occupation, rate of pay, and compensation earned per week.
Act	b. Personnel records relating to
	 (1) job applications, resumes, or other replies to job advertisements, including applications for temporary positions and records pertaining to failure to hire; (2) promotion, demotion, transfer, selection for training, layoff, recall, or discharge; (3) job orders submitted to employment agency or union; (4) test papers in connection with employer-administered aptitude or other employment test; (5) physical examination results; (6) job advertisements or notices to employees regarding openings, promotions, training programs, or opportunities for overtime work.

	c. Employee benefit plans, written seniority or merit rating systems.	
Vocational	(Federal contractors, subcontractors)	
Rehabilitation	For handicapped applicants, and employees, employment records and records	
Act	regarding complaints and actions taken under the Act.	
Vietnam Era	(Federal contractors, subcontractors)	
Veterans' Act	a. Copies of reports made to state employment service regarding number of	
	individuals and veterans hired, and related documentation such as personnel	
	records regarding job openings, recruitment, and placement.	
	b. Records regarding complaints and actions taken under the Act.	
Pennsylvania	a. A record of each employee showing name, address, including zip code.	
Fair Labor	b. Time of day and day of week employee's work week begins.	
Standards Act	c. Number of hours worked daily and weekly.	
Standards Tiet	d. Total daily or weekly straight time earnings.	
	e. Total overtime excess compensation for work week (amount over and above	
	all straight-time earnings).	
	f. Total additions to or deductions from wages of each pay period. The	
	employer is required to maintain individual employee accounts recording the	
	dates, amounts, nature of times added or deducted.	
	g. Allowances, if any, claimed as part of minimum wage.	
	h. Money paid in cash.	
	i. Total wages paid each pay period.	
	j. Date of payment and the pay period covered by payment.	
	k. Special certificate for students, apprentices, and learners.	
	1. Regular hourly rate of pay.	
	m. Occupation	
Pennsylvania	a. Every contractor and subcontractor in a public works contract shall keep	
Public Works	accurate records showing name, craft, and hourly rate paid to each workman	
Statute	employed by it in connection with the public works.	
Pennsylvania	a. Any records, documents, and data pertaining to the employment, transfer,	
Human	promotion, or dismissal of employee.	
Relations Act	b. All company applications for employment, as well as forms filled out by	
	unsuccessful applicants.	
OSHA	a. Employers in general industry are required pursuant to 45 F.R. 35212 to	
Regulations	preserve and maintain certain exposure and medical records pertinent to an	
U	employee's occupational exposure to toxic substances and harmful physical	
	agent.	
Administrative	a. Records showing that school authorities and/or other persons having	
Code of 1929,	knowledge or suspicion of any communicable disease reported such	
1956, as	knowledge to the local board or Department of Health.	
amended	knowledge to the local board of Department of Health.	
Child	Records of administrators, school teachers, school nurses, social service	
Protective		
	workersor mental health professionals reporting situations when they come	
Services	into contact with children when they have reason to believe, on the basis of	
	their medical, professional, or other training experience that the child coming	
	before them in their professional or official capacity is an abused child. The	

rt 1
ee
he
ver
•
,
an
te
)
f
or
al
ne
IS
ie
t
ne
val
ıch
on

	school service and salary record, including credited school or creditable non- school service, and in the case of the death of the member, the employer shall notify the board. The retirement board will issue requirements from time to time regarding the maintenance and preservation of such records.
Documents	a. Documents relating or even remotely relating to announced or anticipated
Relating to	litigation.
Litigation	
Other Records	a. Bond records.
which should	b. Minute books.
be Permanently	c. Annual financial reports.
Kept	d. Audit reports.
	e. Important cancelled checks.

	f. Deeds to property.g. Papers evidencing title to property.
	h. Property appraisals.
	i. Insurance policies and records.
	j. Plans relating to real property.
	k. Legal correspondence.
	1. Collective bargaining agreements.
Seven Year	a. Accident reports and claims.
Records	b. Scrap and salvage records.
	c. Bills of lading.
	d. Freight bills.

ATTACHMENT B - STANDARDS, POLICIES AND PROCEDURES PROMULGATED BY THE LOCAL GOVERNMENT RECORDS COMMITTEE

(a) Authority

These standards and procedures were adopted by the Local Government Records Committee in accordance with the Municipal Records Act.

(b) Purpose

The standards and procedures are designed to help ensure the accuracy, usability, longevity, and legal acceptance of electronic records generated by municipal offices.

(c) Scope

These standards and procedures establish the basic requirements relating to the creation, maintenance, use and disposition of electronic records. 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 as defined in the Municipal Records Act. This includes, but is not limited to: magnetic media such as computer tapes, disks, diskettes and other electronic storage devices containing records. These requirements apply to all electronic records systems, whether microcomputers, minicomputers or mainframe computers, in network or stand-alone configurations. The guidelines apply to all municipal officers covered by the Municipal Records Act. Policy and guidelines for the retention and disposition of municipal records copied onto optical imaging systems and stored on optical disks are not included in this chapter but are covered under the Policy and Guidelines for the Retention and Disposition of Original Municipal Records Copied Onto Optical Imaging Systems...

(d) Responsibilities of Municipal Officers

Municipal officers shall ensure that the management of electronic records incorporates the following elements:

- (i) Assigning responsibility to develop and implement a program for records created, received, maintained, used, or stored on electronic media.
- (ii) Integrating the management of electronic records with other records and information resources of the municipality and incorporating electronic records management responsibilities into any pertinent municipal policies or directives.
- (iii) Establishing procedures for addressing records management requirements, including record disposition schedules promulgated by the Local Government Records Committee, before approving new electronic records systems or enhancements to existing systems.
- (iv) Ensuring that adequate training is provided for users of electronic records systems in the operation, care and handling of the equipment and software.

- (v) Developing and maintaining adequate and up-to-date documentation about each electronic records system. Documentation should: list system title and responsible municipal office; specify all technical characteristics necessary for reading or processing the records; identify all defined inputs and outputs of the system; define the contents of the system, including record formats and data base tables; identify vital records and information; determine restrictions on access and use; describe update cycles or conditions and rules for adding information to the system, changing information in it or deleting information; and facilitate the timely, authorized disposition of the records in accordance with the Municipal Records Manual.
- (vi) Specifying the location, manner, and media in which electronic records will be maintained to meet operational and archival requirements, and maintaining inventories of electronic records systems to facilitate disposition.
- (vii) Ensuring that compliance with municipal electronic records procedures are applied to municipal electronic records created or maintained by contractors.
- (viii) Reviewing electronic systems periodically for conformance to procedures described in the Municipal Records Manual to ensure that record descriptions and retention periods reflect changes as the Municipal Records Manual is updated.

(e) **Procedures**

(i) Creation and Use of Data Files

- A. For electronic records systems that produce, use, or store data files, disposition instructions for the data shall be incorporated into a systems design and updated as necessary.
- B. Municipal offices shall maintain proper, up-to-date technical documentation for each electronic records system that produces, uses, or stores data files. Minimum documentation required is a narrative description of the system; physical and technical characteristics of the records, including a record layout that describes each field including its name, size, starting or relative position and a description of the form of the data (such as alphabetic, zoned decimal, packed decimal or numeric); or a data dictionary or the equivalent information associated with a data base management system including a description of the relations between data elements in data bases; and any other technical information needed to read or process the records.

(ii) Creation and Use of Text Documents

Electronic records systems that maintain the official file copy of text documents on electronic media shall meet the following minimum requirements:

- A. Provide a method for all authorized users of the system to retrieve desired documents, such as an indexing or text search system.
- B. Provide an appropriate level of security to ensure integrity of the documents.

- C. Provide a standard interchange format when necessary to permit the exchange of documents on electronic media using different software/operating systems and allow for the conversion or migration of documents on electronic media from one system to another.
- D. Provide for the disposition of the documents including, when necessary, transferring records to the State Archives.
- E. Before a document is created and maintained on electronic records systems, documents shall 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 the 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). Municipal officers should ensure that records maintained in such systems can be correlated with related records on paper, microform, or other media.

(f) Legal Admissibility of Electronic Records

To enhance legal admissibility of records in an electronic format and help ensure municipal records may be used as evidence in court proceedings, trustworthiness must be established by thoroughly documenting the recordkeeping system's operation and the controls imposed upon it. To implement procedures to enhance the legal admissibility of electronic records, municipal officers should:

- (i) Document that similar kinds of records generated and stored electronically are created by the same processes each time and have a standardized retrieval approach.
- (ii) Substantiate that security procedures prevent unauthorized addition, modification, or deletion of a record and ensure system protection against such problems as power interruptions.
- (iii) Identify the electronic media on which records are stored throughout their life cycle and the maximum time span that records must remain on each storage medium in order to comply with minimum retention periods as cited in the Municipal Records Manual.
- (iv) Coordinate all of the above with legal counsel, information managers, and records management staff.

(g) Security of Electronic Records

Municipal officers shall implement and maintain an effective records security program that incorporates the following to:

- (i) Ensure that only authorized personnel have access to electronic records.
- (ii) Provide for backup and recovery of records to protect against information loss.

- (iii) Ensure that municipal personnel are trained to safeguard sensitive or classified electronic information.
- (iv) Minimize the risk of unauthorized alteration or erasure of electronic records.
- (v) Ensure that electronic record security is included in a computer systems security plan.

(h) Selection and Maintenance of Electronic Records Storage Media

Municipal officers shall select appropriate media and systems for storing records throughout their life which meet the following requirements:

- (i) Specific Requirements in selecting storage media
 - A. Permit easy retrieval in a timely fashion.
 - B. Facilitate the distinction between records and non-records as defined in the Municipal Records Act.
 - C. Retain the records in a usable format for the length of their required retention period.
 - D. When appropriate, meet requirements for transferring electronic records to the State Archives.
- (ii) The following factors shall be considered before selecting a storage media or when converting from one medium to another:
 - A. The required retention period of the records.
 - B. The maintenance necessary to retain the records in that format.
 - C. The costs of storing and retrieving the records stored in that format.
 - D. The density of the record.
 - E. The access time necessary to retrieve stored records.
 - F. The portability of the medium (selecting a medium that will run on equipment produced by multiple manufacturers) and the ability to transfer information from one medium to another as well as the flexibility of the software to be migrated into a different medium if desirable or necessary.
 - G. Compliance of the storage medium with current industry and/or Federal standards if applicable.

- (iii) Municipal officers shall avoid the use of floppy disks for the exclusive long-term storage of permanent electronic records.
- (iv) Municipal officers shall ensure that all authorized users can identify and retrieve information stored on removable disks or tapes by establishing or by adopting procedures for external labeling as well as procedures for computer tape library subsystems for storage media identification.
- (v) Municipal officers shall ensure that information is not lost because of changing technology or deterioration by converting storage media to provide compatibility with the municipality's current hardware and software. Before conversion to a different medium, municipal officers shall determine that the authorized dispositions of the electronic records can be implemented after conversion.
- (vi) Municipal officers should back up electronic records on a regular basis to safeguard against the loss of information due to equipment malfunctions or human error. Duplicate copies of permanent records should be maintained in separate buildings. All security copies of vital electronic records, regardless of retention period, should be stored in a separate building.
- (vii) For the maintenance of magnetic computer medium, municipal officers shall follow industry and national standards for safeguarding information.
- (viii) Maintenance of magnetic computer tape containing permanent records.
 - A. Municipal officers shall provide for the testing of magnetic computer tapes no more than six months prior to using them to store electronic records that are scheduled for permanent retention. This test should verify that the tape is free of permanent errors and in compliance with National Institute of Standards and Technology or industry standards.
 - B. Municipal officers shall maintain the storage and test areas for computer magnetic tapes containing permanent records at the following temperature and relative humidities:

Constant temperature – 62 to 68 degrees Fahrenheit.

Constant relative humidity – 35 to 45 percent.

- C. Municipal officers should rewind according to tape specifications all tapes containing permanent records every 3-1/2 years.
- D. Municipal officers shall annually read a statistical sample of all reels or cartridges of magnetic computer tape containing permanent records to identify any loss of data and to discover and correct the causes of data loss. In magnetic medium storage libraries with 1,800 or fewer reels/cartridges, a 20 percent sample or a sample size of 50 reels/cartridges, whichever is larger, should be read. In magnetic medium oibraries with more than 1,800 reels/cartridges, a sample of 384 reels/cartridges should be read. Tapes with 10 or more errors shall be

replaced and, when possible, lost data shall be restored. All other tapes which might have been affected by the same cause (i.e., poor quality tape, high usage, poor environment, improper handling) shall be read and corrected as appropriate.

- E. Municipal officers shall copy permanent data stored on magnetic tapes before the tapes are 10 years old, onto tested and verified new tapes.
- F. Municipal officers shall ensure that external labels (or the equivalent automated tape management system) for magnetic tapes used to store permanent electronic records shall provide unique identification of each reel/cartridge, including the name of the office responsible for the data, system title, and security classification, if applicable. Additionally, the following information shall be maintained for (but not necessarily attached to) each reel/cartridge used to store permanent electronic records: file title(s); dates of creation; dates of coverage; the recording density; type of internal labels; volume serial number, if applicable; number of tracks; character code/software dependency; information about block size; and reel/cartridge sequence number, if the file is part of a multi-reel/cartridge set. For numeric data files, include record format and logical record length, if applicable; data set name(s) and sequence, if applicable; and number of record for each data set.
- G. Municipal officers shall maintain proper care and handing procedures for electronic media by keeping a clean, dust-free environment for all equipment and prohibit eating, drinking or smoking in magnetic computer medium storage libraries and test or evaluation areas that contain permanent records.
- (ix) Maintenance of direct access storage media
 - A. Municipal officers shall issue written procedures which draw upon the recommendations of the manufacturers for the care and handling of direct access storage media.
 - B. Municipal officers shall ensure that external labels for diskettes or removable disks used when processing or temporarily storing permanent records shall include the following information: name of the office responsible for the records; descriptive title of the contents; dates of creation; security classification, if applicable; and identification of the software and hardware used.

(i) Retention of Electronic Records

Municipal officers shall establish policies and procedures to ensure that electronic records and their documentation are retained for the length of their required retention period. The retention procedures shall include:

- (i) Scheduling the disposition of electronic records, as well as related documentation and indexes in accordance with the Municipal Records Manual.
- (ii) Transferring a copy of the electronic records and any related documentation and indexes to the State Archived if specified in the Municipal Records Manual. (Contact the State Archives for instructions as to necessary requirements.)

(iii) Establishing procedures for regular recopying, reformatting, and other necessary maintenance to ensure the retention and usability of electronic records throughout their required retention period.

(j) Destruction of Public Records on Electronic Media

Electronic records may be destroyed in compliance with the Municipal Records Manual. Electronic records scheduled for destruction should be disposed of in a way that ensures protection of any sensitive, proprietary, or security information. Magnetic recording media previously used for electronic records including sensitive, proprietary, or security information are not to be recycled if the previously recorded information can be compromised by reuse in any way.

For additional information, contact:

Pennsylvania Historical and Museum Commission Division of Archival and Records Management Services PA State Archives Building 350 North Street Harrisburg, PA 17120-0090

(717) 783-9874 or (717) 787-3913