

SECTION: OPERATIONS

TITLE: RECORDS MANAGEMENT

ADOPTED: June 18, 2012

REVISED:

# RIVERVIEW SCHOOL DISTRICT

<p>1. Purpose</p> <p>2. Authority SC 518</p> <p>65 P.S. Sec. 67.901 Pol. 828</p> <p>3. Definitions</p>	<p style="text-align: center;">800. RECORDS MANAGEMENT</p> <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 governing the preservation and retention of records, whether in written or electronic form.</p> <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> <p>All other district records shall be retained in accordance with state and federal law and regulations and the district's Records Retention Schedule.</p> <p>All district employees shall be responsible for creating, managing, preserving and disposing of district records in accordance with the requirements of this policy and the Records Retention Schedule.</p> <p>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.</p> <p><b>Custodian</b> - the person or department responsible for controlling and retaining specific records for the applicable retention period, as set forth on the Record Retention Schedule.</p> <p><b>Electronic Mail (Email) System</b> - 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>
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<p>65 P.S. Sec. 67.102</p> <p>4. Delegation of Responsibility</p> <p>Pol. 801</p>	<p><b>Litigation Hold</b> - 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><b>Records</b> - 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 or sound recording, information stored or maintained electronically and a data-processed or image-processed document.</p> <p><b>Records Management Plan</b> - the system implemented by the district for the retention, retrieval, and disposition of all records generated by district operations.</p> <p><b>Records Retention Schedule</b> - a comprehensive listing stating retention periods and official custodians for and the proper disposition method of specific records.</p> <p><u>Records Coordinator</u></p> <p>The Superintendent shall designate a Records Coordinator, who shall be responsible for the following:</p> <ol style="list-style-type: none"> <li>1. Providing appropriate training to district personnel regarding the requirements of this policy and the Records Management Plan, including without limitation the protocols for preserving and categorizing district records and responsibilities of the staff in the event of a litigation hold.</li> <li>2. Periodically reviewing the Records Management Plan to ensure that record descriptions and retention periods are updated.</li> <li>3. Identifying, when the retention period expires, records that are to be disposed of and ensuring that all identified records are properly disposed of annually.</li> </ol> <p><u>Records Management Committee</u></p> <p>A committee responsible for the development and recommendation of the district's Records Management Plan shall be established by the Superintendent. 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, at a minimum, the following personnel:</p> <ol style="list-style-type: none"> <li>1. Open Records Officer.</li> </ol>
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<p>SC 433</p> <p>5. Guidelines</p> <p>65 P.S. Sec. 67.708 20 U.S.C. Sec. 1232g</p> <p>65 P.S. Sec. 67.102</p>	<ol style="list-style-type: none"> <li>2. Records Coordinator.</li> <li>3. Superintendent or designee.</li> <li>4. Board Secretary.</li> <li>5. District solicitor.</li> <li>6. Information Technology Director or designee.</li> <li>7. Business Manager or designee.</li> </ol> <p>The Records Management Committee shall meet periodically to evaluate the effectiveness and implementation of the Records Management Plan, including the Records Retention Schedule, and recommended changes, as needed, to the Superintendent and the Board.</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 emails. 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 the following:</p> <ol style="list-style-type: none"> <li>1. A comprehensive listing of records and data of the district and the retention periods applicable to such records (the Records Retention Schedule);</li> <li>2. Criteria to distinguish school district records from employee records;</li> <li>3. System(s) of records storage and retrieval to be used, including in what form the records will be stored, maintained, reproduced, and disposed;</li> <li>4. Preservation measures to protect the integrity of records and data;</li> <li>5. Data map or flow chart detailing the sources, routes, and destinations of electronic records;</li> <li>6. Procedures for determining whether an item is a record as that term is defined in the Right to Know Law;</li> </ol>
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7. Procedures for adding, revising or deleting records and data, and any other details necessary to implement the Records Management Plan;
8. Provisions for the storage and retrieval of records in the event of an emergency or disaster;
9. Identifying district personnel who will serve as the custodian of and/or who will otherwise be authorized to access specific district records; and
10. Procedures to be implemented in the event of a litigation hold that immediately suspends the disposition of all records relevant to a current or potential claim or investigation and ensures the preservation of such records.

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

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 Records Retention Schedule.

The Records Management Plan, and any revisions or amendments thereto, shall be approved by Board and promulgated in the form of administrative regulations to this policy.

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.

The district shall maintain the confidentiality of students' educational records in accordance with the requirements of all applicable federal and state laws.

#### 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. Up-to-date documentation should be maintained for each such manual records system, which should define the contents of the system, identify vital records and information maintained therein, and determine restrictions on access and use of such records.

<p>65 P.S. Sec. 67.506 Pol. 801</p>	<p><u>Electronic Records</u></p> <p>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.</p> <p>Electronic records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.</p> <p>The district shall develop and maintain adequate and up-to-date documentation about each electronic record system. Documentation should include the following:</p> <ol style="list-style-type: none"><li>1. List system title and responsible employee(s) or office.</li><li>2. Specify all technical characteristics necessary for reading or processing records stored on the system.</li><li>3. Identify all defined inputs and outputs of the system.</li><li>4. Define the contents of the system, including records formats and database tables.</li><li>5. Identify vital records and information.</li><li>6. Determine restrictions on access and use.</li><li>7. Describe update cycles or conditions.</li></ol> <p><u>Email Records</u></p> <p>Email messages, in and of themselves, do not constitute records. Retention and disposition of email messages depends on the function and content of the individual message. The school district does not utilize an archival email server. An email server refresh is undertaken periodically. Any staff member who has an email that is pertinent to a project, issue, etc. needs to properly archive it electronically or paper file it within the proper category of the file on the project, issue, etc.</p> <p><u>Contractors</u></p> <p>Records created or maintained by contractors employed or engaged by the Board shall be retained and disposed of in accordance with the Records Management Plan and Board policy.</p>
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Litigation Hold

Any scheduled or other disposition of records that are the subject of a litigation hold shall be immediately halted. All records that are the subject of a litigation hold shall be preserved, collected and produced in accordance with the requirements of the Records Management Plan and applicable law and regulations.

References:

School Code – 24 P.S. Sec. 433, 518

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

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, 828, 830, 912