

Warren County School District

# Records Management Plan

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Created Pursuant to School Board Policy 3221

Effective July 1, 2018

# Warren County School District Records Management Plan

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## **1. Purpose**

This Records Management Plan provides guidelines and is created pursuant to School Board Policy 3221. The purpose of these guidelines is to provide a plan for managing the District's records and to provide continuing authority to dispose of records which are no longer needed or useful to the District. Retaining only necessary electronic and physical records will reduce cost and storage space needed for record retention, and will conserve the District's resources. Moreover, this Plan provides an orderly and systematic records retention system – providing a basis for an organized and functional use of District records. All documents must exist in hard copy unless otherwise noted.

## **2. Plan Must Be Followed**

This Records Management Plan (the "Plan") can only function effectively to conserve District resources and costs if followed by all of the District's employees. This Plan establishes the minimum length of time for retention of the records identified below. No records shall be intentionally destroyed in contravention of this Plan.

## **3. Record Retention Officer**

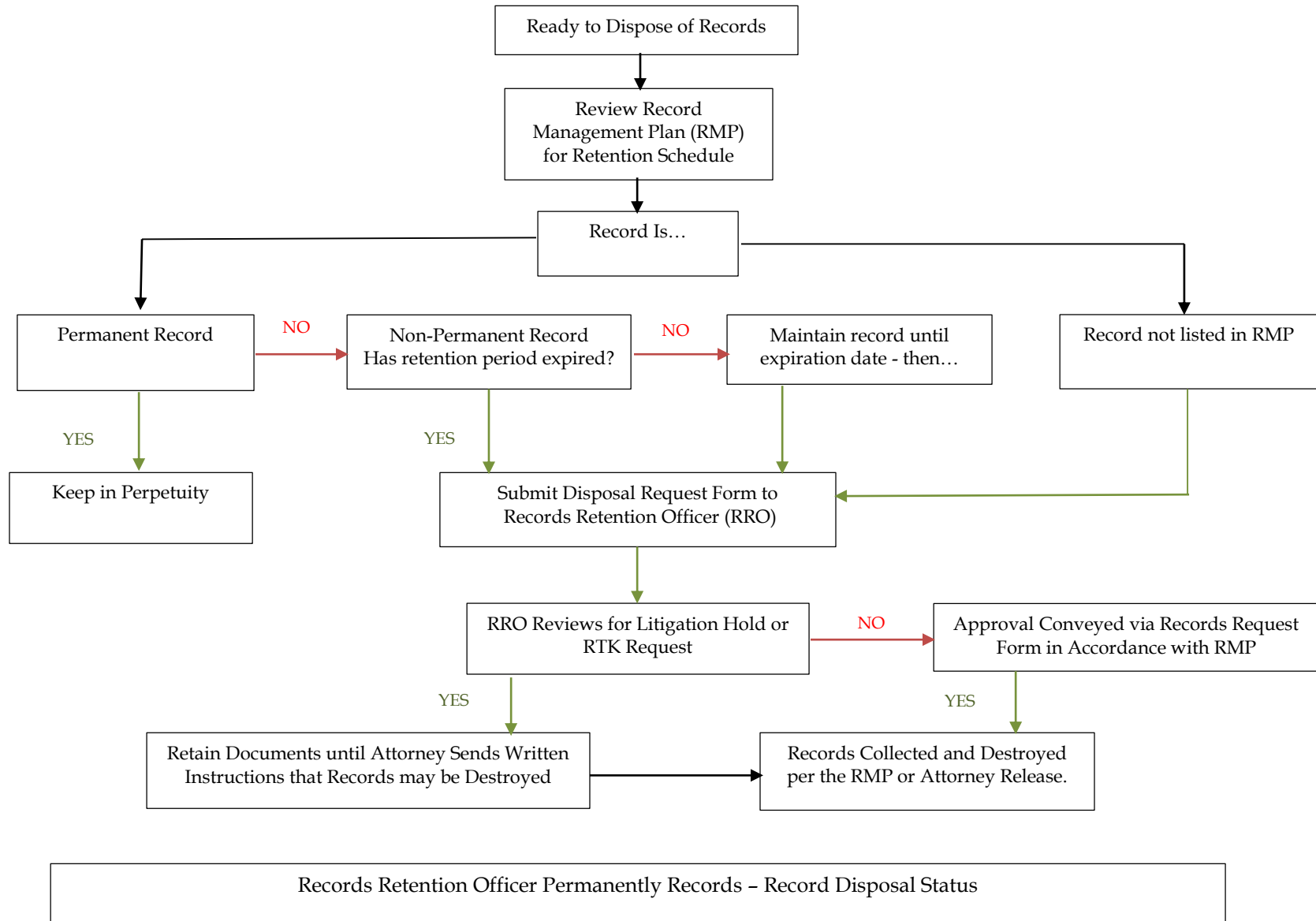
The Superintendent shall identify a "Record Retention Officer" as central point of contact for the District who will coordinate the retention and disposition of records in accordance with this Plan. No records identified herein may be destroyed without approval of the Record Retention Officer. The Record Retention Officer shall be an employee of the District and shall maintain a log of all records destroyed pursuant to this Plan.

## **4. Record Disposal Procedure**

The following procedure must be followed for the destruction of any of the records identified in this Plan.

- a) A request to dispose of a non-permanent record shall be submitted to the Record Retention Officer by the employee requesting permission to dispose of the record(s), or may be initiated by the Record Retention Office unilaterally, utilizing a Record Disposal Request Form (attached as Appendix A).
- b) The Record Retention Officer shall review the destruction request and shall grant the disposal request upon verification the applicable retention period identified herein has been met.
- c) Upon review, the Record Retention Officer shall indicate approval or disapproval on the request form and return a copy to the employee who submitted the disposal request. If approved, the employee may then destroy the records identified on the request form.
- d) If approved, the Record Retention Officer shall record the disposal of the records in the records disposal log which he or she maintains. (Attached as Appendix B)

## RECORDS DISPOSAL PROCESS



## **5. Methods of Record Disposal**

If records destroyed pursuant to this Plan contain exempt or confidential information, care must be taken to ensure the continued security and confidentiality of the information. Paper and physical records containing exempt or confidential information shall be shredded or incinerated. Electronic records containing exempt or confidential information shall be overwritten or destroyed in such a manner that exempt and confidential information may not be readily recovered. Any records stored with a vendor or contractor that are disposed of pursuant to this Plan may be destroyed directly by the vendor or contractor with written assurances the records have been destroyed.

## **6. Record Formats**

Media codes are used to identify the format(s) 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, blueprints, plans, etc.)

## **7. Record Classifications**

Public – These records will be made available for access and duplication in accordance with law, Board policy, and administrative regulations.

Exempt – These records are exempt from public access by law.

Contains Exempt Information – These records contain information that is exempt from public access by law.

Confidential – These records are exempt from public access but specifically designated as confidential or privileged by law, regulation, or court order.

## **8. Duplicate Records**

This Plan applies to any form of the records identified herein (paper, digital, microfilm, book, other electronic media, etc.) and only applies to the one official record. Duplicate copies need not be retained. Wherever practicable, the original record shall be maintained as the official record.

## **9. Retention of Records Received Via Email**

This Plan provides for the systematic retention of e-mail for a limited period of time. However, in many cases, other records identified in this Plan with longer retention periods may be received via e-mail (e.g. accident report received via e-mail; employee requests for leave; litigation records, special education records, etc.). In such a case, it is the responsibility of the employee(s) receiving the e-mail record to retain the record in accordance with this Plan, even if it requires saving the record in a format other than via e-mail.

## **10. Litigation Hold Procedures**

No record, that would otherwise be eligible for disposition pursuant to this Plan, shall be destroyed if the District becomes aware the record may be needed for pending or potential litigation.

Any District administrator, upon being notified of pending or potential litigation and/or the need to preserve certain records for litigation, shall immediately notify the Superintendent and the Records Retention Officer in writing to ensure the preservation of the proper records and suspension of any record disposal activities for the records in question. The Records Retention Officer shall coordinate with the District Solicitor or Special Counsel to put a litigation hold in place to ensure all required records are preserved for the duration of any litigation. Records retained pursuant to a litigation hold shall be retained until the final disposition of all litigation proceedings and upon the written instruction by the attorney for the District that the records may be destroyed.

## **11. Records NOT in This Plan**

Records not identified in this Plan may be disposed of without written approval by the Records Retention Officer **unless** the employee has been notified the record is subject to a litigation hold or has been notified the record is currently the subject of a Right-to-Know Request under Pennsylvania law. If the employee has been notified of such a request or litigation hold, the record shall not be destroyed except with permission by the Record Retention Officer

## **12. Interpretation**

Under certain circumstances it may be unclear which retention time period applies to a particular record. In such a case, the Records Retention Officer shall be responsible for interpreting the applicable retention period pursuant to this Plan.

## **13. Review**

The Superintendent, or his or her designee, shall ensure this Records Management Plan is reviewed regularly to ensure full compliance with mandatory legal retention periods and to ensure the Plan is achieving the Board's stated purpose enumerated above. Any suggested changes to this Plan should be submitted to the Records Retention Officer.

## **14. Calculation of Time Periods**

Each school year shall begin July 1 and end on June 30. Records may be disposed of after June 30 of the year in which the retention period expires.

Examples:

A. Records retention period is until the conclusion of the school year. Record is dated Feb 2, 2013.

Records may be destroyed as of July 1, 2013.

B. Record retention period is one year. Record is dated Feb 2, 2013.

Record may be destroyed as of July 1, 2014.

### **15. Policy Availability**

All employees shall be provided with a copy of this Records Management Plan. The Records Management Plan shall also be posted on the District's website.

### **16. Special Rules for Interpreting These Guidelines**

These procedures are intended to establish internal expectations of the District for its staff. These procedures are not intended to establish legally binding norms or enforceable rights or causes of action in any individual, including students and their parents. The intent of these procedures is to enable the District to comply with existing legal record keeping requirements without retaining unnecessary records and documents. To the extent any provision of these guidelines is determined to violate any law, the provision only shall be deemed void, and the remainder of these procedures shall remain in effect. To the extent any other administrative procedure is in conflict with the terms of this Records Management Plan, the terms of this Records Management Plan shall govern and control.

### **17. 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.

18. ADMINISTRATION RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Boundary Changes - District Map	Transportation Manager	Transp. Dept.	Public	Maps and any description of changes to District boundaries	Retain Permanently	3	A, C
B. Building sign in/sign out documentation	Building Principal	ALL	Public	Documents signed by students, parents, and other school visitors showing arrival and departure	Retain until the conclusion of the school year	1	A
C. Calendar (as adopted by School Board)	Superintendent	Supt. Office	Public	Official calendar reflecting number of days and length of school day, as well as scheduled District activities	Retain Permanently	3	A, C
D. School Census/Enrollment	Superintendent	Tech Dept.	Public	Yearly	Retain Permanently	3	A, C
E. Election Records	Board Secretary	Supt. Office	Public	Ballots or official reports, notifications, petitions, publications	Retain 1 year or 1 year after the conclusion of any challenge to election results, whichever is later	1	A
F. Correspondence/E-mail	Employees & Technology Dept.	All & Tech Dept.	Exempt	All formal and informal correspondence ( <b>including e-mails</b> ) to or from school district employees	Retain 3 years, unless the correspondence pertains to a topic that necessitates longer retention pursuant to this Plan (see Section 7 of the Administrative Regulations)	1 & 4	A, C
G. Litigation Records	Directors, Superintendent, Board Secretary	Supt.	Confidential	Records related to litigation: District, employees, or anticipated litigation for which the District has been provided written notice.	Retain 10 years from the final disposition of litigation	2	A, C



18. Administrative Records (continued)

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
H. Memoranda of Understanding (Does not include MOA's with District Labor Organizations)	Board Secretary	Supt.	Public / Contains Exempt Information	Records documenting responsibilities and relationships for multi-agency cooperatives (i.e. Vo-tech, special education placements, etc.)	Retain 5 years from the conclusion of the arrangement	2	A, C
I. Minutes	Board Secretary	Supt.	Public	Minutes of School Board and designated committee meetings	Retain Permanently	3	A, C
J. Policies	Board Secretary	Supt.	Public	Official School Board policies	Retain Permanently	3	A, C
K. Publications	Principals	All	Public	Official District publications including yearbook	Retain Permanently	3	A
L. Recordings of Board Meetings	Board Secretary	Supt.	Public	Digital and/or taped recordings of School Board and designated committee meetings	Retain pursuant to School District Policy 2345	4	C
M. Reports to State Department of Education	Directors	CO	Public	Annual or other official reports generated by the District and submitted to PDE	Retain Permanently	3	A
N. Security Recordings	Quality Assurance Supervisor	B & G	Exempt	Video, digital recordings	See Health and Safety Records	4	D
O. District Organization Records	Board Secretary	Supt.	Public	District Organization/ Consolidation - State Approvals	Retain Permanently	3	A
P. Right-to-Know	RTK Officer	Supt.	Public	Requests & Documentation	Retain 1 year	1	A, C

18. Administrative Records (continued)

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
Q. Oaths of Office (Board)	Board Secretary	Supt.	Public		Retain 6 years	1	A
R. Legal Opinions	Board Secretary	Supt.	Confidential		Retain Permanently	3	A, C
S. Resolutions	Board Secretary	Supt.	Public		Retain Permanently	3	A
T. Ethics Statement of Financial Interest	Board Secretary	Supt.	Exempt		Retain 5 years or until the next audit is complete	2	A
U. Strategic Plans	Board Secretary	Supt.	Public		Until Superseded by new plan (one copy Permanent)	3	A, C
V. Charter School Records	Board Secretary	Supt.	Public		Retain Permanently	3	A

19. BUILDING RECORDS

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Accident/Damage Reports	Principal	B & G	Exempt	Reports of damage to, or accidents with school property	Retain 10 years	2	A
B. Building Maintenance Records	Dir. Blgs & Grounds	B & G	Public	Records of any maintenance or repairs performed on buildings owned by the District	Retain until obsolete	2	A, C
C. Building and Construction Permits	Dir. Blgs & Grounds	B & G	Public	Plans, inspection reports, and applications	Retain Permanently	3	A
D. Building and Grounds Records	Dir. Blgs & Grounds	B & G	Exempt	Blueprints, specifications, abstracts, deeds, title papers, final inspection reports, and occupancy permits	Retain Permanently	3	A, C

19. Building Records (continued)

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
E. Building Equipment and Other Fixed Asset Records	Dir. Blgs & Grounds	B & G	Public	Equipment, appliances, fixtures, materials, inventories, manuals, depreciation schedules	Life of the item	1	A
F. Facility Use Records	Dir. Blgs & Grounds	B & G	Public	Applications, Fee Schedules	Retain 6 years	1	A
G. Feasibility Studies	Dir. Blgs & Grounds	B & G	Public			1	A
H. Pesticide Application Records	Quality Assurance Supervisor	B & G	Public		Retain 3 years 24 P.S. 7-772.2	2	A
I. Emergency Plan (Drill Records)	Dir. Bldgs & Grounds	B & G	Exempt		Retain Permanently	2	A
J. Vehicle maintenance & Warranty Records	Quality Assurance Supervisor	B & G	Public		As long as Vehicle is owned	1	A
K. Clean Water Documentation	Quality Assurance Supervisor	B & G	Public		Retain 3 years	2	A
L. Clean Air Documentation	Quality Assurance Supervisor	B & G	Public	40 C.F.R. Part 60 40 C.F.R. 70.6	Retain 5 years	2	A
M. Work Orders	Dir. Bldgs & Grounds	B & G	Public		Retain 1 year	1	A
N. Construction Bid Records (accepted/rejected)	Dir. Bldgs & Grounds	B & G	Public		Retain 7 years after termination of contract	1	A
O. Construction Contracts	Dir. Bldgs & Grounds	B & G & Supt.	Public		Retain 12 years after termination	1	A

19. Building Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
P. Building Key Schedules	Dir. Bldgs & Grounds	B & G	Exempt		Retain 1 year after superseded	2	A
Q. Employee Hazardous materials education documentation	Quality Assurance Supervisor	B & G	Public		Retain until superseded	2	A
R. Hazardous Materials Monitoring records	Quality Assurance Supervisor	B & G	Public		Retain 30 years 29 CFR 1910.1020; 35 P.S.7313; 34 Pa. Code 313.2	2	A
S. Materials Safety Data Sheets	Quality Assurance Supervisor	B & G	Public	Chemicals in the Workplace/Chemicals in Schools	Retain Permanently	2	A
T. Zoning Records	Dir. Bldgs & Grounds	B & G	Public		Retain Permanently	1	A
U. Safe School Act Reports	Principals & Dir. Curr. & Inst.	Curr.	Exempt		Retain Permanently Ref: SC 1307-A (BEC)	2	A

20. CURRICULUM RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Class Schedules	Principals & Dir. Curr. & Inst.	Curr.	Exempt	Schedule of classes for each school building	Retain 3 years Ref: 34 C.F.R. §80.42	2	A
B. Class Weight Schedules	Principals & Dir. Curr. & Inst.	Curr.	Public	Schedules explaining any weight given to AP or Honors classes in calculating grade point averages	Retain 21 years	1	A

20. Curriculum Records (continued)

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
C. Course Lists	Principals &Dir. Curr. & Inst.	Curr.	Public	List of middle school and high school courses with program descriptions	Retain 5 years Ref: 34 C.F.R. §80.42	1	A, C
D. Course records	Principals &Dir. Curr. & Inst.	Curr.	Public	Syllabi, course outlines and summaries, reading lists, handout materials	Retain 3 years Ref: 34 C.F.R. §80.42	1	A, C
E. Curriculum development records	Principals &Dir. Curr. & Inst.	Curr.	Public	Program information, recommendations, program details, procedures, research basis for programming	Retain 5 years	1	A, C
F. Graduation Requirements	Principals &Dir. Curr. & Inst.	Curr.	Public	List of Courses required for graduation	Retain 21 years	1	A, C
G. International Baccalaureate Documentation	Principals &Dir. Curr. & Inst.	Curr.	Exempt	Program applications, progress reports, program requirements, records of certificates awarded	Retain program requirements for 21 years. For other enumerated records, retain until the conclusion of the school year and then transfer to the student's cumulative file.	1	A
H. Standardized Assessment Results	Principals &Dir. Curr. & Inst.	Curr.	Public	Group results of state, federal, and academic progress monitoring through standardized testing, as tabulated and reported by class, grade, or school.	Retain 15 years	2	A
I. Student Handbooks	Dir. Curr. & Inst.	Curr.	Public	Student Handbooks and Athletic/Co-Curricular Handbooks	Retain 21 years	1	A

20. Curriculum Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
J. Textbook Adoption Records	Dir. Curr. & Inst.	Curr.	Public	Records related to the adoption and approval of textbooks	Retain 5 years	1	A
K. Textbook Order Records and Inventories	Dir. Curr. & Inst.	Curr.	Public	Order records and inventories of classroom issued textbooks	Retain 5 years	1	A

21. FINANCE RECORDS

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Accounts Payable Records	Dir. Bus. Serv.	Finance	Public	Invoices, purchase orders, credit documents, freight bills/claims, acknowledgements/order s/shipping notices, purchasing contracts, travel expense documents, IRS 1099 forms, statements of services rendered	Retain 6 years or until the next state audit is completed	1	A, C
B. Accounts Receivable Records	Dir. Bus. Serv.	Finance	Public	Records documenting monies owed and paid to the District, (tax revenue, state/federal funds and all other sources	Retain 6 years or until the next state audit is completed	1	A, C
C. Annual Financial Report	Dir. Bus. Serv./Board Secretary	Finance & Supt.	Public	Annual school district financial report	Retain Permanently	3	A, C

21. Finance Records (continued)

Category	Person Responsible	Office Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
D. Audit Reports	Dir. Bus. Serv./Board Secretary	Finance & Supt.	Public	Any internal or external audit report	Retain Permanently	3	A, C
E. Bank Statements	Dir. Bus. Serv./Fiscal Accountant	Finance	Exempt	Bank register of transactions, credits, debits, and checks, reconciliation statements	Retain 6 years or until the next state audit is completed	2	A, C
F. Bond Records	Dir. Bus. Serv./Fiscal Accountant	Finance & Supt.	Public	Any documentation related to the issuance of bonds including bond ledgers and registers, official statements and publications, and authorizing documentation	Retain Permanently	3	A
G. Budget Records	Dir. Bus. Serv.	Finance	Public	Final budget approved by School Board	Retain Permanently	3	A, C
H. Budget Preparation Records	Dir. Bus. Serv.	Finance	Exempt	Records created and used during School District budget development including cost statements, estimates, justifications, spread sheets, and other background materials	Retain 6 years	2	A, C
I. Contracts for Services	Board Secretary	Supt.	Public	Any contract for services to which the District is a party	Retain 6 years after the expiration or termination of the contract	1	A, C
J. Deeds, Title Papers, Mortgage Notes	Dir. Bus. Serv./Board Secretary/Dir. Bldgs & Gnds	Finance, Supt., B & G	Public	Deeds, Mortgages, Easements/Rights-of-Way, License Agreements, and other documents relevant to title to School District owned property that are recorded at the Courthouse	<b>See Building Records</b>	3	A

21. Finance Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
K. Employment Contracts	Board Secretary	Supt.	Public	Employment Contracts for employees of the School District	Retain 6 years after expiration or termination of the contract	1	A
L. Federal/State Funding Documents	Dir. Pupil Serv./Dir. Curr. & Inst.	Finance	Public	Title, IDEA, etc.	Retain 6 years or until audit period has passed	1	A
M. Grant Documents	Supv. Grant Development	Grants	Public	Grant applications, awards, budgets, expenditures, reimbursements, audits, and related papers	Retain 6 years from the closing of the grant, or retain the period of time required by the grant source (whichever is longer)	1	A, C
N. Insurance Policies & Claims	Dir. Bus. Serv.	Finance	Public & Exempt	Health, dental, property, life, liability, etc. policies, waivers, amendments, and claims filed	Retain policies 6 years beyond expiration of policy term; retain claims 6 years after final disposition of the claim	2	A
O. Insurance Documents	Dir. Bus. Serv.	Finance	Public	Insurance quotes or bids (accepted and rejected), research, correspondence to/from insurer	Retain 6 years	1	A, C
P. IRS W-9 Forms	Payroll Supv.	Payroll	Exempt		Retain 6 years after final 1099 is issued	2	A
Q. Lease Agreements	Board Secretary	Supt.	Public	Real Estate, vehicles, etc.	Retain 5 years after expiration of the Agreement	1	A



21. Finance Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
R. Property Appraisals	Dir. Bldgs & Grnds	B & G	Public		Retain until superseded	2	A
S. Quotes	Dir. Bus. Serv.	Finance	Public	Successful and Unsuccessful	Retain 3 years Ref: 24 Pa. C.S. § 8-807.1	1	A
T. Sealed Bids	Dir. Bldgs & Grnds/Dir. Bus. Serv.	Finance	Public	Successful and Unsuccessful	Retain 6 years	1	A
U. Student Activity Accounts	Information Specialist Bus.Serv	Finance	Public	Bank statements, registers, cash receipts, cancelled checks and ledgers	Retain 6 years or until after the state audit	1	A

22. FOOD SERVICE RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Audit Reports	Dir. Bus. Serv.	Finance	Public		<i>See Finance Records</i>	3	A
B. Bids Received for Food and Supplies	Dir. Bus. Serv.	Finance	Public	Successful and unsuccessful bids received for food and supplies	Retain 6 years, or until audited whichever is longer	1	A
C. Contracts / Written Agreements with Service Providers	Dir. Bus. Serv.	Finance	Public	Contracts and written agreements with food service vendors and suppliers	Retain 5 years after expiration of the Agreement, or until audited whichever is longer	1	A
D. Daily Meal Count Records	Dir. Bus. Serv.	Finance	Public		Retain 4 years, or until audited, whichever is longer	1	A
E. Food Service Financial Records	Dir. Bus. Serv.	Finance	Public	Food service related purchase orders, invoices, state and federal income, records of payments made,	Retain 4 years, or until audited, whichever is longer	1	A

22. Food Service (continued)

				registers, operating reports, and any other related financial records.			
F. Free / Reduced Price Meal Applications	Dir. Bus. Serv.	Finance	Exempt	All applications (whether approved or denied), verification records, notices to families regarding acceptance/denial, lists of eligible students	Retain 4 years, or until audited, whichever is longer	2	A
G. Inventory Records	Dir. Bus. Serv.	Finance	Public	Weekly, monthly, and yearly inventory records	Retain 4 years, or until audited, whichever is longer	1	A
H. Menus / Food Production Records	Dir. Bus. Serv.	Finance	Public	Menus and other records documenting daily food production	Retain 4 years, or until audited, whichever is longer	1	A

23. HEALTH & SAFETY RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Employee Accident Reports	HR Supervisor	HR	Exempt	Any report regarding an employee accident	Retain 6 years	2	A
B. Reports of Suspected Child Abuse	Principal		Confidential	Written copy of any report of suspected abuse submitted pursuant to the PA mandatory reporting law	Retain until the conclusion of the school year in which the Student turns 50 years old	2	A
C. Security Tapes and Images	Quality Assurance Supervisor	B & G	Exempt	Any digital or video recording from school security cameras	Do not retain unless moved to a student records maintenance site. In such a	2 & 4	D

23. Health & Safety records (continued)

					case, retain until final disposition of any matter related to the recording or 3 years, whichever is longer		
D. Student Health, Immunization, and School Nurse Records	Nurses	School Nurse	Exempt	Records of immunizations, allergies, documentation of care provided by school nurse, results of vision and hearing screenings, anecdotal notes	<i>See Student Records</i>	2	A,C

24. PAYROLL RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Garnishment Records	Payroll Supervisor	Payroll	Exempt	Notices and records related to garnishments of wages	Retain 5 years after expiration of the garnishment	2	A
B. Payroll Adjustment Records	Payroll Supervisor	Payroll	Exempt	Records with amounts withheld or paid for Federal and State taxes, insurances, retirement, and any other deductions or payments	Retain 5 years	2	A
C. Payroll Register	Payroll Supervisor	Payroll	Exempt	Includes name, address, DOB, occupation, rate of pay, salary history, compensation earned each week for the duration of District employment	Retain 3 years after final payment of benefits Ref: 29 C.F.R. § 1627.3(a)	2	A
D. Requests for Duplicate Checks	Payroll Supervisor	Payroll	Exempt	Requests for replacement for lost or missing checks	Retain 5 years	2	A
E. Time Sheets	Payroll Supervisor	Payroll	Exempt	Records of dates and hours worked for hourly employees	Retain 5 years	2	A

24. Payroll Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
F. Withholding and Deduction Records	Payroll Supervisor	Payroll	Exempt	Employee requests for withholding, exemptions claimed (W-4 Form), union dues authorization, and any other records authorizing deductions	Retain until 5 years after termination or retirement	2	A
G. W-2 Statements (employer copy)	Payroll Supervisor	Payroll	Exempt		Retain 5 years after termination or retirement	2	A

25. PERSONNEL RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Applications for Employment (NOT HIRED)	HR Supervisor	HR	Exempt	Includes job applications, resumes, interview documents, cover letters, other pre-employment records, and rejection letters  <i>(Keep through school year submitted + one year.)</i>	Retain 3 years or until final disposition of a discrimination charge, whichever is later  Ref: 29 C.F.R. § 1602.14(a) 29 C.F.R. § 1602.40 29 C.F.R. § 1627.3(b)(1)	2	A
B. Arbitration Decisions and Mediation Records	HR Supervisor	HR Supt.	Exempt		Retain Permanently	3	A
C. Discrimination Complaints	HR Supervisor	HR	Exempt	Any complaints regarding discrimination or sexual harassment	Retain 10 years from the final disposition of the charge or action	2	A

25. Personnel Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
D. Employee Medical Records	HR Supervisor (Keeping for 20 years with other personnel records)	HR	Exempt	Includes medical and employment questionnaires or histories, medical exams, medical opinions, history of treatments, medications, medical complaints, requests for accommodations, documentation of exposure to toxins	Retain 30 years after termination or retirement Ref: 29 C.F.R. § 1910.1020	2	A
E. Equal Employment Opportunity Reports	HR Supervisor	HR	Public		Retain 3 years Ref: 29 C.F.R. § 1602.39	2	A
F. Immigration Records	HR Supervisor	HR	Exempt	Includes INS Form I-9: Employment Eligibility Verification Forms  <i>(Keeping for 20 years after retirement or resignation)</i>	Retain 3 years after the date of hire or one year after termination or retirement, whichever is later Ref: 8 C.F.R. § 274a.2	2	A
G. Labor Contracts & Negotiation Records	Board Secretary	HR & Supt.	Public & Exempt	Contracts between School District Management and Various Bargaining Units including correspondence, salary schedules, personnel policies	Retain permanently	3	A
H. Individual Employee Personnel Records	HR Supervisor	HR	Exempt	Includes Job application, references, resume, health and life insurance records, background checks, performance evaluation, commendations, training records, credentials,	Retain 7 years after retirement or resignation.  Retain 3 years after employment ends or until final disposition of a discrimination charge,	2	A

25. Personnel Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
				contracts, letters of resignation, reprimands, vacation and sick leave, salary, separation records, etc.	whichever is later. Ref: 29 C.F.R. 1602.14(a); 29 C.F.R. 1602.40; 29 C.F.R. 1627.3(b)(1)		
I. Job Announcements and Advertisements, Job Descriptions	HR Supervisor	HR	Public	Narrative of job duties and responsibilities, advertisements and announcements	Retain 3 years for advertisements and announcements. descriptions, retain current document plus one prior revision	1	A
J. Professional Development and Employee Training Records	HR Supervisor	HR	Public	Attendance records, agendas and instructional materials, certifications upon completion, etc.	Retain 7 years	1	A
K. Requests for Leave	HR Supervisor	HR	Exempt	Requests for Leave (Vacation, Sick, Family/Medical, etc.)	Retain for duration of Employment + 3 years after employment ends  Retain 3 years or until final disposition of a discrimination charge, whichever is later	2	A
L. Seniority Lists and Merit Pay System Records	HR Supervisor	HR	Public		Retain 2 years beyond when the seniority list or merit pay system is no longer in effect  Ref: 29 C.F.R. § 1627.3	2	A
M. Union Grievances	HR Supervisor	HR	Exempt	Employee reports or allegations of contract violations	Retain Permanently	3	A
N. Worker's Compensation Claims	HR Supervisor	HR	Exempt	Injury reports, records, and correspondence about injuries sustained	Retain 30 years after termination or retirement.  Ref: 29 C.F.R. § 1910.1020	2	A

26. STUDENT RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Academic Grades	Principals	Category A File School Guidance	Exempt		<u>Retain 100 years after the students' 21<sup>st</sup> birthday</u>	3	A,C
B. Graduation Records/Transcripts/ Grade Level Completed/Awards & Degrees	Principals	Category A File School Guidance	Exempt		<u>Retain 100 years after the students' 21<sup>st</sup> birthday</u>	3	A,C
C. Attendance Records	Principals	Category A File Principals and School Guidance	Exempt	Summary of yearly attendance by student recorded in cumulative file	Retain until the conclusion of the school year then transfer data to cumulative file and it becomes part of the permanent file. <u>Retain 100 years after the students' 21<sup>st</sup> birthday</u>	2	A,C
D. Personal Student Data	Principals	Category A File School Guidance	Exempt	Student Name, Address, Telephone Listing, and electronic mail address Date & Place of Birth Photographs	<u>Retain 100 years after the students' 21<sup>st</sup> birthday</u>	2	A
E. Extra-Curricular and Co-Curricular Participation Records	Principals	Category A File School Guidance (Principal's Office)	Public	Participation, contracts, team results, group photographs and/or videos	Retain until the conclusion of the school year and then transfer to student's cumulative file and <u>retain 100 years after the students' 21<sup>st</sup> birthday</u>	1	A

26. Student Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
F. Student Discipline Records	Principals	Category B File (B-D) Discipline Records	Exempt	Suspension, Expulsion	Retain 6 years after the student ceases to be enrolled in the District.	2	A,C
G. Accident Reports (student)	Principal	Category B File (B-H)	Exempt	Accident Report	Retain 6 years after the student ceases to be enrolled in the District.	2	A
H. Health, Immunization, and School Nurse Records	School Nurse	Category B File (B-H) School Nurse	Exempt	Records of immunizations, allergies, documentation of care provided by school nurse, results of vision and hearing screenings, anecdotal notes	Retain 6 years after the student ceases to be enrolled in the District.	2	A,C
I. Chapter 15 Service Agreements	Principals	Category B File Guidance Office	Exempt	§504 Service Agreements	Retain 6 years after the student ceases to be enrolled in the District or until the student reaches the age of 24, whichever is later.	2	A
J. Court Documents - Custody & Protection from Abuse	Principals	Category B File Guidance Office	Exempt		Retain 6 years after the student ceases to be enrolled in the District.	2	A
K. Family Background Information	Principals	Category B File Guidance	Exempt		Retain 6 years after the student ceases to be enrolled in the District.	2	A



26. Student Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
L. Special Education Records	Dir. Pupil Serv.	Category B File (B-PS) Pupil Services	Exempt	IEPs and GIEPs, evaluation reports, progress monitoring, communication logs, NOREPs and NORAs	Retain 6 years after the student ceases to be enrolled in the District or until the student reaches the age of 24, whichever is later.	2	A
M. Interests Inventory Results	Principal	Category B File Guidance	Exempt		Unnecessary documents should be eliminated at points of transition: elementary to middle and middle to high school.	2	A
N. Instructional Support Team (IST) Information	Principal	Category B File Guidance			Unnecessary documents should be eliminated at points of transition: elementary to middle and middle to high school.	2	A
O. Student Performance Records	Principals	Category B File Guidance	Exempt	Individual standardized test scores, curriculum-based assessment scores, yearly report cards, standardized intelligence & aptitude tests	Retain until the conclusion of the school year then transfer data to cumulative file and retain 6 years after the student ceases to be enrolled in the District.	2	A
P. Teacher or counselor ratings	Principals	Category B File	Exempt	Systematically gathered teacher or counselor ratings & observations; verified reports	Retain 6 years after the student ceases to	2	A

26. Student Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
Q. Counseling Records	Principals	Category C File Guidance Office	Exempt	Guidance Records, School social worker records, and other documentation of individual or group counseling	Retain 6 years after the student ceases to be enrolled in the District or until the student reaches the age of 21, whichever is later.	2	A
R. Legal or Clinical Findings	Principals	Category C File Guidance Office	Exempt	Legal or clinical findings including personality tests	If verified or found to be clearly needed beyond the present, Transfer to Category B only if, 1) continuing usefulness of information is clearly demonstrated and 2) validity is verified & parents are notified and information explained.	2	A
S. Student Assistance Program (SAP)	Principals	Category C File Guidance Office	Exempt		If verified or found to be clearly needed beyond the present, Transfer to Category B only if, 1) continuing usefulness of information is clearly demonstrated and 2) validity is verified &	2	A

26. Student Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
T. Threat Assessments	Principals	Category C File Guidance Office	Exempt		parents are notified and information explained.  If verified or found to be clearly needed beyond the present, Transfer to Category B only if, 1) continuing usefulness of information is clearly demonstrated and 2) validity is verified & parents are notified and information explained.	2	A
U. Unevaluated Teacher, counselor, and other reports needed for ongoing Investigations	Principals	Category C File Guidance Office	Exempt	Unevaluated reports for investigations of disciplinary or counseling actions	If verified or found to be clearly needed beyond the present, Transfer to Category B only if, 1) continuing usefulness of information is clearly demonstrated and 2) validity is verified & parents are notified and information explained.	2	A
V. Electronic Mail	Technology Supervisor	Tech	Exempt	Any e-mail containing the name or other personally identifiable information of a student including e-mails to/from a student	Not retained unless moved to a student records maintenance site, in which case retain for 6 years after the student ceases to	4	A,C

26. Student Records (continued)

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
W. Home & School Visitor Records	Dir. Pupil Serv.	Pupil Services	Exempt	Any records related to referrals and home visits by the District home and school visitor	Retain 6 years after the student ceases to be enrolled in the District.	2	A,C
X Homeschool Records	Dir. Pupil Serv.	Pupil Services	Exempt	Any records related to a student being homeschooled including affidavits and portfolios	Retain 6 years after the student ceases to be enrolled in homeschooling in the District.	2	A
Y. Working Papers	Principals	School Guidance	Exempt		Retain 5 years	2	A
Z. Honor Roll Lists	Principals	School Guidance	Public		Retain permanently	3	A
AA. Attendance Excuse Records	Principals	Principal's Office	Exempt	Written excuses for non-attendance and/or tardiness	Where excuse is accepted: retain written excuse for 1-year after the absence is recorded as "excused" in attendance software.  Where excuse is rejected: retain 6 years after the student ceases to be enrolled in the District.	2	A

27. TRANSPORTATION RECORDS

Category	Person Responsible	Location	Record Classification	Description	Retention Period	Disposal Code	Media Code
A. Accident & Incident Reports	Transportation Manger		Exempt	Any reports or other documentation related to accidents involving or incidents occurring on District or contractor provided transportation	Retain 5 years	2	A
B. Contracts with Independent Contractors for Transportation Related Services	Transportation Manger		Public		Retain 5 years after expiration of the contract	1	A
C. Correspondence and Reports from Independent Contractors	Transportation Manger		Public	Any correspondence with, or records or reports provided by, independent contractors	Retain 5 years	1	A
D. Driver Eligibility Records	Transportation Manger		Exempt	Records related to driver training, medical eligibility, and licensing	Retain 5 years after retirement or termination	2	A
E. Maintenance Records	Transportation Manger		Public	Equip. Maintenance Records	Life of Equipment	1	A
F. Insurance Records	Transportation Manger		Exempt		<i>See Financial Records</i>	2	A
G. Transportation Reimbursement Records	Transportation Manger		Public	Any records related to state reimbursement of transportation expenses	Retain 3 years or until the school year has been audited.  Ref: 22 Pa. Code §§ 23.31-23.40	2	A

WARREN COUNTY SCHOOL DISTRICT  
RECORDS DISPOSAL REQUEST FORM

Person Making Disposal Request:	Building:
Department:	Location of Records:
Email Address:	Date of Request
Description of Record(s):	
Inclusive Dates of Records	Medium in Which Records Exist:
Page, Section, and Item Numbers	Retention Period in Plan
Quantity of Records:	

FOR USE BY RECORD RETENTION OFFICE

Request for Disposal:

Approved

Denied

Reason Request Denied:

\_\_\_\_\_  
Records Retention Officer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date Request Reviewed

***IF APPROVED, THE RECORDS IN QUESTION MAY BE DESTROYED***

## Record Destruction Log

Record Title	Authorization for Disposal (Page, Section, and Item Numbers)	Inclusive Dates Of Records	Format of Records	Date Disposal Authorized by Records Retention Officer

**FOR USE BY THE DISTRICT RECORD RETENTION OFFICER**

I, \_\_\_\_\_ hereby approve of the disposal of the records listed above as requested.  
Record Retention Officer's Name

\_\_\_\_\_  
Record Retention Officer's Signature

\_\_\_\_\_  
Date