

**3200 Responsibilities of Administrators**  
**3221 Records Management Policy**I. Purpose

The Board wishes to ensure that all District records (as the term "records" is defined below) are managed and retained in accordance with state and federal law and regulations; to define District staff responsibilities with regard to the management and retention of records; and to ensure that the District's Records Management Plan is consistent with all other District Policies pertaining to records, including but not limited to, Policies 2345, 3220, 7601, 7610, 10910, and 10920.

II. Definitions

**Electronic Mail (E-mail) System** - a system that enables users to compose, transmit, receive and manage text and/or graphic electronic messages and images across local area networks and through gateways connecting other networks. This information consists primarily of messages but may include attachments such as calendars, directories, distribution lists, word processing documents, spreadsheets, and other electronic documents.

**Litigation Hold** - a communication ordering that all records and data relating to an issue being addressed by current or potential litigation or investigation be preserved for possible production during the litigation or investigation.

**Records** - information, regardless of physical form or characteristics, that documents a transaction or activity of the District and that is created, received or retained pursuant to law or in connection with a transaction, business or activity of the District. The term includes a document, paper, letter, map, book, tape, photograph, film or sound recording, information stored or maintained electronically and a dataprocessed or image-processed document.

**Records Management Plan** - the system implemented by the District for the retention, retrieval, and disposition of all records generated by District operations.

**Records Retention Schedule** - a comprehensive listing stating retention periods and proper disposition of records.

### III. Delegation of Responsibility

#### Records Coordinator

In order to maintain a Records Management Plan that complies with federal and state laws and regulations and Board Policy, the Board designates the Director of Instructional Technology/Communications as the District's Records Coordinator who shall serve as the chairperson of the Records Management Committee.

#### Records Management Committee

A committee responsible for the development and recommendation of the District's Records Management Plan shall be established by the Board. The Records Management Committee shall give primary consideration to the most efficient and economical means of implementing the recommended Plan. Members of the Committee shall include the:

1. Superintendent.
2. One Board Member to be appointed by the Board President.
3. Director of Instructional Technology/Communications.
4. Business Manager
5. Board Secretary/Open Records Officer.

The Records Management Committee shall create the original Records Management Plan to be approved by the Board, meet annually to evaluate the effectiveness and implementation of the Records Management Plan, consult with the District's Solicitor as needed, and recommend changes to the Board as needed.

### IV. Guidelines

#### Records Management Plan

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 Records Management Plan shall include:

1. Comprehensive listing of records and data of the District.
2. Criteria to distinguish records of the school District from the supplemental personal records of individual employees.
3. System(s) of records storage and retrieval to be used, including in what form the records will be stored, maintained, reproduced, and disposed.

4. Preservation measures to protect the integrity of records and data.
5. Data map or flow chart detailing the sources, routes, and destinations of electronic records.
6. Procedures for adding, revising or deleting records and data, and any other details necessary to implement the Records Management Plan.
7. Records Retention Schedule.
8. Provisions for the storage and retrieval of records in the event of an emergency or disaster.
9. Staff positions authorized to access District records.
10. Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all records relevant to the current or potential claim. Such procedures shall specify:
  - a. Who can initiate a litigation hold.
  - b. How and to whom a litigation hold is communicated.
  - c. Who will determine which records are subject to the litigation hold.
  - d. Who will be responsible for collecting and preserving such records and data.
  - e. Who will be responsible for monitoring and ensuring the District's compliance with the litigation hold.
  - f. In what format the records will be collected.

#### Manual Records

Manual records, which include all records not stored electronically, shall be retained and disposed of in accordance with the Records Management Plan. Manual records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

The District shall develop and maintain adequate and up-to-date documentation about each manual record system. Documentation may:

1. List system title and responsible employee(s) or office.
2. Define the contents of the system, including record formats.

3. Identify vital records and information.
4. Determine restrictions on access and use.

#### Electronic Records

Electronic records shall be retained and disposed of in the same manner as records in other formats and in accordance with the Records Management Plan. Electronic records shall be indexed in an organized and consistent manner, reflecting the way the records will be retained and referenced for later retrieval.

The District shall develop and maintain adequate and up-to-date documentation about each electronic record system. Documentation may:

1. List system title and responsible employee(s) or office.
2. Specify all technical characteristics necessary for reading or processing the records stored on the system.
3. Identify all defined inputs and outputs of the system.
4. Define the contents of the system, including records formats and database tables.
5. Identify vital records and information.
6. Determine restrictions on access and use.
7. Describe update cycles or conditions.

#### E-mail Records

E-mail records, including messages and attachments, shall be retained and disposed of in accordance with the District's Records Management Plan. E-mail records may be maintained as an electronic record or be printed and maintained as a manual record.

For each e-mail considered to be a record, the following information shall be retained:

1. Message content.
2. Name of sender.
3. Name of recipient.
4. Date and time of transmission and/or receipt.

Adoption Date -

Revised -

Practice -

Legal References - 24 P.S. §433; 24 P.S. §518; 65 P.S. Sec. 67.101 et seq.;  
20 U.S.C. Sec. 1232g; Federal Rules of Civil Procedure 16, 26,  
34, 37, and 45

Cross Reference -