

SECTION: OPERATIONS

TITLE: RECORD RETENTION  
SCHEDULE

ADOPTED: 03/23/92

REVISED: 01/02/13, 02/06/13, 02/23/17

REVIEWED:

# SOUTHERN LEHIGH SCHOOL DISTRICT

Formerly policy  
2201AR

## 801.1 AR. RECORD RETENTION SCHEDULE

### 1. Purpose

This Records Retention and Disposition Schedule provides guidelines to implement School Board Policies \_\_\_\_\_ Records Retention and \_\_\_\_\_ Education Records. 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 schedule provides an orderly and systematic records retention system – providing a basis for an organized and functional use of District records.

### 2. Schedule Must Be Followed

This Records Retention and Disposition Schedule can only function effectively to conserve District resources and costs if followed by all of the District’s employees. This schedule establishes the **minimum length of time** for retention of the records identified below. No records shall be intentionally destroyed in contravention of this schedule except as enumerated below.

### 3. Record Coordinator

The Superintendent shall identify a “Record Coordinator” as central point of contact for the District who will coordinate the retention and disposition of records in accordance with this schedule. No records identified herein may be destroyed without approval of the Record Coordinator. The Record Coordinator shall maintain a log of all records destroyed pursuant to this schedule.

### 4. Record Disposal Procedure

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

- a) A request to dispose of a non-permanent record shall be submitted to

the Record Coordinator 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 Coordinator shall review the destruction request and shall grant the disposal request upon verification that the applicable retention period identified herein has been met.
- c) Upon review, the Record Coordinator 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 Coordinator shall record the disposal of the records in the records disposal log that he or she maintains. (Attached as Appendix B)

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

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

#### **6. Duplicate Records**

This schedule 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.

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

This schedule provides for the systematic retention of e-mail for a limited period of time. However, in many cases, other records identified in this schedule with longer retention periods may be received via e-mail (e.g. accident report received via e-mail; employee requests for leave; 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 schedule, even if that requires saving the record in a format other than via e-mail.

#### **8. Litigation Hold Procedures**

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

Any District administrator, upon being notified of pending 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 ensure that 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.

### **9. Records NOT In This Schedule**

Records not identified in this schedule may be disposed of without written approval by the Records Retention Officer **unless** the employee has been notified that the record is subject to a litigation hold or has been notified that 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 Coordinator

### **10. Exceptions**

Requests for exceptions to this schedule should be submitted in writing to the Record Coordinator. Upon review of the request, and only with approval of the Superintendent, the Record Coordinator *may* grant an exception to this schedule so long as the exception does not substantially impede the overall purpose of this schedule as stated above.

### **11. Interpretation**

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

### **12. Review**

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

### **13. 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.

#### 14. Policy Availability

All employees shall be provided with a copy of this Records Retention and Disposition Schedule along with School Board Policy \_\_\_\_\_ Records Retention and School Board Policy \_\_\_\_\_ Education Records. The policies and the Record Retention and Disposition Schedule shall also be posted on the District's website.

#### 15. Special Rules For Interpreting These Guidelines

These procedures are intended to establish internal expectations of the District for its staff in the implementation of District Policy \_\_\_\_\_ Education Records and District Policy \_\_\_\_\_ Records Retention. 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 that any provision of these guidelines is determined to violate any law, that provision only shall be deemed void, and the remainder of these procedures shall remain in effect.

This version of our model record retention policy is highlighted as a reference for administrators to delineate mandatory versus discretionary time periods.

We have separated the time periods into three categories:

**BLUE** = Discretionary – our recommendation on how long to retain these records that do not have a specific retention period by law.

**PINK** = Mandatory by Law – these time periods are included as written in the law, without variation.

**GREEN** = Mandatory by Law – these time periods are the mandatory time periods required by law, but adapted with our recommendation to ensure legal compliance. In most cases, we've extended the time period to ensure that records are maintained for the full time period required.

## ADMINISTRATION RECORDS

Category	Description	Retention Period
Boundary Changes – District Map	Maps and any description of changes to District boundaries	Permanent
Building sign in / sign out documentation	Documents signed by students, parents, and other school visitors showing arrival and departure	Retain until the conclusion of the school year
Calendar (as adopted by School Board)	Official calendar reflecting number of days and length of school day, as well as scheduled District activities	Permanent
Census Records	Official census records conducted once per decade	Permanent
Election Records	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
Correspondence / E-mail	All formal and informal correspondence ( <b>including e-mails</b> ) to or from school district employees	Retain 3 years
Litigation Records	Any records related to litigation filed against the District, its employees, or contracted parties, or anticipated litigation for which the District has been provided written notice.	Retain 3 years from the final disposition of litigation
Memoranda of Understanding	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
Minutes	Minutes of School Board and designated committee meetings	Permanent
Policies	Official School Board policies	Retain until 5 years after policy is changed or repealed
Publications	Official District publications including District and Student generated newsletters, newspapers, and yearbook	Permanent
Publications	Official District publications including District and Student generated newsletters, newspapers, and yearbook	Permanent
Recordings of Board Meetings	Digital and/or taped recordings of School Board and designated committee meetings	Retain only until board minutes are officially approved.
Reports to State Department of Education	Annual or other official reports generated by the District and submitted to PDE	Permanent
Security Recordings		See Health and Safety Records

## BUILDING RECORDS

Category	Description	Retention Period
Accident/Damage Reports	Reports of damage to, or accidents with school property	Retain 10 years
Building Maintenance Records		Retain until obsolete
Building and Construction	Plans, inspection reports, and	Retain 10 years

Permits	applications	
Building and Grounds Records	Blueprints, specifications, abstracts, deeds, title papers, final inspection reports, and occupancy permits	Permanent
Building Equipment and Other Fixed Asset Records	Equipment, appliances, fixtures, materials, inventories, manuals, depreciation schedules	Life of the item

## CURRICULUM RECORDS

Category	Description	Retention Period
Class Schedules	Schedule of classes for each school building	Retain 4 years Ref: 2 C.F.R. §200.333
Class Weight Schedules	Schedules explaining any weight given to AP or Honors classes in calculating grade point averages	Retain 21 years
Course Lists	List of middle school and high school courses with program descriptions	Retain 4 years Ref: 2 C.F.R. §200.333
Course records	Syllabi, course outlines and summaries, reading lists, handout materials	Retain 4 years Ref: 2 C.F.R. §200.333
Curriculum development records	Program information, recommendations, program details, procedures, research basis for programming	Retain 5 years
Graduation Requirements	List of Courses required for graduation	Retain 21 years
International Baccalaureate Documentation	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.
Standardized Assessment Results	Group results of state, federal, and academic progress monitoring through standardized testing, as tabulated and reported by class, grade, or school. [See Student Records for individual student test results]	Retain 10 years
Student Handbooks		Retain 21 years
Textbook Adoption Records	Records related to the adoption and approval of textbooks	Retain 5 years
Textbook Order Records and Inventories	Order records and inventories of classroom issued textbooks	Retain 5 years

## FINANCE RECORDS

Category	Description	Retention Period
Accounts Payable Records	Invoices, purchase orders, credit documents, freight bills/claims, acknowledgements/orders/shipping notices, purchasing contracts, travel expense documents, IRS 1099 forms, statements of services rendered	Retain 6 years

Accounts Receivable Records	Records and ledgers documenting monies owed and paid to the District, include tax revenue records, state and federal funds received, and others amounts received with the amounts and source	Retain 6 years
Annual Financial Report	Annual school district financial report	Retain Permanently
Audit Reports	Any internal or external audit report	Retain Permanently
Bank Statements	Bank register of transactions, credits, debits, and checks, reconciliation statements	Retain 6 years
Bond Records	Any documentation related to the issuance of bonds including bond ledgers and registers, official statements and publications, and authorizing documentation	Retain 6 years after the debt is retired and final audit completed
Budget Records	Final budget approved by School Board	Retain Permanently
Budget Preparation Records	Records created and used during school district budget development including cost statements, estimates, justifications, spread sheets, and other background materials	Retain 6 years
Contracts for Services	Any contract in which the District is a party	Retain 6 years after the expiration or termination of the contract
Deeds, Title Papers, Mortgage Notes		See Building Records
Employment Contracts		Retain 6 years after expiration or termination of the contract
Grant Documents	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)
Insurance Policies & Claims	Health, dental, property, life, liability, etc. policies, waivers, amendments, and claims filed.	Retain 6 years beyond expiration of policy term
Insurance Documents	Insurance quotes or bids (accepted and rejected), research, correspondence to/from insurer	Retain 6 years
IRS W-9 Forms		Retain 6 years after final 1099 is issued
Lease Agreements		Retain 3 years after expiration
Property Appraisals		Retain until superceded
Quotes	Successful and Unsuccessful	Retain 3 years Ref: 24 Pa. C.S. § 8-807.1
Sealed Bids	Successful and Unsuccessful	Retain 6 years
Student Activity Accounts	Bank statements, registers, cash receipts, cancelled checks and ledgers	Retain 6 years

### FOOD SERVICE RECORDS

Category	Description	Retention Period
Audit Reports		See Finance Records

Bids Received for Food and Supplies	Successful and unsuccessful bids received for food and supplies	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Contracts / Written Agreements with Service Providers	Contracts and written agreements with food service vendors and suppliers	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Daily Meal Count Records		Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Food Service Financial Records	Food service related purchase orders, invoices, state and federal income, records of payments made, registers, operating reports, and any other related financial records	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Free / Reduced Price Meal Applications	All applications (whether approved or denied), verification records, notices to families regarding acceptance/denial, lists of eligible students	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Inventory Records	Weekly, monthly, and yearly inventory records	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15
Menus / Food Production Records	Menus and other records documenting daily food production	Retain 4 years, or until the completion of any active audit, whichever is longer. Ref: 7 C.F.R. §210.15

### HEALTH & SAFETY RECORDS

Category	Description	Retention Period
Employee Accident Reports	Any report regarding an employee accident	Retain 6 years
Reports of Suspected Child Abuse	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
Security Tapes and Images	Any digital or video recording from school security cameras	Do not retain unless moved to a student records maintenance site. In such a case, retain until final disposition of any matter related to the recording or 3 years, whichever is longer
Student Health, Immunization, and School Nurse Records	Records of immunizations, allergies, documentation of care provided by school nurse, results of vision and hearing screenings, anecdotal notes	See Student Records

### PAYROLL RECORDS

Category	Description	Retention Period
Garnishment Records	Notices and records related to garnishments of wages	Retain 3 years after expiration of the garnishment
Payroll Adjustment Records	Records with amounts withheld or paid for Federal and State taxes, insurances, retirement, and any other deductions or payments	Retain 3 years
Payroll Register	Includes name, address, DOB,	Retain 3 years after final payment of benefits



	occupation, rate of pay, salary history, compensation earned each week for the duration of District employment	Ref: 29 C.F.R. § 1627.3(a)
Requests for Duplicate Checks	Requests for replacement for lost or missing checks	Retain 3 years
Time Sheets	Records of dates and hours worked for hourly employees	Retain 3 years
Withholding and Deduction Records	Employee requests for withholding, exemptions claimed (W-4 Form), union dues authorization, and any other records authorizing deductions	Retain until 3 years after termination or retirement
W-2 Statements (employer copy)		Retain 3 years after termination or retirement

## PERSONNEL RECORDS

Category	Description	Retention Period
Applications for Employment (NOT HIRED)	Includes job applications, resumes, interview documents, cover letters, other pre-employment records, and rejection letters	Retain 3 years or until final disposition of a discrimination charge, whichever is later  Ref: 29 C.F.R. § 1602.14 29 C.F.R. § 1602.40 29 C.F.R. § 1627.3(b)(1)
Arbitration Decisions and Mediation Records		Permanent
Background Checks (Employees and Volunteers)	Includes criminal background checks, sexual abuse/misconduct disclosure forms	Retain for 50 years after termination or retirement
Child Abuse Training Verification	Documentation that employee or volunteer has received mandatory child abuse training.	Retain documentation of most recent training until superseded, or 5 years after individual is no longer working with the District.
Discrimination Complaints	Any complaints regarding discrimination or sexual harassment	Retain until final disposition of the charge or action
Employee Medical Records	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
Equal Employment Opportunity Reports		Retain 3 years  Ref: 29 C.F.R. § 1602.39
Immigration Records	Includes INS Form I-9: Employment Eligibility Verification Forms	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
Labor Contracts & Negotiation Records	Contracts between School District Management and Various Bargaining Units including correspondence, salary schedules,	Permanent

	personnel policies	
Individual Employee Personnel Records	Includes job application, references, resume, health and life insurance records, background checks, performance evaluations, commendations, training records, credentials, contracts, letters of resignation, reprimands, vacation and sick leave, salary, separation records, etc.	Retain 3 years after employment ends, or until final disposition of a discrimination charge, whichever is later  Ref: 29 C.F.R. 1602.14; 29 C.F.R. 1602.40; 29 C.F.R. 1627.3(b)(1)
Job Announcements and Advertisements, Job Descriptions	Narrative of job duties and responsibilities, advertisements and announcements	Retain 3 years for advertisements and announcements.  For descriptions, retain current document plus one prior revision
Professional Development and Employee Training Records	Attendance records, agendas and instructional materials, certifications upon completion, etc. <i>See p.13 for proof of Child Abuse Training.</i>	Retain 3 years
Requests for Leave	Requests for Leave (Vacation, Sick, Family/Medical, etc.)	Retain 3 years or until final disposition of a discrimination charge, whichever is later
Seniority Lists and Merit Pay System Records		Retain 2 years beyond when the seniority list or merit pay system is no longer in effect  Ref: 29 C.F.R. § 1627.3
Union Grievances	Employee reports or allegations of contract violations	Permanent
Worker's Compensation Claims	Injury reports, records, and correspondence about injuries sustained	Retain 30 years after termination or retirement.  Ref: 29 C.F.R. § 1910.1020

## STUDENT RECORDS

Category	Description	Retention Period
Accident Reports (Student)		Retain until the conclusion of the school year then transfer data to cumulative file
Attendance Records	Summary of yearly attendance by Student as recorded in cumulative file	Retain until the conclusion of the school year then transfer data to cumulative file
Attendance Excuse Records	Written excuses for non-attendance and/or tardiness	Where excuse is accepted: attendance excuse need not be retained after the absence is recorded as "excused" in attendance software  Where excuse is rejected: retain written excuse for one year (or until the conclusion of any truancy proceedings, whichever is later)
Counseling Records	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.
Cumulative Student File	Cumulative electronic and/or physical file	Retain 6 years after the student ceases to be enrolled in the District.
Electronic Mail	Any e-mail containing the name or other personally identifiable	Not retained unless moved to a student records maintenance site, in which case retain for 6 years after the

	information of a student including e-mails to/from a student	student ceases to be enrolled in the District.
Extra-Curricular and Co-Curricular Participation Records	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
Health, Immunization, and School Nurse Records	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.
Home & School Visitor Records	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.
Homeschool Records	Any records related to a student being homeschooled including affidavits and portfolios	Retain 6 years after the student ceases to be enrolled in the District.
Special Education Records	IEPs and GIEPs, evaluation reports, §504 Service Agreements, progress monitoring, communication logs, NOREPs and NORAs	Retain 6 years after the student ceases to be enrolled in the District.
Student Performance Records	Individual standardized test scores, curriculum-based assessment scores, yearly report cards	Retain until the conclusion of the school year then transfer data to cumulative file

### TRANSPORTATION RECORDS

Category	Description	Retention Period
Accident & Incident Reports	Any reports or other documentation related to accidents involving or incidents occurring on District or contractor provided transportation	Retain 3 years
Contracts with Independent Contractors for Transportation Related Services		Retain 3 years after completion of contract
Correspondence and Reports from Independent Contractors	Any correspondence with, or records or reports provided by, independent contractors	Retain 3 years
Driver Eligibility Records	Records related to driver training, medical eligibility, and licensing	Retain 3 years after retirement or termination
Maintenance Records	Equip. Maintenance Records	Life of Equipment
Insurance Records		See <i>Financial Records</i>
Transportation Reimbursement Records	Any records related to state reimbursement of transportation expenses	Retain 3 years Ref: 22 Pa. Code §§ 23.31-23.40

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 and Section in Schedule	Retention Period in Schedule
Quantity of Records	

FOR USE BY RECORD RETENTION OFFICE

Request for Disposal:

Approved

Denied

Reason Request Denied
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\_\_\_\_\_  
Record Coordinator

\_\_\_\_\_  
Signature

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

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