

ABINGTON SCHOOL DISTRICT
ABINGTON, PENNSYLVANIA

SUPERINTENDENT'S
ADMINISTRATIVE PROCEDURE

REGARDING: **Records Management –
Business Operations**

Section: **Business**

Effective Date: June 25, 2013

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9/9/20, 2/23/22,
8/25/22, 8/7/23,
1/23/24

See Also: Related Board Policy;
Board Policy and SAP Regarding
Records of Students

The 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 District has 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 to create guidelines for appropriate uses of particular means of communication. The purpose of this procedure is to clarify how records will be retained and destroyed.

Definitions

“Electronically Stored Information (ESI)” includes but is not limited to emails, and electronic documents. The possible sources/locations of ESI are individual hard drives, local and remote servers, removable media and devices used to conduct school district business.

“Records” include recorded information, regardless of form, that is created or received or retained in accordance with the District’s official business. ESI constitutes “records” when and only when the function and content of the message warrants retention under applicable law, policies or procedures.

“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.

Retention, Storage and Destruction of Records

General Guidelines for Retention of Records

The Records Retention Chart attached as Attachment A sets forth the responsible department, 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 Assistant Superintendent for review.

Special Guidelines for Purging of ESI

In general, appropriate hardware and software shall be used to ensure that ESI identified as records is reasonably accessible; however, to the extent that information is “backed up” for the sole purpose of restoring the system in the case of an emergency, such information is not considered records by the District and need not be reasonably accessible. Additionally, ESI that has been purged in accordance with the accompanying Policy and this Procedure shall also be deemed not reasonably accessible. The Chart entitled “Special Guidelines for Purging of ESI” attached as Attachment B sets forth the minimum retention period for ESI prior to purging. Such purging may be an automatic function of the record retention system.

Legal Hold Procedures

When the District believes that a matter is likely to lead to litigation by or against the 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 until such time as the legal hold is lifted.

- Responsibility

Because of the variety of matters that could lead to litigation by or against the District, the responsibility to identify such matters rests with District employees. Principals and other supervisors are responsible for informing staff whom they supervise of their responsibilities to report items covered by a legal hold.

- Procedure

When a District employee has reason to believe that an incident may give rise to potential litigation, that employee shall:

- advise immediate supervisor, building supervisor, or specific central administrator of the incident and prepare a written report stating what the individual saw and/or heard, the names of the people and entities involved and the names of any witnesses
- preserve records relating to the matter, pending a determination regarding whether a legal hold is necessary.

The administrator must forward a written report to the Superintendent or designee, who, in consultation with the Solicitor, will determine whether to place a legal hold on records, including ESI, relevant to the incident(s).

If a legal hold is implemented, the Superintendent or designee shall direct the appropriate administrator(s) to make all reasonable efforts to retrieve and maintain any archived ESI before that data is purged and to further prevent potentially relevant records from being purged or deleted.

The Superintendent or designee shall direct the appropriate administrator to advise the

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

- Release of Legal Hold

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

Destruction

Records shall be purged in accordance with the attached document retention schedule in Attachment A and B.

Responsibility

Periodically, the Director of Information Technology and the Chief Financial Officer shall perform reviews to ensure that information being retained in manual form is being retained in a reasonably accessible manner, information being retained in electronic form is being retained in a reasonably accessible manner, confidential information is being maintained in a secure manner and electronic and manual records are being retained and purged in accordance with this Superintendent's Administrative Procedure.

Attachment A

RECORD RETENTION SCHEDULE

Description	Department	Minimum Retention Period	Disposal
Accident Reports – Student injuries	Business	When student turns 20 or 15 years, whichever is shorter	2
Accident Reports – all other	Business	5 years	2
Accounts Payable/Receivable	Business	7 years	2
Annual Budget	Business	10 years	1
Annual Financial Reports	Business	Permanent	3
Annual Audit Reports	Business	Permanent	3
Bank Statements, Check Registers, Deposit Slips	Business	7 years	1
Bids – Accepted	Business	7 years after end of project	1
Bids – Rejected	Business	7 years after end of project	1
Board Minutes - Board approved	Business	Perpetual	3
Board Minutes - Notes, Recordings and/or Any Other Materials Used to Prepare Official Minutes	Business	Until official minutes are approved by Board	2
Board Policies – Current	Assistant Board Secretary	On-going	3
Board Policies – Former	Assistant Board Secretary	20 years	3
Collective Bargaining Agreements	Human Resources	Permanent	1
Construction Contracts	Business	12 years after termination	1
Dynamic Remotely Operated Navigation Equipment – Drones – Application Form – Permission to Operate Non-District-Owned or Operated Drone on or over District Property	Facilities	3 years	1
Dynamic Remotely Operated Navigation Equipment – Drones Application Form – Permission to Operate District-Owned or Operated Drone on or over District Property	Teaching and Learning	3 years	1
Emergency Preparedness Plan	Superintendent	2 years after revision	2
Ethics- Statements of Financial Interest	Superintendent	5 years	1
Employee records – criminal background, discipline, grievances, complaints, resignation/retirement	Human Resources	7 years after end of employment	2
Employee records – other – application, attendance, evaluations, leave, pre-employment references, professional development, contracts	Human Resources	7 years after end of employment	2
Employee records – medical, pre-employment medical exam	Human Resources	7 years after end of employment	2

Employee Benefits Records	Human Resources	50 years after termination of employment. If all benefits are paid prior to expiration of 50 years, retain records 3 years after all benefits have been paid.	2
Employee records – Wage and hour information including W-2s, W-4s	Business	40 years	2
Employee Records – Records	Business/Human Resources	7 years	2
Equal Employment Opportunity Reports	Human Resources	3 years	1
Facilities – Equipment Inventories	Business	7 years	1
Facilities – Permitted Use Files	Facilities	7 years	1
Facilities – Pesticide Application Record	Facilities – Each Building	7 years	1
Facilities – Bleacher and Grandstand Inspections			
Facilities –Fixed Asset List	Business	Permanent	3
Federal Grants	Business	7 years	1
Free and Reduced Lunch	Student Services	7 years	2
General Ledger	Business	Permanent	3
Insurance Claims	Business	15 years after settlement/expiration of associated claim; if claim relevant to student, then records may be destroyed if at least 2 years after student's graduation	2
Insurance Policies	Business	20 years	1
Investment Records	Business	7 years after cancellation	1
Litigation	Business	7 years after conclusion of litigation	2
Payroll Records	Business	7 years	2
Press Releases	Business	Permanent	3
Property Records – Deeds, Easements, Leases, Purchase/Sale	Business	Permanent	3
Purchase Orders	Business	7 years	1
Safe Schools Act Reports	Business	Permanent	3
Student Records	Student Services	See Board Policy and SAP Re: "Records of Students"	2
Tax Collection Records – Property	Business	6 years from date of payment	1
Tax Collection Records – Other	Business	6 years from date of payment	2
Workers' Compensation	Human Resources	10 years after employee has no open claims	2

Disposal Codes:

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

Attachment B**SPECIAL GUIDELINES FOR PURGING OF
ELECTRONICALLY STORED INFORMATION (ESI)**

Description		Department	Purging Guidelines
Non-Business District-wide ESI system (whether kept by backup tapes, discs, or other media) kept principally for purpose of disaster recovery – not readily accessible		Technology	Retained for at least 12 weeks
Business Department ESI system (whether kept by backup tapes, discs, or other media) kept principally for purpose of disaster recovery – not readily accessible		Business Office	Retained in perpetuity
Archived Email – not readily accessible		Technology	ESI more than 2 years old purged
Email – readily accessible		Technology	Emails not otherwise retained for content or litigation hold maintained; deleted after 2 years