

**WARWICK SCHOOL DISTRICT
RECORDS MANAGEMENT PLAN AND RECORDS MANAGEMENT SCHEDULE**

How to Use the Records Management Schedule

The Records Management Schedule lists records that are created, received, or retained as a result of the District's operations. These guidelines are for implementation of board policy 800, Records Management and board policy 216, Student 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. The schedule includes a description of the records, format in which the records will be retained, retention period, and disposal code. The following information will assist in applying this schedule.

This Records Management Plan and Records Management 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.

- **Delegation of Responsibility**
Each record description has a corresponding administrator responsible for these records. Records identified herein may be destroyed without approval of the Record Retention Officer. The Record Retention Officer is identified within the schedule.
- **Staff Positions Authorized to Access District Records**
Staff assigned to each administrator may be given access to records under the administrator's responsibility on an as needed basis.
- **Emergency Storage and Retrieval**
In preparation for an emergency, all records necessary for the operation of the school district shall be stored electronically offsite.
- **Litigation Hold Procedures**
In the event of a litigation hold, all forms of data related to the litigation will be identified and maintained offsite under direction of the school solicitor.
- **Record Formats**
Media codes are used to identify the format(s) that 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, blue prints, plans, etc.)
 - F. Photographic
- **Retention Periods**
Retention periods listed on the schedule are given in years, unless otherwise indicated. Upon expiration of the retention period, all identified records will be disposed of in accordance with Board policy and this schedule.
- **Addition and Disposal Procedures**
Addition of new records will occur quarterly, or on an as needed basis. Disposal codes are used to direct the final disposition of records. Records must be disposed of according to 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.

- **Electronic Records**

Electronic records shall be organized in other formats and in accordance with the Records Management Schedule. (Electronic records shall be organized into electronic record systems, which shall be grouped by function, i.e., administrative records, financial records, student records, etc., as detailed in the Records Management Schedule Data Map.) The district will develop and maintain documentation about each electronic record system and organize records in a consistent manner. Email messages, in and of themselves, do not constitute records. The District maintains an archive of all district emails and attachments for a period of 2 years, after which they are deleted.

- **Records Not On Schedule**

For any record not covered by the retention schedule, the Records Management Committee will determine how long the record must be kept and recommend any necessary revisions to the retention schedule.

SCHEDULE AND DATA MAP

Record Description and Designated Responsibility	Record Format	Retention Period (in years)	Disposal Code
Administrative Records - Superintendent			
Feasibility Studies	A,C	3	1,4
PSSA Results	A,C	Permanent	3
Public Record Requests	A,C	1 from date received ¹	1,4
School District Report Cards	A,C	Permanent	3
Strategic Plan	A,C	One (1) copy permanent	3
Benefits/Insurance Records² - Director of Human Resources			
Claims	A,C	6 after settlement	2,4
COBRA Records	A,C	6 ³	
Enrollment Forms	A,C	Term of benefits plus 6	2,4
Policies/Plans/Contracts	A,C	6 after expiration	1,4
Child Labor Records – High School Principal			
Application for Work Permits	A,C	2 after graduation	2,4
Employment Report from Employers	A,C	2 ⁴	2,4
Complaints/Challenges – Superintendent/Director of Human Resources			
Investigation Records	A,C,D,E, F	6 after final resolution	2,4
Made by District Employee(s)	A,C	6 after final resolution ⁵	2,4
Regarding District Employee(s)	A,C	6 after final resolution	1,4
Regarding Instructional Materials or District Programs	A,C	6 after final resolution	1,4
District Organization Records – Superintendent			
District Boundaries/Attendance Areas	A,C,E	Permanent	3

Photographs/Movies of Historical Value	C,D,F	Permanent	3
Employment Contracts – Superintendent			
Administrative Compensation Plan	A,B,C	One (1) copy permanent	3
Collective Bargaining Agreements	A,B,C	One (1) copy permanent	3
Individual Employment Contracts/Board Resolutions	A,C	4 after employment ends	1,4
Facility Use Records – Chief Financial Officer			
Applications	A,C	6	1,4
Fee Schedules	A,C	Current	1,4
Federal Programs – Director of Federal Programs			
Title Program Paperwork	A,C	7 years after close of grant	2,3
Financial Records – Chief Financial Officer			
Accounts Payable	A,C	7	1,4
Accounts Receivable	A,C	7	1,4
Adopted Annual Budget	A, B, C	10	1,4
Annual Financial Reports	A, B, C	7	3
Bank Statements	A, C	7	1,4
Check Registers	A,C	7	1,4
Deposit Slips	A,C	7	1,4
General Ledger	A,B,C	7	3
Grant Records (successful)	A, C	7 after close of grant	1,4
Investment Records	A,B,C	7 after cancellation	1,4
Purchase Orders/Invoices	A,C	7	1,4
Tax Collection Records	A,C	7	1,4
Free and Reduced Lunch Program Records⁷ – Chief Financial Officer			
Accounts/Audits	A,C	5	1,4
Application for Participation ⁸	A,C	5	2,4
Program Requirements	A,C	5	1,4
Grievance/Arbitrations – Superintendent			
Complaint	A,B,C	Permanent	3
District Response	A,B,C	Permanent	3
Final Ruling/Decision of Arbitrator	A,B,C	Permanent	3
Litigation Files – Superintendent			
Pleadings, Motions, Briefs, Other Filings	A,B,C	7 after final conclusion of litigation	1,4
Decision/Ruling	A,B,C	7 after final conclusion of litigation	1,4
Medical Records – Director of Human Resources			
Medical Documentation (employee leave, accommodations)	A,C	6 after employment ends	2,4
Medical Records/Information (employee)	A,C,D,F	6 after employment ends ⁹	2,4
Medical Records/Information (employee exposure to toxic/harmful substance)	A,C,D,F	30 after employment ends ¹⁰	2,4
Pre-Employment Medical Examination ¹²	A,C	6 after employment ends ¹³	2,4
Payroll Records¹⁴ – Director of Human Resources			
Deduction Authorizations	A,C	6	2,4
Direct Deposit Forms	A,C	6	2,4
Employee Earnings Statements (Pay Stubs)	A,C	6 ¹⁵	2,4
Time Cards/Sheets	A,C	6 ¹⁶	1,4
Wage and Tax Statements (W-2 Forms)	A,C	6 ¹⁷	2,4

Withholding Allowance Certificates (W-4 Forms)	A,C	6 after superseded OR employment ends ¹⁸	2,4
Personnel Records¹⁹ – Director of Human Resources			
Acknowledgement of Receipt (Handbooks/Policies)	A,C	6 after superseded OR employment ends	1,4
Advertised Job Openings/Positions	A,C	4 after position Filled ²⁰	1,4
Attendance Records (Employees)	A,C	6 after employment ends	1,4
Background Check Documentation	A,C	6 after employment ends	2,4
Change(s) in Status (Promotion/Demotion/Transfer/Furlough/Recall)	A,C	6 after employment ends ²¹	2,4
Continuing Education/Professional Development	A,C	6 after employment ends	2,4
Credentials (Certificates/Licenses)	A,C	6 after employment ends	1,4
Discipline Records (Employees)	A,C	6 after employment ends	2,4
Employment Application/Resume (Hired)	A,C	6 after employment ends	2,4
Employment Application/Resume (Not Hired)	A,C	4 after position filled ²²	2,4
Employment Eligibility Verification (Form I-9 and Documentation)	A,C	6 after employment ends ²³	2,4
Equal Employment Opportunity Records and Demographics	A,C	3 ²⁴	1,4
Evaluations (Employees)	A,C	6 after employment ends	2,4
Job Description	A,C	6 after employment ends	1,4
Leave Records (FMLA)	A,C	6 after employment ends ²⁵	2,4
Leave Records (Other)	A,C	6 after employment ends	2,4
Office of Employment (Accepted)	A,C	6 after employment ends	1,4
Pre-Employment Reference Checks	A,C	6 after employment ends	2,4
Resignations	A,C	6 after employment ends	1,4
Retirement Records	A,B,C	Permanent	3
Training Certificates/Information	A,C	6 after employment ends	1,4
User Agreement(s)	A,C	6 after employment ends	1,4
Property Records – Chief Financial Officer			
Building Blueprints	C,E	Permanent	3
Construction Contracts	A,B,C	12 after completion ²⁶	1,4
Deeds and Related Records	A,B,C	Permanent	3
Equipment Inventories	A,C	7	1,4
Fixed Asset List	A,B,C	7	3
Inventory Transfer/Disposal Records ²⁷	A,C	5 after transfer/disposition	1,4
Lease (Real Estate)	A,B,C	Permanent	3
Leases (Equipment/Vehicles)	A,B,C	7 after expiration	1,4
Pesticide Application Record	A,C	3 ²⁸	1,4
Real Property Purchase or Sale	A,B,C	Permanent	3
Purchasing Records (Goods and Services) – Chief Financial Officer			
Advertisements	A,C	6 after completion	1,4
Bid Documents (Accepted)	A,C	6 after completion	1,4
Bid Documents (Declined)	A,C	3 after completion	1,4
Executed Contracts	A,C	6 after completion	2,4
Financial Information of Bidders	A,C	3 after completion	2,4
Specifications	A,C	6 after completion	1,4
Written or Telephone Price Quotations	A,C	3 after completion ²⁹	1,4
Safety Records – Director of Human Resources and Assistant Superintendent			

Accident Reports	A,C	6 ³⁰	2,4
Emergency Preparedness Plan	A,C	2 after revised ³¹	1,4
Material Safety Data Sheets (MSDS)	A,C	30 ³²	1,4
Safe School Act Reports	A,B,C	Permanent ³³	3
Visitor Registration	A,C	5	1,4
School Board Records - Superintendent			
Board Meeting Agendas	A,C	1	1,4
Board Minutes (Approved)	A,B,C	Permanent ³⁴	3
Board Policies and Procedures (Current)	A,B,C	Permanent	3
Board Policies and Procedures (Old)	A,B,C	Permanent	3
Ethics Statement of Financial Interest	A,C	5 ³⁵	1,4
Notes, Recordings and/or Any Other Materials Used to Prepare Official Minutes	A,C,D	Until official minutes are approved	1,4
Official Recordings of Board Meetings	C,D	1	1,4
Student Records - Principal and/or Student Services			
Attendance Records: Summary of yearly attendance by student as recorded in cumulative file, written excuses for non-attendance or tardiness	A,C	Attendance summary on report card: 100 years after final enrollment. When excuse is accepted: attendance excuse need not be retained after the absence is recorded as "excused" in attendance system. When excuse is rejected: retain written excuse for one year (or until the conclusion of truancy proceedings, whichever is later) Electronic files erased after two years	2,4
Contracts and Legally Binding Agreements	A,C	6 years	2,4
Counseling Records: School counselor, social worker, and other documentation of group or individual counseling; home/school visitor records	A, C	Retain 6 years after the student ceases to be enrolled in the District	2,4
Court/Police/Legal/Correctional Records Examples: Child Welfare Agency Records; Juvenile Court Records; Family Division Records; Police Records; Truancy Documentation; Social Services Documentation	A,C	Review at least once a year and destroy as soon as usefulness has ended	2,4
Disciplinary Records Examples: Daily Behavior Documentation; Behavior Contract; Discipline and Behavior Referrals/Report; Handwritten Notes; Incident Report; Statement of Student Misconduct; Suspension/Expulsion Records; Summary/Cumulative Discipline Report	A,C	Review at least once a year and destroy as soon as usefulness has ended Review at least once a year and destroy as soon as usefulness has ended (unless transferred to Cat.	2,4

		B). Upon graduation or 2 years after final enrollment	
Early Childhood / Early Intervention Records Examples: Application and Acceptance Documentation; Family Service Plan; Assessment Records; Court Records; Early Childhood / Early Intervention Student Folders; Early Intervention Referral Form; Handwritten Notes; Health Updates; Healthy Child Referral Form; IDEA Compliance Documentation; IEP Documentation; Medical Access Log; Screening Packet; Social Services Info; Student Work Samples; Test Protocols	A,C	7 years from date of submission of final closeout report (unless transferred to cumulative file and maintained for 100 years after final enrollment.)	2,4
Extra-curricular and co-curricular participation records: Participation, contracts, team results, group photographs and/or videos	A, C	Retain until the conclusion of the school year then transfer to student's cumulative file	2,4
Gifted Education Records (Examples: Permission to Evaluate/Reevaluate; Gifted Written Report (GWR); Gifted Individualized Education Plan (GIEP); Notice of Recommended Assignment (NORA))	A,C	6 years after student's exit from the Gifted program	2,4
Grades/Yearly Progress/Classwork Examples (Digital or hardcopy): Classroom Visit/ Observation Records; Correspondence; Final Grades; GED Scores; Original Student Work; Report Card; Student Evaluations; Progress Reports	A,C	Final report cards, Final grades, GED scores: 100 years after student's final enrollment. All other items: Review at least once a year and destroy as soon as usefulness has ended	2,4
Home Education Records: Any records related to a student being homeschooled including affidavits and portfolios	A,C	Retain 6 years after the student ceases to be enrolled	2,4
Information Releases/Requests Examples: Authorization for Release of School Records/ Information; Consent for Release of Medical Information to School; Permission to Exchange Information About a Student; Record of Access to Student File; Records Request Documentation; Release of Records Forms/Requests; Transcript Request Letter	A,C	Maintain for as long as the records being requested are maintained. Review at least once a year and destroy as soon as usefulness has ended	2,4
Protocols for Special Education Evaluations, Gifted Evaluations and Chapter 15 Service Agreements	A,C	Retained for 30 days and then destroyed after usefulness has ended.	2,4
Special Education Records (Examples: Assessment Reports (e.g., Functional Behavioral Assessment, Baseline Assessment); Daily Behavioral Data; ESY Documentation; Evaluation/Reevaluation Report; Individualized Education Program (IEP); Manifestation Determination Review (MDR) Documentation; Notice of Recommended Educational Placement (NOREP); Permission to Evaluate/Reevaluate; Placement Documentation; Positive Behavior Support Plan (PBSP); Progress Reports;	A,C	6 years after student's exit from the Special Education program	2,4

Psychological Evaluations; Correspondence; Section 504 / Chapter 15 Service Agreement for Qualified Students)			
Student Assistance Program Records	A,C	2 years after student's final enrollment	2,4
Student Cumulative Files: Pupil Permanent Record Card; Student Photos; Student Transcripts	A,B,C	100 years after graduation	2,4
Student Medical Records Medical/Psychological Records Examples: Accident Report; Athletics Participation Documentation; Correspondence and Notes; Daily Log of Student Visits/Treatment; Dental Health Records; Hospitalization Records; Immunization Record; Mental Health Records; Occupational Therapy Records; Master Problem Lists; Emergency Care Forms; Health Assessment Records; Health Excuses, Screens and Service Records; Medication Documentation; Psychological Evaluation, Treatment and Other Records, School Confidential Medical Conditions List; Speech and Language Records; Vision Records	A,C	Review at least once a year and destroy as soon as usefulness has ended Medical records transferred to cumulative file will be destroyed 2 years after student's final enrollment	2,4
Student Performance Records: Individual standardized test scores, curriculum-based assessment scores, yearly report cards	A,C	Retain until the conclusion of the school year, then transfer data to cumulative file	2,4
Academics and Scheduling Records			
Class Schedules, Courses Offered, Course Names, Course Descriptions	A, C	4 years	
Course weights, Graduation Requirements	A, C	21 years	
Digital and Temporary Records			
Phone messages, and text messages.	C	Destroy as soon as usefulness has ended	
Digital security camera recordings and Internet Firewall records	C	Overwritten on a recurring schedule as resources dictate (2 weeks to 6 months)	
Email	C	2 years after the email is trashed	
Universal Service Records (E-Rate Program)³² – Chief Financial Officer			
Applications/Discount Verifications/Correspondence	A,C	7 after service year	2,4
Bids/Quotations(accepted/declined); Correspondence; Financial Information of Bidders; Specifications/ RFPs; Bid Evaluations	A,C	7 after service year	2,4
Executed Contracts	A,C	7 after service year	2,4
Filtering Documentation	A,C	7 after service year	2,4
Proof of Payment – Submitted and Received	A,C	7 after service year	2,4
Purchase orders/Installation Records/Invoices	A,C	7 after service year	2,4
Staff Training	A,C	7 after service year	1,4
Technology Plan	A,C	7 after service year	1,4
Workers' Compensation Records – Director of Human Resources³⁸			
Workers' Compensation Records	A,B,C	7 after claim closed	2,4

¹65 P.S. Sec. 67.502(b)(2)(iii) requires that an electronic or paper copy of the written request and all documents submitted with the request be maintained either 1) until the request has been fulfilled; 2) if the request is denied, for thirty (30) day; or 3) if an appeal is filed, until a final determination is made or the appeal is deemed denied. Keeping from 1 year of date request received would be safe for all periods in the Act, establish some precedent for the open records officer, and give evidence of repeated requests (burdensome). 67.506(a).

²29 CFR Sec. 1627.3(b)(2) requires employers to keep "benefit plans" for the term of the plan plus at least 1 year after termination.

³ Retention period not specified in COBRA but recommended that records be retained in accordance with ERISA, See 29 U.S.C. Sec. 1027.

⁴43 P.S. Sec. 58.1(d) requires school districts to keep the required employment report/information for 2 years.

⁵29 CFR Sec. 1602.14 and 1627.3(b)(3) require retention of relevant records until final disposition.

⁶SC 518 requires permanent retention of annual auditor's reports and annual financial reports. SC 518 also requires districts to maintain all other financial records for at least 6 years.

⁷CFR Sec. 210.9 requires free and reduced lunch accounts and records to be maintained for a minimum of 3 years. If a federal audit is being conducted, records must be kept until the audit is completed. SC 1337(e) requires free and reduced lunch accounts and records to be maintained not in excess of 5 years.

⁸47 CFR Sec. 54.516 requires a school district that uses free/reduced-price meal applications as the basis for their federal Universal Service funding under the E-Rate program to retain these applications for 5 years.

⁹29 CFR Sec. 1627.3(b)(1)(v) requires the results of any physical examination to be kept for at least 1 year from the date of the personnel action which the records related when the exams results are considered in connection with any personnel action. If an enforcement action is under way, the required records shall be maintained until final disposition.

¹⁰29 CFR Sec. 1910.1020(d)(1)(i) requires the retention of "employee medical records" for at least the duration of employment plus 30 years. 29CFR Sec. 1910.1020(d)(1)(iii) requires the retention of "employee exposure records" for at least 30 years. Terms are defined in 29 CFR Sec. 1910.1020©(5), (6). See 29 CFR Sec. 1910.1020(b) for applicability.

¹¹SC 1409 requires that all student health records be confidential and not destroyed for at least 2 years after the student is no longer enrolled. The school may surrender the health records to the parent/guardian if the student will not be enrolling in another school in Pennsylvania. 28 PA Code Sec. 23.55 required the student's health records be maintained in the school building that the student attends.

¹² 42 U.S.C. Sec. 12112(d)(3)(B), 29 CFR Sec. 1630.14(c)(1) requires that this information be collected on separate forms, kept in separate files and be treated as confidential medical records.

¹³29 CFR Sec. 1627.3(b)(1)(v) requires the results of any physical examination to be kept for at least 1 year from the date of the personnel action which the records relate when the exam results are considered in connection with any personnel action. If an enforcement action is under way, the required records shall be maintained until final disposition.

¹⁴29 CFR Sec. 516.5, 516.6, 1620.32 and 1627.3(a) require retention of specified payroll records/information for at least 1-3 years. SC518 requires retention of financial records for at least 6 years.

¹⁵29 CFR Sec. 516.6(c)(1) requires retention of records of additions to or deductions from wages paid for at least 2 years.

¹⁶29 CFR Sec. 516.6(a)(1) requires retention of time cards/sheet for at least 2 years when used to determine pay period earnings or wages.

¹⁷26 CFR 31.6001.1(e)(2) requires the retention of tax records for at least 4 years after the due date of the tax for the return period that the records relate or the date the tax is paid, whichever is later. PHMC recommendation for local governments was 4 years.

¹⁸26 CFR 31.6001.1(e)(2) required the retention of tax records for at least 4 years after the due date of the tax for the return period that the records relate or the date the tax is paid, whichever is later. PHMC recommendation for local governments was 4 years.

¹⁹29 CFR Sec. 1602.14 requires employers to keep any personnel or employment records for at least 1 year from the date of making the record or the personnel action involved, whichever is later. If a claim is filed or action is under way, the relevant records shall be maintained until final disposition.

²⁰29 CFR Sec. 1627.3(b)(1)(vi) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition.

²¹29 CFR Sec. 1627.3(b)(1)(i) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition. Statute of limitation under 42 U.S.C. 1981 is 4 years.

²²29 CFR Sec. 1627.3(b)(1)(i) lists records to be kept for 1 year. If an enforcement action is under way, the required records shall be maintained until final disposition. Statute of limitations under 42 U.S.C. 1981 is 4 years.

²³8 U.S.C. Sec. 1324a(b)(3) and 8 CFR Sec. 274a2(b)(2)(i)(A) requires retention for 3 years after the date of the hire or 1 year after the individual's employment is terminated, whichever is later.

²⁴29 CFR Sec. 1602.39, 1602.41 requires form EEO-5 and records necessary to complete EEO-5 to be maintained for 3 years. 1602.40 lists personnel records that must be kept for 2 years.

²⁵CFR Sec. 825.500(b) requires specified FMLA records to be kept for no less than 3 years.

²⁶42 Pa. C.S.A. Sec. 5536 states that civil actions regarding construction projects must be commenced within 12 years after completion of the construction.

²⁷47 CFR Sec. 54.516 requires school districts to maintain records on equipment funded through the federal E-Rate program for Universal Service for at least 5 years from the date of the funding year's purchase; records should indicate the disposal method or document information regarding the transfer.

²⁸SC 772.2(b)(2) requires each school to maintain detailed records of all chemical pest control treatments for at least 3 years.

²⁹SC 751 and 807.1 require the retention of written price quotations and written records of telephone price quotations for 3 years.

³⁰29CFR Sec. 1904.33(a) requires the retention of the OSHA incident report forms for 5 years following the end of the calendar year that the records cover.

³¹35 PA. C.S.A. Sec. 7701(g) requires plan to be reviewed annually and updated as necessary.

³²29 CFR Sec. 1910.1020©(5) defines "employee exposure records" to include material safety data sheets (MSDS) indicating that the material may pose a hazard to human health. See 29 CFR Sec. 1910.1020(d)(l)(ii) for exceptions and alternate records.

³³SC 1317.2 (BEC) Sec. IV issued July 1, 2002, SC 1307-A also requires school entities to maintain records of all applicable incidents but does not list retention period(s).

³⁴SC 518 requires permanent retention of the "minute book" of each district.

³⁵65 Pa. C.S.A. Sec. 1107(9) requires the retention of financial interest statements for 5 years from date of receipt.

³⁶22 PA Code Sec. 12.32 requires each district to develop a plan for the collection, maintenance and dissemination of student records.

³⁷47 CFR Sec. 54.516 required school districts who receive federal Universal Service funding through the E-Rate program to retain all related documentation for at least 5 years after the last day of service delivered in a particular funding year.