Book	Policy Manual
Section	(J) OPERATIONS
Title	Policy J101 - Document Management
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Section: Operations

I. Purpose

The Joint Committee recognizes the importance of establishing and maintaining a Records Management Plan that defines School staff responsibilities and complies with federal and state laws and regulations. This Policy outlines the guidelines for the development of a Records Management Plan to be included as or within Administrative Regulations governing the retention, management and destruction of School records. The Executive Director or the Executive Director's designee shall work with appropriate administrative staff and the School's Solicitor to develop such Records Management Plan and Administrative Regulations which are necessary and appropriate to ensure compliance with applicable federal and state laws and regulations.

II. Definitions

A. Records - includes recorded information, regardless of form, that is created or received or retained in accordance with the School's official business. Email messages and other electronic information do not constitute "records" unless the function and content of the message warrants retention under applicable law, policies or regulations.
B. Records Management Plan - the system implemented by the School for the retention, retrieval, and disposition of all records generated by School operations.
C. Records Retention Schedule - a comprehensive listing stating retention periods and proper disposition of records.

III. Authority

A. Particular Records
The Joint Committee shall retain, as a permanent record of the Joint Committee minutes, annual auditor's reports and annual financial reports. All other financial records, including financial account books,orders, bills, contracts, invoices, receipts and purchase orders, shall be retained by the School for a period of not less than six (6) years or as required by law.

All other School records shall be retained in accordance with state and federal law and regulations and the School Records Management Plan approved by the Joint Committee and periodically reviewed by the Executive Director's designee or designees.

The School shall make a good faith effort to comply with all proper requests for record production. Selective destruction of records in anticipation of litigation is forbidden.

B. Records Management Plan

The School's Records Management Plan shall be the principal means for the retention, retrieval, and disposition of manual and electronic records, including e-mails. The Plan shall not rely primarily on backup systems to manage the retention and disposition of records.

The Records Management Plan shall include:

1. Comprehensive listing of records and data of the School.
2. Criteria to distinguish records of the School 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 and employee designated for determining whether an item is a record.
7. Procedures for adding, revising or deleting records and data, and any other details necessary to implement the RecordsManagement Plan.
8. Records Retention Schedule.
9. Provisions for the storage and retrieval of records in the event of an emergency or disaster.
10. Staff positions authorized to access School records.
11. Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all records relevant to thecurrent 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 School's compliance with the litigation hold
f) In what format the records will be collected.

When possible, records and data shall be stored in their original form, including metadata, such as creation date, author, type of file,etc.
For any record not covered by the Records Retention Schedule, the Executive Director or designee shall determine how long the record shall be kept and recommend any necessary revisions to the retention schedule.
The School shall maintain and dispose of records in a manner that protects any sensitive, proprietary or confidential information or individual privacy rights, and helps conserve natural resources.

C. General Requirements
The Records Management Plan regarding record retention shall address the manner in which records are to be maintained and purged and must differentiate between those records that are maintained in manual form and those records maintained in electronic form.

D. Contractors
Records created or maintained by contractors employed by the Joint Committee shall be retained and disposed of in accordance with the Records Management Plan.

IV. Delegation of Responsibility

The Executive Director or the Executive Director's designee shall work with appropriate administrative staff and the District's Solicitor to develop the Records Management Plan such Administrative Regulations which are necessary and appropriate to ensure compliance with applicable federal and state laws and regulations.

References: Right-to-Know Law – 65 P.S. Sec. 67.101 et seq.
Family Educational Rights and Privacy Act – 20 U.S.C. Sec.1232g Federal Rules of Civil Procedure –16, 26, 34, 37, 45

Adopted: 3/13/13

See also:
DP J101 - Document Management