

HEMPFIELD AREA SCHOOL DISTRICT

No. 800-AR-1

ADMINISTRATIVE REGULATION

APPROVED: February 8, 2017

REVISED:

800-AR-1. RECORDS RETENTION SCHEDULE

How to Use the Records Retention Schedule

The Records Retention Schedule lists records that are created, received or retained as a result of district operations. 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.

Record Formats

Media codes are used to identify the format(s) that the district may use 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.

Disposal Codes

Disposal codes are used to direct the final disposition of records. Records must be disposed of according to the 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.

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

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Administrative Records				
Comprehensive/Strategic Plans	A,C	Public	1 copy permanent	3
Feasibility Studies	A,C	Public	3	1,4
PSSA/Keystone Exam Results	A,C	Public	Permanent	3
Public Record Requests	A,C	Public	1 from date received or until all appeals have been exhausted ¹	1,4
Benefits/Insurance Records²				
Claims	A,C	Public	6 after settlement	2,4
COBRA Records	A,C	Public	6 ³	2,4

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Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Enrollment Forms	A,C	Public	term of benefits plus 6	2,4
Policies/Plans/Contracts	A,C	Public	6 after expiration	1,4
Child Labor Records				
Applications for Work Permits	A,C	Exempt	2 after graduation	2,4
Employment Report from Employers	A,C	Exempt	2 ⁴	2,4
Complaints/Challenges				
Investigation Records	A,C,D,E,F	Exempt	6 after final resolution	2,4
Made By District Employee(s)	A,C	Exempt	6 after final resolution ⁵	2,4
Regarding District Employee(s)	A,C	Confidential	6 after employment ends	2,4
Regarding Instructional Materials or District Programs	A,C	Public	6 after final resolution	1,4
District Organization Records				
District Boundaries/Attendance Areas	A,C,E	Public	Permanent	3
Photographs/Movies of Historical Value	C,D,F	Public	Permanent	3
Employment Contracts				
Administrative Compensation Plan	A,B,C	Public	1 copy permanent	3
Collective Bargaining Agreements	A,B,C	Public	1 copy permanent	3
Individual Employment Contracts/Board Resolutions	A,C	Public	4 after employment ends	1,4
Facility Use Records				
Applications	A,C	Public	6	1,4
Fee Schedule(s)	A,C	Public	Current	1,4
Financial Records⁶				
Accounts Payable	A,C	Public	6	1,4
Accounts Receivable	A,C	Public	6	1,4
Adopted Annual Budget	A,B,C	Public	10	1,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 4

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Annual Financial Reports	A,B,C	Public	Permanent	3
Annual Audit Reports	A,B,C	Public	Permanent	3
Bank Statements	A,C	Public	6	1,4
Check Registers	A,C	Public	6	1,4
Deposit Slips	A,C	Public	6	1,4
General Ledger	A,B,C	Public	Permanent	3
Grant Records (Successful)	A,C	Public	6 after close of grant, or period required by grant if longer	1,4
Investment Records	A,B,C	Public	6 after cancellation	1,4
Purchase Orders/Invoices	A,C	Public	6	1,4
Tax Collection Records	A,C	Public	6	1,4
Food Service Program Records⁷				
Accounts/Records/Reports	A,C	Contains exempt information	6 or until completion of active audit	1,4
Free and Reduced Lunch Program Records⁸				
Accounts/Audits	A,C	Public	6	1,4
Application for Participation ⁹	A,C	Exempt	10	2,4
Program Requirements	A,C	Public	6	1,4
Grievances/Arbitrations				
Complaint	A,B,C	Exempt	Permanent	3
District Response	A,B,C	Exempt	Permanent	3
Final Ruling/Decision of Arbitrator	A,B,C	Public	Permanent	3
Litigation Files				
Decision/Ruling	A,B,C	Public	7 after final conclusion of litigation	1,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 5

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Pleadings, Motions, Briefs, Other Filings	A,B,C	Public	7 after final conclusion of litigation	1,4
Settlements	A,B,C	Public	7 after settlement	2,4
Medical Records				
Medical Documentation (Employee Leave, Accommodations)	A,C	Confidential	6 after employment ends	2,4
Medical Records/Information (Employee)	A,C,D,F	Confidential	30 after employment ends ¹⁰	2,4
Medical Records/Information (Employee Exposure to Toxic/Harmful Substances)	A,C,D,F	Confidential	30 after employment ends ¹¹	2,4
Medical Records/Information (Student)	A,C,D,F	Confidential	6 after enrollment ends ¹²	2,4
Pre-Employment Medical Examination ¹³	A,C	Confidential	6 after employment ends ¹⁴	2,4
Payroll Records¹⁵				
Deduction Authorizations	A,C	Contains exempt information	6	2,4
Direct Deposit Forms	A,C	Exempt	6	2,4
Employee Earnings Statements (Pay Stubs)	A,C	Contains exempt information	6 ¹⁶	2,4
Time Cards/Sheets	A,C	Public	6 ¹⁷	1,4
Wage and Tax Statements (W-2 Forms)	A,C	Contains exempt information	6 ¹⁸	2,4
Withholding Allowance Certificates (W-4 Forms)	A,C	Contains exempt information	6 after superseded OR employment ends ¹⁹	2,4
Personnel Records²⁰				
Advertised Job Openings/Postings	A,C	Public	4 after position filled ²¹	1,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 6

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Arrest/Conviction Report Forms (PDE-6004)	A,C	Confidential	30 after employment ends	2,4
Attendance Records	A,C	Public	6 after employment ends	1,4
Change(s) in Status (Promotion/Demotion/Transfer/Furlough/Recall)	A,C	Public	6 after employment ends ²²	2,4
Child Abuse Clearance Statement	A,C	Confidential	30 after employment ends	2,4
Child Abuse Recognition and Reporting Training	A, C	Public	6 after superseded OR employment ends	2,4
Continuing Education/Professional Development/Training ²³	A,C	Contains exempt information	6 after employment ends	2,4
Credentials (Certificates/Licenses)	A,C	Public	6 after employment ends	1,4
Criminal History Records (State and Federal)	A,C	Confidential	30 after employment ends	2,4
Discipline Records	A,C	Exempt	6 after employment ends	2,4
Employment Application/Resume (Hired)	A,C	Contains exempt information	6 after employment ends	2,4
Employment Application/Resume and All Other Application Materials for Candidates Not Hired	A,C	Contains exempt information	4 after position filled ²⁴	2,4
Employment Eligibility Verification (Form I-9 and Documentation)	A,C	Contains exempt information	6 after employment ends ²⁵	2,4
Employment History Verifications	A,C	Confidential	30 after employment ends	2,4
Equal Employment Opportunity Reports and Demographics	A,C	Public	3 ²⁶	1,4
Evaluations/Classroom Teacher Rating/Data	A,B,C	Exempt	6 after employment ends ²⁷	2,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 7

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Evaluations/Performance Assessments/Non-Teachers	A,C	Exempt	6 after employment ends	2,4
Job Description	A,C	Public	6 after employment ends	1,4
Leave Records (FMLA) ²⁸	A,C	Confidential	6 after employment ends ²⁹	2,4
Leave Records (Other)	A,C	Contains exempt information	6 after employment ends	2,4
Network/System User Agreement(s)	A,C	Public	6 after employment ends	1,4
Offer of Employment (Accepted)	A,C	Public	6 after employment ends	1,4
Pre-Employment Reference Checks ³⁰	A,C	Exempt	6 after employment ends	2,4
Resignations	A,C	Public	6 after employment ends	1,4
Retirement Records	A,C	Contains exempt information	7 years after employment ends	1,4
Property Records				
Building Blueprints	C,E	Exempt	Permanent	3
Construction Contracts	A,B,C	Public	12 after completion ³¹	1,4
Deeds and Related Records	A,B,C	Public	Permanent	3
Equipment Inventories	A,C	Public	6, 10 for any equipment purchased with Category 2 E-rate funds ³²	1,4
Fixed Asset List	A,B,C	Public	Permanent	3

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 8

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Inventory Transfer/Disposal Records	A,C	Public	6 after transfer/disposition, 10 for any equipment purchased with Category 2 E-rate funds ³³	1,4
Leases (Real Estate)	A,B,C	Public	Permanent	3
Leases (Equipment/Vehicles)	A,B,C	Public	6 after expiration	1,4
Pesticide Application Record	A,C	Public	3 ³⁴	1,4
Real Property Purchase or Sale	A,B,C	Public	Permanent	3
Purchasing Records (Goods and Services)				
Advertisements	A,C	Public	6 after completion	1,4
Bid Documents (Accepted)	A,C	Public	6 after completion	1,4
Bid Documents (Declined)	A,C	Public	6 after completion	1,4
Executed Contracts	A,C	Public	6 after completion	2,4
Financial Information of Bidders	A,C	Exempt	6 after completion	2,4
Specifications	A,C	Public	6 after completion	1,4
Written or Telephonic Price Quotations	A,C	Public	6 after completion ³⁵	1,4
Safety Records				
Accident Reports	A,C	Contains exempt information	6 ³⁶	2,4
Emergency Preparedness Plan and Supporting Documents ³⁷	A,C	Contains exempt information	2 after revised ³⁸	1,4
Material Safety Data Sheets (MSDS)	A,C	Public	30 ³⁹	1,4
Memorandum of Understanding with Local Law Enforcement	A,C	Contains exempt information	2 after revised	1,4
Reports of Suspected Child Abuse	A,C	Confidential	1 after the year in which the student turns age 50	2,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 9

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Safe School Act Reports - Annual Report	A,B,C	Public	Permanent ⁴⁰	3
Security Tapes and Images (Pulled from routine tape rotation)	C,D,F	Contains exempt information	Until resolution of incident or transfer to student's educational records	2,4
Visitor Log	A,C	Public	5	1,4
School Board Records				
Board Meeting Agendas	A,C	Public	1	1,4
Board Minutes (Approved)	A,B,C	Public	Permanent ⁴¹	3
Board Policies and Procedures (Current)	A,B,C	Public	Permanent	3
Board Policies and Procedures (Old)	A,B,C	Public	Permanent	3
Ethics Statement of Financial Interest	A,C	Contains exempt information	5 ⁴²	1,4
Notes, Recordings and/or Any Other Materials Used to Prepare Official Minutes	A,C,D	Public	Until official minutes are approved	1,4
Oath of Office (Signed by Board Member) ⁴³	A	Public	Term of office	1
Official Recordings of Board Meetings	C,D	Public	1	1,4
Student Records		Refer to Student Records Plan ⁴⁴		
Transportation Records (Drug/Alcohol Testing)⁴⁵				
Negative or Below Limit Test Results	A,C	Exempt	1	2,4
Positive or Above Limit Test Results	A,C	Exempt	5	2,4
Records Related to Collection Process	A,C	Exempt	2	2,4
Records Related to Education and Training	A,C	Exempt	2 after employment ends	2,4
Refusal to Take Required Test	A,C	Exempt	5	2,4
Transportation Records (General)⁴⁶				
Accident and Incident Reports	A,C	Contains exempt information	3	2,4

800-AR-1. RECORDS RETENTION SCHEDULE - Pg. 10

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Claims for Reimbursement ⁴⁷	A,C	Public	6	2,4
Distances from Student Homes to Established Bus Stops	A,C,E	Contains exempt information	Current and last revision	2,4
List of Bus Routes/Schedules/Loading Zones/Bus Stops	A,B,C,E,F	Public	Current and last revision (at least 1 year)	2,4
Record of Students Transported to and from School	A,C	Confidential	6 from end of school year	2,4
Universal Service Records (E-Rate Program)⁴⁸				
Applications/Discount Verifications/Correspondence	A,C	Public	10 after service year	2,4
Bids/Quotations (accepted/declined); Correspondence; Financial Information of Bidders; Specifications/RFPs; Bid Evaluations	A,C	Contains exempt information	10 after service year	2,4
Executed Contracts	A,C	Public	10 after service year	2,4
Filtering Documentation	A,C	Public	10 after service year	2,4
Proof of Payment – Submitted and Received	A,C	Public	10 after service year	2,4
Purchase Orders/Installation Records/Invoices	A,C	Public	10 after service year	2,4
Staff Training and Education of Students in Online Behavior	A,C	Public	10 after service year	1,4
Volunteer Records				
Application/Acknowledgement Forms	A,C	Contains exempt information	30 after service ends	2,4
Affidavit for Waiver of Federal Criminal History Check	A,C	Contains exempt information	30 after service ends	2,4
Arrest/Conviction Report Forms	A,C	Confidential	30 after service ends	2,4
Criminal History Records (State)	A,C	Confidential	30 after service ends	2,4

Record Description	Record Format	Record Classification	Retention Period (in years)	Disposal Code
Criminal History Records (Federal – If Required)	A,C	Confidential	30 after service ends	2,4
Workers' Compensation Records	A,B,C	Exempt	7 after claim closed	2,4

¹ 65 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) days; or 3) if an appeal is filed, until a final determination is made or the appeal is deemed denied. Since appeals may be made to court after a final determination, requests and related documents should be kept until all appeals have been exhausted. Keeping requests for 1 year from the date the request was received, or until all appeals have been exhausted, would satisfy most time periods in the Act and preserve evidence of repeated requests for the same records (burdensome). 67.506(a).

² 29 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.

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

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

⁶ SC 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.

⁷ SC 1337(e) requires food service records to be maintained not in excess of 5 years; however, compliance with PA Dept. of Education, Division of Federal Programs monitoring under the Uniform Grant Guidance requires records to be maintained for 6 years, so retention period was updated to reflect federal monitoring requirements.

⁸ 7 CFR 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.

⁹ 47 CFR Sec. 54.516 requires a school district who 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 10 years.

¹⁰ 29 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 to 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. 29 CFR Sec. 1910.1020(d)(1)(i) requires the retention of "employee medical records" for at least the duration of employment plus 30 years.

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

¹² SC 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 requires the student's health records be maintained in the school building that the student attends.

¹³ 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.

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- ¹⁴ 29 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 to 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.
- ¹⁵ 29 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. SC 518 requires retention of financial records for at least 6 years.
- ¹⁶ 29 CFR Sec. 516.6(c)(1) requires retention of records of additions to or deductions from wages paid for at least 2 years.
- ¹⁷ 29 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.
- ¹⁸ 26 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 to, or the date the tax is paid, whichever is later.
- ¹⁹ 26 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 to, or the date the tax is paid, whichever is later.
- ²⁰ 29 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.
- ²¹ 29 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.
- ²² 29 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.
- ²³ 7 CFR 210.15 requires that records on professional development/training for professional standards for school nutrition program directors, managers and personnel must be maintained for a period of 3 years.
- ²⁴ 29 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.
- ²⁵ 8 U.S.C. Sec. 1324a(b)(3) and 8 CFR Sec. 274a.2(b)(2)(i)(A) requires retention for 3 years after the date of the hire or 1 year after the date the individual's employment is terminated, whichever is later.
- ²⁶ 29 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.
- ²⁷ SC 1123(f)(3) requires teacher performance ratings of "needs improvement" to be retained for 10 years. 22 PA Code Sec. 19.1 requires school entities to establish a "permanent record system" for ratings
- ²⁸ 29 CFR Sec. 825.500(g) requires medical records and documents created for FMLA purposes be maintained as confidential medical records in separate files from the usual personnel files.
- ²⁹ 29 CFR Sec. 825.500(b) requires specified FMLA records to be kept for no less than 3 years.
- ³⁰ 43 P.S. Sec. 1321 defines "personnel file" to exclude "letters of reference".
- ³¹ 42 Pa. C.S.A. Sec. 5536 states that civil actions regarding construction projects must be commenced within 12 years after completion of the construction.
- ³² 47 CFR Sec. 54.516 requires school districts who receive federal Universal Service funding through the E-Rate program to retain asset and inventory records of equipment purchased as part of Category 2 services for 10 years after purchase.
- ³³ 47 CFR Sec. 54.516 requires school districts who receive federal Universal Service funding through the E-Rate program to retain asset and inventory records of equipment purchased as part of Category 2 services for 10 years after purchase.
- ³⁴ SC 772.2(b)(2) requires each school to maintain detailed records of all chemical pest control treatments for at least 3 years.
- ³⁵ SC 751 and 807.1 require the retention of written price quotations and written records of telephonic price quotations for 3 years; for federal purchasing under Uniform Grant Guidance, PA Dept. of Education, Division of Federal Programs monitoring requires 6 years.
- ³⁶ 29 CFR 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.

³⁷ Supporting documents would be the materials listed in 22 Pa Code 10.24(g)(1-11.)

³⁸ 35 Pa. C.S.A. Sec. 7701(g) requires plan to be reviewed annually and updated as necessary.

³⁹ 29 CFR Sec. 1910.1020(c)(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)(1)(ii) for exceptions and alternate records.

⁴⁰ Refers to the annual report required by SC 1303-A(b). Historical data is maintained by the state. SC 1307-A also requires school entities to maintain records of all applicable incidents but does not list retention period(s).

⁴¹ SC 518 requires permanent retention of the “minute book” of each district.

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

⁴³ SC 321 requires members to subscribe (in writing) to the oath of office.

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

⁴⁵ 49 CFR 382.401 lists applicable retention periods. 49 CFR 382.405 puts limits on release of records.

⁴⁶ 22 Pa. Code Sec. 23.4 lists records required to be kept by local Boards.

⁴⁷ 22 Pa. Code Sec. 23.32.

⁴⁸ 47 CFR Sec. 54.516 requires school districts who receive federal Universal Service funding through the E-Rate program to retain all related documentation for at least 10 years after the last day of service delivered in a particular funding year.