



## **O-03 Public Records / Retention / Disposal**

It is the policy of the School that openness leads to a better informed parents, which leads to better school and better public policy. It is the policy of school to strictly adhere to the State's Public Records Act. All exemptions to openness are to be construed in their narrowest sense and any denial of public records in response to a valid request must be accompanied by an explanation, including legal authority, as outlined in the State Regulations. If the request for public records is in writing, the explanation of denial must also be in writing.

### **Definition**

The School, in accordance with the State Law, defines records as including the following: Any document – paper, electronic (including, but not limited to, e-mail), or other format – that is created or received by, or comes under the jurisdiction of a public office that documents the organization, functions, policies, decisions, procedures, operations, or other activities of the office. All records of this Office are public unless they are specifically exempt from disclosure under the State Law.

### **Organization and Maintenance**

It is the policy of the School that, as required by State Law, records will be organized and maintained so that they are readily available for inspection and copying. Record retention schedules are to be updated regularly and posted prominently.

### **Public Records Requests & Responses**

#### **Evaluation of a Public Records Request**

Each request for public records should be evaluated for a response using the following guidelines:

#### **Identification of Public Records Requested**

Although no specific language is required to make a request, the requester must at least identify the records requested with sufficient clarity to allow the public office to identify, retrieve, and review the records. If it is not clear what records are being sought, the records custodian must contact the requester for clarification, and should assist the requestor in revising the request by informing the requester of the manner in which the office keeps its records.

#### **Method of Public Records Request and Identity of Requestor**

The requester does not have to put a records request in writing, and does not have to provide his or her identity or the intended use of the requested public record. It is School's general policy that this information is not to be requested.

#### **Availability of Public Records for Inspection and Production of Copies**

Public records are to be available for inspection during regular business hours, with the exception of published holidays. Public records must be made available for inspection promptly. Copies of public records must be made available within a reasonable period of time. "Prompt" and "reasonable" take into account the volume of records requested, the proximity of the location where the records are stored, and the necessity for any legal review of the records requested.

#### **Time Constraints for Satisfying Public Records Requests**

Each request should be evaluated for an estimated length of time required to gather the records. If feasible, routine requests for records should be satisfied immediately. Routine requests include, but are not limited to, meeting minutes (both in draft and final form), budgets, salary information, forms and applications, personnel



rosters, etc. If fewer than 20 pages of copies are requested or if the records are readily available in an electronic format that can be e-mailed or downloaded easily, these should be made as quickly as the equipment allows. All requests for public records must either be satisfied or be acknowledged in writing by the School within a reasonable timeframe following the School's receipt of the request. If a request will not be satisfied within a reasonable timeframe or the allowed state requirements, the acknowledgement must include at least the following:

- A request for clarification (if necessary)
- An estimated cost if copies are requested

### **Denial of Public Records Requests**

Any denial of public records requested must include an explanation, including legal authority. If portions of a record are public and portions are exempt, the exempt portions are to be redacted and the rest released. If there are redactions, each redaction must be accompanied by a supporting explanation, including legal authority.

### **Costs for Obtaining Copies of Public Records**

Those seeking public records will be charged only the actual cost of making copies, as follows:

- The charge for paper copies is 10 cents per page.
- The charge for downloaded computer files to a compact disc is \$1 per disc.
- There is no charge for documents e-mailed.
- Requesters may ask that documents be mailed to them. They will be charged the actual cost of the postage and mailing supplies.

### **E-Mail as Public Records**

Documents in electronic mail format are records as defined by the State Law when their content relates to the business of the office. E-mail is to be treated in the same fashion as records in other formats and should follow the same retention schedules.

### **Private E-mail Accounts Holding Public Records**

Records in private e-mail accounts used to conduct public business are subject to disclosure, and all employees or representatives of the School are instructed to retain their e-mails that relate to public business (see Section 1 Public Records) and to copy them to their business e-mail accounts and/or to the Office's records custodian.

### **Applicability**

This Policy applies to all physical records generated in the course of the School's daily operations, including both original documents and reproductions. It also applies to the electronic documents described above.

### **Record Retention**

**Purpose:** The orderly acquisition, storage and retention of public records are essential for the overall efficient and effective operation of the Board of Directors and School. The purpose of this policy is to provide a retention schedule to ensure that necessary records and documents are adequately protected and maintained, and that once they are no longer needed for administrative, fiscal or legal purposes, said documents may be disposed of in the proper manner. In addition, this policy shall function as a guideline to aid the Board's Record Custodians in understanding their obligations concerning public records.



**Record Custodians:** The Record Custodians shall consist of Board Counsel, the Fiscal Officer and the School Operator, as identified below. Each Record Custodian shall ensure the safekeeping and proper disposal of the Board's public records that it is responsible for in accordance with the retention schedule, attached hereto as Schedule A, as well as for any other public records that are in its possession.

**Retention Policy:** The Board of Directors recognizes that it is essential to retain all documents necessary for the operation of the School, accounting records, tax returns, documents necessary for potential IRS inquiries and audits, and all documents that might be relevant in pending, imminent, or reasonably foreseeable investigations or litigation.

The Board of Directors also recognizes, however, that with the passage of time the required retention periods will have expired and most documents will no longer fall into any of these categories, and there is no business reason to incur the cost and administrative burden of storing these unnecessary documents.

Moreover, reducing the volume of retained documents lowers the cost and time required to retrieve documents that are important to the Board's ongoing operations. It is the Board's policy to create and maintain its public records in electronic formats where possible and in its best interests.

From time to time, the Board may issue a notice, known as a "legal hold," suspending the destruction of records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, government investigations, or similar proceedings. No records specified in any legal hold may be destroyed, even if the scheduled destruction date has passed, until the legal hold is withdrawn in writing by the Board.

The following retention schedule is an attempt to identify any and all categories of records that may apply to the operation of the School. The inclusion of a type of record on the schedule does not mean that such records are in fact created or received by the Board or the Record Custodians.

The Board authorizes disposal of a public record when all of the following conditions are met:

1. The record is not required to be retained by federal, state, or local statutes, rules, regulations, or guidance;
2. The record is not subject to a litigation hold directive from the Board's legal counsel;
3. The record is not related to actual, pending, or threatened litigation against or involving the Board; and
4. The record is not subject to a continuing Retention Period on the attached Schedule A.



## SCHEDULE A

### RECORDS CATEGORIES AND RETENTION PERIODS

Schedule No.	Record Title and Description	Retention Period
<b><u>ADMINISTRATIVE RECORDS</u></b>		
101	Minutes of Public Meetings	Permanent
102	Official audio recordings of Public Meetings	Until superseded by the Board's adoption of meeting minutes
103	Blueprints, plans, and maps of real property owned or leased by the Board	Permanent
104	Deeds, easements, and leases of real property owned or leased by the Board	Permanent
105	Official copies of resolutions adopted by the Board	1 year after superseded
106	Official administrative records and regulations of the Board	1 year after superseded
107	Judicial decisions wherein the Board is a party	Permanent
108	Official documents concerning claims and litigation wherein the Board is a party	Permanent
109	Official documents concerning election or appointment of members of the Board's Governing Authority	4 years
110	Budget Policy Files	5 years
111	Bank Depository Agreements	4 years after completion
112	Agendas for Public Meetings of the Governing Authority	1 calendar year**
113	Courses of Study	Until Superseded
114	Special Education Programs	Until Superseded
115	Other Special Programs	Until Superseded
<b><u>EMPLOYEE RECORDS</u></b>		
201	Employee Files	Permanent
202	Civil Rights, Civil Services, and Disciplinary Reports for Employees	Permanent
203	Retirement Letters of Former Employees	Permanent
204	Records of Substitute Teachers	4 years after termination of employment
205	Employment Agreements	4 years after termination of employment
206	Professional Conference Applications for employees	2 years
207	Irregular Employment Agreements for persons employed in a temporary capacity (substitutes, etc.)	4 years after expiration of agreement
208	Unemployment Claims by former employees	5 years
209	Unemployment Records	5 years
210	Applications submitted by persons seeking employment	1 year**
211	Schedules and Rosters of persons employed	Fiscal Year + 2 years
212	Applications submitted by student helpers	2 years
213	Teacher Personnel Reports (internal)	Fiscal year + 1 year
214	I-9 Immigration Verification Forms	Termination of employment + 1 year
215	Job Descriptions	Until superseded or obsolete



**300 STUDENT RECORDS**

301	Student Record Folders containing the following: <ul style="list-style-type: none"><li>• Enrollment / Withdrawal Information</li><li>• Grades / Transcripts</li><li>• Activities Record</li><li>• Attendance Records</li><li>• Individual test Results (standardized, competency/proficiency, and aptitude)</li><li>• Intervention Records</li><li>• Foreign Exchange records</li><li>• Suspensions / Expulsions</li><li>• Home-Schooled Student Records</li></ul>	Permanent
302	Health/Medical Records of Students <ul style="list-style-type: none"><li>• Visual Screening</li><li>• Hearing Screening</li><li>• Immunization Records</li></ul>	2 years after graduation
303	Discipline Records <ul style="list-style-type: none"><li>• Letters to Parents</li><li>• Office Discipline</li></ul>	1 year after graduation/withdrawal
304	Psychological Records (Restricted)	Permanent
305	Child Abuse / Neglect Referral Letters	1 year after graduation/withdrawal
306	Teacher Grade Books / Records	3 years**
307	Pre-School Screening Profiles	3 years
308	Age and Schooling Records (Work Permits)	3 years
309	Accident Reports	2 years after Student reaches the age of 18
310	Individual Educational Plans (IEPs)	20 years
311	Free/Reduce Price Lunch Application	4 years
312	Emergency Information	1 year after graduation/withdrawal
<b>400 BUILDING RECORDS</b>		
401	Tornado and Fire Drill Records	1 year*
402	Building Health Inspections	2 years*
403	Student Activity Records <ul style="list-style-type: none"><li>• Pay-in forms</li><li>• Pay-out forms</li><li>• Account forms / distributions</li><li>• Budget forms</li><li>• Requisitions</li><li>• Purchase orders</li><li>• Ticked sale reports</li></ul>	2 years**
404	Inventories of Textbooks	Until superseded
405	Inventory of supplies	Until superseded
406	Student Handbooks	Until superseded



**500 CENTRAL OPERATIONS**

501	School Calendars	5 years
502	Repair, Installation, and Maintenance Records for personal and real property	4 years**
503	Rental Information for facilities	4 years**
504	Work Orders initiated by Board	4 years**
505	Environmental Reports and Data for real property	4 years**
506	Vandalism Reports concerning property	4 years**
507	Student Activity Purpose Clauses	4 years**
508	Bids and Specifications submitted for projects (Unsuccessful)	1 year**
509	Bids and Specifications submitted for projects (Successful)	4 years after completion of project**
510	Contractor Files	Until project complete, if no litigation pending**
511	Preventative Maintenance reports	Fiscal year + 2 years
512	Warranties/Guarantees for property	Life/Warranty of equipment
513	Inventory Plant and Equipment	Until superseded**
514	Special Education Tutoring Reports	5 years
515	Transportation Records	2 years**
516	Field Trip forms and Volunteer Driver Forms	2 years
517	Transportation Accident Reports	3 years provided no litigation pending
518	Food Service Records <ul style="list-style-type: none"><li>• Menus</li><li>• Food Production</li><li>• Milk Sold</li><li>• Students Served</li></ul>	4 years**
519	Lunchroom Records <ul style="list-style-type: none"><li>• Cash Register Tapes</li><li>• Cashier's Daily Reports</li></ul>	4 years**
520	Inventories of food service materials	Until superseded
521	Lunchroom License	1 year after expiration



**600 FINANCIAL RECORDS**

601	Requisitions / Purchase Orders	4 years**
602	Receipts / Deposit Slips	4 years**
603	Annual Financial Reports and Records	5 years**
604	Activity Fund Cash Journal and Ledger	5 years**
605	Securities held by the Board	Permanent***
606	Investment Ledger	5 years**
607	Tax Settlements (Semi- and Annual) and Advances	5 years**
608	Bond and Coupons held by the Board	Until redeemed*
609	Accounts Payable Ledgers	5 years**
610	Accounts Receivable Ledgers	5 years**
611	Budget Work Papers	5 years**
612	Vouchers, Invoices, and Purchase Orders	5 years**
613	State Program Files	10 years**
	• Public/Private Grants	
614	Federal Program Files	10 years**
	• Title, I, II, III, IV-B, IV-C & VI-B	
	• Chapters 1 and 2	
	• Drug Free	
615	Tax Anticipation Notes	10 years**
616	State Reimbursement Settlement Sheets	5 years**
617	Employee bonds, Board Member bonds	5 years
618	Tax Apportionments (Semi-Annual)	5 years
619	Canceled Check and Bank Settlements	4 years**
620	Tuition Fees and Payments made for employees	4 years**
621	School Finance (S.F.) Monthly Statements	4 years**
622	Investment Records	4 years**
623	Travel Expense Reports	5 years**
624	State Sales Tax Reports	4 years**
625	Student Activity Fund Records	4 years**
	• Pay-ins	
	• Pay-outs	
	• Receipts/Deposits	
	• Reports	
626	Check Registers	4 years**
627	Deposit Slips / Cash Proofs	4 years**
628	Receipt Books	4 years**
629	Monthly Financial Reports	4 years**
630	Accounting Data	4 years**
631	Service Contracts	4 years**
632	State Subsidy Reports	3 years**
	• Applications for driver education, pupil transportation, special education, etc.	
633	Delivery / Packing Slips	1 year**
634	Requisitions	1 year*
635	Tax Exemption Certification of the Board	Permanent***
636	Annual Budgets	5 years**
637	Insurance Policies	5 years after expiration provided all claims settled



**700 PAYROLL RELATED**

701	Payroll Ledgers for employees	Permanent
	<ul style="list-style-type: none"> <li>• Bi-Weekly Payroll Reports</li> <li>• Quarterly Payroll Reports</li> </ul>	
702	Earnings Registers for employees	Permanent
	<ul style="list-style-type: none"> <li>• By Staff Member</li> <li>• By Calendar Year</li> </ul>	
703	Monthly Payroll Reports for employees	Permanent
	<ul style="list-style-type: none"> <li>• Leave usage and accumulation</li> <li>• Retirement service</li> </ul>	
704	Bureau of Employment Service Quarterly Reports	7 years
705	Forms W-2 and W-4 (employer copy) for employees	6 years and current**
706	Federal Income Tax (Quarterly / Annual) for employees	6 years and current**
707	Ohio Income Tax (Monthly / Annual) for employees	6 years and current**
708	City Income Tax (Monthly / Annual) for employees	6 years and current**
709	School Income Tax (Monthly / Annual) for employees	6 years and current**
710	Payroll Reports for employees	4 years**
	<ul style="list-style-type: none"> <li>• Computer-generated reports used for each payroll</li> </ul>	
711	Payroll Update Listings for employees	4 years**
712	Payroll Calculations for employees	4 years**
713	STRS / SERS Waivers	Permanent
714	SERS Reports	4 years**
715	STRS Reports	4 years**
716	Annuity Reports for employees	4 years**
717	Benefit Folders / Reports for employees	4 years**
718	Employee Request and/or Authorization for Leave Forms Sick, Vacation, Personal, or other leave	4 years**
719	Deduction Reports for employees	4 years**
720	Employee Vacation / Sick Leave Records	4 years**
721	Time Sheets for employees	6 years**
722	Overtime Authorizations for employees	6 years
723	Employee Insurance Bills	4 years**
	<ul style="list-style-type: none"> <li>• Medical</li> <li>• Dental</li> <li>• Life</li> </ul>	
724	Paycheck Register	4 years**
725	Payroll Bank Statement	4 years**
726	Deduction Authorizations for employees	Until superseded or employee terminated
727	Records of Governing Authority Stipends	4 years**
728	Records of Governing Authority Expense Reimbursements	4 years**





## **800 REPORTS**

801	State Auditor Reports	5 years
802	School Finance (S.F.) Reports – Annual	5 years
803	Special Education (S.E.) Reports – Annual	5 years
804	Vocational Education (V.E.) Reports – Annual	5 years
805	Ohio Common Core Data (OCCD) Reports	5 years
806	Driver’s Education Reports	5 years
807	Ohio Department of Education (ODE) Reports	5 years
808	Civil Rights Reports	Permanent
809	Title IX Reports	10 years
810	State Minimum Standards	10 years
811	Personnel State Reports (SF-1 and CS-1)	4 years**
812	Worker’s Compensation Wage Reports (from County Auditor)	5 years
813	Bank Balance Certification (from County Auditor)	5 years
814	Transportation Reports	4 years**

## **900 OTHER**

901	Governing Authority Directory	5 years
902	Enrollment Record (by grade and building)	Permanent
903	Building, Boiler, and Maintenance Reports for facilities	2 years*
904	Employee Handbooks	Until superseded
905	Attendance Records	Until superseded

\* After end of fiscal year

\*\* Provided the record has been audited

