

Retention, Management, and Disposal of Records

For the School to operate efficiently, the School must effectively manage its records. To accomplish this goal and to comply with Ohio law, the School has established a Record Commission.

The Records Commission shall include of the President of the Governing Authority, the Fiscal Officer, and the Head Administrator. The Records Commission shall meet at least once every twelve months. The Records Commission has the authority and the discretion to appoint records officers who shall perform the necessary work associated with the storage, retention, and disposal of records.

Schedule of Records Retention and Disposition

The Records Commission shall create and adopt a Schedule of Records Retention and Disposition ("Schedule") (Form RC-2), which classifies different types of School records and designates an appropriate retention period for each. The Schedule suggested by the Ohio Historical Society is hereby included as Form **1743.1**. The Records Commission has the authority to review and revise this Schedule as necessary.

After adopting a Schedule or revising a schedule, the Records Commission shall forward the Schedule to the Ohio Historical Society. The Records Commission shall keep a copy of the Schedule. The Schedule shall become effective upon approval by the Ohio Historical Society and the State Auditor.

Certificate of Records Disposal

Prior to disposing any School records, the members of the Records Commission, or the records officers, if any, shall submit to the records commission a Certificate of Records Disposal ("Certificate") (Form RC-3). An example of the Certificate may be found at Form **1743.2**. The submitted Certificate(s) shall list records that are eligible for disposal pursuant to the Schedule. The records commission shall meet at least once each year to review the submitted Certificates. Following approval of the Certificate(s) by the records commission, the guidelines stated below shall be adhered to.

- The records commission shall make a copy of all approved Certificates and shall maintain these copies for its records.
- The original Certificate(s) shall be forwarded to the Ohio Historical Society Network Specialist for the county in which the School is located no later than fifteen (15) days prior to the proposed disposal date. The records commission does not need to send a copy

of the Certificate(s) to the State Auditor's office. The Ohio Historical Society Network Specialist shall send a copy.

- The Records Commission shall wait at least fifteen (15) days after forwarding the Certificates to the Ohio Historical Society Network Specialist before disposing of the indicated records. During this time period, the records commission may be notified that the proposed disposal is inappropriate or that the Ohio Historical Society considers some or all of the documents to have continuing historical value and wishes, therefore, to take custody of them. The Ohio Historical Society may not review or select for its custody any of the following:
 - Records containing personally identifiable information concerning any student, without the written consent of the parent, guardian, or custodial of each such student who is less than eighteen (18) years of age, or without the written consent of each student who is eighteen (18) years of age or older.
 - Records, the release of which would, according to the "Family Educational Rights and Privacy Act of 1974," 88 Sta. 571, 20 U.S.C.A. 1232g, qualify disqualify a school or other educational institution from receiving federal funds.
- At the end of the fifteen (15) day period, any records which have not been opposed to or taken custody of may be disposed. The Fiscal Officer, serving as secretary of the records commission, shall arrange for the appropriate disposal of such documents.

E-mails and Other Correspondence

E-mails and other forms of correspondence are not considered a record. Instead, these messages should be categorized, retained, stored, and disposed of based upon the contents of each email or other form of correspondence. As suggested by the Ohio Historical Society, e-mail correspondence can be grouped into four (4) different categories:

Not an Official Record. If an e-mail or correspondence does not document the organization, functions, policies, decisions, procedures, operations, or other activities of the School, it is not considered a "record" and, therefore, may be deleted immediately. Examples of non-records include personal messages as well as publications, promotional items, and similar materials (unless it is part of a larger material that is considered a record).

Official Record of Transient Retention. If an e-mail or other correspondence serves a limited administrative value, then it shall be retained only until it no longer serves its limited administrative purpose. Examples of official records of transient retention include messages regarding upcoming meetings and messages which substitute for verbal conversation, as might otherwise occur in the hallway or on the telephone. Official records of transient retention do not discuss policy or establish guidelines.

Official Record of Intermediate Retention. Official records of intermediate retention are those records considered general or routine correspondence. Routine correspondence, includes referral letters and requests for routine information, and shall be retained for a period of six (6) months.

General correspondence, includes informative letters and memos pertaining to agency and legal interpretations, and shall be retained for a period of one (1) year.

Official Record of Long-Term Retention. Official records of long-term retention are those records which discuss policy, create rules or guidelines, or otherwise deal with significant administrative duties and responsibilities. These records shall be retained according to the Schedule as adopted by the Governing Authority.

E-Mail Storage

E-Mails may be stored in the following formats:

- on-line storage, where the e-mail is maintained in the e-mail system;
- near-line storage, where the message is stored in an electronic record-keeping system;
and
- off-line storage, where the message is physically printed and stored accordingly.

In order to assure that all necessary e-mails records are preserved, one of the following guidelines shall be adopted:

- the individual who sends the e-mail is responsible for its retention. If an e-mail is received from outside the School, any individual who receives the e-mail is responsible for its retention.
- a special mailbox is created, and each time an e-mail is sent, the sender shall send a carbon copy (cc) to said mailbox. The party charged with administering the mailbox, such as the IT department, shall retain the e-mails as necessary.

Ohio: R.C. 149.41.

Cross Reference: Policy 1741, Public Records Access Policy; Policy 1742, Internet Public Record Redaction Policy; Policy 3833, Tracking Missing Children; Policy 3831, Student Records and Release of Information; Policy 5810, Personnel Records File; Form 1743.1, Schedule of Records Retention and Disposition; Form 1743.2, Certificate of Records Disposal.

Schedule of Records Retention and Disposition

The School has adopted the forms provided by the Ohio Historical Society. The Record retention forms are available on the Ohio Historical Society's website:

<https://www.ohiohistory.org/OHC/media/OHC-Media/Learn/Archives-Library%20Documents/schoolrecordsretentionschedule.pdf>