



Book	Policy Manual
Section	800 Operations
Title	Document Management
Number	800
Status	Active
Adopted	August 24, 2016

Purpose

The Board recognizes the importance of establishing and maintaining a Document Management Policy and Plan that defines responsibilities of Intermediate Unit staff and complies with federal and state laws and regulations.

Authority

The Board shall retain, as a permanent record of the Intermediate Unit, Board 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 Intermediate Unit for a period of not less than six (6) years.[1][2]

All other Intermediate Unit documents shall be retained in accordance with state and federal law and regulations and the Document Management Policy and Plan approved by the Board.

The Intermediate Unit shall make a good faith effort to comply with all proper requests for document production. Selective destruction of documents in anticipation of litigation is forbidden.[3][4]

Definitions

Documents – any documented information, regardless of form and including electronic documents, that documents a transaction or activity of the Intermediate Unit and that is created, received or retained pursuant to applicable law or in connection with a transaction of official business or activity of the Intermediate Unit.

Document Management Plan - the system implemented by the Intermediate Unit for the retention, retrieval, and disposition of all documents generated by Intermediate Unit operations.

Document Retention Schedule - a comprehensive listing stating retention periods and proper disposition of documents.

Electronic Mail (Email) System - a system that enables users to compose, transmit, receive and manage text and/or graphic electronic messages and images across local area networks and through gateways connecting other networks. This information consists primarily of messages but may include attachments such as calendars, directories, distribution lists, word processing documents, spreadsheets, and other electronic documents.

Litigation Hold - a communication ordering that all documents and data relating to an issue being addressed by current or potential litigation or investigation be preserved for possible production during the litigation or investigation.

Delegation of Responsibility

Document Coordinator

In order to maintain a Document Management Policy and Plan that complies with federal and state laws and regulations and Board policy, the Board designates the Assistant Executive Director or his designee as the Intermediate Unit's Document Coordinator.

The Document Coordinator shall be responsible to:

- 1. Ensure that training appropriate to the user's position and level of responsibility is provided. Such training may include:**
 - a. Operation, care and handling of the equipment and software.**
 - b. Requirements of the Document Retention Schedule.**
 - c. Protocols for preserving and categorizing Intermediate Unit documents.**
 - d. Identification of what is and what is not a document.**
 - e. Disposal of documents.**
- 2. Review the Document Management Policy and Plan periodically to ensure that document descriptions and retention periods are updated as necessary.**
- 3. Identify, when the retention period expires, the specific documents to be disposed of and ensure that all identified documents are properly disposed of annually.**

Document Management Committee

A committee responsible for the development and recommendation of the Intermediate Unit's Document Management Policy and Plan shall be established by the Board. The Document Management Committee shall give primary consideration to the most efficient and economical means of implementing the recommended Policy and Plan. Members of the Committee shall include the:

1. Open Records Officer.[5]
2. **Executive Director.**
3. Board Secretary.[6]
4. **Solicitor.**
5. **Director of Technology Solutions and Services or designee.**
6. **Director of Financial Services.**
7. **Assistant Executive Director.**
8. **Assistant Director of Internal Operations.**

The Document Management Committee shall meet periodically to evaluate the effectiveness and implementation of the Document Management Policy and Plan and recommend changes as needed.

Guidelines

Document Management Plan

The Intermediate Unit's Document Management Plan shall be the principal means for the retention, retrieval, and disposition of manual and electronic documents, including emails.

The Document Management Plan shall include:

1. **Comprehensive listing of documents and data of the Intermediate Unit.**
2. **Criteria to distinguish documents of the Intermediate Unit from the supplemental personal documents of individual employees.[9][10]**
3. **System(s) of document storage and retrieval to be used, including in what form the documents will be stored, maintained, reproduced, and disposed.**
4. **Preservation measures to protect the integrity of documents and data.**

5. **Data map or flow chart detailing the sources, routes, and destinations of electronic documents.**
6. **Procedures and employee(s) designated for determining whether an item is a document.**
7. **Procedures for adding, revising or deleting documents and data, and any other details necessary to implement the Document Management Policy and Plan.**
8. **Document Retention Schedule.**
9. **Provisions for the storage and retrieval of documents in the event of an emergency or disaster.**
10. **Staff positions authorized to access Intermediate Unit documents.**
11. **Procedures to be implemented in the event of a litigation hold that immediately suspends disposition of all documents relevant to the current 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 documents are subject to the litigation hold.**
 - d. **Who will be responsible for collecting such documents and in what format the documents will be collected.**

When possible, documents and data shall be stored in their original form, including metadata, such as creation date, author, type of file, etc.

For any document not covered by the Document Retention Schedule, the Document Management Committee shall determine how long the document shall be kept and recommend any necessary revisions to the retention schedule.

The Intermediate Unit shall maintain and dispose of documents in a manner that protects any sensitive, proprietary or confidential information, or individual privacy rights, and helps conserve natural resources.

Manual Documents

Manual documents, which include all documents not stored electronically, shall be retained and disposed of in accordance with the Document Management Policy and Plan.

Manual documents shall be indexed in an organized and consistent manner, reflecting the way the documents will be retained and referenced for later retrieval.

The Intermediate Unit shall develop and maintain adequate and up-to-date documentation about each manual document system. Documentation may:

1. **List system title and responsible employee(s) or office.**
2. **Define the contents of the system, including document formats.**
3. **Determine restrictions on access and use.**

Electronic Documents

Electronic documents shall be retained and disposed of in the same manner as documents in other formats and in accordance with the Document Management Policy and Plan.

Electronic documents shall be indexed in an organized and consistent manner, reflecting the way the documents will be retained and referenced for later retrieval.

The Intermediate Unit shall develop and maintain adequate and up-to-date documentation about each electronic document system. Documentation may:

1. **List system title and responsible employee(s) or office.**
2. **Specify all technical characteristics necessary for reading or processing the documents stored on the system.**
3. **Identify all defined inputs and outputs of the system.**
4. **Define the contents of the system, including document formats and database tables.**
5. **Determine restrictions on access and use.**
6. **Describe update cycles or conditions.**

Email Documents

Email messages, in and of themselves, do not constitute documents. (Would like to add - Although Email messages are not considered document, Federal and Pennsylvania law can require the retrieval and production of Email messages. As such, Email messages will be explicitly defined in the retention procedure.) Retention and disposition of email messages depend on the function and content of the individual message.

Documents on an email system, including messages and attachments, shall be retained and disposed of in accordance with the Intermediate Unit's Document Management Policy and Plan.

Email messages and attachments that do not meet the definition of documents shall be deleted no later than ten (10) days after their usefulness has expired.

Email documents may be maintained as an electronic document.

For each email considered to be a document, the following information shall be retained:

1. **Message content.**
2. **Name of sender.**
3. **Name of recipient.**
4. **Date and time of transmission and/or receipt.**

Contractors

Documents created or maintained by contractors employed by the Board shall be retained and disposed of in accordance with the Document Management Policy and Plan.^[8]

Legal

1. 24 P.S. 518
2. 24 P.S. 914-A
3. 65 P.S. 67.901
4. Pol. 828
5. Pol. 801
6. 24 P.S. 433
8. 65 P.S. 67.506
9. 20 U.S.C. 1232g
10. 65 P.S. 67.708
- 65 P.S. 67.101 et seq
- Federal Rules of Civil Procedure
- Pol. 004
- Pol. 006
- Pol. 105.2
- Pol. 114
- Pol. 138
- Pol. 203
- Pol. 203.1
- Pol. 209
- Pol. 212

Pol. 216

Pol. 233

Pol. 314

Pol. 324

Pol. 326

Pol. 334

Pol. 601

Pol. 609

Pol. 610

Pol. 619

Pol. 702

Pol. 706

Pol. 716

Pol. 810

Pol. 810.1

Pol. 830

Pol. 912