

# GOAL Academy

## Data Retention and Destruction Policy

**Section:** C: General School Administration

**Policy Number:** C-1

**Policy Name:** Data Retention and Destruction Policy

**Approval Authority:** Board of Directors

**Responsible Executive:** Chief Information Officer

**Responsible Office:** Chief Information Officer

**Originally Issued:** 7/31/2018

**Revisions:**

**1. Policy Statement** - Records retention and management is an important component of the educational process. All education providers have a need to store and manage information on general operations, student records, and finance as part of day-to-day activities. As part of a retention scheme, classes of documents are retained on different schedules based on various criteria

**2. Reason for Policy** - This policy provides general provisions for adherence to records and retention schedules and provide a consistent GOAL Academy policy regarding retention and disposal of educational and operational records

### **3. Who Should Read This Policy**

All members of the GOAL Academy community

### **4. Related Documents**

**5. Contacts:** Chief Information Officer, Sr. Director of Compliance

## **6. POLICY**

### **GENERAL RESPONSIBILITIES**

GOAL Academy is an electronic record school, and whenever applicable/possible will maintain electronic records. GOAL Academy shall set records retention schedules to address legal, statutory, and compliance requirements as well as litigation needs, business processes, and data privacy concerns. Storage requirements shall be coordinated with the Chief Information Officer to comply with established requirements for record storage. GOAL Academy retention periods are generally determined by evaluating:

- Applicable regulatory, statutory, legal, or general state and federal compliance requirements
- Determining electronic data components collected, their purpose, and applying the appropriate retention procedure to each class of data asset
- Identifying other internal or external entities that collect, store, archive, or use GOAL Academy information and records

GOAL Academy departments shall develop procedures and documentation that implement and maintain the retention requirements as outlined in this policy. Specific procedures shall specify the retention time, archival rules, data formats, and the permissible means of storage, access, and encryption (if any).

### **RETENTION REQUIREMENTS**

The Chief Information Officer or their designee shall:

- Implement data retention and disposal guidelines limiting data storage and retention times to those that are required for legal, regulatory, and business requirements
- Ensure automatic or manual processes exist for the secure destruction of paper and electronic records when no longer needed
- Follow specific retention requirements for sensitive data as set forth by this policy
- Identify retention periods for log files and audit trails
- Define and enforce email retention requirements
- Determine procedures and personnel to handle litigation, public and individual records requests

Different types of records require varying retention periods. In addition to describing how long various types of information must be maintained, retention procedures shall specify:

- Steps used to archive information and locations where this information is stored
- The appropriate destruction of electronically stored information after the identified retention period. Such steps shall adhere to the requirements outlined in this policy
- Procedures for chain of custody and handling of electronically stored information when under litigation

In certain instances, individual departments may have unique record retention requirements outside of documented groups. These shall be documented as part of internal processes and procedures and communicated to the Chief Information Officer. Such requirements may include contractual obligations with customers or business contacts or data retention requirements to maintain business operations. In some instances, departments may need to retain electronically stored information for a historical archive. During the appropriate retention period for electronic records, archived data must be retrievable. Doing so shall require the following protocols to be in place:

- As new software and/or hardware is implemented, IT Department support staff shall ensure new systems and file formats can read legacy data. This may require that older data be converted to newer formats.
- Data that is encrypted must be retrievable. GOAL Academy shall implement key management procedures that ensure encrypted data can be decrypted when needed.

When establishing record retention periods, GOAL Academy shall rely on (in order of precedence):

- Federal guidelines, laws, and statutes
- State guidelines, recommendations, rules, and statutory requirements
- Any GOAL Academy policy and procedure enhancing existing federal and state retention periods

**AUDIT CONTROLS AND MANAGEMENT**

On-demand documented procedures and evidence of practice should be in place for this operational policy. Examples of effective organizational management, audit controls, and employee practices include:

- Documented record retention schedules and archival information of GOAL Academy enforcement
- Procedures and anecdotal evidence of data migrations to manage electronic record compatibility with newer systems
- Documented encryption and decryption strategies that allow for retrieval of archival electronic records
- Regular employee procedures and anecdotal documentation of records management and archival processes
- Direct observation of archival records organization and storage

**7. GOAL Academy Document Retention Schedule**

**Usage**

This document defines the types of data retained by the GOAL Academy Technology Department and the period of time these documents are retained. This policy is set and managed by the Chief Information Officer and is reviewed annually.

**School Records, including Board of Education Records**

Letter of Determination granting tax-exempt and/or charitable status	Permanent Retention
By Laws -	Permanent Retention
Board policies -	Permanent Retention
Resolutions -	Permanent Retention
Board meeting minutes -	Permanent Retention
Sales tax exemption documents -	
Permanent Retention	
Tax or employee identification number designation -	Permanent Retention
Annual school legal filings -	Permanent Retention

**School Financial Records**

Chart of Accounts -	Permanent Retention
Fiscal Policies and Procedures -	Permanent Retention

**Audits -**

Permanent Retention

Financial statements -

Permanent Retention

General Ledger -

Permanent Retention

Check registers/books -

7 years

Business expenses documents -

7 years

Bank deposit slips -

7 years

Cancelled checks -

7 years

Invoices -

7 years

Investment records (deposits, earnings, withdrawals) -

7 years

Property/asset inventories -

7 years

Petty cash receipts/documents -

3 years

Credit card receipts -

3 years

**Tax Records**

Annual tax filing for the organization -

Permanent Retention

Payroll registers -

Permanent Retention

Filings of fees paid to professionals -

7 years

Payroll tax withholdings -

7 years

Earnings records -

7 years

Payroll tax returns -

7 years

W-2 statements -

7 years

**Personnel Records**

Employee offer letters -

Permanent Retention

Confirmation of employment letters -

Permanent Retention

Benefits descriptions per employee -

Permanent Retention

PERA records

Permanent Retention

Employee applications and resumes -

7 years after termination

Promotions, demotions, letter of reprimand, termination -

7 years after termination

Job descriptions, performance goals -

7 years after termination

Workers' Compensation records -

5 years

Salary ranges per job description -

5 years

I-9 Forms -

5 years after termination

Time reports -

3 years after termination

**Insurance Records**

Property Insurance policy -

Permanent Retention

Directors and Officers Insurance policy -

Permanent Retention

Workers' Compensation Insurance policy -

Permanent Retention

General Liability Insurance policy -

Permanent Retention

Insurance claims applications -

Permanent Retention

Insurance disbursements / denials -

Permanent Retention

**Contracts**

All insurance contracts -	Permanent Retention
Employee contracts -	Permanent Retention
Construction contracts -	Permanent Retention
Legal correspondence -	Permanent Retention
Loan / mortgage contracts -	Permanent Retention
Leases / deeds -	Permanent Retention
Vendor contracts -	7 years
Warranties -	7 years

**Donations / Funder Records**

Grant dispersal contracts -	Permanent Retention
Donor lists -	7 years
Grant applications -	7 years
Donor acknowledgements -	7 years

**Management Plans and Procedures**

Strategic Plans -	7 years
Staffing, programs, marketing, finance, fundraising and evaluation plans -	7 years
Vendor contacts -	7 years
Disaster Recovery Plan -	7 years

**Email and Other Computer-Based Correspondence**

This is in regard to correspondence/information that is developed and/or maintained by faculty on the school's computers, whether it is in regard to work or personal information.

Employee correspondence, e.g., emails -	7 years
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**Document Protection**

Documents (hardcopy, online or other media) will be stored in a protected environment for the duration of the Document Retention Schedule. Computer backup media will be included.

**Document Destruction**

Hardcopy of documents will be destroyed by shredding or fire after they have been retained until the end of the Document Retention Schedule. Copies of computer backups will be destroyed by fire or other proven means to destroy such media after they have been retained until the end of the Document Retention Schedule.

**Provision of Documentation for Investigations or Litigation**

Documents requested and subpoenaed by legally authorized personnel will be provided within 14 business days, depending on the subject and litigation. The Board Chair and CEO will

authorize provision. No documents will be concealed, altered or destroyed with the intent to obstruct the investigation or litigation.

## **8. Enforcement**

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

