Records Management Policy 5070/7350

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1. Purpose

The purpose of this policy is to establish guidelines for the retention, maintenance, and disposition of records at ENCSD in compliance with the North Carolina Functional Schedule for 2025, North Carolina Public Records Law (N.C.G.S. 132), Family Educational Rights and Privacy Act (FERPA, 20 U.S.C. §1232g), Health Insurance Portability and Accountability Act (HIPAA, 45 CFR Parts 160 & 164), and state cybersecurity regulations. Each department is responsible for ensuring accurate record-keeping and secure management of records in accordance with state and federal regulations.

2. Scope

This policy applies to all ENCSD departments, including Academics, Administration, Nutrition, Boarding, Maintenance, Housekeeping, Business Office, Human Resources (HR), Student Health Center, School Psychologist, School Social Worker, School Speech Pathologist, ENCSD Museum, and Information Technology (IT).

3. General Records Management Guidelines

- All records must be retained according to the current North Carolina Functional Schedule, specifically:
 - Student records (academic, disciplinary, health): Retained permanently or as outlined in the schedule per NC Retention Schedule.
 - Personnel records (employment history, benefits, evaluations): Retained for 30 years after separation per N.C.G.S. 126-22.
 - Financial records (budgets, audits, payroll): Retained for 5-10 years, depending on document type, per N.C.G.S. 132-3.
 - Facility and safety records (maintenance logs, incident reports, compliance records): Retained for 5-25 years, based on regulatory requirements.
 - General correspondence and administrative reports: Retained for 3-5 years, unless deemed historically significant.

- Digital records must be stored securely with appropriate access controls,
 following NC Department of Information Technology (DIT) security guidelines.
- Physical records must be stored in designated areas with restricted access, ensuring protection from damage or unauthorized access.
- Confidential records must be handled in accordance with FERPA, HIPAA, and state privacy laws.
- Outdated records must be disposed of properly, either by shredding (physical) or secure deletion (digital) as per the functional schedule.
- Public records, including emails and text messages related to school business, are subject to disclosure under N.C.G.S. 132-1.

4. Best Practices for Record Maintenance

A. Using Logs for Record Tracking

 Departments should maintain a record log (example below) detailing the date of creation, retention period, responsible staff member, and final disposition date.

Agency:						Department/Division:							
Prepared by: Email:					Phone: Date Completed:			: Date Revised:					
Records Inventory					Retention Schedule Information				Destructions Log				
Location	Record Title	Description	Сору Туре	Inclusive Dates	Volume	Electronic Copy?	Applicable Retention Schedule	Corresponding Retention Schedule Item	Disposition Instructions	Applicable Citations	Date	Method	Authorization
Location of records	Brief reference for each record series	Description of records including their purpose and use	Are these Record, Reference, or Transitory Copies, or are you not sure?	Earliest and latest known dates	What is the amount of records?	Does an electronic copy exist?	Title of schedule used to determine disposition	Corresponding item on the applicable retention schedule		Confidentiality or other applicable legal citations	When the records were destroyed	Method of destruction	Who authorized the destruction?
_		Completed exit interviews with employees that are separating from the agency.		01/15/2001-0 5/29/2022	1 filling cabinet	No	l	4.17/ Exit Interview Records	Destroy in office after 1 year.	G.S. 115C Art. 21/	10/27/2023	Shred	John Smith

- Logs should be reviewed annually to ensure compliance with retention schedules.
- Any changes to a record's status (transfer, archive, disposal) must be documented in the log.

B. Best Practices for File Naming

- Use a consistent naming convention to improve accessibility and organization.
- Recommended format: [Department][RecordType][Date]_[UniqueIdentifier] (e.g., HR EmployeeFile 2025 JohnDoe).
- Avoid special characters and spaces in file names; use underscores instead.
- Include version numbers if multiple versions of a document exist (e.g., _v1, _v2).

C. Emails and Personal Device Usage

- Emails related to official school business are considered public records and must be archived per the NC Functional Schedule.
- Staff should use ENCSD-issued email accounts for all work-related communications; personal email accounts should not be used.
- Personal devices used for work (phones, tablets, laptops) may be subject to public records requests if they contain school-related communications per N.C.G.S. 132-1.
- If a personal device is used, all work-related communications must be forwarded to an official ENCSD account and stored appropriately.
- Avoid texting work-related information unless absolutely necessary; if used, maintain a copy of all work-related texts in an official record-keeping system.

5. Electronic Filing System

A. Setting Up the Electronic Filing System

- All records will be stored in a secure cloud-based document management system with controlled access.
- Each department will have a designated folder structure aligned with retention schedules and security policies.
- Access permissions will be granted based on role-based authorization to ensure confidentiality and compliance.
- Files will be tagged with metadata, including date of creation, retention period, and department, to facilitate easy retrieval and tracking.
- Regular data backups will be performed to prevent data loss.

B. Organizational Hierarchy for Electronic Files

- 1. ENCSD Records (Root Folder)
 - 1.1 Academics

- Student Grades
- Attendance Records
- IEPs
- Curriculum Materials
- 1.2 Administration
 - Meeting Minutes
 - Policies & Procedures
 - Accreditation Reports
- ∘ 1.3 Business Office
 - Financial Reports
 - Payroll Records
 - Budget Documents
- ∘ 1.4 Human Resources
 - Employee Records
 - Evaluations & Contracts
 - Benefits & Retirement
- 1.5 Student Health Center
 - Medical Records (HIPAA Compliant)
 - Therapy & Counseling Records
- 1.6 ENCSD Museum
 - Historical Documents
 - Exhibit Records
 - Donation Records
- 1.7 Facilities & Maintenance
 - Safety Inspections
 - Incident Reports
 - Maintenance Logs
- 1.8 Information Technology (IT)
 - System Security Logs
 - Software Licenses
 - Network Infrastructure Records
 - Equipment Inventory
 - User Access and Permissions Logs

6. ENCSD Records Maintenance Procedure

To Be Conducted Every January and June

1. Review of Active Records

- Each department reviews all active records and updates status (retained, archived, or scheduled for disposal).
- Ensure all records are logged in the department record log with proper tracking information.

2. Audit Electronic Filing System

- Verify that all digital records are properly named and filed according to ENCSD's naming conventions.
- Remove duplicate or outdated versions of documents unless retention policies require them to be kept.
- Check access permissions and update as needed for staff changes.

3. Physical Records Review

- Confirm that all paper records are stored in appropriate locations (secure cabinets, designated archive areas).
- Check for signs of damage, unauthorized access, or missing files.
- Label and organize records for easy retrieval.

4. Update Compliance Logs

- Verify and update record logs to reflect changes in document status.
- Ensure all necessary communications and transactions related to records are documented.

5. Prepare for Disposal or Archiving

- Identify records that have met retention schedules and are due for disposal.
- Follow secure shredding procedures for physical records.
- o Digitally delete expired electronic records using secure deletion methods.
- o Ensure that historically significant records are properly archived.

6. Training & Reminders

- Conduct a brief department meeting to remind staff of proper record management procedures.
- o Address any common mistakes or issues observed during the audit.
- o Provide updated guidance on compliance expectations.

7. Report to ENCSD Records Management Office

- o Submit an updated records status report for department review.
- o Address any issues with non-compliance or missing records.
- Schedule any needed follow-up training or corrective actions.

Records Compliance Checklist

For Departmental Use - Ensuring Compliance with ENCSD's Records Management Policy

Instructions

Each department must complete this checklist to ensure their records align with ENCSD's Records Management Policy & Procedures.

This process will help bring existing records into compliance with the current North Carolina Functional Schedule.

General Compliance Tasks (All Departments)
General Comphance rasks (An Departments)
Review Functional Schedule
Ensure all staff understand record retention, storage, and disposal guidelines
Confirm compliance with FERPA, HIPPA, and NC Public Record Laws.
Audit Physical & Digital Records
Identify and document all existing records in the department
Verify that records are stored in designated filing systems
Ensure confidential records are stored securely with restricted access
Update & Standardize Record Naming and Organization
Rename files using ENCSD's standard naming conventions DEPARTMENT_FileName_Yea
HR_EmployeeFile_2025_JohnDoe
Organize electronic records into the department's designated folders
Archive historical or inactive records as per NC Functional Schedule
Verify Retention & Disposal Schedules
Cross-Check records against the retention schedule to determine what to keep, archive,

Document records eligible for disposal and prepare them for secure shredding or deletion

Confirm historically significant records are archived properly

36	curely Handle Emails & Personal Devices			
	Ensure work-related emails are stored in official ENCSD accounts			
	Move critical email records to designated department folders			
	Inform staff that work-related content on personal devices is a public record and must be			
Confirm Department Staff Roles & Responsibilities				
Co	nfirm Department Staff Roles & Responsibilities			
Co	nfirm Department Staff Roles & Responsibilities Assign a Records Compliance Contact Person within the department			
Co	· ·			
	Inform staff that work-related content on personal devices is a public record and mus			

ca	demics
	Ensure all cumulative folders are complete and in order
	Ensure all student records are stored and retained properly
	Move outdated student records to archival storage or disposal per Functional Schedule a Management policy
	Secure confidential records in compliance with FERPA
dn	ninistration
	Organize meeting minutes, policies and administrative reports
,	Verify retention schedules for policy updates and accreditation reports
	Archive important historical documents for institutional memory

Bu	siness Office
	Verify retention of budget reports, payroll records, and financial audits
	Securely dispose of outdated financial documents
	Ensure records of purchases and transactions comply with state audit requirements
Hu	man Resources
	Ensure employee files, contracts, and benefits records follow retention policies
	Securely store confidential personnel evaluations and disciplinary actions
	Verify that separated employees' files are maintained for 30 years post-separation

rition Services
Maintain meal program records and compliance reports
Secure health and allergy-related records for students and staff
Dispose of expired inventory and financial reports per retention guidelines
arding Program
Organize student housing records and incident reports
Ensure compliance with behavior documentation and safety protocols
Archive or securely dispose of records per retention schedules
intenance & Housekeeping
Review maintenance logs, safety inspections, and work orders
Store compliance reports related to building codes and OSHA requirements
Dispose of outdated non-essential maintenance records
dent Health Center, School Psychologist, Social Worker, Speech Pathologist
Ensure medical, counseling, and therapy records are secured per HIPAA & FERPA
Archive older health records based on student age and retention policies
Properly dispose of expired medical supply records and outdated reports
CCD Management
CSD Museum
Verify and catalog historical records, artifacts, and donation records
Maintain detailed logs for exhibits and conservation reports
Ensure proper archival storage and digitization of significant materials
ormation Technology (IT)
Ensure system security logs, software licenses, and network records are retained per gui
Secure access logs for user permission and IT compliance
Review and update cybersecurity and backup procedures

Final Review & Reporting

Department Head Review

Verify that all checklist items have been completed

	Any outstanding compliance issues or gaps have been addressed
Sub	omit Compliance Report
	Provide this form update to the Executive Assistant
	Schedule follow-up training or corrective actions if necessary

Completion Date:	
Reviewed by (Department Head):	
Submitted to (Records Management Office):	

Appendix

Definitions

- 1. **North Carolina Functional Schedule** The North Carolina Functional Schedule for Local and State Agencies is a standardized records retention and disposition schedule that outlines how long various types of records must be retained by public agencies, including schools. It replaces previous schedules that categorize records by department and instead organizes them based on function (e.g., student records, financial records, personnel records). This schedule ensures compliance with North Carolina Public Records Law (N.C.G.S. 132) and other applicable state and federal laws.
- 2. **North Carolina Public Records Law** (N.C.G.S. 132) This law defines public records as all documents, emails, photographs, recordings, or other materials created or received by a public agency in the course of business. It mandates that these records be maintained, retained, and made accessible to the public unless exempted by law (e.g., FERPA for student records, HIPAA for health records). This law also dictates the proper disposal of public records, which requires authorization from the NC Department of Natural and Cultural Resources (DNCR) before destruction.
 - **FERPA (Family Educational Rights and Privacy Act)** A federal law that protects the privacy of student educational records and grants parents and eligible students' rights regarding access to those records.
 - **HIPAA** (**Health Insurance Portability and Accountability Act**) A federal law that establishes standards for protecting sensitive patient health information, including records maintained by the Student Health Center.

- 3. **Reference Copy** A non-official copy of a document that is kept for informational purposes only. Reference copies do not serve as the official record and should not be retained beyond their immediate use. These copies are not subject to retention requirements and can be discarded when no longer needed.
- 4. **Transitory Copy** A temporary record that has short-term administrative value but does not need to be retained for legal, historical, or operational reasons. Examples include drafts, routine emails, meeting reminders, and duplicate copies. These records can be deleted or discarded when no longer needed, as they are not considered part of the agency's permanent records.
- 5. **Record Copy** (Official Copy) The primary or official version of a record that must be retained according to the NC Functional Schedule. The record copy is legally required to be maintained and is subject to public records law, audit requirements, and disposal regulations. Each department is responsible for maintaining the record copy of documents within their function.
- 6. **Retention Schedule** A document that specifies how long records must be kept before they can be destroyed or archived. The North Carolina Functional Schedule serves as the official retention schedule for public agencies in the state. Retention periods vary based on legal, historical, and operational needs, and records cannot be destroyed before their required retention period has expired.
- 7. **Transfer of Records** The process of moving records from one storage location to another. This may include:
 - Internal Transfer Moving records between ENCSD departments for continued use.
 - Archival Transfer Sending records to the NC State Archives if they have historical significance.
 - Off-Site Storage Transfer Moving records to a secure external storage facility for retention before disposal.
- 8. **Archiving Records** The process of preserving records of historical, administrative, or legal significance beyond their active use period. Archived records are permanently retained and stored in a designated archival repository, such as the NC State Archives or an ENCSD digital archive. Examples of archived records include historical student records, accreditation documents, and institutional policies.

- 9. **Disposal of Records** (Acceptable Methods) The proper destruction of records that have met their retention period, in compliance with NC public records laws. Acceptable methods include:
 - Physical Records:
 - Shredding Required for confidential or personally identifiable information (PII).
 - Recycling Allowed for non-confidential paper records.
 - Incineration Permitted for highly sensitive documents when shredding is not feasible.
 - Digital Records:
 - Secure Deletion Using data-wiping software to permanently remove electronic records.
 - Overwriting Replacing existing data with random information to prevent recovery.
 - Physical Destruction of Storage Media Destroying hard drives, USBs, and CDs when necessary.
- 10. **Organizational Hierarchy for Electronic Files** A structured system for organizing digital records within an electronic filing system to ensure consistency, accessibility, and compliance with the NC Functional Schedule. Best practices include:
 - Root Folder: ENCSD Records
 - Subfolders by Function (not department) (e.g., Financial Records, Student Records, HR Records)
 - Subcategories by Record Type (e.g., Payroll, Budget Reports, Employee Evaluations)
 - File Naming Conventions (e.g., HR_EmployeeFile_2025_JohnDoe to ensure clarity and retrieval efficiency)
 - Access Controls: Restricting file permissions to authorized personnel based on role and security requirements.
 - Metadata Tagging: Adding dates, retention periods, and department identifiers to facilitate record retrieval.

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