Osprey Wilds' Policy 723
Online and In-Person School's Policy
Adopted: September 28, 2026 Required Osprey Wilds, Three-Year Review

723 RECORDS RETENTION AND DESTRUCTION

MN Statutes 15.17; 138.17; Chapter 13

I.PURPOSE

The purpose of this policy is to establish how Crosslake Community Schools (CCS) keeps, manages, and disposes of its records, in any format, so that records are kept as long as the law requires, protected while they are kept, and destroyed only when and how the law allows.

II.DEFINITIONS

A.**"Records"** means all cards, correspondence, discs, maps, memoranda, microfilms, papers, photographs, recordings, reports, tapes, writings, and other data, information, or documentary material, regardless of physical form or characteristics, storage media, or conditions of use, made or received by CCS in connection with the transaction of public business, including electronic records and email.

B.**"Retention Schedule"** means the General Records Retention Schedule for Minnesota School Districts, as adopted by the school board and as updated by the Minnesota Records Disposition Panel, together with any CCS-specific retention periods approved under Section IV.

C.**"Legal Hold"** means a written directive suspending the destruction of records that relate to actual or reasonably anticipated litigation, claims, audits, investigations, or pending data requests.

D.**"Records Management Officer"** means the employee designated by the District Superintendent under Section V.C. to coordinate CCS's records management program.

III.GENERAL STATEMENT OF POLICY

A.CCS shall make and keep records necessary to a full and accurate knowledge of its official activities.

B.Records created or received by CCS employees, school board members, contractors, or volunteers in the course of CCS business belong to CCS, regardless of where they are stored, including in personal email accounts, text messages, or personal devices.

C.No CCS record may be destroyed, discarded, or transferred except as provided in the Retention Schedule and this policy. Retention periods in the Retention Schedule are minimums; CCS may keep a record longer when there is a business, legal, or historical reason to do so.

D.Records are maintained, protected, and disposed of in compliance with the Minnesota Government Data Practices Act, the Family Educational Rights and Privacy Act, and other applicable law, and consistent with CCS Policy 515 (Protection and Privacy of Pupil Records) and Policy 722 (Public Data and Data Subject Requests).

IV.RETENTION SCHEDULE

A.By board resolution, CCS adopts the General Records Retention Schedule for Minnesota School Districts in its entirety as CCS's Retention Schedule. The Records Management Officer shall

submit the Notification of Adoption form to the Minnesota State Archives (Minnesota Historical Society) and keep the signed, returned copy on file.

B. When the Minnesota Records Disposition Panel updates the general schedule, CCS will follow the most current version without further board action.

C. If CCS keeps a type of record not listed on the Retention Schedule, that record may not be destroyed until the Records Management Officer obtains approval of a retention period or one-time disposal authority from the Minnesota Records Disposition Panel.

D. This policy and the adopted Retention Schedule shall be posted on the CCS website and made available to staff.

V. RESPONSIBILITIES

A. School Board. The school board adopts this policy and the Retention Schedule.

B. District Superintendent. The District Superintendent serves as CCS's Responsible Authority under Policy 722, oversees implementation of this policy, issues and releases Legal Holds, and approves the destruction of records.

C. Records Management Officer. The District Superintendent shall designate a Records Management Officer in writing. The Records Management Officer coordinates the records management program, maintains the Retention Schedule and the Records Destruction Log (723 FRM), provides guidance and annual reminders to staff, and serves as the contact for the Minnesota State Archives.

D. Principals and Department Leaders. Principals and department leaders ensure that records in their schools or departments are kept, stored securely, and scheduled for disposal in accordance with this policy.

E. All Staff. All staff shall keep CCS records in CCS systems, follow the Retention Schedule, and comply with Legal Holds.

VI. LEGAL HOLDS

A. When CCS knows of, or reasonably anticipates, litigation, a claim, an administrative proceeding, an audit, an investigation, or a pending data request, the District Superintendent or designee shall issue a Legal Hold to the staff who hold relevant records.

B. Records under a Legal Hold may not be destroyed, altered, or deleted, even if their retention period has ended, until the District Superintendent releases the hold in writing.

VII. DESTRUCTION OF RECORDS

A. Records may be destroyed only after their retention period has ended, no Legal Hold applies, and destruction has been approved by the Records Management Officer and the District Superintendent on the Records Destruction Log (723 FRM).

B. Records containing data that is not public, including private or confidential data on individuals and educational records, shall be destroyed in a manner that prevents their contents from being determined, such as cross-cut shredding, pulping, or incineration for paper records, and secure deletion or physical destruction for electronic media.

C. Before any computer, Chromebook, storage device, copier, or other equipment that has stored CCS records is surplused, recycled, returned, or discarded, it shall be securely wiped or its storage destroyed, consistent with CCS Policy 802 (Disposition of Obsolete Equipment and Material).

D. Records of lasting historical value may be offered to the Minnesota State Archives in place of destruction, as provided in the Retention Schedule.

E. The Records Destruction Log shall be kept permanently.

VIII. SPECIFIC RECORD TYPES

A. Student Records. Student records are kept and disposed of in accordance with the Retention Schedule, the Family Educational Rights and Privacy Act, and Minn. Stat. § 13.32. Permanent student records, including transcripts, are kept permanently. Student health records are maintained as required by Minn. Stat. § 121A.15 and § 144.29.

B. Special Education Records. CCS shall inform parents, or an adult student, when personally identifiable special education information is no longer needed to provide educational services, and shall destroy that information at the parent's or adult student's request. CCS may keep, without time limit, a permanent record of the student's name, address, phone number, grades, attendance record, classes attended, grade level completed, and year completed.

C. Federal Grant Records. Financial and program records for federal awards are kept for at least three years from the date the final expenditure report is submitted, or longer if required by the Retention Schedule, the awarding agency, an audit, or a Legal Hold.

D. Electronic Records and System Changes. Electronic records, including email and records in CCS's student information, learning management, finance, and special education systems, are subject to the same retention periods as paper records. When CCS changes systems, records in the prior system are migrated or preserved in a readable form for the remainder of their retention period.

E. Charter Closure or Nonrenewal. If CCS ceases operation, its records shall be transferred, preserved, or disposed of as required by the charter contract, the Minnesota Department of Education, and applicable law.

IX. TRAINING AND REVIEW

A. Staff shall receive notice of this policy upon hire and an annual reminder of their records responsibilities.

B. This policy shall be reviewed at least every three years.

Legal References: Minn. Stat. § 15.17 (Official Records)
Minn. Stat. § 138.17 (Government Records; Administration)
Minn. Stat. Ch. 13 (Minnesota Government Data Practices Act)
Minn. Stat. § 13.32 (Educational Data)
Minn. Stat. § 121A.15 (Health Standards; Immunizations)
Minn. Stat. § 144.29 (Health Records; Children of School Age)
20 U.S.C. § 1232g (Family Educational Rights and Privacy Act)
34 C.F.R. Part 99 (Family Educational Rights and Privacy)
34 C.F.R. § 300.624 (Destruction of Information)
2 C.F.R. § 200.334 (Record Retention Requirements)

Cross References: CCS Policy 406 (Public and Private Personnel Data)
CCS Policy 515 (Protection and Privacy of Pupil Records)
CCS Policy 722 (Public Data and Data Subject Requests)
CCS Policy 750 (Data Subject Rights and Access Policy)
CCS Policy 802 (Disposition of Obsolete Equipment and Material)

General Records Retention Schedule for Minnesota School Districts