

Lakeland Joint School District #272

Sierra Schrader, Clerk of the Board

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One District. One Mission. Every Student. Every Day.

Board Agenda Item **Request**

AGENDA ITEM: Custodian of Records Handbook

PURPOSE: Present Revised Handbook

MEETING DATE: 9/17/25

PREPARED BY: Sierra Schrader

INFORMATIONAL SUMMARY: I have created a Custodian of Records Handbook for the Board's Consideration.

FINANCIAL CONSIDERATION: None

SUPERINTENDENT RECOMMENDATION: I am recommending to approve the Custodian of Records Handbook as presented.



Custodian of Records Records Request Handbook

2025

**Lakeland Joint School District
No. 272
15506 N Washington St.
Rathdrum ID 83854**

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Section 1: Records Management

1.1 Classification & Retention

- Categorize records as Active (in regular use), Inactive (occasional reference), or Archival (historical preservation).
- Apply retention schedules according to district policy and Idaho Code:
 - Board minutes: Permanent
 - Policies and regulations: Permanent
 - Contracts and leases: 7 years after expiration
 - Election materials: 5 years' post-election
 - Emails and transitory documents: 1 year unless tied to a legal matter

Retention Codes			
AC—After closed, terminated, completed, expired, settled, or last date of contact FE—Fiscal Year End (June 30th) LA—Life of Asset PM—Permanent		US—Until Superseded DO – District Office SB – School Buildings DM- District Maintenance DT–District Transportation	
1. Administration	Record Description	Retention Period	Location
	Agendas, Attendance Summary, Board Records, Minutes, Reports	PM	DO, SB
	Ballots (General & Bond)	≥8 Months / ≥60 Days	DO
	Board Member Records, Program Review	AC+3 yrs	DO, SB
	Contracts & Leases	AC+6 yrs	DO
	Donations, Organization Chart, Press Releases	PM	DO, SB, DM, DT
	Enrollment & General Admin	3 yrs	DO, SB

2. Fiscal Records	Record Description	Retention Period	Location
	AP/AR, Appropriations, Bank Statements, Bid Documentation, Cancelled Checks, Cash, Chart of Accounts, Expenditures, External Reports, General Ledger, Operating Budgets, Purchasing, Receipts, Reconciliations, Reimbursable	FE+3 yrs	DO, SB, DM, DT
	Grants, Insurance Claims, Returned Checks, USDA	AC+3 yrs	DO, SB
	Insurance Policies	AC+5 yrs	DO
	Long-Term Liabilities, Tax Records	AC+4 yrs	DO
	Title I Ch.2, Title VI-B	FE+5 yrs	DO
	Signature Authorizations	US+FE+3 yrs	DO
	Capital Assets	LA+3 yrs	DO, SB, DM, DT
	Annual Reports, Deeds, Easements, Final Audits, Legal Advice, Litigation, Performance Bonds, Retention Schedules	PM	DO, SB, DM, DT
3. Volunteer Records	Record Description	Retention Period	Location
	All Volunteer Records	AC+3yr	DO SB

4. Personnel Records	Record Description	Retention Period	Location
	Adjustments, Leave Requests, Sick Leave Pool, Status	FE+3 yrs	DO, SB, DM, DT
	Applications (Hired), W2, W4	AC+5 yrs / 5 yrs	DO, SB, DM, DT
	Applications (Not Hired), Corrective Action, Counseling, Criminal History, Deduction Authorizations, Disciplinary Action, Employee Statements, Grievance, Recognition, Training, Unemployment Compensation	AC+1–6 yrs	DO, SB, DM, DT
	Benefit Plans, Direct Deposit, Driving Record, Employee Benefits, Insurance, License	US / US+1 yr	DO, DT
	Earnings, Income Adjustments, Time Sheets, Unemployment Claims	3–4 yrs	DO, SB, DM, DT
	PERSI Enrollment/Termination	6 yrs	DO
	Announcements, Procedure Descriptions, Selection Records	US+3 yrs / 2 yrs	DO, SB, DM, DT
	Contracts, Former Employee Verification	Original Hire Date +50 yrs	DO
	Liability Releases, Overtime, Performance Appraisals, Personnel Info, Policy Manuals	PM	DO, SB, DM, DT
	Resume (Unsolicited)	1 yr	DO, SB, DM, DT
	Workers' Compensation	AC+10 yrs	DO
	Eligibility	AC+4 yrs	DO
	Record Description	Retention Period	Location
5. Student Records.	Education	PM	DO SB
	Special Education	FE+6yr	DO SB
	Medicaid	FE+5yr	DO SB

6. Facilities & Equipment	Record Description	Retention Period	Location
	History Files, Manuals	LA (+3 yrs for History Files)	DO, DM, DT
	Plans & Specs	A. PM B. AC+2 yrs	DO, DM, DT
	Appraisals	3 yrs	DO
	Disposal, Sales	PM	DO, DM
	Utility Usage	1 yr	DO, DM
	Property Logs	US+3 yrs	DO, SB, DM
7. Safety & Compliance Includes.	Record Description	Retention Period	Location
	Access Records, Damage, Fire Orders, Lost/Stolen Reports	FE+3 yrs / AC+2 yrs	DO, SB, DM, DT
	Accidents	8 yrs	DO, SB, DM, DT
	Disaster Preparedness, Evacuation Plans, Hazardous Material Disposal	PM	DO, SB, DM, DT
	Chemical Lists, SMDS	30 yrs	DO, SB, DM
	Incidents	3 yrs (or 30 yrs*)	DO, SB, DM, DT
	Inspections	LA	DO, SB, DM
8. Technology & Systems	Record Description	Retention Period	Location
	Backups	US or 1yr	DO
9. Transportation & Vehicles	Record Description	Retention Period	Location
	Operation Logs, Registration	1yr	DO DT
	Inspection, Repair	LA+1yr	DO DT

1.2 Filing Systems & Indexing

- Maintain dual systems:
 - Electronic Document Management System (EDMS) with metadata tags (date, document type, keywords).
 - Physical filing cabinets organized by folder code and indexed in a master log.
- Conduct quarterly audits to verify proper labeling, folder completeness, and secure storage of sensitive files.

1.3 Record Disposal & Destruction

- Generate a list of eligible records for destruction.
- Secure Board and/or Superintendent approval for disposal lists, then execute a certificate of destruction.
- Utilize locked shredders or bonded destruction services for confidential materials.

Section 2: Public Records Procedures

2.1 Request Intake & Triage

1. Submission
 - Require written requests via district form or email to clerk@lakeland272.org.
 - Collect the requester's name, mailing/email address, telephone number, description of records sought, and date range.
2. Acknowledgment
 - Send an automated confirmation within one business day.
3. Scope Assessment
 - Review for clarity, suggest refinements, and estimate complexity (volume, redactions, conversion).

2.2 Response Workflow & Timeline

Day 1–3: Acknowledge or deny request. If denied, cite statutory authority, inform of appeal rights, and note consultation with counsel.



Day 4–10: Locate, retrieve, and separate exempt from non-exempt material (per I.C. § 74-112).



Day 10: Complete production or provide a status update with a firm delivery date.



Day 11+: Deliver records by mail, email, or in-office.

2.3 Fee Calculation & Collection

Service	Charge
First 100 pages	No fee
Copies beyond 100 pages	\$0.14 per page
Labor beyond 2 hours	Hourly rate of lowest-paid qualified employee
Attorney review/redactions	Hourly rate of lowest-paid district attorney
Electronic media (CD/DVD/USB)	Cost of media + conversion

Issue an itemized invoice; require advance payment before work continues.

- ★ Consider fee waivers if the request meets criteria for public interest and financial hardship.

2.4 Denial & Appeal Process

- Provide written denial notices referencing the exact code section for each exemption.
- Specify how to appeal to the Superintendent or Board, including timelines.
- Retain all responsive materials until any appeal is resolved.

Section 3: Legal Compliance

3.1 Core Statutes & Regulations

- Idaho Code [§ 33-508](#), Powers and duties of the Clerk
- Idaho Code [§ 74-101 through § 74-127](#): Public Records Act definitions, access rights, exemptions, enforcement
- Family Educational Rights and Privacy Act ([FERPA](#)): Student record confidentiality
- [Idaho Public Records Law Manual](#)

3.2 Exemptions Summary

- Personnel and applicant records ([I.C. § 74-106](#))
- Law enforcement, investigatory, and security plans ([I.C. § 74-105](#))
- Trade secrets and proprietary procurement data ([I.C. § 74-107](#))

3.3 Enforcement & Penalties

- Failure to respond within 10 working days constitutes denial, opening the door to district court petitions.
- Courts may impose civil penalties (up to \$1,200) against officials for bad-faith refusals or unlawful distribution of mailing lists.
- Good faith reliance on attorney advice constitutes statutory immunity for custodians.

Section 4: Redaction Protocols

Pursuant to Idaho Code [§ 74-101 through 74-127](#)

4.1 Purpose

To ensure the district fulfills public records requests in compliance with Idaho law while protecting sensitive information from unauthorized disclosure.

4.2 Applicability

These protocols apply to all district personnel responsible for reviewing, processing, and releasing public records, including both physical and electronic formats.

4.3 Categories of Information Subject to Redaction

The following categories must be redacted prior to disclosure unless otherwise required by law or court order: pursuant to [I.C. § 74-106](#)

Information Type	Redaction Standard
Social Security Numbers	Redact all numbers
Dates of Birth	Display only year (e.g., XX/XX/1900)
Names of Minor Children	Use initials only (e.g., A.B.)
Financial Account Numbers	Display only last four digits (e.g., XXXXX6789)
Driver's License / ID Numbers	Display only last four digits (e.g., XXXXX123A)
Employer/Taxpayer ID Numbers	Display only last four digits (e.g., XXXXX1234)
Student Records (FERPA)	Redact all personally identifiable information unless written consent is provided
Personnel Records	Redact medical information, evaluations, and disciplinary records unless disclosure is legally authorized
Medical Records (HIPAA)	Redact all protected health information unless authorized
Investigative or Legal Records	Redact if disclosure would interfere with proceedings or violate confidentiality

4.4 Redaction Workflow

1. Initial Review
 - Identify responsive records.
 - Flag documents containing sensitive or exempt information.
2. Legal Basis Determination
 - Reference Idaho Code exemptions ([§ 74-103 to 74-107](#)).
 - Consult district legal counsel for ambiguous cases.
3. Execution of Redaction
 - Use permanent redaction tools (digital or physical).
 - Ensure redacted content cannot be restored or viewed.
4. Documentation
 - Maintain a redaction log including:

- Request ID
- Record type
- Redacted fields
- Statutory basis

5. Notification

- If redaction affects third-party rights, notify affected individuals when feasible.

4.5 Quality Assurance

- Peer or supervisor review is required prior to release.
- Confirm redactions are complete, consistent, and legally justified.

Section 5: Policy Reference

5.1 Governance & Board Operations

- Clerk ([Policy 1220](#))
- Authorization of Signatures and Electronic Signatures ([Policy 1260](#))
- District Policy ([Policy 1300](#))
- School Board Use of Electronic Mail and Social Media ([Policy 1405](#))

5.2 Public Records & Requests

- Records Available to Public ([Policy 1530](#))
- Records Available to the Public ([Policy 4260](#))
- District Record Request Form ([Policy 4260F](#))

5.3 Student Records & Privacy

- Student Records ([Policy 3570](#))
- Notification to Parents and Students of Rights Concerning a Student's School Records ([Policy 3570F](#))
- Maintenance of School Student Records ([Policy 3570P](#))
- Student Data Privacy and Security ([Policy 3575](#))
- Records of Missing Children ([Policy 3610](#))

5.4 Personnel Records & Communication

- Employee Electronic Mail and On-Line Services Usage ([Policy 5330](#))
- Personnel Files ([Policy 5500](#))

- Procedures for Releasing Personnel Records to Hiring School Districts ([Policy 5500P](#))

5.5 Records Management & Retention

- Records Management ([Policy 8600](#))
- Retention of District Records ([Policy 8605](#))
- HIPAA ([Policy 8610](#))
- Security ([Policy 9500](#))

Section 6: Best Practices

- Maintain a centralized log of every public records request with status updates and fee invoices.
- Conduct annual training for all administrative staff on open meetings and public records laws.
- Establish an on-call roster so that an alternate custodian can respond during absences or emergencies.

Appendices

A. Glossary of Terms

- **Archival:** Records preserved permanently for historical or legal value
- **Custodian:** Individual responsible for public records maintenance and access.
- **Exempt Material:** Information protected from disclosure by statute.
- **FERPA:** Federal law protecting student education records
- **HIPAA:** Federal law protecting health information
- **Metadata:** Data about data—used in digital records systems
- **Open Meeting:** A gathering of a quorum of the Board to discuss public business.
- **Quorum:** A majority of board members required to conduct official business.
- **Redaction:** The act of obscuring exempt information before disclosure.

B. Templates

B.1 Records Request Form

Lakeland Jt. School District No. 272

COMMUNITY RELATIONS 4260F

District Record Request Form

Request for Public Records

I request: ☐ to examine ☐ to copy ☐ to receive an electronic copy of the following records:
(please be as specific as possible)

Requester's Name (Please Print)

Mailing Address:

Daytime Phone Number

Date of Request

4260F - Community Relations District Record Request Form Page 1 of 2

Received By: _____

Date Received: _____

Public Agency: Lakeland Joint School District No. 272

_____ Initial if Applicable: More than three working days are needed to locate or retrieve the requested records. A response shall be provided within ten working days of the request.

Cost for _____ copies at 14¢ per single-sided page.

Amount Received: _____

Cost for _____ labor at the rate of _____ per hour.

Amount Received: _____

Cost for _____, attorney fees (attorney name: _____) for redacting.

Amount Received: _____

Cost for _____ additional and necessary expenses.

Amount Received: _____

Receipt Number: _____

I HAVE READ AND UNDERSTAND THE CHARGES WHICH MAY BE ASSOCIATED
WITH MY REQUEST.

Signature

B.2. Records Request Response

Lakeland Joint School District #272

15506 N. Washington Street,
Rathdrum, Idaho 83858
208-687-0431
web.lakeland272.org



LJSD Vision: A community committed to academic excellence ... dedicated to student success.

Date

Requestor Name
Requestor Email

Mr. Doe:

I am in receipt of a request for records dated XX XX, XXXX. Below are responses to the records request made in that email communication.

“COPY OF REQUEST .”

1. Please see the documentation below in response to your request.

Thank you,

Your Name
Custodian of Records
email@email.com

B.3. More Than 3 Day Response Time Template

Lakeland Joint School District #272

15506 N. Washington Street,
Rathdrum, Idaho 83858
208-687-0431
web.lakeland272.org



LJSD Vision: A community committed to academic excellence ... dedicated to student success.

Date

Requestor Name
Requestor Email

Mr. Doe,

This letter is in response to your public records request for:

"COPY OF REQUEST".

The purpose of this letter is to inform you that your request will take more than three full business days to process.

The LJSD IT department is working tirelessly to fulfill your request.

I will promptly inform you of any alternate ways your request can be fulfilled, if not sent electronically.

Thank you for your patience, and if you have further questions feel free to contact me

Your Name
Custodian of Records
email@email.com

B.3. Request Denial Template

Lakeland Joint School District #272

15506 N. Washington Street,
Rathdrum, Idaho 83858
208-687-0431
web.lakeland272.org



LJSD Vision: A community committed to academic excellence ... dedicated to student success.

Date

Requestor Name
Requestor Email

Mr. Doe,

This letter is in response to your public records request for:

“COPY OF REQUEST”.

The purpose of this letter is to inform you that your request cannot be processed due to:

1. REASON
2. REASON
3. REASON

If you would like a copy of “REQUEST”, you will need to:

1. SOLUTION
2. SOLUTION
3. SOLUTION

Thank you for your patience, and if you have further questions feel free to contact me.

Thank you,

Your Name
Custodian of Records
email@email.com

C. Redaction Checklist

Before Redacting:

- ☐ Review the record for personally identifiable information (PII)
- ☐ Cross-check exemptions under Idaho Code § 74-105
- ☐ Confirm FERPA/HIPAA applicability

Common Items to Redact:

- ☐ Social Security Numbers
- ☐ Birthdates
- ☐ Student names and ID numbers
- ☐ Medical or counseling notes
- ☐ Home addresses and phone numbers (unless directory info)

During Redaction:

- ☐ Use consistent redaction software or method
- ☐ Log each redaction in the Redaction Log
- ☐ Note statutory basis for each redaction

After Redaction:

- ☐ Conduct quality assurance review
- ☐ Save both redacted and original versions securely
- ☐ Notify third parties if their records are affected

D. Records Retention Schedule (Excerpt)

Record Type	Retention Period	Disposal Method
Board minutes	Permanent	N/A
Policy manuals	Permanent	Archive
Contracts	7 years after end	Shred
Election materials	5 years after date	Shred
Financial reports	7 years	Shred

E. Retention Code Legend

Code	Meaning	Example Use Case
AC	After Closure	Student discipline files
FE	Fiscal Year End	Budget reports, purchase orders
LA	Life of Asset	Equipment inventory
PM	Permanent	Board minutes, policies
US	Until Superseded	Handbooks, procedural guides