

CAROLINAS COLLEGE OF HEALTH SCIENCES POLICY AND PROCEDURE

Section II – Academic/Student

SUBJECT: COLLEGE RECORDS - PRIVACY, RETENTION, AND STORAGE

REVIEWERS: Dean of Student Affairs and Enrollment Management*
Dean of Administrative and Financial Services
Provost

RELATED DOCUMENTS/POLICIES TO CONSULT:

CHS Policy: [HR 5.06 Personnel Records](#)

CCHS Policies: [Computerized Data Backup & Recovery \(Sec. I\)](#)
[Personnel Records \(Sec. IV\)](#)

Department of Education's FERPA regulations at 34 C.F.R. §99.30, §99.31 (exceptions), at <http://www.ed.gov/policy/gen/guid/fpco/index.html>.

I. POLICY

The College will provide assurance of privacy, protection, and accessibility of all student records including those enrolled in distance education programs by complying with the Family Educational Rights and Privacy Act (FERPA) and with various regulatory and agency guidelines for the retention and protection of student records. The student's academic file, maintained by the registrar, is considered the official student record and is maintained and retained as described in the procedure. Other student files maintained by the College include the student program file and the student financial file. Procedures vary with each type of file and are described in separate sections below. Except where otherwise noted the procedure refers to the academic file.

The College will provide privacy, protection, and accessibility of personnel files and will safeguard and store college historical documents and publications.

II. PROCEDURE

A. Privacy of and Access to Academic and Financial Records

1. Student files are kept in locked, fire-proof areas with limited access. Staff granted access are trained regarding the policies governing the handling and storage of student records. Directory information including name, address, telephone number, e-mail address, date of birth, photograph, dates of attendance, degrees, honors and awards received, and participation in college activities may be disclosed without the expressed consent of the student. Students may request nondisclosure of directory information by completing a form available from the registrar. Requests for nondisclosure are valid for one year.

The College will not release information other than that identified as directory information without written student consent. Further, the College will not disclose directory information that is linked to non-directory information, such as information on a student's financial aid status. For instance, if the College receives a request for information about a student's financial aid status, or if the request is for directory information but only for students who have received student financial aid, CCHS is restricted, under FERPA, from releasing that information without first securing the student's or former student's written consent. The College is not required to actively seek such consent, and thus may deny the original request, since to comply with it (without student permission) would disclose students' financial aid status.

2. Access to the student academic file is available to CCHS personnel on a need-to-know basis. Members of the leadership team and faculty may access the academic file without express permission. Signatures are required for all files removed from the registrar's office. Other college personnel desiring access will complete the Request for Access to Student

Information form, available from the registrar, and submit it to the registrar. Questions regarding the appropriateness of the request will be resolved by the dean of student affairs and enrollment management or by the president based on a determination of legitimate educational interest.

All personnel with access to student files must verify their understanding of FERPA via a signed statement to that effect. Annual in-service assures timely awareness of changes in FERPA.

In compliance with the Gramm-Leach-Bliley Act, the College designates the financial aid coordinator as the person responsible for information security of financial data in cooperation with the dean of administrative and financial services and the manager of instructional technology.

3. Active students have the right to review information contained in their academic file. Contents of the academic file belong to the College and originals will not be removed. To exercise the right of review, the student must provide a written request at least one full business day prior to the requested review and a college representative must be present during the review. Documents may be photocopied only when note taking is impractical and after approval by the person who maintains those records. If parents' financial information is maintained, the parent(s) may request that the information not be available for student review. Letters of recommendation and other documents for which the student has waived the right of review are closed to student inspection. A student has the right to dispute the contents of a file and may do so in writing to the dean of student affairs and enrollment management. This right does not extend to recorded grades unless a recording error is alleged. Final decisions regarding purging or correcting disputed contents will be made by the dean of student affairs.
4. Students who are 18 years of age and over are generally considered independent adults, and parents and other outside parties may have access to directory information only. Identified exceptions are listed below: In all other cases, the student must provide a written request for release of non-directory information. A new request must be submitted each time a release of information is authorized. A faxed request is acceptable.
 - a. Regulatory, accreditation, and federal agency representatives will be granted access to student and college files as needed.
 - b. Disclosures to parents are permitted in three situations:
 - Disclosure of a student's personally identifiable information to parents is permitted absent a student's written consent in the event of a health or safety emergency. The College may disclose education records in an emergency if the College determines that there is an articulable and significant threat to the health or safety of the student or other individuals.
 - Disclosure of a student's personally identifiable information is permitted to parents of the student if the student is a dependent pursuant to Section 152 of the Internal Revenue Code of 1986 and notice is given to the student that a parent has requested such information.
 - Disclosure of a student's personally identifiable information to parents is permitted without the student's written consent if the student is under 21 and has violated a law or college rule or policy governing alcohol or controlled substance consumption or possession.
 - c. Court or judicial bodies may subpoena student records. The College will attempt to notify the student of its compliance with the subpoena.
5. Courses that integrate the use of the college's learning management system create an electronic record of student activity that is subject to FERPA privacy rights. The identity

verification process for online courses protects student privacy through the use of a secure long-in and student-selected passwords to access the learning management system. Course records for online courses are protected with the same privacy as all other courses.

6. Students who believe their rights to privacy, as protected by FERPA, have been violated, should notify the dean of student affairs and enrollment management within 30 days of the occurrence or of their awareness of the occurrence. Students may file a complaint with the U.S. Department of Education's Family Policy Compliance Office.

B. Retention of Academic Records

1. The application file of a prospective student who does not enroll (denied, declined, incomplete, no-show) is retained for one year from the final application deadline for that class. All records relevant to admissions requirements are retained. Standard correspondence and irrelevant file notations may be purged. These files are maintained by the admissions office.
2. The matriculated student's application file is merged into a permanent academic file upon enrollment. Documents which demonstrate compliance with admission requirements, transcripts, transfer of credit worksheets, and exceptional correspondence are retained. This file is maintained by the registrar. The chart attached denotes the items which become part of the academic file as well as the length of time each is retained. Items not listed may be purged at the discretion of the registrar when no longer needed for normal operations.

C. Storage of Academic Records

1. Records for active students and the current-year's withdrawals are kept in a secure fire resistant file cabinet in the registrar's office. The registrar's office has a UL rated fire door. Academic files for inactive students are stored in the college vault. The vault is accessed only through the registrar's office and is locked each evening.
2. Computer Backup Procedures
The College's networks are managed by Carolinas HealthCare System's IS Department. Network servers are backed up to Optical Storage devices and backups are stored in the CHS Disaster Recovery Room.

D. Disposal

1. Computer data are disposed of by rewriting over the data.
2. Paper files which have met or exceeded retention requirements are discarded and, if they contain FERPA-protected information, are shredded.

E. Other Files

1. Files described below are maintained by functional departments within the college. Unless otherwise noted, access is limited to the president, provost, program dean/director, and/or support staff charged with file maintenance. Access may be requested by others via the request by completing the Access to Student Information Form. The program director may approve the request or may refer it to the provost for resolution.
2. Program records are maintained by the department staff assistants and/or program faculty under the guidance of the program administrators. Program records include testing records (answer sheets), records of other graded work, clinical evaluation tools, clinical skills check list, action plans, anecdotal notes, syllabi signature forms, attendance records, and other relevant or exceptional documents and notes. Students may review their program file by scheduling an appointment with the appropriate program administrator. Faculty have access to program records. Maintenance of program files is at the discretion of the program faculty,

director, and/or dean and is consistent with any programmatic accreditation requirements. At a minimum, program files for active students are kept in the staff assistant's, faculty's, or program director's office. Generally, at graduation or two years following withdrawal, the student's program records are shredded. Surgical technology program records are kept for five years. Program files for inactive nursing students are kept in the college vault and are moved there within a month after withdrawal. Grade books or grade rosters and attendance records for all courses are kept for a minimum of three years following the end of the class. Course syllabi for all courses are kept indefinitely.

3. Course records for general studies classes are maintained by the academic affairs office staff assistants. A file is maintained for each section of a general studies course offered. Faculty teaching the course, the director of general studies, and the provost have access to course records. Files may contain test answer sheets, papers, etc., to document the course grades; they are stored in the academic affairs office. One month following the end of the semester, copies of tests with the individual student summary sheets and syllabi signature forms are discarded. Student test sheets (Scantron sheets) along with the original exam with answer key and summary statistics are kept on file for three years. If course records contain FERPA-protected information, they are shredded. General studies faculty members retain samples of student work for assignments that are a part of assessment results for three years. Grade books and course syllabi are saved indefinitely in electronic format on the college network drive. Attendance records for all courses are kept for the current academic year (i.e., fall to summer) and then discarded.
4. Electronic records for online courses are saved at the end of each semester and are kept a minimum of five years.
5. Continuing education records are maintained in the vault as summary documents. For each program the brochure or descriptive literature will be maintained along with the roster of attendees/completers.
6. Financial files are maintained by the financial aid coordinator and the dean of administrative and financial services in the financial aid office. Access is limited to appropriate college personnel as determined by the financial aid coordinator and the dean of administrative and financial services. Students may review their financial file upon request to the dean of administrative and financial services or financial aid coordinator. The financial record contains details relating to that student's tuition account, scholarship funding, loans, and federal aid. When a student leaves the college, the financial aid file is merged with the academic file and maintained in the college vault. Files are maintained for seven years and are then shredded, except for loan records.
7. The following annual school historical records are maintained electronically indefinitely:
 - Dean of Student Affairs
 - Class rosters
 - Class demographic analysis
 - Catalog, brochure, and recruitment literature
 - Admissions summary data
 - Graduation program
 - Retention data
 - Placement summary data
 - Provost
 - IE plan
 - Annual report

8. Appeal files are maintained by the president in files in the administrative assistant's office for seven years from the date the appeal or complaint was filed. Files contain copies of documents relevant to the student's request for appeal, the president's response to that request, the appeal committee records and transcripts of the proceeding, and the findings of the committee. These files are not available for student review. Access is by express permission of the president for legitimate educational reasons. These files are maintained for seven years following the proceeding.
 9. Personnel files are maintained in compliance with Carolinas HealthCare System's personnel file policy. Official transcripts of all academic work are maintained to verify that job requirements are met and to support published academic credentials. These transcripts are maintained at the college for a period of 10 years after the person's final date of employment. When personnel are "shared" with a consortium or sister institution, copies of transcripts are adequate as long as official copies are readily accessible within 48 hours of request.
 10. In compliance with Federal Rules of Civil Procedure electronic discovery provisions, if sued, the College will maintain copies of all electronic records (i.e., emails, voice-mail messages, tapes, and web-site information including log files, metadata, cookies and any other electronically recorded information found on hard drives, servers, PDAs, cell phones, digital cameras, printers and fax machines) per Carolinas HealthCare System guidelines and capabilities.
 11. Institutional research data will be maintained for at least 10 years. Included are summarized data from survey tools and needs assessments. Raw data collected will be retained for a minimum of one year.
 12. College staff and committee meeting agendas and minutes will be kept electronically for 10 years. College board meeting materials will be kept indefinitely in the office of the secretary of the corporation and in the president's office.
 13. The College uses the services of the Carolinas Simulation Center, which records and collects learner interactions and conducts research. Maintenance of those records is governed by Simulation Center policy. As stipulated there, all files are maintained for one year from the date of occurrence or until the research study has concluded, whichever occurs last.
 14. Information security in support of the Gramm-Leach-Bliley Act is maintained through risk assessment and planning and by ensuring confidentiality and integrity of student information. The student's financial records and academic records are maintained separately until the student leaves the college, with access control described above.
 15. Documentation of all student HIPAA violations will be maintained by the college for at least 6 years following the incident. If a breach of patient health information results from the HIPAA violation, then the documentation of the incident will be maintained by the college indefinitely (the final determination if a breach occurred is determined by Corporate Privacy along with the IS security).
- F. The College Records - Privacy, Retention, and Storage policy and procedure will be reviewed bi-annually.

III. APPROVAL

Name: _____ Title: President Date: _____

CAROLINAS COLLEGE OF HEALTH SCIENCES
Record Retention/Storage Guidelines

Records listed may be disposed of at the interval noted. Final column indicates record for which an electronic back-up copy is maintained. "Basis of Admission" includes all items which are part of the criteria for selection (test scores, transcripts, application, immunization records, original CPR certification, etc.). "Exceptional correspondence" is that which is specific to an individual student's unique situation.

	Graduation or 2 Years from LDA	1 Year after graduation or date of request	7 Years from LDA	10 Years	Maintain for Perpetuity
Appeals & Grievances			X		
CCHS Final Transcript					X
Basis of Admission/Readmission			X		
Transfer Credit Evaluation			X		
Acceptance Letter			X		
CPR Renewal	X				
Release of Confidentiality Requests		X			
Master List of Transcript Releases		X			
Withdrawal Requests			X		
Exceptional Correspondence/ Anecdotal Notes			X		
Drop-Add Requests	X				
Class Schedule	X				
Grade Reports	X				
Requests to Graduate/Degree Audit			X		
Catalog Receipt/Drug Policy Awareness	X				
Name Change Documents			X		
Registration Forms	X				
Program Records	Varies by program. See policy.				
Financial					
Tuition Itemization & Fee Assessment			X		
Financial Aid Records (other than loans)			X		
Loan Paperwork	Loan paperwork is maintained for the life of the loan.				
VA Paperwork			X		
Personnel Files	Sent to HR upon termination. Transcripts maintained on campus 10 years				
Committee & College Staff Meetings				X	
Catalog, IE Plan, Annual Report					X
Institutional Research		Raw Data			Summary Data
Simulation Center Educational Research	Disposed of at completion of appropriate research study. Debrief files disposed of 1 year after graduation or withdrawal from the program.				
Consent to Participate in Invasive Procedures		X			

CAROLINAS COLLEGE OF HEALTH SCIENCES
Request for Access to Student Information

Name: _____

Phone: _____

This form is used to request file access where access is not expressly granted in the college policy, "College Records - Privacy, Retention, and Storage."

The college staff member charged with responsibility for the file in question may approve the request or may refer it to the department coordinator or the administrator/director.

REQUEST FOR ACCESS TO STUDENT INFORMATION

Your position/title: _____

Organization (if other than CCHS): _____

Specific information or file needed: _____

Purpose for which information will be used: _____

Will information be taken from this office: Yes No

If yes, where will information be used? _____

If yes, when will it be returned? _____

Information will be photocopied _____

Information will be shared with _____

Information will be taken off campus: _____

Signature of requestor: _____

Date: _____

Signature of file manager: _____

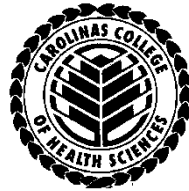
Date: _____

Signature of department manager or administrator/director, as needed: _____

Date: _____

Notes: _____

Carolinas College of Health Sciences



Family Education Rights and Privacy Act Agreement

You have been authorized to have access, either electronically or hard copy, to some or all student records. Please review the Records Policy in the CCHS Policy and Procedures Handbook on how to obtain this information. Please remember that much of this data contains confidential student information. All student information is protected by the Family Education Rights and Privacy Act (FERPA).

The Family Education Rights and Privacy Act, Buckley Amendment, requires Carolinas College of Health Sciences to maintain the confidentiality of all student educational records. The College is not permitted to release information from a student's educational record without the student's written consent.

When reviewing student information, make certain that no other student or outside party can view or have access to this information; therefore, photocopying or printing of any records should be avoided. Third party access to a student's educational record, without the student's consent, is a violation of the law.

Directory information is available for release through the Student Directory and SONIS software. Students have the ability to request non-disclosure of this information; therefore, caution is advisable when releasing student directory information. Student enrollment verification should be referred to the registrar or director of student services and enrollment management.

If you would like more information concerning the Family Education Rights and Privacy Act (FERPA), feel free to contact the registrar's office.

Thank you for your cooperation in protecting the privacy rights of our students. Please sign the statement below and return it to the registrar, Carolinas College of Health Sciences. I have read the above information and agree to comply with all federal and Carolinas College of Health Sciences policies on the use of student records.

Signature

Date

Title

Department