



RECORDS MAINTENANCE

POLICY

EDUCATIONAL RECORDS

In accordance with The Family Educational Rights and Privacy Act of 1974 and its amendments (FERPA), Sherman College maintains educational records on each student. Educational records as defined by FERPA, are “those records, files, documents, and other materials which contain information directly related to a student; and are maintained by an educational agency or institution or by a person acting for such agency or institution.”

ACADEMIC RECORDS

Student educational records are categorized as either academic or non-academic. Academic records pertain to the student’s academic program and include the unabridged chronological history of admission and progress within the program. These records contain admission correspondence and pre-chiropractic college transcripts, grade reports, transfer credit evaluations, advisor reports, copies of President’s/Dean’s Lists letters, probation, suspension and/or dismissal letters, the student’s complete academic history, registration, drop/add, grade change forms and miscellaneous correspondence between the student and the college.

The permanent academic record is the total chronological listing of the student’s qualitative and quantitative achievements and is maintained indefinitely. Peripheral documents from the academic file are maintained for a minimum of five years after the last date of attendance.

In keeping with FERPA, educational records do not include records of instructional, supervisory, administrative and educational personnel, which are in their sole possession and are not revealed to any other person. Nor do they include the unofficial educational records maintained by mentors. These records, consisting of student grade reports, correspondence relating to the student’s academic progress and academic standing, are not official student records and are not subject to review by the student.

The registrar maintains, monitors and controls access to academic records. In addition to the registrar’s office, all or selected documents from an academic file may be accessed by the president, provost, vice president for enrollment and student success and the director of financial aid. When hearing an appeal initiated by a student, the members of the respective board or council may also have access to certain student records.



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INTERN RECORDS

The student intern record is the total listing of the student's qualitative and quantitative clinical achievements and is maintained for a period of three years from the date of graduation in the archives of the chiropractic center. The coordinator for clinic operations maintains, monitors and controls access to student intern records.

RELEASE OF ACADEMIC RECORD INFORMATION

Directory Information

The college may release directory information without the written consent of the student. Directory information may include name, address, telephone listing, date and place of birth, dates of attendance, degrees and honors awarded, and the last institution attended. The registrar will notify enrolled students annually of their rights under FERPA and of the types of personally identifiable information that the college has identified as directory information. At this time, students will be given an opportunity to indicate if they wish to have directory information withheld by the college. The student may not request that only certain directory information be withheld. All other educational information is confidential and will be treated as such.

Release of Records

Apart from directory information, Sherman College does not release personally identifiable information from educational records without prior written consent of the student except as specified under FERPA provisions. When personal identifiable information is authorized and released, the college provides a statement informing the recipient of the records that the release of such information to a third party is not permitted without the written consent of the student.

Other exceptions to this disclosure policy include the release of such information to college personnel, other organizations or institutions providing financial aid to students, accrediting agencies performing routine functions, or in an emergency to protect the health or safety of students, etc. In addition, the college is required to disclose educational records to federal and state representatives of agencies listed in FERPA.

The college maintains records of disclosure and requests for disclosure of student records made by agencies other than the student indicating the legitimate interest that each person, organization or agency had in obtaining the records. These will be maintained if the academic file is retained.

Transcript Requests

The office of the registrar processes transcript requests. Such requests must be submitted in writing, or online with student consent, and may not be taken by telephone. The college provides the first transcript copy free of charge and assesses current fees for subsequent copies. Second requests must be accompanied by payment, as the college does not bill for transcripts. All



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transcript requests are maintained by the office of the registrar for a minimum of one year. In compliance with FERPA regulations, Sherman College does not release copies of transcripts from high schools or other colleges to any other institutions.

Official transcripts are printed on safety paper bearing the registrar's signature.

Sherman College of Chiropractic complies with U.S. Department of Education §§ 668.14 requirements for provision of transcripts, which allow the college the right to withhold transcripts in certain circumstances.

Security

To ensure security and integrity of all academic records, several measures are followed. Hard copies of all students' files are stored in locked file cabinets with deadbolt locking systems. . All student transcript copies are stored with Instructure on secured servers.

The director of information technology, with input from the registrar, is responsible for determining who will have access to academic records and the level and type of access needed. The director of information technology also has the larger responsibility of ensuring that future system changes will provide appropriate security and retrieval of student records.

Sherman College recognizes the importance of ensuring that all persons having access to personally identifiable data are aware of their responsibility for maintaining the integrity and confidentiality of information. All individuals who routinely use personally identifiable information will be reminded regularly of the importance of avoiding any discussion of students' records, grades, eligibility, etc. outside of the office. Personnel authorized to maintain security paper, institutional seals, diplomas, etc. in carrying out their responsibilities will be trained to keep such supplies in secure locations when not in use or when the office is locked.

Retention and Disposal

The student's complete academic file is maintained in hard copy format for five (5) complete years after the last date of attendance. After five years, all of the materials in the academic file are destroyed, and only the student's permanent academic record is maintained. The college follows guidelines published by the *American Association of Collegiate Registrars and Admissions Officers* as they relate to retention and disposal of academic records. An up-to-date copy of these guidelines is maintained in the office of the registrar for reference purposes.

NON-ACADEMIC RECORDS

Non-academic records are those student records, which do not pertain to the student's academic progress or standing. They include various types of records as described below.



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Financial Records

The office of business and finance maintains and monitors financial records. Tuition and fee assessments are currently generated and maintained in the SIS. CAMS was previously used for all students whose attendance dates are from 2000 to 2019 or later. Prior to 1997, all financial records were recorded manually. Other records consisting of financial transactions between the student and the college, correspondence with the student regarding financial status, and correspondence with institutions and agencies, which provide financial sponsorship to students are maintained in hard copy format in locked files. All computerized files are password protected. The office follows federal guidelines with respect to retention and disposal of records. Beginning in 2001, a hard copy of each graduating student's financial record is added to the student's financial aid file and academic file, where it will be retained for a minimum of five (5) calendar years. These records may be accessed by the executive vice president, vice president for finance and campus operations and related staff.

Student Affairs Records

The vice president for enrollment and student success and the director for student affairs maintain records relating to disciplinary action, academic accommodations, counseling and confidential correspondence between the student and the college. Except for counseling files, these records may be accessed by the president, provost and related staff. In accordance with HIPAA and patient confidentiality, counseling files derived from sessions with the campus counselors are maintained and only accessible by the campus counselors. Non-identifying utilization reports including trends and topics from the lead campus counselor is available only to the vice president for enrollment and student success. Campus counselors follow safety protocols in which they alert the vice president for enrollment and student success if there are any safety or health concerns for a student receiving services or others within the institution.

Financial Aid Records

The director of financial aid maintains and monitors financial aid records. They consist of parent/student confidential statements, records of veterans or students having veteran-dependent status, records of VA certification by student term, records of financial assistance awards and correspondence with students. The office follows federal guidelines relating to retention and disposal of records. These records may be accessed by the president, provost, vice president for finance and campus operations, and related staff, and are maintained in hard copy format in locked file cabinets and/or in password protected computer files.

Campus Security Records

The campus security and safety manager maintains and monitors records of campus incidents and police reports relating to students and other members of the campus community. The records are kept in hardcopy format. These files are then used to publish the Campus Safety Report. In addition to the manager, these records may be accessed by the president, provost, vice presidents for enrollment and student success, finance and campus operations, and related staff.



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REVIEW AND CHALLENGE OF RECORDS

The college complies with FERPA guidelines with regard to the student's right to review official records. Except as precluded by FERPA, each student has the right to review his/her own record and request an interpretation or explanation of the record. A student wishing to review records covered under FERPA provisions must submit a written request to the person charged with the maintenance of the desired records. Access to these records will be made within a reasonable period of time, not to exceed 45 days from the time the request is made.

Should a student believe that any part of his/her record is inaccurate, misleading or otherwise inappropriate, he/she should submit a written request to have the record amended. The request should be directed to the person charged with maintenance of the record in question and should include a description of the specific record and the reason for the challenge. The keeper of the record will provide a written response to the student within a reasonable period of time. If the challenge is not resolved to the student's satisfaction, at this level, the student has the right to submit the challenge of the record to the appropriate board or committee (ex., disputes of academic records must be submitted to the Academic Affairs Committee). The student will be notified of the board or committee's decision within a reasonable period of time.

Cease of Operations

In the event of dissolution of this corporation, or in the event it shall cease to operate in accordance with its mission herein set forth, all business, property, and assets of the corporation shall go and be distributed to one or more non-profit corporations or public bodies as may be selected by the Board of Trustees of this corporation and approved by at least 75 percent of the Trustees then serving on the Board to be used for, and devoted to, the purpose of a community facility project or other purpose to serve the public welfare of the community. In no event shall any of the assets or property, in the event of dissolution thereof, go or be distributed to members, directors, stockholders, or others having financial or managerial interest in the corporation either for the reimbursement of any sum subscribed, donated or contributed by such members or for any other purposes, provided that nothing herein shall prohibit the corporation from paying its just debts.