

SUBJECT:	Student Record Management and Retention Schedule
REVIEWED/REVISED:	1/2011; 1/2013; 8/2014; 8/2015; 8/2019; 4/2022
PURPOSE:	To ensure necessary student records and documents are adequately protected and maintained and that records no longer needed or of no value are discarded at the proper time.
POLICY OWNER:	Vice President, Institutional Effectiveness

POLICY:

This Record Retention Schedule applies to any and all forms of records retained for services by Nebraska Methodist College's (NMC) offices of Admissions, Student Engagement, Student Records and Registration, Financial Aid, Professional Development, and Federal Grant Programs. Each department shall retain records for periods required by federal or state statutes and regulations in a safe and secure manner. For NMC administrative records, see the Methodist Health System Record Retention Schedule.

Procedure:

1. The NMC Vice President of Institutional Effectiveness, in conjunction with the Methodist Health System ("MHS") Chief Compliance Officer, shall be the "Records Custodian" for NMC and serve as the decision-maker and resource with respect to medical and FERPA-protected student records.
2. Retention periods may be extended beyond the period defined by statute or regulation for risk management purposes.
3. When there is an express or implied requirement of retention for a particular category of record, but no defined time period exists under statute or regulation, the retention period shall be **three (3) years** in accordance with the Paperwork Reduction Act and the Uniform Preservation of Private Business Records Acts, unless otherwise determined by the Records Custodian.
4. Each department shall date and flag records for destruction on a regular schedule. Records shall be destroyed in a manner preserving confidentiality in accordance with MHS Document Destruction Policy.
5. If there are any conflicts between the NMC Record Retention Schedule and the MHS Record Retention Schedule, the MHS Record Retention Schedule will prevail.

6. All records shall be stored electronically in a manner approved by the NMC Vice President of Institutional Effectiveness, and in accordance with Education Technology's recommendations.
7. Departments shall dispose of paper records that **do not** have a **permanent** retention designation after electronic copies have been made.
8. Records shall be retained according to the following schedules:

Office of Admissions

The Office of Admissions documents the application and evaluation process for students applying to enter who are denied admission or who were admitted but failed to enroll or withdraw. Records may include but, are not limited to: applications for admission; letters of acceptance or rejection; test scores; standardized examination reports; foreign student documentation; letters of recommendation; resumes; transcripts from high school and/or other colleges; and related documentation and correspondence. Records are retained by the Office of Admissions for three (3) years after denial of admission or one (1) year after notification of admission if applicant fails to enroll or withdraws.

Office of Student Engagement

P = permanent; A = active period (enrolled in classes)

<u>Name of Record</u>	<u>Retention Period</u>
Student Housing Agreements (Housing Contract, Family Housing Contract, Renter's Agreement)	A + 10 yrs
Pathfinder/Ambassador Contracts	A + 3 yrs
Counseling Services (includes clergy/chaplain) List of student appointments (Counseling schedules); referral letters or letters to agencies or others concerning student; consent forms; release of information forms; counselor notes	A + 5 yrs
Agreements with Third-Parties	Term of agreement + 10 yrs
Campus Health Center (All medical records – student and employees) (i.e., immunizations, health history/screening sheets; personal health history sheets; laboratory test results; medical records received from physicians)	A + 10 yrs (after last date of service)
Academic Skills Health professional evaluation reports; physicians' statements and letters of recommendations; Counseling interview notes and referrals; documentation of accommodation; questionnaires	A + 7 yrs

Student Judicial Affairs (All student conduct history (e.g., complaints, grievances, hearings))	
Student disciplinary records for student who have been expelled and/or suspended	Permanent
All other disciplinary records (those not resulting in suspension of expulsion)	A + 7 yrs
Waiver of Liability and Hold Harmless Agreements (Release Forms)	A + 10 yrs
Advisement (Copies of transcripts; grade reports; personal data sheets; appointment and advisement records; correspondence; all other advisement documentation)	
Admitted, <u>do not</u> matriculate	3 yrs
Admitted and matriculate	A + 3 yrs

Office of Student Records and Registration

Faculty is responsible for maintaining complete and accurate records of students enrolled in their course(s), electronically when possible. Faculty must submit the grade records for all classes taught to the appropriate administrator upon termination of employment or when requested. Support documentation of student performance over and above assigned grades (i.e., submitted papers, projects, copies of tests, etc.) must be maintained **at least 45 days** from issuance of final course grade before being destroyed.

Student records will be maintained by the Office of Student Records and Registration in accordance with guidelines provided by the American Association of Collegiate Registrars and Admissions Officers (AACRAO), as official student records provide documentation of the student's progress through a program of study. Upon a student's matriculation into the College, student records are forwarded from the Office of Admissions to the Office of Student Records and Registration. Permanent academic records for current students will be kept up-to-date and stored in locked cabinets under the direction of the Office of Student Records and Registration. Once a student withdraws or graduates from Nebraska Methodist College, the file is stored in locked filing cabinets.

According to AACRAO's *Retention of Records—Guide for Retention and Disposal of Student Records* (2000 Edition), some documents from institutions in other countries may be originals and therefore difficult or impossible for the applicant to replace. Because of this, the Student Records Office may choose to return these documents to the student after the student graduates or withdraws from NMC.

After **five (5) years**, each student file is purged. The following items are retained **permanently**:

- Final transcript from Nebraska Methodist College
- Student requests for nondisclosure of directory information (FERPA Non-Disclosure Form) - unless terminated by the student
- Student's written consent for records disclosure (FERPA Waiver Release Form)

- until expiration date passes or terminated by the student
- Fulfilled third party requests for student information without the student's written permission (but were covered under FERPA's exceptions)
- Anything labeled "PERMANENT"

The following items will be retained for **five (5) years** in the Student Record's Office:

- Registration forms
- Drop/add forms
- National Student Clearinghouse enrollment reports

The following items will be retained for **one (1) year** in the Student Record's Office:

- Transcript requests made by the student
- Enrollment verifications
- Degree verifications

The following items will be retained **permanently** by the Student Record's Office:

- Grade binders (student grade reports by semester, change of grade forms)
- Graduation lists/commencement programs
- Fulfilled third party requests for student information without the student's written permission (but were covered under FERPA's exceptions)
- College catalogs
- Schedule of classes

This policy closely follows record retention guidelines outlined in *AACRAO's Retention of Records – Guide for Retention and Disposal of Student Records (2000 Edition)*.

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Office of Financial Aid

Purge After	...if all of the conditions to the right are true	NSL LDA on or before ¹	Student's Last Date of Attendance (LDA) on or before ²	NFLP repaid on or before ³	Perkins repayment on or before ⁴
6/30/2022	>>>	6/30/2017	6/30/2018	6/30/2019	6/30/2019
6/30/2023	>>>	6/30/2018	6/30/2019	6/30/2020	6/30/2020
6/30/2024	>>>	6/30/2019	6/30/2020	6/30/2021	6/30/2021
6/30/2025	>>>	6/30/2020	6/30/2021	6/30/2022	6/30/2022
6/30/2026	>>>	6/30/2021	6/30/2022	6/30/2023	6/30/2023
6/30/2027	>>>	6/30/2022	6/30/2023	6/30/2024	6/30/2024
6/30/2028	>>>	6/30/2023	6/30/2024	6/30/2025	6/30/2025
6/30/2029	>>>	6/30/2024	6/30/2025	6/30/2026	6/30/2026
6/30/2030	>>>	6/30/2025	6/30/2026	6/30/2027	6/30/2027
6/30/2031	>>>	6/30/2026	6/30/2027	6/30/2028	6/30/2028
6/30/2032	>>>	6/30/2027	6/30/2028	6/30/2029	6/30/2029
6/30/2033	>>>	6/30/2028	6/30/2029	6/30/2030	6/30/2030
6/30/2034	>>>	6/30/2029	6/30/2030	6/30/2031	6/30/2031
6/30/2035	>>>	6/30/2030	6/30/2031	6/30/2032	6/30/2032
6/30/2036	>>>	6/30/2031	6/30/2032	6/30/2033	6/30/2033
6/30/2037	>>>	6/30/2032	6/30/2033	6/30/2034	6/30/2034
6/30/2038	>>>	6/30/2033	6/30/2034	6/30/2035	6/30/2035
6/30/2039	>>>	6/30/2034	6/30/2035	6/30/2036	6/30/2036

¹ NSL records must be kept **five (5) years** after student's last date of enrollment half- time or greater.

² Although other student records must be kept **three (3) years** from end of award year⁵ during which student last attended, data supporting the FISAP must be kept **three (3) years** from the end of the award year⁵ during which the FISAP was submitted. Therefore, student files are kept for **four (4) years** after end of award year⁵ in which student last attended.

³ NFLP records must be kept **three (3) years** after loan is retired

⁴ Perkins records must be kept **three (3) years** from date loan was repaid, cancelled or assigned to the Department of Education.

⁵ An award year is the period of July 1 - June 30.

Office of Professional Development

Programs under the Office of Professional Development comply with the record retention policies of their affiliated program accrediting bodies. Records for all Professional Development programs are retained and secured for a minimum of **two (2) years**, unless otherwise indicated in the schedule below. Thereafter, program information is destroyed.

P = permanent; A = active period (enrolled in program)

<u>Name of Record</u>	<u>Retention Period</u>
BLS/American Heart Association	A + 3 yrs
Continuing Education Programs <i>(see also Professional Development Record Retention policy for further details)</i>	A + 6 yrs
Pediatric Lead Testing/DCHC <i>(see also Douglas County Health Department Record Retention policy for further details)</i>	A + 2 yrs
Nursing Assistant	2 yrs, or the time of the last state survey
Pharmacy Technician	A + 3 yrs
Phlebotomy	A + 5 yrs
Sterile Processing Technician	A + 3 yrs

Federal Grant Programs

TRIO Student Support Services, Upward Bound, and the Upward Bound Math & Science program all comply with the *CFR § 200.333 – Retention requirements for records*, which indicates that all financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a federal award must be retained for **three (3) years** from the date of submission of the final expenditure report.