

Virginia Tech Carilion School of Medicine (VTCSOM)

Policy: Student Records
Subject: Student Affairs; Enrollment Management/Registrar
Administrator: H. Reynolds
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1 Purpose

Student records at VTCSOM are defined as any portion of the educational history of a student in which a student can be personally identified and that is maintained by the school for the purpose of sharing with other academic officials and is intended to support the academic progress of the student. VTCSOM follows the Family Education Rights and Privacy Act of 1974 (U.S. Public Law 93-579) (FERPA) with respect to the confidentiality of student records and access to that information. In addition to guaranteeing the individual's rights to access, FERPA also provides guidance for third party access to the records.

2 Policy

As of January 3, 2012, the U.S. Department of Education's FERPA regulations expand the circumstances under which your education records and personally identifiable information (PII) contained in such records — including your Social Security Number, grades, or other private information — may be accessed without your consent. First, the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or state and local education authorities ("Federal and State Authorities") may allow access to your records and PII without your consent to any third party designated by a Federal or State Authority to evaluate a federal- or state-supported education program. The evaluation may relate to any program that is "principally engaged in the provision of education," such as early childhood education and job training, as well as any program that is administered by an education agency or institution. Second, Federal and State Authorities may allow access to your education records and PII without your consent to researchers performing certain types of studies, in certain cases even when we object to or do not request such research. Federal and State Authorities must obtain certain use-restriction and data security promises from the entities that they authorize to receive your PII, but the Authorities need not maintain direct control over such entities. In addition, in connection with Statewide Longitudinal Data Systems, State Authorities may collect, compile, permanently retain, and share without your consent PII from your education records, and they may track your participation in education and other programs by linking such PII to other personal information about you that they obtain from other Federal or State data sources, including workforce development, unemployment insurance, child welfare, juvenile justice, military service, and migrant student records systems.

3 Procedures

Collection

The Office of the Registrar is the primary administrator of student academic records, and has oversight responsibility for the management and maintenance of these records. This responsibility and activity follows the guidelines contained in the AAMC's Handbook for Student Records Administrators, November 2014, and the AAMC's Guidelines for Maintaining Active and Permanent Individual Student Records, December 2014.

Maintenance

Student Records are stored securely in the VTCSOM Administrative Suite in the Office of Administrative and Educational Support Services in fire-proof, locked safes. Keys or combinations are in the possession of only the authorized custodians.

In keeping with state law and school policies, student records will be retained for a specific period based on content as identified in the AAMC Handbook for Student Records Administrators, November 2014. Details can be found at http://www.aamc.org/members/gsa/active_permanent_records0305.pdf. Record formats may include handwritten, printed, computer images or data, e-mail, video/photos, and audio tapes. However, academic records do not include private notes maintained by a VTCSOM official that are not accessible or released to other personnel, law enforcement or campus security records, medical records except those noted above, employment records, and alumni records.

Confidentiality

Students have a right to expect that faculty and staff will respect their privacy and deal with sensitive information in an appropriate and professional manner. Information on an individual student's grades, performance on external examinations (e.g., USMLE), financial status, medical problems, personal problems, and similar sensitive information is handled carefully so as to prevent disclosure to unauthorized individuals.

Records may be viewed only on a "need to know" basis and only when the viewing is necessary as part of the student's academic activities. School officials with such access are defined as those persons appointed by VTC in an administrative, supervisory, academic (MSPPC committee members, PTLC leaders, student designated advisors), research, or support staff position (including security personnel and health staff); a person or company with whom VTCSOM has contracted (such as an attorney, auditor, or collection agent); a duly appointed agent or representative of the VTC acting within the scope of his or her appointment; or a student serving on an official committee, such as the Medical Student Performance and Promotion Committee (MSPPC), or assisting another school official in performing his or her tasks, e.g. a faculty member or student on an ad hoc committee investigating unprofessional behavior under the auspices of the MSPPC. This viewing does not require the student's permission. Other facilitators, faculty members, instructors, mentors, and other persons may not view the student's record without the written consent of the student. A copy of this release of information will remain as part of the permanent record.

Dissemination

FERPA allows for the designation of certain student record information as "directory" [academic record information not requiring prior written permission to release]. This information will not be available to vendors. VTCSOM defines directory information as follows:

- Student's name
- Student's photo (Photographic Rosters are only supplied to faculty for Educational Purposes)
- Local and Permanent address
- Telephone Number(s)
- Major field of study (M.D.)
- Whether a student is currently enrolled
- Enrollment status
- Class (M1, M2, etc.)/Academic Level
- NRMP (National Resident Matching Program) results
- Anticipated graduation date
- Certification of application for degree
- Dates of enrollment
- Degree(s) earned, including date, honors and level of distinction
- Participation in officially recognized activities
- Electronic Theses and Dissertations (ETD)

Directory information will be withheld if requested in writing by the student. Such requests may be submitted to the Registrar, and a copy of the form will be maintained as part of the student's record.

No parts of the record may be copied without the student's permission. No parts of the record may be altered. No portions of the record may be removed except through petition to the Registrar and based on records found to be contrary to fact.

Students are afforded the following rights with respect to their student records:

1. The right to inspect and review his/her student records within 7 days of the day the School receives a request for access. Students should submit to the Registrar a written request that identifies the record(s) they wish to inspect. The VTCSOM official will make arrangements for access and notify the student of the time and place when the records may be inspected. Materials in any student record cannot be modified, removed, or copied by the student.
2. The right to request the amendment of his/her student records that the student believes to be inaccurate or misleading. Students may ask VTCSOM to amend a record that they believe is inaccurate or misleading. They should write the VTCSOM official responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading. If VTCSOM decides not to amend the record as requested by the student, VTCSOM will notify the student of the decision and advise the student of his/her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.
3. The right to consent to disclosures of personally identifiable information contained in the student's records, except to the extent that FERPA authorizes disclosures without consent. Access to students' records, except directory information, which may be released, is never granted to individuals from off campus requesting information, unless the student involved has given written permission or as applicable law requires.

To minimize the risk of improper disclosure, academic, educational, health, financial and student affairs records (including disciplinary records) are kept separate. Students may authorize disclosure of information to parents or anyone else by completing a Consent to Disclose Information from Educational Records Form available in the Registrar's Office. This authorization for disclosure may also be revoked by the student through written notification to the Registrar's Office.

VTCSOM may also exercise its discretion to disclose information from the student's educational records (either with or without student identification) without written authorization from the student under the following circumstances:

1. to federal, state, and local authorities involved in the audit or evaluation of compliance with education programs;
2. to comply with a judicial order or subpoena, provided that VTCSOM make a reasonable effort to notify the student of the order or subpoena in advance of compliance, when the order or subpoena does not prohibit such notification;
3. in connection with financial aid;
4. to organizations conducting studies for educational purposes (de-identified only);
5. to accrediting organizations;
6. to the parents of a dependent student (special guidelines apply);
7. when a health or safety emergency is apparent;
8. when directory information is being released;
9. to an alleged victim of a crime of violence, the final results of a disciplinary hearing may be disclosed (limited to the student's name, the violation committed and the sanction imposed). Disclosure of final results pursuant to this section may be made regardless of whether the school determined that a violation occurred. The school may not disclose the name of any other student, including a victim or witness, without the prior consent of the other student; and
10. to school officials who have a legitimate educational interest.

A school official is a person employed or appointed by VTC in an administrative, supervisory, academic (MSPPC committee members, PTLC leaders, student designated advisors), research, or support staff position (including security personnel and health staff); a person or company with whom VTCSOM has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Directors; a duly appointed agent or representative of the VTC acting within the scope of his or her appointment; or a student serving on an official committee, such as the Medical Student Performance and Promotion Committee (MSPPC), or assisting another school official in performing his or her tasks, e.g. a faculty member or student on an ad hoc committee investigating unprofessional behavior under the auspices of the MSPPC.

A school official has a legitimate educational interest if the official needs to review a student record in order to fulfill his or her professional responsibility, perform a task related to a student's education, or perform a task related to a disciplinary action involving a student. All such officials are required to sign VTCSOM's "Confidentiality Agreement".

A student at VTCSOM has a legitimate educational interest if he/she is performing a task related to his/her membership on an official school committee where education records are reviewed or discussed.

Students may not access the records of other students without satisfying the above reason for legitimate educational interest in specific records. This applies to paper and electronic records.

The right to file a complaint with the U.S. Department of Education concerning the alleged failures by VTC to comply with requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Offices, U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202-4605.

Ordering/Withholding Transcripts:

Students may request a transcript by mail or in person to the Registrar. Transcripts include all coursework attempted at VTCSOM. Transcript requests can be held for pending grades and/or graduation.

Transcripts cannot be produced for anyone whose record is being held by Student Financial Services because of a past-due financial obligation or by the MSPPC because of a pending investigation.

Permanent Record Storage:

Upon completion of all graduation requirements, the Registrar will electronically store the student's documents listed below and permanently store hard copies of each student academic file by using a document management system. Files of students who do not complete the course of study will be archived in the same manner. The Registrar's Office will have computer access to obtain any of the electronically stored documents. The only permanently archived student documents retained at VTCSOM are under the custodial care of the Registrar and will include the following:

1. AMCAS application for 5 years after graduation or separation - AMCAS data is maintained in electronic format for 5 years after the application
2. Transcripts from previously attended institutions - These transcripts are the property of the issuing institution and cannot be distributed to other institutions on behalf of the student.
3. Official dates of enrollment at VTC, dates of leaves of absences or withdrawal, and graduation date
4. Official transcript of all medical school work
5. USMLE scores, ID number, exam date, and notation of pass or fail
6. Student's final course performance evaluations - This data is maintained for 5 years after graduation or separation.

7. Documentation of grade changes - This data is maintained for 5 years after graduation or separation.
8. Documentation of grade appeals - This data is maintained for 1 year after final appeal decision is rendered.
9. Documentation of dismissal, withdrawal on Enrollment Status Change Form, or any disciplinary action
10. Medical Student Performance Evaluation (MSPE, formerly the Dean's Letter), including appendices
11. Institutional technical standard forms for admission and graduation
12. Personal identification, such as the student's photograph and a document containing the student's signature
13. Copy of diploma