

APPROVED

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SUPPLEMENTAL

* Whenever the recommended retention period is the "life of the affected record," the retention period of the FERPA document is meant to be the same as that of the student record to which it pertains: students' waivers of rights to access to letters of recommendation, for example, should be retained until terminated or the letters themselves are destroyed. If the retention period for a record to which a Family Educational Rights and Privacy Act (FERPA) document pertains is permanent, the FERPA document should also be permanently retained and microfilmed for added security.

STUDENT RECORDS -- ADMISSIONS DATA/DOCUMENTS FOR APPLICANTS WHO DO NOT ENTER WHETHER ACCEPTED OR REJECTED

1. Although the retention period recommended for the documents listed above is one year, federal legislation, state statutes, or institutional policy may dictate otherwise. The federal legislation which governs these records is as follows:

Veterans Administration regulations require that all recruitment materials be retained three years.

2. Records for applicants who do not enter are not covered by FERPA.
3. Some documents from institutions in other countries may be originals and therefore difficult or impossible for the applicant to replace. The records custodian may want to return these documents to the applicant rather than destroying them.

STUDENT RECORDS -- ADMISSIONS DATA/DOCUMENTS FOR APPLICANTS WHO ENTER

1. The retention periods recommended are based on the following:
 - a. The forms are maintained in individual student folders and are retained no longer than five years after graduation or date, term, or semester and year of last attendance.
 - b. Uniform retention periods allow for the destruction of the entire folder which will save considerable sorting.
 - c. Essential data will be recorded on academic records which are retained permanently.
2. Family Educational Rights and Privacy Act (FERPA) states that letters of recommendation not accompanied by waivers and retained beyond their intended use may be viewed by the student. As a consequence, it is recommended that these letters be destroyed after admission of the student. Waivers of rights of access filed with letters of recommendations should be retained as long as the file is retained. Students who revoke their waivers of rights of access may not see letters of recommendation during the time the waivers were in force.
3. The Veterans Administration (VA) regulations state that the following student records must be retained for at least three years after termination of enrollment:
 - a. Previous education or training (transcripts from other colleges).
 - b. Evidence of formal admission (acceptance letters). The regulations state that longer retention will not be required unless a written request is received from the General Accounting Office or the VA no later than 30 days prior to the end of the three-year period.
4. Educational institutions which participate in federal, state, and private programs of low-interest loans to students must retain student records of admission and placement for five years after graduation or withdrawal. In the event of an open audit, records must be retained until all questions are resolved.
5. Some documents from institutions in other countries might be originals and therefore difficult for the applicant to replace, The records custodian may want to return these documents to the applicant rather than destroying them.

STUDENT RECORDS -- REGISTRATION AND RECORDS DATA/DOCUMENTS

1. Any record recommended for permanent retention should be microfilmed for security even if the originals are retained. The original microfilm should be stored and secured in an off-site location.
2. The recommended five-year retention period noted in the schedule begins with the date of graduation or the date, term, or semester and year of last attendance.
3. The Family Educational Rights and Privacy Act (FERPA) specifically requires institutions to maintain records of requests and disclosures of personally identifiable information except for defined "directory information" and requests from students for their own records. The records of disclosures and requests for disclosures are considered part of the students' educational records; therefore, they must be retained as long as the educational records to which they refer are retained by the institution.
4. The Veterans Administration (VA) regulations state that the following records must be retained for at least three years after termination of enrollment:
 - a. Grade reports and/or statements of progress (academic records)
 - b. Change of course forms
 - c. Transfer credit evaluations
 - d. Degree audit records

VA regulations require that all advertising, sales, and enrollment materials (e.g. catalogs and brochures) used by or on behalf of the institution be retained three years after the termination of a veteran's enrollment. In addition, records of tuition and fees charged to and collected from students, grade reports and statements of progress (academic records), and previous education and training documents (transfer credit evaluations) must be retained for three years.
5. Educational institutions which participate in federal, state, and private programs of low-interest loans to students must retain for five years after graduation or withdrawal students' records of academic progress, attendance, and courses studied. In the event of an open audit, records must be retained until all questions are resolved.
6. Although student records created and maintained by medical and dental schools are usually narrative assessments of academic progress or clinical practice, for purposes of this retention schedule, such records are in the same category as the academic record.

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STUDENT RECORDS -- REGISTRATION AND RECORDS DATA/DOCUMENTS, Continued

7. The immigration and Naturalization Service (INS) states that the school must keep a record used to comply with the reporting requirements for at least one year, Since many items included in foreign students' records are to be retained at least five years, it is recommended that INS documentation also be retained 5 years.