Policy Title: Student Recordkeeping
Functional Area: ADMINISTRATIVE

Status: Final
Effective: November 2017
Approved by: SOM Leadership Council
Policy Contact: Office of Admissions and Student Affairs
Office of Medical and Interprofessional Education
Responsible Office: Office of Admissions and Student Affairs
Office of Medical and Interprofessional Education
Last Reviewed/Updated: October 2020

**Purpose:** The purpose of this policy is to describe UIWSOM’s requirement of secure and confidential student recordkeeping.

**Policy Statement**

1) **Description**

   University of the Incarnate Word School of Osteopathic Medicine (UIWSOM) utilizes several databases and systems to record student information and secure documentation. The mechanism may vary by department, with limited and only appropriate access granted. All member of the UIWSOM community are responsible for maintaining student privacy and ensuring records are maintained according to Family Educational Rights and Privacy Act of 1974 (FERPA) regulations. The UIW FERPA policy can be found at https://my.uiw.edu/registrar/ferpa.html.

   UIWSOM faculty, staff, and administrators are required to complete annual FERPA training and stay abreast of all policies and procedures concerning maintaining the confidentiality of student records and FERPA. The Office of the Dean maintains training logs.

   University of the Incarnate Word maintains educational records for all current and former students who are officially enrolled. Student records at the university are subject to the provisions of the Family Educational Rights and Privacy Act of 1974, as amended. Students have the right to file a complaint with the U.S. Department of Education concerning compliance issues. The name and address of the appropriate office is: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202-5920.

2) **Primary goal(s)**

   To store student records and information in a secure method that ensures student privacy and secures access in accordance with FERPA policies.

3) **Participants**

   a) UIWSOM faculty, staff, and administrators (access granted to appropriate database and systems based on scope of responsibilities)
   b) UIW Office of the Registrar

4) **Resources**

   a) Blackboard – Learning Management System (LMS) used in MBS program
   b) AMP application portal – Web-based system used to manage applications, admission interviews, and admissions committee processes
   c) Banner – UIW integrated student information system which includes admissions, financial aid, records, student accounts, etc.
   d) eMedley – Comprehensive learning management system designed for health science programs
   e) SharePoint – Cloud-based service housing student information related to student affairs
   f) Smartsheet – Work execution platform
   g) File Maker – Cross-platform related database
   h) Grades First – Web-based student performance monitoring system
STUDENT RECORDKEEPING PROCEDURE

Student Recordkeeping
Purpose: The purpose of this document is to outline the procedure for maintaining accurate, confidential, and secure student records.

Policy Reference: University of the Incarnate Word School of Osteopathic Medicine (UIWSOM) utilizes a several databases and systems to record student information and secure documentation. Though the system or mechanism may vary by department, all members of the UIWSOM community are responsible for maintaining student privacy and ensuring records are maintained according to Family Educational Rights and Privacy Act of 1974 (FERPA) regulations. The UIW FERPA policy can be found at https://my.uiw.edu/registrar/ferpa.html.

Procedure for student recordkeeping

Departments within UIWSOM may utilize a preferred system such as Smartsheet, SharePoint, Banner, eMedley, and Blackboard for collecting, recording, and maintaining student notes, records, and documentation. The following procedures should be followed.

1) Online records
   a) Access should be limited to those with a legitimate educational interest and secured through employee credentials or password protected. SharePoint is used to store student records pertaining to the following:

   - Absence Requests & Documentation
     o Data in the category will relate to personal days, short-term absences, extended absences, and leaves of absence.
   - Residency Application
     o Data in this category will relate to a learner’s applications to residency programs.
   - Meeting Notes
     o Data in this category will relate to notes of formal and informal meetings between OASA administration and learners.
   - Miscellaneous
     o Data in this category will relate to information that does not meet the criteria for inclusion in any of the other categories in the student record.
   - Student Organizations
     o Data in this category will relate to issues pertaining to a learners’ involvement with any of the student organizations at UIWSOM.
• Phase I
  o Data in this category will relate to information pertaining to Units 1-10 and COMLEX Level 1
• Phase II
  o Data in this category will related to core clinical rotations, elective, and selective rotations, COMATs, and COMLEX Level 2
• SPC & Professionalism
  o Data in this category will relate to disciplinary action taken against a student from academic issues or professionalism.

Within the Office of Admissions & Student Affairs (OASA), the Dean of OASA and the Director of Student Affairs are deemed to have a legitimate purpose to access all aspects of a learner’s record. Those authoring the Medical Student Performance Evaluation (MSPE) are also deemed to have a legitimate right to access those portions of a student’s record that are pertinent to the drafting of the MSPE, namely data concerning the learner’s academic performance and professional behavior. Student Affairs Coordinators and the Student Affairs Administrative Assistant are deemed as having a legitimate purpose in accessing data that is considered Miscellaneous or that is related to a learner’s involvement in student organizations.

2) Paper records
   a) Physical documentation must be restricted to those with a legitimate educational interest and secured in a cabinet with a lock and key.

Procedure for FERPA training

1) New employees
   a) During the new employee onboarding process, FERPA training is provided through an online module on Blackboard.

2) Annually
   a) The Office of Registrar provides a yearly FERPA notice to the UIW community.
   b) UIWSOM requires that all faculty, staff, and administrators sign an annual agreement regarding confidentiality. Training logs are maintained by Office of the Dean.

3) As needed.
   a) To request access to the student information system, Banner, employees must sign a Banner Request Form which requires a signed agreement confirming the responsibility to respect and maintain the confidentiality of all records and information in which access is granted. Additionally, it is required to confirm that the need for student data is established by role and job duties.