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| <b>Effective Date:</b><br>01/2026 | <b>Student Records Retention and Management #401</b>                                                                                                                | <b>Pages:</b> 1 of 6            |
| <b>Reviewed:</b><br>01/2026       | <br><b>Tina Vanburen, DNP, MSN, RN, CNS</b><br><b>Director, School of Nursing</b> | <b>Administrative Committee</b> |

## PURPOSE

Student records are maintained in compliance with the Family Educational Rights and Privacy Act (FERPA) of 1974, the Pennsylvania State Board of Nursing, the Accreditation Commission for Education in Nursing (ACEN), Title IV federal student aid program requirements (34 CFR 668.24), and other appropriate State and Federal agencies.

## SCOPE

This policy applies to all student records maintained by the Joseph F. McCloskey School of Nursing, including applicant, enrolled student, financial aid, and health records.

## DEFINITIONS

**FERPA:** Family Educational Rights and Privacy Act of 1974

**FSA:** Federal Student Aid

**Separation from Program:** The date of graduation, withdrawal, or dismissal from the program

## POLICY

### Location of Records

All student records are maintained at the Joseph F. McCloskey School of Nursing, 700 Schuylkill Manor Road, Pottsville, PA 17901. Physical documents are stored in locked filing cabinets in the School's administrative offices. Electronic student records are maintained in the Populi Student Information System with restricted access to authorized personnel.

### Retention Schedules

*Permanent Retention (Maintained Indefinitely):* Official transcripts, final academic records (course grades, clinical grades, cumulative average, GPA), graduation records, diploma information, and credentials awarded.

*Three (3) Years After Last Attendance:* In accordance with 34 CFR 668.24, financial aid records and documentation (FAFSA, SAR/ISIR, award letters), documents related to borrower's eligibility and participation in federal student aid, documentation of FSA program fund receipt and disbursement, tuition payment records and account statements, and all other financial aid reports and forms. Exceptions: Perkins loan records are maintained until the loan is satisfied or documents are no longer needed to enforce the obligation; FISAP reports and supporting records are kept for three years from the end of the award year in which the report was submitted.

*Five (5) Years After Separation from Program:* Health and immunization records, background check and clearance documentation, and drug screening records.

*Two (2) Years:* Records of applicants accepted but not enrolled; records of rejected applicants.

## **PROCEDURE**

### **Initiation and Maintenance of Student Records**

***Applicant Records:*** The student record is initiated when an application is made. Applicant records are assembled by the Admissions Coordinator/Financial Aid Administrator. A summarization worksheet is developed for review by the Committee on Admissions, Promotions, and Graduation. The applicant record file contains: application, transcripts from previously attended institutions, transfer credit review, standardized test scores (TEAS, SAT), interview record, summarization worksheet, and correspondence to and from the applicant, including Letter of Intent to enroll or letter declining admission.

***Enrolled Student Records:*** Following acceptance to the Program, Academic Records are added, including: course grades and clinical grades, cumulative average and GPA, academic progression documentation, certificates of achievement, record of scholarships and other awards, letters of recognition, ATI assessment results, and dosage calculation and safe medication administration records.

***Compliance Documents:*** Record of Child Abuse Clearance, Pennsylvania Criminal Record Check, FBI Fingerprinting Screen, drug screening results, confidentiality statement, student agreement, acceptance of The Joseph F. McCloskey School of Nursing Rules and Regulations, FERPA acknowledgements, and FERPA directory non-disclosure form, if applicable.

***Clinical Records:*** A separate file is kept for clinical evaluations, including clinical performance evaluations, skills competency checklists, preceptor evaluations, and clinical placement documentation.

***Financial Aid Records:*** The Financial Aid Administrator initiates the financial aid record upon acceptance into the program. The file contains all materials pertinent to financial aid for the enrolled student, including but not limited to: Student Aid Report (SAR) or Institutional Student Information Record (ISIR), application data submitted to the Department of Education, documentation of student or parent borrower eligibility for FSA program funds, documentation relating to receipt of FSA program funds, grant, loan, or FWS award amounts and payment periods, disbursement records and payment of FWS wages, refunds/returns or overpayments, initial or exit loan counseling documentation, records used in FSA program participation, and FISAP reports and supporting records. Financial aid records are kept in a locked file in the Financial Aid Administrator's office and in electronic format in the student information system.

***Health Records:*** The student's health record is initiated following acceptance to the program. Health records are kept in the Student/Employee Health Nurse's files until graduation, withdrawal, or dismissal from the program. At that time, it is added to the individual's academic file and kept in a locked filing cabinet in the School's administrative offices. The health record file includes: admission history and physical examination, immunization and titration records, TB screening (PPD or QuantiFERON), annual health updates, and other pertinent health-related information.

### **Access to Student Records**

***Student Access Rights:*** A student may review their educational record upon written request. A School official shall be present during the examination to interpret the meaning and implications of the records involved. An appointment time will be scheduled within 45 days of the request. The student is entitled to copies of the contents of their record file. A \$5 per-page copying fee will be charged.

In accordance with FERPA, students have the right to: inspect and review their educational records; request amendment of records believed to be inaccurate or misleading; consent to disclosure of personally identifiable information, except as permitted by FERPA; and file a complaint with the U.S. Department of Education concerning alleged failures to comply with FERPA.

*Third-Party Access:* The Family Educational Rights and Privacy Act of 1974 stipulate limitations on the release of information to other individuals. Student records will not be released to third parties without written consent from the student, except as permitted under FERPA, including: school officials with legitimate educational interest; officials of other schools where the student seeks enrollment; authorized representatives of federal or state education authorities; organizations conducting accreditation activities (ACEN site visitors); appropriate parties in connection with financial aid; court orders or lawfully issued subpoenas; and appropriate officials in cases of health or safety emergencies.

People involved with the approval and accreditation of the School of Nursing may access student records. Verification and confirmation of immunizations, PPDs, drug screens, and clearances may be released to authorized officials by health care agencies used for clinical experiences.

### **Transcript Requests**

Students may request official transcripts by submitting a written request to the School of Nursing. A processing fee of [insert amount] is charged for each official transcript. Transcripts are not released if the student has outstanding financial obligations to the institution. Official transcripts are sealed and sent directly to the designated recipient. Electronic transcripts may be provided through secure transmission methods. Unofficial transcripts may be requested for personal use at no charge and are clearly marked as "Unofficial."

### **Record Security**

*Physical Security:* Student records are stored in locked filing cabinets in secure areas. Access to record storage areas is limited to authorized personnel. Keys and access codes are restricted to designated staff members. Records are protected from fire, water damage, and unauthorized access.

*Electronic Security:* Electronic student records are maintained in the Populi Student Information System. Access to electronic records requires unique login credentials. System access is role-based and limited to job responsibilities. Regular backups are performed to prevent data loss. Electronic records are encrypted and password-protected.

### **Record Disposal**

Records that have exceeded their retention period are disposed of securely. Paper records are shredded or destroyed to prevent reconstruction. Electronic records are permanently deleted with overwrite procedures to prevent recovery. Permanent records (official transcripts, graduation records, diploma information, and credentials awarded) are never destroyed.

### **Custody of Records**

Should the School close, the Lehigh Valley Health Network shall be responsible for the safekeeping of all students' records. Official copies shall be made available upon written request of the graduate or former student. Should Lehigh Valley Health Network close, the Pennsylvania State Board of Nursing will provide guidance on the permanent safekeeping and availability of the School's records. The Pennsylvania State Board of Nursing will be informed, in writing, of final decisions regarding the permanent placement of School records.

## **REFERENCES**

Family Educational Rights and Privacy Act (FERPA) of 1974  
34 CFR 668.24 (Title IV Federal Student Aid Program Requirements)  
Pennsylvania State Board of Nursing Regulations  
ACEN Accreditation Standards

## **REVIEW and APPROVAL: Administrative Committee**