
Policy Name: Records Management
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Title of Policy Owner: Dean of Administration
Policy Type: RHEI/Shared Services BSMCON SOMI SOMI
Approved by: RHEI Leadership Team
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Policy Status: Approved

I. Policy

It is the policy of Bon Secours St. Mary's School of Medical Imaging (SOMI) that all records (as defined below) are the property of the School and neither the personal property nor the property of a specific school, department, division, unit, institute or center, that such records are maintained in accordance with all applicable laws and regulations, the requirements of accrediting and other external agencies, and the standards and procedure prescribed herein, and that records that are no longer needed or of no value are discarded or disposed of as specified in this policy.

II. Purpose

The purpose of this policy is to ensure the integrity, confidentiality, and security of all documents and records created, received, or maintained in the course of institutional business, protect the interests of faculty, employees, students of SOMI, facilitate appropriate access to such documents, and records, and inform all SOMI faculty, associates and administrators of the standards, requirements, and responsibilities for the management, retention and disposition of all SOMI records.

III. Scope

This policy applies to all associates and students of SOMI as defined herein.

IV. Definitions

The term "record" under this policy means all documents and files, whether written, electronic or recorded matter regardless of its physical form or characteristics, that are created, produced, received or maintained by faculty, employees or components of the School during their activities for or on behalf of the School or in the transaction of School business. Records may also include documents that were acquired by the School as the result of a business acquisition or by written agreement to serve as custodian. Examples include, but are not limited to, academic files, administrative files, student files, financial and accounting records, correspondence, letters, memoranda, forms, charts, reports, maps and drawings, plans, photographs and films, spreadsheets, computer records, microfilm and microfiche, electronic files, electronic mail, data processing output in media, video and audio recordings, and micrographics or any digitization magnetic tape or other electronic storage of any of these things. This policy does not apply to non-records which include preliminary

drafts not circulated for comment, duplicate copies of correspondence, duplicate copies of records used for short-term reference purposes, blank forms, stocks of publications, magazines, publications from professional organizations, newspapers, public telephone directories, electronic mail ("e-mail) created during incidental use and transitory messages such as voice mail, telephone messages, self-sticking notes and other messages which are used primarily for the informal communication of information.

Active records are defined as information that is regularly accessed while students are enrolled.

Inactive records are those which are rarely accessed and, if not electronic, may be stored at a secured off-site storage. Records custodians should retain detailed storage information of documents stored offsite in order to retrieve them on demand or at the end of the retention period, at which time the custodian is responsible for disposal of those specific records.

Fiscal Year: The January 1 – December 31 period delimiting the beginning and ending dates for reporting annual financial data for the School.

V. Policy Details

RESPONSIBILITIES

All School personnel are responsible for ensuring that all records are created, used, maintained, preserved, and disposed of in accordance with this policy. Electronic records are to be managed consistent with the requirements for traditional records in compliance with this policy. Records containing confidential and proprietary information shall be securely maintained, controlled, and protected to prevent unauthorized access. The unauthorized use, removal, or destruction of School records is prohibited. No School record or document may be falsified or inappropriately altered in any manner. Information pertaining to the unauthorized use, removal, or destruction of the School's records or regarding falsifying or inappropriately altering information in a School record should be reported directly to the Campus Director and Dean of Academic Affairs of the School.

All School records shall be retained in a readable format regardless of changes in technology or equipment obsolescence. Printing documents and saving to a file, maintaining old equipment and software applications, or converting records to new technology, may meet this requirement. Electronic mail ("e-mail"), i.e., is subject to this policy. E-mail senders (originators) are responsible for retaining messages and documents relating to the transaction of School business in compliance with the attached Records Management Schedule. E-mails may be retained in electronic form or printed.

Each functional area of the School shall have a designated records custodian responsible for implementing records management practices consistent with this policy, establishing and monitoring the level of confidentiality and security appropriate for specific types of records, educating staff in understanding records management practices, preserving records of legal, fiscal, or administrative value, and destroying inactive records upon expiration of the established record retention

period. Custodians are responsible for reviewing Records Management Schedule annually and informing the School's administration of any necessary changes. In the event of School closure or revocation of certification in Virginia, the School will contract with another institution or records management company to arrange for preservation and access to its academic records to the public based on defined criteria. The School will also notify the State Council of Higher Education for Virginia (SCHEV) of its preservation plans in a timely manner.

RECORDS MANAGEMENT SCHEDULE

The Records Management Schedule (Appendix) lists the School's significant academic and business records and their corresponding minimum retention period. The Schedule applies to all School documents effective August 2010, signature dates may vary. In most cases, state or federal law determines the period for which specific records must be maintained, regardless of their active or inactive status. Where there are no legal requirements, the School will apply professional standards dictating best practices for records management.

RECORD DISPOSAL

Records that have satisfied their legal, fiscal, administrative, and archival requirements are to be disposed of or destroyed in accordance with the Records Management Schedule (see Appendix). Records must be destroyed in a manner that ensures the confidentiality of the records and renders the information no longer readable and recognizable as School records prior to disposal. The approved methods to dispose records include, but are not limited to, recycling, shredding, burning, pulping, pulverizing, and magnetizing. Written documentation of such disposal shall be kept and maintained by the designated records custodian. Deletion of confidential or privacy-protected information in computer files or other electronic storage media is not acceptable. Electronic records must be "wiped" clean or the storage media physically destroyed by or under the direction of Bon Secours Information Services (or by its designee). These methods of destruction are specified so that records may not be viewed or used by unauthorized persons after they are disposed.

LITIGATION HOLDS

Where the School has information regarding current, pending, threatened litigation or governmental investigation, it has the obligation to take steps to preserve documents that might be implicated in such litigation or investigation. In such event, the School is under legal obligation to preserve all relevant records pertaining to the issues and will take steps to identify all paper and digitally maintained files (including e-mail and computer accounts of separated employees) that may contain information relevant to the case. The School's Campus Director and Dean of Academic Affairs will notify appropriate personnel to preserve such documents indefinitely until receiving a written release by the Campus Director and Dean of Academic Affairs. In the event of a litigation hold, all policies for the disposition of documents must be suspended for the subject of the hold. Failure to preserve documents after having received a preservation notice can have extremely serious consequences for the School. This hold includes the preservation of electronic media and obligates the School to copy and preserve emails and computer hard drives of involved personnel for future forensic investigation. Accordingly, failure to comply with a litigation hold will be

deemed misconduct and will subject personnel to disciplinary action, up to and including dismissal, as well as personal liability for civil and/or criminal sanctions by the courts or law enforcement agencies.

VI. Attachments

Appendix II

VII. Related Policies

None

VIII. Disclaimers

Nothing in this policy creates a contractual relationship between Bon Secours Memorial School of Academic Affairs (SOMI) and any party. SOMI, in its sole discretions, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

IX. Version Control

Version	Date	Description	Prepared by
1.0	4/13/2020	Revisions and new template	Dean of Administration
2.0	2/23/2022	Revisions	Dean of Administration
2.0	2/5/2024	Reviewed – No Changes	Dean of Administration



ADM 1.04 APPENDIX I – RECORDS MANAGEMENT SCHEDULE

Custodians “Owners” are identified for each area, with exceptions noted.

TABLE 1: ADMISSIONS RECORDS FOR APPLICANTS WHO ENROLL			
<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Admission Documents	Associate Dean of Student Services	Notices of Admission, correspondence, waivers, recommendations	3 years after end of fiscal year during which student was last enrolled
Enrollment agreement	Associate Dean of Student Services	Signed enrollment agreement	3 years after end of fiscal year during which student was last enrolled
Credit by Examination	Associate Dean of Student Services	Advanced Placement, CLEP, IB	3 years after end of fiscal year during which student was last enrolled
Entrance Exam	Associate Dean of Student Services	ACT, SAT, TEAS	3 years after end of fiscal year during which student was last enrolled
Transcripts	Associate Dean of Student Services	High School, College	3 years after end of fiscal year during which student was last enrolled
Medical Records	Associate Dean of Academic Affairs	Castlebranch	Permanent
Military Documents	Associate Dean of Student Services	Veterans	3 years after end of fiscal year during which student was last enrolled
Application	Associate Dean of Student Services	Admission application	1 year

TABLE 2: ADMISSIONS RECORDS FOR APPLICANTS WHO DO NOT ENROLL			
<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Admission Documents	Associate Dean of Student Services	Notices of Admission, correspondence,	1 year



Credit by Examination	Associate Dean of Student Services	waivers, recommendations Advanced Placement, CLEP, IB	1 year
Entrance Exam	Associate Dean of Student Services	ACT, SAT, TEAS	1 year
Transcripts	Associate Dean of Student Services	High School, College	1 year
Military Documents	Associate Dean of Student Services	Veterans	1 year
Application	Associate Dean of Student Services	Admission application	1 year

TABLE 3: ACADEMIC RECORDS

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Academic Advising	Director of Student Success	Plan of Study	3 years after end of fiscal year during which student was last enrolled
Academic Notices	Director of Records and Registration	Warning, Probation, Dismissal	3 years after end of fiscal year during which student was last enrolled
Academic Integrity Violation	Dean of Student Affairs	Honor Code	Permanent
Disciplinary Action	Dean of Student Affairs	Notice related to personal conduct	3 years after end of fiscal year during which student was last enrolled
Official Transcripts	Director of Records and Registration		Permanent
Leave of Absence	Director of Records and Registration	Standard Period of Non Enrollment (SPN)	3 years after end of fiscal year during which student was last enrolled
Academic Correspondence	Director of Records and Registration	Related to Academic Record Inquiry, course waivers	3 years after end of fiscal year during which student was last enrolled
Non-Academic Grievance	Dean of Student Affairs	FERPA disputes/complaint	Until administrative need is satisfied
Academic Grievance	Dean of Academic Affairs	FERPA disputes/complaint	Until administrative need is satisfied



Name Change	Director of Records and Registration	Authorization to change name	Until administrative need is satisfied
Personal Data Form	Director of Records and Registration	Change of address, ethnicity, etc.	Until administrative need is satisfied
Transfer Credit Evaluations	Director of Records and Registration	Complies with higher education opportunity act	3 years after end of fiscal year during which student was last enrolled
Registration and Enrollment	Director of Records and Registration	Class Schedules, lists, enrollment changes, withdrawals, course repeat, attendance	Until administrative need is satisfied
FERPA	Director of Records and Registration	Waivers for rights of access, opt out of directory information	Permanent

TABLE 4: DEGREE AND CERTIFICATE RECORDS

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Intent to Graduate Form	Director of Records and Registration	Degree Application	3 years after end of fiscal year during which student was last enrolled
Degree Audit Records	Director of Records and Registration	Degree Audit to support graduation	3 years after end of fiscal year during which student was last enrolled
Graduation Lists	Director of Records and Registration		Permanent
Waivers/Substitution	Director of Records and Registration	Approvals to meet program requirements	Until administrative need is satisfied

TABLE 5: GRADE AND COURSE RECORDS

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Exams, Graded course work	Associate Dean of Faculty Affairs and Distance Education	LMS/Blackboard	1 year after course completion
Grade Appeal	Dean of Academic Affairs	Student final grade disputes	1 year after course completion



Grade Book	Associate Dean of Academic Affairs	Record of Student in course and work completed. LMS/Blackboard	5 years after course completion
Placement documentation	Dean of Academic Affairs	Internal clinical experiences, placement activity	3 years after end of fiscal year during which student was last enrolled
Grade Change Forms	Director of Records and Registration	Record of authorized grade change	Until administrative need is satisfied
Grade Data	Director of Records and Registration	Official record of grades	Permanent
Course Syllabi	Dean of Academic Affairs		Permanent
Course Calendar	Dean of Academic Affairs		1 year after course completion
Text Book Information	Dean of Academic Affairs	Complies with high education opportunity act	3 years after end of fiscal year during which student was last enrolled

TABLE 6: STUDENT RECORD ELECTRONIC DATA

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Data change logs	Director of Information Technology	Electronic log of changes to enrollment and other data	10 years
Email data information	Director of Information Technology	Emails and other electronic communications	Until administrative need is satisfied
Enrollment Data	Director of Information Technology	Electronic record of enrollment	10 years
Grade Data	Director of Information Technology	Electronic record of submitted grades	Permanent
Student Demographic Information	Director of Information Technology and Dean of Administration	Electronic student data related to date of birth, address, student characteristics	50 years

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TABLE 7: PUBLICATIONS, STATISTICAL DATA, AND INSTITUTIONAL REPORTS

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<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Catalog	Director of Marketing and Communications	Published Annually	Permanent
Commencement Programs	Director of Marketing and Communications	Published record of graduates	Permanent
Degree Statistics	Dean of Administration	Record of Degrees Granted	Permanent
Enrollment Statistics	Dean of Administration and Registrar	Report of enrolled students by class	Permanent
Graduation Rates	Dean of Administration	Student Right to Know Legislation	3 years after end of fiscal year during which student was last enrolled
Race, ethnicity	Dean of Administration	Report of student enrollment	Permanent
Instructor Evaluations	Dean of Academic Affairs		1 semester

TABLE 8: FEDERAL DISCLOSURE RECORDS

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Accreditation	Dean of Academic Affairs and Dean of Administration	Institutional Accreditation	Permanent
Accreditation	Dean of Academic Affairs	Program Accreditation	Permanent
Crime Statistics/Security Reports	Dean of Administration	Complies with Clery Act	7 years

TABLE 9: FINANCE

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
Program Records	Chief Financial Officer	Audit and review reports and institution responses	7 years from award year end
Program Records	Chief Financial Officer	Other records pertaining to financial responsibility and standards of administrative capability	7 years from award year end



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Program Records	Chief Financial Officer	Program Participation Agreement	7 years from award year end
Program Records	Chief Financial Officer	State agency reports relating to financial aid	7 years from award year end
Fiscal Records	Chief Financial Officer	Bank statements for accounts containing Student Financial Aid funds (SFA)	7 years from award year end
Fiscal Records	Chief Financial Officer	Federal Work Study Payroll Records	7 years from award year end
Fiscal Records	Chief Financial Officer	Ledgers identifying Student Financial Aid funds (SFA) transactions	7 years from award year end
Fiscal Records	Chief Financial Officer	Records of Student Financial Aid funds (SFA) program transactions	7 years from award year end
Fiscal Records	Chief Financial Officer	Records of student accounts	7 years from award year end
Fiscal Records	Chief Financial Officer	Records supporting data on required reports	7 years from award year end
Recipient Records	Chief Financial Officer	Data used to establish student's admission, enrollment status, period of enrollment	7 years from award year end
Recipient Records	Chief Financial Officer	Date and amount of disbursements	7 years from award year end
Recipient Records	Chief Financial Officer	Documentation of initial or exit loan counseling	7 years from award year end
Recipient Records	Chief Financial Officer	Documentation of student eligibility	7 years from award year end
Recipient Records	Chief Financial Officer	Documentation of student's program of study and enrolled courses	7 years from award year end
Recipient Records	Chief Financial Officer	Documentation of student's satisfactory academic progress	7 years from award year end
Recipient Records	Chief Financial Officer	Documentation related to the	7 years from award year end



		receipt of aid, such as amount of grant, loan, federal work study award, and calculations used to determine aid amounts	
Recipient Records	Chief Financial Officer	Documentation used to verify selected financial aid applicant data	7 years from award year end
Recipient Records	Chief Financial Officer	Financial aid history for transfer students	7 years from award year end
Recipient Records	Chief Financial Officer	Reports and forms used for participation in student financial aid program	7 years from award year end
Recipient Records	Chief Financial Officer	Student aid report (SAR) or Institutional Student Information Record (ISIR)	7 years from award year end
Requirements for specific aid	Chief Financial Officer	Borrowers' eligibility records	7 years from award year end
Requirements for specific aid	Chief Financial Officer	Campus-based aid (Perkins loan, SEOG, and federal work study	7 years from award year end

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