TITLE OF POLICY
Student Records: Confidentiality, Retention and Access

PURPOSE AND SCOPE
The purpose of this policy is to define the confidentiality of student records and outline both the retention timeline and the process wherein a student can request access.

RESPONSIBLE PARTY AND REVIEW CYCLE
The Education Committee will review and approve the policy in odd-numbered years or as needed.

LCME REFERENCE(S)
LCME 11.5: Confidentiality of Student Educational Records
LCME 11.6: Retention of and Access to Student Records

HISTORY OF APPROVALS AND UPDATES
Approved by Education Committee March 2019

DEFINITION(S)
This policy is designed to comply with the provisions of the Family Educational Rights and Privacy Act (FERPA) of 1974, 20 U.S.C. Sec. 1232g and with the University’s policies for the use of human subjects in research as monitored by the Office of Research Administration.

Student academic records: comprised of the admissions packet folder (AMCAS application, all pre-medical school transcripts, UNC acceptance letter, UNC policy agreements (i.e. Community Standards, Technical Standards, Confidentiality Statement), internal scheduling folder (i.e. elective request forms, add/drop forms), academic performance (course grades and narrative comments), and financial aid folder (i.e. E-mail correspondences to revise financial aid, documents related to FAFSA, scholarship information). Academic records do not include any student health information.

POLICY
Confidentiality of Student Records
Academic records are confidential and available only to those members of faculty and administration with a need to know, unless released by the student or release is mandated by a governing authority.
Certain medical school officials have a legitimate educational interest and have full access to the academic record without student consent:

- Dean of the School of Medicine
- Executive Dean for School of Medicine
- Executive Vice Dean for Education
- Senior Associate Dean for Medical Student Education
- Associate Dean for Student Affairs
- Assistant Dean for Student Affairs
- Senior Director of Academic Affairs
- Director of Student Affairs
- School of Medicine Registrar
- Academic Advisors (limited to the student(s) assigned to the individual)
- Director of MD/PhD Program (limited to all MD/PhD students)
- Office of Academic Excellence
  - Director of the Office of Academic Excellence
  - Director of Learning Innovations
  - Foundation Phase Academic Coaches
  - Director of Academic Assistance
  - Clinical Academic Resource Directors
- Members of the Student Progress Committee (as needed)
- Regional Campus Assistant Deans

In addition, certain medical school officials have a legitimate educational interest and have partial access to the academic record. Annually, we audit access levels to ensure they are appropriate as roles shift.

- Director of Evaluation
- School of Medicine IT Student Systems Support Specialists
- School of Medicine Office of Financial Aid
- Financial Aid Officer
- Financial Aid Counselors
- School of Medicine Office of Admissions
- Associate Dean for Admissions
- Director of Admissions
- Admissions Representative
- School of Medicine Assistant Registrars
- Office of Global Health Education
- International and Visiting Student Coordinator
- MSPE Staff Writer
- Accreditation Project Manager
- Course Support Staff
  - Assistant Directors of Academic Affairs
  - Foundation Phase Course Coordinators
  - Application Phase Course Coordinators
Individualization Phase Course Coordinators

Paper copies of student records are kept in locked file cabinets. Digital files are housed in University-approved, ONYEN-protected educational management services. (What is kept in paper form and what is electronic?)

Health information records are maintained in CERTIPHI and the student Campus Health Services office, neither of which is accessible to Office of Student Affairs personnel.

Retention of and Access to Student Records
Student academic records are maintained by the SOM in paper or digital forms from matriculation onward. Students can request access to or release of their academic records by submitting a form to the SOM Registrar.

Individuals other than the student and those listed above requesting access to a student record must contact the SOM Registrar’s Office. Student permission will be obtained before the record is released.

PROCEDURE(S)
The form to request record access can be found here: https://www.med.unc.edu/ome/registrar/request-for-release-of-information/. Requests will be completed within 3-5 business days.

Students are able to access their transcripts that contain grades for all coursework completed.

Students who matriculated into the School of Medicine before Fall 2014 will request their transcripts from the Office of Student Affairs in the School of Medicine, using the form linked above.

Students who matriculated into the School of Medicine after Fall 2014 will request their transcript from the University Registrar (https://registrar.unc.edu/academic-services/transcripts-certifications/).

For faculty and staff, access is granted to the following systems by the specified methods:

One45 User Access
One45 contains student and course evaluations, grades, schedules and clinical log.
Access granted by: Director of Evaluation.
Audited: Annually
Process: Users are added to the appropriate part of the system by request. Unrecognized persons who request access are verified. When a user has left the School of Medicine, their ONYEN association is no longer active and their permissions are transferred to their replacement or their permissions are put into a “PermissionsDump” account that has no user access associated with it.

PulseConnect Access
PulseConnect is an in-house database that captures biographical information, grades, leave of absence, registration, and transcripts for students who matriculated prior to Fall 2014.
Access granted by: Director of Student Affairs, PulseConnect IT team
Audited: Annually
Process for a person to gain access to these systems the following needs to take place:
1. A formal request from head of department and/or supervisor requesting access to the system desired.
2. PulseConnect Director/manager review request and ask questions to find out what purpose is the access for.
3. After this review, the request is approved or denied based on the review.
4. If approved, we request person’s onyen, and email to add them to appropriate system for access.

ConnectCarolina Access
Access granted by UNC Main Campus Registrar’s Office
Access authorized by: Director of Student Affairs and School of Medicine Registrar
Audited: Annually
Process: Users request access from the SOM Registrar. SOM Registrar provides access forms, which are completed by user with input from SOM Registrar. Director of Student Affairs reviews and signs the form. Forms are routed to SOM Access Request Coordinator (ARC). SOM ARC routes forms to the main campus Registrar’s Office for final approval.