

**Policy Name:** Records Management  
**Policy Number:** ADM 1.04  
**Title of Policy Owner:** Dean of Administration  
**Policy Type:** RHEI/Shared Services BSMCON SCHS SOMI  
**Approved by:** RHEI Leadership Team  
**Effective Date:** 8/1/2024  
**Version:** 2.1  
**Policy Status:** Approved

## I. Policy

It is the policy of Bon Secours Memorial College of Nursing (BSMCON) that all records (as defined below) are the property of the College 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 BSMCON, facilitate appropriate access to such documents, and records, and inform all BSMCON faculty, associates and administrators of the standards, requirements, and responsibilities for the management, retention and disposition of all BSMCON records.

## III. Scope

This policy applies to all associates and students of BSMCON 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 College during their activities for or on behalf of the College or in the transaction of College business. Records may also include documents that were acquired by the College 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 College.

## **V. Policy Details**

### **RESPONSIBILITIES**

All College 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 College records is prohibited. No College record or document may be falsified or inappropriately altered in any manner. Information pertaining to the unauthorized use, removal, or destruction of the College's records or regarding falsifying or inappropriately altering information in a College record should be reported directly to the Campus Director and Dean of Academic Affairs of the College.

All College 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 College business in compliance with the attached Records Management Schedule. E-mails may be retained in electronic form or printed.

Each functional area of the College 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 College's administration of any necessary changes. In the event of College closure or revocation of certification in Virginia, the College 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 College 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 College's significant academic and business records and their corresponding minimum retention period. The Schedule applies to all College 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 College 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 College 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 College 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 College 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 College'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 College. This hold includes the preservation of electronic media and obligates the College 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 College of Academic Affairs (BSMCON) and any party. BSMCON, 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.

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

<b>TABLE 2: ADMISSIONS RECORDS FOR APPLICANTS WHO DO NOT ENROLL</b>			
<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>

<b>Admission Documents</b>	Associate Dean of Student Services	Notices of Admission, correspondence, waivers, recommendations	1 year
<b>Credit by Examination</b>	Associate Dean of Student Services	Advanced Placement, CLEP, IB	1 year
<b>Entrance Exam</b>	Associate Dean of Student Services	ACT, SAT, TEAS	1 year
<b>Transcripts</b>	Associate Dean of Student Services	High School, College	1 year
<b>Military Documents</b>	Associate Dean of Student Services	Veterans	1 year
<b>Application</b>	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>
<b>Academic Advising</b>	Director of Student Success	Plan of Study	3 years after end of fiscal year during which student was last enrolled
<b>Academic Notices</b>	Director of Records and Registration	Warning, Probation, Dismissal	3 years after end of fiscal year during which student was last enrolled
<b>Academic Integrity Violation</b>	Dean of Student Affairs	Honor Code	Permanent
<b>Disciplinary Action</b>	Dean of Student Affairs	Notice related to personal conduct	3 years after end of fiscal year during which student was last enrolled
<b>Official Transcripts</b>	Director of Records and Registration		Permanent
<b>Leave of Absence</b>	Director of Records and Registration	Standard Period of Non Enrollment (SPN)	3 years after end of fiscal year during which student was last enrolled
<b>Academic Correspondence</b>	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

<b>Non-Academic Grievance</b>	Dean of Student Affairs	FERPA disputes/complaint	Until administrative need is satisfied
<b>Academic Grievance</b>	Dean of Academic Affairs	FERPA disputes/complaint	Until administrative need is satisfied
<b>Name Change</b>	Director of Records and Registration	Authorization to change name	Until administrative need is satisfied
<b>Personal Data Form</b>	Director of Records and Registration	Change of address, ethnicity, etc.	Until administrative need is satisfied
<b>Transfer Credit Evaluations</b>	Director of Records and Registration	Complies with higher education opportunity act	3 years after end of fiscal year during which student was last enrolled
<b>Registration and Enrollment</b>	Director of Records and Registration	Class Schedules, lists, enrollment changes, withdrawals, course repeat, attendance	Until administrative need is satisfied
<b>FERPA</b>	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>
<b>Intent to Graduate Form</b>	Director of Records and Registration	Degree Application	3 years after end of fiscal year during which student was last enrolled
<b>Degree Audit Records</b>	Director of Records and Registration	Degree Audit to support graduation	3 years after end of fiscal year during which student was last enrolled
<b>Graduation Lists</b>	Director of Records and Registration		Permanent
<b>Waivers/Substitution</b>	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>
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<b>Exams, Graded course work</b>	Associate Dean of Faculty Affairs and Distance Education	LMS/Blackboard	1 year after course completion
<b>Grade Appeal</b>	Dean of Academic Affairs	Student final grade disputes	1 year after course completion
<b>Grade Book</b>	Associate Dean of Academic Affairs	Record of Student in course and work completed. LMS/Blackboard	5 years after course completion
<b>Placement documentation</b>	Dean of Academic Affairs	Internal clinical experiences, placement activity	3 years after end of fiscal year during which student was last enrolled
<b>Grade Change Forms</b>	Director of Records and Registration	Record of authorized grade change	Until administrative need is satisfied
<b>Grade Data</b>	Director of Records and Registration	Official record of grades	Permanent
<b>Course Syllabi</b>	Dean of Academic Affairs		Permanent
<b>Course Calendar</b>	Dean of Academic Affairs		1 year after course completion
<b>Text Book Information</b>	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>
<b>Data change logs</b>	Director of Information Technology	Electronic log of changes to enrollment and other data	10 years
<b>Email data information</b>	Director of Information Technology	Emails and other electronic communications	Until administrative need is satisfied
<b>Enrollment Data</b>	Director of Information Technology	Electronic record of enrollment	10 years
<b>Grade Data</b>	Director of Information Technology	Electronic record of submitted grades	Permanent



<b>Student Demographic Information</b>	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**

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

**TABLE 8: FEDERAL DISCLOSURE RECORDS**

<i>Area</i>	<i>Owner</i>	<i>Record</i>	<i>Retention Period</i>
<b>Accreditation</b>	Dean of Academic Affairs and Dean of Administration	Institutional Accreditation	Permanent
<b>Accreditation</b>	Dean of Academic Affairs	Program Accreditation	Permanent
<b>Crime Statistics/Security Reports</b>	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>
<b>Program Records</b>	Chief Financial Officer	Audit and review reports and	7 years from award year end

		institution responses	
<b>Program Records</b>	Chief Financial Officer	Other records pertaining to financial responsibility and standards of administrative capability	7 years from award year end
<b>Program Records</b>	Chief Financial Officer	Program Participation Agreement	7 years from award year end
<b>Program Records</b>	Chief Financial Officer	State agency reports relating to financial aid	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Bank statements for accounts containing Student Financial Aid funds (SFA)	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Federal Work Study Payroll Records	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Ledgers identifying Student Financial Aid funds (SFA) transactions	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Records of Student Financial Aid funds (SFA) program transactions	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Records of student accounts	7 years from award year end
<b>Fiscal Records</b>	Chief Financial Officer	Records supporting data on required reports	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Data used to establish student's admission, enrollment status, period of enrollment	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Date and amount of disbursements	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Documentation of initial or exit loan counseling	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Documentation of student eligibility	7 years from award year end

<b>Recipient Records</b>	Chief Financial Officer	Documentation of student's program of study and enrolled courses	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Documentation of student's satisfactory academic progress	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Documentation related to the receipt of aid, such as amount of grant, loan, federal work study award, and calculations used to determine aid amounts	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Documentation used to verify selected financial aid applicant data	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Financial aid history for transfer students	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Reports and forms used for participation in student financial aid program	7 years from award year end
<b>Recipient Records</b>	Chief Financial Officer	Student aid report (SAR) or Institutional Student Information Record (ISIR)	7 years from award year end
<b>Requirements for specific aid</b>	Chief Financial Officer	Borrowers' eligibility records	7 years from award year end
<b>Requirements for specific aid</b>	Chief Financial Officer	Campus-based aid (Perkins loan, SEOG, and federal work study)	7 years from award year end
<b>Requirements for specific aid</b>	Chief Financial Officer	FFEL and Direct Loans	7 years from award year end
<b>Requirements for specific aid</b>	Chief Financial Officer	Fiscal operations report (FISAP)	7 years from award year end
<b>Requirements for specific aid</b>	Chief Financial Officer	Pell Grant	7 years from award year end

<b>Requirements for specific aid</b>	Chief Financial Officer	Perkins original promissory notes	Until loan is satisfied or documents are needed to enforce obligation
<b>Requirements for specific aid</b>	Chief Financial Officer	Perkins repayment records	7 years from date loan assigned, cancelled, or repaid

*Accrediting Bureau of Health Education Schools (2024).*

*Accreditation Manual, 19<sup>th</sup> Edition. North Bethesda, MD.*

*American Association of Collegiate Registrars and Admissions Officers (2013). AACRAO's Student Records Management: Retention, Disposal, and Archive of Student Records Washington, DC: AACRAO.*

*State Council of Higher Education (2022).*

*Regulations Governing Certification of Certain Institutions to Confer Degree, Diplomas and Certificates. Richmond, VA.*

*U. S. Department of Education (2021-2022). Record Keeping, Privacy, and Electronic Processes: Federal Student Aid Student Financial Aid Handbook. Washington, DC: U.S. Department of Education.*