Retention of Student Education Records

Effective Date: January 1, 2017

Policy Statement

This policy describes University and School/Department responsibilities for the retention of, access to, and disposal of student education records.

Reason(s) for the Policy

Columbia University assigns responsibilities to the Office of the University Registrar and to the various Schools and Departments for the collection, handling, and disposition of student education records. The Office of the University Registrar has a three-tiered approach to data retention: preventing the creation of bad data, maintaining a process to quarantine bad or obsolete data, and securing good data.

Responsible University Office & Officer

Office of the University Registrar

Who is governed by This Policy

Any University employee who is responsible for the retention of student education records

Who Should Know This Policy

Any University employee who is responsible for the retention of student education records

Policy Text

1. POLICY

1.1 Transcripts

Transcripts of Columbia University students and alumni/ae are issued by the Office of the University Registrar when requests are submitted in writing by the student or alumnus/a or via Student Services On-Line (SSOL). The University reserves the right to withhold transcripts and other similar records when students have unmet obligations to the university, particularly unmet financial obligations. Provision of official transcript is included in the Document Fee charged at the start of the first semester of enrollment.

1.2 Certification of Enrollment and Degrees
Using SSOL, current students are able to access official enrollment certifications through a self-service tool. In addition, the Office of the University Registrar supplies an academic certification which is an official document verifying dates of attendance, student status (full-time or part-time) by semester, and award of degree upon written request. The academic certification is typically requested for health insurance, visa, employment, or credit verification purposes. Provision of certification of enrollment and degrees is included in the Document Fee charged at the start of the first semester of enrollment.

The Office of the University Registrar contracts with the National Student Clearinghouse as Columbia University’s official third-party provider of academic certifications, including both enrollment and degree verifications. The expectation is that all academic certifications for both current and former students requested by parties external to the University will be processed by the National Student Clearinghouse.

In order to be considered for a degree or certificate, students must file an application with their school or program. Provision of diplomas is included in the Document Fee assessed at the start of the first semester of enrollment. Diplomas are ordered by the Registrar’s Office and mailed by the vendor after the conferral date.

1.3 Registrar’s Office Files

Beyond transcripts and certifications, the Office of the University Registrar does not maintain School or Department student records.

1.4 School/Department Files

School/Department student records may contain important documents that chart the student’s progress or lack of progress toward the degree. Schools and Departments are encouraged to keep complete records for students and to establish regular schedules for secure file destruction (see 1.6, below). Usually, retention of the complete file is recommended for five years after the student leaves the University. If a student leaves the university without graduating (i.e., failure to register, voluntary termination, dismissal, or expulsion), retention of the complete file is recommended for a period of ten years.

1.5 Access to Student/Applicant Files

Students who enroll at Columbia have the right to review education records in their student files (whether these are maintained at the Registrar, School, or Department level), or that are kept elsewhere about them by the University. The information is available only to the student for review while actively enrolled or anytime thereafter. This right is guaranteed by the federal Family Educational Rights and Privacy Act of 1974, otherwise known as the Buckley Amendment.
A Columbia employee may keep letters or notes about a student in that employee’s personal files. These records are not accessible to the student as long as (as a general proposition) they are not shared by the employee with anyone else. Also known as “sole possession” records, they are not defined as part of the education record and are not therefore required to be released to a student under FERPA regulations governing access. Items to which a student has explicitly signed a waiver of access - such as letters of recommendation for admission, a job, an award, or honor - should be kept separately from the student’s file and are also not required to be released to a student in the event of a request for access to the education record under FERPA.

For more information about the privacy of applicant and student records, departments may wish to consult with the Office of the University Registrar. For guidance regarding unusual requests for records, departments are also advised to consult with the Office of the University Registrar. The Office of the University Registrar, in turn, may also consult with the Office of the General Counsel.

1.6 Disposal of Applicant/Student Documents

Any documents that contain non-public information about applicants and students - especially sensitive items such as applications for admission, letters of recommendation, grades, or private addresses - should receive special handling when retention is no longer necessary. They should either be shredded or destroyed in some way that maintains complete confidentiality and security.

1.7 Electronic Data Retention in the Student Information System

In partnership with CUIT, the Office of the University Registrar has analyzed the primary sources of new data that are recorded in the Student Information System (SIS) and has established protocol to ensure that this new information is not compromised, flawed, or incorrectly formatted when being carried over to SIS. The primary origination point of new data are the various admissions systems that port data into SIS. The Data Validation Tool that has recently been developed provides a robust way of ensuring that bad data are identified and corrected before they are ported to the current SIS. In addition, the Office of the University Registrar, in collaboration with CUIT, runs required queries and reports on a regular basis to identify duplicate, compromised, or unneeded records that are to be “quarantined” on at least an annual basis. The process of quarantining a record involves identifying it as a “bad” record that has no further use or purpose within the SIS database. Records that are routinely quarantined include:

- Prospect-only records that will no longer be ported into SIS, effective immediately.
- Admitted but not enrolled applicant records and denied applicant records will be maintained in SIS for ten years or twenty semesters. Each year, those records older than ten years or twenty semesters will be quarantined.
- All quarantined records in SIS will not migrate to a SIS replacement.
• All records involving only standardized test scores not associated with an application for admission and older than eight years.

In addition, during the SIS replacement project, course enrollment rosters that are older than ten years will not be converted to the SIS replacement. However, transcript data (academic history) will be converted independently of course enrollment rosters and will be maintained permanently in the SIS replacement.

Additional recommendations for retention of electronic student records in a SIS replacement include:

• Transcripts from 1982 forward will be permanently maintained.
• Data change logs constituting electronic logs of changes to enrollment and other data, including date and time stamp information as well as users responsible for transacting changed data if those data are maintained separately in the system, should be maintained for ten years.
• Enrollment data, including electronic records of enrollment in classes, including records of drop, add, and enrollment change activity, should be maintained for ten years.
• Grade data, including electronic records of submitted grades and grade changes as well as date/time stamp and user data, should be maintained permanently.
• Student demographic information, including electronic student data such as student characteristics and attributes, date of birth, former names, address information, and ethnic information, etc., should be maintained for ten years.

The following are recommendations for the maintenance of publications, statistical data, and institutional reports that are produced each semester and archived to enable purging from the SIS replacement as notated above:

• Degree statistics, including records of degrees granted by Columbia University by graduation term and/or annually, should be maintained permanently in an archive.
• Enrollment statistics, including term reports of enrolled students by class, by course, totals, headcount, etc., should be maintained permanently in an archive.
• Grade distribution and other grade statistics, including reports of grades recorded and summary grade point statistics by class, should be maintained permanently in an archive.

Race/ethnicity data, including reports of student enrollment, graduation, and other metrics by race and ethnic origin, should be maintained permanently in an archive.

Contacts
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Web Address

http://policylibrary.columbia.edu/retention-student-education-records