



<b>Policy Name</b>	Policy on Student Records Retention and Disposal
<b>Document Number</b>	RM 010
<b>Date Updated</b>	5/31/24
<b>Applicable Laws and Regulations</b>	HIPAA, FERPA, NHED Rule Ed 407.01, IRS record keeping requirements

### **Purpose**

To ensure that student records are retained for the correct length of time and that they are disposed of properly when they no longer are needed.

### **Applicability**

This policy applies to all employees of the Mount Prospect Academy, Inc., and the. The Executive Director is ultimately responsible for ensuring that compliance with this policy occurs. This policy may be modified or discontinued with or without notice, at the discretion of the Company. Employees are responsible for staying up to date with current procedures, practices, policies, and benefits.

### **Policy**

**Academic Records.** Academic records are the responsibility of the Director of Academics. An electronic file containing the following information and documents must be maintained indefinitely:

- Student's name
- Sex
- Date of Birth
- Place of Birth
- Town of Legal Residence
- Contact information (address, phone, e-mail)
- Parent/guardian name and contact information (address, phone, e-mail)
- Grades earned, attendance record, classes attended, grade level completed, and year completed.
- Transcripts of academic performance
- Record of award of high school diploma including the date of award
- Sending School name and contact information.
- In the event of a school closing or termination of operations, the school shall notify the department where student records shall be maintained permanently, or the school shall deposit these records with the department.
- Records shall be maintained in a format determined by the school.

1. Records indicating the racial composition of the student body, faculty, and administrative staff for each academic year.

**Other Student Records.** Upon discharge from the program, a student's records must be consolidated, and duplicate information destroyed. The student record includes all items in Extended Reach and, depending on the program, the student record may also include a paper file.

**Record Archive.** Upon discharge, student records should be archived in a secure location.

**Electronic Records.** Electronic records in Extended Reach should be re-classified so that they are secured in the "Closed" file. The Extended Reach system stores all data in a secure AWS Cloud system which provides assurance files are never lost.

**Paper Records.** Since most records request occur in the months after discharge, paper files should be maintained in a secure but accessible location for a period of two years, after which they should be moved to secure long-term storage. The location varies by program:

**Materials.** Copies of all materials used by or on behalf of the school to solicit contributions. (\*IRS Record keeping)

**Brochures, Catalogs and Advertising.** Copies of all brochures, catalogs, and advertising dealing with student admissions, programs, and scholarships. (Schools advertising nationally or in a large geographic segment or segments of the United States need only maintain a record sufficient to indicate when and in what publications their advertisements were placed.) (\*IRS Record keeping)

**Racial Composition.** Records indicating the racial composition of the student body, faculty, and administrative staff for each academic year. (\*IRS Record keeping)

Facility	Location of Secure Long-Term Archival Storage
MPA at Campton	Long Term Storage, MPA at Campton
MPA at Pike	Long Term Storage, MPA at Campton
MPA at Plymouth	Long Term Storage, MPA at Campton
MPA at Rumney	Long Term Storage, MPA at Campton
MPA at Warren	Long Term Storage, MPA at Campton
MPA at Hampton	Long Term Storage, MPA at Campton

**Retention Times.** Academic records must be maintained indefinitely. Other records will only be destroyed upon approval of Chief Compliance Officer or Director of Quality Assurance may be destroyed seven (7) years after the student reaches the age of majority, except Maine students. Maine student records are maintained twenty years.

**Record Destruction:** The destruction of records should be done in a way that is compliant with HIPAA rules. For example, paper records may be shredded by a certified secure paper shredding company provided a HIPAA Business Associate Agreement (BAA) is in place. To dispose of

PHI that has been saved to a thumb drive, CD, or hard drive, it is necessary to securely erase the files prior to the device being reused. Third party contractors can be used to dispose of electronic devices provided they are HIPAA compliant and a Business Associate Agreement (BAA) is in place.

**\*IRS Recordkeeping requirements:** With certain exceptions, given later, each exempt private school must maintain the following records for a minimum of 3 years, beginning with the year after the year of compilation of acquisition.

Action	Changes Made	Doc version	Date Approved
Created	1/10.2024		January 16, 2021
Updated 4/23/24	Updated language		
Updated 5/31/24	Added IRS requirements		