

# STUDENT RECORDS RETENTION POLICY

## OVERVIEW

Illinois law requires Moving Everest Charter School to maintain student educational records, which include both “permanent records” and “temporary records” for specified periods of time. Once the retention period for each type of student educational record has passed, Moving Everest Charter School is no longer required to maintain the records. In addition to legal compliance, the proper maintenance, retention and disposal of student records is necessary to support day-to-day school operations, promote efficiencies, protect against unauthorized access or release, breaches of confidentiality and to reduce the risk of identity theft.

### A. Categories of Student Records.

1. *Permanent Student Records.* Permanent Student Records consist of the following, whether in paper or electronic form:
  - a. Student Elementary School Transcript (including grades and attendance)
  - b. Student Health Record (consisting of health records required for enrollment and continuing enrollment, e.g. immunization, health exams, vision and dental exam); and
  - c. Student Registration Card
2. *Temporary Student Records.* Temporary Student Records consist of any document or data record, whether in paper or electronic form, directly related to a particular student and of clear relevance to the education of the student, that do not otherwise qualify as a Permanent Student Record. Temporary Student Records include, but are not limited to, a student’s cumulative folder, cumulative record card, enrollment records, elementary school state assessment scores, special education records, bilingual education records, program participation records, records of serious disciplinary infractions, DCFS reports, reports of a serious student injury and other information and correspondence of clear relevance to the education of the student, including electronic correspondence (e.g. e-



mail).

3. *Temporary Special Education*

*Records.* Temporary Special Education Records consist of any document or data record, whether in paper or electronic form related to the identification, evaluation or placement of a student for special education services or 504 Plan or to the implementation of a student’s Individualized Education Program (IEP) or 504 Plan and include, but are not limited to, the IEP and the 504 Plan in all their parts, eligibility determination and screening forms, consent forms, waiver forms, evaluations and assessments, parent notices, referrals, planning and meeting records including assessment assignments, progress notes, manifestation determination review, behavior plans, health- related information (e.g. medication logs), transition plans and service plans for private school students.

**B. Retention Period.** To administer state requirements to retain Permanent and Temporary Student Records (as defined in sections A.1., A.2. and A.3. above) for specified minimum time periods, the following retention requirements, based on student’s date of birth, are in effect:

Student Grade Level	Record Category	Minimum Record Retention Period	Destruction
Elementary	Permanent Student Records	82 years after the student’s date of birth	Student Age – 83
Elementary	Temporary Special Education Records	27 years after the student’s date of birth	Student Age – 28
Elementary	Temporary Student Records	20 years after the student’s date of birth	Student Age – 21

**C. Record Maintenance During Retention Period.**

1. *Responsibility.* Each school principal shall designate a school records custodian or coordinator who is responsible for the maintenance, care, security and proper disposal of student records whether or not the records are in his/her personal custody or control. To facilitate retention for the required duration, the school records custodian shall separate Permanent Student Records from Temporary Student Records for storage and maintenance purposes. The principal of each school or his/her designee shall ensure that school staff are informed about this Policy and comply with its requirements.

2. *Confidentiality.* Schools shall ensure appropriate measures are taken to protect the confidentiality of all student records and to further maintain heightened security for any student records containing highly confidential information such as social security numbers, medical or clinical information. The school records custodian shall take all reasonable measures to prevent unauthorized access to, or release of, student records.



Student records that contain social security numbers shall be maintained in a secure locked area. Student records created by a school nurse, social worker, counselor or psychologist that are governed by the Mental Health and Developmental Disabilities Confidentiality Act (“MHDDCA”) shall be maintained separately with heightened security measures in accordance with established protocols and the release of such records is subject to the terms of the MHDDCA.

3. *Student Transfers.* Schools shall satisfy the following records retention requirements when a student transfers to another school.

a) *Transfer Verification:* Records for those students projected or planning to transfer may not be sent to the projected new school until the student’s transfer has been verified or confirmed by the student’s new school. Once a transfer verification/confirmation is received from the student’s new school and records are sent, the school sending records shall log the transmittal of records and follow the procedural notices for recording a student records transfers in IMPACT.

b) *In-District Transfers:* Schools shall send the *original* Temporary Student Record files and the student health record folder to the student’s new in-district school. A student’s transcript is available to the student’s new in-district school upon enrollment via IMPACT.

c) *Out-of-District/Private School Transfers:* Schools shall send an official *copy* of the student transcript as well as *photocopies* of the Temporary Student Record files and student health records requested by the student’s new out-of-district or private school and shall maintain all original records for the duration of the required retention period. Original records must be retained by the sending school and may not be sent to the out-of-district or private school. Non-CPS charter schools are considered out-of-district schools for purposes of this policy.

d) *CPS Charter Transfers:* Schools shall send an official copy of the student transcript as well as the *original* Temporary Student Record files and the student health records requested by the student’s new CPS charter school. Schools shall make copies of all existing paper student records prior to transmission to the CPS charter school, however, printing of electronic student records from IMPACT is not required. Schools shall maintain these copies as original records for the duration of the retention period. See Section C.6. herein regarding long-term storage of these records.

4. *Record of Release.* Schools shall maintain a permanent record log which records each student records transfer made under Section C. and also records the release of student record information to a third-party. Such logs shall be maintained by the school in accordance with the protocols established by the Director of Operations & Compliance.

5. *Year-End Requirements.* To ensure compliance with permanent record obligations, schools shall follow the year-end requirements issued each spring for generating record

copies of student transcripts for students who graduate, withdraw or transfer to another school or otherwise

cease to be enrolled.



**D. Long-Term Storage.** To improve efficiencies and facilitate access to records for students with current enrollment in a school, a school shall send the records for students who have transferred, graduated or otherwise withdrawn from their school to Chicago Education Partnership's offsite storage facility for the remainder of the required retention period.

**E. Records Disposal.**

1. *Disposal Protocols.* Records maintained for the duration of the applicable retention requirement noted in Section B. herein are eligible for disposal and may be destroyed upon approval by the Executive Director. Schools shall not discard or destroy any Permanent or Temporary Student Records without proper approval and shall follow established protocols for the appropriate method of destruction to ensure confidentiality is not breached.

2. *Administrative Copies.* Additional copies of Permanent or Temporary Student Records that are kept for administrative convenience may be destroyed at any time without prior approval as long as the copy is shredded to ensure the confidentiality of the record information is protected.

3. *Accidental Loss or Destruction of Records.* Student records destroyed by fire, flood, natural disaster, environmental conditions, or lost due to theft or disposal-in-error must be immediately reported to the Director of Operations & Compliance.

**F. Required Student Notifications.** Schools shall provide a *Notice of Student Record Retention and Disposal* to all graduating students and students who withdraw or transfer from the school during the school year. The *Notice of Student Record Retention and Disposal* is available from the Operation Assistants.

**G. Violations.** Failure to abide by this Policy or related guidelines will subject employees to discipline up to and including dismissal in accordance with Moving Everest Charter School Policies.

Last revised: April 10, 2017

Board Approved: June 07, 2017