

# **SCHOLASTIC RECORDS MANAGEMENT, ACQUISITION, AND CONFIDENTIALITY POLICY**

Church Hill Preparatory Academy

## **Definitions**

For purposes of these procedures, the Richmond Public Schools Division (RPS) uses the following definitions and terms:

1. Student: any person who attends or has attended the Richmond Public School System.
2. Eligible Student: a student or former student who has reached age 18 or who is attending a post-secondary institution.
3. Parent: either natural parent of a student, a guardian or an individual acting as a parent or guardian in absence of the student's parent or guardian.
4. Education Records: any record (in handwriting, print, video or audio tapes, film, computer, or other medium) maintained by the Richmond Public Schools Division or an agent of the Richmond Public Schools Division, which contains information directly related to a student, except:
  - ✓ A personal record kept by a staff member, if it is kept in the sole possession of the maker of the record, and is not accessible or revealed to any other person except a temporary substitute for the maker of the record.
  - ✓ 2. An employment record which relates exclusively to an individual in his or her capacity as an employee of the Richmond Public Schools Division, or an agent of the Division, and which is not available for any other use.

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- ✓ Alumni records which contain information about a student after the person is no longer in attendance in the Richmond Public School Division and which do not relate to the person as a student.
  
- ✓ Records of the Security Office maintained separately from education records, maintained solely for law enforcement purposes, and disclosed only to law enforcement officials of the Richmond Public Schools.
  
- ✓ Records maintained by a physician, psychologist, or psychiatrist acting in his or her professional capacity used only in connection with the student's treatment, and disclosed only to individuals providing the treatment.

### **Records Management**

The Principal and designated staff person(s) shall be the primary persons responsible for ensuring the confidentiality and management of educational and personnel records for all students, parents or guardians or caregivers, and employees of the charter school. The School will manage scholastic records in compliance with all Richmond Public Schools manuals and procedures and state manuals and procedures as expressed in *Management of the Student Scholastic Record* and *Virginia Public Records Management Manual*.

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### **STUDENT PERMANENT RECORDS (CUMULATIVE RECORDS)**

#### *Storage and Location - Active Scholastic Records*

**General Education.** General Education Records will be stored electronically, and in the school's main office in a locked file cabinet. The Principal and designated personnel will have access and will make sure that files are managed and secured at all times.

**Records of past students (Withdrawn/Transferred).** These records are maintained by the personnel designated by the Principal and are filed electronically and in the school office.

**Special Education.** Special education records will be stored and maintained electronically and in a locked filing cabinet in the office of the Special Education Coordinator or other official designee of the School Director.

#### *Contents of Educational Records File*

A cumulative folder (brown jacket folder) and Category II (expanding pocket folder) should be made for all students new to the school system. Items in the student cumulative folder should be arranged in the following order:

#### **General Education.**

1. Record of Access and Disclosure Form (must be signed each time a folder is entered)
2. RPS 220 Personal Data and Activity Card (yellow)
3. Registration Forms and Transfer Information
4. RPS 230 Standardized Test Results Card for test labels (green)

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5. Standardized Test Profile Sheets (Stanford 9, SOL, PALS, LPT, SAT, PSAT, Explore, Plan, ACT, etc.)
6. Extra Test Label Envelopes
7. RPS 210 Elementary Academic Card (salmon) – Begin phasing out if still using as a divider. Additional supply will not be printed.
8. Transcript
9. Report Cards
10. Professional Notes Envelope – Teacher Comment Sheets and Access and Disclosure forms inside.
11. SPACE Program Materials
12. ESL Folder (green) for ESL students only – this is a new item
13. Cumulative Health Record
14. Disciplinary Information Folder
15. Writing Portfolio (blue) – file behind the brown jacket folder and in front of the Category II information
16. Category II information with appropriate dividers – should begin behind and outside of the brown jacket folder.
17. Photo attached to Cumulative Folder

A child who is designated as a student in need of special education will have a general education file and a special education file.

**Special Education.** All documents pertaining to the legal process of special education but not limited to Permissions to Evaluate/Re-evaluate, Evaluation Reports, IEPs, NOREPs, and IEP Progress reports, as well as Psychological Evaluations. Communications between parents and school, copies of disciplinary actions and other items that may be part of the general education file.

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The SOL Classroom Assessment Record should be purged or removed from the cumulative folder.

**Faculty and Staff Personnel.** Personnel files will include, but are not limited to, communications between administration and staff, formal and informal observations and samples of students work. They will also include background clearances, copies of any certifications, certificates, transcripts, etc.

### *Organization of Records*

**Elementary and Middle Schools.** Records should be filed in alphabetical order by homeroom.

**High Schools.** Records should be filed in alphabetical order by grade level.

**Faculty and Staff Personnel.** Personnel records will be stored in the office of the Administrative Assistant or School Director.

### **Filing Disciplinary Records.**

1. In conjunction with RPS policy, school Disciplinary Records must be kept in the students' cumulative folder.
2. Court Disciplinary Records are kept in the student's cumulative folder if the:
  - ✓ School takes disciplinary action
  - ✓ B) Incident occurred on school property or during school sponsored activity.

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3. Court Disciplinary Records are kept separate from the cumulative folder if the:
  - ✓ School does not take disciplinary action
  - ✓ Incident does not take place on school property or during school sponsored activity

### **Retention of Disciplinary Records.**

1. IF STUDENT WITHDRAWS TO ANOTHER RPS SCHOOL:
  - ✓ Send cumulative folder and any separate disciplinary folder to the new school.
2. IF STUDENT GRADUATES:
  - ✓ Place cumulative folder in inactive drawer. (Will be purged in 5 years as is normal).
  - ✓ Contact RPS Records Manager for destruction of any separate folders.
3. IF STUDENT WITHDRAWS FROM RPS:
  - ✓ Place cumulative folder in inactive drawer. (Will be purged in 5 years as normal.)
  - ✓ 2. Keep any separate folder for 5 years, then contact RPS Records Manager for destruction.

### *Access to Records*

**General Education.** General Education records will be secured electronically and in file cabinets in the school office. Designees of the School Principal will maintain and update educational records without permission. Teachers will have electronic and physical access to academic records and other information that have an educational impact. They must request permission to review other records in hard copy or electronically from the Executive Assistant or other

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designated personnel. The student's original records may not leave the office at any time. Parents may request the opportunity to see their child's file. Parents will be asked to put the request in writing and then they will be granted permission to view the file. The original file is not to be taken from the office and an official designee will supervise the viewing. Parents will, at that time, also be informed of their rights concerning their child's files.

**Special Education.** Special education records are highly confidential. These files will have additional restrictions. Hard copies of special education records will be located in the office of the Director of Success Services. They will be in a locked and secured file cabinet. Contents of a student's special education records will be maintained by the Director of Success Services or designated special education teacher. Faculty and Providers of Related Services (Speech and Language, Occupational Therapy, Counselling, etc.) who wish to view the contents of the file for the purpose of professional application must see the School Principal or the Director of Success Services. The file cannot leave the office and must be viewed in the presence and under the supervision of either of them. Teachers and Providers of Related Services must sign off that they have viewed the file.

### *Security*

All hard copies of records should be housed in a designated central and secure location. They must be stored in locked cabinets in an organized "records room" that has key entry. Electronic records must be digitally secured.

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### *Acquisition of Special Education Records*

Acquisition of special education records shall be the responsibility of the Success Services Director following Richmond Public School Division procedure.

### *Transfer of Records*

Requests by parents, guardians, and caregivers to have educational records transferred to a new school will be done through the Executive Assistant or other designated personnel.

**Voluntary Withdrawal.** Parent or guardian or caregiver must complete and sign a withdrawal form. The School Principal is immediately notified of withdrawal requests. The Executive Assistant processes the request for the records transfer by making a copy of the entire file and sending it to the receiving school. A copy of the withdrawal form will be placed in the student's file. The Executive Assistant should update district computers with the change of placement.

**Special Circumstances.** All document transfer and official communication with the authorities will go through the School Principal. The Principal's designated personnel will manage the transfer of records to the proper authorities.

### *Uses of Gathered Information*

The information gathered by the School will be used to help make the community aware of the educational programs and the goals of the school may use the information in fulfilling its duties of data gathering to local, state and federal governmental agencies and in writing of grants for funds and services aimed at improving the educational programs that are provided for its students.



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Whenever possible all efforts will be made to protect the identity of children and their families in the application for grants and the reporting of information to local, state or federal agencies.

Information may be used to increase understanding of the school through articles, photographs, possible postings on the school website and newsletters. Release forms must be secured. Parents will have an opportunity as they complete the annual registration process to sign permission slips for the release of information.

### *Trainings on managing and maintaining educational records*

The School Principal shall provide or arrange training and informational sessions to new and veteran teachers and staff. Informational sessions for parents will be done by the  
a designated staff person about the rights of parents with regards to their child's educational records. When there is a need for additional training the School Principal will turn to outside sources.

### *Confidentiality Policy Regular and Special Education Student Records*

The School protects the confidentiality of personally identifiable information regarding its eligible, thought to be eligible, and qualified handicapped students (if not protected by IDEA '04) in accordance with the Family Educational Rights Privacy Act of 1974 (FERPA) and other applicable federal and state laws, policies and regulations.

For all students, the School maintains records, which include but are not limited to:

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**Personally identifiable information.** Confidential information that includes, but is not limited to, the student's name, name of parents and other family members, the address of the student or the student's family, and personal information or personal characteristics which would make the student's identity easily traceable.

**Directory information.** Information contained in an education record for a student which would not generally be considered harmful or an invasion of privacy, if disclosed. It includes, but is not limited to, the student's name, address and telephone number, date and place of birth, major field of study, participation in recognized activities, weight and height, dates of attendance, award received and records from the most recent previous educational agency or institution.

The Family Educational Rights and Privacy Act (FERPA) afford parents and students over 18 years of age ("eligible students") certain rights with respect to the student's education records. They are:

1. Parents have the right to inspect and review a child's education records. The School will comply with the request to inspect and to review education records without unnecessary delay and before any meetings regarding an IEP or any due process hearing, but in no case more than 30 days after the request has been made. Requests should be made in writing to the School Principal indicating the parents wish to inspect. Parents will receive a response from the school for reasonable requests for explanations and interpretations of the records. Parents may request and receive copies of the records. While the school will not charge a fee

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- to search for or retrieve information, it may charge a copying fee as long as it does not effectively prevent the parents from exercising their right to inspect and review their child's records. If any education records contain information on more than one child, parents have the right to inspect and to review only the information relating to their child.
2. If parents believe that information in an education record is inaccurate, misleading or violates the privacy rights of their child, they may request an amendment to the record. Requests should be in writing and must specify why it is inaccurate or misleading. The School will decide whether or not to amend the record and will notify the parents in writing of their decision. If the School refuses to amend a record, it will notify the parents of their right to a hearing to challenge the disputed information. Additional information regarding the hearing procedures will be provided to parents or eligible students when notified to the right of a hearing.
  3. The School will inform parents when personally identifiable information is no longer needed to provide educational services to a child. Such information is no longer needed to provide educational services to a child. Such information must be destroyed at the request of parents. Parents have a right to receive a copy of the material to be destroyed. However, a permanent record of a student's name, address and telephone number, his or her grades, attendance record, classes attended, grade level completed, and year completed, may be obtained without time limitation. "Destruction" of records means physical destruction or removal of personal identifiers from information so that the information is no longer personally identifiable.

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4. The School will provide upon request, a listing of the types and locations of education records maintained, the officials responsible for these records, and the person authorized to see personally identifiable information. Such personnel will receive training and instruction regarding confidentiality. The School keeps a record of parties obtaining access to educational records, including the name of the party, the date access was given, the organization the party represents, and the purpose for which the party is authorized to use the records.
  
5. Parents have the right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. "Consent" means the parent(s) have been fully informed regarding the activity requiring consent, in their native language or other mode of communication; they understand and agree in writing to the activity; and they understand that consent is voluntary and may be revoked at any time; information may be disclosed with consent to the Charter officials with legitimate educational interests. A Charter School Official is a person employed by the immediate unit as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel); state agency representative, person or company with whom the Charter has contracted to perform a special task (such as an attorney, auditor, medical consultant, or therapist); or a parent or student serving on an official committee, or assisting another Charter Official in performing his or her tasks. A Charter Official has a legitimate educational interest if the Official needs to review an educational record in order to fulfil his or her professional responsibility.

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Directory information may be released without parent consent. Parents have the right to refuse to let an agency designate any or all of the above information as directory information.

6. Upon written request, the Charter School will disclose educational records without consent to officials or another Charter School or school district in which a student seeks or intends to enroll.
  
7. Parents have the right to file a complaint to the U.S. Department of Education concerning alleged failures by the Vida Charter School to comply with the requirements of FERPA. Complaints may be filed with the:

Family Policy Office

U.S. Department of Education 401 Maryland Avenue, S.W.  
Washington, D.C. 20202-4605

### *Standard Year-End Procedures for Purging and Archiving Inactive Records*

1. During the week after students leave school, RPS Division Records Management staff will remove all 5-year-old student cumulative folders from all schools.
  
2. End of June – the first week of August, schools verify and separate all inactive student records and destroy separate disciplinary records of graduates. The school should already have an inactive student's file drawer (labelled "2012-2013" for example) for the "no-shows" and withdrawals for the past school year. High schools combine these with

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- the 12th Grade graduates and label all inactive drawers with the past school year.
3. Use the "Withdrawal Report" supplied at the end of each school year to verify that the inactive drawers contain 1) a cumulative folder for each student who graduated or withdrew during this past school year and 2) any separate disciplinary records for those who withdrew. (Store on-site for 5 years.)
  4. Separate disciplinary records for graduates are to be destroyed. Contact Tony Johnson (Division Records Manager, 780-5601, [tjohnson@richmond.k12.va.us](mailto:tjohnson@richmond.k12.va.us)) for destruction.
  5. Insert the records of students who graduated as a result of summer school into the same inactive files drawers for the past school year. Contact Tony Johnson (Division Records Manager, 780-5601, [tjohnson@richmond.k12.va.us](mailto:tjohnson@richmond.k12.va.us)) for the destruction of any separate disciplinary records the summer graduates may have.
  6. All Principals acknowledge separation of the inactive student folders for the last five school years by submitting the form, Annual Acknowledgement of Separated Inactive Student Records, supplied with the "Withdrawal Report."
  7. Obsolete Non-Student Records:  
Annual procedures are posted on my.RPS for pickup and destruction of obsolete financial, personnel, or other non-student records at <http://my.rps.edu/Information/PoliciesandProcedures/Documentation/GuidelinesforDestroyingObsoleteRecords.aspx>. Or contact Tony Johnson, the Division Records Manager, at 780-5601, [tjohnson@richmond.k12.va.us](mailto:tjohnson@richmond.k12.va.us) for verification and arrangements for pickup.