

Element 9.4: Secure Student Recordkeeping

Michigan State University maintains student education records and is responsible for their access and release in accordance with FERPA. It is the policy of the University to comply with FERPA. The MSU Access to Student Information Guidelines govern the procedures of MSUCOM for the maintenance and disclosure of information from student education records held by the University. All University employees and faculty with access to student education records have an obligation to comply with FERPA guidelines. Detailed information about MSU FERPA resources may be reviewed at:

<https://reg.msu.edu/ROInfo/Notices/PrivacyGuidelines.aspx>

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1. MSUCOM Policy and Procedures for Secure Student Record Keeping
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In accordance with and under the jurisdiction of Michigan State University, the College of Osteopathic Medicine maintains student education records and is responsible for their access to and release as governed by the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g ("FERPA"). "Education records" are those records, files, documents, and other materials which contain information directly related to a student and are maintained by the University or by a party acting on behalf of the University.

The student education record consists of electronic files. MSUCOM has a permanent and safe system for keeping student records. Records, including admissions (pre-matriculation) and academic (post-matriculation) files, are managed within Perceptive Content. Performance evaluation of each clinical rotation is added during the clinical training years.

MSUCOM utilizes a secure online paperless admissions management (AMP) software system for its applicants. The [AMP](#) (Paperless Admissions Management) software system provides best-in-class encryption and secure collection of all students' personal, financial and academic documentation. Data is automatically transferred and fully integrated with the MSU Student Information System Campus Solutions.

MSUCOM utilizes an additional secure records room in the basement of the East Lansing campus location. This secure room currently stores some student record paper files, in fire-protected filing cabinets for dismissed, suspended, and withdrawn students prior to 2023. MSUCOM utilizes MSU [Archives and Historical Collections system](#) for all records of graduates before 2024. All student paper records from 1973 through 2024 have been physically transferred to a secure and confidential archive location.

MSUCOM has a permanent and safe system for keeping student records. Electronic records are kept in secured in the student information systems administered by the Office of the COM Registrar in East Lansing, Campus Solutions and Medtrics (student rotation evaluations). These records are electronically backed up for security. Access to these systems is limited to authorized staff only. These systems provide many reports for tracking student progress.

The main sections of these systems include, but are not limited to:

1. Pre-matriculation data of GPA, MCAT and previous college history
2. Student demographic information, matriculation and graduation dates, photographs
3. Course history, including enrolled courses, credits, performance, grades
4. Academic, professional and clinical performance
5. COMLEX scores
7. Clinical rotation schedules, requirements, grades and student rotation evaluations

Not included within the MSUCOM student record are:

1. health and immunization records
2. law enforcement or campus security records
3. employment records
4. physician, psychiatrist, psychologist or other recognized professional or paraprofessional

Any release of student records requires written authorization from the student. This documentation is kept in the student's individual academic file. In all cases, student information is considered strictly confidential and kept in a secured system that is only accessible to authorized personnel.

Secure online access to electronicsystems is granted by the College Security Administrator and all users are required to be in compliance with the [Family Educational Rights and Privacy Act](#) (FERPA). All MSU affiliated individuals with access to student data are required to complete FERPA training administered through the MSU Ability system.

Students have access to their files, within established procedures along with authorized staff. All "need to know" requests for student information by those who have a "legitimate educational interest" are screened by the COM Registrar and a determination made according to established guidelines. "Legitimate Educational Interest" is defined as an individual who has a legitimate educational interest in education records if the information or record is relevant and necessary to the accomplishment of some employment or other institutional task, service, or function.

Information released to a third party requires completion of the release of information authorization form. All data requests are subject to approval and compliance with FERPA (Family Educational Rights and Privacy Act) and University Policy. MSUCOM does not release student names and addresses for commercial purposes. For the full MSU policy, see the [Michigan State University Access to Student Information](#) in the [General Information, Policies, Procedures and Regulations](#) section of [Academic Programs](#).

The MSUCOM Registrar is responsible for screening individuals and granting access to systems that contain student information. Based on the security level, online training is provided through Michigan State University Registrar's office:

1. <http://archives.msu.edu/records/documents/AcademicRecords.pdf>
2. <https://reg.msu.edu/Forms/UserAssist/SISTraining.aspx> SIS Training
3. <https://reg.msu.edu/ROInfo/Notices/PrivacyGuidelines.aspx> FERPA Training
4. <https://reg.msu.edu/Forms/UserAssist/SecurityList.aspx> MSUCOM Security Officer
5. <https://tech.msu.edu/about/guidelines-policies/idp-acknowledgement-form/> Institutional Data Policy (IDP)
6. <http://tech.msu.edu/wp-content/uploads/2015/08/idp-acknowledgement-form.pdf> IDP Form

This policy complies with standards established in FERPA. The policy has established procedures for maintenance and access to student education records held by the University.

ACADEMIC AND CAREER GUIDANCE POLICIES AND PROCEDURES ON SECURE STUDENT RECORD KEEPING

Written documentation of all official encounters of Academic and Career Advising personnel student encounters are placed in the notes section of the Electronic Student Academic Folder (ESAF). Records are maintained electronically under the purview of the MSU COM Registrar utilizing a password-protected system. Records are not strictly confidential as they can be viewed by MSU personnel who are authorized to use the system. In MSUCOM this includes the Associate Dean/Student Affairs, COM Registrar, and Director of Personal Counseling/Health Promotion. Under FERPA, students maintain the right to review all notes stored in ESAF.

Documentation of Academic and Career Advising personnel-student encounters serves two primary functions: record-keeping and office performance metrics. ESAF documentation of encounters enables tracking of student performance, identification of trends and patterns, and continuity of guidance over time. Metrics can be used to evaluate utilization of services and staffing requirements.

Documentation in ESAF is not required for casual/personal encounters between an advisor and student that are unrelated to the role and responsibilities of the advisor.

1. Types of advisor-student encounters that require documentation:

- a. Face-to-face meetings (required, voluntary, scheduled, drop-in)
- b. Email communications
- c. Phone calls
- d. Skype or FaceTime calls
- e. Revisions of Curriculum Vitae and/or Personal Statements

2. Types of information to include in ESAF

Report of encounter should be fact-based and follow the general outline of: reason for meeting, relevant information regarding student's progress towards goals, information provided to the student, list of suggestions, cite actions requested of the student and require follow-up, referrals provided, and possible follow up communication taking place outside of an advising meeting. Objective language should be utilized.

- a. Reason for meeting
- b. Pertinent details for future reference
- c. Outcome
- d. Actions to be taken (including referrals to the Associate Dean/Student Affairs, COM Registrar, and Wellness and Counseling)

3. Types of information to exclude from ESAF note:

Though a note can be tagged as "Confidential" all authorized MSU ESAF users are able to view the note; therefore, discretion should be used with regard to its contents. When in doubt, the advisor should limit the type and amount of detail included in the note.

- a. Details revealed by the student that are of a deeply personal nature and/or potentially compromising or harmful to the student's career or personal well-being (e.g., history of abuse, drug use, diagnosed learning disability, mental illness,

- medical conditions).
- b. In the case of incidents disclosed covered by Title IX, no details of disclosure should be noted.
 - c. Information revealed by the student that the advisor agreed to keep confidential if it aligns with the policy of the university/law as confidentiality cannot be guaranteed.
 - d. Detailed academic and board performance information beyond that which is already included in ESAF.
4. Recommended alternatives to detailed documentation:
Use generic phraseology, such as, “student revealed information of a personal nature that has been impacting on academic performance,” “student reported having experienced a personal crisis,” or “student referred to the Office of Personal Counseling/Health Promotion.” Rather than including the entire content of email, redact relevant portions of the email or simply note the date of receipt of the student’s email but keep the email itself in an archived mail folder for future reference.
5. Timeframe:
For encounters that occur during normal business hours Monday-Friday documentation should be completed within 48 hours of the encounter. For encounters that occur over the weekend or holiday, documentation should be completed within 48 hours of returning to work.

CONFIDENTIALITY OF STUDENT HEALTH RECORDS

Michigan State University (MSU) requires certain health records of all enrolled students. These records are maintained in accordance with the Health Insurance and Portability and Accountability Act (HIPAA) and MSU policies. These may be found online at: <https://www.healthteam.msu.edu/patients/patient-rights.aspx>

Because osteopathic medical education includes education in clinical settings, MSUCOM students must comply with measures to promote their personal health and safety, as well as the health and safety of patients and others. This information may be required at clinical rotation sites.

Documentation of compliance are maintained in CastleBranch for Osteopathic Medicine students and Exaat for Physician Assistant students. This documentation includes results of tests for tuberculosis and evidence of immunizations and expiration dates. This information will be maintained securely by the COM Compliance Outreach Coordinator and personnel in the Office of the COM Registrar, as well as Student Affairs personnel at the Macomb and Detroit sites, may have access to this information to ensure compliance.

Students may be required to submit a physician’s note or other documentation in association with an Excused Absence Request. Such documentation will be viewable only by those individuals responsible for the Excused Absence Request review process.

The medical records of students who seek medical care with MSU affiliated healthcare providers and/or Olin Health Services on the MSU East Lansing campus will be maintained confidentially by those providers and will not be part of a student’s academic record, unless the documentation is provided to meet compliance requirements.

Medical documentation submitted by or on the behalf regarding special circumstances, such as a leave of absence or review of performance issues, will be maintained in a confidential, secured file by the Assistant Dean of Student Affairs.