



MSUCOM POLICY AND PROCEDURES FOR SECURE STUDENT RECORD KEEPING

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

The student education record consists of both paper and electronic files. MSUCOM has a permanent and safe system for keeping student records. Paper records, which include admissions (pre-matriculation) and academic (post-matriculation) files, are managed within the [Lektriever Vertical Carousel](#), a secure automated filing storage system. This apparatus is maintained at the East Lansing campus, considered home base during the preclinical training years. An additional paper file, which holds the 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 student personal, financial and academic documentation. Data is automatically transferred and fully integrated with the MSUCOM Student Information System (COMSIS).

MSUCOM utilizes an additional secure records room in the basement of the East Lansing campus location. This secure room currently stores all student record paper files, in fire-protected filing cabinets, for dismissed, suspended, withdrawn, and transferred students as well as graduates of MSUCOM from the years 2011 through 2017. MSUCOM utilizes MSU [Archives and Historical Collections system](#) for all records of graduates before 2011. All student paper records from 1973 through 2010 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 computerized student information systems administered by the Office of the College Registrar in East Lansing, COMSIS and Filemaker. 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, trends and projections. 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. COMSAE, COMLEX performance
6. [Compliance tracking](#)
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 filing system that is only accessible to authorized personnel.

Secure online access to electronic systems is granted by 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 pass a FERPA quiz annually; the quiz is administered through the MSU RO web site. A training module regarding Family Educational Rights and Privacy Act (FERPA) is available in Desire2Learn (D2L). To complete the module, log into d2l.msu.edu and self-register for the course titled "FERPA for MSU staff and faculty."

All student records are confidential and strict adherence to the Federal Family Education Rights and Privacy Act (FERPA) and University Guidelines for Access to Student Information is followed. 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 College Registrar, and a determination made according to established guidelines. Legitimate Educational Interest is defined as an individual 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. Michigan State University College of Osteopathic Medicine 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](#). Requests for student information should be submitted to the MSUCOM Office of the Registrar using the Data Request Form available at: http://www.com.msu.edu/Students/Registrar/Request_Student_Information_Student.pdf

The MSUCOM Security Officer 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.