Confidentiality, Maintenance, and Amendment of Student Educational Records Policy

Policy Statement and Purpose

The Liaison Committee on Medical Education (LCME) has established standards regarding the availability and confidentiality of student educational records. In order to comply with LCME standards, state and federal laws, and federal guidelines regarding the privacy of student educational records, the Virginia Commonwealth University School of Medicine has defined procedures for storing and maintaining these records. Additionally, the VCU SOM has defined who may access these educational records, and the process by which allowable parties must request access.

Stakeholders

The faculty, staff, and students of the VCU School of Medicine are responsible for knowing this standard operating procedure, its contents, and provisions.

Definitions

Academic Record: A document intended for internal use within the institution; this is an unabridged summary of a student's academic history at the institution that may contain academic information beyond that of a student's transcript.

Academic Transcript: A certified document intended for use by parties outside the institution; this is an unabridged summary of the student's academic history at the institution.

Directory Information: VCU recognizes the following information as part of the student directory, and will release this information upon request unless the student provides a written request that states otherwise:

- Student's legal name
- Student's preferred name
- Dates of admittance and attendance
- Major, minor, or other area of specialization
- Full or part time enrollment status
- Student classification (year in program)
- Date(s) and type(s) of degree(s) and honor(s) awarded
- Photograph

FERPA: Family Educational Rights and Privacy Act of 1974.

LCME: Liaison Committee on Medical Education. The group with authority to accredit medical education programs leading to the MD degree in the United States and Canada.

Registrar: Includes the Registrar and any Assistant Registrar(s). Individual(s) within the Office of Medical Education responsible for the maintenance, storage, and distribution of all educational records and transcripts.

VCU SOM: Virginia Commonwealth University School of Medicine.

Responsibilities

Registrar: The Registrar is responsible for maintaining accurate academic records for all individuals who have taken coursework at the VCU SOM, and honoring requests for the review or copy of student educational records and transcripts as outlined in these procedures.

Procedures

Requests for Review of Educational Records

Requests by Students

Students may request a review or copy of their personal educational records. All requests for review or copies should be made to the Registrar and must adhere to the following process:

- Student will submit a written request to the Registrar indicating their specific request for either review or copies of their educational records.
    - This request should detail the specific components of the educational record the student wishes to review or have copied.
- The Registrar will grant access to the student to review the requested items or provide copies to the student within forty-five (45) days of receipt of the written request.
- Students may not access any components of their educational record to which they have previously waived their right to review (i.e. letters of recommendation).

Requests by Individuals with a Legitimate Educational Interest

FERPA regulations and VCU guidelines allow individuals with a legitimate educational interest to review a student's permanent educational record. While FERPA guidelines do not explicitly define the criteria for 'legitimate educational interest', VCU has outlined the following list of individuals as those who may have a 'legitimate educational interest' that warrants review of a student's permanent educational record:

- A school official, employed by the university in an administrative, supervisory, academic, research, or support staff position.
    - This includes law enforcement personnel and health staff.
- An individual serving on the board of trustees.

- A student serving on an official, university sanctioned committee such as a disciplinary or grievance committee.
- A volunteer or contractor from outside the university who performs an institutional service or function for which the university would otherwise use its own employees.
    - These individuals must be operating under the direct control of the university concerning the use and maintenance of personally identifiable information gathered from a student's permanent educational record.
    - This includes individuals such as an attorney, auditor, collection agent, or a student volunteering to assist another school official in performing these their assigned tasks.
- These individuals are considered to have a 'legitimate educational interest' only if their assigned work requires them to review a student's educational record to fulfill their professional responsibilities to the university.

Requests by Outside Entities/Third Parties

FERPA guidelines allow for the release of educational records to outside entities/third parties in limited instances. These instances do not require student consent prior to the release of the record(s), and may include:

- Educational institutions where the student may be enrolled or may be seeking enrollment.
- Specific local, state, or federal government officials for audit purposes.
- Accreditation agencies and/or regulatory bodies.
- Appropriate parties/entities in connection with financial aid for the student.
- Individuals or entities as required to comply with a judicial order or lawfully issued subpoena.
- Appropriate parties as necessary in connection with a health or safety emergency.

The Registrar will ensure all requests by outside entities and third parties are allowable prior to releasing any record(s).

Amendment of Educational Records

Students may request an amendment for any inaccurately recorded information in their permanent educational record. All requests for amendments should be made to the Registrar and will adhere to the following process:

- Student will meet with the VCU SOM Registrar to review any requests for amendments.
- If a resolution to the request cannot be achieved, the student may request a meeting with the Senior Associate Dean for Medical Education and Student Affairs (SADMESA).
    - The SADMESA has final authority over educational records and is responsible for determining if a request for amendment will be approved.
        - If the student request is approved the Registrar will update the educational record accordingly.
        - If the student request is denied, the record will remain unchanged.
            - In instances where requested changes are denied, the student may submit a written notation of disagreement with their record.

- This written notation will become a permanent part of the students file.

- Amendments to information in a student's permanent educational record may only be requested for items that have been reported incorrectly within the record. Requests to change any grade for reasons other than inaccurately recorded information within the student record must follow the grade appeals process and will not be considered under these amendment procedures.

Related Policies

Grade Appeals in the Pre-Clinical Phase and Longitudinal Curriculum Policy
Grade Appeals in the Clerkship Phase Policy

Review Cycle and Revision History

The policy is reviewed and may be revised by the Curriculum Council as necessary, but at least every three years.

Currently Approved Version: 02.12.2026

Previously Approved Versions: 04.28.2022
10.31.2023

Applicable Laws, Regulations & Standards

LCME Standards for Accreditation of Medical Education Programs Leading to the MD Degree:

- LCME Standard 11, Element 5