



Department of Nursing  
**Policy #012**  
**Student Record Management**

<b>Status:</b>	Approved 2023-06-09
<b>Effective:</b>	2023-06-09
<b>Initiated by:</b>	Faculty Assembly
<b>Relevant WAC/ Standards/References:</b>	WAC 246-840-519

**Purpose**

The purpose of this policy is to:

- 1) provide guidelines for assembly, storage, transmission, access, and protection of student records
- 2) to describe the confidentiality of student education records; to inform students of their rights under FERPA; and to identify the responsibilities of those who may maintain, access, or use educational records on behalf of the university

**Audience**

This policy applies to all persons in the Department of Nursing and any Heritage University consultant or employee requiring access to student records.

**Plan**

The Chair of the Department of Nursing has the authority and ultimate responsibility for preserving the security and integrity of student records for Nursing Department functioning and program evaluation. The Chair delegates authority and responsibility for data security and integrity to department administrative staff. Proper stewardship of student records facilitates access to data that supports the work of those with responsibilities within the Department of Nursing [policy #011 Data Management].

Data are available on an as-needed basis to individuals within the Nursing Department to carry out the roles and responsibilities of their positions as described in more detail below. An individual interested in utilizing student records for any other purpose must request the Data through the Department Chair. The Nursing Faculty Assembly is responsible for interpreting this policy governing data access.

## Policies and Procedures

### Student University Records

The Heritage University Registrar maintains an academic file for each student. This file includes:

- 1) original transcripts
- 2) declaration of major
- 3) change of major
- 4) applications for graduation
- 5) advising worksheets
- 6) course "Incomplete" contracts

### Student Nursing Department Records

The Administrative Coordinator for the Department of Nursing creates a nursing student file for each student who applies to the nursing program. Student files are updated upon creation of any of the documents listed below.

Nursing course assignments, excluding clinical evaluations, are not required to be retained in the student file. These shall be available on the MyHeritage Learning Management System and in the Anthology ePortfolio including written and voice recorded, and video recorded assignments.

Student files include the following:

- 1) Application, selection, and admission documents
  - a. Copy of application for admissions to HU
  - b. Application to the Nursing Program
  - c. Application essay
  - d. Letters of reference
  - e. Copies of official transcripts (originals are retained by the Registrar)
  - f. Admissions and/or transfer equivalency testing
  - g. Signed Documents from BSN Program Orientation
    - i. Acknowledgment of the Nursing Student Handbook
    - ii. Student Disclosure Pursuant to RCW 18.130.180 Confidentiality Agreement

- 2) Immunizations and Other Documents Required for Clinical Practice

Castlebranch, a third-party data management for clinical screening and requirements, is utilized for storage and tracking of data required for students' clinical participation. Only a completion/compliance document is kept in students' files – original documents are submitted to Castlebranch. Students can give Clinical Agencies permission to access their personal CastleBranch for verification of immunization and safety status.

- a. Immunizations, immunity titers, and screenings [policy #040 Immunization and Other Requirements]
- b. AHA Healthcare Provider BLS
- c. Student malpractice insurance
- d. Health insurance
- e. Bloodborne pathogen training
- f. HIV/AIDS training
- g. Suicide training

3) Background Checks

When the students are accepted into the nursing program a Washington State Patrol Washington Access to Criminal History web search is done and repeated at the beginning of every semester while in the nursing program. Students are required to complete a nationwide background check through Americhex which is sent directly to a designated email at Heritage University printed and placed in the file.

- a. Criminal History Background Check, signed by applicant, Disclosure Pursuant to RCW 43.43.834 Child and Adult Information Act
- b. Provider Credential Search for any license information

4) Clinical Practice

- a. Final evaluation of Student Clinical Competencies by the student and nursing faculty supervisor
- b. Performance improvement plan of clinical performance, if applicable from mid-rotation evaluation of clinical competencies
- c. Documentation of clinical errors and near-misses [#031 Reporting Errors and Near-misses]

5) Correspondence to and from Students

All correspondence to and from students with the department of nursing, including but not limited to:

- a. Status of advancement, progression, retention, and graduation
- b. Academic contracts such as performance improvement plans
- c. Grade appeals
- d. Complaints
- e. Disciplinary actions
- f. Third-party requests for student information, described below
- g. Other "official" departmental functions

**Compliance with FERPA**

The Family Educational Rights and Privacy Act (FERPA) is a federal law that governs the privacy of student education records and provides students with certain rights to protect, access, and request amendments to, their education records.

1) Disclosure to University Officials

- a. The Department of Nursing may disclose or permit access to personally identifiable information from a student's record without the student's consent if the disclosure is to the Program Director, nursing faculty, nursing staff, or Heritage University officials with a legitimate educational or administrative interest related to the student's academic status or progress.
- b. The Department of Nursing will not disclose information from a nursing student's record to a person or entity outside of the University without the student's written consent, or as specifically authorized by law.

2) Disclosure to Third Parties with Student's Written Consent

- a. A third-party requesting access or copies of nursing student records must provide prior written consent from the student. The third party is to be reminded that they should not

permit additional access to the information by an additional person without further written consent of the student prior to such an additional transfer of information.

- b. When information on a student must be disclosed, all persons, agencies, or organizations desiring access to the records of a student shall be required to sign a written form to be kept permanently with the file of the student indicating specifically the legitimate family, educational, legal, or other interest in seeking this information. This form will be available solely to the student and to the Heritage University Department of Nursing Administrative Coordinators and Department Chair as a means of auditing the operation of the record system.

3) Disclosure To Third Parties Without Student's Written Consent

In certain circumstances, FERPA permits the university to disclose information from a student's education record to a third party without the student's written consent. These exceptions include but are not limited to:

- a. Certain Federal, State, and Accrediting Authorities  
This policy shall not preclude access to student records by authorized accreditation bodies and Washington State officials in connection with the audit and evaluation of the quality of the Nursing education programs, or in connection with the enforcement of federal and state legal requirements that relate to the Nursing Program. Information may also be released to accrediting organizations to carry out their accrediting functions. Excluding collection of personally identifiable data is specifically authorized by federal and state law, any data collected and reported with respect to an individual student shall not include information (including Social Security number) that would permit the personal identification of such student.
- b. Relating to Financial Aid  
Disclosure of information may be made in connection with the student's application for, or receipt of, financial aid, so long as the information is necessary for determining eligibility of aid, amount of aid, conditions of aid, or to enforce the terms and conditions of the aid.

4) Disclosure to Research Studies

Disclosure of information to third parties conducting research studies for, or on behalf of the university, is permitted if the study is to develop, validate, or administer predictive tests; administer student aid programs; or improve educational instruction. The university must also agree with the purpose of the study and execute a written agreement with the research organization. The written agreement must set forth the purpose, scope, and duration of the study, among other provisions. Whenever possible, it is preferable to provide only de-identified data to the research organization.

5) Disclosure to Parent of a Dependent Student

Disclosure may be made to parents, legal guardians, or other persons acting as a parent in the absence of a parent or guardian, of a dependent student as defined by Section 152 of the Internal Revenue Code of 1986.

6) Pursuant to Judicial Order or Legal Action

- a. Disclosure may be made to comply with a judicial order or lawfully issued subpoena. Unless prohibited by the order, subpoena, or law, the Department of Nursing will make

a reasonable effort to notify the student of the order or subpoena in advance of compliance.

- b. If the student initiates legal action against Heritage University, the Chair of the Department of Nursing and BSN Program Director will defer disclosure to the Office of the Provost and the Vice President of Academic Affairs

7) Disclosure for Health or Safety Emergency

- a. Disclosure of information in connection with an emergency may be made to the appropriate parties if knowledge of the information is necessary to protect the health or safety of the nursing student or other individuals.
- b. The Chair of the Department of Nursing or BSN Program Director is responsible for making this determination, which is made on a case-by-case basis and temporally limited to the period of the emergency.
- c. If it is determined that disclosure is appropriate, the Department of Nursing must maintain a record demonstrating:
  - i. the articulable and significant threat to the health or safety of a student or other individuals that formed the basis for the disclosure
  - ii. the parties to whom the information was disclosed

**Evaluation of Student Files**

An audit of student files for completeness and accessibility shall be conducted by the Administrative Coordinator each term after the submission of grades. Students are contacted by email and phone if any missing or expired documentation is needed from them.

An annual systematic evaluation of department data for adequacy and security, as described in policy #011 Data Management will include student files.

**Policy Reviewers**

Proposed revisions of this policy should be reviewed by:

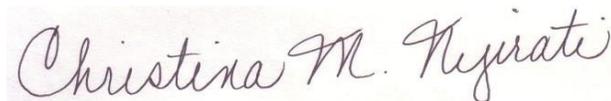
- 1) Nursing Faculty Assembly
- 2) Policy & Bylaws Committee

**Forms**

- Student agreement to have criminal background check
- Permission for third party access

**References**

- WAC 246-840-519  
<https://app.leg.wa.gov/wac/default.aspx?cite=246-840-519>



Signature: \_\_\_\_\_



Department of Nursing  
**Background Check Release Form**

If I have successfully completed all of my application requirements and have been conditionally admitted to the Bachelor of Science in Nursing (BSN) Program at Heritage University, I will allow the Department of Nursing at Heritage University to do a background check on me in order to determine if I am in compliance with the Washington Department of Health RCW 18.130.050 (13).

**Student Name:** First Middle Last

**Heritage University ID#:**

**Heritage University Email:**

**Home Address:** Number Street City State Zip

**Phone #:**

**Student Signature:**

**Date:**



## HERITAGE UNIVERSITY DEPARTMENT OF NURSING

### STUDENT CONSENT FOR RELEASE OF INFORMATION TO THIRD PARTIES

The Family Educational Rights and Privacy Act (FERPA) protects the privacy of student education records by prohibiting their disclosure without the student's written consent, except under limited circumstances. Students may choose to allow the release of their education records to specified third parties by completing this form. Please note that all fields listed below must be completed and that the student must **sign and date** this form. Please further note that while this form may *authorize* the Department of Nursing to release the student's records, it does not *obligate* the Heritage University Department of Nursing to do so. Heritage University Department of Nursing reserves the right to review and respond to requests for release of education records on a case-by-case basis.

This Consent for Release of Information is a one-time authorization specific to the details of this request only. It does not provide open-ended, delegated access to a student's record for an extended time, such as an entire academic term.

STUDENT INFORMATION		
STUDENT LEGAL NAME (LAST, FIRST, MIDDLE)	STUDENT ID	DATE

AUTHORIZED THIRD PARTY	
NAME (FIRST, LAST)	ADDRESS (STREET, CITY, STATE, ZIP)
RELATIONSHIP TO STUDENT	PURPOSE OF DISCLOSURE E.G., FAMILY, EMPLOYMENT, ADMISSIONS, LITIGATION

**\*All official transcripts requested by a third party must be obtained through the Office of the Heritage University Registrar. Please contact the Registrar's office at 509.865.8684 with any questions relating to obtaining an official transcript.**

I understand that I have the right to: (1) not to consent to the release of my education records, (2) inspect any written records released pursuant to this consent, and (3) revoke this consent at any time by delivering a written revocation to the Department of Nursing University Registrar.

Student Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return completed form to:**

The Heritage University Department of Nursing, 3240 Fort Road, Toppenish WA, 98948