Bridgeport Hospital School of Nursing (BHSN) School Closure Access and Safe Storage of Vital Student Records Policy

I. Introduction

An important part of the School/University's records management program is the identification and protection of vital records. A record is vital when:

- The replacement of a lost or unavailable record would be impossible or prohibitively difficult; and
- Permanent loss of the record would abridge, jeopardize, or otherwise have a major negative impact on a significant right of an individual, a significant right or asset of the School, or the performance of an essential function of the School or University.

II. Purpose

To establish guidelines for the protection of vital records when Bridgeport Hospital School of Nursing (BHSN) closes through:

- Identification of Vital Records
- Establishment of Ownership (Agent Destination of Service for Maintenance of Records & Authority to Release)
- Selection of Secure Method of Protection
- Itemization of Records Transferred

III. Identification of Vital Records

- A. Academic (Complete kept for 7 years; weaned 2013 back to 1940)
- B. Financial Aid (Kept for 3 years; 2014 to present; VA records included)
- C. Financial 1098Ts (Kept for 3 years; 2015, 2016 & 2017)
- D. Health (currently Bridgeport Hospital uses off-site storage through Iron Mountain Incorporated)

IV. Maintenance of Records & Establishment of Ownership

<u>Academic</u>

All academic vital records in hard copy will be organized and prepared for transfer to the University of Bridgeport (UB) according to Bridgeport Hospital School of Nursing (BHSN) policy, *Maintenance of Student Records*.

- A. Per Policy -Content of BHSN Complete Permanent Academic Records (Kept for 7 years 2010-2017) is as follows:
 - 1. All application materials: application, essay, references, proof of citizenship, high school transcript or equivalent, security background check, TEAS report and other official correspondence. References submitted in confidence and for which the student had waived their right to see are not available for student review.
 - 2. Official College Transcripts
 - 3. Program Requirements: Proof of BLS certification, Malpractice insurance, CT Hospital Association (CHA) mandatories including HIPAA, LPN license if applicable
 - 4. Enrollment Agreement

- 5. Documents related to the student's academic progress and signed verification of receipt/understanding, e.g. student education plan, clinical performance evaluations, requests for change in status, clinical /academic warning letters, remediation plans, student nurse clinical skills checklist, receipt of course syllabus
- 6. Correspondence regarding "Information for Students with Disabilities" and any documentation related to the disability
- 7. Student Clearance Form
- 8. BHSN transcript
- 9. Exception: Allied Health Records will additionally have attendance records and evidence of tuition payment according to Office of Higher Education requirements
- B. Per Policy Content of BHSN Weaned Academic Records (after 7 years 2010 back to 1940):
 - 1. BHSN Transcript ALL FILES
 - 2. Any contractual agreement e.g. Enrollment Agreement (2010- present)
 - 3. Student Clearance Form (if applicable; unclear on year started)

Academic records will be **transported** to the University of Bridgeport (UB) on June 1, 2017. *Ownership of Records after Transfer*: UB Office of the Registrar

Financial Aid

The financial aid records for the past three years (2014-2017) in hard copy will be transported (transferred) to UB on June 1, 2017. The content of files will vary depending on specific financial activity needed for the student. Content can include: ISIR, Master Promissory Note, Entrance Counseling, Verification, STX, PTX, Award Letter, Exit Counseling, T2T4 Calculation, and Last Date of Attendance.

Ownership of Records after Transfer: UB Student Financial Services.

<u>Financial</u>

Bridgeport Hospital's Yale New Haven Health System (YNHHS) Corporate Finance will be responsible in storing and maintaining the students' 2017 fiscal year tax documents, 1098Ts. The system will mail the 1098Ts to the students (with labels) in early January 2018. A copy will be sent to the IRS in February 2018 and will also maintain a copy for the YNHHS records. A YNHHS representative was given an educational session on 5/23/17 on how to view financial records in BHSN's School of Nursing Information System referred to as SONIS. YNNHS will host a parallel system of the current SONIS as a information reference and view only as a backup for future questions.

<u>Health</u>

Bridgeport Hospital (BH) will continue to maintain Health records on all nursing and allied health students. BH uses an off-site storage center, Iron Mountain Incorporated) for inactive records.

Ownership of Records- Continuous: Occupational Medicine and Wellness Services (previously known as Industrial Medical Center - IMC) located at 226 Mill Hill Avenue, Bridgeport, CT.

V. Access to Records

The BHSN website will be the means of notification as to Agent and location of records and procedures of obtaining official BHSN transcripts after June 1, 2017. As BHSN reaches closer to the closing date, the BHSN website will be updated.

BHSN graduates and non-graduates (withdrawals) will be able to obtain transcripts from BHSN up to May 31, 2017 and from UB after June 1, 2017. BHSN and UB will comply with the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, to ensure the confidentiality of Student Education Records.

Refer to Policy on Record Requests.

Additionally, the University of Bridgeport shall ensure that BHSN and the Hospital shall have access to Program Records for purposes of defending lawsuits, responding to a licensure examination or inquiry, or responding to inquiries or audits from government agencies.

VI. Selection of Method of Protection

The student academic records and financial aid records in hard copy will be transported to UB in locked, fire retardant file cabinets provided by BHSN. The student academic records will be housed in a secure, locked room of a concrete building that is the *University of Bridgeport Registrar Archives*. BHSN has indexed the records to facilitate retrieval.

The student academic records will be maintained by the UB Registrar Office. The financial aid records will be maintained by the UB Student Financial Services. The health records will be maintained by Bridgeport Hospital's Occupational Medicine and Wellness Services (previously known as Industrial Medical Center - IMC). Bridgeport Hospital stores inactive Health Records off-site with a company that specializes in record storage (Iron Mountain Incorporated). Bridgeport Hospital's Yale New Haven Health System (YNHHS) Corporate Finance will maintain the tax documents and School of Nursing Information System (SONIS) for future financial questions.

VII. Records Transfer Excel Spreadsheet

The University of Bridgeport will arrange to transport the above described records to its facilities on June 1, 2017.

The Director of BHSN will provide *Record Transfer List* and an itemized description of the records via Excel spreadsheet. BHSN and UB will sign the *Record Transfer List and* initial the spreadsheet at the time records are transported to UB. BHSN will endeavor to identify on the spreadsheet any records which it identifies as missing, incomplete or damaged. In any event, UB will not be responsible for any BHSN record which was lost or damaged prior to transport to UB. A copy of the Records Excel Spreadsheet will be sent to CT Board of Examiners for Nursing and ACEN after BHSN closure.

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