**PRELIMINARY EVIDENCE REPORT: Standard 2.C.8**

The institution maintains student records permanently, securely, and confidently, with provisions for secure backup of all files, regardless of the form in which those files are maintained. The institution publishes and follows established policies for release of student records.

**Evidence of Meeting the Standard**

**Thesis Statement:**

All student electronic data (credit programs) is protected by our system-wide student information system, Banner. Banner is maintained and electronically back-up by the University of Hawaii system-wide Banner Central team. Access to electronic student information is granted by campus administrative approval. Level of access to student data is determined by position and need for access to confidential information. All individuals granted accesses to student data in Banner are required to sign a confidentiality agreement (reference to policy below). As an added safety measure, all student social security numbers in Banner are restricted (UH policy on use of SSN’s). Only a few individuals on each campus may view this data.

**LIST OF EVIDENCE:**

* Policy on the restricted access to student social security numbers (EP 2.214)
* Students are issued randomly generated student identification numbers. The College does not use Social Security Numbers to identify students (EP 2.214).
* The College strictly follows the Family Educational Rights and Privacy Act of 1974 (FERPA) (KapCC Catalog, 20016 – ’17, pages 66 - 67)
* Policies for the release of student records and provisions of FERPA are detailed in the College Catalog pages 66-67
* Students may access their individual password-protected records in their STAR portal. (Screenshot)
* Confidentiality form required for all persons with access to student data (UH 92).
* Screenshot of secure access to Banner
* Student Employment Checklist - General Confidentiality Agreement for student employees with limited access to student data or records (Student Employment Checklist)
* Copy of the FERPA policy is made available to all students in the College’s main admissions and registration office (Handout of FERPA policy attached).
* The following is a list of College offices where confidential student data may be handled and record keeping practices at those locations:

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| Student Health Records | Tuberculosis and Measles, Mumps and Rubella vaccinations are kept indefinitely. Currently, they are kept in the original paper format submitted to the College. Currently these records are stored in the College’s secure records depository. The College has plans to move to a scanning and electronic storage of these documents.  |
| Non Credit Program | Currently student records such as attendance and completion data are maintained by the teaching faculty in confidential files. Registration and payment information is held in a confidential student information system – Destiny. Destiny is a student information/registration system which is used at all campuses with in the University of Hawaii Community Colleges. |
| Veterans Student Program | Records concerning veterans such as Veteran Administration forms and student records are scanned into a secure local area network and retained after 3 years of the veteran's last semester of attendance. |
| International Student Program | Records such as confidential bank statements, transcripts and health records are viewed for the admissions and the I-20 purposes then transferred to central records for secure storage. Any confidential student records which may be held in the office are locked in secure files daily. Rotation and shredding of this information follows the same policies pertaining to all credit records. |
| Financial Aid | Financial Aid paper records are retained in locked fireproof file cabinets in the Financial Aid office for current students. Records are retained for 5 years after the departure of a student. For non-current students, records are rotated to the on-campus secure storage unit, and then rotated for shredding on a five-year rotation.  |
| Mental Health Counseling | Licensed Mental Health Counselor maintains records in two confidential formats. Written files consist of every contact made with students include consent forms, summary of counseling sessions and casual contacts. These records are securely maintained in a locked file cabinet located within the office. Records are also maintained in a locked electronic file. Examples of these records include any electronic communications, faxes, etc. All files are maintained (as required by law) for seven years. After which time, they are securely disposed of.  |
| Disabilities Office | The Disabilities Office maintains confidential student records in a locked file cabinet at all times. Each semester the files are checked to see if the student is still active at the school. Upon the student being inactive for 5 years or more, the file is shredded.  |

**Evaluation and Analysis**

The college maintains hard and electronic copies of student permanent records in a secure and safe environment to protect them from breach of confidentiality. The college adheres to the Family Educational Rights and Privacy Act (FERPA). Information on FERPA is available in the college’s catalog, as well as in paper form in the lobby of the main admissions and registration office. The University of Hawaii further enhanced policies on protecting student privacy with the creation of policy EP 2.214 which prohibits the use of student social security numbers to be used as a source of identification in daily access of student files.

Only approved staff members have access to student electronic files that contain social security numbers. The main student services area that houses sensitive student records is restricted to only select staff members with approval. The main electronic student information system is password protected. Electronic maintenance and back-up of this system is managed by a University of Hawaii system team at the University of Hawaii at Manoa campus. The college believes that it meets the Standard.

**Actionable Improvement Plan**

Create electronic and permanent recordation of student records in the noncredit registration system. Currently the noncredit registration system is primarily a cashiering function and not a student records system.