

CLOSED OR MERGED INSTITUTIONS

GUIDANCE AND BEST PRACTICES PERTAINING TO STUDENT EDUCATION RECORDS



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AACRAO

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Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records

The American Association of Collegiate Registrars and Admissions Officers (AACRAO) is a non-profit, voluntary, professional association of more than 11,000 higher education professionals representing approximately 2,600 institutions in more than 40 countries. Its commitment to the professional development of its members includes best practice guidance on admissions strategies to meet institutional diversity objectives, delivery of academic programs in innovative ways to meet the needs of a changing student body, and exemplary approaches to student retention and completion.

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INTRODUCTION

BACKGROUND

The anticipated increase in institutions of higher education (IHE) closings due to declining enrollments, decreasing budgets, and the ‘for-profit implosion,’¹ will result in a growing number of students left with incomplete educations and many questions about their academic plans and personal finances. A recent analysis found that more than 1,200 campuses shuttered in the last five years, displacing nearly half a million students.²

In addition, more higher education leaders have been looking at mergers as a means to ensure institutional viability and financial security. Mergers can take many shapes and forms, including partial (involving select programs or divisions) to total mergers in which one institution is absorbed into another, or a new institution emerges from two or more that cease to exist under their former academic structure. Some experts estimate that as many as 30 percent of American higher-education institutions should potentially merge.³

The closing IHE bears a significant responsibility to ensure the secure transfer and safe-keeping of its student education records. However, guidance for both the closing and receiving IHE/entity will help school officials ensure that records of the closed IHE are preserved and that students do not suffer undue burden and stress as a result of the closure.

THE CHARGE

Building on the recommendations and guidance for IHE closings as published in the AACRAO publications *Academic Record and Transcript Guide* and *Student Records Management: Retention, Disposal, and Archive of Student Records* as well as in the newly revised CAS Standards for Registrar Services, the AACRAO Board of Directors charged the work group with the development of clear and comprehensive guidance and best practices for both the closing and receiving IHE or entity as they pertain to student records and student support.

To obtain more detailed information on effectively interpreting and sharing academic records, refer to the 2020 AACRAO *Academic Record and Transcript Guide*. For additional information regarding best practices in records management and institutional records retention and disposition schedules, refer to the 2019 AACRAO *Student Records Management: Retention, Disposal, and Archive of Student Records*. To order these and other professional development resources published by AACRAO, visit <https://www.aacrao.org/research-publications/online-bookstore>.

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GLOSSARY OF TERMS

Closed/Closing Institution

The institution of higher education at which a closure has occurred/is occurring.

Data Custodian

The institution of higher education or entity who has administrative and/or operational responsibility over institutional data.

FERPA

The Family Educational Rights and Privacy Act of 1974, as amended (20 U.S.C. 1232g; 34 CFR Part 99).

Merged/Merging Institution(s)

The combined result of the sending and receiving institution (as defined below).

Receiving Institution

The institution of higher education that becomes the data custodian for a closing or merging institution's student education records.

Sending Institution


The institution of higher education that is merging into the receiving institution.

Teach Out

The process by which an institution of higher education fulfills its educational and contractual obligations to currently enrolled students before voluntarily closing a program the institution offers or before closing the institution.

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THE WORK GROUP



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GUIDANCE AND BEST PRACTICES FOR CLOSING INSTITUTIONS PERTAINING TO STUDENT EDUCATION RECORDS

The following guidance is based on information from AACRAO's Academic Record and Transcript Guide and Student Records Management: Retention, Disposal, and Archive of Student Records. The updated guidance and best practices reflect evolving records management practices and requirements.

In the event that an institution of higher education ceases operations, arrangements should be made with the state board for higher education or another appropriate agency for custodial care of student records. If there is no state agency which can receive records, arrangements should be made with an accredited college or university within the state or the state archives to preserve the records. It is the responsibility of the closing institution to ensure that its records are moved to a location accessible to former students. It is important to be familiar with current state regulations, as some states require that an institution designate who will maintain their records should it ever close.

Prior to the transfer of records, the records should be carefully reviewed (see below for specific considerations). To minimize storage or transfer costs, the closing institution may wish to destroy non-permanent records that are past the period of required retention. For example, if state law requires that certain records be retained for 10 years, records that are more than 10 years old should be destroyed. Absent federal regulations, state and local laws should be observed. Observing the longest prevailing retention period is prudent. A comprehensive review of all records needed for fiscal and legal closure should also be made and provided to the administration or to the agency supervising the disposition of the charter and property.

Notification of closure must be sent by the closing institution to the state agency governing higher education, the information officer for the state legislature, the accrediting body for the institution and particular discipline(s), AACRAO, vendors under current contract, and, in the case of private institutions, the sponsoring organization. For information regarding this issue, see Appendix A, "State Policies Covering Disposition of Academic Records of Closed Schools" (on p. 26), see also Appendix B, "State Records Management Resources/Retention Schedules (on p. 32)."

The closing institution must also send a notification of closure to every current and former student, where feasible, indicating which records are being stored, where the records are being stored, and what the accessibility to those records will be. Additionally, in advance of the records transfer, the closing institution should notify current and former students of the deadline for requests to make changes to records.

FERPA Considerations for Closing Institutions

Upon realization that an institution will no longer be solvent and will cease to exist, the closing institution should reach out to the entity, organization, or state agency that will be the new data custodian of the education records from the closing school. The closing institution should inform the receiving institution/entity of the impending closure, as soon as can be publicly

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known, for the receiving institution/entity to plan accordingly for the arrival of the education records. A full state-by-state breakdown of “State Policies Covering Disposition of Academic Records of Closed Schools” can be found in Appendix A (on p. 26). For additional information regarding this issue, see Appendix B, “State Records Management Resources/Retention Schedules (on p. 32).”

The state-designated receiving institution/entity should be aware that, once a school has closed and the education records are in its custody, all students of the closed institution will still have the right to inspect and review their education records. Additionally, the receiving institution/entity will be responsible for complying with any such requests by students to access those records, as long as those records are maintained by the receiving institution/entity.

Checklist for Closing Institutions

In order to ensure a smooth transfer of the management of student records, it is suggested that the closing institution follow the steps below. This checklist pertains only to student records maintained by the Registrar’s Office, and does not have to be followed in the order listed. It is important to note that the closing institution may need to begin preparing the student records for transfer, prior to knowing which institution or entity will be receiving the records.

- Notify all current and former students that their records will be accessible by contacting the identified entity/receiving institution. This can be done through a website. As a courtesy, the closing institution should notify the current students using free methods of communication (email, school newspaper, institution strategic communication office).
 - In advance of the records transfer, the closing institution should notify current and former students of the deadline for requests to make changes to records.
- Determine an effective date for the transfer of records. Following such a date, all requests for records access should be directed to the receiving institution/entity. Ensure this is communicated to current and former students.
- Identify a contact at the receiving institution responsible for ensuring the effective and secure transfer of these records.

Considerations include:

- Whether the closing institution has a combination of hard copy transcripts and electronic transcripts.
- Whether the receiving institution will have access to the closing institution’s student information system.
- How students will order transcripts or replacement diplomas once the institution closes.
- Whether the closing institution is the data custodian for any other closed institution for which records must also be transferred.
- Create an inventory of all student files, listing record types, file formats (hard copy, PDFs, microfiche, etc.) and the years/ population of students for each format for the receiving institution.
- Follow the closing institution’s records and retention policies to appropriately destroy records that do not need to be transferred to the receiving institution.
- Records from the closing institution should ideally be provided to the receiving institution/entity electronically, or in the original file format (e.g. microfiche or hard copy on non-safety paper, preferably with the name of the closing institution included on each document).
- Arrange for non-electronic files to be safely transported to the receiving institution/entity. Have all files arranged in an order (e.g. by last name, year, etc.) and reflected on a records inventory list.
- Consider removing all holds that would prevent a student from receiving a diploma and/or transcript if the financial obligation will not follow the students’ records to the receiving institution.
- Contact the appropriate accrediting agency to ensure all regulations and guidelines are being followed in the transfer of the records.

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GUIDANCE AND BEST PRACTICES FOR RECEIVING INSTITUTIONS RETAINING STUDENT EDUCATION RECORDS FROM CLOSING OR MERGING INSTITUTIONS

The following guidance is based on information from AACRAO's Academic Record and Transcript Guide and Student Records Management: Retention, Disposal, and Archive of Student Records. The updated guidance and best practices reflect evolving records management practices and requirements.

Data Custodians for Closing or Merging Institutions

For receiving institutions that are charged with maintaining records from closing or merging institutions, the following guidance is suggested:

- Prior to the transfer, the records should be carefully reviewed for accuracy, and against the closing institution's retention policy in order to minimize storage or transfer costs.
 - The sending institution may wish to destroy non-permanent records that are past the period of required retention. For example, if state law requires that certain records be retained for 10 years, records that are more than 10 years old should be destroyed. Absent federal regulations, state and local laws should be observed. Observing the longest prevailing retention period is prudent.
- Records transferred to the custody of the receiving institution should be appraised and categorized upon receipt in a manner that is consistent with that institution's record management program.
 - If the inventory reveals a new record type, or series, the receiving institution's retention schedule should be amended to include the new record series.
 - Once incorporated into the receiving institution's record management program, the records from the sending institution should be managed according to the receiving institution's records management policy.
 - As technology changes, make appropriate changes to data storage and transmission in compliance with state regulations.
- Where possible, and depending upon policy, resources, and capacity, receiving institutions should allow access to records for research purposes. However, that access should be limited to academic need or genealogy.

Academic Documentation

Best practices for receiving institutions issuing diplomas or transcripts, and certifying records for a **closing/closed institution** include the following:

- Following the published effective date for the transfer of records, all records or documents should be produced in a manner consistent with the receiving institution's records management and dissemination policies.
- All records or documents produced should clearly identify the name of the closed institution.
- All paper documents issued by the receiving institution should be produced securely, preferably with the name of the closed institution included.
- A statement should be included in the key or legend verifying the authority of the data custodian to provide these

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documents, such as:

“The suggested legend should be revised slightly as follows (changes highlighted): “At the request of [name and location of closed school], [name of data custodian] has accepted custody of the academic records of [name and location of closed school] and has agreed to provide copies of documents contained in those records, upon request, and subject to the provisions of the Family Educational Rights and Privacy Act (20 U.S.C. 1232g; 34 CFR Part 99) and other relevant laws. [Name of data custodian] makes no judgement as to the validity, content, or rigor of any course or program represented on the documents.”

- Consider removing all holds that would prevent a student from receiving a diploma and/or transcript if the financial obligation will not follow the students’ records to the receiving institution.

Best practices for receiving institutions issuing diplomas or transcripts, and certifying records for a **sending institution** include the following:

- Following the published effective date for the transfer of records, all records or documents should be produced in a manner consistent with the receiving institution’s records management and dissemination policies.
- All records or documents produced should clearly identify the name of the sending institution.
- Where possible, paper documents issued by the receiving institution should be produced securely, preferably with the name of the sending institution included on each document. If this is not practicable, include an explanation that the sending institution is closed but the document is official.
- A statement should be included in the key or legend verifying the authority of the receiving institution to provide these documents, such as:

“At the request of [name and location of sending school], [name of data custodian] has accepted custody of the academic records of [name and location of sending school] and has agreed to provide copies of documents contained in those records, upon request, and subject to the provisions of the Family Educational Rights and Privacy Act (20 U.S.C. 1232g; 34 CFR Part 99) and other relevant laws.”

- Consider removing all holds that would prevent a student from receiving a diploma and/or transcript if the financial obligation will not follow the students’ records to the receiving institution.

Fees for Transcripts

Receiving institutions may charge a reasonable and customary fee for fulfilling student transcript requests for a closing/closed or sending institution.

FERPA Considerations for Receiving Institutions

Once an institution closes or merges and the student education records are transferred to the receiving institution, organization, or state agency identified by the state as the new data custodian of the education records, the receiving institution/entity should be aware that all current and former students will still have the right to inspect and review their education records and that the receiving institution/entity will be responsible for complying with any requests by students, current or past, to access those records, so long as those records are maintained by the receiving institution/entity.

Additional Considerations Regarding Student Education Records from Closing Institutions

Once an institution becomes the data custodian for a closed institution, it is prudent for the receiving institution to develop a policy regarding making changes to those records. In almost all instances, the records are considered frozen once the institution closes because the institution no longer exists and therefore cannot make record changes. State retention laws will often offer guidance on such topics. For more information regarding policies covering the disposition of academic

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records of closed schools, see Appendix A, “State Policies Covering Disposition of Academic Records of Closed Schools” (on p. 26), see also Appendix B, “State Records Management Resources/Retention Schedules (on p. 32).”

GUIDANCE AND BEST PRACTICES FOR INSTITUTIONS INVOLVED IN FULL OR PARTIAL MERGERS

The higher education landscape is constantly evolving. As institutions face rapid changes in student demographics, technology, communications, funding, enrollment decline and other factors, leaders are increasingly considering mergers as a means to ensure institutional viability and financial security. Mergers can take many shapes and forms, including partial (involving select programs or divisions) to total mergers in which one institution is absorbed into another, or a new institution emerges from two or more that cease to exist under their former academic structure. Some experts estimate that as many as 30 percent of American higher-education institutions should potentially merge.⁴ The COVID-19 pandemic had an additional impact on the number of campuses considering such a move. This section focuses on guidance and best practices that specifically relate to institutions of higher education that are involved in full or partial mergers.

Institutional Name Changes

During a full or partial merger, institutional name changes are possible. State and accreditor guidelines may inform the process, and what follows are some considerations and best practices.

Considerations

- The institutional name reflected on the records of former students as well as that on students who were enrolled at the time of the merger.
- The need to preserve and honor the name(s) associated with the merging institution(s).
- The investments made by donors to existing facilities, as well as the social and emotional impact of a name change on current and former students.⁵
- The cost of replacing signage, letterhead, logos, athletic jerseys, and transcript paper, among other branded items.

Recommendations

- Follow any existing state/accreditor guidelines regarding how to change name.

Maintaining Education Records for Students Enrolled in the Sending Institution Prior to the Merger

Whether involved in a full or partial merger, the receiving institution must develop policy that governs how records received from the sending institution should be stored, and whether updates to records will be allowed. The policy should address information technology needs, how transcripts and diplomas for students who left the sending institution prior to the merger shall be stored and produced, and how to respond to requests for updates to academic records, and biographical data.

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Student data and student information system (SIS) experts at the sending institution can help identify record types and address coding and procedural questions. It is vital that the two institutions work closely together to ensure a smooth transition of data. Working collaboratively to gather information early is essential.

Considerations

- Different formats in which records are currently stored, such as hard-copy, digital copy, and microfiche; the information and document storage systems of both the sending institution and the receiving institutions; and how data will be transferred or integrated between systems.
 - As technology changes, make appropriate changes to data storage and transmission in compliance with state regulations.
- Additional decisions required during the merger, including changes to bio/demo data (i.e. name, address, or sex) and where these changes are processed and stored.
 - For example, if the receiving institution determines that there will be no academic changes or appeals of former grades earned in the SIS, consider whether it will allow for changes to name, address, sex, or gender. see also Consideration of Other Records: Student Identity (on p. 22).

Recommendations

- Plan the transfer of education records in two parallel phases:
 - Phase 1 - review active records, or those records pertaining to current students that are needed by the receiving institution to continue with operations
 - Utilize subject matter experts to define needs, formatting, and a timeline
 - Short-term teams may be needed to define active record reporting needs
 - Each record type needs a project plan and tracking system for transferring files
 - Phase 2 - review historical records
 - Review historical record types against existing record retention and archival policies
 - Make recommendations for archiving records based on retention policies
 - Each historical record type will need a project plan and tracking system
- Records from the sending institution should ideally be provided to the receiving institution electronically using secure means while ensuring data privacy, or in the original file format (e.g. microfiche or hard copy on non-safety paper, preferably with the name of the sending institution included on each document).
- Conduct a review of all student academic records in a timely manner to assist in the development of data sharing files during the transition.
- For historical records, the receiving institution will make final recommendations for the retention of each record type within their retention schedule.
- Records involved in a merger will contain personally identifiable information (PII).⁶ All parties should use reasonable methods to protect the PII contained in the student education records from further disclosure, except as otherwise permitted under FERPA.⁷
- The receiving institution should preserve the sending institution's records in a way that identifies the coursework taken and any awarded degrees or certificates earned through the sending institution.
- Clear communication across units that manage education records is necessary during the merger. Take under consideration that administrative units or systems may be phased out as part of a merger.

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- The sending institution shall determine the final date of any academic record changes, prior to the merger, such as grade changes, grade or late withdrawal appeals, incompletes, incomplete extensions, or exceptions to remaining degree requirements.
 - Students should be notified of the upcoming merger, and that all pre-merger academic records will be sealed as of a specific date. Students should be given ample time to request a review of their academic record, as well as request amendments to the record, prior to the merger.
- Non-academic data such as legal name, addresses and other contact information, as well as other biographical information should continue to be maintained and updated with proper documentation, following the receiving institution's policy for such changes.

FERPA Considerations for Receiving Institutions

Once an institution closes or merges and the student education records are transferred to the receiving institution, organization, or state agency identified by the state as the new data custodian of the education records, the receiving institution/entity should be aware that all current and former students will still have the right to inspect and review their education records and that the receiving institution/entity will be responsible for complying with any requests by students, current or former, to access those records, so long as those records are maintained by the receiving institution/entity.

Communication to Students Regarding Records Access

Recommendations

- Communicate early and often to affected students.
- Ensure that a simple internet search of the sending institution's name returns the receiving institution's website.
- Notification of merger or closure should be sent by the sending institution to every current and former student, where feasible, indicating which records are being stored, where the records are being stored, and what the accessibility to those records will be.
- Additional agencies that must be informed of an institution's closure or merger include the state agency governing higher education, the information officer for the state legislature, the accrediting body for the institution and particular discipline(s), AACRAO, vendors under current contract, and, in the case of private institutions, the sponsoring organization. For information regarding this issue, see Appendix A, "State Policies Covering Disposition of Academic Records of Closed Schools" (on p.26), see also Appendix B, "State Records Management Resources/Retention Schedules (on p. 32)."

Record Retention for Merging Institutions

As data custodians, registrars take record retention very seriously. It is easy to get overwhelmed thinking of the volume of records involved when contemplating the incorporation of one institution into another. One can imagine reactions on both extremes, from keeping everything, to shredding it all, and all variations in between. As noted in *Student Records Management: Retention, Disposal, and Archive of Student Records*, "[a]lthough records managers often believe it is better to retain records in case a need arises, if the institution's stated policy is to purge records after a certain period, that implicit guarantee should be followed."⁸ It is ultimately quite good to be able to say, "In accordance with our record retention schedule, we no longer retain the records about which you are inquiring."

Thinking of the task at hand, our guidance is to be practical. Keep only what is required and follow safe destruction (record of destruction documentation) principles on site at the sending institution to minimize moving expenses and management responsibilities. The record retention schedules for both institutions are the best guides.

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Considerations

- Location and format (hard copy vs. digital) of records to be retained.
- Whether SIS records will be retained.
- How to manage the records of currently enrolled students (those bridging their enrollment between both sending and receiving institutions) vs. the records of former students.
- How records will be transmitted between institutions (e.g., electronic transfer vs. boxed and moved). Decisions on managing former students' records are needed, but also consider currently enrolled students who will need to be transitioned to the new system for account credentials (ID#, SIS access, ect) as well as degree audit and degree conferral.
- Modes of, and systems involved in, record retrieval.

Recommendations

- Use the Merging Institutions Record Retention Worksheet (See Appendix C on p. 35) to compare the record retention schedules of both institutions. This can be a good tool to facilitate conversation between sending and receiving institution registrars and record managers. If some records held by the sending institution are not addressed in the receiving institution's retention schedule, add them to the schedule and update the revision date of the retention schedule.
- Over time, receiving institutions should come to manage sending institution records according to their schedule, but in cases where the sending institution's retention time period is longer than that of the receiving institution, honor the longer time period for those records until that schedule can be ended, managing all records under the schedule of the receiving institution. Once a merger is complete, all records should be retained and managed under the receiving institution's retention schedule; the sending institution's retention schedule is phased out.
- If one institution does not have a retention schedule (or does not actively follow the schedule they have in place), it is best to follow the other institution's schedule. If neither institution has a retention schedule in place, please contact AACRAO for guidance.

Current Articulation Agreements

Considerations

- Whether the receiving institution will recreate all articulation agreements (and other contracts) in force at the sending institution at the time of the merger.
- Whether the conditions of the merger require the receiving institution to do so.
- Whether the receiving institution is required to obtain additional licensure, etc., in order to provide the programs and services required by the sending institution's articulation agreements.

Recommendation

- Be aware of all articulation agreements (and other contracts) being used at the sending institution.

Merging Academic Calendars & Course Scheduling

The academic calendar defines the milestone dates that drive so much of the daily operations of a college or university. When two institutions merge, the existing academic calendars will likely not match up perfectly, and will need to be reworked.

It may be tempting to just "leave it as is" especially if students will be unlikely to attend between campuses. However operating a college or university with multiple calendar systems can create discord between programs and departments, and results in lost synergies and increased administrative burden. Harmonizing the academic calendars might seem like a

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monumental task, however there are some benefits of operating on a single calendar system, including:

- Reduced restrictions on student enrollment (no worry about “overlapping terms” or “overlapping aid years”).
- Increased ability to streamline processes and create administrative efficiencies.
- Opportunities for consistent policies and deadlines.
- Increased ability for creative, interdisciplinary academic programming.
- Avoids costly additional administrative oversight to ensure compliance with Title IV regulations.
- Reduced National Student Clearinghouse or National Student Loan Data System reporting burden.
- Common term end dates allow for conferral dates and commencement ceremonies at appropriate times for all students.

Considerations

- Whether the sending institution and the receiving institution both operate on the same term structure (Semester, Trimester, Quarter), or non-standard terms. If not, consider the possible financial aid implications.⁹
- How differing calendar systems can be harmonized during the merger without resulting in lost program integrity.
- Whether there are any collective bargaining agreements which restrict term start and end dates, or break dates.
- Whether class scheduling norms line up, such as standard meeting patterns (days of the week, length of class meetings), and contact hour calculations.
- Consider if faculty will need to be engaged to re-work syllabi if meeting patterns change.
- Whether enough rooms will be available if courses from one institution are now meeting at the other. Pay special attention to specialized room needs, such as labs, studios, etc.
- Exam schedules for programs with which you are unfamiliar.
- Whether either school uses reading days. If so, it would be beneficial to explore how reading days are defined and what course activity (if any) is permitted on those days. Additionally consider whether any programs traditionally use them for related activities (e.g. seminars, make up work, poetry readings, etc.).

Recommendation

- Calendar harmonization should be a top priority during a merger.

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STUDENT RECORD IMPACTS WHEN TEACH-OUT PLANS EXIST

When an institution is closing or when two or more institutions merge, the impact on currently enrolled students can be profound. The investment a student makes when pursuing a degree can be measured both in terms of money and time. A teach-out agreement can fulfill the educational and contractual obligations to those currently enrolled students.

Federal regulations implemented in the Higher Education Opportunity Act stipulate that, under certain circumstances, accrediting agencies must require a teach-out plan from an institution.¹⁰ Accrediting agencies establish the criteria institutions must meet when submitting a teach-out plan; thus, there are no standard components of a teach-out plan.¹¹ Typically, in a teach-out plan, an institution may be required to include provisions for students to complete their programs of study within a reasonable amount of time, send a communication to affected parties (e.g., faculty and students) informing them of the impending closure or merger, and share information detailing how students may access their institutional records.

Considerations

Regarding records when a teach-out plan exists:

- Whether the teach-out plan includes the option for students to earn their degree under the name of the sending institution for a period of time after the merger is complete, and if so, how these data and degrees will be recorded and stored.
- If student information systems are not merged, consider:
 - Whether there is sufficient knowledge in the use and support of the system within each relevant functional office (Admissions, Registrar, Financial Aid, Bursar).
 - Whether there is sufficient expertise in central IT to support an additional enterprise tool.
- If student information systems are merged, consider:
 - Whether course schedules and registration data will be imported, or academic history only (i.e. courses, grades, and degree records).
 - Whether admissions records, holds, fee assessment, student accounts and financial aid records will be imported.
 - How degrees/majors/minors/concentrations/tracks awarded by the sending institution will be identified.
 - If both institutions offered the same curriculum, how the degrees/majors/minors/concentrations/tracks (with different requirements) awarded by the sending institution and the receiving institution will be distinguished from one another.

Regarding communication with students when a teach-out plan exists:

- Consider whether students will be given the option to opt-out of the teach-out plan, and if so, how that decision will be communicated, tracked, and stored.

Recommendations

- When a teach-out plan exists, eligible students should be identified and notified as soon as possible.

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- Students should be made aware of their right to graduate under the teach-out plan, or their right to opt-out of the teach-out plan (if given the option).
- All relevant deadlines and processes should be communicated early and often.
- Perform a degree audit with each student, to ensure a shared understanding of all outstanding degree requirements.
- Secure documentation of any exceptions to degree requirements (course substitutions, etc.) approved by the sending institution at an individual student level.¹²
- Clearly define any policy regarding a student's ability to take courses elsewhere for transfer (e.g., limits in number of courses or credits; applicability to major, minor or general education requirements).
- Determine how to track students who are affected by the teach-out plan, and how to handle those who are unable to complete their degree before the teach-out period expires.

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TRANSFER OF EARNED CREDITS, COURSE SYLLABI, & CATALOGS

When two institutions merge, the assignment of credits must be reviewed for both the purpose of accurately representing the records of existing students, as well as assigning credit appropriately post-merger. The credit hour is the unit used to represent courses quantitatively, and every institution must define how a credit hour is calculated. Usually, the number of credits assigned to a course is determined by the number of in-class hours per week, and those hours can vary from institution to institution.

The U.S. Department of Education's definition of a credit hour equates a single credit to not less than 1 hour of direct faculty instruction, and a minimum of 2 hours of out of class student work each week, with adjustments made for programs that do not follow the traditional 15-week semester schedule, or include lab or studio work, or other non-lecture types of instruction.¹³

Additionally, registrars are often called upon to provide historical documentation of course content, typically found in either course syllabi or catalogs.

Considerations

- Whether changes to credit hours are required, and how it might impact the degree progress of current students.
- Whether the pre-merger documents (catalogs, syllabi, etc) will be made available on a public website for a specified period of time after the conclusion of the merger.

Recommendations

- The sending institution should ensure that their credit hour calculation is defined in their academic regulations, and that all courses offered post-merger contain the correct number of contact hours. If credit hours were calculated differently between institutions pre-merger, a conversion should occur when the existing student records are converted into the merged institutions' SIS, and any discrepancies or changes, noted in the legend of the academic transcript.
- The transfer of course syllabi and catalogs from the sending institution to the receiving institution should follow record retention guidelines as outlined in AACRAO's *Student Records Management: Retention, Disposal, and Archive of Student Records*, and the receiving institution's retention policy.

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Use the following checklist to guide your decision making.

	Sending Institution	Receiving Institution
Unit of Measure	<input type="checkbox"/> Semester hour <input type="checkbox"/> Quarter hour <input type="checkbox"/> Other	<input type="checkbox"/> Semester hour <input type="checkbox"/> Quarter hour <input type="checkbox"/> Other
Hours per Week required		
Weeks per Term required		
Department responsible for the collection and archiving of course syllabi		
Department responsible for the collection and archiving of course catalogs		
Storage Medium (electronic, physical, etc)		

Managing Course Records

It is likely that each institution has a standard naming convention for course subjects, general education requirements, and modes of instruction (to name a few). Data custodians will need to work closely with academic affairs to properly store, archive, and convert course records.

Considerations

- Whether the receiving institution will continue to offer all courses previously offered by the sending institution.
- Whether general education requirements are different between institutions.
- How course attributes (such as “writing intensive”) are recorded, and how the attributes of the sending institution will map to the attributes of the receiving institution.

Recommendations

- Following a thorough review of the course catalog by Academic Affairs, registrars should transfer the entire course catalog from the sending institution to the receiving institution to ensure accurate historical transcript production. If courses are not to be offered again, document the retiring of those courses following the receiving institution’s standard protocols.

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CONSIDERATION OF OTHER RECORDS

In addition to student education records, there are numerous other records associated with individual students that institutions retain. While the work group's primary purpose focuses on guidance and best practices regarding education records, there are other considerations related to records not routinely maintained or managed by registrars, including financial aid and veteran benefits records, among others. This section provides additional guidance and resources for a variety of records that a receiving institution may be asked to retain. However, it should not be regarded as a comprehensive review of all types of records which should be considered.

In the event that the Department of Education (ED) or Veterans Affairs (VA) requests an audit of former education records, the data custodian should be able to address whether they can accommodate these types of requests. Late adds/drops, grade changes, degree posting, program/plan changes were most likely processed by the closed or sending institution (including financial aid and payment services). Preferably, staff from the sending institution will still be available to help process requests. Allow time for functional business units to identify additional business/legal requirements for accessing historical student data (i.e. records within financial aid, payment services/bursar, holds on academic records, international students, veteran administration audits, ED, and 1098T).

Financial Aid Records

All information used to determine Title IV eligibility must be accessible for three years following the end of the award year in which the Fiscal Operations Report and Application to Participate (FISAP) was completed. For example, if the FISAP was completed on 9/30/2019 for the 2018/19 academic year, the institution would need to be able to access the information in some manner until June 30, 2023. This does not mean a campus needs to maintain the SIS, but they would need access to the data in some manner. This includes admission information and enrollment history information.

Medical or Treatment Records

Medical or treatment records at postsecondary institutions are exempt from the definition of education records so long as they are only shared with other treatment providers.¹⁴ Once these records are shared with any party other than another treatment provider, they become education records by definition. Thus, any treatment records that are transferred from a closing or sending institution to a receiving institution would become education records, unless they are transferred directly from the treatment venue at the closing or sending institution to the health or counseling personnel at the receiving institution.

Veterans Benefits Records/Transfer of Benefits

Many registrars find themselves responsible for managing enrollment reporting and certification of education benefits for veterans and their dependents. These records must be taken into consideration when schools close or merge, as the receiving institution/entity may be subject to audit by the Department of Veterans Affairs (VA) following closure/merger.

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records

Terms Used

- ELR: Education Liaison Representative
- SCO: School Certifying Official
- POC: Primary Point of Contact
- YR: Yellow Ribbon Agreement
- VA: US Department of Veterans Affairs

Considerations

In addition to reviewing and retaining the veteran benefit records themselves, schools should:

- Notify their ELR¹⁵ of the closure or merger.
- Notify their State Approving Agency¹⁶ of the merger/name change.
- Designate new SCOs or Primary POCs for every campus or branch location.
- Determine if the closed or merged institution will have a single administrative point of contact for VA benefits, or if the administration of benefits will be segmented by campus.
- Review each existing Yellow Ribbon agreement, and modify if necessary.
- Determine where and how records will be held.
- Communicate early and often to affected students.
 - Reach out to all students currently using benefits.
 - If SCOs are changing due to the closure or merger, introduce the new SCOs.
 - Reassure students that they are in good hands.
 - If the YR Agreement is not changing, reassure students that their benefits will not change due to the closure or merger.
 - If the YR Agreement will change, notify students of the changes (if there are a low number of benefit recipients, consider a personalized letter/email detailing how the changes will impact them).
 - Designate a POC for questions/concerns.
 - Communicate the expected change-over date.

Recommendations

Veteran benefit documents should be retained according to the VA guidelines, which state that the following student records must be retained for at least three years after termination of enrollment:

- Previous education or training (transcripts from other colleges and source documents for other nontraditional credit).
- Evidence of formal admission.

The regulations state that longer retention will not be required unless a written request is received from the General Accounting Office or the VA, no later than 30 days prior to the end of the 3-year period.

In the event of an open audit, records must be retained until all questions are resolved.¹⁷

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records

Use the following checklist to guide your decision making.

Type of Record	Retention Plan	Subject to Outside Governance	Current Storage	Future Storage
Example 1	3 Years	Yes	Hard-copy	Digital
Example 2	N/A	No	Hard-copy	Transfer to Military Services office

Veteran education benefit records are some of the few records a registrar might be responsible for that are subject to outside audit, and have a significant impact on the financial well-being of a student. It is essential to follow the VA's guidance for record retention, and to ensure the receiving institution has access to the materials it would need during an audit. Communicate early and often with students who use veteran benefits to fund their education, and ensure they know who to contact if they have questions.

Student Financial Records

Additional information and resources on merging institutions from a business office perspective from the National Association of College and University Business Officers (NACUBO):

- Webinar 1: NACUBO: Pre-Merger Process, Lessons Learned¹⁸
- Webinar 2: NACUBO: Lessons Learned from the Merger Front¹⁹
- Webinar 3: NACUBO: What are the Challenges of Merging Two Colleges?²⁰

Student Identity

- In general, with regard to student education records from closing or merging institutions, records from the closing or sending institution should be managed according to the receiving institution's records management policy.
- State law may dictate whether sex marker or name changes in recognition of sex marker changes are allowed.
- Whenever possible, AACRAO strongly encourages institutions facilitate name changes in recognition of sex marker changes.²¹
- Consult legal counsel when determining institutional policies regarding name changes in recognition of sex marker changes.

International Students

Receiving institutions should maintain records of international student documents related to the student's entire time at the institution for 3 years following the last term of attendance. Such documents include Alien Registration Receipt Card; DS-2019; employment authorization (work permits), if granted; I-20; I94 Card (copy); passport number; Statement of Educational Costs; and Statement of Financial Responsibility.²²

**Closed or Merged Institutions:
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TECHNOLOGY AND REPORTING CONSIDERATIONS

In today's digital world, student records are rarely stored exclusively in hard-copy. Therefore, it becomes imperative for data custodians to understand, and be involved in, discussions regarding the merging or sunsetting of any student information systems as a consequence of a merger.

General Technology Considerations

- Whether the receiving institution should continue operation of the sending institution's SIS and for how long, if so.
 - Whether the receiving institution needs training on the sending institution's software.
 - Whether there is adequate IT support for multiple student information systems.
 - Financial costs associated with maintaining the sending institution's SIS.
- If the receiving institution will convert data from the sending institution, how that data will be stored and identified in the receiving institution's SIS.
 - How the addition of the sending institution's courses, majors, degrees, and other data will be properly identified in the receiving institution's SIS.
 - How the institutions involved in a merger will determine which data to convert and which data to purge.
 - Whether the receiving institution will create multiple campuses within their SIS, or house all data under a single campus.
 - Consider how the SIS segments and silos data, and make decisions that allow for maximum flexibility over time.
- How student records will be matched to avoid duplicate records for the same individual.
 - How data discrepancies will be handled (e.g., same first and last names, same social security number and date of birth, different address and phone number, conflicting race/ethnicity data).
 - How the receiving institution will handle the records of individuals who attended both institutions prior to the merger.
 - Determine which record is considered "current."
 - Whether one system is always considered the source system or system of truth, and whether this depends on the data element.
 - If activity dates are associated with the data, whether the most recent date is considered the final transaction.
- If student records are being merged into existing student information system:
 - Consider the process for claiming student ID numbers, setting up email accounts, any other login credentials required.
 - Consider creating How-To guides for primary student systems/actions (e.g., registration, degree audit, learning management system).

Recommendation

In fields where a history of prior values can be stored, or where data "types" are available, all data should be retained.

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records

Student Information Systems (SIS)

Work with the sending and receiving institutions' IT offices to establish policies for managing student data.

- Explore options for managing historical student records for the long term.
 - Take into account business requirements and use case scenarios from the registrar, financial aid, bursar, and other student support units.
 - Consider the complexity of each SIS, such as calculated values stored in database tables.
- If the prior SIS will continue to be used, several decisions are still needed:
 - Whether a system update is required, and whether future updates are feasible.
 - Consider the costs associated with upgrading the system, using the current SIS as a non-transactional database only, imaging all records digitally and storing in a Cloud database, or merging records into a different SIS. Each option presents its own financial costs and business process concerns.
- Consider conducting a long term cost analysis to address the IT infrastructure, business requirements, and the complexity of the SIS.
 - Estimates from consultants and/or vendors may be needed.
 - There may be additional technical questions surrounding work flow of processes through vendor products that need to be addressed, and new service agreements needed.

Access to the Existing System

Active students, staff and faculty involved with the merger may still need access to the former SIS. To assist students with degree planning during and after the transition, advising staff may need view access for course planning, but edit access should be restricted.

- Consider whether there will be a point in time when access to the SIS is turned off for everyone.
- If the former SIS will remain operational to process transcript requests, staff and faculty may need access for advising.
- A solution may be to provide view only access to allow staff to do their work, while also limiting the amount of staff who would have access to edit records across all campuses.

Recommendations

Before decisions are made on removing faculty/staff access, create a report of who currently has access across all institutions (include active users (a) name, (b) campus, (c) position, (role), and (d) permissions levels). This information will help gauge access by duties. The data custodian can manage access permissions after the merger, while creating a process for account requests and removals.

Internal Transfer Reporting and IPEDS Survey

IPEDS (Integrated Postsecondary Education Data System) reports are mandated by the Department of Education's National Center for Education Statistics (NCES) under common sets of definitions and standards used by all universities and colleges in the United States. Data reported within IPEDS is federally mandated for post-secondary institutions receiving federal funds. It is the responsibility of the keyholder to provide NCES with accurate data about the institution. For additional information, contact the IPEDS Help Desk at 1-877-225-2568.

National Student Loan Data System Reporting

For institutions reporting directly to the U.S. Federal Student Aid Office's National Student Loan Data System (NSLDS), refer to the latest *NSLDS Enrollment Reporting Guide* for specific information and guidelines on completing the final Enrollment Reporting Roster for closing or merging institutions.²³

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Considerations for National Student Clearinghouse Reporting

At the time of the publication of this report, the National Student Clearinghouse (NSC) will accept electronic submissions with general biographical and demographic information to help manage reporting requirements during the merger. Address enrollment reporting dates and timelines with the NSC, including degree posting, degree verify and accreditation timelines.

- When reporting changes go into effect, including name changes and OPEIDs.
- Effective dates of enrollment reporting and degree conferral.
- Effective date of when each campus closes and accreditation expires.
- Effective date of when new accreditation begins, as outlined by the accreditation application.

Be prepared for NSC coding error reports during the transition.

Recommendations

- Check Degree Verify to confirm that files were uploaded to the correct OPEID (Office of Postsecondary Education Identification) number.
- Work closely with your NSC representative to ensure timely and accurate reporting.

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APPENDIX A

State Policies Covering Disposition of Academic Records of Closed Schools

From the 2019 AACRAO *Student Records Management; Retention, Disposal, and Archive of Student Records*. To order this and other professional development resources published by AACRAO, visit <https://www.aacrao.org/research-publications/online-bookstore>.

This information is for institutions located in the United States or its territories. Institutions located outside the United States should inquire with their Ministries of Education, or the agency that accredits institutions of higher education in their countries.

Alabama. The Private School Licensure Division of the Alabama Community College System serves as the repository for student transcripts from closed licensed private postsecondary institutions. For more information, or to request a copy of a transcript from an institution that has closed, visit accs.cc/index.cfm/school-licensure/closed-school-transcript/.

Alaska. The Alaska Commission on Postsecondary Education maintains academic records for closed postsecondary institutions in Alaska. For more information, or to request a copy of a transcript from an institution that has closed, visit acpe.alaska.gov/ConsumerProtection.

Arizona. Current state law specifies that any state college or university that closes must transfer academic records to the State Department of Library Archives and Public Records, Records Management Division. For more information, visit azlibrary.gov/archives. To request a copy of a transcript from an institution that has closed, visit azed.gov/adeinfo/transcripts-and-student-records/.

Arkansas. The accrediting agency in the Department of Higher Education assumes responsibility for relocating records. For more information visit adhe.edu. To request a copy of a transcript from an institution that has closed, visit adhe.edu/private-career-education/request-a-transcript-from-a-closed-school.

California. The California Department of Education mandates that in the event of a school closure, the school is obligated to provide a custodian of records. For more information, or to request a copy of a transcript from an institution that has closed, visit cde.ca.gov/re/di/st/.

Colorado. The Colorado Department of Higher Education is the statutory repository for student records after an authorized institution or private occupational school closes. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit highered.colorado.gov/academics/transcripts/transcript.html.

Connecticut. The Office of Higher Education maintains student academic transcripts

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from many colleges, universities, and private occupational schools which are now closed. For more information, or to request a copy of a transcript from an institution that has closed, visit ctohe.org/Students-Families/StudentTranscripts.shtml.

Delaware. By statute, records are stored at a central location: Delaware Higher Education Office. For information about closed school records, or to request a copy of a transcript from an institution that has closed visit www.doe.k12.de.us/domain/226.

District of Columbia. The Higher Education Licensure Commission is the repository for academic records of postsecondary institutions that go out of business and make no other arrangements for maintaining the records. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit osse.dc.gov/service/closed-postsecondary-school-transcripts.

Florida. The Commission for Independent Education maintains records for some independent postsecondary educational institutions that have closed. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit web02.fldoe.org/CIE/Transcript/TranscriptRequest.aspx.

Georgia. Records of public institutions are stored at a central location: Board of Regents of the University System of Georgia. For information about closed public school records, visit usg.edu/regents.

Hawaii. A closed school is supposed to transmit its records to the Hawaii Post-Second-

ary Education Authorization program. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit cca.hawaii.gov/hpeap/.

Idaho. The Idaho State Department of Education supports schools and students. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit sde.idaho.gov.

Illinois. The Illinois Board of Higher Education (IBHE) has records from schools that have formally notified the IBHE of their closure. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit ibhe.org/dgclosed.html.

Indiana. The Indiana State Archives maintains academic transcripts for defunct institutions that were formerly regulated by the Indiana Commission on Proprietary Education. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit in.gov/bpe/2335.htm.

Iowa. Records are stored at a central location: The University of Iowa Registrar's Office. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit registrar.uiowa.edu/contact.

Kansas. The Kansas Board of Regents will provide copies of transcripts to students from closed private postsecondary schools upon request. For information about closed school records, or to request a copy of a transcript from an institution that has

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closed visit, kansasregents.org/academic_affairs/private_out_of_state/obtaining_a_transcript.

Kentucky. The Kentucky Council on Post-secondary Education keeps a list of closed institutions and contact information regarding records. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit cpe.ky.gov/campuses/closed.html.

Louisiana. When a proprietary school closes, the school is required to transfer the student records to the Board of Regents. For information about closed school records, visit regents.la.gov/about/proprietary-schools/.

Maine. When a Maine post-secondary school or college ceases operation, the Maine Department of Education seeks to acquire and preserve the academic records. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit maine.gov/doe/learning/highered/transcripts.

Maryland. Records are stored at a central location: Maryland Higher Education Commission. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit mhec.maryland.gov/institutions_training/Pages/career/pcs/closures.aspx.

Massachusetts. A central directory of closed institutions is maintained by the Massachusetts Department of Higher Education. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit mass.edu/forstufam/diplomas/closedinst.asp.

Michigan. The Michigan Association of Collegiate Registrars and Admissions officers maintains a list of the locations of academic records from closed institutions. For information about closed school records, visit macrao.org/Archives/ClosedColleges.asp.

Minnesota. The Minnesota Office of Higher Education provides a list of the location of academic records for most closed institutions. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit ohc.state.mn.us/sPages/closedSchoolContact.cfm.

Mississippi. Neither the Mississippi Commission on College Accreditation (MCCA) nor Institutions of Higher Learning store student records for closed schools, however, MCCA may be able to provide contact information. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit mississippi.edu/mcca/.

Missouri. The Proprietary School Certification Program serves as a clearinghouse for information about closed Missouri post-secondary schools. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit dhe.mo.gov/psc/closedschool.php.

Montana. Inquiries about closed schools can be made by contacting the Office of the Commissioner of Higher Education. For more information about closed school records, visit mus.edu/che/.

Nebraska. The Nebraska Department of Education keeps the student records for most of the closed private postsecondary ca-

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reer schools in Nebraska. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit education.ne.gov/PPCS/Transcripts/.

Nevada. Records are stored in a central location: Nevada Commission on Postsecondary Education. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit cpe.nv.gov/Transcript/Transcripts/.

New Hampshire. Records are stored in a central location: New Hampshire Department of Education. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit education.nh.gov/highered/closed/.

New Jersey. The Office of the Secretary of Higher Education provides a list of the location of academic records of closed and renamed institutions. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit nj.gov/highereducation/colleges/closed_renamed.shtml.

New Mexico. The New Mexico Department of Education maintains a list of closed institutions. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit hed.state.nm.us/institutions/transcript.aspx.

New York. The New York Department of Education maintains a list of closed, merged, and renamed institutions. For information about closed school records, or to request a copy of a transcript from an institution that

has closed, visit highered.nysed.gov/ocue/spr/closedInstDirectory.htm.

North Carolina. The State Archives of North Carolina has custody of the student academic records of a number of defunct post-secondary schools and colleges in North Carolina. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit archives.ncdcr.gov/researchers/services/academic-transcripts-defunct-colleges.

North Dakota. The North Dakota University System is governed by the State Board of Higher Education. For more information about records from closed schools, visit ndus.nodak.edu/system/.

Ohio. The State Board of Career Colleges and Schools provides a list of the location of academic records of closed institutions. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit scr.ohio.gov/ConsumerInformation/Student-Transcripts/tabid/69/Default.aspx.

Oklahoma. State public colleges and universities are responsible for maintaining official student academic records. The office of the Oklahoma State Regents for Higher Education does not maintain any student records. However they do provide information about where to find closed school records, or where to request a copy of a transcript from an institution that has closed. For more information visit okhighered.org/current-college-students/transcripts.shtml.

Oregon. The Higher Education Coordinating Commission Office of Academic Policy

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and Authorization provides a supporting role when authorized schools close, including transcripts and other services. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit oregon.gov/highered/institutions-programs/private/Pages/private-postsecondary-school-closure-transcripts.aspx.

Pennsylvania. The Pennsylvania Department of Education oversees colleges, universities and seminaries. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit education.pa.gov/Postsecondary-Adult/College%20and%20Career%20Education/Pages/College-and-Universities.aspx.

Rhode Island. The Office of the Postsecondary Commissioner maintains a list of postsecondary institutions that are no longer operating in the state. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit riopc.edu/page/records/.

South Carolina. The South Carolina Commission on Higher Education maintains a list of postsecondary institutions that are no longer operating in the state. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit che.sc.gov/InstitutionsEducators/Licensing/LicensingofNon-PublicPostsecondaryInstitutions.aspx.

South Dakota. The South Dakota Board of Regents governs the system of public higher education in the state of South Da-

kota. For information about closed school records, visit sdbor.edu.

Tennessee. The Division of Postsecondary State Authorization maintains student transcripts from previously authorized institutions that have closed. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit tn.gov/thec/bureaus/student-aid-and-compliance/postsecondary-state-authorization/academic-transcripts.html.

Texas. The Texas Higher Education Coordinating Board serves as the central hub for information related to student academic records from Texas private institutions that have closed. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit thecb.state.tx.us.

Utah. The Utah State Board of Regents governs the system of public higher education in the state of Utah. For information about closed school records, visit higheredutah.org.

Vermont. The Office of the Secretary of State maintains records from closed postsecondary schools whose records are in the Vermont State Archives. For information about closed school records, visit sec.state.vt.us/archives-records/certifications-fees/student-transcripts.aspx.

Virginia. The State Council of Higher Education for Virginia provides a list of the location of academic records of closed institutions. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit schev.edu/index/students-and-

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parents/explore/virginia-institutions/closed-institutions-(all).

Washington. The Workforce Training & Education Coordinating Board is responsible for administering consumer protection provisions on behalf of students enrolled in schools which may have closed or will soon close. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit wtb.wa.gov/PCS_ClosedSchools.asp. The Washington Student Achievement Council also maintains student transcripts for some schools that have ceased to operate in Washington State. For more information about those institutions visit wsac.wa.gov/protecting-education-consumers.

West Virginia. The West Virginia Higher Education Commission oversees the state's four-year colleges and universities. For in-

formation about closed school records, or to request a copy of a transcript from an institution that has closed, visit wvhepc.edu/resources/information-about-closed-institutions/.

Wisconsin. The Educational Approval Program (EAP) maintains a list of schools that have operated in the state of Wisconsin but have closed, including schools that were not subject to EAP oversight. For information about closed school records, or to request a copy of a transcript from an institution that has closed, visit dsps.wi.gov/pages/programs/educationalapproval/student.aspx.

Wyoming. No closings are reported at this time, however, policies for private schools would require the parent institution to retain records. For more information, visit wyo.gov/education.

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APPENDIX B

State Records Management Resources/Retention Schedules

From the 2019 AACRAO *Student Records Management; Retention, Disposal, and Archive of Student Records*. To order this and other professional development resources published by AACRAO, visit <https://www.aacrao.org/research-publications/online-bookstore>.

This information is for institutions located in the United States or its territories. Institutions located outside the United States should inquire with their Ministries of Education, or the agency that accredits institutions of higher education in their countries.

State	Dept	URL
Alabama	Department of Archives and History, State Records Center (ADAH)	archives.alabama.gov/officials/rec-center.html
Alaska	State Archives	archives.alaska.gov/rims/
Arizona	State Library, Archives, and Public Records—Records Management Division	azlibrary.gov/records
Arkansas	Department of Finance and Administration	dfa.arkansas.gov/intergovernmental-services/records-retention-schedule
California	Department of Education	dgs.ca.gov/osp/Programs/StateRecordsCenter
Colorado	State Archives—Records Management Services	colorado.gov/pacific/archives/RecordsManagement
Connecticut	State Library—Office of the Public Records Administrator (OPRA)	ctstatelibrary.org/publicrecords/general-schedules-state
Delaware	Public Archives	archives.delaware.gov/aboutagency.shtml
Florida	Department of State—Division of Library and Information Services	dos.myflorida.com/library-archives/records-management/general-records-schedules/
Georgia	University System of Georgia, Records Management and Archives	usg.edu/records_management/
Hawaii	State Records Center	ags.hawaii.gov/archives/
Idaho	Idaho State Historical Society	history.idaho.gov/records-center/idaho-records-center-retention-schedules/
Illinois	State Archives	cyberdriveillinois.com/departments/archives/
Indiana	Archives and Records Administration	in.gov/iara/3262.htm
Iowa	State Records Commission	iowaculture.gov/history/research/state-government-records-management/state-records-manual-and-schedule
Kansas	State Historical Society—Records Management	kshs.org/p/state-records-management-manual-best-practices/11365
Kentucky	Department for Libraries and Archives	kdla.ky.gov/records/retentionschedules/Pages/default.aspx
Louisiana	State Records Center	sos.la.gov/HistoricalResources/ManagingRecords

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State	Dept	URL
Maine	State Archives - State Agency Records	maine.gov/sos/arc/records/state/policy.html
Maryland	State Archives	msa.maryland.gov/msa/intromsa/html/record_mgmt/welcome.html
Massachusetts	State Records Center	sec.state.ma.us/rec/recabt/abtidx.htm
Michigan	Records Management Services	michigan.gov/recordsmanagement/
Minnesota	State Archives	mnhs.org/preserve/records/gov_services.htm
Mississippi	Department of Archives and History (MDAH)—State Government Records Office	mdah.ms.gov/new/government-2/records-management/local-government-records/record-retention-schedules/
Missouri	Secretary of State Records Management	sos.mo.gov/records/recmgmt/
Montana	Secretary of State Records and Information Management Division	sosmt.gov/records/toolkit/rim-retention/
Nebraska	Secretary of State Records Management Division	www.sos.ne.gov/records-management/retention_schedules.html
Nevada	State Library and Archives Records Management Division	nsla.libguides.com/state-records-services/retention-schedules
New Hampshire	Archives and Records Management	sos.nh.gov/arch_rec_mgmt.aspx
New Jersey	Division of Archives and Records Management	nj.gov/treasury/revenue/rms/retention.shtml
New Mexico	Commission of Public Records—State Records Center and Archives	nmcpr.state.nm.us/records-management/agency-analysis-bureau/
New York	State Archives and Records Administration	archives.nysed.gov/records/retention-scheduling-and-appraisal
North Carolina	State Archives	archives.ncdcr.gov/government/retention-schedules/university-schedules
North Dakota	Information Technology Department Records Management	nd.gov/itd/services/records-management
Ohio	State Archives Local Government Records Program	ohiohistory.org/learn/archives-library/state-archives/local-government-records-program
Oklahoma	Department of Libraries, Records Management Division	libraries.ok.gov/state-employees/records-management/records-scheduling/
Oregon	State Archives	sos.oregon.gov/archives/Pages/records_retention_schedule.aspx
Pennsylvania	Office of Administration Records Management	oa.pa.gov/Programs/Records-Mgmt/Pages/default.aspx
Rhode Island	Public Records Administration	sos.ri.gov/divisions/frequent-filers/records-management
South Carolina	Archives and Records Management	scdah.sc.gov/records-management/
South Dakota	Bureau of Administration	boa.sd.gov/central-services/records-management-schedules.aspx

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State	Dept	URL
Tennessee	Secretary of State, Records Management Division	sos.tn.gov/rmd-resources
Texas	State Library and Archives Commission	tsl.state.tx.us/slrn/recordspubs/rrs3.html
Utah	Division of Archives and Records Service	archives.utah.gov/recordsmanagement/
Vermont	Secretary of State Archives and Records Administration	sec.state.vt.us/archives-records/records-management/records-retention.aspx
Virginia	Library of Virginia Records Management	lva.virginia.gov/agencies/records/
Washington	State Archives Records Retention	sos.wa.gov/archives/RecordsManagement/
West Virginia	Office of Technology Records Management	technology.wv.gov/about-wvot/it-community/Pages/WVRecordsManagementProcedures.aspx
Wisconsin	Public Records Board	publicrecordsboard.wi.gov/
Wyoming	Wyoming State Archives Records Management	wyoarchives.state.wy.us/index.php/records-management-services
Washington, D.C.	District of Columbia Records Center	os.dc.gov/service/public-records-center

For additional information concerning state archive practices, please consult the Council of State Archivists (CoSA).¹ The Council of State Archivists is a national organization comprising the individuals who serve as directors of the principal archival agencies in each state and territorial govern-

ment. Under regulations of the National Historical Publications and Records Commission, these individuals also serve as the state historical records coordinators who chair their respective State Historical Records Advisory Boards.

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APPENDIX C



Merging Institutions Record Retention Worksheet

Adapted from the 2019 AACRAO *Student Records Management; Retention, Disposal, and Archive of Student Records*.

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Table 1: ADMISSIONS RECORDS FOR APPLICANTS WHO DO NOT ENROLL				
Admission Documents				
Admission letters	Notices of admission, waitlist and denial			
Correspondence, relevant				
Waivers of rights of access (admissions)	Waiving right of access to admission letters of recommendation			
Application Materials				
Applications for admission or re-admission	Admission application such as undergraduate, graduate, international, or non-degree/special admittance			
Credit by examination	Reports/scores on Advanced Placement, CLEP, etc.			
Entrance examination reports/test scores	Standardized test scores, such as ACT/SAT, LSAT, MCAT, GRE, TOEFL			
Medical records	e.g. , immunization records			
Letters of recommendation (admissions)				
Military documents				
Placement test records/scores				
Residency classification forms				
Test scores (other)				
Transcripts (high school)				
Transcripts (other colleges)				
International Student Documents				
Alien Registration Receipt Card	Evidence of admissibility as a permanent resident			
DS-2019	Certificate of eligibility for J1 visa status (formerly IAP-66)			

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Employment Authorization (work permit), if granted				
I20	Certificate of eligibility for F-1 visa status			
I94 Card (copy)	Document issued to nonimmigrants; also known as Arrival Departure Record			
Passport number				
Statement of Educational Costs	Estimate of total school year costs			
Statement of Financial Responsibility	Evidence of adequate financial resources			
Table 2: ADMISSIONS RECORDS FOR APPLICANTS WHO ENROLL				
Admission Documents				
Admission letters†	Notices of admission, denial, or waitlist			
Admission letters (Special Program)				
Correspondence, relevant				
Waivers of rights of access (admissions)	Waiving right of access to admission letters of recommendation			
Application Materials				
Applications for admission or re-admission	Admission application such as undergraduate, graduate, international, or non-degree/ special admittance			
Credit by examination	Reports/scores on Advanced Placement, CLEP, etc.			
Entrance examination reports/test scores	Standardized test scores, such as ACT/SAT, LSAT, MCAT, GRE, TOEFL			
Medical records	e.g. , immunization records			
Letters of recommendation (admissions)				
Military documents				

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Placement test scores/reports				
Release from high school or Dual Enrollment forms				
Residency classification forms				
Test scores (other)				
Transcripts (high school)				
Transcripts (other colleges)				
International Student Documents				
Alien Registration Receipt Card	Evidence of admissibility as a permanent resident			
DS-2019	Certificate of eligibility for J1 visa status (formerly IAP-66)			
Employment Authorization (work permit), if granted				
I-20	Certificate of eligibility for F-1 visa status			
I94 Card (copy)	Document issued to nonimmigrants; also known as Arrival Departure Record			
Passport number				
Statement of Educational Costs	Estimate of total school year costs			
Statement of Financial Responsibility	Evidence of adequate financial resources			
Table 3: Student Academic Records				
Academic Program Records				
Academic advisement records				
Academic warning	Notice of academic action related to academic non-performance/deficiency			

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Academic suspension	Notice of academic action related to academic non-performance/deficiency			
Academic dismissal	Notice of academic action related to academic non-performance/deficiency			
Academic integrity code violations (with sanctions)	Notice of violation of academic integrity policies including sanctions, if any			
Academic Records (miscellaneous)	Narrative evaluations, competency assessments, etc.			
Correspondence (student)	Related to academic records, inquiries			
Disciplinary action records	Grade or program actions, notice of sanctions related to personal conduct			
Grievance/complaint (by student)	Various course/exam related issues, not grade or FERPA disputes (see grade appeal/complaint or Table 5)			
Leave of absence				
Major changes, certification of 2nd majors, minors				
Petitions (academic)	Exceptions to academic rules			
Thesis/Dissertation				
Transcripts	Permanent academic record			
Certification/Verification Records				
Athlete eligibility reports				
Athlete records	Initial and continuing eligibility information, academic information, documentation of participation, tutor evaluation and assessment			
Enrollment verifications	Verifications of enrollment, graduation, GPA, and other related academics			
Residency verification records	Documents in support of verifying residency in state for tuition purposes			
Teacher certifications				

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Transcript requests (student)	Official transcript requests by student			
VA certification records	Certifying documents for federal VA benefits			
Degree and Certificate Records				
Application for degree or other credential	Degree application, record of degree name, etc.			
Degree audit records	Degree audits in support of graduation clearing			
Graduation lists	Lists of graduates for graduating class			
Substitution/waivers	Approvals to meet program requirements with administrative action			
Grade and Scholarship/Deficiency Records				
Exams (final)/graded coursework				
Grade appeal/complaint	Student final grade disputes			
Grade book (faculty)	Record of students in course and work completed			
Grade change forms	Record of authorization to change grade			
Grade reports (midterm)	Record of midterm grades submitted by faculty			
Grade submission sheets/data	Original record of grades submitted at end of term			
Miscellaneous Records				
Name change authorizations				
Personal data information forms	Change of address, race/ ethnicity questionnaires, and other demographic data			
Transfer credit evaluations				
Registration and Enrollment Records				
Class schedules (students)	Student schedules for each term			

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Class lists	Record of class rosters for each term			
Course repeat form/approval				
Credit/no credit, audit, or pass/no pass approvals	Authorizations for various enrollment options			
Enrollment changes	Record of student add/drop/ withdraw from class			
Hold or encumbrance authorizations	Registration and transcript holds			
Registration/ enrollment records	Initial registration forms, current enrollment records			
Withdrawal/cancellation of enrollment records	Record of request to withdraw from all classes			
Table 4: Student Record Electronic Data				
Data change logs	Electronic log of changes to enrollment and other data, including date/time stamp information and user that changed data if that data is maintained separately in system			
Email data/information	Emails and other electronic communications that authorize academic/enrollment actions and/or provide directory/ non directory information about a student			
Enrollment data	Electronic record of enrollment in classes, including records of drop, add and enrollment change activity			
Grade data	Electronic record of submitted grades and grade changes, including date/ time stamp and user data			
Student demographic information	Electronic student data including student characteristics, date of birth, former names, address information, photo ID and ethnic information, etc.			
Table 5: Publications, Statistical Data, and Institutional Reports				
Catalogs	Published annually or bi-annually, record of courses, degrees, and programs of study offered			
Commencement programs	Published record of graduates for public distribution			
Degree statistics	Record of degrees granted by institution per graduation term and/or annually			
Enrollment statistics	Per term report of enrolled students, e.g., by class, by course, totals, headcount, and FTE			

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Grade distribution and other grade statistics	Report of grades given, including summary grade point statistics by class			
Instructor evaluations (by students)	1 semester or UANS			
Race/ethnicity reporting	Report of student enrollment, graduation, and other metrics by race and ethnic origin			
Table 6: Family Educational Rights and Privacy Act (FERPA) Records				
Requests for formal hearings	Student-initiated request for formal hearing regarding amendment of education record			
Requests for and disclosures of personally identifiable information	Necessary for compliance with recordkeeping requirements in FERPA			
Requests for nondisclosure of directory information	Student request to opt-out of directory information disclosure			
Statements on content of records regarding hearing panel decisions	If student request for amendment of record is not granted, then student statement must be maintained in the record, and disclosed whenever the record is disclosed.			
Written consent for records disclosure	Student signed (electronic or paper) authorization for disclosure of education record			
Waivers for rights of access	Covers confidential letters and statements of recommendations related to the student's admission; application for employment; or receipt of an honor or honorary recognition (section 99.12(b)(3))			
Written decisions of hearing panels	Decisions resulting from formal hearings regarding amendment of education records			
Table 7: Federal Disclosure Records				
Athletic Participation/ EADA documents				
College Costs, accreditation, textbook information, transfer credit policy	Complies with the Higher Education Opportunity Act			
Crime Statistics/Security Reports	Complies with Clery Act reporting requirements			
Graduation/completion, Transfer-out Data	Complies with Student Right-to-Know legislation			
Institutional information (Cost of attendance, withdrawal procedures, accreditation, etc.)				
Table 8: Federal Student Financial Aid (SFA) Record Retention Requirements				
SFA Program Records				

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Accrediting and licensing agency review, approvals, and reports	Audit reports and school responses			
Records pertaining to financial responsibility and standards of administrative capability	Program Participation Agreement			
Self-evaluation reports	State agency reports			
SFAFiscal Records				
Bank statements for accounts containing SFA funds	Federal work-study payroll records			
Ledgers identifying SFA transactions	Records of SFA program transactions			
Records of student accounts	Records supporting data on required reports (SFA program reconciliation reports, audit reports and school responses, Pell Grant statements of accounts, accrediting and licensing agency reports)			
SFARecipient Records				
Application data submitted to the Dept. of Education or lender by the school on behalf of the student	Data used to establish student's admission, enrollment status, and period of enrollment			
Date and amount of disbursements	Documentation of student's eligibility			
Documentation of student's satisfactory academic progress				

Record Series Title	Description	Sending Institution Retention Period	Receiving Institution Retention Period	Planning Notes for Merger
Documentation of student's program of study and enrolled courses				
	Documentation related to the receipt of aid, such as the amount of grant, loan, or FWS award, and calculations used to determine aid amounts			
	Documentation of initial or exit loan counseling			
	Documentation supporting the school's calculation of its completion/graduation or transfer-out rate			
	Documents used to verify applicant's data			
	Financial aid history for transfer students			
	Reports and forms used for participation in the SFA program			
	Student Aid Report (SAR) or Institutional Student Information Record (ISIR)			
	Requirements for Specific Aid			
	Borrowers eligibility records			
	Campus-based aid (Perkins loan, SEOG, and Federal Work Study)			
	FFEL and Direct Loans			
	Fiscal Operations Report and Application to Participate (FISAP)			
	Pell Grant			
	Perkins repayment records			
	Perkins original promissory notes			
	All other records/reports			

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ADDITIONAL RESOURCES

Council for the Advancement of Standards in Higher Education (CAS) Standards

Recommended Policy for State Higher Education Executive Officers (SHEEO) Agencies - Response to Institutions Closing or in Danger of Closing

Closed or Merged Schools Guidance to Manage Services with National Student Clearinghouse

Parchment Registrar Services & Indexing Guidelines

[Federal Student Aid Has Your School Closed? Here's What to Do.](#)

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Registrar Services (RS) at an institution facing potential closure or termination of academic programs must be aware of how to handle records, including transcripts and replacement diplomas. The RS must relocate student records, especially official transcripts, to a proper location that can be accessed by former students. RS must notify current and former students.

RS's plans and processes for managing the closure or termination should include formal notification and partnership with appropriate accrediting bodies, governmental agencies such as state higher education agencies, secretary of state, state archivist, the federal department of education, and other institutions of higher education. RS should identify and comply with laws pertaining to the handling and storage of student records.

RS should coordinate with registrar services at institutions with appointed authorities to accept affected students within a year of graduation. RS should assist affected students with the transfer of their records to other institutions to complete their academic programs.

RS at an institution with authority to serve as a data custodian for records from an institution ceasing to operate must provide a separate and clear process and structure for the storage, security, preservation, and accessibility of the documents for former students.

The RS's document handling processes and structures should:

- preserve the original institution name, student name, and academic records associated with the student without modification
- add to each document a statement to reflect the role of the data custodian institution and its limitations of service
- provide information about data custodianship through a web presence to ensure former students can access and request their records if the notification to them failed
- address storage of backup documents, including the use of safety paper.

Records relocated from an institution that has ceased operating should not contain information about the institution serving as data custodian.

RS at institutions with authority to serve as data custodian must be able to manage, transmit and verify records from institutions that have ceased operating.

RS should oversee this process in accordance with current laws and with standards provided by organizations such as the American Association of Collegiate Registrars and Admissions Officers and accrediting bodies.

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records



Recommended Policy for State Higher Education Executive Officers (SHEEO) Agencies - Response to Institutions Closing or in Danger of Closing

When Transcripts, Graduation Lists, and College Catalogs Should Be Obtained

1. The state authorizing agency shall ensure the preservation and accessibility of transcripts and other academic records as soon as possible after:
 - a. An institution has announced that it is closing; or
 - b. An institution is deemed by the state authorizing agency to be in danger of closing.

What Transcripts, Graduation Lists, and College Catalogs Should Be Obtained

2. For any institution that is closing or in danger of closing, the state authorizing agency, working as appropriate with the state attorney general's office, the state archives, or other state repository, shall ensure the preservation of the following records in a digitized, accessible, indexed, searchable, and readily convertible, portable format:
 - a. Transcripts for students who are currently attending the institution or have attended the institution for at least the last 50 years;
 - b. Graduation lists or other comparable academic documentation for all students who have graduated within the last 50 years; and
 - c. College catalogs over the past 50 years.

Retention and Servicing of Transcripts, Graduation Lists, and College Catalogs

3. A state agency shall be designated to serve as, or shall select or approve a designee to serve as, the repository of all transcripts and other academic records of closed or closing institutions, and the agency so designated shall:
 - a. Retain such records for a minimum of 50 years; and
 - b. Establish a mechanism to service requests for transcripts and verification of graduation from students and alumni at minimal cost, utilizing, if necessary and possible, the assets of the closed or closing institution to digitize any essential academic records currently in a non-digital form.

If the agency is not the repository, but instead has designated or approved a repository, the agency shall make reasonable efforts to ensure the repository's compliance with the retention and servicing requirements set forth above.

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records



National Student
Clearinghouse®

Closed or Merged Schools Guidance to Manage Services with National Student Clearinghouse

Enrollment and Degree Reporting

- Before closing the OPEID at NSLDS contact Clearinghouse to arrange a schedule for reporting the final enrollment files. Contact schoolops@studentclearinghouse.org as soon as possible to review the plan.
- The school determined to be the 'system of record' or Custodian will be named and all future requests for degree verifications and transcript requests will be handled by that school. Clear messaging on the closed school's website should clearly state who is handling these processes.
- Guidance from NSLDS on enrollment reporting
 - 5.2.2.1 For Schools That Are Closing Steps to complete the final enrollment reporting roster if your school is closing:
 - The school (or school's servicer) must update their roster one final time. All students need to be updated to the appropriate non-active enrollment status, such as 'G', 'W', 'X', or 'Z'. If the status is based on the date the school closed, the enrollment status effective date will be the date the school closed. NSLDS Enrollment Reporting Guide Chapter 5 November 2018 42 A) 'G' (graduated): Provide the status effective date of the student's graduation. B) 'W' (withdrawn): The status effective date should match the date the student withdrew or the effective date of school's closure. C) 'X' (never attended): The status effective date should match the date the student was first reported on the roster. D) 'Z' (no record found): The status effective date should match the date the student was first reported on the roster.
 - Once all updates and any resulting errors have been completed, the school should contact its PDPA to terminate all online and batch access for the Enrollment Reporting Process.
- Determine when the final degree awards will be completed. Inform Clearinghouse of this date so Clearinghouse can continue to offer degree verification service, if needed, for a limited period of time. If the school is aware of the Custodian, they should inform us so Clearinghouse can update our database so the Custodian can access the data.
- Determine what school will be handling the degree pending requests. The closing school needs to clean up all pending requests prior to closure and then going forward the Custodian would handle the requests.

Transcript services

- If the closed/merged school is using Clearinghouse for transcript ordering and delivery, let us know which institution (system of record) will be housing the transcript documents.
- If the system of record school is using Clearinghouse, let us know how you want to handle the transcript process for those records.
- School needs to document this information or instructions online for as long as feasible.

StudentTracker

Closed or Merged Institutions: Guidance and Best Practices Pertaining to Student Education Records

- Once the school is closed or merged, all StudentTracker data requests must come from the system of record schools. Clearinghouse is unable to process under the closed school records.

For guidance or providing announcements of mergers or closures, contact the regional director at the National Student Clearinghouse.²⁴



Parchment Registrar Services & Indexing Guidelines

If the custodian is unable to provide the records with the required naming convention, a machine readable PDF and roster may qualify for processing. The record must be machine readable, scans of physical records will not be accepted without indexing. This scenario will require additional review. The roster format has been provided below with an example entry.

Required Roster
Format

Filename

First Name

Middle Name

Last name

DOB Student ID (4) Digit SSN Grad Year

Sample: John Queue Sample 01/01/1958 A34987 7684 1976

SamanthaS.pdf Samantha NULL SAMPLE 01/03/1968 Z85423 9899 1986

Diploma & Certificate Requirements

PDF of Diplomas or Certificate must be in the Parchment preferred naming convention:

FirstName_MiddleName_LastName_Date-Of-Birth_StudentId_Last4SSN_GradYear.pdf

If fully rendered PDFs of the credential are not available, the custodian must provide the artwork, seals/logos, signatures,

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and a diploma roster file that includes:

- First Name
- Middle Name
- Last Name
- Name Suffix
- Date of Birth
- Unique ID
- Last 4 SSN
- Award Date
- Award Title
- Earner Display Name
- Honors Earned
- Major

Note: If File Format Requirements for standard Registrar Services cannot be met, then Parchment's Scan & Index Services may be engaged. The professional service is available to digitize, divide, data capture, and rename physical or digital records. For Registrar Services fulfillment, the credentials (whether digital or paper) must provide sufficient data for one-to-one matching to the Student Roster and/or FERPA compliant matching to the learner request.

**Closed or Merged Institutions:
Guidance and Best Practices Pertaining to Student Education Records**

Endnotes

1 Vasquez, M. and Bauman, D. April 4, 2019. How America's College-Closure Crisis Leaves Families Devastated. The Chronicle of Higher Education. Retrieved from <https://www.chronicle.com/interactives/20190404-ForProfit>

2 Ibid.

3 Monaghan, P. December 15, 2019. The Best Time to Merge: Before 'No One Wants You.' The Chronicle of Higher Education. Retrieved from <https://www.chronicle.com/article/The-Best-Time-to-Merge-Before/247714>

4 Monaghan, P. December 15, 2019. The Best Time to Merge: Before 'No One Wants You.' The Chronicle of Higher Education. Retrieved from <https://www.chronicle.com/article/The-Best-Time-to-Merge-Before/247714>

5 Woodhouse, K. September 16, 2015. Another New Name. Inside Higher Ed. Retrieved from <https://www.insidehighered.com/news/2015/09/16/georgia-regents-university-undergoes-name-change-again>

6 See 34 C.F.R. 99.3.

7 See 34 C.F.R. 99.31.

8 American Association of Collegiate Registrars and Admissions Officers. 2019. Student Records Management: Retention, Disposal, and Archive of Student Records. Pg. 36.

9 See <https://ifap.ed.gov/electronic-announcements/110519RevisionGuidelinesApplicableStandardTerms>.

10 See 34 C.F.R. 668.14(b)(31). For additional information, see the U.S. Department of Education's webinars on new accreditation regulations at <https://ifap.ed.gov/dear-colleague-letters/ANN2003>.

11 Congressional Research Service. February 5, 2019. The Closure of Institutions of Higher Education: Student Options, Borrower Relief, and Other Implications. Retrieved from <https://fas.org/sgp/crs/misc/R44737.pdf>. See, for example, Higher Learning Commission, "Commission Approval of Institutional Teach-Out Arrangements," <https://www.hlcommission.org/Policies/teach-out-arrangements.html>; and Southern Association of Colleges and Schools, Commission on Colleges, "Substantive Change For SACSCOC Accredited Institutions," Retrieved from <http://www.sacscoc.org/pdf/081705/SubstantiveChange.pdf>.

12 Documentation may be captured in the degree audit system, if one exists. However, documentation may also exist electronically or physically in student files maintained in academic departments, dean/advising offices, centralized academic advising units, or the Registrar's Office. Be diligent in efforts to secure such documentation.

13 See 34 C.F.R. 600.2.

14 See 34 C.F.R. 99.3(a)(4).

15 See https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/elr.asp.

16 See <https://www.va.gov/statedva.htm>.

17 For more information, visit: <https://www.va.gov/school-administrators/>.

18 Webinar 1: <https://www.nacubo.org/Events/2020/Pre-Merger-Process-Lessons-Learned>

19 Webinar 2: <https://www.nacubo.org/Events/2018/Leadership-Lessons-from-the-Merger-Front>

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20 Webinar 3: <https://www.nacubo.org/Conferences-and-Workshops/NACUBO-Podcasts/NACUBO-In-Brief/2020/Episode-49-Merging-Two-Colleges>

21 American Association of Collegiate Registrars and Admissions Officers Work Group. July 12, 2019. Student Identity. Retrieved from <https://www.aacrao.org/docs/default-source/signature-initiative-docs/trending-topic-docs/gender/student-identity-report06062019.pdf>.

22 American Association of Collegiate Registrars and Admissions Officers. 2019. Student Records Management: Retention, Disposal, and Archive of Student Records. Pg. 21-22.

23 U.S. Department of Education's Federal Student Aid Office. November 2019. NSLDS Enrollment Reporting Guide. Pg. 40-41. Retrieved from: https://ifap.ed.gov/sites/default/files/attachments/2019-12/NewNSLDSEnrollmentReportingGuide_0.pdf.

24 See <https://www.studentclearinghouse.org/reps/>.