

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 18,000 higher education professionals representing approximately 2,300 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 and decreasing budgets will continue to result in a growing number of students left with incomplete educations and many questions about their academic plans and personal finances. As institutions close, students are displaced.

In addition, 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.

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 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. In 2024, a review group was charged to review and revise the guidelines.

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>.

GLOSSARY OF TERMS

Below are general definitions for terms related to closed and merged institutions. Refer to US Department of Education definitions. Also refer to applicable state and accreditation guidelines. For example, the Teach-out Toolkit from the Higher Learning Commission can be a valuable resource.

https://download.hlcommission.org/initiatives/TeachOutToolkit_2020_RSC.pdf

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 which 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 two institutions, sending and receiving institutions (as defined below) combining.

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 or the institution that is closing and sending its records to an institution/entity to serve as the data custodian.

Student Academic Record

Those records for an enrolled individual maintained by an institution, such as transcripts, term-based enrollment statuses, and biographical/demographical data

Teach-Out Plan

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

Teach-Out Agreement

The agreement by which an institution of higher education partners with a closing/closed institution to fulfill the educational and contractual obligations to students who had been enrolled in the closing/closed institution.

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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. 27), see also Appendix B, "State Records Management Resources/Retention Schedules (on p. 33)."

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 receiving institution/entity, 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 student 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. 27). For additional information regarding this issue, see Appendix B, “State Records Management Resources/Retention Schedules (on p. 33).”

The state-designated receiving institution/entity should be aware that, once an institution school has closed and the student 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.

Considerations for Closing Institutions

- How transparency and clear communication will be maintained throughout the process.
- 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.

Recommendations for Closing Institutions

To ensure a smooth transfer of the management of student records, it is suggested that the closing institution follow the steps below. These recommendations pertain 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.

- Identify a contact at the receiving institution responsible for ensuring the effective and secure transfer of these records.
- Determine an effective date for the transfer of records. Following the effective date, all requests for records access should be directed to the receiving institution/entity.
- Ensure that the effective date is communicated to all current and former students.
- Notify all current and former students that their records will be accessible by contacting the identified entity/receiving institution/entity. The closing institution should notify the current students using free methods of communication (email, school newspaper, institution strategic communication office, etc).
- Create a website (to remain after the closure) with key information, including access information for transcripts, degree verifications, catalogs, etc.
- Notify current and former students of the deadline for requests to make changes to records, in advance of the records transfer.
- 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/entity.
- Follow the closing institution’s records and retention policies to appropriately destroy records that do not need to be transferred to the receiving institution/entity.
- Provide records electronically, or in the original file format (e.g. microfiche or hard copy, 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.

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- Contact the appropriate accrediting agency to ensure all regulations and guidelines are being followed in the transfer of the records.
- Provide a courtesy copy of transcripts to all students
- Provide a courtesy copy of all international transcripts to students with such transcripts in their records. Provide documentation (plus templates and other materials, as appropriate) for replacement diplomas to be provided by the receiving institution.

RECEIVING INSTITUTIONS: GUIDANCE AND BEST PRACTICES FOR 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 Custodian Recommendations for Receiving Institutions

- 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/entity should be appraised and categorized upon receipt in a manner that is consistent with the record management program of the receiving institution/entity.
 - If the inventory reveals a new record type, or series, the retention schedule of the receiving institution/entity should be amended to include the new record type or series.
 - The records from the sending institution should be managed according to the receiving institution's/entity's records management policy, once incorporated into the record management program of the receiving institution/entity.
 - 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/entities should allow access to records for research purposes. However, that access should be limited to academic need or genealogy.

Academic Documentation Recommendations for Receiving Institutions on Behalf of Closed Institutions

- 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/entity's records management and dissemination policies.
- All records or documents produced should clearly identify the name of the closed institution.
- Where possible, all paper documents issued by the receiving institution/entity should be produced securely, preferably with the name of the closed institution included on each document. If this is not practicable, include an explanation that the document is official and that the institution that originally issued the document is closed.
- A statement should be included in the key or legend verifying the authority of the data custodian (receiving institution/entity) to provide these documents, such as:

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“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.

Fees for Transcripts and Replacement Diplomas

Receiving institutions may charge a reasonable and customary fee for fulfilling student transcript requests and for replacement diploma requests from students of the 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/entity 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.

Ability to Revise Student Educational Records from Closed Institutions

Once an institution/entity becomes the data custodian for a closed institution, it is prudent for the receiving institution/entity 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 records of closed schools, see Appendix A, “State Policies Covering Disposition of Academic Records of Closed Schools” (on p. 27), see also Appendix B, “State Records Management Resources/Retention Schedules (on p. 33).”

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MERGING INSTITUTIONS: GUIDANCE AND BEST PRACTICES FOR INSTITUTIONS INVOLVED IN FULL OR PARTIAL MERGER

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. 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 Change Considerations for Merging Institutions

- How will the institutional name be reflected on the records of former students as well as the institutional name on the records of students who were enrolled at the time of the merger
- How to preserve and honor the name(s) associated with the merging institution(s)
- What will be the financial, social, and emotional impact of a name change on current and former students and on donors
- What will be the cost of replacing signage, letterhead, logos, athletic jerseys, and transcript paper, among other branded items

Institutional Name Change Recommendation for Merging Institutions

- 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.

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 for Maintaining Records for Merging Institutions

- What are the different formats in which records are currently stored, such as hard-copy, digital copy, and microfiche; the date when hard-copy records transitioned to digital records; 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. The more current information and any conversion history shared with the receiving institution, the more prepared the receiving institution will be to maintain the records.

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- As technology changes, make appropriate changes to data storage and transmission in compliance with state regulations.
- What are the additional decisions required during the merger, including changes to biographical/demographical data (i.e. name, address, gender 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. 23).

Recommendations for Maintaining Records for Merging Institutions

- 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
 - Establish short-term teams to define active record reporting needs
 - Create a project plan and tracking system for transferring files for each record type
 - 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
 - Create a project plan and tracking system for each historical record type
- Use reasonable methods by all parties to protect the PII contained in the student education records involved with the merger from further disclosure, except as otherwise permitted under FERPA.¹
- Communicate clearly across units that manage education records during the merger. Take under consideration that administrative units or systems may be phased out as part of a merger.

Recommendations for the Sending Institution in a Merger

- Provide records to the receiving institution electronically using secure means while ensuring data privacy, or in the original file format (e.g. microfiche or hard copy, preferably with the name of the sending institution included on each document).
- 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.
- Notify students of the upcoming merger and that all pre-merger academic records will be frozen (unable to be changed) 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.

Recommendations for the Receiving Institution in a Merger

- Make final decision for the retention of historical records of each record type within their retention schedule.
- Preserve the records from the sending institutions at the receiving institution in a way that identifies the coursework taken
- and any awarded degrees or certificates earned through the sending institution.
- Continue to maintain and update non-academic data such as legal name, addresses and other contact information, as well as other biographical information (with proper documentation), following the receiving institution's policy for such changes.

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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 for the Sending Institution

- 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.
- Notify current and former student, where feasible, about the merger or closure indicating which records are being stored, where the records are being stored, and what the accessibility to those records will be.
- Notify additional agencies that must be informed of an institution's closure or merger, including 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.27), see also Appendix B, "State Records Management Resources/Retention Schedules (on p. 33)."

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."² 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.

Record Retention Considerations

- How the location and format (hard copy vs. digital) of records will 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, etc) as well as degree audit and degree conferral.
- What are the modes of, and systems involved in, record retrieval.

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Record Retention Recommendations

- Use the Merging Institutions Record Retention Worksheet (See Appendix C on p. 36) 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.
- Manage the records from the sending institution according to the receiving institution's 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.
- Follow the retention schedule of the institution with a schedule in place, if the other institution has none. 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 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 being used at the sending institution.

Merging Academic Calendars & Course Scheduling

The academic calendar defines the framework of academic time which consequently affects 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 leave the dissimilar academic calendars as is, especially if students will be unlikely to attend between campuses.

Operating a college or university with multiple calendar systems, however, can create discord between programs and departments, and results in lost synergies and increased administrative burden. Therefore, every effort should be made to synchronize the academic calendar. Harmonizing the academic calendars might seem like a monumental task, however there are some benefits of operating on a single calendar system.

Benefits of a Single Academic Calendar include:

- Reduced restrictions on student enrollment (avoiding "overlapping terms" or "overlapping aid years").
- Increased ability to streamline processes and create administrative efficiencies.
- Reduced confusion for students negotiating add/drop dates, refund dates, withdrawal dates, and other academic deadlines
- Opportunities for consistent policies and deadlines.
- Increased ability for creative, interdisciplinary academic programming.
- Avoidance of additional administrative oversight to ensure compliance with Title IV regulations.
- Reduced National Student Clearinghouse or National Student Loan Data System reporting burden.
- Ability for common conferral dates and commencement ceremonies at appropriate times for all students.

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Academic Calendar 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.³
- 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.
- Whether 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.
- Whether there are exam schedules for unfamiliar programs
- 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.).

Academic Calendar Recommendations

- Harmonize the calendar, as a top priority during a merger.
- Align similar academic calendars
- Review the benefits (if any) of maintaining multiple calendars

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 financial resources 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.⁴ 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.⁵ A typical teach-out plan may include provisions specifying how their students will complete their programs in a reasonable amount of time; what communications will be sent to affected parties (e.g., faculty, students, alumni) informing them of the impending merger or closure; and details of how students may access their institutional records.

Considerations for a Teach-out Plan

- 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 those data and degrees will be recorded and stored.
- Whether students will be given the choice to opt-out of the teach-out plan (and instead pursue completing a different degree), and if so, how that decision will be communicated, tracked, 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 vendor consultation is needed to help identify data incompatibilities, even if both institutions use the same SIS.
 - 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.
 - How the degrees/majors/minors/concentrations/tracks (with different degree requirements) awarded by the sending institution and the receiving institution will be distinguished from one another, if both institutions offered the same curriculum.

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Recommendation for a Teach-out Plan

- Identify and notify eligible students as soon as possible, when a teach-out plan exists.
- Make students 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).
- Communicate all relevant deadlines and processes 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.⁶
- 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).
- Clearly determine whether residency requirements (if applicable) will be enforced or waived.
- 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.

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 one hour of direct faculty instruction, and a minimum of two 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.⁷

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 for the Sending Institution

- 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.
- Transfer course syllabi and catalogs to the receiving institution following the 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 for Managing Course Records

- Whether the receiving institution will continue to offer all courses previously offered by the sending institution.
- Whether the receiving institution has the faculty and facilities to teach the courses previously offered by the sending institution
- How long the receiving institution plans to teach courses previously offered by the sending institution, if that time is limited
- 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.
- Whether courses with the same course number at both institutions are equivalent (contain the same learning outcomes) or not
- Whether courses with different numbers at both institutions are different (contain different learning outcomes) or not
- How past changes to course numbers complicate equating courses between the two institutions
- How assignment of CIP codes may align or not between the two institutions

Recommendations for Managing Course Records

- Perform a review of the course catalog by Academic Affairs
- Transfer the entire course catalog from the sending institution to the receiving institution to ensure accurate historical transcript production.
- Document the retiring of any courses not to be taught again, 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 9/30/2024 for the 2024/25 academic year, the institution would need to be able to access the information in some manner until June 30, 2027. 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.⁸ 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.

ADA (Americans with Disabilities Act) Records

Records associated with accommodations for students living with disabilities may need to be transferred in the case of merged institutions when students will become students of the merged institution. For closed institutions, such records would not need to be transferred.

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.

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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 education benefits to fund their education, and ensure they know who to contact if they have questions.

Terms Used with VA Educational Benefits

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

Requirements for VA Education Benefits

- Review and retain VA educational benefits records 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.
- Follow regulations that 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 three-year period.
- Retain all records until all questions are resolved, in the event of an open audit.⁹

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 |

Recommendations for VA Education Benefits

- Notify their ELR¹⁰ of the closure or merger.
- Notify their State Approving Agency¹¹ 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.

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- 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.

Student Financial Records

Additional information and resources on merging institutions from a business office perspective are available from the National Association of College and University Business Officers (NACUBO) <https://www.nacubo.org/>

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 to facilitate name changes in recognition of sex marker changes.¹²
- 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 three 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.¹³

MERGING INSTITUTIONS: 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 (student information system) 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.
 - What are the 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.
 - Whether student data for active students from the sending institution could be considered as transfer student data
 - 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, including repeat rules and downstream impacts
 - How to 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.
 - Whether the most recent date is considered the final transaction, if activity dates are associated with the data.
- 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)
- Whether to transfer or extend vendor contracts for any student record services, such as transcript production and delivery, CRM (customer relations management), and document imaging.

General Technology Recommendation

- Retain all data in fields where a history of prior values can be stored, or where data types are available.

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Student Information Systems (SIS) Recommendations

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.
 - What are 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.
 - Additional technical questions surrounding workflow of processes through vendor products and new service agreements may need to be addressed.

Access to the Existing System Considerations

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.

- Whether there will be a point in time when access to the SIS is turned off for everyone.
- Whether the former SIS will remain operational to process transcript requests. If so, then consider maintaining access for staff and faculty who advise students.
- Whether view-only access will be needed to allow staff to do their work, while also limiting the amount of staff who would have access to edit records across all campuses.

Access to Existing System Recommendation

- 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), before decisions are made on removing faculty/staff access.
 - 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.¹⁴

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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 closed 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 for an institution that has closed visit <https://education.delaware.gov/families/college-career-life/adult-education/>

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 https://boardofed.idaho.gov/search/?_sf_s=records

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).¹⁵ 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 | | | | |

† Including those programs with a separate admission process from the general application

| 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 | | | |

APPENDIX D

CLARIFYING QUESTIONS

Transparency

- Who are the operational stakeholders to include in these discussions?
- If the term 'merger' is being used, does it accurately reflect the regulatory and accreditation process, or is it being used as a general term to manage perceptions of a closure? It is crucial that those involved in the planning and execution to fully understand the actual classification and its implications to ensure all necessary considerations, related to academic records, financial aid, teach-out plans, and compliance, are thoroughly addressed.
- Is this transition being officially categorized as a closure, merger, or consolidation by your state, accrediting bodies, and regulatory agencies (e.g., accreditors, US Department of Education)? Understanding this classification is essential to ensure compliance with all relevant regulations and to develop a clear plan for academic records, teach-out options, and student support.
- Depending on the official category, have the appropriate requests for waiver/exemption been submitted to accrediting/regulatory bodies?
- What are the needs of the operational staff? While the timeline is often very short, advocating for the availability of resources (staff time, software, expertise) is critical to ensuring successful adherence to professional standards which support ongoing student access to education records.
- Who will determine when the closing institution has completed all necessary steps to cease operations?

Communication

- How are students being informed about the process for obtaining their academic records, both now and in the future?
- In the event of a merger, how are students being informed about the transition process?
- Has a plan been developed to address the needs of enrolled students, applicants, alumni, and those students who may return in the future? Additionally, has the broader community been informed to maintain transparency? Consider creating a dedicated, frequently updated website with FAQs, timelines, contact information, and updates on key milestones to ensure clarity and trust throughout the process.
- Who is the audience for the message? How might this impact the content of your messaging?
- What advice should an advisor give students being impacted by a closure/merger?
- Who is responsible for supporting students as they navigate the transition? What is that person doing to support students?

Student Information Systems

- Have you met with your software vendor? When is it appropriate to do so?
- If the goal is to maintain the academic integrity of student records for all affected students, have the necessary configurations been made in the Student Information System (SIS) that will house and manage these records to ensure accuracy, accessibility, and compliance?
- Do both institutions use the same SIS product and/or vendor? Do naming conventions align between institutions? Are there shared course numbering schemes with both institutions? How will you manage equivalent courses across both institutions?
- Aside from student academic history, how much historical data will transfer to a new SIS?
- What additional data is required for ongoing student education records management (financial obligations, holds, etc.)?

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Record Retention/Validity

- If the institution is closing, how will the legitimacy of degrees already awarded be preserved, and who will verify these in the future?
- Given the nature of the transition, whether a closure, merger, or consolidation, have all regulatory requirements related to the integrity of academic records, fulfillment of graduation requirements, and teach-out plans been thoroughly discussed and documented? Additionally, has the plan identified which Student Information System (SIS) will be used to manage records during and after the transition, ensuring data accuracy and accessibility for students and alumni?
- Are there any items that need to be digitized (e.g., hardcopy transcripts, financial aid files)?
- Have you allocated staff hours to support preparation and digitization of paper records (de-stapling, scanning, indexing)?

Timing Considerations

- How will the speed of a merger or closure impact the timeline?
- When merging, is the receiving institution adopting degrees/curriculum offered at the previous institution? Governance at the receiving institution should consider the additional curriculum if maintaining some or all of the other institutions curriculum. The timing of the receiving institution's curriculum review cycle may also be a factor in these considerations.
- Defining a cutover date is critical to academic operations for the receiving institution. During a merger, considering the beginning of an academic year provides a clear cutover date and hopefully time to determine curricular needs and transfer of student records.
- Will the enduring institution inherit existing codes (CEEB, OPEID, etc.)? Have you communicated your code transition timeline to vendors such as National Student Clearinghouse?

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ADDITIONAL RESOURCES

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

<https://www.cas.edu/>

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

<https://sheeo.org/project/college-closures/>

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

<https://nscresearchcenter.org/college-closures/>

Parchment Registrar Services & Indexing Guidelines

<https://www.parchment.com/pricing/compare-plans/#he-issuing-closed-school-services>

Federal Student Aid, US Department of Education

<https://studentaid.gov/announcements-events/closed-school>

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ENDNOTES

1. See 34 C.F.R. 99.31.
2. American Association of Collegiate Registrars and Admissions Officers. 2019. Student Records Management: Retention, Disposal, and Archive of Student Records. Pg. 36.
3. See <https://ifap.ed.gov/electronic-announcements/110519RevisionGuidelinesApplicableStandardTerms>.
4. 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>.
5. 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>.
6. 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.
7. See 34 C. F.R. 600.2.
8. See 34 C.F.R. 99.3(a)(4).
9. For more information, visit: <https://www.va.gov/school-administrators/>.
10. See https://www.benefits.va.gov/gibill/resources/education_resources/school_certifying_officials/elr.asp.
11. See <https://www.va.gov/statedva.htm>.
12. 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>.
13. American Association of Collegiate Registrars and Admissions Officers. 2019. Student Records Management: Retention, Disposal, and Archive of Student Records. Pg. 21-22.
14. 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.
15. See <https://statearchivists.org>.