



MAINTENANCE AND RETENTION OF RECORDS POLICY

Cultural Center for Language Studies

CCLS maintains accurate and up-to-date information on its students and staff. The institution acknowledges the sensitive nature of these personal documents and so, protects this information accordingly. This policy guides administrative staff in consistently maintaining the accuracy and privacy of these records.

Personnel Files

CCLS faculty and staff has the right to access and review their own personal records under the Vice President's supervision. To gain access to these records, an employee need only allow a maximum of five (5) business days for administrative staff to process the request. The Vice President is responsible for releasing this information. Former employees may also access their records for up to three years upon termination of employment, provided that they allow ten (10) business days for administrative staff to process the request.

A Personnel File is maintained for each teacher and administrative staff member. It is stored in a locked cabinet in the Vice President's office (which is locked at all times). All employment records, including the original application form and/or resume are held therein. It is important that personal data of all employees, such as address, contact information, name change, and tax withholding information be kept accurate and up-to-date. The complete list of documents stored within the personnel file is found on the *Personnel File Checklist* which is attached to each employee file. Each employee is required to report any changes to the school Director who will update the file and submit it to the Vice President for auditing. CCLS will not release personnel files to anyone outside CCLS, unless properly ordered to do so by a competent judicial authority.

Documentation of the instructors' participation in professional development seminars, workshops or conferences, or documentation of any continuing education related to the professional development of the instructor shall be retained in the personnel file.

For office-related purposes only, CCLS will maintain an up-to-date directory of all current teachers and administrative staff telephone numbers and email addresses for use by CCLS personnel *only*. No other use should be made of the information contained in the directory. It is expressly prohibited to furnish any personal information (including phone numbers and email addresses) of CCLS' employees to students, service providers, suppliers, clients, etc.

Student Files

CCLS international active students have the right to access and review their own personal records under the school Director's supervision. To gain access to these records, a student need only allow a maximum of five (5) business days for administrative staff to process the request. The school Director is responsible for releasing this information. For information on inactive students, see "Retention of Student Records Below." The DSOs must furnish these documents to DHS representatives upon request. The Customer Service Associates are responsible for enrolling students and completing all the necessary paperwork. They are guided by an enrollment checklist, the *F-1 Student Document Checklist*, which they attach to the inside of each student's file. The CSAs are overseen by the school Director, who in turn collects the files to store safely in Vice President's office.

A Student File is maintained for each student. It is stored in a locked cabinet in the Vice President's office (which is locked at all times). All student records, including a copy of the passport identification page and F-1 visa page, I-20 Form, financial documentation, application form, and school transcript (upon program completion) are held therein. It is important that personal data of all students, such as address, contact information, and name change be kept accurate and up-to-date. Each student is required to report any changes to the school Director or Academic Coordinator, who will update the file. The only information that is kept on hand in the reception area is students' Miami address and local contact information, health care information, and receipts of payment.

The following indicates how the records are maintained (either electronically, as a hard copy, or both):

- Admissions – Students' Applications for Admission forms are kept on file along with their signed copy of *Maintaining an F-1 Visa Checklist*. Other information related to their student visas and payments are also kept within students' files in the Vice President's office. Students' enrollment forms gather information on the following:
 - Identification of the school, including the name and full address.
 - Identification of the student (identification page of passport and student visa page)
 - Current contact information in Miami
 - In the event the student or his or her dependents cannot receive mail at such physical residence, the school must provide a mailing address in SEVIS. If the mailing address and the physical address are not the same, the school must maintain a record of both mailing and physical addresses and provide the physical location of residence of the student and his or her dependents to DHS upon request.
- Student accounts – Students' records of payment are tracked in our digital accounts system and as hard copy receipts.
- Student grades – Students' academic records are maintained in our digital Student Database system and as hard copies (within the student's file).
- Student transcripts – are issued as hard copies upon program completion and student's request. They are maintained as both hard copies (within the student's file) and as a soft copy (within Student Database Program). They include the following:
 - Student's course of study – course ID code

- Period of enrollment
- Number of clock hours
- Final grade
- Academic status
- Attendance – Like student grades, student attendance is tracked in both hard copy (transcript) and soft copy forms.

Retention of Student Records

To meet Department of Homeland Security regulations, CCLS retains its student records for no less than three (3) years after the student's Last Date of Attendance (LDA). For up to three years after the student's LDA, he can still request access to his file, provided that he allow ten (10) business days for administrative staff to process the request. If CCLS recommends reinstatement for a student who is out of status and it is denied, the school will maintain records on the student for three years from the date of the denial.

Backing Up Student Academic Records

In order to preserve and protect our records, CCLS backs up its server both externally and internally. Our internal back up occurs continuously on a 2 TB external hard drive. Externally, our server is backed up daily, using Windows One drive, a cloud storage service.

Privacy

CCLS active students and staff have the right to access and review their own personal records. To gain access to these records, a student or staff member need only allow a maximum of five (5) business days for administrative staff to process the request. The Vice President is responsible for releasing this information.

All information stored on CCLS' SPD (Student Database Program) is password protected and for internal use only. All personal information, such as a student's permanent home address, passport info, and financial information is strictly confidential. Violation of this confidentiality will result in disciplinary action up to and including termination.

Taking pictures or making unauthorized copies of students' or employees' records, data, or information is strictly prohibited. Violation of such policy will result in disciplinary action up to and including termination.