



MAINTENANCE AND RETENTION OF RECORDS POLICY

Cultural Center for Language Studies

CCLS maintains accurate and up-to-date information on its students and staff, as well as adjunct instructors. 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 or adjunct instructor 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. Adjunct instructors' information is also kept in a file. Files are either stored in the Vice-President's own hard drive or in a locked cabinet in the Vice President's office. It is important that personal data of all employees and adjunct instructor, such as address, contact information, name change, and tax withholding information be kept accurate and up to date. Personnel and adjunct instructors are required to report any changes to the school Director who will submit it to the Vice President for safe keeping. CCLS will not release personnel or adjunct instructor files to anyone, unless properly ordered to do so by a competent judicial authority.

Documentation of the instructors' participation in professional development events or documentation of any continuing education related to the professional development of the instructor shall be retained in the CCLS server.

For office-related purposes only, CCLS will maintain an up-to-date directory of all current teachers, adjunct instructors 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 and adjunct instructors to faculty, 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 or Academic Coordinator'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 organizing their documentation. They are guided by an enrollment checklist, the *F-1 Student Document Checklist*. The documents are numbered according to the checklist items. The CSAs are overseen by the school Director or Academic Coordinator, who will verify the files.

A Student File is maintained for each international student. It is either stored in a locked cabinet in the Vice President's office (student files prior to 2020) or electronically. 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 following indicates how the records are maintained (either electronically or as a hard copy):

- Admissions – Students' Application for Admission forms are kept online. Other information related to their student visa are also kept within students' files in the Vice President's office (prior to 2020) or electronically. Students' enrollment forms gather information on the following:
 - a. Identification of the student (identification page of passport and student visa page)
 - b. Current contact information in Miami (if applicable)
 - In the event the student or their 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 their dependents to DHS upon request.
 - c. Student accounts – Students' records of payment are tracked in our digital accounts system (Quickbooks).
 - d. Student grades – Students' academic records are maintained in our digital Student Database system CCLS-SPD).
 - e. Student transcripts – are issued upon students' request. They are maintained as a soft copy within Student Database Program. They include the following:
 - e.1 Student's course of study – course ID code
 - e.2 Period of enrollment
 - e.3 Number of clock hours
 - e.4 Final grade
 - e.5 Attendance

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, they can still request access to his file, if they allow ten (10) business days for administrative staff to process the request.

Backing Up Student Academic Records

In order to preserve and protect our records, CCLS backs up its server externally daily, using Carbonite, 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.