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## Admissions Records Policy

### Type

**Academic (relates to academic affairs generally, faculty and/or student affairs)**

### I. Rationale

The purposes of this policy are to 1) establish a framework for access, use, retention, and destruction of Admissions Records maintained by Baylor College of Medicine (BCM or College), and 2) ensure the College complies with all applicable laws, regulations, and standards when handling, accessing, or disclosing this type of Education Record.

### II. Stakeholders Affected by this Policy

Compliance with this policy is mandatory for all BCM employees that generate or handle Admissions Records. Other types of Education Records are governed by the Student Records Policy (23.1.06).

### III. Definitions

- (a) **Admissions Records** include all standard and supplemental application materials and supporting documentation submitted to BCM by Matriculants and Non-Matriculants, as well as any other information required for acceptance to any BCM school or program including, but not limited to, any application forms (e.g., AMCAS, BCM Supplemental Application); letters of recommendation; acknowledgement forms; transcripts; letters of evaluation; screening and interview evaluations; Applicant correspondence (e.g., emails, letters, cards); deposit letter; state of residence questionnaire; acceptance letters.
- (b) **Education Record**, as broadly defined by the [Family Educational Rights and Privacy Act \(FERPA\)](#), 20 U.S.C. § 1232g, refers to a College record in any format (e.g., paper, electronic) that either identifies a student by name or contains PII or other descriptive information that would allow a person to deduce the student's identity (either alone or in combination with other publicly available information). For the purposes of this policy, Education Records fall into one of four categories: Academic, Admissions, Non-Academic, and Health. Academic, Non-Academic, and Student Health Records are defined and governed by the [Student Records Policy \(23.1.06\)](#).
- (c) **Confidential information** includes, but is not limited to, proprietary research, clinical, academic, administrative, and affiliate institution information; financial information; intellectual property; student and employee PII; non-clinical PII (e.g., human subject research); and PHI.
- (d) **Custodian** refers to the senior departmental administrator (or designee) in each College department, office, center, and organizational unit that is responsible for storing, retaining, and destroying Records as described in the College's Record Retention Policy (08.4.05).
- (e) A **Matriculated Student (Matriculant)** is a student who applies to a degree-granting program at any BCM school and enrolls upon notice of acceptance.
- (f) A **Non-Matriculant** is an individual who applies to a degree-granting program at any BCM school and does not enroll, regardless of whether the individual is accepted or rejected.
- (g) **Personally Identifiable Information (PII)** means any information that can be potentially used to identify, contact, or locate an individual.

- (h) **Protected Health Information** is defined in the [HIPAA Glossary of Terms](#).

## IV. Policy

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- A. **Integrity & Security.** BCM ensures the integrity of its admission policies and procedures by preventing unauthorized access to, or modification of Admissions Records, and safeguards the autonomy of school or program admissions committees and/or Admission Deans to guide the selection of candidates, by maintaining appropriate oversight and security measures. Special security measures, which are technical, physical, and administrative in nature, emphasize the value of this Confidential Information to the College and protect the integrity of Admission Records. Admissions Records must be secured in accord with applicable state and federal laws as well as and commonly accepted standards and practices among institutions of higher learning described in the Student Records Policy (see 23.1.06, Section IV.A.5.a-d).
- B. **Confidentiality.** Only school officials with a “legitimate educational interest,” as defined by FERPA, will be permitted to access Admission records. In accordance with relevant accreditation standards, BCM faculty members responsible for managing the admission process (e.g., committee members, deans) must make every effort to ensure that all Admission Records remain confidential in accordance with the FERPA.
- C. **Access.** Employee access to admissions documents requires direct participation in the admissions process, and the scope of access is limited as follows:
1. Members of each school Admissions Committee and subcommittee(s) as well as participating interviewers have access to appropriate admissions documents (as indicated by applicable accreditation standards and/or committee procedures), except those completed by other committee members;
  2. An author may view a specific admission document he/she has created;
  3. Employees of each BCM school’s Office of Admissions may review pertinent documents during the performance of their assigned duties; and
  4. Other school officials may review documents necessary for the performance of admissions related business, at the discretion of each BCM school’s Admissions Dean(s) or equivalent.
- D. **Use.** Admissions documents collected or generated during the admissions process are to be used solely for the purpose of admission to the BCM school/program to which the student applies.
- E. **Storage.** Admissions Records must be stored in the Admissions Office maintained by each BCM school/program, and may be accessed or removed only for Admissions Committee meetings or purposes listed below while the Records remain active.
- F. **Disclosure.** Upon request, Applicants are provided with the names of the individuals submitting letters of evaluation which are placed in their files until such letters are disposed of. Applicants are not entitled to examine or inspect application materials received by BCM, though BCM may confirm receipt.
- G. **Retention.** Admissions Records are considered Active Records during the admissions process. Post enrollment, these Admissions Records become Inactive Records, as defined by the Record Retention Policy (08.4.05).
1. **Matriculants.** The School Dean or Designee (e.g., admissions committee) may mark Matriculant Admission Records for permanent retention in a manner consistent with applicable laws, regulations, and standards (see [Section X](#), below). Consistent with the Student Records Policy (23.1.06), Admission Records marked “permanent” are transmitted to the Registrar upon enrollment and will be retained as an Academic Record, as described in the Record Retention Policy’s Record Retention Schedule (see 08.4.05, Section VI.A).
    - a. Other Admission Records containing Matriculant information, e.g., letters of evaluation, screening evaluations, and interview evaluations are retained until student enrollment, which triggers destruction of these files unless an academic program indicates an alternative retention period in the Record Retention Schedule (e.g., DNP, PA).

- b. De-identified demographic data about Matriculants, including but not limited to race, ethnicity, sex, and veteran status may also be retained in each School Dean's Office for the purpose of monitoring enrollment trends. For the purposes of this policy, de-identification refers to the process of removing information that would identify a specific person (e.g., name, address).
2. Non-Matriculants. Admissions Records containing Non-Matriculant information are usually only preserved until the class for which they applied enrolls. Admissions Records of Non-Matriculants are destroyed after the enrollment period ends, unless an academic program indicates an alternative retention period in the Record Retention Schedule (e.g., DNP, PA).
  - a. De-identified demographic data about Non-Matriculants, including but not limited to race, ethnicity, sex, and veteran status may also be retained in each School Dean's or designee's Office for the purpose of monitoring enrollment trends.

## V. Responsibilities

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- A. Admission Deans & School or Program Admissions Committees are responsible for securing Admissions Records and self-monitoring compliance with this policy by:
  1. Ensuring that appropriate Admission Records of Matriculants are transferred to the Office of the Registrar and added their permanent record, and
  2. Ensuring that Admission Records of Matriculants and Non-Matriculants are destroyed according to the retention schedule described above.
- B. The Office of the Registrar will serve as the Custodian of Matriculant Records that are marked for permanent retention, which will be added to the Matriculant's Academic Records.

## VI. Procedures for Implementation and Review

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This policy will be reviewed every two years but may be updated as necessary to remain compliant with applicable laws, regulations, and standards.

## VII. Stakeholder Compliance

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N/A

## VIII. Tools

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N/A

## IX. Related Policies

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- [08.4.05 – Record Retention Policy](#)
- [23.1.06 – Student Records Policy](#)

## X. Applicable Laws, Regulations & Standards

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### A. Laws & Regulations

- American Association of College Registrars and Admissions Officers' (AACRAO) Retention, Disposal, and Archive of Student Records Handbook (2013)
- [Family Educational Rights and Privacy Act \(FERPA\)](#), 20 U.S.C. § 1232g;
- [FERPA Regulations](#), 34 CFR Part 99;
- [Association of American Medical Colleges \(AAMC\) – Guidelines for Maintaining Active and Permanent Individual Student Records \(2015\)](#)

### B. Institution & School Accreditation Requirements

- [Accreditation Council of Graduate Medical Education \(ACGME\) Common Program Requirements](#)
- [Liaison Committee on Medical Education \(LCME\) Standards: Functions and Structure of a Medical School](#) (see Standards )
- [Southern Association of Colleges and Schools Commission on Colleges \(SACSCOC\) Accreditation Standards](#) (see Standard 10.5)

**C. Program Accreditation Requirements**

- [Accreditation Council for Continuing Medical Education \(ACCME\)](#)
- [Accreditation Council for Genetic Counseling \(ACGC\)](#)
- [Accreditation Review Commission on Education for the Physician Assistant, Inc. \(ARC-PA\)](#)
- [American Society of Tropical Medicine and Hygiene \(ASTMH\)](#)
- [Council on Accreditation \(COA\) of Nurse Anesthesia Educational Programs](#)
- [Commission on Accreditation of Allied Health Programs \(CAAHEP\)](#)
- [National Commission on Prosthetic and Orthotic Education \(NCOPE\)](#)