



Access to Medical Student Education Records

Senior Leader: Medical School Dean

Policy Owner: Senior Associate Dean for Undergraduate Medical Education

Responsible University Officer: Medical School Registrar

Policy Contact: Medical School Registrar, medregistrar@umn.edu

Policy Statement

The University of Minnesota Medical School maintains individual records and information about matriculated students for the purpose of providing educational and personal services to its students. This policy ensures that the medical school meets all State, Federal (i.e. FERPA), and University of Minnesota compliance standards regarding the confidentiality of, and access to, education records.

It is Medical School policy to be fully compliant in the confidentiality of matriculated student education records (also known as the Student File). The following guidelines and procedures define:

- the scope of what constitutes an Education Record,
- ensure the confidentiality of student Education records,
- establish the rights of matriculated students to inspect and review their Education Records,
- clarify the circumstances under which Education Records may be released to third parties,
- establish the appropriate procedures to be followed for the amendment of inaccurate or misleading data within the Education Record
- clarify the timeframe for the retention and destruction of records

Procedures

Contents of an Education Record: An Education Record may include contact information, official matriculated student correspondence, USMLE scores, grades, narrative performance assessments, notifications of honors, information about leaves of absence, combined degree enrollment information, scholarship award letters, records of disciplinary action, documentation related to transfer to or from the medical school and withdrawal or dismissal. Matriculated students can refer to Section III of the [Board of Regents Policy on Student Education Records](#) for further clarification on the definition of an Education Record.

Location of Education Records: A matriculated student's Education Records are not maintained in one central location. Matriculated students interested in viewing their Education Record should direct their request to the appropriate department, unit or school official on the relevant campus (Twin Cities or Duluth) who maintains the file housing that record as outlined below.

- **Office of Admissions** – The Office of Admissions on each respective campus maintains the applications of applicants to the Doctor of Medicine degree, including the American Medical College Application Service (AMCAS) application, and all admissions decisions made by the Admissions Committee electronically in the Electronic File Review (EFR) or Application

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Processing Tool (APT) systems. Students should direct requests to inspect these Education Records to the Admissions Deans on the appropriate campus.

- **Office of Financial Aid** – The Office of Financial Aid maintains records of Students' applications for financial aid, including scholarship award letters, and any supporting documentation. Students should direct any request to inspect Education Records housed within this office to the Financial Aid Director.
- **Office of Student Affairs** – The Office of Student Affairs on the Twin Cities Campus maintains the Medical Student Performance Evaluation (MSPE). Decisions under the Medical Student Scholastic Standing Committee are maintained through the Office of Student Affairs on the Twin Cities Campus. Students can direct requests to inspect these Education Records to the Office of Student Affairs.
- **Medical Student Records Office** – This office maintains the official academic record of a Student's cumulative history at UMMS. The Records Office file includes, but is not limited to: registration, academic performance (e.g. grades), and limited demographic and biographic information. Students can direct any requests to inspect Education Records housed within this office to the University of Minnesota Medical School Records Manager.

Right to Inspect Education Records: matriculated students have the right to review their own Education Records, either in physical or electronic form, in the presence of a Medical School or University official. This school official shall have sole discretion over the form of the record, based on availability, ease of access, or other considerations.

Matriculated students wishing to view or obtain copies of their Education Record must submit a request, in writing, to the appropriate office or school official. Once a request is received, the office shall comply with the request within a reasonable amount of time, not to exceed 45 days after receipt of the request, in compliance with the Family Education Rights & Privacy Act (FERPA) of 1974.

In cases where it is appropriate for a matriculated student to obtain copies, the Medical School may impose fees and requests for copies may be denied in cases where there is an administrative hold on the Student's record. The matriculated student may still view their Education Record, but copies will not be made until such holds are resolved.

Limitations on the Right to Inspect and/or Obtain Copies of Education Records:

- A matriculated student may not inspect or obtain copies of financial records and information about his/her parents.
- A matriculated student may not inspect or obtain copies of portions of an Education Record that contains information about more than one student. In which case, the Medical School or University may redact any content not related to the requesting student and/or limit inspection to documents in cases where it is not feasible to de-identify content about other students.
- Matriculated medical students have the right to request access to components of their Admissions file, however, letters of recommendation are not made available to matriculated students if they waived their rights to review these letters at the point of their initial application to medical school. Some components of the admissions record are transferred to the Office of Student Affairs upon matriculation and are maintained in the Medical School's Medical Education Information System (MEdIS). Matriculated students may obtain copies of their American Medical College Application Service (AMCAS) application and/or request that their AMCAS be forwarded to other programs by contacting the AMCAS directly.
- Matriculated Students are permitted an opportunity to inspect their Medical Student Performance Evaluation (MSPE) for factual and/or grammatical accuracy only but waive the right to obtain copies of the MSPE or inspect/obtain copies of any letters of recommendation submitted in support of their Residency applications. Students and graduates of the Medical School may not

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ever possess a copy of their MSPE. However, the Medical School will forward a copy of a student's MSPE to potential Residency and Fellowship programs upon written request.

Disclosure to Third Parties: Among other exceptions authorized by FERPA, prior consent of the student is not needed for disclosure of directory information. For a more complete list of situations where student consent is not required, refer to the University's **Appendix to Policy: ["Persons and Institutions That May Receive Information Without Student Permission"](#)**

Legitimate Educational Interest:

As authorized through FERPA, the UMMS limits access to those with a "legitimate educational interest," when determining who has permission to review a medical student's file. The table below provides a summary of the categories of individuals who have access to student information and what information they are able to access.

Who Can Access . . .

Categories/Role	Course information	Grades	Health & Disability
Faculty	Course and clerkship faculty have access to student information (ie, course rosters, syllabi) in the courses they teach	Course/Clerkship Directors only have access to the course(s) they oversee	Faculty have no access to health information Faculty have no access to disability status or diagnoses; accommodations letters only if provided by student
Administrators	The Offices of Student Affairs (OSA) and the Records Office have access to course information for all students. Course Managers in the Office of Curriculum have access to course-specific information (ie, course rosters)	Course Coordinators have access to grades within their specific course/clerkship Records Office has access to final grades for all students	OSA and the Records Office - access limited to overall immunization status to ensure compliance The Disability Resource Center (DRC) - access to disability status and diagnoses; OSA and the Records Office - access limited to accommodation letters
Academic/Faculty Advisors	Access to their advisees' registrations, course histories, and grades. They may have qualitative performance information within a course for purposes of intervention	Access to advisees' grades	Access to immunization compliance status only
Educational Data Staff	May have access to medical students records for the purpose of building and maintaining data systems and reporting	May have access to medical students records for the purpose of building and maintaining data systems and reporting	No Access

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Disclosures Requiring Student Consent: Except as noted above all requests for disclosures of Education Records must be accompanied by the written consent of the matriculated student. Students should check with the relevant school official who maintains the specific Education Records to determine whether that office/department/unit has a specific consent form they require. At minimum, the essential elements of consent include explicit approval by the student (either in the form of a signature, ID#, or other identifier unique to the student), specify the records to be disclosed, provide the date, and identify the party or parties to whom the disclosure will be made.

Recordkeeping of Disclosures: Except in cases of a matriculated student requesting access to their own Education Record, the University will keep a record of each request that has been made for personally identifiable information. This information will be kept with the student record. For further details on the recordkeeping process, individuals should refer to the University's [Administrative Procedure: Assuring Student Rights Regarding Education Records](#)

Amending an Education Record: A matriculated student has the right to request an amendment to his/her Education Record if he/she believes it is inaccurate, misleading, or otherwise in violation of his/her privacy rights.

As per the University's operating procedure on amendments to Education Records, the request must be in writing, signed and dated by the student (or provide a unique identifier in the case of electronic submissions), and must include sufficient information to identify the challenged record and a statement of the reason the amendment should be made.

By state law the school official must decide within 30 days of receipt of the request to amend the records in accordance with the request. If the school official decides that the information contained in the Education Record is inaccurate, misleading, incomplete, or otherwise in violation of the student's privacy or other personal rights, they will amend the record accordingly and inform the student in writing.

If the school official denies the request to amend the record they must inform the student in writing, indicating the reason for refusal. They must also advise the student of their right to a hearing to challenge the content of the record, and their right to place a statement in the education record commenting upon the information. For details on the process for appealing a decision to amend an Education record, individuals can refer to the University's [Administrative Procedure: Students Managing Their Education Records](#)

Retention and Destruction of Records: the UMMS conforms to the University of Minnesota's [Records Retention Schedule](#). Those interested in determining how records are retained should refer to this Schedule for each record type.

Forms/Instructions

Matriculated students wishing to inspect their Education Record, or to request access to Education Records as a third party should contact the appropriate office in which the Education Record is housed to inquire about the specific procedures for access.

Appendices

- For a more complete list of situations where student consent is not required for disclosure of Education Records to third parties, refer to the University's *Appendix to Policy: Persons and Institutions That May Receive Information Without Student Permission* by visiting <https://policy.umn.edu/education/studentrecords-appa>
- For details on the process for requesting an amendment to an Education Record, or to appeal a decision to amend an Education record, individuals can refer to the University's *Administrative*

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Procedure: Students Managing Their Education Records by visiting <https://policy.umn.edu/education/studentrecords-proc05>

- Individuals wishing to learn more about the *Family Educational Rights & Privacy Act* can visit <https://studentprivacy.ed.gov/ferpa> and the University of Minnesota Board of Regents Policy on *Student Education Records* https://regents.umn.edu/sites/regents.umn.edu/files/policies/Student_Education_Records.pdf

Additional Contacts

Role/Title	Contact	Fax/Email
Medical School Registrar – Twin Cities & St. Cloud	Carly Siewert	medregistrar@umn.edu
Medical School Registrar – Duluth	Stephanie Appleby	sappleby@d.umn.edu
Office of Financial Aid – Twin Cities & St. Cloud	Kristin Basballe	parrx008@umn.edu
Office of Financial Aid – Duluth	Dina Flaherty	dflahert@d.umn.edu
Office of Admissions	Carrie Costantini	ccost38@umn.edu

Definitions

Directory Information*

Directory information shall mean the student's name, address, electronic (email) address, telephone number, dates of enrollment, enrollment status (full-time, part-time, not enrolled, withdrew, and date withdrawn), major, adviser, college, class, academic awards and honors received, and, upon graduation, the degree awarded.

Legitimate Educational Interest*

Legitimate educational interest shall mean an interest in reviewing student education records for the purpose of performing an appropriate University research, educational, or administrative function.

Student Education Records*

Student education records shall mean any record maintained by the University that contains personally identifiable information about a student, regardless of its format or method of storage. Student education records shall not include law enforcement records maintained separately from education records, University employment records, and medical or psychological counseling records, all of which are protected according to provisions of state and federal law and University policy.

School Official*

School official shall mean a person employed by the University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the University has contracted to perform an institutional service or function in accordance with law; a person serving on the Board of Regents; or a student serving on a University committee or otherwise assisting another school official in performing institutional tasks.

* As defined in the University of Minnesota Board of Regents Policy on *Student Education Records* https://regents.umn.edu/sites/regents.umn.edu/files/policies/Student_Education_Records.pdf

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LCME Accreditation Relevance

This policy ensures the medical school meets LCME Accreditation requirements as follows:

Element 11.5: CONFIDENTIALITY OF STUDENT EDUCATIONAL RECORDS. “At a medical school, medical student educational records are confidential and available only to those members of the faculty and administration with a need to know, unless released by the student or as otherwise governed by laws concerning confidentiality.”

Element 11.6: STUDENT ACCESS TO EDUCATIONAL RECORDS. “A medical school has policies and procedures in place that permit a medical student to review and to challenge the student’s educational records, including the Medical Student Performance Evaluation, if the student considers the information contained therein to be inaccurate, misleading, or inappropriate.”

History

Amended: October 2011 – Approved by UMMS Education Council November 2011

Amended: September 2018 – Policy Revisions Outside of Comprehensive Review

Effective: October 2011

Reviewed and Updated: UMMS Registrar, August 2021

Reviewed and Approved: Senior Associate Dean, UME, June 2023