

# STUDENT RECORDS

## The Cumulative Student Record

### INTRODUCTION

The "cumulative folder" is supposed to be the "working record" used by the instructional professional staff to understand the individual student. It is also supposed to be continuous and current, which contemplates on-going additions as well as periodic or routine weeding, culling or purging. When a student terminates the relationship with your school or school district (typically by transfer or graduation), information in this file should be reduced to the basic requirements of the permanent record.

The definition of cumulative record is found only in the Iowa Department of Education's rules for accredited schools: **281 Iowa Administrative Code 12.3(4)**.

### CONTENTS OF THE CUMULATIVE RECORD

To achieve the concept of a working record, the following items are recommended to be included in a student's cumulative folder:

- all "permanent record" information;
- standardized test results, intelligence/aptitude test results; other district-wide assessment results;
- health information (i.e., immunization records, emergency/health card);
- current accommodations in the education environment (e.g., dated 504 plan, dated health plan, dated copy of most recent IEP);
- discipline records (e.g., reports of in- and out-of-school suspensions or expulsions only; individual behavioral "contracts" or "last-chance agreements");
- co- and extra-curricular activities, honors, awards, recognition;
- report cards; enrollment card;
- relevant legal documents (e.g., custodial orders in decrees, no-contact or restraining orders that affect the student, ChINA or delinquency decrees, competent private instruction reports and assessment results or portfolio evaluations, legal name change orders, and any other legal document that impacts how the school serves the child);
- significant parental consents/refusals (e.g., human growth and development opt-outs or requests; directory information opt-outs, special education testing and placement consents **if not maintained elsewhere**).

### STORAGE OF CUMULATIVE RECORDS

The D.E. rule does not speak to the location of the cumulative folder. Most districts store these records in the building where the child attends. They may be maintained by a secretary, the principal or assistant principal, a guidance counselor, or some other employee designated as records custodian. The records are, of course, confidential to the extent that only a person with "a legitimate educational interest" has access, so the files should be locked or, if stored electronically, password protected. (More and more, even cumulative records are being stored electronically; if so, caution would dictate that a backup disc be updated periodically and the disc stored separately in a safe place.)

## ADVICE AND REMINDERS

- Free and Reduced eligibility information data are NOT to be stored in student records. Other material that should not be placed in a cumulative or permanent folder includes child abuse reports, individual day-to-day student work (including "refrigerator art"), on-going communications with parents, field trip consents (unless "standing" or "permanent"), routine correspondence, absence notes, and minor disciplinary actions. Remember, the student's parent has access to the student's records at any time, so don't put anything in a student's folder that you would not feel comfortable sharing with the parent or having the parent see.
- If a parent who believes that a student record is "inaccurate, misleading, or in violation of the child's privacy rights" he or she may request that something in a record be amended or deleted. If this request is refused, the parent may initiate the records amendment procedure. This includes the right to a local "hearing," and if the issue is not resolved through the hearing, the parent has the right to add their comments to the contested record, and those comments must accompany any release of the disputed record. Ultimately, the decision to maintain or remove the record or document at issue is the school's. If it is accurate (or was when it was created) and is still educationally relevant, it should remain.
- Don't forget that a log must be maintained with the student's record, and the records custodian is supposed to determine that any school "official" accessing a student's folder has a "legitimate educational interest" in doing so. The log should indicate the date, person accessing the record, and the reason for doing so. There is no necessity to have anyone "sign in."
- To maintain the concept of "current," cumulative records should be reviewed periodically, and particularly when a student moves from elementary to middle school or junior high, and again to high school, and, of course, upon graduation.
- Originals of records should always remain with the (sending) school. When a student transfers, a **copy** of his or her cumulative record is to be sent to the new receiving school, where it becomes the "original" to them. It is not wise to allow students or parents to hand-carry copies of their records to the new school upon transfer as the records could be altered. (However, the Department's rules specify that you must accept hand-carried copies of records if an enrolling student is homeless. This assumes the sending district must be required to allow the parent or guardian of a homeless child to take copies with him or her.)
- Finally, accredited schools in Iowa may not withhold or refuse to send copies of records for any reason, including fees owed, when a student transfers.