

## **Guidelines for the Preservation of Student Records by Massachusetts Institutions of Higher Education**

A Massachusetts institution of higher education ("IHE") chartered by the Commonwealth of Massachusetts or approved by the Board of Higher Education (the "BHE" or "Board") of Massachusetts to grant degrees, and that is planning to close or merge with another IHE or entity, (M.G.L. c. 69, § 31B, 610 CMR 2.07(3)(f)(2)), and an IHE required to submit a Contingency Closure Plan (CCP) under the BHE's Financial Assessment and Risk Monitoring process (610 CMR 13.00) must establish a plan for the transfer and long-term maintenance of student records, including but not limited to student transcripts. This plan must also indicate where and how such records will be transferred to a custodial institution that will assume the obligations of managing the student records according to these Guidelines.

To ensure IHEs comply with the requirements of and expectations for a student records maintenance plan (610 CMR 13.04(1)(a)(2)), the Department of Higher Education (the "DHE" or Department) has developed the following guidelines for preserving student records.

### **Definition of Student Record**

The Board defines a student record as "information and documents relating to a student's academic career and the institution's academic offerings including, but not limited to, transcripts for students who are currently attending the institution or have attended the institution; graduation lists or other comparable academic documentation for students who have graduated from the institution; and college catalogs" (610 CMR 13.02).

A Massachusetts IHE must retain and preserve all student records for a period of 60 years (610 CMR 13.04(1)(a)(2)) following a student's graduation or separation from the institution.

### **Condition of Student Records**

Student records must be in a digitized, accessible, indexed, searchable, and readily convertible, portable format.

If the IHE plans to use a third-party provider (e.g. Parchment) to issue transcripts, the following minimum identifiers, should be preserved and appropriately indexed (and exportable to a common spreadsheet format) for each student record:

- First name;
- Last name;
- Date of birth;
- Last four of social security number;
- Student ID number; and

- Graduation Year (or last year of attendance).

Neither the Board nor the Department makes any warrant or claim as to the specific requirements of any third-party entity regarding records management, validation, or issuing of credentials; these common data elements are recommended for minimum preservation purposes. However, records custodians may require maintenance and preparation of additional data elements depending on the records maintenance system requirements.

### **Student Records Custodian**

The IHE should make every effort to place its student records, as defined above, with another higher education institution, or in the alternative with an entity that will be able to provide registrar services that conform to generally accepted industry practices. This will help ensure handling of student records is managed at a high professional level to safeguard access to and confidentiality of records for former students and graduates of the closing or potentially closing institution.

The Department on behalf of the Board reserves the right to approve the designation of a custodial institution or entity in reviewing student records maintenance plans as components of contingency closure plans or notice of closure templates subject to Department approval.

### **Student Records Maintenance Plan**

As part of its Notice of Closure (NOC), in the case of an institution that is closing, or its CCP submission, an IHE must submit a Student Records Maintenance Plan. The plan must be comprehensive and include all of the following:

- Description of all student records held by the IHE, including those from other, closed Institutions for which the IHE serves as custodian.
- The estimated or actual cost (based on a recent vendor quotation) of protecting and maintaining all student records from at least the past 60 years, and verifiable information as to how these costs will be met by the institution in the event of a closure (or merger). The Department on behalf of the Board reserves the right to request an update of the cost and funding thereof at any time in the NOC or CCP processes.
- A plan and timeline for ensuring that all student records covered by the institution's Student Records Maintenance Plan are in a digitized, accessible, indexed, searchable, and readily convertible, portable format, and made accessible to former students.
- Provide specific information regarding how and where student records would be maintained, including the name and address of the successor institution or entity, and contact information for the individual or department at the successor institution that will have responsibility for the preservation of the records and providing access to them for graduates and former students.

- A communication plan that will or would be used to inform current and former students and graduates on how and where their transcripts can be obtained.
- A Student Records Maintenance Plan **may** include other elements, such as how to obtain a duplicate diploma, or how to request records older than 60 years from date of last attendance or degree conferral. While these elements are generally not required for minimum compliance with the BHE's standards in this regard, the Board and Department reserve their respective rights to require such arrangement to be made in the event the circumstances reasonably warrant the making of such arrangements.

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