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**POLICY FOR THE CONSERVATION AND SAFEKEEPING OF EDUCATIONAL RECORDS IN THE EVENT THE INSTITUTION SHOULD CEASE OPERATIONS****Statement of Motive and Purpose:**

In compliance with the provisions of the Puerto Rico Council of Education as stated in their Regulation for the Licensing of Higher Education Institutions of Puerto Rico Certification Number CEPR 2021-053 of April 2021, San Juan Bautista School of Medicine has developed measures and procedures to protect, secure and conserve all educational academic records that contain confidential student documents in the event SJBSM should cease operations.

**Security and conservation of educational records:**

The Buckley Act (Family Educational and Privacy Act of 1974, as amended - FERPA) defines a "student education record" as all information that is directly related to an eligible student and maintained by an educational agency or institution or by a party acting for the educational agency or institution in paper or electronic format. As established in our Executive Order 909-03, it is the school's responsibility through the Registrar's office to ensure that all educational records are kept in strict confidentiality.

The Registrar's office is custodian of the academic records of active and inactive students. Academic records are stored in a vault. SJBSM has taken the necessary steps to ensure that the vault is secure with a security system against theft or vandalism. The vault also has a fire protection system and its physical facilities are free from leaks and floods, to ensure that the educational records are secure in the event of a natural disaster.

**Backup System of academic records:**

The Registrar's office maintains a customized database system where data related to the student's demographic and academic record, such as contact information, enrollment data, approved courses, withdrawals, credit transcripts are kept from admission to completion of degree and/or withdrawal.

San Juan Bautista School of Medicine also has an IT Department that manages the database and is responsible for safeguarding all registered data, protecting it a backup system in order to ensure data protection. The IT Department copies the data from educational records in its entirety on a daily basis to an internal back up system, and to an external cloud system. The IT Department always makes sure to maintain previous versions of the safeguards.

## **Conservation of Student records in the event of closure**

In the event that SJBSM should determine to cease operations, SJBSM shall proceed as follows:

1. SJBSM will provide a mechanism to ensure that students and alumni may have access and continue to receive the services of registrar including copies of official transcripts, diplomas and pertinent information regarding their academic history.
2. In the event that SJBSM retains all academic records, the institution will notify the Board of Postsecondary Institutions information regarding physical address, phone numbers, contact information and any additional information needed so that student's alumni may request and receive said services.
3. If the institution has no entity that may retain the academic records and provide continuity to students and/or alumni, SJBSM will submit copies of the diplomas and credit transcripts of each student to the Department of State in the format established by at the Secretary of State, after having certified that the documents are complete and accurate.

## **Public notification**

SJBSM will make a public announcement no less than sixty (60) days in advance notifying the student body and alumni of its intent to cease operations, with pertinent information as to where the academic records will be stored and instruction on how they may access them.

## **Effectivity**

The disposition contained in this Executive Order will be effective immediately.

  
YOCASTA BRUGAL, MD  
President/Dean

APPROVED: November 16, 2013  
REVISED: February 12, 2015  
January 21, 2020  
July 15, 2021