AACRAO'S GUIDE FOR RETENTION AND DISPOSAL OF STUDENT RECORDS: A CRITICAL REVIEW
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Retention of Records: A Guide for Retention and Disposal of Student Records, published in 1979 by the American Association of Collegiate Registrars and Admissions Officers (AACRAO), is an attempt by academic administrators and records managers to provide "reasonable standards to assist student records managers in making record retention decisions." The guide addresses complex issues and concerns, including the impact of the "Buckley Amendment." Formed in 1910, AACRAO is a professional association of educators from collegiate level institutions. Its general purpose is to promote the advancement of higher education. Its specific purposes are to advance professionally the management and efficiency of offices of admissions, financial aid, institutional research, records, and registration, and related areas. This well-established organization represents the interests and concerns of "front-line" operating units in colleges and universities. The members of AACRAO create and control the active student record. Long before most college and university archives existed, admissions officers and registrars were confronting the issues of records retention. As early as the 1920s AACRAO was publishing lists describing records that it considered unworthy of permanent retention. However, access, confidentiality, and storage are concerns that vary enormously from institution to institution. It is not surprising that records retention did not become a pressing issue until the dramatic expansion of higher education in the post-war years.

In 1960, AACRAO issued its first comprehensive statement of its position on records disposition with the publication of Retention of Records: A Guide for Registrars and Admissions Officers in Collegiate Institutions. The 1960s and early 1970s brought considerable changes in the field of records management and in the fall of 1973 AACRAO distributed a questionnaire to aid in updating its 1960...
schedule. Before the new guide was published, the Buckley Amendment became law. Rather than publish a new guide in such an uncertain environment, AACRAO distributed another survey instrument in 1978 designed to update its initial effort and to secure information about changes, if any, to the data originally submitted. The data gathered in these two surveys, together with the data from a 1960 survey, constitute the raw material upon which the 1979 publication is based. Survey findings, which comprise 30 pages, are reported in tabular form. While I am not an expert in survey design, I believe that the surveys were well-conceived and gathered information germane to the purpose of monitoring changes and documenting current records retention practices and procedures. The 1973 survey was sent to 1,800 AACRAO member institutions and 1,069 forms (approximately 60 percent) were returned and analyzed in 1974. The 1978 survey was sent to a sample of those who responded in 1974. Of the 318 institutions contacted, 272 questionnaires (approximately 85 percent) were returned and analyzed.

The colleges and universities surveyed reflect membership in AACRAO by all sizes and types of public, private, men’s, women’s, two-year, four-year, and graduate institutions. Institutions that responded to the 1960 survey administered the records for over 1,600,000 students, while the 1974 respondents had responsibility for the records of nearly 5,000,000 students.

Given the magnitude of these numbers, it should be clear that the 1979 AACRAO guide is of extraordinary importance. One suspects that a large percentage of college and university archivists are unaware of the AACRAO schedule’s existence, and consequently that the archival future of “their” student records has already been predetermined without their knowledge. In colleges where graduated students are the institution’s primary “product,” and in universities where research and graduated students are both primary products, it is likely that student records, together with faculty papers and administrative correspondence and subject files, form the core of archival holdings.

This being the case, can the archival future of student records be left in the hands of registrars and records managers? Are archival considerations met and respected by the AACRAO schedule? Was there any archival input in the development of these guidelines? What was the impact of the Buckley Amendment on the development of the schedule? What is the impact of the 1979 schedule on the retention and destruction of student records?

If archivists were not integrally involved in the development of *Retention of Records*, were archival concerns nonetheless considered and respected by AACRAO? The answer is yes. To begin with, the methodology of developing the AACRAO retention schedules,
summarized on pages 8 through 10, is sound. Retention schedules must meet "the academic, fiscal, legal, historical, and research requirements of the institution." AACRAO outlines the goals and objectives of retention guidelines, which in order to be effective, should: 1) save money, time, space, and staff, 2) insure that all legal requirements are met, 3) provide that information of administrative, research, and/or historical value is retained, 4) guarantee that all vital records are secure, and 5) assure that information in student records is readily available when students request access to it. The guide also enumerates five recommended stages for the development and implementation of the schedule, including: 1) the identification of need, 2) an inventory of records, 3) the appraisal and categorization of records, 4) the creation and implementation of a retention and disposal schedule, and 5) the review and modification of a program.

In stage three, appraisal and categorization, AACRAO outlines three basic categories: 1) records which can be destroyed immediately, 2) records which can be stored more efficiently prior to their disposal, and 3) records with lasting value which should be placed in an archives. Since these categories seem appropriate, let us consider appraisal standards. AACRAO suggests that records may have five possible values: academic, administrative, fiscal, legal, and historical or research. According to AACRAO, a record has "historical and research value if it contains information which may support analytical or research efforts. Among those considered in this group are enrollment records, demographic data, degrees awarded, and various statistical reports." Although this definition may be perhaps too simplistic, it draws upon the life cycle concept of records and attempts to incorporate the perspectives of operating units, records management, and archives into a single comprehensive statement.

Theory is put to the test in the retention schedules which follow. AACRAO retention recommendations are divided into five schedules according to the different types or categories of records created and used by admissions officers and registrars. In Schedule A, for the Admissions Documents of Applicants Who Do NOT Enter, the guide has an across-the-board recommendation to retain for three years and destroy, except where state or federal legislation mandates a longer retention. This seems reasonable if a three year period meets state standards. In Schedule B, for the Admissions Documents of Applicants Who Enter, the guide has an across-the-board recommendation to retain for five years and destroy. This seems rather short and, more importantly, is stated in a misleading manner. Note 1 on page 13 states that these forms should be maintained in individual folders for no longer than five years after the date of last attendance. This in effect means that admissions records are held, in most cases, for five to nine years.
There are two retention recommendations in Schedule B which could cause archivists concern. One is for medical records and the other is for letters of recommendation. Archivists will probably have greater difficulty with the latter. If Harvard University Archivist Harley Holden's appraisal standards were the criteria for judgment, then both of these record types would be kept permanently. In Holden's view, student records, and in particular letters of recommendation, comprise a gold mine of information for biographical, sociological, genealogical, and historical research. Research in student health records and the use of student records in longitudinal health studies are two powerful arguments for permanent retention. One, however, might justifiably question how many longitudinal health investigations America needs.

The debate over the use and disposition of letters of recommendation constitutes a battleground where administrative informational needs, efficient records management practices, privacy concerns, and archival preservation for research purposes clash head-on. Many archivists are interested in saving letters of recommendation, but operational costs and limited administrative needs argue for early destruction. Since admissions records are nearly always filed together, sound records management practice suggests their destruction after the summation and/or transfer of essential data from the admissions documents to the academic record and/or transcript files (in accordance with AACRAO standards). Privacy concerns also argue forcefully for the early destruction of such records as letters of recommendation. The Buckley Amendment places pressure on colleges and universities to protect against the disclosure of personal, confidential information. There is no question that personal privacy is best protected by the destruction of recorded information of this type.

Institutions, moreover, have themselves to protect. Since Buckley, as amended, states that letters of recommendation that are not accompanied by waivers and are retained beyond their intended use may be viewed by the student, AACRAO recommends that these letters be destroyed. Perhaps this is an over-reaction. Yet archivists, by suggesting these records be kept, are asking administrators and front-line operating personnel to confront serious procedural problems and expense for the sake of preserving records with merely potential research value. Archivists had best be very well prepared to argue persuasively on this question, since forcing the issue may end in defeat.

The privacy issue seems to be at least a three-edged sword. Federal privacy legislation requires that information collected for one purpose not be used for another purpose, thereby undercutting the archivist's concept of the multiple use of records. Consequently, the
retention of letters of recommendation for archival or research purposes must conform both to non-disclosure provisions and to specificity of purpose requirements during the lifetime of the student. Once the student is deceased, the specificity of purpose constraint is removed and access can be granted for alternative informational uses. Case law presently holds that after an individual dies, privacy rights end and are not devolved to heirs. Therefore, letters of recommendation necessarily have a long period of inaccessible dormancy before they can be used by researchers. The thorny problem remains: how does one reconcile the long-run interests of archivists with the short-run expense of registrars?

Let us examine the remaining AACRAO schedules. Schedule C, for Records and Registration Documents, applies to a diverse array of documents and record series. Retention periods range from one year to permanent. Permanent retention is awarded to academic records (including narrative evaluations), catalogs, change of grade forms, class lists, commencement programs, graduation lists, and schedules of classes. A five-year retention period is recommended for advanced placement records, applications for readmission, correspondence, curriculum change authorizations, financial aid documents, tuition and fee charges, the registrar’s copies of grade reports, and related series. AACRAO suggests only a one-year retention for applications for graduation and reentry, change of course forms, students’ class schedules, withdrawal authorizations, and requests for transcripts from students. Overall, the recommendations in Schedule C appear reasonable.

Records in Schedule D, for Certification and Statistical Documents, are retained for five years or permanently. These choices seem straightforward and uncontroversial. Permanency is awarded to such statistical reports or documents as degrees awarded, enrollment figures, grade reports, and racial/ethnic documentation. Schedule E pertains to Family Educational Rights and Privacy Act Documents. Student requests for the non-disclosure of directory information are to be kept one year. It is recommended that all other documents be retained for the life of the affected record or until terminated by the student, as in the case of waivers for rights of access. These retention periods, dictated by federal law, are not open to serious question.

Beyond serving as a disposal schedule, AACRAO’s Retention of Records is also a storehouse of survey data on actual record-keeping practices in colleges and universities. The two surveys (1974 and 1978) provide a before-and-after profile of the impact of the Buckley Amendment on colleges and universities. An interpretation of the data gathered in the two surveys reveals that public institutions destroy more than private institutions, large institutions destroy more than small institutions, all institutions are discarding more
material than before (either because a greater total volume is being created and/or because retention schedules are more selective), and the use of microfilm and magnetic storage is increasing. The 1978 survey included a follow-up questionnaire which produced some interesting results. Eighty percent of the respondents said that they actually destroy records at the conclusion of their stated retention periods, while 20 percent do not destroy anything despite having schedules.

In response to the question, "Are you now destroying records that you did not routinely destroy prior to the fall of 1973?", 35 percent replied affirmatively. This would seem to suggest that Buckley has had a substantial impact, but not nearly as significant an influence on records retention and destruction as archivists expected. Approximately two-thirds of the institutions surveyed are still doing things the way they did them before Buckley. What about the one-third that changed practices and procedures? One suspects that registrars and admissions officers are throwing away more records relating to those students who applied for admission but did not enter, and that this type of record is being destroyed much earlier than it previously had been. The other notable change involves letters of recommendation. Here there has been slightly less permanent retention, from 33 percent to 30 percent. Given the sample size and other validation criteria, this change may be statistically insignificant. It should therefore be clear that the Buckley Amendment did not significantly alter the percentage of colleges and universities that retain letters of recommendation permanently. Another trend worth noting is that those institutions that do discard letters of recommendation seem to be doing it sooner.

A comparison of the recommended retention periods in the 1960 schedule and those in the 1979 schedule shows that in every case the retentions are the same or longer in 1979. For this archivists should commend AACRAO. On the other hand, while it is clear that the Buckley Amendment did not change the world of student records very much and it is still too soon to evaluate the impact of the 1979 retention schedule, archivists should be aware that what really changed the world of student records significantly was the AACRAO retention schedule of 1960. Between 1960 and 1974 the percentage of institutions permanently retaining letters of recommendation dropped from 55 percent to 33 percent, while since the passage of Buckley, retention has only dropped from 33 percent to 30 percent. As a search of the SAA Archives in 1980 revealed, the Society exhibited little interest in AACRAO's 1960 publication. This regrettable neglect must not be repeated in the future.

New technology will have a considerable impact on the future administration of student records. As record systems become less
based upon hard copy, records managers and archivists will have more flexibility in weeding records and information in machine readable form. To be sure, retaining a hard reference copy on microfilm may always be necessary, but the selective disposal and/or destruction of records and information will be much easier. Although it will probably take ten to twenty years to transform this technological vision into operational reality, the potential is great. Archivists and AACRAO members, therefore, would do well to explore every means of cooperation. AACRAO’s 1979 guide serves as a perfect vehicle with which to initiate discussions at the national level and at our respective institutions.

FOOTNOTES


2. Commonly known as the Buckley Amendment to the Educational Amendments Act of 1974, the Family Educational Rights and Privacy Act became effective on November 19, 1974. The statute governs access to official records directly related to students and maintained by educational institutions.

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