

The Policy on Files

INTRODUCTION

Kenrick-Glennon Seminary has the responsibility for effectively supervising the release of information about its students. The offices and departments of the Seminary which collect and maintain personal information about students shall adhere to the following policies in regard to the release of information about students in the record and shall develop specific operating procedures which are consistent with these policies.

The policies and procedures which follow in no way impede or restrict the rights of the Ordinary of Saint Louis in the exercise of his responsibility for the seminary and for the evaluation of Seminarians for the Archdiocese of St. Louis.

Likewise, they do not impede or restrict the right of other Ordinaries and Religious Superiors in reference to the formation and evaluation of Seminarians for their respective Dioceses or Religious Communities.

For all College students, an emergency information sheet is maintained in the college office, in the Vice Rector's File and in the College vans. For the Kenrick students, emergency information is maintained in the Dean of Seminarians' office and in the Rector's File in the Administrative Assistant's office. Those files may be accessed by a member of the Administrative Team or in their absence, by any resident priest.

For purposes of these policies, a student of Kenrick-Glennon Seminary is

- an applicant who has made official application to attend Cardinal Glennon College or Kenrick School of Theology and has been accepted as a student and who is currently enrolled there for academic work;
- a former student who has attended in the past, but is not currently enrolled;

For all Cardinal Glennon College students, an emergency information sheet is maintained in the college office, the Vice Rector's file, and in the college vans. Those files are accessible to any resident priest and member of the Administrative Team.

For all Kenrick School of Theology Students, including Pre-theologians, an emergency information sheet is kept in the Dean of Seminarians' office and the Rector's file in his Administrative Assistant's office. Those files are accessible to any resident priest and member of the Administrative Team.

TYPES OF FILES MAINTAINED

Kenrick-Glennon Seminary maintains the following files on students which are in the custody of the Seminary:

FOR STUDENTS OF CARDINAL GLENNON COLLEGE *

Cardinal Glennon College maintains the following types of files for its students with the contents listed below.

After the admissions process is completed, all application materials which come as a packet from the Vocations Office are distributed among three types of files.

DOCUMENT FILE

For each collegian, there is a personal ("Document") file. The file is kept in the College office and is maintained by the Registrar, Administrative Assistant and Vice-Rector. The files contain:

- personal data
- family data
- photo
- educational history
- employment background
- ecclesial enrollment (parish)
- health form
- emergency information
- insurance information
- request for criminal record/background check completed
- recommendations from superiors/rectors if applicable
- canonical status
- payment/financial status
- physical exam
- HIV test and release form
- Immunization history

- Eye exam report
- Dental report
- Letter of recommendation from pastor
- Letter of recommendation from other(s)
- Letter of recommendation from employer
- Baptismal record
- Confirmation record

Those who have access to Document Files are the President-Rector, the Vice-Rector for Glennon College, Formation Advisors, the College Registrar and the Administrative Assistant to the Vice-Rector for Cardinal Glennon College.

[When a student withdraws or leaves Kenrick-Glennon upon graduation, the Document file is kept for three years. Those files are maintained by the College office staff.]

ACADEMIC FILE

For each collegian, there is an Academic file. The file is kept in the College office and is maintained by the Registrar. The files contain:

- high school transcripts
- college transcripts
- degree status forms
- copies of each semester's registration forms
- copies of each semester's report cards

They may be accessed by the President-Rector, the Vice Rector for Glennon College, the Registrar, Formation Advisors and the Academic Dean.

VICE-RECTOR'S FILE

The Vice Rector for Cardinal Glennon College maintains a file on each collegian. Those files are stored in his office. They contain:

- personal data
- family data
- emergency information
- insurance information

- Psychological evaluation
- release form of Application, Admission and Academic Records
- Legal Concerns form
- Authorization of release form
- Autobiographical essay
- Growth plans
- Peer evaluations
- Self-evaluations
- Evaluation letters to Bishops
- (withdrawal letter if applicable)

Those who have access to the Vice Rector's files are the President-Rector, Vice Rector for Cardinal Glennon College and Formation Advisors (including the coordinator of Human Formation Services).

PERMANENT FILES (TRANSCRIPT FILES)

Permanent files are created by the Administrative Assistant to the Vice Rector for Cardinal Glennon College three years after students withdraw from OR graduate from Glennon College AND do not continue as Kenrick seminarians. Those files contain only the final college transcript and are kept in the permanent file storage area. Access is restricted to President-Rector, Vice Rector for Cardinal Glennon College, the Academic Dean and the Registrar of Cardinal Glennon College.

NOTE: Final transcripts for students in the Cardinal Glennon College graduating classes from 1988-2008 are maintained by St. Louis University, College of Philosophy and Letters.

No copies of electronic files, if any are sent, are ever kept after a paper copy has been printed.

For All Students in the School of Theology including International Students Studying ESL at another Institution

FOR SEMINARIANS OF KENRICK SCHOOL OF THEOLOGY

Kenrick School of Theology maintains the following types of student files which are in the custody of the Seminary:

ADMISSIONS FILE

Until applications are completed for the Admissions Committee, the Personal files are the responsibility of and are maintained by the Administrative Assistant to the Dean of Seminarians and Vice-Rector for Formation. The file contains:

- personal data (pages 1-6 of the application)
- family data
- photo
- educational history
- employment background
- ecclesiastical enrollment
- health form
- emergency information
- insurance information
- confidentiality of information
- authorization & release form
- returned report for criminal background check from the agency doing the research and investigation. (The Original request for a background check is signed by the student and sent with a letter from the Vice Rector for Formation to the appropriate external agency. A copy of that request & letter is maintained in the personal file.)
- legal status
- Recommendation from rectors/superiors
- Canonical status
- Payment arrangements and financial status information
- Autobiographical essay
- Physical exam (completed by health care provider)
- HIV Test and Release information (completed by applicant and given to the examining physician)
- immunization history (completed by the health care provider)
- Written report from an ophthalmologist
- Written report from a dentist
- Psychological exam and reports completed by the health care provider
- Letters of recommendation from the applicant's pastor
- General letters from two other people (friend, employer, non-relative)

- Baptism record (dated within the previous six months) and confirmation record if not noted on the Baptismal record
- Copies of official transcripts with degrees (made by the registrar)

Those who have access to the Admissions File include the President-Rector, the Vice Rector for Formation, the Academic Dean, the Dean of Seminarians/Director of Human Formation and the Coordinator of Human Formation Services.

TEMPORARY ADMISSIONS FILES

Upon receipt of the applicant's information, the Administrative Assistant to the Vice-Rector for Formation makes copies of the following information creating temporary files for the Admissions Committee:

- personal data
- family data
- photo
- educational history
- employment background
- ecclesiastical enrollment
- autobiographical essay
- psychological report
- copies official transcripts
- special notes for admissions

After the admissions committee has met and conveyed their decision to the President- Rector, the temporary admissions files are destroyed by the committee member.

PRESIDENT-RECTOR'S FILE

Once the Admissions file is complete and the admissions process is completed, the Admissions file becomes the responsibility of and is maintained by the Administrative Assistant to the President-Rector. To the Admissions File are added:

- Psychological reports;
- Vocation Director's evaluation;
- Formation Advisor's Reports;
- President-Rector's reports;

- correspondence from the student's Ordinary or Vocation Director (e.g . , regarding advancement) and
- any other correspondence addressed to the Rector personally regarding that student.

This file is supervised by the President-Rector. It may be accessed by the President-Rector, Vice Rector for Formation, and Administrative Assistant to the Vice-Rector for Formation and Dean of Seminarians. Spiritual Directors may have access as needed with the consent of the student directee.

The Vocation Director's letter of recommendation would be available to the: President-Rector, Dean of Seminarians, Staff Psychologist and Formation Advisors for developmental and formational use with the student.

ACADEMIC FILE

For each seminarian, the School of Theology Registrar maintains an Academic file in his/her office. The file contains:

- personal data (pages 1-6 of the application)
- family data
- photo
- educational history
- employment background
- ecclesiastical enrollment
- Official Transcripts from all schools attended since high school
- the Academic Information Form;
- M.Div./M.A. Registration Form;
- V.A. enrollment certification forms where applicable;
- degree program progress reports;
- Rector's evaluations;
- signed statement releasing the student's grades to his Ordinary or Superior.

The Kenrick academic files may be accessed by the Registrar, the President-Rector, the Vice Rector for Formation, the Formation Advisors and the Academic Dean.

When a student withdraws from the School of Theology or does not get ordained upon graduation, the transcripts are placed in a file in the Registrar's custody.

VISA FILE

For each seminarian who is temporarily in the U.S. on an F-1 student visa, including those in residence, but studying off campus in a program for ESL, the Registrar of Kenrick School of Theology, who is also the Principle Designated School Official (PDSO) for the government Student and Exchange Visitor information System (SEVIS), maintains a VISA file.

Those files contain:

- a print out of the data sheet from their SEVIS file
- a copy of all signed I-20s
- a copy of the information page(s) of his current passport
- a copy of the visa
- a copy of the I-94 card
- documentation for application for Optional Practical Training (OPT)
- other information related to level of study, address change, etc.

A SEVIS Designated School Official (DSO) also has access to the visa file.

PERMANENT FILES

Once a student has withdrawn or graduated, the Administrative Assistant to the Vice-Rector and Dean of Seminarians seals in a pre-printed envelope

- the autobiography
- the last evaluation before ordination to Diaconate or Priesthood OR
- the last evaluation before withdrawal from Kenrick-Glennon Seminary.

The documents retained in the permanent file include:

- Application and photograph
- Baptismal and confirmation certificates
- Letter of acceptance
- Letters to Ordinary
- Evaluations for diaconate
- Evaluations for priesthood
- The last evaluation for those who leave before ordination
- Petitions

- Letters from Ordinary regarding petitions and call to orders
- Dimissorials
- Testimonials
- Profession of Faith
- Promise of Celibacy
- Rector's certification for diaconate
- Document from Church of baptism regarding diaconate
- Rector's certification for priesthood
- Document from Church of baptism regarding priesthood
- Consent to release form
- Matriculation blank
- Formation summary sheet - appendix
- Transcripts from former schools and standardized test results

The President-Rector's file is then given to the Registrar with the sealed envelope and documents listed above. Those files are maintained by the Registrar of Kenrick School of Theology. They may be accessed by the President-Rector, the Vice Rector for Formation, and the Academic Dean.

PERSONAL FILES

The following types of files maintained by individual administrators or faculty contain personal notes of progress and are therefore excluded by FERPA from regulations regarding disclosure:

DEAN OF SEMINARIANS' FILE

The Dean of Seminarians maintains a file for each current seminarian with the following documents in his office:

- first six pages of admissions list, application items A1-A6)
- autobiography (admissions list item B)
- copy of the psychological report
- personal formation agreements and final evaluation documents for every year

These files are shredded upon withdrawal or ordination.

PASTORAL FORMATION FILE

The Director of Pastoral Formation maintains a file for each current seminarian with the following documents in his office:

- verbatims,
- supervisor's evaluations;
- seminarians' evaluations.

These files are shredded upon withdrawal or ordination.

REGULATIONS AND PROCEDURES ON ACCESS TO FILES

FOR STUDENTS

STUDENT RIGHT OF ACCESS

Students will be given access to and may have released all file materials to which they have a legitimate right according to these guidelines. The following rights pertain to file access: they have the right to:

- be provided a list of the types of files maintained by the institution and which are directly related to the student, and those files to which the student has legitimate access
- inspect and review the content of those specified files to which the student has access within 45 days of the request
- a response from the supervisor of a given file to a reasonable request for explanations and interpretations
- appeal to the President-Rector concerning the content of those records

PROCEDURES FOR STUDENTS TO ACCESS FILE CONTENTS

A student may initiate access to the school files concerning himself either by directly contacting the given office where the file exists, or by contacting the Dean of Seminarians or Academic Dean who will assist the student in identifying the locations where files may be kept.

When the student appears at a given office and requests access to the school files about himself, the designated staff person(s) should review the contents of the record with the student. If this cannot be done immediately, an appointment should be arranged within 45 days.

The student should be free to make notes concerning the contents but NO COPIES of the material should be made. Also, no material should be reviewed by the student except in the presence of the responsible staff member. Furthermore, no material should be removed from the file at the time.

In the event that a student has challenged the accuracy of certain data/information and has requested deletion or modification of the record, the designated staff person(s) reviewing the file with the student may agree to delete selected information, and do so based on office practice only.

If the designated staff person does not concur with the student's request to delete or modify the information, an administrative hearing may be requested by the student. The hearing will be conducted within fifteen (15) working days after the student formally requests it.

A hearing, conducted under the direction of the President-Rector, shall provide for a written or oral presentation from the student in support of his request for deletion and/or modification. It also provides for other input in support of or in opposition to the deletion or modification.

The hearing officers shall provide the student, in writing, the decision concerning his request for deletion or modification, including the rationale for the decision.

FOR OTHERS (WITHOUT STUDENT CONSENT)

Without written consent of the student, the institution will permit access to (or the release of) education records or personally identifiable information of Seminarists to the following:

- Kenrick–Glennon Seminary officials and teachers who have legitimate educational interests
- Accrediting organizations in order to carry out their accrediting functions
- Government officials who have legitimate access by law.
- Persons legitimately involved with a student's application for or receipt of financial aid.
- Organizations conducting studies for educational agencies for the purpose of developing, validating, or administering predictive tests, administering student aid programs, and improving instruction, provided such studies are conducted in such a manner as will not permit the personal identification of the student involved.
- In compliance with judicial order, or pursuant to any lawfully issued subpoena, upon condition those students are notified previous to compliance.

RELEASE AND TRANSFER OF STUDENT INFORMATION

STUDENT INFORMATION NOT SUBJECT TO RELEASE AND TRANSFER

All materials, in any student file, that are not specified in the following sections A and B are not subject to release and transfer. Kenrick-Glennon Seminary never releases the following information:

- confidential letters and statements of recommendations which were placed in the records prior to January 1, 1975
- confidential recommendations for which a student has signed a waiver of right or access upon admission
- the financial records of students' parents or any information contained therein

It is the general policy of Kenrick-Glennon Seminary not to permit the release of any information contained in student files (other than directory information of Seminarians) without the written consent of the student

involved to any other party than those legitimately specified in these regulations. However, the institution will release information from education records to appropriate persons (including parents) in connection

with an emergency if the knowledge of such information is necessary to protect the health or safety of a student or other persons.

MATERIALS SUBJECT TO RELEASE AND TRANSFER WITHOUT WRITTEN CONSENT

DIRECTORY MATERIALS

Directory information "is defined as information contained in the education records of a student that would not generally be considered harmful or an invasion of privacy if disclosed...such as name, address, e-mail address, telephone listing, photograph, date and place of birth, major field of study, participation in officially recognized activities and sports, dates of attendance, degrees and awards received, the most recent previous educational institution attended, grade level or year, and enrollment status. Students have the right to restrict disclosure and the period of time within which a student has to notify the school that he does not want any or all of those types of information designated directory information."

(<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/students.html>)

Additional federal regulation of disclosure is specified in the FERPA Notification of Rights found in Appendix A of this Handbook.)

Directory information at Kenrick-Glennon Seminary is defined to include: the student's name, address, telephone listing, e-mail address, date and place of birth, home diocese or religious community which sponsors him at the seminary, home parish and pastor, participation in officially

recognized institutional activities, dates of attendance, degrees, awards, ministries and orders received, and the most recent previous educational agency or institution attended by the student.

MATERIALS SUBJECT TO RELEASE AND TRANSFER WITH WRITTEN CONSENT

Students may have released all file materials to which they have a legitimate right according to these guidelines (See section C below for exclusions).

Information about a student will be released to the parents only with the written permission of the student involved.

With written consent of the student, and in keeping with this policy, Kenrick-Glennon Seminary will release the educational records or personally identifiable information of a student to officials of other schools or school systems in which the student intends or seeks to enroll, and to any parties designated by the student.

FOR STUDENTS OF CARDINAL GLENNON COLLEGE

Copies of the following materials are subject to release and transfer at the written request of the student:

1. From the Academic File
 - transcript of Cardinal Glennon College
 - V.A. enrollment certification forms
 - degree program progress report
2. From the Vice Rector's File
 - the student's annual evaluation letter from the Vice Rector to the Ordinary

FOR STUDENTS OF KENRICK SCHOOL OF THEOLOGY

Copies of the following materials are subject to release and transfer at the written request of the student:

1. From the Academic File
 - transcript of Kenrick School of Theology
 - V.A. enrollment certification forms
2. From the President-Rector's File
 - the student's annual evaluation letter from the President-Rector to the Ordinary

PROCEDURES FOR STUDENT CONSENT TO RELEASE AND TRANSFER

CURRENTLY ENROLLED STUDENTS

Currently enrolled students may request transfer or release of file materials by signing a File Transfer Request Form (see Appendix) obtained from the Registrar, and by paying whatever fees are established for such transfers. The Registrar will forward the request to the responsible official. The request form contains a “consent to release agreement” that must be signed by the student before any records are released.

FORMERLY ENROLLED STUDENTS NO LONGER AT KENRICK-GLENNON SEMINARY

For formerly enrolled students no longer in attendance at Kenrick-Glennon Seminary, a letter from the student requesting the release of materials from files will ordinarily be accepted as “consent to release”. If the matter warrants, a signed “consent to release agreement” will be required.

Requests for release of records will be processed as rapidly as can be managed, but always within forty- five (45) days of the date of the signature on the “consent to release agreement”, or the equivalent.

The student will receive a copy of all materials released if he makes such a request.

Note: Kenrick School of Theology has the right to withhold transcripts for financial and administrative reasons (Kenrick School of Theology Catalog and Regulations for Administrative Probation).

FILE REVIEW, ELIMINATION, TRANSFER OF MATERIALS AND SECURITY

For current students, there are certain guidelines for file maintenance. The Academic File is reviewed under the supervision of the Academic Dean and Registrar at the end of each semester to make corrections, additions, or deletions.

FOR STUDENTS OF CARDINAL GLENNON COLLEGE

For students of Cardinal Glennon College no copies of electronic files, if any are sent, are ever kept after a paper copy has been printed.

FILES OF APPLICANTS NOT ACCEPTED TO THE COLLEGE

If a student is not accepted, personal data information is returned to the applicant and other data is not retained in the seminary files.

FILES OF APPLICANTS WHOSE ADMISSION IS DELAYED

In case of delayed acceptance, the file is maintained for three years and then handled as above.

FILES OF CGC GRADUATES WHO WITHDRAW

For students who withdraw from Cardinal Glennon College, the contents of the Vice Rector's files are kept two years and then destroyed. The Document and Academic files are kept for three years and then destroyed. They are maintained by the College office staff. They may be accessed by Vice Rector for Cardinal Glennon College.

FILES OF CGC GRADUATES WHO LEAVE KENRICK-GLENNON SEMINARY

For students who graduate from Cardinal Glennon College, but do not apply to Kenrick School of Theology, the contents of the Vice Rector's files are destroyed. The transcripts from the Academic File are kept permanently. The Document and Academic files are kept three years and then destroyed. Files are maintained by the College office staff. They may be accessed by Vice Rector for Cardinal Glennon College.

FILES OF CGC GRADUATES WHO APPLY TO KENRICK SCHOOL OF THEOLOGY

For students who graduate from Cardinal Glennon College and apply to Kenrick School of Theology, the contents of the Vice Rector's files that are transferred to the Kenrick Admissions Committee are:

- Psychological evaluation
- release form of Application, Admission and Academic Records
- Legal Concerns form
- Authorization of release form
- Autobiographical essay
- Evaluation letters to Bishops

The following contents are destroyed:

- personal data
- family data
- emergency information
- insurance information
- Growth plans
- Peer evaluations
- Self-evaluations

The Document and Academic files are transferred to the Kenrick School of Theology.

FILES OF STUDENTS OF KENRICK SCHOOL OF THEOLOGY WHO GRADUATE OR WITHDRAW

For students who graduate or withdraw from the Kenrick School of Theology, the Registrar periodically reviews Permanent files eliminating duplicate forms and non-essential documents.

For purpose of security, the Academic Transcript and Permanent File documents are microfilmed in duplicate (with the exception of the student evaluations which are not microfilmed). One copy is kept in the Seminary archives; another is kept in the Archdiocesan Archives. Use of this material is limited in the same fashion as the original files, although statistical data, without reference to personal identification, is available to the Vocation Office.

As stated above, all personal files of administrators or faculty are to be shredded by the person maintaining the file upon the withdrawal or graduation of seminarians.