INFORMATION PAPER April 17, 2020

SUBJECT: Electronic Transfer of Student Records During COVID-19

BACKGROUND: With limited access to physical records, schools need an option to send and obtain records electronically. The withdrawal and records requirements remain the same except documents may need to be provided electronically.

DISCUSSION: Any request for records must include a signed records request form which can be accepted via email. Registrars will continue as the point of contact for record requests for withdrawing students and receiving schools. Other school staff should also follow the guidance in the **Emailing Records to Non-DoDEA Recipients** section below when sending student records (e.g., transcripts, report cards, IEP, 504 plans, ELL plans) electronically.

Compiling Student Records

The registrar will save/print Aspen records such as report cards and transcripts to save as PDF files or scan documents maintained in the student file, if accessible. Records that are not maintained by the registrar (e.g., student health records, IEP, 504 plans, ELL Plans) can be requested electronically from the respective point of contact. If the signed copy of a record is not accessible, such as IEP, 504 plans or ELL plans, the unsigned Aspen records can be considered official records upon receipt from the record holder (e.g., SPED, ESOL teacher or counseling staff). For records that are not housed in Aspen (e.g., SST plan, ELL plan, discipline) the DoDEA staff member can write a brief memo to be included with the student records. In order to ensure PII is protected, emails being sent to DoDEA staff can be secured in Outlook by following these steps:

- 1. Outlook Encrypted Email (Desktop Version and VPN only)
 - a. Select the "Options" tab on the New Message window.
 - b. Click the "Encrypt" button with the Lock symbol.
 - c. Registrars can encrypt the initial request for records email sent to school staff to ensure replies with attachments will be encrypted.

Emailing Records to Non-DoDEA Recipients

Prior to emailing records to a recipient outside DoDEA, the sender should convert all files to password protected PDFs (see instructions below). The Office of the Registrar recommends developing a school-specific password to use for all files. Passwords should contain a minimum of 12 characters and include a lowercase and uppercase alphabetic character, a number, and a special character. The student records and password should not be sent in the same email. Registrars will send the receiving school two emails, the first email will contain the password protected student records as attachments and the second email will contain the password to access the files. The email subject line should not contain any PII including the student's complete name.

Password Protect PDF Instructions

- 1. Open Adobe Acrobat PDF file.
- 2. Under the "File" tab select the "Protect Using Password" option. If "Protect Using Password" is not available under the File tab, select "Tools" and under the "Protect and Standardize" category click on "Protect". Then select "Protect Using Password". (May vary based on installed version of Adobe Acrobat).
- 3. Select "Viewing" under the "Requires user to enter a password for:" section.
- 4. Enter the school-specific password and re-type password in section below to verify accuracy of the password.
- 5. Click the "Apply" button to complete password protect process.

Schools may also send records with DoD SAFE (https://safe.apps.mil/) through the Drop-off option on the site. DoD SAFE will prompt the sender to create a passphrase that will need to be sent to the recipient in a follow up email. The DoDEA sender will log in via their CAC, but the recipient does not require a CAC to access the files.

Providing Unofficial Records Electronically

Unofficial records can be provided electronically with a records release waiver signed by the parent/sponsor if the student is under the age of 18 or by the student if 18 years of age or older. The requestor must indicate the email address to which the records should be delivered. Currently, many institutions will accept an unsigned/unstamped/unsealed electronic record as a valid or official record. The DoDEA staff member should follow the guidance provided above in the **Emailing Records to Non-DoDEA Recipients** section when emailing records to ensure PII is protected. Records (e.g., transcripts or report cards) can be provided through this procedure without the need to redact PII.

NEXT STEPS: The processes outlined above can be used during the time that schools are closed to families and staff. Further guidance regarding sending student records electronically will be provided in an upcoming student records policy.

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