Subcommittee Updates
During March, the following elements have gone through an initial review by subcommittees:

Organizational & Leadership Subcommittee: 2.1 Administrative Officer & Faculty Appointments, 2.2 Dean’s Qualifications - The subcommittee is working to ensure that the Bylaws are consistent with practice and accurately describe appointment processes.

Academic & Learning Environments: 3.1 Resident Participation in Medical Student Education - All medical students have opportunities to rotate through clerkships in which residents are part of the teaching/supervision.

Faculty & Resources Subcommittee: 4.6 Responsibility for Medical School Policies - The subcommittee worked to ensure that the policies and procedures of approving medical school policies is consistent with practice.

Curricular Objectives & Content Subcommittee: 6.2 Required Clinical Experience, 6.4 Inpatient/Outpatient Experience - Required clinical experiences are clearly defined and the amount of inpatient and outpatient experiences is appropriate for the MD program at BCM.

Curriculum Management & Assessment Subcommittee: 8.2 Use of Medical Educational Program Objectives, 8.3 Curricular Design, Review, Revision/Content Monitoring - The subcommittee worked to ensure the Curriculum Committee procedures were updated. In addition, the subcommittee is working to provide ample evidence of curriculum review, revision, and content monitoring.

Medical Student Experience Subcommittee: 10.3 Polices Regarding Student Selection/Progress & their Dissemination, 10.4 Characteristics of Accepted Applicants, 10.5 Technical Standards - The subcommittee is working with the Admissions team to ensure appropriate evidence is gathered to document committee training and approval of admissions requirements. New SOM Technical Standards will be approved by appropriate committees and appropriately disseminated to medical students.

Institutional Student Analysis Subcommittee: The ISA subcommittee has completed surveying all medical student classes. They are now analyzing data and writing the ISA report to summarize key findings.

Elements of the Month
Element 11.5 Confidentiality of Student Educational Records
Element 11.6 Student Access to Educational Records

Element 11.5 states that at a medical school, medical student educational records are confidential and available only to those members of the faculty and administration with a need to know, unless released by the student or as otherwise governed by laws concerning confidentiality.

Element 11.6 states that a medical school has policies and procedures in place that permit a medical student to review and to challenge his or her educational records, including the Medical Student Performance Evaluation, if he or she considers the information contained therein to be inaccurate, misleading, or inappropriate.
Element 11.5 — Confidentiality of Student Educational Records

BCM and the Office of the Registrar make every effort to ensure that all information remains confidential in accordance with FERPA. Only school officials with a “legitimate educational interest,” as defined by FEPRA, will be permitted to access ACADEMIC Records in the custody of the Registrar’s Office.

What is FERPA?
The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

How does BCM define an “education record”?
In BCM’s Student Record policy an education record refers to any format (e.g., paper, electronic) that either identifies a student by name, or contains PII or other descriptive information that would allow a person to deduce the student’s identity (either alone or in combination with other publicly available information). For the purposes of this policy, Education Records fall into one of four categories: Academic, Admissions, Non-Academic, and Student Health.

1. **Academic Records** contain student PII related to fulfillment of curriculum and other academic requirements. Academic Records may be stored or maintained in any BCM school, academic program, or College business office (e.g., Registrar) as necessary to carry out the academic affairs of the school, program, or the institution. Examples of Academic Records include, but are not limited to (if applicable), original application form; undergraduate college record; the letter of acceptance; course enrollment; exams; test scores; grades; written evaluations; transcripts; Directory Information; and documentation indicating academic actions (e.g., promotion, probation).

2. **Admissions Records** are defined in the Admissions Records Policy (23.1.01).

3. **Non-Academic Records** contain non-academic student PII, such as may be required to enroll or maintain enrollment in a school or program (but is unrelated to academic performance); effectuate an institutional response on behalf of the school/program; or conduct College operations in support of the school or program. Non-Academic Records are maintained by the student’s school or program Custodian, or by a party or organization authorized to act on behalf of the school (e.g., Title IX Coordinator), as necessary to carry out the business affairs of the school, program, or the institution. Examples of Non-Academic Records include but are not limited to background check results; demographic information; database systems; financial aid records; Student Health Records; disciplinary records, such as may arise from an alleged violation of College policy and subsequent investigation or adjudication.

4. **Student Health Records** are Non-Academic Records that contain PII about a student’s past, present, or current health status (e.g., physical, psychological). Student Health Records include disability accommodation records; health immunization records; drug test results; copies of original student medical records, either; copies of fitness for duty evaluations; and summary reports generated by the Wellness Intervention Team. Student Health Records do not include physician’s letters or other documentation used to justify a short-term accommodation that may be provided by a School Dean or designee pursuant to the Professional and Respectful Learning Environment Policy (23.2.01).

To review the policies in full, please see here:
23.1.06—Student Records Policy
FERPA
Element 11.6 — Student Access to Educational Records

All permanent paper Academic Records are stored in the Office of the Registrar with limited access. Records are secured in locked rooms on the BCM campus, and the Office of the Registrar retains the key. Furthermore, BCM is a closed campus and College policy requires visitors to check in with security, and employee access to secure areas requires a BCM Identification Badge.

**How are Student Educational Records stored?**

The Office of the Registrar manages the physical storage and security of Academic Records. Each school and individual program maintains a subset of student records which may include copies of official records as well as forms and/or documents that pertain specifically to each school.

**How can a student access their Academic Educational Records and how long does it take?**

Students may examine their Academic Educational Records by making a written request to The Office of the Registrar. The Office of the Registrar at BCM will make the records available within 45 days after the day BCM receives a request for access. The records shall be examined in the office in which they are kept, under the observation of trained Office of the Registrar administrative personnel, and shall not be altered, destroyed, or carried away from the office by the student.

Student request form: [Request to Inspect and Review Educational Records Registrar’s Website](#)

**New Data Collection Instrument Now Available!**

The LCME updates the data collection instrument annually. The School of Medicine monitors the DCI to stay updated on any changes to LCME requirements. The latest DCI is the one that BCM will be “locked” into and will need to base it narratives from.

To review the DCI, please click here: [2021-2022 Data Collection Instrument](#)

**In our next LCME Newsletter ...**

In the May newsletter we will look at elements 9.4, 9.7 and 9.8, which look at assessments. You will also be provided with our monthly subcommittee updates and any other LCME information as it pertains to our upcoming site visit. For more information please visit our LCME website at [www.bcm.edu/lcme](http://www.bcm.edu/lcme).

**Resources**

- BCM Self-Study Website: [www.bcm.edu/lcme](http://www.bcm.edu/lcme)
- LCME: [https://lcme.org/](https://lcme.org/)
- SOM Student Handbook: [https://www.bcm.edu/education/schools/medical-school/md-program/student-handbook](https://www.bcm.edu/education/schools/medical-school/md-program/student-handbook)