SPECIAL EDUCATION RECORDS MANAGEMENT

Policy & Compliance Forms Packet

Alain Locke Charter School

School Year: 2026/2027
Special Education Records Custodian: Eboni Harris
Case Manager / 504 Coordinator: Eboni Harris
Principal: Patrick Love

Includes Special Education Records Management Policy and 8 Implementation Forms

- Form 1 - Special Education Records Access Log
- Form 2 - Special Education Records Release / Transfer Log
- Form 3 - Quarterly Special Education Records Compliance Audit
- Form 4 - Records Confidentiality & Management Training Acknowledgment
- Form 5 - Staff Training Sign-In Sheet
- Form 6 - Three-Day Draft Compliance Tracker
- Form 7 - Special Education Records Corrective Action Log
- Form 8 - Annual Special Education Records Management Certification

Special Education Records Management Policy

Policy Area: Special Education / Student Records

Applies To: Administrators, Case Manager/504 Coordinator, Special Education Teachers, Related Service Providers, School Nurse, Paraprofessionals, Records Custodian, and other authorized school personnel

Effective Date: ____________________

Review Cycle: Annually

Approved By: ______________________________

I. Purpose

Alain Locke Charter School is committed to maintaining special education and Section 504 student records in a secure, accurate, accessible, and legally compliant manner. This policy establishes schoolwide procedures governing the maintenance, confidentiality, access, release, transfer, retention, disposal, required notices, and required consents associated with special education and Section 504 records. It is intended to align school practices with applicable Chicago Public Schools policies and procedures, IDEA, Section 504, FERPA, the Illinois School Student Records Act, the Illinois Local Records Act, and other applicable requirements.

II. Scope

This policy applies to paper and electronic records concerning identification, evaluation, eligibility, placement, provision of services, implementation, monitoring, or review of special education or Section 504 services.

III. Records Custodian

The Principal shall identify a Special Education Records Custodian responsible for overseeing maintenance, security, organization, access, release, and proper disposition of special education records. The Records Custodian may be the Case Manager/504 Coordinator or another appropriately designated employee. The Principal retains overall responsibility for compliance.

IV. Maintenance and Organization

Physical records shall be stored in a secure designated location, protected from unauthorized access, organized so required documents can be readily located, and returned to secure storage after use. Electronic records maintained in CPS-authorized systems such as SSM, Aspen, and Service Capture shall receive the same confidentiality protections. Staff shall use authorized accounts, protect credentials, access only records needed for legitimate educational responsibilities, and avoid storing confidential records on unauthorized personal devices.

V. Confidentiality and Security

Special education records are confidential. Records shall not be disclosed to individuals without a legitimate educational or administrative interest unless written consent has been obtained or disclosure is otherwise permitted or required by law or CPS policy. Staff shall protect identifiable disability, evaluation, IEP/504, behavior, medical, and related-service information from unauthorized discussion, viewing, transmission, or disclosure.

VI. Access to Records

Parents/guardians and eligible students shall be provided access to educational records within applicable CPS and legal timelines. Requests shall be forwarded promptly to the Records Custodian. Authorized school personnel may access records only when they have a legitimate educational or administrative interest. Teachers and providers responsible for implementing an IEP or 504 Plan shall have access to information necessary to fulfill their responsibilities. Physical-file access shall be documented through an access log as required.

VII. Release and Transfer of Records

Records shall not be released to third parties without appropriate authorization unless disclosure is permitted without consent. The Records Custodian shall maintain documentation of disclosures and transfers, including the requester, records requested, authorization/legal basis, date released, records provided, staff member completing the release, and method of transmission. Records shall be transmitted securely.

VIII. Parent/Guardian Consents

The school shall obtain and maintain written parental consent whenever required by IDEA, Section 504, CPS procedures, or applicable law. This may include consent for initial evaluation, initial provision of special education services, reevaluation when required, release of educational records, outside-agency disclosures, and other actions requiring consent. Revocation, refusal, or withdrawal of consent shall be documented and addressed according to controlling procedures.

IX. Required Parent/Guardian Notices

The school shall maintain evidence that required notices were provided, including procedural safeguards, meeting notices, applicable prior written notices, three-school-day draft materials, IEP progress reports, NONI or Break in Service notices when applicable, related-service-log notices, and records retention/disposal notices. Draft materials considered by the IEP team shall be provided at least three school days before the meeting when required, unless applicable procedures allow a shorter timeline with appropriate written parent agreement.

X. Record Retention

Special education records shall be retained according to current CPS Student Records Management and Retention requirements and applicable law. Staff shall not independently shorten retention periods or dispose of official records because a student has transferred, graduated, withdrawn, or is no longer receiving services.

XI. Disposal and Destruction

Official records shall never be discarded, shredded, deleted, or destroyed solely at the discretion of school personnel. Records that have met retention requirements may be destroyed only after required notices, authorizations, Records Management procedures, and Local Records Commission approvals are satisfied and no litigation hold, audit, investigation, records request, complaint, due process matter, or other preservation obligation applies. Approved physical destruction shall use a confidential method such as secure shredding; approved electronic destruction shall use authorized procedures.

XII. Special Education File Audits

The Records Custodian or Case Manager shall conduct at least quarterly internal audits of active records. Audits shall review current plans, signed documents, evaluations, consents, parent notices, procedural safeguards, three-day draft documentation, progress reports, FBA/BIP documentation when applicable, service documentation, records access/release logs, and other required records. Identified deficiencies shall be corrected promptly and documented.

XIII. Staff Training

Staff responsible for creating, maintaining, accessing, implementing, or handling special education records shall receive annual training regarding confidentiality, CPS student-record requirements, physical and electronic security, access and release procedures, required consents/notices, retention, authorized disposal, and breach reporting. The school shall maintain agendas, materials, attendance documentation, and acknowledgments.

XIV. Public Availability

To demonstrate that this policy is written and publicized, the school shall make it reasonably accessible to stakeholders through the school website, parent/student handbook, staff handbook, main office, staff training, parent communication, or another documented publication method. The school shall retain evidence of publication and communication.

XV. Reporting Concerns or Breaches

Employees shall immediately notify the Principal and Records Custodian of unauthorized access or disclosure, missing records, accidental loss or destruction, inappropriate disposal, compromised electronic information, or another suspected confidentiality breach. Staff shall follow applicable CPS reporting and remediation procedures and shall not conceal or independently resolve a breach.

XVI. Annual Review and Compliance Monitoring

The Principal, Special Education Case Manager/504 Coordinator, and Records Custodian shall review this policy annually, considering changes in CPS guidance, federal or state law, compliance findings, internal audit results, and staff training needs.

XVII. Governing Authority

This policy is intended to operate consistently with current Chicago Board of Education student records policies, the CPS IDEA Procedural Manual and Section 504 procedures, FERPA, IDEA, Section 504, the Illinois School Student Records Act, the Illinois Local Records Act and Local Records Commission requirements, and other applicable requirements. If this school policy conflicts with subsequently issued controlling law or CPS policy, the controlling requirement governs.

Policy Acknowledgment

I acknowledge that I have received or been provided access to the Alain Locke Charter School Special Education Records Management Policy and understand my responsibility to maintain the confidentiality and security of student special education records.

FORM 1: Special Education Records Access Log

Purpose: Documents access to confidential physical special education and Section 504 student records.

Student Name: ____

Student ID: ____

Grade: ____

IEP / 504: ____

Date	Person Accessing	Position/Agency	Purpose	Records Reviewed	Time In	Time Out	Initials

Records Custodian Review

Reviewed By: ____

Review Date: ____

Concerns Identified:

____

____

Corrective Action Required:

____

____

FORM 2: Special Education Records Release / Transfer Log

Purpose: Documents disclosure, release, or transfer of special education and Section 504 records.

Student Name: ____

Student ID: ____

Grade: ____

IEP / 504: ____

Request Date	Requesting Person/Agency	Records Requested	Authorization / Legal Basis	Release Date	Records Released	Delivery Method	Initials

Authorization Verification

- [ ] Written parent/guardian consent obtained
- [ ] Eligible student consent obtained
- [ ] Transfer to receiving school
- [ ] School official with legitimate educational interest
- [ ] Disclosure otherwise permitted by law/CPS policy
- [ ] Court order/subpoena reviewed under required procedures
- [ ] Other authorized disclosure: __________________________

Consent/Authorization Located In:

- [ ] Physical file
- [ ] SSM
- [ ] Electronic student record
- [ ] Other: __________________________
-

Verified By: ____

Date: ____

FORM 3: Quarterly Special Education Records Compliance Audit

Student Name: ____
Student ID: ____
Grade: ____
Disability/504 Eligibility: ____
Case Manager: ____
Annual Review Due Date: ____
Evaluation/Reevaluation Due Date: ____
[ ] Quarter 1 [ ] Quarter 2 [ ] Quarter 3 [ ] Quarter 4

Audit Date: ____
Auditor: ____

A. Current IEP / 504 Documentation

- [ ] Current finalized IEP/504 Plan available
- [ ] Current plan present in authorized electronic system
- [ ] Current plan present in physical record
- [ ] Required signed cover sheets/signatures present
- [ ] Notice of Conference present
- [ ] Procedural Safeguards documentation present when required
- [ ] Prior Written Notice/applicable notice present
- [ ] Parent participation/contact attempts documented
- [ ] Required consents present
- [ ] Current placement/LRE documented
- [ ] Transportation documentation present when applicable

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

B. Evaluation / Reevaluation Records

- [ ] Consent present when required
- [ ] Assessment Planning documentation present
- [ ] Eligibility Determination documentation present
- [ ] Related-service assessment reports present
- [ ] Required signatures present
- [ ] Evaluation records available electronically
- [ ] Evaluation records maintained in physical file
- [ ] Evaluation/reevaluation timeline current

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

C. Three-School-Day Draft Documentation

- [ ] Draft documents provided at least three school days before meeting when required
- [ ] Date sent documented
- [ ] Delivery method documented
- [ ] Evidence of delivery maintained
- [ ] SSM documentation reflects distribution
- [ ] Written parent agreement maintained when shorter timeline applies

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

D. IEP Goal Progress Monitoring

- [ ] Baseline data available
- [ ] Progress-monitoring data maintained for each applicable goal
- [ ] Measurement method matches IEP
- [ ] Frequency matches IEP
- [ ] Progress reports completed
- [ ] Progress reports provided to parent/guardian
- [ ] Data sufficient to determine progress
- [ ] Instruction/intervention changes documented when needed

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

E. Consultation / Collaboration Services

- [ ] IEP/504 consultation requirements identified
- [ ] Required provider(s) identified
- [ ] Subject/content area aligns to plan
- [ ] Required frequency/minutes documented
- [ ] Consultation logs current
- [ ] Documentation reflects student-specific support
- [ ] Missed consultation has follow-up documentation

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

F. FBA / BIP Documentation

- [ ] Current FBA present when applicable
- [ ] Current BIP present when applicable
- [ ] Required parent consent maintained
- [ ] Behavior data maintained
- [ ] BIP implementation documented
- [ ] Required reviews/revisions documented

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

G. Related Services

- [ ] Service requirements match IEP
- [ ] Provider schedules support required minutes
- [ ] Service Capture entries current
- [ ] Progress documentation maintained
- [ ] Missed/interrupted services monitored
- [ ] NONI/Break in Service present when required
- [ ] Related-service-log notice documented

[ ] Compliant [ ] Correction Needed [ ] Not Applicable

Notes: ____

H. SECA / Personal Care Documentation

- [ ] Personal Care identified when applicable
- [ ] Assigned SECA has necessary access
- [ ] Personal Care documented in Service Capture when required

- [ ] Digital signature requirements current
- [ ] Required training/documentation current

[ ] Compliant   [ ] Correction Needed   [ ] Not Applicable

Notes: ____

I. Medical / Chronic Condition Documentation

- [ ] Diabetes/seizure status reviewed when applicable
- [ ] DCA/SzDCA offer documented
- [ ] Parent response documented
- [ ] Assigned aide identified
- [ ] Required annual training maintained
- [ ] Bloodborne Pathogen/PPE training maintained
- [ ] Relevant SSM documentation current

[ ] Compliant   [ ] Correction Needed   [ ] Not Applicable

Notes: ____

J. Record Security and Confidentiality

- [ ] Active physical special education record maintained
- [ ] File stored in designated secure location
- [ ] File returned to secure storage after use
- [ ] Records Access Log present
- [ ] Records Release/Transfer Log maintained
- [ ] No confidential records stored in unsecured areas
- [ ] Electronic access uses authorized systems
- [ ] No unauthorized duplicate records identified

[ ] Compliant   [ ] Correction Needed   [ ] Not Applicable

Notes: ____

Quarterly Audit Summary

Total Areas Reviewed: ____

Areas Fully Compliant: ____

Areas Requiring Correction: ____

[ ] Fully Compliant   [ ] Minor Corrective Action Required   [ ] Immediate Corrective Action Required

Finding	Required Correction	Responsible Person	Due Date	Date Corrected	Verified By

Case Manager/Records Custodian Signature: ____

Date: ____

FORM 4: Records Confidentiality & Management Training Acknowledgment

School Year: ____

Training Date: ____

Trainer: ____

Training Topics

- FERPA and student-record confidentiality
- CPS student records requirements
- Special education and Section 504 records
- Appropriate physical/electronic access
- Legitimate educational interest
- Physical file and electronic security
- SSM/Aspen access expectations
- Records access and release/transfer logs
- Required consents and notices
- Three-school-day draft documentation
- Records retention and authorized disposal
- Reporting lost, compromised, or improperly disclosed records

Staff Acknowledgment

I acknowledge that I have received training regarding the confidentiality, maintenance, access, release, retention, and security of special education and Section 504 student records. I understand that student records are confidential; I may access them only for legitimate educational or administrative reasons; I may not share information with unauthorized individuals; I must secure records in my possession; I may not destroy official records without authorization; I must use approved systems; and I must immediately report suspected unauthorized access, loss, disclosure, or destruction.

FORM 6: Three-Day Draft Compliance Tracker

Schoolwide IEP / Evaluation / 504 Meeting Monitoring

Student	Meeting Type	Meeting Date	Draft Due Date	Draft Sent Date	Delivery Method	Evidence in SSM	Parent Agreement if Late	Compliant

Reviewed By: ____

Review Date: ____

Compliance Rate: ____

Corrective Actions Needed:

____

____

FORM 7: Special Education Records Corrective Action Log

Use when an internal audit identifies missing, incomplete, late, or improperly maintained documentation.

Student/Area	Compliance Concern	Date Identified	Required Action	Responsible Staff	Deadline	Completion Date	Verification

Follow-Up Review

- [ ] All identified deficiencies corrected
- [ ] Additional follow-up required
- [ ] Staff retraining required
- [ ] Administrative review required

Reviewed By: ____

Date: ____

Comments:

____

____

FORM 8: Annual Special Education Records Management Certification

School Year: ____

The undersigned certify that Alain Locke Charter School has reviewed its systems related to:

- [ ] Maintenance of special education and Section 504 records
- [ ] Secure storage of physical records
- [ ] Authorized electronic access
- [ ] Records access logs
- [ ] Records release/transfer logs
- [ ] Required parent notices
- [ ] Required parental consents
- [ ] Three-day draft documentation
- [ ] IEP/evaluation documentation
- [ ] Records retention
- [ ] Records disposal procedures
- [ ] Confidentiality training
- [ ] Quarterly file audits
- [ ] Corrective actions identified through internal monitoring

Annual Findings

Number of Active IEP Records Reviewed: ____

Number of Active 504 Records Reviewed: ____

Percentage Meeting Internal Compliance Standard:

____

Outstanding Corrective Actions:

____

____

Certification

Special Education Records Custodian Signature / Date:

____

Case Manager / 504 Coordinator Signature / Date: ____

Principal Signature / Date: ____