

Gradalis Waldorf Consulting & Services, LLC

STANDARD II-A, B, C, D— GOVERNANCE & MANAGEMENT

GENERAL PURPOSE

GRADALIS shall be capably and responsibly managed. The purpose of this Standard’s policies is to establish guidelines for developing governance and management goals and objectives, making administrative and governance decisions, setting policies, establishing processes, reporting progress on planning goals of GRADALIS Waldorf Consulting & Services, LLC (“GRADALIS”).

GRADALIS shall have a clearly identified and accountable governance structure which delineates authority for approval of its policies and delineates responsibility for the overall direction and effectiveness of its educational programs and consulting services. GRADALIS management structure shall ensure the integrity and capability of its organization and its compliance with statutory, regulatory and accreditation requirements.

RATIONALE

Governance and Management Policies will address: GRADALIS Interactive Distance Learning (“IDL”) Policies within the context of face-to-face teacher training; daily operations of GRADALIS; Human Resource Management; and, processes including recruitment, hiring and orientation of new hires.

GRADALIS Governance and Management Policies shall provide clarity of processes and systems for employee supervision, evaluation and professional development—Employee & Operations Handbook. Records policies, retention, and record keeping systems are to be included in this Policy to provide clear processes, including student and employee rights to records and confidentiality.

II-A GOVERNANCE

The GRADALIS Board of Stewards shall manage Interactive Distance Learning (“IDL”) to guide the establishment, organization, management, funding, implementation and maintenance of ‘grade-specific’ Waldorf programs. GRADALIS will recruit highly-qualified, experienced Waldorf educators to design, develop and deliver the highest quality interactive courses possible – i.e., Webinars. GRADALIS will review and regularly update its IDL/Webinars to ensure ‘working-teacher-training’ is performed in highly interactive events.

It shall be incumbent upon GRADALIS to deliver its IDL/Webinars through a ‘best-of-breed’ user-friendly platform (e.g., “ZOOM”) utilizing high quality, cost-effective technology. Management follow-through will obligate GRADALIS instructors to design topline, aesthetically beautiful, visual webinars to support working Waldorf teachers in each of their upcoming main lesson content.

GRADALIS will work to reinforce the types of artwork and lessons to be delivered in the Waldorf classroom. Instructors delivering Webinars are to be trained in the technology and expectations set forth with strategies to keep IDL students engaged. All Webinars are recorded and reviewed by the Executive Director and select Stewards. Students are required to maintain Webinar notebooks, routinely critiqued by the Board of Stewards. Periodic drop-ins by the Executive Director and the Department Chair/s will afford review, comment and critique of both students and instructors. Feedback and needed revisions shall occur to ensure timeliness and effectiveness of IDL program.

GRADALIS shall strive to continually secure its position in Waldorf Teacher Training marketplace via computerized Interactive Distance Learning with unique approach to Waldorf-inspired Webinars as a newly-created, exciting interactive communication system. This GRADALIS tool is necessary to allow it to remotely update, manage and control this network of Grade-Level Instructors internet connected personal computers. Executive Director (Grade-level areas) and the ECE (Early Childhood Education) Department Chair will upgrade (as appropriate) Webinar presentations, transfer files, or reconfigure operations from a central location, totally transparent to the site instructor/personnel. Additionally, GRADALIS administration shall have the ability to take over the remote user's display, mouse, and keyboard to determine problems or to show inexperienced operators how to use the system.

This IDL/Webinars shall be routinely accomplished as a matter of course to assure IDL/Webinars are capably, responsibly managed. Furthermore, to this end, organizational infrastructure shall be set in place for GRADALIS which involve outside legal counsel, a certified public accountant and a bookkeeper-enrolled agent. Senior management shall confer with these resources as necessary and appropriate.

II-B INSTITUTIONAL MANAGEMENT POLICY

Organizationally, GRADALIS shall develop and effectively implement policies within a framework that clearly defines and provides an effective understanding amongst and between all interested and involved individuals, educators, interested parties and organizations what GRADALIS brings to the Waldorf educational marketplace. To this end, GRADALIS shall establish, implement, review and regularly update written policies and procedures to guide its day-to-day operations and educational activities/events.

GRADALIS shall with transparency initiate and uphold clear delineation of relationships in an “Employee & Operations Handbook” continuously well-communicated protocols and frameworks (new and revised), secure critical feedback upon which to base improvements, all the while assuring implementation of GRADALIS written policies and procedures.

II-C HUMAN RESOURCE MANAGEMENT POLICIES

The GRADALIS Board of Stewards through its Executive Director – i.e., GRADALIS Senior Management – shall develop and implement written human resource policies and procedures. The sum and substance of these “HR Policies & Procedures” ensures recruitment of qualified and capable educational instructors, at appropriate staffing levels – i.e., availability – are effectively utilized and annually evaluated. GRADALIS shall document in its “Employee Handbook – PERSONNEL POLICIES” inclusive of policies, processes and procedures inclusive of recruitment, selection, hiring, orientation, supervision, evaluation, retention, training and professional development. (NOTE: *these are reflective of Standard VI – Qualifications and Supervision of Instructional Personnel*).

II-C-1 Recruitment, Selection, Hiring, & Orientation

GRADALIS shall establish, implement and periodically review policies and procedures for recruitment, selection, hiring and orientation of new personnel, i.e., educational instructors.

II-C-1-a RECRUITMENT OF PERSONNEL

Instructional personnel shall possess the appropriate combination of relevant educational credentials, specialized training and/or certification, work experience, and demonstrated teaching and classroom management skills, which qualified them for their training assignments. Instructional personnel shall meet all relevant accreditation, federal, state and/or industry-specific requirements. The Stewards of GRADALIS shall oversee the hiring of all faculty and staff. The Director of Education shall be primarily responsible for monitoring this process. Often, GRADALIS Stewards and faculty may reach out to qualified master teachers concerning their interest in working with GRADALIS as an instructor. Such hires are brought before the Stewards for review, interview and hiring approval.

II-C-1-b SELECTION OF PERSONNEL-QUALIFICATIONS OF INSTRUCTIONAL PERSONNEL POLICY

GRADALIS instructional personnel shall possess the appropriate combination of relevant educational credentials, specialized training and/or certification, work experience, and demonstrated teaching and classroom management skills, which qualified them for their training assignments. Instructional personnel shall meet all relevant accreditation, federal, state and/or industry-specific requirements. GRADALIS shall ensure that quality instructors, under professional and capable direction, effectively deliver educational and training services.

GRADALIS instructors shall be selected based on relevant years of training and experience as Waldorf educators. This common experience and training of instructors shall help to ensure GRADALIS courses will provide a consistent educational experience, both across semesters and when multiple instructors teach within one course. GRADALIS instructors shall be highly qualified teachers who have taught in Waldorf schools for many years and are respected as mentors and consultants in the field. GRADALIS instructors shall have college degrees and shall be Waldorf trained in respected institutions. In rare cases, GRADALIS instructors may be hired if the years of successful Waldorf teaching experience are so extensive it outweighs the lack of a degree. GRADALIS instructional staff shall have been instrumental in the development of Waldorf schools as faculty, College Chairs, founders and administrators with at least ten (10) years teacher mentoring experience in Waldorf public and/or private schools. Because teaching students who are actively working in public and private Waldorf schools, it shall be important GRADALIS instructors be knowledgeable about the workings of Waldorf schools—the challenges and rewards of Waldorf teaching in Waldorf school environments. The qualifications of GRADALIS instructors shall be posted in the Candidate-Teacher Catalog. GRADALIS shall be an Avocational Institution and thereby is not subject to State Licensing Requirements.

II-C-1-c HIRING OF INSTRUCTORS

As GRADALIS moves into the future, the following hiring protocol may be put in place:

Steps in the Hiring Process shall be as follows:

1. Posting of notice of hiring for GRADALIS
2. Review applications/letters of intent
3. Based on qualifications and experience (see job description for each position), applicants will be considered and placed on the interview list
4. Applicant will be interviewed by representatives from the GRADALIS Stewards
5. Selection will be based on the recommendations of the Executive Director and the interview team
6. Final Hiring will be decided by a consensus of the GRADALIS Stewards

II-C-1-d GRADALIS TERMINATION PROTOCOL

It is always difficult to terminate a teacher and/or staff member. Therefore, a careful process will be followed to provide for fair and balanced decision-making with regards to termination of an employee.

One or more of the following conditions must exist for termination of an employee to take place:

1. Budget Restrictions
 - a. In some cases, cuts may be made due to budget restrictions and changes in demand. Such recommendations by the Directors of Education and/or the Director of Administration shall be put before the Stewards for their approval with a presentation of the case for dismissal/layoff.
2. Dereliction of Duty—not fulfilling the job description
 - a. This must be gross dereliction of duty or repeated situations where this behavior has caused a lack of professionalism that negatively reflects on GRADALIS

3. Repeated Unprofessional Behavior
 - a. Inappropriate language and/or stories/jokes etc. while teaching
 - b. Talking/undermining colleagues
 - c. Repeating things about a student or colleague that could hurt and harm someone within GRADALIS and should be kept confidential and respectful of privacy laws
4. Quality of Work is continually sub-standard. Does not meet the expectations of GRADALIS teachers based on the rubric for Excellent Teaching & Instruction.
 - a. If even after a professional improvement plan has been instituted and sufficient time given for improvement to take place, the teacher still does not meet the expectations for instruction
5. Continued disrespectful behavior to students and/or colleagues that negatively reflects on GRADALIS
6. Termination of an employee must be for reasons that are accurately portrayed as one of the above reasons.
 - a. Such reasons must be presented to the Stewards and a conversation with the employee instituted prior to dismissal to assure fairness is being levied in cases of termination
 - b. A recommendation by the GRADALIS Director of Education is presented to the Stewards with causes included along with actual proof
 - c. Termination will be issued by the Director of Education based upon the consensus of the GRADALIS Board of Stewards

II-C-1-e INSTRUCTOR ORIENTATION & TRAINING POLICIES

GRADALIS shall develop and implement written policy for the effective orientation and training of instructional personnel to ensure a consistent, high level of instruction. Regular and relevant in-service training and/or professional development of instructional personnel shall be conducted and documented.

GRADALIS instructors and employees shall be welcomed by the Executive Director and shall be given an orientation that includes all aspects of the job description the new employee has been hired to perform. On-going support shall be given by the Executive Director and/or the Department Chair to assure the new employee can be successful in his/her position. Further training necessary to perform the job at high levels shall be given at the beginning and throughout the first months of employment with GRADALIS. As colleagues shall be selected for their expertise in Waldorf education, an approach that includes support and patience shall be administered in training and orienting new staff and instructors. Written documents giving step-by-step instructions needed to reach independence shall be provided by the Executive Director or a designee.

II-C-1-f ORIENTING & TRAINING INSTRUCTIONAL PERSONNEL

New employees shall receive an orientation from the Executive Director, including, but not limited to the following:

1. Employee signature on the Employee Engagement Letter indicating acceptance of duties & employee status
2. Signed acknowledgement of receipt of Employee Handbook and agreement and understanding of policies & procedures of GRADALIS
3. Confidential Emergency Form—fill out and sign
4. Job Description and Expectations of the job
5. Explanation of At-will relationship
6. FERPA laws explaining candidate privacy policies
7. Set up orientation for technology used in the program and for this employee's duties
8. Receipt of Annual Calendar and requirements to meet the responsibilities of the job

9. Determination of hiring status
 - a. Employee status—those instructors who deliver GRADALIS mentoring and instruction on a regular basis whether it be summers only or throughout the year
 - b. Independent Contractor status—e.g. instructors invited to teach who have developed their own curriculum and are known to teach this curriculum around the country or at other schools.
10. Signing of 1099, W-4 or W-9 and I-9s upon hiring depending on status
11. Explanation of payroll, reimbursement and communications policies
12. Assign employee supervisor
13. Explain annual employee evaluation process
14. Fill out and sign the Employee Emergency Information Form
15. Invitation to join our Business Services and Consulting Department if applicable
16. Training in job responsibilities, uses of technology employed by GRADALIS and details of “How to Do the Job”
17. Sharing of all documents to support the requirements of the position
18. Technology training in use of Taskstream for grading and access to course and student work
19. Technology training in how to create webinars and manage zoom technology if applicable

II-C-2 Supervision, Evaluation, Retention & Professional Development

GRADALIS shall establish, implement and periodically review policies and procedures for supervision, evaluation, retention, training and professional growth and development of all personnel, i.e., educational instructors.

II-C-2-a SUPERVISION OF INSTRUCTION POLICIES

Instructional personnel shall possess the appropriate combination of relevant educational credentials, specialized training and/or certification, work experience, and demonstrated teaching and classroom management skills, which qualified them for their training assignments. Instructional personnel shall meet all relevant accreditation, federal, state and/or industry-specific requirements. It shall be the task of the Hiring Team to ensure GRADALIS instructors are of the quality to ensure excellence in teaching and working with students to further the program goals and student learning outcomes are achieved. To that end, GRADALIS Stewards shall follow these protocols for Hiring, Supervision & Evaluating Instructors: GRADALIS instruction shall be supervised by qualified Waldorf educators who are also Stewards of the institution. The Stewards shall be primarily responsible for the quality of the training and instruction of GRADALIS programs and professional development. The Executive Director shall oversee the processes and procedures in place for instructor evaluation and shall develop the evaluation process, forms and rubrics for approval by the Board of Stewards. All instructors shall be evaluated one time per year and shall be reviewed by the Board of Steward by March of each year to determine renewal status. Instructors who are not being renewed shall be informed by March 31st if they will be continuing with GRADALIS or will not be renewed.

II-C-2-b SUPERVISION of INSTRUCTION (INCLUDING CLASSROOMS)

RATIONALE:

The importance of formative evaluations shall not be merely to assess a teacher’s performance, but to enhance the entire faculty’s ability to develop a quality of teaching that shall be continuously striving toward greater inclusiveness and effectiveness in student learning processes and outcomes. Teacher development and student learning shall be an inseparable dynamic. Although we shall stress this principle in training Waldorf Educators, we could all too easily take this point for granted in our own endeavors as higher education teachers. In, *Study of Man*, Steiner states that, “You can only become good teachers and educators if you pay attention not merely to what you do, but also to what you are” (1996, p.43). In this respect, teacher development shall be inseparable from inner development.

GOALS

Goals: There shall be two areas GRADALIS will be mindful of in setting out to improve its teaching. One shall be to access our creativity from the wellspring of our own inner life, and the other to turn toward our “community of fellow teachers from whom we can learn more about ourselves and our craft”. GRADALIS shall advocate an “open-door” method of peer evaluation based on multiple classroom observations and collegial conversation, as well as reflection that engenders a communal interest in the effectiveness the faculty as a whole shall have on student learning.

Individuals with relevant education and experience in instructional delivery and management shall supervise instructional personnel. Supervisors of instructional personnel shall demonstrate good practice in the evaluation and direction of instructors. Regular classroom observations shall be conducted at least annually by qualified supervisors and, along with student and supervisory feedback, are documented and effectively utilized to enhance the quality of instruction. Thereby, GRADALIS Stewards shall take up this evaluation task annually. They shall visit classrooms of instructors periodically to continue to be informed concerning the quality of instruction being provided in the training. The evaluation forms and process shall support high quality instruction.

The Faculty Evaluation Process shall be as follows:

- A. Self-Evaluation
- B. Faculty shall fill out the Teacher Self Evaluation form based on reflections of their own teaching based on the rubric provided by GRADALIS
- C. Professional Goals shall be put in place by June 1st for the coming academic year—beginning mid-summer each year with the Summer Intensive
- D. Peer visits, observations and feedback
 - a. All faculty shall visit at least one other faculty member teaching their class and give feedback to the teacher based on their observations
 - b. Such observations shall be preceded by a conversation between the peer mentor and the teacher.
 - c. The peer mentor shall seek area(s) the teacher wishes to be observed for feedback
 - d. During a post-conversation, the peer mentor & teacher shall share their observations of the lesson as well as share any additional feedback that might be helpful to the teacher in improving their craft
 - e. A short report shall be shared with the Department Chair regarding the strengths and areas for improvement determined by the peer mentoring team (teacher & mentor)
- E. Faculty Mentoring shall be established to provide support and growth for each member of the faculty
 - a. Each faculty member will be paired with another for purposes of mentoring in an area of needed/requested growth
 - b. If mentoring is not sufficient to improve the quality of instruction of the teacher, then a Professional Improvement Plan shall be put in place by the Director of Education and/or his/her designee
- F. Survey results as means of gaining information on strengths and areas needing improvement
 - a. An anonymous Student Survey shall be given annually to assess student and/or school satisfaction with the GRADALIS Program
 - b. The survey shall include questions about the quality of the program, organization, leadership, content, and other issues that make a great program
 - c. Survey results shall be compiled and presented to students, as well as used for improvement and strategic planning purposes
 - d. Faculty Input

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- e. An anonymous annual Faculty Survey shall be given to assess faculty satisfaction with the GRADALIS program and gather employee input on GRADALIS practices and conditions
 - f. Time during faculty meetings shall be provided to allow for sharing and input from faculty members
 - g. Faculty shall be included in an annual review of the curriculum and program to allow for new ideas and innovation
 - h. Faculty shall be asked to attend one another's lessons and shall be asked to provide reflections on teaching within GRADALIS through surveys and conversations at faculty meetings
- G. Final Evaluation
- a. The Executive Director or his/her designee shall present the final evaluation to the faculty member in a conversation
 - b. Evaluation shall be shared in the Teacher Evaluation Rubric and shall be based upon the following system:
 1. Does not meet the expectations
 2. Is developing toward the expectations
 3. Meets expectations
 4. Exceeds the expectations
 - c. Based upon the results of the evaluation process, a faculty member will be in one of the following categories:
 1. On-going faculty membership with commendations
 2. On-going faculty membership with suggestions for improvement
 3. Non-renewal of faculty member

The teacher shall be able to respond to the final evaluation in writing. Such documentation shall be kept in the employee's personnel file and considered by the GRADALIS Board of Stewards.

FUTURE POSSIBILITIES

As GRADALIS grows its faculty in numbers and quality, it shall be GRADALIS' aim to establish and maintain an evaluation process that builds a "community of truth." GRADALIS cannot assume that it has such a community, only that it openly aspires to continually be working to establish and maintain one.

To this end, GRADALIS shall take procedural steps that ought be followed:

- Faculty members will be grouped into teams of three or four with the common task to observe each other teach 3 times per academic year (beginning, middle, & end of the academic year). Having more than one observer would assure we gain a wider perspective than a single eye.
- Each member is responsible to share their observations with the observed faculty member and possibly in team meetings following observations.
- The format for observation notes should reflect the evaluation areas, such as level of commitment & interest in teaching the course, level of knowledge in the subject matter, competency in engendering student involvement and learning, capacity in organizing and adapting material to meet needs of students, capacity to learn from mistakes, and level of interest in students views and processes.
- Set up a rhythm of faculty meetings that devote portions of time for sharing classroom observations. Ground rules for dialogue will be determined by faculty agreement. GRADALIS will keep a style of "Appreciative Inquiry" in this dialogue. Not giving advice, but asking for advice will be the code of ethics to abide by.
- The complete teacher evaluation is comprised of a "360," which involves 5 sources of feedback: 1.) Fellow faculty, 2.) Students, 3.) Administrators and/or Staff, 4.) Supervisor, 5.) Self. Each

evaluative form will be designed specifically to meet the context in which the faculty member is typically perceived by the evaluator.

- Each faculty member will create a yearly professional development plan with the Director of Education. These plans will be reviewed yearly as a part of the overall faculty evaluation.

Note of Encouragement: As students of spiritual science GRADALIS participants must not forget how important it is to invite the spiritual world into our midst, for they are always assessing us. To make this more conscious is essential to the GRADALIS enterprise. *Assessment* comes from the Latin *assidere*, which implies “to sit beside.” GRADALIS imagines when observations are shared there sits beside us an Archangel. This imagination can conjure up the idea of true team learning, working together, building an organ of perception while at the same time building a community of mentors, coaches and teachers who consult with one another for the greater good.

II-C-2-c RETENTION OF INSTRUCTORS

GRADALIS values its instructors and shall make every effort to retain its faculty and staff. Should there be a need to terminate an instructor, GRADALIS shall follow the Termination Protocol above.

II-C-2-d ONGOING PROFESSIONAL DEVELOPMENT OF INSTRUCTORS

GRADALIS shall encourage its instructors and administrators to grow and improve professionally. Therefore, it shall provide professional development in areas that shall benefit them in fulfilling their job requirements. GRADALIS shall encourage attendance at external workshops, seminars, and/or conferences to ensure they stay current in their field with regard to content, teaching-theory and methodology within the industry/profession.

GRADALIS shall cover certain approved instances of professional development for its employees if financially possible. This might include seminars, workshops, on-line training, conferences and/or local classes. Employees shall request in writing to the Executive Director approval for professional development related to their job responsibilities to ensure continued improvement and professional growth. The Stewards shall determine whether such requests can be covered based on available monies budgeted for such training and professional need. An employee may write a Request Letter to the Stewards stating the requested training, dollar amount, including cost of the training, location of training, accommodations and travel. Submit to the Executive Director for a decision by the Stewards at their next meeting. A recommendation from the employee’s direct supervisor shall be required for consideration. Compensation for time spent at training will not be considered. However, Stewards will consider covering cost of the training either wholly or in part based on available funding.

II-C-3 Employee & Operations Handbook

GRADALIS shall establish, implement and periodically review its ““Employee Handbook – PERSONNEL POLICIES.”

II-D RECORDS POLICIES

GRADALIS shall establish and maintain an organized student, as well as employee, record-keeping system that is accurate, orderly and up-to-date allowing ready-access and review by appropriate parties. All records shall be protected from unauthorized access and undue risk-of-loss. Employees and Students shall have appropriate access to information contained in their files. Records shall be maintained for a period of time consistent with applicable statutes, regulations and sound business and educational practices. The Executive Director shall maintain all student and employee records in alignment with commonly held best practices for storing and maintaining such records. All personnel and student records shall be stored in a locked file in the Corporate Office.

II-D-1 Recordkeeping Systems

GRADALIS will develop and implement a recordkeeping system – both Students and Employees – to ensure that all records are maintained in an accurate, orderly and up-to-date manner. The Executive Director shall maintain all student and employee records in alignment with commonly held best practices for storing and maintaining such records.

II-D-2 Student Record Confidentiality

GRADALIS will develop and implement attendant to its recordkeeping system program/s to ensure the confidentiality of student records.

II-D-2-a Confidentiality of Student Records

GRADALIS follows FERPA policies regarding privacy of candidate records. All candidate records are kept in a secure location, many in both electronic and hard copy. Candidate records are kept for seven (7) years after graduation from training, however transcripts are kept indefinitely or for as long as Gradalis provides the training. Gradalis instructors and employees must follow these privacy policies and candidate information is shared with staff on a need-to-know basis.

The Executive Director maintains and secures all student files according to acceptable best practices for the candidate's confidential file. All candidate records and privacy policies refer to all components of the training including IDL. Each employee is responsible for safeguarding the confidential information obtained during employment. In the course of this work, employees may have access to confidential information regarding GRADALIS Waldorf Consulting & Services LLC, its suppliers, its candidates, or perhaps even fellow employees. Employees have a responsibility to prevent revealing or divulging any such information unless it is necessary to do so in the performance of one's duties. Access to confidential information should be on a "need-to-know" basis and must be authorized by the employee's supervisor. Any breach of this policy will not be tolerated.

II-D-2-a Confidentiality of Personnel Records

Employees have a right to inspect certain documents in their personnel file, as provided by law, in the presence of a company representative at a mutually convenient time. No copies may be made with the exception of documents the employee has previously signed. Employees may add comments to any disputed items in the file.

GRADALIS restricts the disclosure of personnel files to unauthorized individuals in GRADALIS. Any request for information contained in personnel files must be directed to the Executive Director. Only the Executive Director is authorized to release information about current or former employees. GRADALIS will comply with requests from law enforcement or other local, state or federal agencies conducting official investigations as legally required.

The Executive Director maintains personnel files for all employees. Included in the personnel file are such items as Signed Employee Engagement Letter, emergency information form, performance evaluations, letters of reprimand and any notice of probation or plan for improvement. Also included is the employees Self Evaluation and other signed documents to satisfy qualification for employment. Any unfavorable evaluation or letter of reprimand will be given in copy to the employee for signature, with an opportunity to respond in writing. A copy will be given to the employee.

II-D-3 Student Rights to Access & Review

GRADALIS will develop and implement a system whereby the rights of students, faculty and staff are ensured along with the capability to access and review their records, as appropriate.

GRADALIS follows FERPA policies regarding privacy of candidate records. All candidate records are kept in a secure location in both electronic and hard copy. Candidate records are kept for seven (7) years after graduation from training, however transcripts are kept indefinitely or for as long as Gradalis provides the training. Gradalis instructors and employees must follow these privacy policies and candidate information is shared with staff on a need-to-know basis.

To view candidate records, contact the Executive Director. It is important for instructors to document all communications with candidates over the course of the training. Any verbal warnings and/or communication of concerns about candidate progress or behavior should be documented and turned into the Executive Director for the candidate's confidential file. All candidate records and privacy policies refer to all components of the training including IDL.

II-D-4 Retention of Student Records

GRADALIS will develop and implement, as part of its recordkeeping system, a procedure understanding with clarity, as per the timing for the “sunset” in retention of records. GRADALIS follows FERPA policies regarding privacy of candidate records. All candidate records are kept in a secure location in both electronic and hard copy. Candidate records are kept for seven (7) years after graduation from training, however transcripts are kept indefinitely or for as long as Gradalis provides the training. Gradalis instructors and employees must follow these privacy policies and candidate information is shared with staff on a need-to-know basis.