

# Learner Records Privacy and Information Security Policy

**Effective Date:** March 2026

**Policy Owner(s):** Director of Education, Director of Operations

**Last Reviewed:** April 13, 2026

**Next Scheduled Review:** April 2027

**Version:** 1.0

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## Dates of Adoption and Revision

This policy was formally adopted by the Association for the Improvement of American Infrastructure (AIAI) in March 2026 and is reviewed annually to ensure continued alignment with recognized continuing education standards and AIAI governance practices.

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## Purpose

The purpose of this policy is to ensure the privacy, confidentiality, integrity, and security of learner records maintained by AIAI in connection with its continuing education and training programs.

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## Policy Statement

AIAI is committed to protecting the privacy and security of learner information collected through participation in its educational programs.

Learner records are maintained in secure systems and are accessible only to authorized personnel whose responsibilities require such access. AIAI limits the collection of learner information to that which is necessary for registration, course administration, completion verification, and certificate issuance.

Learner records are retained for a minimum of seven (7) years following program completion within AIAI's SharePoint database and are released only to the learner or to authorized third parties upon written request.

Certificates of completion are issued only after verification that all program requirements have been satisfied.

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## Records Maintenance and Retention

During active course delivery, learner records are maintained within AIAI's designated Learning Management System, currently TalentLMS at time of writing. Following program completion, records are securely archived in access-controlled SharePoint filing systems for long-term retention. AIAI

relies on vendor-managed secure cloud infrastructure with system redundancy and backup protocols to ensure continuity and protection of learner records.

Access to archived records is restricted to authorized AIAI education personnel. After the retention period has concluded, records may be archived further or permanently deleted in accordance with organizational data management practices.

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## Release of Learner Records

Learner records may be released only: Directly to the learner upon written request or to a third party with written authorization from the learner. AIAI does not release learner records without appropriate verification and authorization.

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## Issuance of Certificates

Certificates of completion and, where applicable, continuing education documentation are issued following confirmation that all program requirements have been met. Certificates include the learner's name, course title, and date of completion. Where applicable, continuing education units (CEUs) awarded are documented.

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## Reporting of Privacy or Record Security Concerns

Learners who believe their records have been accessed, released, or handled improperly may report concerns to:

Yousef Salama  
Director of Education  
[ysalama@aiai-infra.org](mailto:ysalama@aiai-infra.org)

Bobby Vanderhoof  
Director of Operations  
[bvanderhoof@aiai-infra.org](mailto:bvanderhoof@aiai-infra.org)

Reports will be reviewed promptly. Reported incidents are documented and reviewed by the Director of Education in coordination with organizational leadership to determine required corrective action and, where applicable, learner notification.

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## Questions Regarding This Policy

For questions or clarification regarding this policy, please contact:

Yousef Salama  
Director of Education  
[ysalama@aiai-infra.org](mailto:ysalama@aiai-infra.org)

Bobby Vanderhoof  
Director of Operations  
[bvanderhoof@aiai-infra.org](mailto:bvanderhoof@aiai-infra.org)

## Learner Records Privacy & Release Notification

**Effective Date:** March 2026

**Policy Owner(s):** Director of Education, Director of Operations

**Last Reviewed:** May 20, 2026

**Next Scheduled Review:** April 2027

**Version:** 1.0

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AIAI maintains learner records, assessment results, course completion information, and related educational records in accordance with its Records Privacy and Information Security Policy. Learner information is maintained securely and is accessible only to authorized personnel responsible for program administration, record maintenance, and CEU administration.

AIAI does not release learner records, transcripts, assessment results, completion status, or personally identifiable information to third parties without the learner's prior written authorization unless required by law or authorized by applicable policy.

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### Requests

Learners requesting the release of educational records, transcripts, assessment results, or course completion information may submit a written request to AIAI using the contact information below:

- learner full name;
- program or course name;
- description of records requested;
- recipient name and contact information; and
- learner authorization for release of information.

AIAI may request additional information to verify learner identity prior to releasing records.

Yousef Salama  
Director of Education  
[ysalama@aiai-infra.org](mailto:ysalama@aiai-infra.org)

Bobby Vanderhoof  
Director of Operations  
[bvanderhoof@aiai-infra.org](mailto:bvanderhoof@aiai-infra.org)

Requests will be reviewed and processed in accordance with AIAI's Records Privacy and Information Security Policy. Records release activities and related communications are maintained as part of AIAI's learner records administration process.

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