

## **CCS Administrative Procedure**

### **3.40.01-B Student Records**

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#### **Implementing Board Policy [3.40.01](#)**

**Contact: District Academic Services Officer, 434-5060**

#### **1.0 Purpose**

In accordance with Public Law 93-380, the Family Educational Rights and Privacy Act (FERPA) of 1974, Community Colleges of Spokane has adopted this procedure regarding student education records to ensure that information contained in such records is treated in a responsible manner with due regard to the personal nature of the information contained in these records.

#### **2.0 Limitations and Requirements**

- 2.1 A student has a right to inspect and review his/her education record.
- 2.2 The college shall not permit access to or the release of educational records, or personally identifiable information contained therein, other than "directory information" without the written consent of the student, except as listed in section 3.0, below.
- 2.3 The college will not release records that are not owned by the college.

#### **3.0 Release of Student Records**

Community Colleges of Spokane receives requests from outside sources for information about students, both past and present. The college shall not permit access to or the release of education records or personally identifiable information contained therein, other than "directory information," without the written consent of the student, to any party other than as follows:

- 3.1 Administrative/support staff and college faculty when information is required for a legitimate educational interest within the performance of their responsibilities to the college, with the understanding that its use will be strictly limited to those responsibilities.
- 3.2 Federal and state officials requiring access to educational records in connection with the audit and evaluation of a federally- or state-supported educational program or in connection with the enforcement of the federal or state legal requirements.
  - 3.2.1 In such cases the information required shall be protected by the federal or state official in a manner which will not permit the personal identification of students and their parent(s) to other than those officials.
  - 3.2.2 Such personally identifiable data shall be destroyed when no longer needed for such audit, evaluation or enforcement of legal requirements.
- 3.3 Agencies, such as the National Student Clearinghouse, or individuals requesting information in connection with a student's application for, or receipt of, financial aid.
- 3.4 Organizations conducting studies for, or on behalf of, the college for purposes of developing, validating or administering predictive tests, administering student aid programs, and improving instruction.
  - 3.4.1 Such studies shall be conducted in a manner that will not permit the personal identification of students by persons other than representatives of the organizations.
  - 3.4.2 Such information shall be destroyed when no longer needed for the purposes for which it was provided (RCW 40.14.060).
- 3.5 Accrediting organizations in order to carry out their accrediting functions may access information limited to those functions.

- 3.6 Any person or entity designated by judicial order, or lawfully issued subpoena, upon condition that the college makes a reasonable effort to notify the student of all such orders or subpoenas in advance of the compliance therewith (unless the order or subpoena specifically orders the student not be notified). The Patriot Act legislation requires that students will not be notified of such orders or subpoenas.
- 3.7 Information from educational records may be released to appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health or safety of a student or other person(s).
- 3.8 Spokane Community College, Spokane Falls Community College and the Institute for Extended Learning are part of District 17, CCS. For that reason educational records may be shared among the three entities for the purposes of admission, registration, library access, financial aid, billing and security.

#### **4.0 Directory Information**

- 4.1 The term "directory information" is defined as: information contained in an educational record of a student that would not be generally considered harmful or an invasion of privacy if disclosed. Directory information includes the student's name, major field of study, dates of attendance, grade level, enrollment status (e.g., full-time or part-time), participation in officially recognized sports, weight and height of members of athletic teams, degrees, honors and awards received.
- 4.2 Verification of enrollment is given.
- 4.3 The U.S. Department of Defense has authorized branches of the U.S. military to access directory information from U.S. colleges for recruitment purposes. Directory information under this provision, called the "Solomon Act," includes name, address, telephone listing, date and place of birth, level of education, academic major, degrees received, and the educational institution in which the student most recently was enrolled. Students who object to the release of the above information to military recruiters may request that this information not be released by written notification to the appropriate CCS Registrar's Office.
- 4.4 Students may request in writing that the college not release directory information except through written notice to the Registrar.

#### **5.0 Student's Right to Inspect**

CCS registrars' offices will assist students who want to inspect their education records.

- 5.1 For purposes of this procedure the term "education records" means those records, files, documents, and other materials which contain information directly related to a student, including records regarding the employment of a student when such employment is a result of, and directly related to, student status.
  - 5.1.1 Records will be made available within 45 days and the college may charge reasonable fees for preparing copies for students. This includes records that are kept in the following offices: admissions, registration, financial aid, cooperative work experience, placement, veteran services, cashiering, sponsored programs, student activities and intercollegiate athletics.
  - 5.1.2 The college reserves the right to have a college representative present during the review of a student's record; the representative may offer interpretation of the data within the record.
- 5.2 In the event a record contains information about other persons, the college will release only the portion of the record that pertains to the student.

- 5.3 Students may not inspect financial information submitted by their parents, confidential letters associated with admissions, and records to which they have waived their inspection rights.
- 5.4 Student records containing medical/psychological information are not available to anyone other than the individual(s) providing treatment; however, such records may be personally reviewed by a physician or other appropriate professional upon the student's written consent.
- 5.5 Some records may be withheld by the college. For example, academic transcripts are routinely withheld if the student has a financial obligation to the college.

## **6.0 Student's Right to Appeal (FERPA Hearing Process)**

- 6.1 Upon examination of records, a student who believes that his/her record is inaccurate or misleading can request a formal hearing.
  - 6.1.1 Requests for a hearing should be directed in writing to the Registrar's Office at each college.
  - 6.1.2 When a date, time and place for the hearing have been established, a student may present evidence at the hearing and be represented by an attorney, at the student's expense.
- 6.2 The hearing panel will include the chief student services officer or other appointed designee and the student's adviser/instructor.
- 6.3 The hearing process does not replace other processes for student grievances. For example, a grade appeal will be addressed through the Student Grade Appeal procedure.
- 6.4 The decision of the hearing panel will be based solely on the evidence presented at the hearing. A written summary of the hearing will be prepared and distributed to all parties. The summary will include the reasons behind any decisions made by the hearing panel. The student's records may be amended in accordance with the ruling of the hearing panel.
- 6.5 A student may add comments to his/her record if he or she is not satisfied with the ruling of the hearing panel. Such comments will be released whenever the records in question are disclosed. For example, an explanatory letter from the student may accompany a transcript.
- 6.6 Students who believe the hearing panel results are in error may contact the United States Department of Education, Room 4074 Switzer Building, Washington D.C. 20202.

## **7.0 Campus Contacts**

- 7.1 Spokane Community College
  - Dean of Student Services, Bldg. 15
  - Vice President of Student and Instructional Services, Bldg. 50
- 7.2 Spokane Falls Community College
  - Dean of Enrollment Services, Bldg. 17, Rm 147
  - Registrar, Bldg. 17, Rm 148
- 7.3 Institute for Extended Learning
  - Office of the Vice President of Student Services, Bldg. 27, Rm 247
  - Office of the Vice President of Learning, Bldg. 27, Rm 247

**8.0 Related Information**

- 8.1 [Chapter 132Q-02 WAC](#), Student records
- 8.2 [Public Law 93-380](#), the Family Educational Rights and Privacy Act (FERPA) of 1974
- 8.3 [RCW 40.14.060](#), Destruction, disposition of official public records or office files and memoranda -- Record retention schedules

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