

PRIVACY AND ACCESS TO STUDENT RECORDS  
(FERPA)

I. Policy Section  
8.0 Students

II. Policy Subsection  
8.6 Privacy and Access to Student Records (FERPA)

III. Policy Statement  
The Family Educational Rights and Privacy Act (FERPA) is a Federal law protecting the privacy of student education records. The law applies to all schools receiving funds under any applicable program of the U.S. Department of Education.

IV. Reason for the Policy  
Federal Law (The Family Educational Rights and Privacy Act of 1974)

The Family Educational Rights and Privacy Act (FERPA) afford students the following certain rights with respect to their educational records.

They are:

- A. The **right** to inspect and review the student's education records within 45 days of the day the College receives a request for access.
- B. The **right** to request the amendment of the student's education record that the student believes is inaccurate or misleading.
- C. The **right** to consent to disclosures of personally identifiable information contained in the student's education records except to the extent that FERPA authorizes disclosure without consent. One exception which permits disclosure without consent, is disclosure to school officials with legitimate educational interests.
- D. The **right** to file a complaint with the U.S. Department of Education concerning alleged failures by Grand Rapids Community College to comply with the requirements of FERPA.

V. Entities Affected by this Policy  
Students  
All Grand Rapids Community College Employees

VI. Who Should Read this Policy  
Students  
All Grand Rapids Community College Employees

VII. Related Documents

GRCC Catalog  
GRCC FERPA website: <http://cms.grcc.edu/ferpa>  
U.S. Department of Education website:  
<http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>  
Personally Identifiable Information Policy  
Records/Retention Policy

VIII. Contacts

Policy Owner: Registrar - Student Records/Registrar's Office  
Office of General Counsel

IX. Definitions

- A. Student – Any individual for whom educational records are maintained.
- B. Student Record – Any educational information or data recorded in any medium.
- C. Educational Record – Any record, with certain exceptions, maintained by an institution that is directly related to a student or students. This record may contain a student's name or information from which an individual student, or students, can be personally (individually) identified. These records include: files, documents, and materials in whatever medium (handwritten, print, electronic) which contain information directly related to students.
- D. Directory Information - Information not generally considered harmful or an invasion of privacy if disclosed. Including but not limited to: name, address, telephone listing, GRCC e-mail address, student status: part-time/full-time; freshman/sophomore, major field of study, weight and height of athletes, most recent previous school attended, photographs, date and place of birth, participation in officially recognized activities and sports, dates of attendance, degrees, date of graduation and awards.
  1. Directory Information does not include student identification numbers, Social Security numbers, or other personally identifiable information.
  2. A student's right to opt out of directory information disclosure under FERPA does not include the right to refuse to wear or disclose a student ID card or badge.
  3. Further disclosures by state and local educational authorities are allowed without student's consent on behalf of the institutions that that provided the personally identifiable information.
- E. School Official - Person employed by the College in an administrative, supervisory, academic, research, or support staff position (including law enforcement and health personnel).
  1. Company with whom the College has contracted; e.g., attorney, auditor, collection agency.
  2. Person serving on the Board of Trustees.

3. Student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

F. Legitimate Educational Interest - A school official has legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility to be determined by the Provost Office. Requests for information should be submitted to the Dean of Institutional Research or to the Registrar

G. Authorized representatives – Any entity or individual designated by the U.S. comptroller general: the U.S. attorney general; the secretary of education; or a state or local educational authority to perform an audit, evaluation, or any compliance or enforcement activity in connection with federal legal requirement that relate to federal – or state-supported education programs.

H. Education program – Is any program that is principally engaged in the provision of education, including early childhood education, postsecondary education, special education, job training, career and technical education, adult education, and any program administered by an educational agency or institution.

X. Procedures

A. Guideline for Faculty and Staff

1. Do not use any portion of Social Security number or Student ID number of a student in a public posting of any kind; e.g., grades or attendance. Students may view final grades using their GRCC Online Student Center.
2. Graded tests and assignments should only be accessible to the specific student submitting them. Faculty may use Blackboard or PeopleSoft Gradebook to post grades. Final grades must be posted in PeopleSoft.
3. When writing a letter of recommendation for a student, you must have written consent from the student if you plan to include anything other than directory information.

B. Stop Form for Information Release

The college may release Directory Information to other educational institutions about students who are on the graduation list. Students who do not wish this information released must fill out the Directory Information STOP Form. These forms are available on the Student Records/Registrar Office webpage.

C. FERPA Consent Form

Under FERPA guidelines, institutions will not disclose any information about students without prior written consent from the student. If a student would like the College to be able to discuss their student record with their parents or other individuals, they must complete the FERPA Consent Form located on the GRCC Student Records/Registrar web page at:

[https://cms.grcc.edu/sites/default/files/attachments/ferpa\\_consent\\_form.pdf](https://cms.grcc.edu/sites/default/files/attachments/ferpa_consent_form.pdf)

D. Student Review of their Records

1. Students should submit to the Registrar written requests that identify the record(s) they wish to inspect. The College will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the College official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.
2. Students may ask the College to amend a record that they believe is inaccurate or misleading. The student should write the College official responsible for the record, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading. If the College decides not to amend the record as requested by the student, the College will confirm in the record that it was modified, notify the student of the decision and advise the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

E. Posting of FERPA

FERPA information will be posted in the catalog, College website and the GRCC Student Handbook.

F. Subpoenas

Any subpoena related to a student or student records which are received by an office at Grand Rapids Community College should be sent directly to the Registrar. Subpoenas are time-sensitive documents, which must be hand delivered by staff to the Registrar.

G. Employee Guidelines

Employees who fail to take reasonable measures to secure student educational records will be subject to disciplinary actions.

XI. Forms

Stop Information Release Form  
FERPA Consent Form

XII. Effective Date

Revised December 7, 2012

XIII. Policy History

Adopted August 13, 1991

Updated for accuracy and Federal policy changes

XIV. Next Review/Revision Date

December 2015 or upon changes in State or Federal regulations