

**Student - Policy on Collection, Maintenance,
Access and Dissemination of Student Records**

Policy Number: 100.1051.113

Policy Revision Date: 2018-10-16

Policy Category: General Administrative

Policy Owner: Vice Dean

Policy Audience: Student Council

1. Definitions:

Student records are collected, maintained, accessed and disseminated in accordance with the Federal Family Educational Rights and Privacy Act (*20 USC 1232g*) and Pennsylvania state law (*22 Pa. Code 31.33*).

2. Leadership Council Review:

October 16, 2018

3. Introduction / Purpose:

Student records are collected, maintained and disseminated in accordance with the federal Family Educational Rights and Privacy Act (*20 USC 1232g*) and Pennsylvania state law (*22 Pa. Code 31.33*).

4. Governance and Enforcement:

Vice Dean

5. Policy:

The College's policy regarding student records will be reviewed annually for compliance to applicable law and will be published in the College's Student Handbook and on the College's portal to inform students of their rights. (Note: GCSOM does not intend to enroll students below the age of 18 and thus, the rights of parents under FERPA to review education records are not applicable as GCSOM will enroll only "eligible students" by FERPA definition.)

All students, current and former, have the right to review their education records, which include the following types of records:

Primary academic records maintained by the Registrar's Office (admission files after matriculation, transcripts of GCSOM coursework and any other coursework taken at other

colleges, written narrative evaluations from GCSOM coursework, standardized test results required in the curriculum).

Students who wish to review any of their education records must make a written request to the Registrar's Office. The Registrar's Office will reply to the request within five (5) working days after the request has been received and keep a record of students' requests in their files.

Students may request verbal or written explanations of any issues that may arise during the review. The review may not include letters of reference to which students have waived their rights to read. (Upon request, students have the right to be notified of the names of all persons making confidential recommendations. Such recommendations are used solely for the purpose for which they were specifically intended and waivers are not required as a condition for admission to GCSOM, receipt of financial aid from GCSOM, or receipt of any other services or benefits from GCSOM.)

Students may request copies of the eligible academic/education records reviewed at no charge.

Students have the right to request amendments to their education records if, after review, they believe that have discovered inaccuracies, inappropriate information or violations of their rights of any kind. This request must be made in writing to the Vice Dean, who, in consultation with the Registrar, will respond to the request in writing within two (2) weeks.

If this process does not resolve the issue to the student's satisfaction, the student has a further right to appeal in writing to the Dean of the College for a hearing. The Dean shall then constitute an impartial committee that may include faculty, administrators, counsel and students to hear the complaint.

The student shall have the right to counsel and/or advisors for assistance as well as the full opportunity to present the argument for an amendment to the education record. The committee shall hear the student and/or the student's representatives in the spirit of seeking an equitable resolution based solely on evidence presented. The Committee shall report its decision in writing within two (2) weeks.

If the student remains unsatisfied with the committee's decision, the student has the right to place into the appropriate education record a written statement commenting on the issue and/or reasons for disagreeing with the committee decision. The student's statement will become part of that education record.

GCSOM will not release any information from any student's education records, unless required or allowed by law, without a written request by the student specifying what information is to be released to whom. Records of information release requests are maintained by the Registrar's Office.

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The law allows the College to release directory information, which includes the student's name, address, telephone listing, date and place of birth, GCSOM e-mail address, major field of study, class year, dates of attendance, participation in officially recognized activities, degrees and awards received, degree dates, internships, residency or other post completion placements, and the most recent previous educational agency or institution attended by the student.

Students have the opportunity to opt out of directory information disclosures by contacting the Registrar and completing an opt out form.

There are other cases allowed by law in which education records may be released without prior consent by the student.

These include but may not be limited to disclosing to an alleged victim of any crime of violence or a non-forcible sex offense, the final results of any disciplinary proceeding conducted by the College against the alleged perpetrator of such crime or offense with respect to such crime or offense; disclosing the final results of any disciplinary proceeding conducted by the College against a student who is an alleged perpetrator of any crime of violence, or a non-forcible sex offense. If the College determines as a result of that disciplinary proceeding that the student committed a violation of the institution's rules or policies with respect to such crime or offense (the final results of any disciplinary proceeding shall include only the name of the student, the violation committed and any sanction imposed by the institution on that student and may include the name of any other student, such as a victim or witness, only with the written consent of that other student).

Disclosing information to teachers and school officials, including faculty and school officials in other schools, who have legitimate educational interests in the behavior of the student and including appropriate information in the education record of any student concerning disciplinary action taken against such student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the College community; disclosing information provided to the College under section 14071 of title 42 concerning registered sex offenders who are required to register under such section; disclosing information from education records in the lawful investigation and prosecution of terrorism; disclosing records in response to judicial orders and subpoenas; disclosing education records to government agencies as proscribed by law; disclosing education records in health and safety emergencies as proscribed by law; and disclosing financial aid information to agencies to which the student has applied for or is receiving aid. Certain education records are routinely disclosed to college officials and employees who have a legitimate educational interest in those records.

Their need to know such information is based upon the duties of their jobs, including the maintenance of those records. Thus, while the officers of the College have full access to all student educational records in the course of carrying out their official duties, access to information is limited for others on a need to know basis. Because files for grades and general academic information, admissions, finances and financial aid are largely automated, access to

these files is limited by computer codes. Thus, for example, an admissions counselor needs access only to the admissions file and that person's access is so limited.

The Registrar, as the official information Steward, approves requested access based on legitimate educational interest. Physical files (hard copy files) of various academic/education records are maintained by the Registrar's Office in secure locations under lock and key. (Non-therapeutic personal counseling records, by FERPA definition not education records, are kept under lock and key in the Center for Learning Excellence office and are accessible only to professional counseling staff.)

Access to these confidential files, like access to electronic files, is strictly limited to those with a legitimate educational interest and is subject to approval by the Associate Dean of Student Affairs.

Students who believe that GCSOM has failed to comply with the regulations of the Family Educational Rights and Privacy Act may make a written complaint to the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, DC 20202-5920.

6. Key Stakeholders:

Student Council