

Student Records Policies and Procedures (FERPA)

1. Definitions
2. Annual Notification
3. Procedure to Inspect Education Records
4. Right of College of Law to Refuse Access
5. Refusal to Provide Copies
6. Fees for Copies of Records
7. Types, Locations and Custodians of Education Records
8. Disclosure of Education Records
9. Redisclosure of Education Records
10. Record of Requests for Disclosure
11. Directory Information
12. Correction of Education Records

1. Definitions

For the purposes of this policy, Pacific Northwest Christian College (“College”) has used the following definitions of terms.

Student – any person who attends or has attended G4HCC.

Education records – any record (in handwriting, print, tapes, film or other medium), maintained by G4HCC or an agent of the College which is directly related to a student, **except:**

- A personal record kept by an employee, if it is kept in the personal possession of the individual who made the record, and information contained in the record has never been revealed or made available to any other person except the maker’s temporary substitute.
- An employment record of an individual whose employment is not contingent on the fact that he or she is a student, provided the record is used only in relation to the individual’s employment.
- Alumni records which contain information about a student after he or she is no longer in attendance at G4HCC and which do not relate to the person’s performance or activities while attending G4HCC.

FERPA – Family Educational Rights and Privacy Act of 1974 (20 USCA 1232g).

2. Annual Notification

Students will be notified of their FERPA rights annually by one of the following methods: publication in the student handbook or by statement in the student registration packets.

3. Procedure to Inspect Education Records

Students may inspect and review their education records upon request to the appropriate record custodian.

Students should submit to the record custodian or an appropriate College staff person a written request which identifies as precisely as possible the record or records he or she wishes to inspect.

The record custodian or an appropriate College staff person will make the needed arrangements for access as promptly as possible and notify the student of the time and place where the records may be inspected. Access must be given within a reasonable period of time under the circumstances but within 30 days or less from the receipt of the request. Upon written request, the record custodian will attempt to provide currently enrolled students with copies of their law school transcripts within two days after receipt of the request.

When a record contains information about more than one student, the student may inspect and review only the records which relate to him or her.

4. Right of G4HCC to Refuse Access

G4HCC reserves the right to refuse to permit a student to inspect the following records:

- The financial statement of the student's parents.
- Letters and statements of recommendation for which the student has waived his or her right of access.
- Records connected with an application to attend the college if that application was denied.
- Those records which are excluded from the FERPA definition of education records.

5. Refusal to Provide Copies

G4HCC reserves the right to deny transcripts or copies of records not required to be made available by law in any of the following situations:

- The student has an unpaid financial obligation to G4HCC.
- There is an unresolved disciplinary action against the student and the records are not relevant to the disciplinary action.
- The student requests a partial or incomplete transcript of their completed course work.

6. Fees for Copies of Records

The fee for copies will be \$1.00 for ten pages or less and \$0.10 additional per page for each page more than ten pages, plus postage, if applicable.

7. Types, Locations and Custodians of Education Records

The following is a list of the types of records that G4HCC maintains, their locations and their custodians.

TYPES

LOCATION

CUSTODIAN

Admissions Records	Admissions Office	Registrar Admissions & Financial Aid
Cumulative Academic Records (current students and students within 5 years after graduation or withdrawal)	Registration Office	Registrar
Cumulative Academic Records (former students more than 5 years after graduation or withdrawal)	Registration Storage Room	Registrar
Financial Aid and Scholarship	Admissions Office (113)	Financial Aid Officer
Placement Records	Business Office	Business Officer
Disciplinary Records	Dean's Office	Dean
Occasional Records (student education records not included in the types listed above such as minutes of College Council meetings, copies of correspondence in offices not listed, etc.)	The appropriate official will collect such records, direct the student to their location, or otherwise make them available for inspection and review	The College staff person who maintains such occasional systems records

8. Disclosure of Education Records

G4HCC will disclose information from a student's education records only with the written consent of the student, **except:**

- a. To school officials who have a legitimate educational interest in the information in the records.
 - (1) A school official is:
 - A person employed by the College in an administrative, supervisory, academic or research, or support staff position, but not including any student currently enrolled in G4HCC; or
 - A person employed by or under contract to G4HCC to perform a special task, such as the attorney or auditor, but not including any student currently enrolled in G4HCC.
 - (2) A school official has a legitimate educational interest if the official is:
 - Performing a task that is specified in his or her position description or by a contract agreement; or
 - Performing a task related to providing academic advice to the student, if (a) the school official has been appointed the student's advisor; (b) the student has sought academic advice from the school official; (c) the student has applied to

that school official for a research or teaching assistantship; or (d) the student has asked that school official to serve as a reference; or

- Performing a task related to the discipline of a student; or
- Providing a service or benefit requested by the student relating to counseling, job placement or financial aid, or providing a service or benefit to the student or the student's family under emergency circumstances such as safety, health care or counseling.
 - To officials of another school, upon request, in which a student seeks or intends to enroll.
 - To certain officials of the U.S. Department of Education, the Comptroller General, and state and local educational authorities, in connection with certain state or federally supported education programs.
 - In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid.
 - If required by a state law requiring disclosure that was adopted before November 19, 1974.
 - To organizations conducting certain studies for or on behalf of the University.
 - To accrediting organizations to carry out their functions.
 - To parents of an eligible student who claim the student as a dependent for income tax purposes.
 - To comply with a judicial order or a lawfully issued subpoena.
 - To appropriate parties in a health or safety emergency.
 - To an institution or a person to whom a student has requested that a school official write a letter of reference, unless the student expressly directs the school official not to disclose information.

9. Rediscovery of Education Records

A person receiving information in accordance with the provisions of this policy may redisclose that information to another party without obtaining prior consent as long as the redisclosure also meets the requirements of 6-1-8, e.g. the redisclosure is made to another school official who has a legitimate educational interest in the information or the redisclosure is to an institution or a person to whom a student has requested that a school official write a letter of reference.

10. Record of Requests for Disclosure

G4HCC will maintain a record of all requests for and/or disclosure of information from a student's education records. The record will indicate the name of the party making the request, any additional party to whom it may be redisclosed, and the legitimate interest the party had in requesting or obtaining the information. The record requests may be reviewed by the eligible

student or parent, if the parent claims the student as a dependent for income tax purposes.

11. Directory Information

G4HCC designates the following items as Directory Information:

- Student's name
- Address
- Telephone number
- Date and place of birth
- Major field of study
- Participation in officially recognized activities or sports
- Weight and height of members of athletic teams
- Dates of attendance
- Degrees, academic and public service honors, and awards received
- Educational agencies or institutions attended and major fields of study
- Current semester class schedule
- Photograph

G4HCC may disclose any of those items without prior written consent, unless notified in writing to the contrary by August 15th of each academic year.

12. Correction of Education Records

Students have the right to ask to have records corrected that they believe are inaccurate, misleading or in violation of their privacy or other rights. Following are the procedures for the correction of records:

- a. A student must ask the Director of Student Affairs to amend a record, identifying in writing the part of the record they want changed and specifying why they believe it is inaccurate, misleading or in violation of his or her privacy or other rights.
- b. G4HCC may comply with the request or it may decide not to comply. In all cases where the College decides not to comply, it shall notify students of the decision and advise them of their right to hearing to challenge the information believed to be inaccurate, misleading or in violation of the student's rights.
- c. Upon request, the College will arrange for a hearing, and notify the student, reasonably in advance, of the date, place and time of the hearing.
- d. The hearing will be conducted by G4HCC Curriculum Review Committee. The student shall be afforded a full and fair opportunity to present evidence relevant to the issues raised in the original request to amend the student's education records.
- e. G4HCC will prepare a written decision based solely on the evidence presented at the hearing. The decision will include a summary of the evidence presented and the reasons for the decision.
- f. If G4HCC decides that the challenged information is not inaccurate, misleading or in violation of the student's right of privacy or other rights, it will notify the student that they have a right to place in the record a statement commenting on the challenged information and/or a statement setting forth reasons for disagreeing with the decision.
- g. The statement will be maintained as part of the student's education records as long as the contested portion is maintained. If G4HCC discloses the contested portion of the record, it must also disclose the statement.

- h. If G4HCC decides that the information is inaccurate, misleading or in violation of the student's right of privacy or other rights, it will amend the record and notify the student, in writing, that the record has been amended. The person supplying or entering the information that has been deleted or modified shall also be notified of that action and the reasons for it.