

3.2.1 Student Data Integrity & FERPA Policies and Procedures

Definitions

A student is an individual who has either applied for enrollment, who is currently enrolled, or has been formerly enrolled at Central Lakes Community and Technical College. All students have the same rights regarding their educational data. Educational records are those records directly related to a student and maintained by Central Lakes College. Educational records include, but are not limited to admissions materials, financial aid records, transcripts, class lists, class schedules, graded exams or papers, records of disciplinary proceedings, photographs, and work study records. Certain information is exempted from the definition of “education record,” including:

1. “Sole possession” notes of individuals records which remain in the sole possession of the maker, are used only as a personal memory aid, are not accessible or revealed to any other individual, and are destroyed at the end of the school year;
2. Alumni records - information about individuals when no longer students;
3. Medical treatment records, only accessible by treatment providers
4. Records held as part of documentation required by the Office of Disabilities

A school official is a person employed by Central Lakes College in an administrative, supervisory, academic, or support staff position; a person or company with whom Central Lakes College has contracted; a person serving on the Board of Trustees or in the Office of the Chancellor; a student serving on an official college committee; a college security officer acting in a health or safety emergency; or a person assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an educational record in order to fulfill his or her professional responsibility.

Student rights under FERPA and MGDPA

A student has a right to inspect and review his or her educational records. Requests should be made in writing to the Registrar. Central Lakes College will provide access to view educational records immediately if possible, or within ten days of the student’s request. A student requesting a copy of his or her educational records will be assessed the cost according to current college fee rates. More information is below under “Procedure to inspect education records.” A student has a right to consent to disclosures of information, which identify him or her personally, except to the extent that these disclosures are allowed without student consent under state and federal law. A student has the right to request that the Office of Records and Registration correct educational records, which he or she believes to be inaccurate or misleading. The student should petition the

Registrar and clearly identify the part of the record he/she wants changed as well as why the record is inaccurate or misleading. More information is below under “Procedure to correct education records.” Note: the right to challenge a grade does not apply under this policy. Students will be notified of their FERPA and MGPDA rights through publications of the policy on the college website and in the Catalog. A student has the right to file a complaint with the U.S. Department of Education concerning alleged failures by Central Lakes College to comply with the requirements of FERPA. Students desiring to file a complaint should address the complaint to:

Family Policy Compliance Office
U.S. Department of Education
600 Independence Avenue, SW
Washington, DC 20202-4605

Consent for release

Central Lakes College will not permit access to or the release of personally identifiable information contained in student educational records without the writ-ten consent of the student to any third party (including parent/guardian, dependent, or spouse/domestic partner), except as authorized by FERPA and MGDPA or other applicable law. A student may grant consent by completing an Authorization to Release Student Information form, available from the Records and Registration Department and at <http://www.clcmn.edu/registration/registration-forms/> in electronic and PDF formats.

Directory information

Directory information is information not generally considered harmful or an invasion of privacy if disclosed to the public. Central Lakes has the authority to release the following information classified as directory information to the public:

- Student's name
- Student's Hometown
- Student's Date of graduation
- Student's Major field of study
- Student's Enrollment status (i.e., enrolled, withdrew, full-time or part-time)
- Student's Degrees, honors and awards received
- Student's Dates of attendance
- Student's Participation in officially recognized activities & sports
- Student's Height and weight of athletes
- Student's Photographs (stills or motion)
- Student's StarID*
- Student's E-mail address*

*Student email addresses and Star ID numbers are defined as Limited Directory Data for enterprise technology related purposes internal to the Minnesota State Colleges and Universities system that are approved by System Office IT, including, but not limited to, inclusion of email addresses and Star ID numbers in a directory accessible to Minnesota State students and employees.

Students may direct that any or all of the above-listed Directory Information be withheld from public disclosure by notifying the Registrar in writing. Non-Disclosure of Public Information forms are available from the Records and Registration Department and at <http://www.clcmn.edu/registration/registration-forms/> in electronic and PDF formats.

Identity Verification

College personnel will verify a student's identity before sharing non-directory information. The following steps will be taken to verify a student's identity:

In Person: College personnel will request the student to input Tech ID number or Social Security Number (SSN) and request to see a picture ID. If a picture ID is not available, the CLC employee will ask the student to verify full name and one or more of the following:

- Student's address
- Student's date of birth
- Student's e-mail address
- Student's telephone number

Receiving Telephone Calls: Before providing information via telephone, college personnel will verify the identity of the individual requesting information by verifying the student's full name and Tech ID or SSN and in addition, one or more of the following:

- Student's address
- Student's date of birth
- Student's e-mail address
- Student's telephone number

Receiving E-mail: before providing information via e-mail, college personnel will verify the identity of the individual requesting information by verifying the student's full name and Tech ID or SSN and in addition, one or more of the following:

- Student's Address
- Student's Date of birth
- Student's E-mail address
- Student's Telephone number

Release without consent

As allowed under FERPA and MGDPA, Central Lakes College has the right to release student records without student consent. Examples of release without consent include the following individuals and agencies:

- Appropriate school officials with a legitimate educational interest.
- Specified officials for audit, accrediting, or evaluation purposes.
- Appropriate parties in connection with providing financial aid to a student.
- Appropriate officials in cases of health and safety emergencies.
- State and local authorities pursuant to specific State law.
- Compliance with a judicial order or lawfully issued subpoena.
- Military recruiting personnel, under the Solomon Amendment of the National Defense Authorization Act. In addition to directory information, Central Lakes College must disclose address, telephone number, and date of birth.
- The National Student Clearinghouse for the purpose of providing enrollment and graduation verification to employers and financial lenders.
- Another educational agency or institution, where a student intends to enroll, is enrolled, or from which a student receives services.
- Central Lakes College Foundation (Alumni Records).

A student may direct that any or all of the directory information be withheld from public disclosure by notifying the Registrar in writing. The non-disclosure request will be permanent unless the student requests otherwise. For questions concerning your rights, please contact the Registrar.

Course grades and student transcripts

Course grades and transcripts are an essential element of student records and the following supplemental policies shall govern these records at Central Lakes College:

- Instructors will take care to not reveal individual student grades. If grades are posted at a location accessible to all students, no personal identification, including name, social security number, or any part of those identifiers may be used in conjunction with posted grades
- Student grades will not be revealed over the phone
- All requests for transcripts must be received in writing.

Procedure to inspect education records

Students may inspect and review records upon request to the Registrar. Students should submit a written request which identifies as precisely as possible the record or records he or she wishes to inspect. The Registrar or an appropriate Central Lakes College staff person will make 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 in ten days or less from the date of

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. Under FERPA and MGDPA, a college or university cannot deny students access to their education records; however, it may deny copies in circumstances specified by institutional policy. Central Lakes College reserves the right to deny copies of any of the following records:

- The financial records or statements of the student's parents or legal guardians.
- Letters and statements of recommendations for which the student has waived his or her right to access.
- Those records which are excluded from the FERPA or MGDPA definition of education records.
- Official transcripts when there is a business office, records, or library hold on the student record. However, unofficial transcripts will be released regardless of holds on a student record.
- Educational records that include a set of standardized test questions. (An exam or standardized test that is not directly related to a student is not an education record and therefore is not subject to FERPA access provisions.) Procedure to correct education records

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

1. A student must request, in writing, that the Registrar amend a record. In so doing, the student must identify the part of the record to be amended and specify why the student believes it is inaccurate, misleading or in violation of his or her privacy rights.
2. The Registrar will decide whether or not to comply with the request. If the college decides not to comply, the Registrar will notify the student of the decision and advise the student of his or her right to a hearing to challenge the information believed to be inaccurate, misleading, or in violation of the student's rights.
3. Upon request, Central Lakes College will arrange for a hearing and notify the student in advance of the date, place, and time of the hearing.
4. The hearing will be conducted by the Vice President of Academic and Student Affairs and Dean of Student Services. The student shall be afforded ample opportunity to present evidence relevant to issues raised in the original request to amend the student's education records. The student may be assisted by a Central Lakes College faculty or staff member serving in an advisory capacity.
5. The Vice President of Academic and Student Affairs and Dean of Student Services 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.
6. If Central Lakes College decides that the information is inaccurate, misleading, or in violation of the student's privacy rights, the record will be amended and the student notified, in writing, of the change.
7. If Central Lakes College decides that the challenged information is not inaccurate, misleading, or in violation of the student's privacy rights, the student will be notified that he or she has the 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.

8. The statement will remain part of the student's education records as long as the contested information is maintained. If Central Lakes College discloses the contested portion of the record, it must also disclose the student's statement.

*Each student has the right under FERPA to file with the Department of Education a complaint under FERPA Regulations 99.63 and 99.64 concerning alleged failures by Central Lakes College to comply with the requirements FERPA.

Notice of data practices access personnel

The Responsible Authority for data practices compliance and access to government data for Central Lakes College is the Registrar. Requests for Student Data should be directed to the Registrar: Office of Records and Registration, 218-855-8034. Requests for Personnel Data should be directed to the Director of Human Resources, 218-855-8054. Students who have questions or concerns about obtaining access to data or other data practices issues may contact the campus Data Practices Compliance Officer: Registrar, Office of Records and Registration, 218-855-8034. The address for Central Lakes College, Brainerd Campus is 501 West College Drive, Brainerd, MN 56401 or Staples Campus 1830 Airport Road, Staples MN 56479.

The college website address is www.clcmn.edu.

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Signature of College President _____

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