



3.2.1 Student Data Integrity & FERPA Policies and Procedures

Definitions:

A student is an individual who has either applied for enrollment, is currently enrolled, or has been formerly enrolled at Central Lakes 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 that 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 who are no longer students;
3. Medical treatment records are only accessible to treatment providers
4. Records held as part of the documentation required by Accessibility Services

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 their tasks. A school official has a legitimate educational interest if they need to review an academic record to fulfill their professional responsibilities.

Student rights under the Family Educational Rights and Privacy Act (FERPA) and the Minnesota Government Data Practices Act (MGDPA)

A student has the right to inspect and review their educational records. Requests should be made in writing to the Registrar. Central Lakes College will provide immediate access to view academic records, if possible, or within ten days of the student's request. A student requesting a copy of their educational records will be charged the current college fee rate. More information is below under "Procedure to inspect education records." A student has the right to consent to the disclosure of personally identifiable information, except to the extent that such disclosure is permitted without the student's consent under state and federal law. A student has the right to request that the Office of Records and Registration correct educational records the student believes are inaccurate or misleading. The student should petition the Registrar, identifying the part of the record they wish to change, and explain why the record is incorrect 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 the following:

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 written 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 for the Release of Student Information form, available in electronic and PDF formats at [this link](#).

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
- Students' height and weight of athletes
- Student's Photographs (stills or motion)
- Student's StarID*
- Student's Email 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 is approved by System Office IT, including, but not limited to, the inclusion of email addresses and Star ID numbers in a directory accessible to Minnesota State students and employees.

Notwithstanding any other provision of this policy, the following information is defined as Limited Directory Data for purposes of sharing with LeadMN so that the association can

communicate with its members: Student name, email address, and Student Change Code (NEW/RTN/DROP).

Notwithstanding any other provision of this policy, the following information is defined as Limited Directory Data for purposes of voter registration: Student TechID number and student permanent, local, and temporary addresses.

Students may direct that any or all Directory Information be withheld from public disclosure by notifying the Registrar in writing using the Non-Disclosure of Public Information form available in electronic and PDF formats at [this link](#). The non-disclosure request will remain in effect unless the student requests otherwise.

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 that the student input a Tech ID number or Social Security Number (SSN) and provide a picture ID. If a picture ID is not available, the CLC employee will ask the student to verify their full name and one or more of the following:

- Student's address
- Student's Date of birth
- Student's email 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 email address
- Student's telephone number

Receiving Email: Before providing information via email, 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 email address
- Student's telephone Number

Release without consent

As permitted under FERPA and MGDPA, Central Lakes College may 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, according 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. Therefore, in addition to directory information, Central Lakes College must disclose the address, telephone number, students' CLC email address, and Date of birth for students 17 and older.
- The National Student Clearinghouse provides 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)

Students may direct that any or all Directory Information be withheld from public disclosure by notifying the Registrar in writing using the Non-Disclosure of Public Information form available in electronic and PDF formats at [this link](#). The non-disclosure request will remain in effect unless the student requests otherwise.

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 not to 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 that identifies the record or records they wish to examine as precisely as possible. 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 granted within 10 days of 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 that relate to them. Under FERPA and MGDPA, a college or university cannot deny students access to their education records; however, it may deny copies in the 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 their right to access.

- Those records that are excluded from the FERPA or MGDPA definition of education records.
- Official transcripts are required 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's 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 request that records be corrected if they believe they 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 doing so, the student must identify the part of the record to be amended and explain why they believe it is inaccurate, misleading, or violates their privacy rights.
2. The Registrar will determine whether 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 their 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 before the Date, place, and time of the hearing.
4. The Vice President of Academic and Student Affairs and Dean of Student Services will conduct the hearing. 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. Suppose Central Lakes College decides that the information is inaccurate, misleading, or violates the student's privacy rights. In that case, the record will be amended, and the student will be notified, in writing, of the change.
7. Suppose Central Lakes College decides that the challenged information is not inaccurate, misleading, or in violation of the student's privacy rights. In that case, the student will be notified of the right to place in the record a statement commenting on the challenged information and 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 of FERPA.

Notice of data practices: access personnel

The Responsible Authority for data practices compliance and access to student data for Central Lakes College is the Registrar. Requests for Student Data should be directed to the Registrar's Office of Records and Registration at 218-855-8038. Requests for employee personnel data should be directed to the Vice President of Human Resources and Culture at 218-855-8054.

Students who have questions or concerns about obtaining access to data or have other data practices issues may contact the campus Data Practices Compliance Officer (i.e., Registrar) at 218-855-8038. Central Lakes College's Brainerd Campus address is 501 West College Drive, Brainerd, MN 5640. CLC's Staples Campus address is 1830 Airport Road, Staples, MN 56479.

The college website is www.clcmn.edu.

Updated 11/15/2023: For voter registration, state law changes.

Updated 10/14/2022 for federal Solomon Amendment changes.

Date of implementation/Presidential Approval: 7/1/2016

Date of last review: 7/31/2025