

A. POLICY STATEMENT

Stephens College complies with the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, designed to protect student privacy and to ensure the accuracy of educational records.

Under FERPA, eligible students have certain rights with respect to their education records. (As FERPA relates to Stephens College, an “eligible student” is a student who is 18 years of age or older or who attends a postsecondary institution.) These rights include:

1. The right to inspect and review their education records within 45 days after the day Stephens College receives a request for access. A student should submit to the Office of the Registrar (in person to LRW 248 or by email to registrar@stephens.edu) a written request that identifies the record(s) the student wishes to inspect. The Registrar will make arrangements for access and notify the student of the time and place where the records may be inspected.

If the requested records are not maintained by the Registrar’s Office, the Registrar or her designee shall advise the student of the correct official to whom the request should be addressed.

2. The right to request the amendment of the student’s education record(s) that the student believes is inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA.

A student who wishes to ask Stephens College to amend a record should write the Registrar (or whatever school official is responsible for the record, as indicated by the Office of the Registrar) to clearly identify the part of the record the student wants changed, and specify why it should be changed.

If Stephens College decides not to amend the record as requested, the College will notify the student in writing of the decision and the student’s 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.

3. The right to provide written consent before the College discloses personally identifiable information (PII) from the student’s education records, *except to the extent that FERPA authorizes disclosure without consent.*

A postsecondary institution may disclose Personally Identifiable Information from education records *without obtaining prior written consent of the student:*

- To other school officials, including faculty, within the College whom the College has determined to have legitimate educational interests. A school official is a person employed by Stephens College in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or

grievance committee. A school official also may include a volunteer or contractor outside of the College who performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for Stephens College.

- To officials of another educational institution where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of §99.34. (§99.31(a)(2))
- To authorized representatives of the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is responsible for supervising the College's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§99.31(a)(3) and 99.35)
- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§99.31(a)(4))
- To organizations conducting studies for, or on behalf of, the College, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§99.31(a)(7))
- To parents of an eligible student if the student is a dependent for IRS tax purposes. (§99.31(a)(8))
- To comply with a judicial order or lawfully issued subpoena. (§99.31(a)(9))
- To appropriate officials in connection with a health or safety emergency, subject to §99.36. (§99.31(a)(10))
- Information the school has designated as directory information under §99.37. (§99.31(a)(11))
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of §99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the

finding. (§99.31(a)(13))

- To the general public, the final results of a disciplinary proceeding, subject to the requirements of §99.39, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the College's rules or policies with respect to the allegation made against him or her. (§99.31(a)(14))
 - To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the College, governing the use or possession of alcohol or a controlled substance if the College determines the student committed a disciplinary violation and the student is under the age of 21. (§99.31(a)(15))
4. The right to withhold the disclosure of "Directory Information." FERPA allows Stephens College to disclose appropriately designated "directory information" upon request without a student's written consent. Directory information is information that is generally not considered harmful or an invasion of privacy if released, and includes:
- A student's name, address, telephone number, email address;
 - A student's date and place of birth, dates of attendance, and grade level;
 - A student's major field of study, most recent educational agency or institution attended, and degrees, honors and awards received;
 - A student's photograph when the student is participating in officially recognized College activities and athletics;
 - A student's weight and height as a member of an athletic team;
 - A student's ID number, user ID or other personal identifier used to communicate in electronic systems that cannot be used to access education records without a PIN, password, etc. (a student's SSN cannot be used for this purpose).

Students who wish to withhold directory information should contact the Office of the Registrar (LRW 248; (573) 876-7277; registrar@stephens.edu). Stephens College assumes no liability for honoring a student directive that directory information be withheld.

5. The right to file a complaint with the U.S. Department of Education concerning alleged failures by Stephens College to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, §99.32 of FERPA regulations require the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures.

Questions about FERPA and student records may be directed to the Office of the Registrar (573) 876-7277 or registrar@stephens.edu) or to the Office of the Vice President for Academic Affairs (573) 876-7213 or academicaffairs@stephens.edu).

Students who wish to allow parents or others who would not otherwise be allowed under FERPA to review their educational records should visit the Office of the Registrar (LRW 248) to sign the appropriate authorization form.