Access & Disclosure Policy

Keene State College Policies and Procedures

Access and Disclosure Policy for Student Education Records

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Introduction

The Family Educational Rights and Privacy Act of 1974 as Amended (FERPA) affords certain rights to students concerning their education records. The Act grants each student the right to inspect and review his/her education records, seek to have the records amended, and have some control over the disclosure of information from his/her records.

Keene State College may not disclose information contained in education records without the student's written consent except under conditions specified in the Act. Furthermore, Keene State College must conform to fair information practices, and in so doing assure students that information contained in education records will be used only for intended purposes and that those responsible for data take reasonable precautions to prevent misuse of the data.

Access to education records is restricted to those formally designated as officers or appropriate officials of Keene State College and the University System of New Hampshire. Designated officers and officials may have access on an official need to know basis. FERPA provides for student employees to be included within the category of "school officials". A student employee performing a task or function covered under the institution's definition of legitimate educational interest (i.e., need to know) may be granted access to education records of other students.

A Keene State College employee who in his/her role as an employee requires access to information contained in education records to complete assigned

work responsibilities must:

1. complete training regarding FERPA, confidentiality policies and related guidelines, and
2. assume the responsibility associated with employment for maintaining the confidentiality of student education records he/she encounters in completion of assigned tasks.

These requirements emphasize the fact that the non-directory information contained in student education records is confidential and every reasonable step must be taken to minimize the potential for any violation of student rights (i.e., FERPA) by the unauthorized release of non-directory information.

Disclosure to a school official having a legitimate educational interest does not constitute institutional authorization to transmit, share, or disclose any or all information received to a third party. **Any unauthorized disclosure of personally identifiable information from the education record of the student is prohibited.**

Definitions

Act Refers to the Family Education Rights and Privacy Act of 1974 as Amended, enacted as Section 438 of the General Education Provisions Act (20 U. S. C. 1232g).

Directory Information Defined by Keene State College as the following: Name, Mailing Address, Mailing Telephone, Local/campus address, Local/campus telephone, e-mail address (KSC), Date/Place of birth, Major(s), Dates of attendance, Degree(s) and awards received. All other information is considered to be non-directory information subject to provisions of the Act.

Disclosure Permitting access to or the release, transfer, or other communication of education records of the student or the personally identifiable information contained therein to any party, orally, in writing, by electronic means, or by any other means.

Education Records Those records directly related to a student and maintained by Keene State College or by a party acting for the institution.

Records containing personally identifiable information, in any medium are covered by FERPA unless identified in one of the Act’s excluded categories.

Legitimate Educational Interest The official need to review an education record by a school official in order to fulfill his or her professional responsibility.

School Official Person employed by Keene State College in an administrative, supervisory, academic or research, or support staff position; a person or company with whom Keene State College has contracted; a person serving on the Board of Trustees or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

Student Any individual for whom Keene State College maintains educational records. The term refers to all persons who have enrolled in courses, but does not include any individual who has not been in attendance at Keene State College.

Training

An employee whose work responsibilities require access to information contained in education records must successfully complete training prescribed by Keene State College. The completion of training is a prerequisite for access to student education records and the establishment of a computer account to be used for the purpose of accessing student education records in completion of assigned work responsibilities. An employee may also be responsible for completing additional module or application-specific training specified by Keene State College or any of its constituent offices and functions.

Employee Computer Accounts

An employee must never operate on an account and password assigned to another individual. Doing so constitutes a violation of the Computer & Network Use Policy.

An employee will be issued an individual account or be issued a password to access a generic account designed for a specific group of individuals who may

be performing a similar function (e.g., service desk). In either case, these accounts are to be used for work-related responsibilities and must not be used by the employee when performing tasks unrelated to Keene State College employment.