

DOANE COLLEGE FERPA POLICY STATEMENT

The Family Educational Rights and Privacy Acts of 1974 (commonly referred to as “FERPA” or the “Buckley Amendment”) is designed to protect the confidentiality of the records that educational institutions maintain on their students and to give students access to their records to assure the accuracy of their contents. The Act affords students certain rights with respect to their Education Records. They are:

1. **ACCESS TO EDUCATION RECORDS:** students have the right to inspect and review their Education Records within 45 days of the day the College receives a written request for access, anytime after their matriculation. See below for the following categories related to Access to Educational Records:
 - A. Definitions
 - B. Types, locations and custodians of records
 - C. Procedure to inspect records
 - D. Right to refuse access
 - E. Refusal to provide copies
 - F. Fee for copies of records
 - G. Annual Notification
2. **REQUEST FOR AMENDMENT OF EDUCATION RECORDS:** students have the right to request amendment of Education Records if they believe the records are inaccurate, misleading or in violation of their privacy rights. See below for information regarding destruction of records.
3. **DISCLOSURE OF EDUCATION RECORDS:** students have the right to consent to disclosures of personally identifiable information in Education Records, except to the extent that the Act or any other superseding law authorizes disclosure without student consent. See below for the following categories related to Disclosure of Education Records:
 - A. School officials defined
 - B. Legitimate educational interest
 - C. Consent for disclosure
 - D. Record of disclosures
 - E. Directory Information
4. **COMPLIANCE:** students have the right to contact the Family Policy Compliance Office with complaints concerning the College’s compliance with the requirements of FERPA.

1. ACCESS TO EDUCATION RECORDS

1A. Definitions

For the purposes of this policy, Doane College employs the following definitions of terms.

Student any person who attends or has attended Doane College

Education Records any record (in handwriting, print, electronic form, tapes, film, or other medium) maintained by Doane College or an agent of the College which is directly related to a student, except:

- Records kept in the sole possession of the maker which are not accessible or revealed to any other person except a temporary substitute for the maker of the record.
- 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.
- Records maintained by Doane College if the record is maintained solely for law enforcement purposes, and is revealed only to law enforcement agencies of the same jurisdiction. Such records do not include those created by a law enforcement unit which are maintained by a component of the educational institution other than the law enforcement unit, or records created and maintained by a law enforcement unit exclusively for a nonlaw enforcement purpose such as a disciplinary action or proceeding conducted by the educational institution.
- Medical records maintained by Health Services if the records are used only for treatment of a student and made available only to those persons providing the treatment.
- Postattendance (Alumni) records which contain information about a student after he or she is no longer in attendance at the College and which do not relate to the person as a student.

1B. Types, locations, and custodians of records

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

TYPES	LOCATION	CUSTODIAN
Academic Records	Registrar's Office	Registrar
Admissions Records	Admissions or Registrar's Office	Director of Admissions
Credential Files	Education Office	Chair of Education Department
Disciplinary Records	Registrar or Student Leadership Office	VP of Academic Affairs or VP of Enrollment Management and Student Leadership
Financial Aid Records	Financial Aid Office	Director of Financial Aid
Financial Records	Business Office	Comptroller
Health Records	Health Services	Nurse
Placement Records	Career Services	Director of Career Services
Student Employment Records	Financial Aid or Payroll Office or Supervisor	Payroll Coordinator
Support Services	Academic Support Center	Director of Academic Support Services

1C. Procedure to inspect records

Students may inspect and review their Education Records upon written request to the Registrar, dean, or other appropriate official records custodian, stating as precisely as possible the Education Record or Records he or she wishes to inspect.

The College official 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 in 45 days or less from the 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.

1D. Right to refuse access

Doane College 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 Doane College if that application was denied or the student never attended the College.
- Those portions of Education Records that contain information about other students.
- Those records which are excluded from the FERPA definition of Education Records. An example is a record not maintained by Doane like another institutions transcript.

1E. Refusal to Provide Copies

Doane College reserves the right to deny copies when transcripts or other records are not required to be made available under FERPA. Doane may not provide copies 1) if the student lives within commuting distance of Doane College (50 miles) and can travel to review the records; 2) if the student has an unpaid financial obligation to the College; or 3) if there is an unresolved disciplinary action against the student, unless the failure to provide copies effectively denies the student the right to inspect.

1F. Fee for copies of records

There is a .05 fee per copy for Education Records. Official transcripts are \$5 per copy.

1G. Annual Notification

Students are notified annually of their FERPA rights via catalogs, email, course schedules, and other appropriate communication mediums. An email example is included in *attachment 4*.

2. REQUEST FOR AMENDMENT OF EDUCATION RECORDS

Students have the right to request amendment of records that they believe to be inaccurate, misleading, or in violation of their privacy rights. Following are the procedures for the request for amendment of records:

- A student must complete the *Request to Amend or Remove Education Records (attachment 2)* to the appropriate official records custodian of the record in question.
- Doane College may comply with the request or it may elect not to comply. If the College elects not to comply, the student will be notified in writing of the decision and advised of the right to a hearing to challenge the information believed to be inaccurate, misleading, or in violation of privacy rights.
- Upon completion of the *Request for Formal Hearing to Amend or Remove Education Records* form (*attachment 3*), Doane College will arrange for a hearing, and notify the student, reasonably in advance, of the date, place and time of the hearing.
- The hearing will be conducted by a committee appointed by the Vice President for Academic Affairs. The hearing will be held before an officer or committee with no direct interest in the outcome of the hearing. The student shall be accorded a full and fair opportunity to present evidence relevant to the issues raised in the original request to amend the student's education records. The student may be assisted by one or more individuals, including an attorney.
- Doane College 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.
- If Doane College decides the challenged information is inaccurate, misleading, or in violation of privacy rights, it will amend the Education Record and notify the student, in writing, that the Education Record has been amended.
- If Doane College decides that the challenged information is not inaccurate, misleading, or in violation of privacy rights, the Education Record will stand unchanged. However, the student will be advised of his/her right to place in the Education Record a statement regarding the challenged information and/or a statement setting forth reasons for disagreeing with the decision not to change the Education Record.
- This statement will be maintained as part of the student's Education Record as long as the contested portion is maintained. If the contested portion of the Education Record is disclosed, the statement must be disclosed with it.

Destruction of Records

Nothing in this FERPA policy *requires* the continued maintenance of any Education Record for any particular length of time. However many offices follow a records retention policy. Once a student has requested access to an Education Record, the Record will not be destroyed before the record custodian has granted the student access.

3. DISCLOSURE OF EDUCATION RECORDS

Doane College will disclose information from a student's Education Records only with the written consent of the student, *except* to school officials determined by the College to have a legitimate educational interest.

3A. School officials are those members of an institution who act in the student's educational interest within the limitations of their "need to know." They may include a person employed by the College in an administrative, supervisory, academic or research, or support staff position, including College Security and Student Health staff; a person elected to the Board of Trustees; a person serving on an institutional governing body of the College (such as Honor Societies, Student Government Associations, etc.); a person employed by or under contract to the College to perform a special task (e.g. an attorney or auditor, the National Student Clearinghouse); a person or organization acting as an official agent of the institution and performing a business function or service on behalf of the

institution; a student conducting College business (e.g. serving on an official committee, working for the College, or assisting another school official in fulfilling his or her professional responsibility) and any other person determined by the Vice President of Academic Affairs to have a need to know the information in order to perform his or her administrative tasks, to provide a service or benefit for a student, or to fulfill a legitimate educational interest of the College.

- 3B.** A school official is determined to have **legitimate educational interest** if the information requested is necessary for that official to (a) perform appropriate tasks that are specified in his or her position description or by a contract agreement; (b) perform a task related to a student's education; (c) perform a task related to the discipline of a student; (d) provide a service or benefit relating to the student or student's family, such as health care, counseling, job placement, or financial aid.

In addition to school officials, FERPA outlines other individuals information can be released to.

- To agents acting on behalf of the institution (e.g. clearinghouses, degree/enrollment verifiers).
- To authorized representative designated by the Comptroller General of the United States, Secretary of Education, U.S. Attorney General and state and local educational authorities to have access to your records and personally identifiable information (PII). Authorized representatives are:
 - any third party designated by Authorities to evaluate a federal or state-supported education program. The evaluation may relate to any program that is "principally engaged in the provision of education," such as early childhood education and job training, as well as any program that is administered by an education agency or institution.
 - researchers performing certain types of studies, in certain cases even when Doane objects to or does not request such research. Authorities must obtain certain use-restriction and data security promises from the entities that they authorize to receive a student's PII, but the Authorities need not maintain direct control over such entities.
 - in connection with Statewide Longitudinal Data Systems, State Authorities may collect, compile, student's participation in education and other programs by linking such PII to other personal information about the student that they obtain from other Federal or State data sources, including workforce development, unemployment insurance, child welfare, juvenile justice, military service, and migrant student records systems.
- To Veteran's Administration officials.
- To other schools at which the student seeks or intends to enroll.
- 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.
- To organizations conducting certain studies for or on behalf of the College as long as the study is conducted in a manner that does not permit personal identification of parents and students by outsiders and the information is destroyed when no longer needed for the study.
- To accrediting organizations, including individuals or visiting committees, to carry out their functions.
- To parents of an eligible student who claim the student as a dependent for income tax purposes, provided dependency is substantiated by copies of income tax returns.
- To comply with a judicial order or a lawfully issued subpoena once Doane has made reasonable effort to notify the student of the order or subpoena in advance of compliance so the student may seek protective action, unless it is a federal grand jury or other subpoena which a court has ordered not be disclosed.
- To appropriate parties if a health or safety emergency exists and the information will assist in resolving the emergency.
- To an alleged victim of any crime of violence of the results of any institutional disciplinary proceeding regarding the alleged perpetrator of that crime with respect to that crime.
- To anyone requesting the final results of a disciplinary hearing against an alleged perpetrator of a crime of violence or nonforcible sex offense (Foley Amendment).
- To the Immigration and Naturalization Service (INS) for purposes of the Coordinated Interagency Partnership Regulating International Students.

- To the Internal Revenue Service (IRS) for purposes of complying with the Taxpayer Relief Act of 1997.
- To state and local authorities to whom such information is specifically allowed to be reported or disclosed under state law in connections with the juvenile justice system.
- To comply with a court order obtained under the USA PATRIOT Act of 2001 for education records considered relevant to a terrorism investigation or prosecution, without advance notice to the student.
- The College retains discretion to disclose to a student's parents information regarding any violation of law or of College rule or policy as to alcohol or controlled substances use or possession, if the student is under age 21 at the time of the disclosure and the College determines that such alcohol/drug use or possession constitutes a disciplinary violation (Warner Amendment).

3C. Consent for the Disclosure

Consent for the disclosure of a student's Education Record can be achieved by completing the *Consent to Release Information Form (attachment 1)* indicating to whom the records are to be disclosed.

3D. Record of Disclosures

Except where not required under FERPA regulations (34 CFR 99.33) (e.g. disclosures of directory information, disclosures pursuant to court order under the USA PATRIOT Act), the College will inform all third parties to whom personal information from a student's Education Record is released that no further release of such information is authorized without written consent of the student. Doane College will maintain a record of third parties who have requested or obtained access to Educational Records and/or disclosure of such information from a student's Education Records (not including parties seeking directory information, parties having student consent, circumstances involving certain grand jury subpoenas, and disclosures pursuant to court order under the USA PATRIOT Act). 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. This record of access, to be kept with the Education Records, is available only to the student and the custodian(s) of the Education Record.

3E. Directory Information

Doane College has designated the following categories of student information as public or Directory Information:

- Name
- Addresses: permanent, campus, local (off-campus), and email
- Associated telephone numbers
- Hometown and high school attended
- Major and/or minor fields of study
- Degree sought
- Expected date of completion of degree requirements and graduation
- Degrees conferred
- Awards and Honors (e.g. Dean's list)
- Full or part time enrollment status
- Dates of attendance
- Previous institutions attended
- Participation in officially recognized activities and sports
- Weight and height of athletic team members
- Photograph

The College may disclose any of these items at its discretion, without prior written consent unless notified in writing not to disclose (*attachment 5*). Requests for nondisclosure by the student are in effect from the date received in writing from the student until rescinded in writing by the student.

While the above directory information can be released, Doane College is very cautious and releases limited information to internal and external constituents.

4. COMPLIANCE

Students are encouraged to contact the Registrar, Padour Walker Administrative Building, ext. 8556, email address registraroffice@doane.edu with questions or complaints about this Policy. If they have questions or concerns about this policy, under FERPA, students have the right to contact the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 202024605, email address: ferpa@ed.gov, with a complaint about the College's compliance with FERPA.

Original 11/84 Updated 2/08; 8/12

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA)

Attachment 1

The Family Educational Rights and Privacy Act (FERPA) is federal legislation governing access to, amendment of and disclosure of student education records. FERPA provides that education records cannot be disclosed without the student's written consent. However, federal law permits Doane College to notify parents of students under the age of 21 of the student's alcohol violations.

Education records means those records directly related to the student and maintained by Doane College and include but are not limited to, academic, disciplinary, personal, financial and extracurricular records. In order for school officials to discuss your education records with parents or any other non-school official, you must complete, sign and date the **Consent to Release**.

For more information on FERPA, please contact the Registrar's office.

**FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT
CONSENT TO RELEASE**

I (*print name*) _____ ID/SS#: _____
HEREBY AUTHORIZE DOANE COLLEGE to release my education records to the individual(s) listed below.

Student Signature _____ Date: _____
Your Consent to Release expires upon graduation or two consecutive terms of non-enrollment. Changes can be made with a written request to the Registrar's Office.

Please print below to whom we can release information e.g. parents, spouse, grandparents, custodian, etc.

_____		_____	
First Name		Last Name	
_____		_____	_____
Address		City	State Zip
_____	_____	_____	
Home Phone	Business Phone	Cell Phone	
_____		_____	
E-mail Address	Relationship to student		

_____		_____	
First Name		Last Name	
_____		_____	_____
Address		City	State Zip
_____	_____	_____	
Home Phone	Business Phone	Cell Phone	
_____		_____	
E-mail Address	Relationship to student		

Additional names may be written on the back of this form. Please include the additional information requested above.
Return this form to the Registrar's Office in the Padour-Walker building.



Request to Amend or Remove Education Records

Last Name (Student)	First Name	Student Identification Number
Address	Telephone (Local/On-Campus)	
City, State, Zip		

I have reviewed my education records held within Doane College. I am not satisfied with the accuracy and/or completeness of these records. Specifically, I request that these records be amended in the following way(s).

I request that the following document(s) be removed from my file:

Date	Student Signature
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Record Custodian Reviewing Request to Amend Education Record

Last Name (Custodian) First Name	Disposition of Request
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Title	Date
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Reason for Approval/Disapproval

Date	Custodian Signature
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Appeals of the Record Custodian decision may be made by completing a "Student Request for Formal Hearing" form. This form is available from the Registrar's Office.

The Records Custodian must send a copy of this form to the student making the request.



Request for Formal Hearing to Amend or Remove Education Records

Last Name (Student) First Name

Student Identification Number

Address

Telephone (Local/On-Campus)

City, State, Zip

I request a formal hearing concerning correction or removal of what I believe to be inaccurate or misleading information contained in my education records. The following education record(s) is/are being contested:

I am contesting the information because:

Please notify me of the date, time, and place of the hearing.

Date

Student Signature

The decision of the Hearing Panel is as follows:

Last Name (Chairperson) First Name

Date

Chairperson's Signature

Note: If the student disagrees with the Hearing Panel's decision, he/she has the right to place in his/her record a written statement commenting on the information in the record and/or stating his/her reasons for disagreeing with the decision. This explanation will become part of the student's education record as long as this record is maintained and whenever a copy of this record is sent to any party, the explanation will accompany it.

The chairperson of the Hearing Panel must send copies of the Panel's decision to the student requesting the hearing, and to the Registrar's Office.

From: Registrar's Office
Sent: Annually
To: ALL STUDENTS
Subject: Notification of Rights under FERPA

Know Your Rights!

Fall Semester FERPA Notification

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

- (1) The right to inspect and review the student's education records within 45 days of the day Doane College receives a request for access.
- (2) The right to request the amendment of the student's education records that the student believes is inaccurate, misleading, or otherwise in violation of the student's privacy rights.
- (3) The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.

At its discretion, Doane College may provide "directory information." Directory information is defined as information which would not generally be considered harmful or an invasion of privacy if disclosed. Designated directory information at Doane College includes the following:

- Student's name
- Addresses: permanent, campus, local (off-campus), and email
- Associated telephone numbers
- Hometown and high school attended
- Major and/or minor fields of study
- Degree sought (Bachelor of Arts, Bachelor of Science)
- Expected date of completion of degree requirements and graduation
- Degrees conferred
- Awards and Honors (e.g. Dean's list)
- Full or part time enrollment status
- Dates of attendance
- Previous institutions attended
- Participation in officially recognized activities and sports
- Weight and height of athletic team members
- Photograph

While the above directory information *can* be released, Doane College is very cautious and releases limited information to internal and external constituents.

Students who wish to block the public disclosure of directory information (all or in part) should notify the Registrar's Office by the **2nd Wednesday of the Semester**, and complete the necessary form.

- (4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by Doane College to comply with the requirements of FERPA.

For additional information and Doane's complete FERPA policy please visit the Registrar web page at:
http://www.doane.edu/About_Doane/Offices/Registrar/FAQ/23739/

Request for Non-Disclosure of Directory Information

At its discretion Doane College may provide directory information in accordance with the provisions of the *Family Educational Rights and Privacy Act*. Directory information is defined as that information which would not generally be considered harmful or an invasion of privacy if disclosed. Designated directory information at Doane College includes the following: student name, address (permanent, campus, local, email), telephone numbers, hometown and high school attended, major and/or minor fields of study, degree sought (Bachelor of Arts, Bachelor of Science), expected date of completion of degree requirements and graduation, degrees conferred, awards and Honors (e.g. Dean’s list), full or part time enrollment status, dates of attendance, previous institutions attended, participation in officially recognized activities and sports, weight and height of athletic team members, and photograph.

Students may withhold directory information by completing this form; please note that such withholding requests are binding for all information to all parties including those other than for education purposes. Students should consider all aspects of a directory hold prior to filing such a request. Although the initial request may be filed at any time, requests for non-disclosure will be honored by the College until removed by the student.

Please consider very carefully the consequences of any decision by you to withhold any category of directory information. Such designation will call for Doane College not to release any or all of this directory information; any future requests for such information from non-institutional persons or organizations will be refused.

Doane College will honor your request to withhold any of the categories listed below but cannot assume responsibility to contact you for subsequent permission to release them. Regardless of the effect upon you, Doane College assumes no liability as a result of honoring your instructions that such information be withheld.

Please mark the appropriate boxes and affix your signature below to indicate your disapproval for the institution to disclose the following directory information:

- | | |
|--|--|
| <input type="checkbox"/> student name | <input type="checkbox"/> degrees conferred |
| <input type="checkbox"/> permanent address | <input type="checkbox"/> awards and Honors (e.g. Dean’s list) |
| <input type="checkbox"/> campus address | <input type="checkbox"/> full or part time enrollment status |
| <input type="checkbox"/> local address | <input type="checkbox"/> dates of attendance |
| <input type="checkbox"/> email address | <input type="checkbox"/> previous institutions attended |
| <input type="checkbox"/> telephone numbers, | <input type="checkbox"/> participation in officially recognized |
| <input type="checkbox"/> hometown | activities and sports |
| <input type="checkbox"/> high school attended | <input type="checkbox"/> weight and height of athletic team |
| <input type="checkbox"/> major and/or minor fields of study | members |
| <input type="checkbox"/> degree sought (BA, BS) | <input type="checkbox"/> photograph |
| <input type="checkbox"/> expected date of completion of degree | <input type="checkbox"/> all directory information listed above |
| requirements and graduation | |

Student Name

Date

Student Signature

Copy to student and student file

Annual FERPA Notification

Students' rights under the Family Educational Rights and Privacy Act (FERPA) include 1) access to education records; 2) request for amendment of education records; 3) disclosure of education records, including directory information, and; 4) compliance. For more information on FERPA, and to see Doane's FERPA Policy, please visit the Registrar's web page on the Doane website. Questions and concerns can be sent to the Registrar, Denise Ellis, at registraroffice@doane.edu or 402-826-8251.

Doane Lincoln, Grand Island, UG and MAM Autumn Schedule
MED each semester
MAC Yearly Schedule

Catalog, Web Site, Handbook Wording

FERPA

Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Acts of 1974 (commonly referred to as "FERPA" or the "Buckley Amendment") is designed to protect the confidentiality of students educational records and to give students access to their records to assure accuracy. FERPA outlines four rights with respect to students Education Records. They are:

1. **ACCESS TO EDUCATION RECORDS:** students have the right to inspect and review their Education Records within 45 days of the day the College receives a written request for access, anytime after their matriculation.
2. **REQUEST FOR AMENDMENT OF EDUCATION RECORDS:** students have the right to request amendment of Education Records if they believe the records are inaccurate, misleading or in violation of their privacy rights.
3. **DISCLOSURE OF EDUCATION RECORDS:** this right protects confidentiality of student records and requires the student's signature to release academic records, such as transcripts. Some exceptions exist such as school officials who've been determined to have a legitimate educational interest, or information determined to be directory information. Examples of directory information include: name, addresses, email, telephone numbers, major and/or minor fields of study, degree sought, expected date of completion of degree requirements and graduation, degrees conferred, awards and honors (e.g. Dean's list), full or part time enrollment status, dates of attendance, or photograph.
4. **COMPLIANCE:** students have the right to submit complaints concerning the College's compliance with the requirement of FERPA to the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Ave., S.W., Washington, DC 202024605, email address: ferpa@ed.gov,

For more information on FERPA, and to see the entire FERPA Policy, please visit the Registrar's web page on the Doane website. Questions and concerns can be sent to the Registrar at registraroffice@doane.edu or 402-826-8251.