

CONNECTICUT COLLEGE POLICY STATEMENT
ON EDUCATION RECORDS OF STUDENTS

Pursuant to the Family Educational Rights to Privacy Act of 1974

Office of the Registrar
Updated September 2017

I. Summary of Statement

Connecticut College has a long-standing policy of preserving the confidentiality of student records. This statement confirms and renews this policy in accordance with the terms of the Family Educational Rights and Privacy Act of 1974, as amended (the Buckley Amendment) and the federal regulations that implement it (hereafter referred to as the "Act"). The statement has two chief purposes. The first is to describe the nature of a student's right to review his or her education records; the second is to describe the College policy on confidentiality in the maintenance and disclosure of personally identifiable information (PII) from education records.

II. Definitions

For the purpose of this policy, "student" means any individual who is or who has been enrolled in Connecticut College and regarding whom the College maintains education records. The term does not include a person who applied for admission, but who never enrolled at the College.

College records subject to the Act (hereafter referred to as "education records" as that term is defined in the Act) include those records maintained by or on behalf of the College relating directly to a student or former student, but do not include the following:

1. records maintained by faculty members or supervisory administrative personnel for their own use, which are in their sole possession and are not available or revealed to other parties;
2. grades on peer-graded papers before they are collected and recorded by the instructor;
3. records created and maintained by the Campus Safety Department and used for law enforcement/security purposes;
4. records made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional or paraprofessional capacity that are made, maintained or used only in connection with treatment of students and disclosed only to individuals providing the treatment;
5. employment records of students that are maintained in the normal course of business that relate exclusively to their employment and are not available for any other use, except those records pertaining to students employed through the "College Work/Study Program" or as a result of their status as students;
6. records containing only information relating to a person after that person has ceased to be a student, such as information concerning the accomplishments of alumni.

“Personally identifiable information” or “PII” includes, but is not limited to the student’s name; the name of the student’s parent or other family members; the address of the student or student’s family; a personal identifier, such as the student’s social security number, student number, or biometric record; other indirect identifiers, such as the student’s date of birth, place of birth, and mother’s maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.

Directory information means information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed.

(a) Directory information includes, but is not limited to, the student’s name; address; telephone listing; electronic mail address; photograph; date and place of birth; major field of study; grade level; enrollment status (*e.g.*, undergraduate or graduate, full-time or part-time); dates of attendance; participation in officially recognized activities and sports; weight and height of members of athletic teams; degrees, honors, and awards received; and the most recent educational agency or institution attended.

(b) Directory information does not include a student’s—

(1) Social security number; or

(2) Student identification (ID) number, except as provided in paragraph (c) of this definition.

(c) In accordance with paragraphs (a) and (b) of this definition, directory information includes—

(1) A student ID number, user ID, or other unique personal identifier used by a student for purposes of accessing or communicating in electronic systems, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user’s identity, such as a personal identification number (PIN), password or other factor known or possessed only by the authorized user; and

(2) A student ID number or other unique personal identifier that is displayed on a student ID badge, but only if the identifier cannot be used to gain access to education records except when used in conjunction with one or more factors that authenticate the user’s identity, such as a PIN, password, or other factor known or possessed only by the authorized user.

III. Annual Notice

Each year, the College will inform students of their rights under the Act and the federal regulations published under the Act, and relevant College policy. The Annual Notice can be found in the Student Handbook and on the College web site. It is also appended to the end of this Policy Statement.

IV. Inspection and Review

A. Scope

The College permits students to inspect and review their education records to the full extent permitted by the Act, using the procedures set forth below. With limited exceptions, students have a right under the Act to review their education records, to seek amendment of records they believe are inaccurate, misleading or violative of their rights, and to prevent disclosure of personally identifiable information contained in their records.

B. Types of Education Records and Locations

Education records are maintained on students at various locations within the College. Following is a list of the types and locations of education records maintained by the College and the title of the officials responsible for the maintenance of those records.

1. Academic Records of Undergraduates, Return to College Students, and Special Students

Office of Admission. The only application information retained by the Office of Admission is data used for follow-up and validity studies.

In the case of first-year students, the admission file is sent to the Office of the Dean of the College and to the Office of the Registrar. In the case of transfer, Return to College and prematriculant Special Students, the admission file is sent directly to the Office of the Registrar. The admission file consists of the following items: an application form and supplementary information prepared by the student, results of standardized tests, transcripts from the secondary school, and transcripts from other colleges and universities attended.

All other admission material is destroyed at the conclusion of each cohort's recruitment cycle, just prior to the start of each semester.

Office of the Registrar. The Office of the Registrar creates a file for each enrolled undergraduate degree-seeking student. During the course of the student's enrollment at the College, items may be added to the file. Such items include transcripts from summer school or study-away programs; copies of committee actions; copies of correspondence addressed to the student or sent on his/her behalf; Add/Drop/Withdrawal and Satisfactory/Unsatisfactory forms; and miscellaneous file notes and other material pertaining to the student's academic progress.

In addition, the Office of the Registrar also maintains records for those part-time Special Students who fall under the jurisdiction of the Registrar.

Because of storage constraints, student records maintained by the Office of the Registrar are not kept indefinitely; it is the policy of the office to destroy files 10 years after receipt of the degree, or 10 years after matriculation for inactive students who do not obtain a degree. For additional information about the College's Records Management policy, please see: <http://www.conncoll.edu/media/website-media/is/briefing-book/Records-Management.pdf>

Official transcripts are maintained by the Office of the Registrar for any student who enrolled in courses at the College. Official transcripts are kept in perpetuity. Additional records include self-scheduled

examination receipt forms, which are kept for two semesters. Changes of grade, submitted by the faculty, are also retained.

Also on file, although maintained separately from the admission folder, are miscellaneous endorsement forms, which require the Registrar's signature. These include forms for the Veterans Administration, state vocational rehabilitation assistance, scholarship awards from colleges and universities, and other types of scholarships from state, federal, or private agencies.

Office of the Dean of the College. For advisory purposes, the Office of the Dean of the College retains digital copies of transcripts and common applications which are received electronically via a shared drive from the Admissions Office.

The Office of the Dean of the College enters electronically into Maxient any additional documents and correspondence pertaining to the student's academic work and status at the College.

Also on file in the Office of the Dean of the College are folders containing copies of Sevis I20 forms for F-1 students who are enrolled at the College.

Upon the student's graduation from the College, the Office of the Dean of the College will transfer to the file in the Office of the Registrar all documents and correspondence contained in the dean's folder.

The Academic Resource Center. The Academic Resource Center maintains records pertaining to the student's access to resources such as learning strategy coaching, access to peer tutoring, assistance with research and thesis writing, time management, and other relevant study and learning strategies.

The Office of Student Accessibility Services. The Office of Student Accessibility Services maintains records pertaining to the student's disability needs and reasonable accommodations.

The Office of Study Away. The Office of Study Away also maintains records pertaining to the student's application for study abroad programs or other study away programs.

Dean of Students. The Dean of Students maintains records on student housing and on disciplinary action relating to the student.

The following is a list of titles and addresses of College officials responsible for these records:

Dean of Admission & Financial Aid
Horizon Admissions Building

Dean of the College
Fanning Hall

Registrar
Fanning Hall

Dean of First-Year Students/Dean
of Sophomores/Dean of Juniors,
Seniors & Transfers/Associate Deans
Fanning Hall

Dean of Students
Crozier-Williams

Director of Study Away
Fanning Hall

Dean for Academic Support/Director,
Academic Resource Center
Shain Library

Director of Student
Accessibility Services
Shain Library

2. Academic Records of Graduate Students: The Office of the Registrar maintains the records on graduate students enrolled at Connecticut College. In addition, department chairpersons maintain records on graduate students enrolled in their individual departments. Upon acceptance of a graduate student, the student's application and related material remain in the Office of the Registrar. For most departments, the Office of the Registrar sends a copy of the student's application and relevant transcripts to the chairperson of the department in which the student is enrolled. The Office of the Registrar maintains the student records, as well as the student's transcript of other college grades and additional documents. Correspondence pertaining to the student's academic work or to the student's status within the College that must be presented for action by the Academics and Administrative Procedures Committee remains in the Office of the Registrar. Upon completion of the course of study, the student's file remains in the Office of the Registrar. Because of storage constraints, student records maintained by the Office of the Registrar are not kept indefinitely; it is the policy of the office to destroy files 10 years after receipt of the degree, or 10 years after matriculation for inactive students who do not obtain a degree. For additional information about the College's Records Management policy, please see: <http://www.conncoll.edu/media/website-media/is/briefing-book/Records-Management.pdf>

3. Student Career Development Files: With the implementation of the current system in August of 2014, the Office of Career and Professional development maintains records related to student appointments which are created and maintained by Career Advisers. Documents related to job/internship and graduate school applications (such as resumes, cover letters, and personal statements) are voluntarily uploaded by the student. Additional documents and correspondence may be voluntarily maintained and shared with relevant partners (such as the student's Class Dean) who have a legitimate educational interest in having access to those documents in the course of their relationship with the office to support their pursuit of internship funding received by the College.

Student files are maintained by the Senior Director, Office of Career and Professional Development, Vinal Cottage, Connecticut College.

4. Financial Records: Financial records are maintained by the Controller in the Office of Accounting, Fanning Hall, Connecticut College. They consist of records of students' accounts and loans, as well as some information related to student internships and student award information.

5. Financial aid records: for students are maintained by the Director, Office of Financial Aid Services, Larrabee Annex, Connecticut College.

Financial aid records for students consist of the application for financial aid, financial statements submitted by students and/or their parents, the College's analysis of the applications, letters to and from the student and/or parents concerning financial aid, loan documents detailing the type, amount and interest rate of loans, financial aid awards, affidavits and other related documents.

6. Student Employment Records: Student employment records are maintained by the Office of Financial Aid.

Certain information maintained in the record of various College officials mentioned above is also stored in the College's computer information systems. Such information is solely under the control of the official responsible for the records.

C. Procedure for Inspection and Review:

Any student who wishes to inspect and review his or her education records must make the request in writing to the official responsible for maintaining the records in question. Within a reasonable time after receipt of the request, not to exceed forty-five days, the responsible official will make the records sought available for review and advise the student of the time when and place where the records may be reviewed. The opportunity to inspect and review education records will be confined to normal business hours on days when the College is open. At the time of review, the official responsible for the records or a member of his or her staff will be available to respond to request to explain the records. Students have the right to review only their own education records. When a record includes information about other students, that information will not be disclosed.

D. Copies of Records:

The student's right to inspect and review his education records does not automatically entitle the student to a copy of the records reviewed, although the student may make handwritten notes while reviewing the records.

1. Grade Reports. At the end of each semester, students may access an electronic version of their academic history, containing their grades, through Self-Service Banner (SSB). If a report of grades is to be mailed to a third party (except where state and federal law required a grade report as a condition for receiving financial assistance), the student must sign a release for a transcript to be sent. In the event the student owes tuition or other charges to the College, the College reserves the right to withhold the transcript.
2. Transcripts. The Office of the Registrar is responsible for the issuance of transcripts. A student must put in writing the name and address of a party who is to receive the transcript. Each original request for a transcript must be received, in writing, from the student. The College reserves the right to withhold transcripts if the student has outstanding bills.

For students no longer enrolled in the College, there is a \$5.00 fee for each transcript ordered.

3. Other educational records. The College reserves the right to refuse to make copies of education records, including transcripts for personal use, if the student lives within reasonable commuting distance of the College and if the student is physically able to travel to the campus to review the records. Students unable to view their records in person must submit written requests for copies of other education records to the official responsible for the records, and the request must specify the records to be copies. The official responsible will respond to the request within a reasonable time, not to exceed 45 days.

Copies will be provided at the expense of the student. At present the charge for copies will be \$0.25 per page. If the student can demonstrate that the ultimate costs would effectively prevent him or

her from exercising the right to inspect and review the records, copies will be provided free of charge.

E. Limits on Inspection and Review:

No student will be given access to the following records:

1. Financial records, including any information contained therein, of the student's parents, unless the student's parents have explicitly permitted such access.
2. Confidential letters or statements of recommendation placed in the education records of students before January 1, 1975, with the author's understanding that they were confidential, as long as the letters or statements have been used only for the purpose for which the author wrote them. Such records will remain confidential unless the author directs otherwise.
3. Confidential letters or statements of recommendations placed in the education records of a student on or after January 1, 1975, that are related to the student's admission to an educational institution, application for employment, or the receipt of honors and prizes, if the student has signed a written waiver of his or her right to inspect and review those letters and statements. Waiver of the right to inspect such letters or statements is not required as a condition of admission to any service or benefit of the College. A student who has provided such a waiver will, upon request, be notified of the name of each person who has submitted such a confidential letter or statement. The College will use the letters or statements only for the purpose for which they were written. A student may revoke, in writing, a waiver of the right to inspect such letters or statements, and the revocation will be effective as to any actions taken after the revocation.

F. Access Only to Personal Records:

Students have a right to review only their own education record. Should education records contain information on more than one student, a student may inspect and review only the specific information relating to him/herself.

G. Destruction of Records:

The Act and the federal regulations do not change previous laws or College policies governing the destruction of records except to preclude destruction where there is an outstanding request to inspect and review the records covered by the Act. The College reserves the right to destroy education records as provided by law.

V. Amendment of Educational Records

The College will provide a student who believe that information contained in his or her education records is inaccurate, misleading, or violated his or her privacy or other rights, with an opportunity to seek correction of his or her education records.

A student who wishes to challenge part of his or her education records should first discuss the matter with the College official exercising control over the record.

If the challenge can be resolved through informal discussion, the student's record will be amended within seven days of the meeting with the College official.

If the challenge cannot be resolved through informal discussion within seven days of the request, the student should submit a written request for amendment to the Dean of Students explaining the basis for the request. Within seven days of this formal request, the Dean shall notify the student of his or her decision whether to amend the education record at issue.

If the outcome is satisfactory to the student, the student's record will be amended within seven days of the Dean's decision.

If the outcome is unsatisfactory to the student, the student may submit a written request for a hearing to the Dean of the College Community. (Please note that a hearing may not be requested to contest an assigned grade).

The Dean of the College or the person designated by the Dean of the College will hold a hearing within a reasonable time, not to exceed 45 days after receipt of the hearing. The student will be given notice of the date, place and time of the hearing not fewer than ten days before the hearing. The hearing will be conducted by the Dean of the College or a designee who does not have a direct interest in the outcome of the hearing. In accordance with applicable federal regulations, the student will be entitled to present evidence at the hearing and be assisted by individuals of his or her choice, including an attorney, at his or her own expense. A written decision, based on the evidence presented at the hearing, will be issued within 30 days of the conclusion of the hearing. The decision shall include a summary of the evidence and reasons for the decision. This decision will be the College's final decision.

If, as a result of the hearing, the College decides that the information is inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, the student's record will be amended accordingly within seven days of the College's final decision, and the student will be notified of the amendment in writing.

If, as a result of the hearing, the College decides that the information is not inaccurate, misleading or otherwise in violation of the privacy or other rights of the student, the student may place in his or her education record a statement commenting upon the information in the education records and/or setting forth any reasons for disagreeing with the decision of the College. This statement will become part of the education record and will be disclosed whenever the contested portion of the education record is disclosed.

VI. Campus Sex Crimes Prevention Act and Related FERPA Amendments

- A. FERPA does not prevent educational institutions from disclosing such information provided to the institution under 170101 of the Violent Crime Control and Law Enforcement Act of 1994 (42. U.S.C. 14071) concerning registered sex offenders who are required to register under that section.
- B. Individuals seeking information about registered sex offenders that has been provided to the state (pursuant to 42. U.S.C. § 14071 (j)) may contact the Campus Safety official at ext. 2251

VII. Disclosure of Personally Identifiable Information from Education Records

- A. The College will not disclose to any third party personally identifiable information from the education record of a student, without the student's prior written consent. FERPA allows certain types of information, as described below, to be disclosed without the student's consent.
1. As a public service, the College may disclose directory information, which is defined as information, concerning present and former students, that would not generally be considered harmful or an invasion of privacy if released. The following types of directory information may be disclosed at the College's discretion, without student's prior written consent:
 - the name of a student who is or has been in attendance;
 - dates of attendance and class year;
 - the enrollment status of the student (on campus, study away, not on campus);
 - the local address and telephone number;
 - the cell phone;
 - the date and place of birth;
 - the major field of study; participation in College-sponsored extracurricular activities and athletics;
 - the height and weight of members of athletic teams;
 - degrees and awards received;
 - the most recent previous educational institution attended;
 - student photo ID images;
 - E-mail address

A student may refuse to permit the designation as directory information of the personally identifiable information listed above. A signed request must be made to the Registrar of Connecticut College on official forms available from the Office of the Registrar by the first day of classes each semester, as defined on the academic calendar. In the absence of receipt by the Registrar of such a request, it will be assumed that the above information may be disclosed for the current academic year. If a student chooses to withhold information from public disclosure, the College will follow the student's directive unless or until the student notifies the Office of the Registrar that the information may be disclosed.

2. The College may disclose personally identifiable information without the prior written consent of the student to other College officials, including faculty members, who, in the opinion on the College, are determined to have legitimate educational interests in the information.

The term "College Official" means a person employed as an administrator, supervisor, instructor, or support staff member (including health or medical staff and law enforcement unit personnel); a person or company the College has appointed or contracted to perform a special task (such as an attorney, accountant, auditor, medical consultant, or therapist); or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official for the limited purpose of fulfilling their committee responsibilities.

An official has a “legitimate educational interest” if he or she needs the information to fulfill his or her professional responsibilities or duties for the College. This includes any interest related to the student’s education, discipline, a service or benefit for the student, the evaluation of a student’s academic work, maintenance of campus safety and security, and any action or interest relating to the planning or execution of the College’s academic, administrative, employment or financial programs.

3. The College may provide personally identifiable information without prior student consent 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. Disclosures under this provision may be made 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.
4. In connection with financial aid for which a student has applied or which a student has received, the College may disclose personally identifiable information without prior student consent for the purpose of determining eligibility for, or the amount or conditions of financial aid and for the purpose of enforcing the terms and conditions of financial aid.
5. The College may at its discretion release personally identifiable information without prior student consent to parents or guardians of a dependent student, as defined in section 152 of the Internal Revenue Code of 1986, but generally such disclosure will be limited to information about a student’s official status at the College.
6. The College may disclose personally identifiable information without the prior written consent of the student in order to comply with a judicial order or lawfully issued subpoena. Before such compliance, the College will make reasonable effort to notify the student of the order or subpoena, except in the case of a grand jury or law enforcement subpoena that bars such notification.
7. The College may disclose personally identifiable information without prior written consent of the student to appropriate parties in a health or safety emergency, if knowledge of the information is necessary to protect the health or safety of the student or other individuals.
8. The College may disclose personally identifiable information without prior written consent of the student to accrediting organizations as necessary and to organizations conducting studies for the purpose of validating or administering predictive tests, administering student aid programs, or improving instruction, provided, however, that the studies are conducted in a manner which will not permit disclosure of personally identifiable information by persons other than the representatives of the organizations who have a legitimate interest in the information, that the information will be destroyed when no longer needed for the purposes for which the study was conducted, and that the organizations have entered into a

- written agreement with the College specifying the purpose, scope and duration of the studies and the information to be disclosed, and requiring the organization to conduct the studies in accordance with the conditions noted above. Any official responsible for education records who is asked to transmit personally identifiable information of this sort should obtain the advice of the Registrar.
9. The College may disclose, without the student's prior written consent, personally identifiable information from the student's education records, including the student's disciplinary records, to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll or is already enrolled, provided that the disclosure is for purposes related to the student's enrollment or transfer. The College will make a reasonable attempt to notify the student, unless the disclosure is initiated by the student, and will give the student, upon request, a copy of the record that was disclosed and, upon request, an opportunity for a hearing.
 10. If the College initiates legal action against a parent or student, it may disclose, to the court, without student consent, the education records of the student that are relevant to proceed with the legal action. If a student initiates legal or administrative action against the College, the College may disclose to the court or administrative agency, without student consent, the student's education records that are relevant for the College to defend itself.
 11. The College may disclose without student consent the final results of a disciplinary proceeding conducted by the College concerning a crime of violence or non-forcible sex offense to a victim of the alleged perpetrator of the crime, regardless of whether the College concludes that a violation was committed.
 12. The College may disclose without student consent the final results of a student disciplinary proceeding concluded or after October 7, 1998, including the student's name, the violation committed, and any sanction imposed, if it determines that the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and with respect to the allegation made against him or her, the student has committed a violation of the institution's rules or policies. The College will not disclose the name of any other student, including a victim or witness, without the prior written consent of the other student.
- B. In all other cases, the College will obtain the prior written consent of the student before disclosing to a third party personally identifiable information from the student's education records. This written consent must be signed and dated by the student giving the consent and shall specify the records to be disclosed, the purpose of the disclosure, and the parties to whom the disclosure may be made. Upon request, the College shall provide to the student a copy of the record disclosed to the third party.
 - C. Except for the disclosure of directory information, the College shall inform the party to whom a disclosure of personally identifiable information from the education record of a student is made that

no further disclosure of such information shall be made without written consent of the student. For this purpose the following written statement (or one of similar nature) will accompany the disclosure of personally identifiable information:

“Federal law provides that personal information about a student may be released outside of the College only on condition that the party receiving the information not permit further disclosure of the information without the written consent of the student.”

VIII. Record of Disclosures

The College will maintain a record of requests for access to education records and of disclosures of personally identifiable information from education records and the reasons for such disclosure, as required by law, including the parties who requested or received the information and the legitimate interests they had in the information. A record will not be kept of requests or disclosures in the following instances:

1. requests by or disclosures to a student;
2. if there is a written consent of a student when the consent specifies the parties to whom disclosure is to be made;
3. requests by or disclosure to the College and school officials with a legitimate educational interest in the information, under section VI (A) (2) above;
4. requests for or disclosure of directory information under section VI (A) (1) above;
5. requests for or disclosure of information pursuant to a federal grand jury or law enforcement subpoena with an order that the subpoena or response to the subpoena not be disclosed.

This record of requests and disclosures may be inspected by the student, a College official (or the staff of such an official) responsible for the custody of the records, and other parties entitled to review education records.

IX. Complaints

A student has the right to file a complaint concerning alleged failures by the College to comply with the requirements of the Act and the applicable regulations. Complaints may be submitted in writing to: The Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Ave. S. W., Washington, D.C. 20202-5920.

X. Availability of Policy Statements and Regulations

A copy of this policy statement may be obtained from the Office of the Registrar, 105 Fanning Hall. The Office of the Registrar will also have a copy of the Act and the federal regulations available for the inspection of the student. A copy of this policy statement shall be available for review at the office of each of the officials responsible for education records and may also be found here:

<http://www.conncoll.edu/academics/registrar/ferpa/>

XI. Inquiries

Inquiries concerning the statement should be addressed to the Office of the Registrar, located at 105 Fanning Hall.