



ADMINISTRATIVE PROCEDURE

CATEGORY: **Student, Records**

SUBJECT: **Access to, Release of, and Confidentiality of
Nondirectory-Type Student Information**

A. PURPOSE AND SCOPE

1. To outline administrative procedures governing access to and confidentiality of centralized automated student data (personal and scholastic).
2. **Related Procedures:**
 - Inquiries, complaints, and access to records 9010
 - Integrated Technology Support Services information and security5700
 - Integrated Technology Support Services service requests 5705
 - Release of directory-type student information 6525
 - Records for students with disabilities receiving special education (special instructions) 6526
 - Research projects involving the district—advanced degrees 4930
 - Cumulative record keeping, K–6 6505
 - Cumulative record keeping, 7–12 6510
 - Student records, retention and destruction 6520
 - Court orders to seal records 6521
 - California Confidential Address Program (CAP) 6529
 - Counselor confidentiality 6528
 - Use of legal or assumed name 6535
 - Health records 6515

B. LEGAL AND POLICY BASIS

1. **Reference:** Board policy: B-3700, F-6000, G–8000, H–8900, K-1500; Education Code sections 45345, 49060-49079, 49558, 51512; Federal General Education Provisions Act, 20 U.S. Code 1232g; Government Code sections 6205 *et seq*; No Child Left Behind Act; AB 1636, Chapter 321, 2004.
2. **California Confidential Address Program.** If a parent or student indicates that he/she is a participant in the California Confidential Address Program (Cal CAP) during the registration process, refer to Procedure 6529 prior to the beginning of the registration process (Government Code sections 6205 *et seq.*).
3. **The Family Educational Rights and Privacy Act of 1974 (FERPA)** outlines requirements and limitations governing release of student information by school districts receiving federal funds; violations can result in withholding of such funds. The primary rights of parents/guardians under FERPA are:
 - a. The right to inspect and review education records.

- b. The right to seek to amend education records.
- c. The right to have some control over the disclosure of information from education records.

These rights transfer to the student when the student turns 18 or attends a post-secondary institution (C.6.b.).

- 4. **Authorization to Access Database.** Any person, office, or school site desiring access to the district student database must obtain prior authorization from the department having authority to grant such access. The initiator of a request for access must have approval for the request by a district manager in a position appropriate to assume control and/or authority over others who may use these data. Permission to access data does not permit the requestor to share or otherwise distribute such data to any other individual or entity without prior approval.

Note: Employees are granted access to nondirectory-type student information as needed to fulfill their job responsibilities. Similarly, outside consultants who have current signed district nondisclosure agreements may also be accorded access to data, within the parameters of the nondisclosure agreements.

- 5. **Transfer of Student Records**

- a. Whenever a student transfers from one school district to another district or to a private school, or transfers from a private school to a school district within the state, the student's permanent record or a copy thereof shall be transferred by the former district or private school upon a request from the district or private school where the student intends to enroll (Education Code section 49068).

Note: Student records of a transferring student shall not be withheld from the requesting district because of any charges or fees owed by the student or his/her parent/guardian (California Code of Regulations, Title 5, section 438).

- b. When a student transfers from one district school to another school within the district, the student's entire records shall be transferred upon request by the school where the student intends to enroll. Records shall not be withheld because of any fees or charges owed by the student or his/her parent/guardian.
- c. Disposition of records for a student whose whereabouts are unknown is addressed in Procedure 6520.

- d. Records for a student who leaves a district school and for whom no request has been received by another school shall be maintained intact.
6. **Free and Reduced-Price Meals Status.** Applications and records concerning individual students' free or reduced-price meal eligibility shall be confidential. Individual records may not be used for purposes other than administering meal programs, except by authorized district employees for the purpose of disaggregating academic achievement data, and to identify pupils eligible for public school choice and supplemental services as required by No Child Left Behind Act (Education Code section 49558).

C. GENERAL

1. **Originating Office.** Suggestions or questions concerning this procedure should be directed to the Office of Accountability.
2. **Definitions**
 - a. **Student information:** Any information contained in a student's education record (e.g., test scores, health records, enrollment, demographics) maintained by a school district in electronic (e.g., computer files, e-mail) or hard copy (e.g., handwriting, print, tapes, film, microfilm).
 - (1) **Directory-type information.** Current information contained in a student's education record that would not generally be considered harmful or an invasion of privacy if disclosed. It includes, but is not limited to, the student's name, age, address, telephone listing, date and place of birth, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees and awards received, and the most recent previous educational agency or institution attended. (20 U.S.C. Code 1232g[a][5][A])
 - (2) **Nondirectory-type information.** Student information pertaining to a student's records that would generally be considered harmful or an invasion of privacy if disclosed. This includes, but is not limited to, assessment results, disciplinary and health records, and free or reduced-price meal eligibility.
 - b. **Personally identifiable information:** Any item of directory-type or nondirectory-type information that can be linked to or used to identify an individual student. Personally identifiable information includes, but is not limited to:
 - (1) The student's name.

- (2) The name of the student's parent or other family member.
 - (3) The address of the student or student's family.
 - (4) A personal identifier such as the student's identification number or social security number.
 - (5) A list of personal characteristics that would make the student's identity easily traceable.
 - (6) Other information that would make the student's identity easily traceable.
- c. **Parent:** A natural parent, an adopted parent, or legal guardian. Whenever written consent is required for disclosure of information, the school may presume that the parent giving consent has authority to do so, unless the school has been provided with evidence that the parent does not have authority under law. In the case of divorced parents, only the parent with legal custody may consent to release records, challenge content of a record, or offer written response to a record. The noncustodial parent does not need the consent of the custodial parent before inspecting and/or receiving a copy of the child's record. The rights accorded to parent/guardian in this procedure may, in some cases, be granted to surrogate parents (C.2.d.).
- d. **Surrogate parent:** A district-appointed representative who serves as the student's parent and has rights relative to the student's education equal to those of a parent. The surrogate parent may represent the child in matters relating to special education and related services, including the identification, assessment, instructional planning and development, educational placement, reviewing and revising the individualized education program, and in all other matters relating to the provision of a free appropriate public education of the student.
- e. **Legitimate educational interest:** One in which assigned duties and responsibilities of an employee require that the employee have access to student records. In case of doubt, the district employee having custody of the record may demand that the employee seeking access verify "legitimate educational interest."
- f. **Security of data:** Protection of confidential information in accordance with district policies. Security of data is the responsibility of all district employees who have access to confidential information.

- g. **Disclosure:** Granting access to, releasing, transferring, or otherwise communicating student information contained in education records to any authorized party, by any means, including oral, written, or electronic.
- h. **Redisclosure:** Disclosure of student information received by an authorized individual or organization to any other individual or organization.
- i. **School-affiliated organization:** Any district-approved organization sponsored or endorsed by a district school that is authorized to receive directory-type information, and that will use such data for noncommercial purposes only in support of the district's/school's educational goals.
- j. **Electronic student record:** Any item of information directly related to an identifiable student that is (1) maintained by the district or any employee, and (2) recorded on electronic media accessible via computer or a related device.
- k. **Student database:** A collection of personal and/or scholastic data retained on a computer for the purpose of recording and/or reporting information about an identifiable student or an aggregation of such students.
- l. **District student database:** A collection of personal and/or scholastic data retained on the central district data system.
- m. **Computer:** Any electronic device, whether or not capable of independent computation, used in conjunction with a computer in such a way that data can be transferred, manipulated, viewed, printed, or changed by this device.
- n. **Passwords:** Personal identification codes used to allow, prevent, and monitor access to data retained on electronic media.
- o. **"DWA Security Request":** Online request form used by all divisions, departments, and schools to request access to student information from Integrated Technology Support Services (Procedure 5705).

3. **Control of, Access to, and Release of Data**

- a. Information retained as part of the district student database is available via digital devices to authorized district personnel. Due to their confidential nature, access to these data shall be carefully controlled and monitored. *Any person, office, or school site seeking access to specific student data must obtain prior authorization from the department having the authority to grant such access (B.4).* Administrators and other users granted access to student data acknowledge their

understanding and acceptance of this Administrative Procedure when updating their system passwords to access district applications, which includes the Student Information System, or when logging into a district computer.

- b. Access to the following types of data requires prior authorization by the department/division indicated:

Student Data Type	Division
Academic Records	Office of Accountability
Assessment	Office of Accountability
Career planning	Academics, Student Services, Counseling and Guidance Department
Demographic	Office of Accountability
Discipline	Academics, Student Services, Counseling and Guidance Department
Enrollment/Attendance	Office of Accountability
Health Records	Academics, Student Services, Nursing and Wellness Department
Program Participation/designation	Office of Accountability
Special Education	Academics, Student Services, Special Education Department
Transportation	Business Operations: Transportation Department

- c. To conform to district and legal restrictions requiring the safeguarding and security of all data, a person authorized to have a password shall not share that password with any other individuals.
4. **Documentation of Access.** Integrated Technology Support Services (ITSS) shall maintain a record of all persons with authorized access to the district student database, including data elements to which they have access.
5. **Student Record Access Log: Nondirectory-Type Information** (see E.1., Attachment 1). A log shall be maintained with each student's record, listing all persons, agencies, or organizations requesting or receiving information from the record and the legitimate interests thereof. Such listing need *not* include:
- a. Parties to whom consent has been executed in accordance with C.8.
- b. School officials or employees having a legitimate educational interest as described in C.6.d.

The log shall be open to inspection only by a parent/guardian and school official or designee responsible for maintaining student records, and by the Comptroller General of the United States; the Secretary of Education; the administrative head of an educational agency as defined in Public Law Sections 93-380; and state educational authorities as a means of auditing operation of the system.

6. **Access to or Release of Educational Records Without Written Parental Consent.**

Only the individuals or agencies listed below may receive or have access to educational records (or personally identifiable information contained therein) other than directory-type information without written consent of a student's parent/guardian or a student eighteen years of age or older. In addition, appropriate personnel in the event of health and safety emergencies are also authorized to have such access (C.8.).

- a. **Either parent or guardian if student is a minor.** A parent or legal guardian shall be permitted to inspect written records concerning his/her child or ward in any reasonable manner in consultation with a certificated employee at any mutually convenient time during the school day. Access shall be granted no later than five (5) days following the date of request. If parents are divorced or separated, the parent not having legal custody has a right to inspect the child's written records and to receive an accurate copy of the records without regard to whether the custodial parent has given prior written permission (C.2.c.). A reasonable charge (10 cents per page) may be made for copies of records requested by a parent; such charge may be waived by the principal in case of hardship.
- b. **Students over eighteen and/or graduates** are entitled to access their own records and have sole right to provide consent for the release of their records and to seek amendment. (If the student is considered a dependent under the Internal Revenue Code, then the parents/guardians have the right to access educational records without the student's consent but not to consent to the release of the student's records.) Consent and the rights accorded to parents/guardians of the student shall *only* be required of, and accorded to, the student.
- c. **Students who are sixteen to eighteen years of age** or have completed tenth grade may have access to their records on request. However, parents/guardians retain authority to access and release records until the student reaches the age of 18.
- d. **School officials**, including teachers, student teachers, or other employees of the school district, as well as charter school employees, consultants, and service providers under contract with the district in which the student is enrolled, who have legitimate educational interests. Included are members of a school attendance

review board appointed pursuant to Education Code Section 48321, provided that such persons have a legitimate educational interest to inspect a record.

- e. **Officials of other schools or school systems in which a student intends to enroll.** The school district requesting transfer of a student's record shall notify the parent/guardian of the right to receive a copy of the record and right to a hearing to challenge the contents of the record. (Issuance of "Facts for Parents" information brochure [E.6.] by San Diego Unified School District meets this requirement.) "Other schools" include local, county, or state correctional facilities where educational programs leading to high school graduation are provided and any private school listed in the current annual Directory of Private Elementary Schools and High Schools in California, published by the California State Department of Education. If a private school requesting a transcript is not listed in the current directory, a parental request in writing must be submitted prior to release of the transcript.
- f. **State and local officials or authorities** to whom information is specifically **required** to be reported or disclosed pursuant to State statute adopted prior to November 19, 1974. Examples of information that must be reported:
 - (1) Nonaccidental injuries (child abuse), Procedure 6370
 - (2) Health emergencies, Emergency Procedure EP 07
 - (3) Commission of crimes, expulsion, narcotics, vandalism, arson, and possession of explosives or firearms (see *Emergency Procedures Manual*)
- g. **State Superintendent of Public Instruction** or a member of his/her staff, or county Superintendent of Schools of the county where the student attends, has attended, or plans to attend, or a member of his/her staff.
- h. **Representatives of the** Comptroller General of the United States; Secretary of Education; heads of certain educational agencies; and state educational authorities, provided that access to student records is necessary for an audit and evaluation of a federally-supported program or for enforcement of federal legal requirements in connection with such a program, and that unless specifically authorized by federal law, no information is included that would permit personal identification of students or their parents *after data have been collected. (Personally identifiable information shall be destroyed when no longer needed for such audits or evaluations.)*

- i. **Independent auditors** or agents employed by the district for audits or evaluations as required by law or as deemed necessary by the superintendent. Contract provisions detailing specifications of such employment must include assurances necessary for compliance with this procedure.
 - j. **Prospective granting agencies** in connection with a student's application for financial aid. (Only that information necessary to determine eligibility should be released.)
 - k. **Organizations and individuals conducting studies** in accordance with Procedure 4930. Such organizations/individuals must provide assurances necessary to comply with "Family Educational Rights and Privacy Act of 1974." This includes organizations/individuals conducting studies on behalf of the district for the purpose of developing, validating, or administering assessments and improving instruction. Such studies shall be conducted in a manner that will not permit personal identification of students or their parents/guardians by persons other than representatives of such organizations, and such information will be destroyed when no longer needed for the purpose for which the study is conducted.
 - l. **Accrediting organizations**, in order to carry out their accrediting functions.
7. **Court Orders.** Information concerning a student must be furnished in compliance with court orders/subpoenas. A record of release of information authorized by this section should be included in the Student's Record Access Log (C.5.). Though parental/guardian consent is not required, school personnel shall make a reasonable effort to notify the parent/guardian in advance of compliance with a subpoena (E.4., Attachment 4). Notification should be mailed to the parent/guardian immediately upon receipt of a court order; the Placement and Appeal Department shall be notified immediately upon receipt of a subpoena. For compliance with a subpoena, refer to Procedure 1710.
8. **Release of Information for Health or Safety Emergencies Without Parental Consent.** Information may be released to appropriate persons in connection with an emergency if knowledge of such information is necessary to protect the health or safety of a student or other persons. (This should be narrowly construed.) Factors that determine whether records may be released include:
- a. Seriousness of the threat to the health and safety of the student or other persons.
 - b. Need for such records to meet the emergency.
 - c. Whether persons to whom such records are released are in a position to deal with the emergency.

d. Extent to which time is of the essence.

Note: A record of release of information authorized by this section should be placed in the student's file.

9. **Release of Educational Records *With* Written Parental Consent.** Parental consent is required for release of student records to the persons and/or agencies listed below. The requesting individual or agency should obtain parental consent; schools should not do this for the requester unless it is unavoidable (E.2., Attachment 2, may be used for this purpose). All requests must be filed in the student cumulative folder and the information entered into the Student Record Access Log (E.1., Attachment 1). Parental consent must be signed and dated and must (a) specify records that may be disclosed, (b) state the purpose of disclosure, and (c) identify the party or class of parties to whom disclosure may be made.

Parents/guardians must be notified of their right to a copy of the records released under this provision, if desired; a nominal charge of 10 cents per sheet may be made. The recipient of the information must sign a statement to the effect that he/she will not transmit the information to others, and a copy of the statement must be placed in the student's file (E.3., Attachment 3).

- a. **Private individuals.** Lawyers, agents, private detectives, commercial organizations, and others not noted in C.6. and C.7. are considered to be private individuals for purposes of this regulation.
- b. **Representatives of agencies,** including the following:
United States Department of Justice
Federal Bureau of Investigation
United States Department of Labor
Internal Revenue Service
Post Office Department
Probation Department
United States Department of Health and Human Resources
United States Department of Education
United States Secret Service
United States Department of Defense (Selective Service, Military Intelligence),
except as noted in C.7. (Procedure 6525)
County Welfare Department
Franchise Tax Board
California Department of Motor Vehicles

- c. **Federal, state, and local law-enforcement officers** (except as noted in C.6. and C.8.).
 - d. **Officer or employee of a county agency responsible for protective services to children**, about a minor student referred to that agency for investigation or supervision by that agency.
 - e. **Officer or employee of any adoption agency licensed by the Department of Social Welfare**, about a minor placed with or under supervision of that agency or another minor from the same family, or about children in families for which an investigation by the agency is required under Civil Code Section 226.6.
 - f. **Officer or employee of the United States seeking information in the course of his/her duties**, when the student is a veteran of military service with the United States or an orphan or dependent of such veteran, or a noncitizen.
10. **Contacts With Attorneys.** Appeals of school decisions on placement of students, special attendance permits, or expulsions may occur with attorneys representing students or parents/guardians. Materials covering incidents in which student clients are involved may be furnished to attorneys representing them, provided such attorneys present proper written and signed authorizations from a parent/guardian in accordance with this procedure. Request for information not contained in a student's cumulative record should be referred to the Legal Services Office. An employee sought out by an attorney for an informal and private interview at a place other than the school site without a court order or subpoena is not required by the district or by law to discuss the matter in question with the attorney, except as required by a subpoena or other court order requiring a person to testify under penalty of law.
 11. **Requests for Notarized Information should be made in writing.**
 12. **Release of nondirectory-type information by a school must have approval of the principal or designee.** Information must not be given out unless the following facts have been established regarding a requester: (a) eligibility to receive information (C.6. through C.9.), and (b) confirmation of identity.
 13. **Notification of parent/guardian or student eighteen years of age or older of the right to inspect and review records as outlined in C.13.a. and b.** Notification of a parent/guardian or student eighteen years of age or older shall be made annually through issuance of the "Facts for Parents" (E.6.).

14. **Limitation on Destruction of Records.** Records must not be destroyed under regular records retention and destruction procedures if there is an outstanding request to review them.

15. **Providing Progress Reports/Report Cards to Noncustodial Parents on a Continuing Basis**

- a. Absent a legal prohibition to the contrary, a parent of a student, who does not have physical custody of that student, shall be entitled to receive progress reports and report cards relating to his/her child.
- b. Such information shall be provided throughout the school year to any noncustodial parent who makes a request to his/her child's school for receipt of that information. The request need only be made once during the school year, and must be in writing.

16. **Right to Challenge Contents of Student's School Records, Including Right of Appeal** (Education Code sections 49070 and 49071)

- a. Certain questionable information may be amended or removed from a record upon mutual agreement of the principal and the custodial parent/guardian. In event of disagreement, a parent/guardian must be advised of his/her right to challenge the contents of any student record.

The parent/guardian may file a written request with the appropriate area/assistant superintendent, seeking correction or removal of any information recorded in written records concerning his/her child or ward that he/she alleges to be any of the following:

- (1) Inaccurate
- (2) An unsubstantiated personal conclusion or inference
- (3) A conclusion or inference outside the observer's area of competence
- (4) Not based on the personal observation of a named person with the time and place of the observation noted
- (5) Misleading
- (6) In violation of the privacy or other rights of the pupil

(Sample Form, E.5., Attachment 5 may be used for this purpose.) While under appeal, originals of contested material *shall not* be given to any individual, including the party making the challenge.

Note: A hearing may not be requested by a parent/guardian to contest assignment of a grade (Procedure 4705).

- b. Within thirty (30) days of receipt of such request, the area/assistant superintendent (or a hearing panel [C.17.]) shall meet with the parent/guardian and the certificated employee who recorded the information in question, if any, and if the employee is presently employed by the district. *If the area/assistant superintendent sustains any or all the allegations*, he/she shall order correction or removal and destruction of the information and inform the parent/guardian in writing. Correction or destruction of the information is to be performed by a school employee responsible for custody of the school records. Under no circumstances is the original of the record to be removed from a file—or copied—and given to the individual challenging its content. *If the area/assistant superintendent denies any or all of the allegations* and refuses to order correction or removal of information, the parent/guardian shall be notified and may, within thirty (30) days of refusal, appeal the decision in writing to the Board of Education.
- c. Within thirty (30) days of receipt of such appeal, the board shall, in closed session with the parent/guardian and the certificated employee who recorded the information in question (if such employee is currently employed by the district), determine whether or not to sustain or deny the allegations. If the board sustains the allegations, it shall order the superintendent to correct or remove and destroy any or all of the information from the written records of the student and so inform the parent/guardian in writing. The decision of the board shall be final. Records of these administrative proceedings shall be maintained in a confidential manner and shall be destroyed one year after the decision of the board, unless a parent/guardian initiates legal proceedings relative to the disputed information within the prescribed period.
- d. If the final decision of the board is unfavorable to a parent/guardian, or if a parent/guardian accepts an unfavorable decision by the superintendent, the parent/guardian then shall have the right to submit to the custodian of the record a written statement of his/her objections to the information. This statement shall become part of the student's school record until such time as the information objected to is amended or removed. Any disclosure of the contested portion of a record must include disclosure of the statement of the parent/guardian.

17. Establishment of Hearing Panel

a. To assist in making a determination pursuant to C.16., the area/assistant superintendent or board may convene a hearing panel composed of the following persons (provided the parent/guardian has given written consent to release relevant information to the panel):

- (1) A principal of a school other than the school at which the record is on file (to be designated by the area/assistant superintendent).
- (2) A certificated employee appointed by the parent/guardian.
- (3) A parent/guardian appointed by the superintendent or board, depending on who convenes the panel.

Persons appointed shall, if possible, not be acquainted with the student, his/her parent/guardian, or the certificated employee responsible for the recording of the information, except when the parent/guardian appoints the certificated employee (C.17.a.[2]).

- b. The principal appointed to the hearing panel shall serve as chairman.
- c. The hearing panel shall, in closed session, hear the parent's/guardian's objections to the information and testimony of the certificated employee who recorded the information in question (if such employee is currently employed by the district). The hearing panel shall be provided with verbatim copies of the information that is the subject of controversy.
- d. A written finding shall be made setting forth the facts and decision of the panel; such findings shall be forwarded to the superintendent or board, depending on who convenes the panel. Proceedings of the hearing shall not be disclosed or discussed by panel members except in their official capacities. The hearing panel is only empowered to recommend; it does not make the final decision.

18. Right to File Complaint With the U. S. Department of Education. Parents/guardians have a right to file a complaint with the U. S. Department of Education concerning an alleged failure of the district to comply with "Family Educational Rights and Privacy Act of 1974." (This is not a step in the appeals process.)

19. Right to Include Statement/Response to Disciplinary Action. Whenever a student's record includes disciplinary information, the parent/guardian may include, as part of the

student's records, a written statement or response to the disciplinary information (Education Code section 49072).

D. IMPLEMENTATION

1. Employee Access to Nondirectory-Type Student Information

- a. **Initiator of request for access** completes the Submitter section on the online DWA Security Request form, found on the district website's home page in PeopleSoft > HCM > Self Service > DWA Security Request. Requester also completes the Approver section for the Administrator/Principal or Supervisor who will be approving the request.

Note: Approver must be an administrator, principal or supervisor in a position appropriate to supervise others who may use data or computer terminal (D.1.b.[1][f]).

b. Integrated Technology Support Services (ITSS)

- (1) Helps requester understand what parameters are in DWA Security Request in order to receive permission to access data electronically. Request can be sent via PeopleSoft or email, and must include:
- (a) Requester's name, employee ID, and contact information
 - (b) Type of data
 - (c) Reason for request (basis for need)
 - (d) Role of requester (i.e., Employee, Person of Interest/Contractor, or Oracle Reporting Business Intelligence Technology [ORBIT])
 - (e) Duration requested
 - (f) Individual responsible for security of data (i.e., Approver's name, employee ID, contact information)
- (2) For district SIS requests, contacts appropriate division(s) and forwards request for review and approval.

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- c. **Authorizing division** (division having authority to grant access) must grant approval for access to data, after being contacted by ITSS.
- (1) *If access is approved*, Integrated Technology Support Services responds to approver via email indicating approval. Upon receipt of a confirmation reply via email from the approver, ITSS personnel enter approved user's name into the district's tracking system.
- (2) *If access is not approved*, notifies requester and approver of decision via email, with reason(s) for denial.
- d. **Integrated Technology Support Services** retains a copy of the confirming email(s) as a record of access granted and authorization for enabling access.
- e. **Integrated Technology Support Services** implements approved requests for access, including assignment of requested passwords, instruction in appropriate computer procedures, and instruction in use of hardware and software capabilities appropriate for use with information on district student database.
- f. **Integrated Technology Support Services** prepares list of all persons with authorized access to student database by January 1 of each school year, and forwards to each division for review and reapproval.

Note: Access list changes resulting from this review/approval process will be implemented by the Integrated Technology Support Services.

2. **Nonemployee Access to Nondirectory-Type Student Information**

- a. **Notification of parent/guardian or student eighteen years of age or over.**
District notifies all parents/guardians annually about their rights concerning student records. Notification is made through the "Facts for Parents" brochure issued by the Communications Department (E.6).
- b. **Requests for nondirectory-type student information**

Note: Information shall not be released by processors of information (e.g., Integrated Technology Support Services) without authorization by the department having the authority to grant such access. Requests for individual student information must be referred to the school having custody of the record.

Exception: Appropriate offices (e.g., Research and Reporting Department) may release student data for district-authorized research projects under Procedure 4930,

and may provide a university researcher data on individual students for research purposes if students will not be identified in the final product.

- (1) **Administrative assistant or other employee** refers request to principal, manager, or designee.
- (2) **Principal, manager, or designee**
 - (a) Determines if requester is eligible to receive student information under regulations outlined in C.6. through C.9.
 - (b) Verifies identity of requester and provides only the relevant information. All requests must be submitted in writing or in person. Principal, manager, or designee verifies credentials.
 - (c) Files the written request in the student's cumulative record (if parental permission is required, see C.9.) and enters the appropriate information in the Student Record Access Log (E.1., Attachment 1), unless the log entry is not required (e.g., school officials or employees having a legitimate educational interest) (C.5.).
 - (d) If requester is not eligible or identity cannot be verified, explains basis for denying request.
 - (e) If there is doubt concerning eligibility to receive directory-type information, refers request to the Office of Accountability.

c. **Requests for scholastic records**

- (1) **Secondary schools** may provide a facsimile of "Cumulative Student Record" to persons or agencies authorized in C.6. through C.9. Follow Procedure 6510 in handling requests for transcripts from colleges or military service academies.
- (2) **Elementary schools** follow Procedure 6505 in handling requests for release of cumulative records. Handle other requests, as personal information, following provisions of this procedure.

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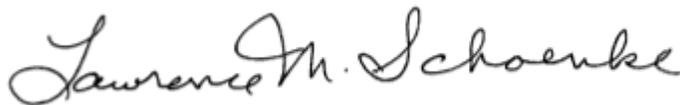
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E. FORMS AND AUXILIARY REFERENCES

1. Student Record Access Log: Nondirectory-Type Information, Attachment 1
2. Release of Student Information—Parent, Guardian, or Student Consent (individual case), Attachment 2
3. Release of Student Information with Parental Consent—Agreement to Limit Use of Information Received, Attachment 3
4. Release of Student Information in Compliance with Court Order, Attachment 4
5. Parent/Guardian/Student Request for Removal of Material, Attachment 5
6. *Facts for Parents*, brochure issued annually by the Communications Department.
7. DWA Security Request form, available online via the district website in PeopleSoft.

F. REPORTS AND RECORDS (See D.)

G. APPROVED BY



General Counsel, Legal Services
As to form and legality

H. ISSUED BY



Chief of Staff