

<b>Policy Number</b>	605.001
<b>Policy Title</b>	EDUCATIONAL PRIVACY POLICY
<b>Responsible Officer</b>	University Registrar
<b>Responsible Office</b>	Office of the University Registrar
<b>Summary</b>	The confidentiality of students' educational records is protected by the Family Educational Rights and Privacy Act (FERPA), a federal law and the policy below outlines the application of this law specific to CIU.
<b>Definitions</b>	
<b>Approving Body</b>	Academic Council; Administrative Council
<b>Approval Date</b>	605.000 - 10/02/2017; 10/09/2017 605.001 – Aca C (03.07.2022); Admin C (02.25.2022) <i>renewed</i>
<b>Last Revision</b>	2017
<b>Re-evaluation Date</b>	Fall 2025
<b>Departmental Impact</b>	University wide

*Failure to follow the following policy may result in disciplinary action, including termination of employment.*

### Policy Statement

*The confidentiality of students' educational records is protected by the Family Educational Rights and Privacy Act (FERPA), a federal law. Each person employed by the University holds a position of trust relative to this information and must recognize the responsibilities involved in maintaining the security and integrity of student records.*

FERPA guarantees students certain rights with respect to their educational records, including the right to:

- 1) inspect and review their education records within 45 days of the day the University receives a request for such access
- 2) request the amendment of their education record that they believe are inaccurate or misleading
- 3) consent to disclosure of personally identifiable information contained in their education records, except to the extent that FERPA authorizes disclosures without consent

Non-directory Information:

*Under no circumstances may the following be released (even to parents, roommates, spouses, and children), without written consent:*

- Grades/GPA
- Class Schedule
- Gender
- Financial Information
- Nationality
- Password/Pin Number
- Religious Affiliation
- Student ID Number
- Social Security Number (*full/partial*)

Non-directory Information is never to be given over the phone. The use of public e-mail addresses to transmit non-directory information is against the law and puts CIU at legal risk. Disclosure of information pertaining to a student's education record without consent is permissible to school officials with legitimate educational interests. A school official is a person employed by CIU in an administrative, supervisory, academic, research, or support staff position (including law enforcement and health staff); a person or company with whom CIU has contracted (such as an attorney, auditor or collection agent); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

Directory Information:

*Directory information may be disclosed without student consent and includes, but is not limited to the following:*

- Student's name
- Address

- Telephone number
- Date and place of birth
- Major field of study
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Dates of attendance
- Degrees and awards received
- The most recent educational institution attended by the student

A student may request, in writing, non-disclosure of directory information. Each semester CIU gives each student the opportunity to restrict directory information. Students opting not to disclose directory information will be removed from the online directory and will have a “privacy block” indicated in their address information. The appropriate faculty/staff response to a request for directory information for a student with a privacy block from someone other than a recognized school official should be: “There is no information available on that person.” The University cannot even reveal to the outside party that the individual in question is a student. Instructions for requesting that directory information not be released may be found on MyCIU. This request should be carefully considered since it could have undesired results. CIU will honor requests to withhold directory information but cannot assume responsibility to contact the student for subsequent permission to release this information. Regardless of the effect upon the student, CIU assumes no liability as a result of honoring instructions that such information be withheld.

### **Rationale**

This policy ensures that Columbia International University protects the privacy of Student Education Records in accordance with federal law and regulations and complies with requirements imposed on recipients of federal funding under programs of the U.S. Department of Education.

### **Policy Procedures**

FERPA information is to be disseminated to students annually. This notice reasonably informs students of their specific rights in regards to academic privacy. FERPA information is available to all students on MyCIU.

The Office of the University Registrar ensures that each of its staff members receive FERPA compliance training utilizing the tools available through the American Association of Collegiate Registrars and Admissions Officers (AACRAO).

Upon written request, the University shall provide a student access to his or her educational records except for financial records of the student's parents or guardian; and confidential letters of recommendation where the student has signed a waiver of right of access. If the records contain information on more than one student, the requesting student may inspect, review, or be informed on only the specific information about his or her own records. Educational records covered by FERPA normally will be made available within forty-five days of the request. The contents of a student's educational records may be challenged by the student on the grounds that they are inaccurate, misleading, or otherwise in violation of the privacy rights of the student by submitting a written statement to the custodian of records. The University Registrar is the official custodian of records at the University.

FERPA permits the disclosure of personally identifiable information (henceforth abbreviated PII) from students' education records, without consent of the student, if the disclosure meets certain conditions found in §99.31 of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, §99.32 of FERPA regulations requires the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose PII from the education records without obtaining prior written consent of the student in some cases.

Upon request, the University discloses education records without consent to:

1. officials of another school in which a student seeks or intends to enroll or is already enrolled,
2. parents of dependent students when proof of dependency is provided,
3. appropriate persons in connection with an emergency if knowledge is necessary to protect the health or safety of a student or other persons,
4. the courts, in compliance with judicial order or subpoena, after the University has made a reasonable effort to notify the student,
5. accrediting organizations to carry out their accrediting functions,
6. state and local officials authorized by Tennessee statute adopted prior to November 19, 1974,

7. federal or state officials as defined in the regulations concerning this law, who may re-disclose such records or personally identifiable information to a third party in connection with program evaluation, research, or data compilation, and
8. appropriate persons in connection with a student's application for or receipt of financial aid.

**The Right to File a Complaint:** Each student has the right to file a complaint with Columbia International University Registrar or the Department of Education concerning alleged failure by the University to comply with the requirements of FERPA and this Policy. Complaints should be filed, in writing, and addressed to either of the following:

Office of the University Registrar  
Columbia International University  
7435 Monticello Road  
Columbia, SC 29203

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue,  
SW Washington, D.C. 20202-5920

**Hyperlinks**

[www.ciu.edu/policy](http://www.ciu.edu/policy)

<https://www2.ed.gov/policy/gen/reg/ferpa/index.html>