

## PROTECTION OF STUDENT PRIVACY POLICY (FERPA LAW)

Columbia Central University (CCU) according to the Family Educational Rights and Privacy Act, FERPA (1974 as amended) adopts the following privacy policy for active or inactive student records.

# Applicability

This policy applies to any student who is enrolled or has been enrolled in a university program.

## Definitions

**Student -** Refers to a person who is enrolled in or has been enrolled in CCU. This excludes applicants who did not in our institution.

Educational record - Includes those records that may contain information directly related to the student and that are used as work records by the university. The following are not educational records:

- Records about the student made by professors and administrators for their use and not shown to others (includes disciplinary records).
- Employment records, except where a currently enrolled student is employed because of his/her status as a student. (e.g., work-study or student intern).
- Records related to the activities of the person when he/she is no longer a student at the university.

## FERPA - "Family Educational Rights and Privacy Act"

Those practices regarding the use and handling of the personal information that you share with us and your rights over it are detailed below. Annually, as necessary, or as required by law or regulation, we will notify you of our Protection of Student Privacy Policy (FERPA).

The policy allows students to inspect their educational records and limits the disclosure to others of personal information from educational records without the student's prior written consent. Provides the student the opportunity to request that educational records be corrected where appropriate.



## How and What Information Do We Collect?

CCU collects the following information from various sources namely:

- Through admission requests, "leads", or other forms
- By referrals from acquaintances
- Letters of recommendation, references, and others
- The College Board Office
- The student's academic progress
- Student behavior in college
- The financial condition, or that of their parents, provided through financial aid applications.
- Study costs, financial transactions such as account balances, payment history, payroll, financial aid.
- From the job you get during or after studying with us

#### Who Do We Share the Information With?

Only the aforementioned information is shared with those people related to the university who have the right and/or need to know it. CCU does not share personal information with third parties, except those permitted by law, especially by the FERPA Act. Third parties are people, companies, or organizations that are not part of our university.

#### Security Measures Implemented to Ensure the Protection of Information

CCU limits access to your information only to those employees who need it to carry out their legitimate functions, or who need access to it to comply with federal and local regulations in the education industry. Our employees have been duly instructed not to violate the privacy rights of our students. We also maintain the physical and electronic security measures necessary to safeguard the confidentiality of the information, as required by law and this policy.

#### Student's Right to Access Their Information

All students have the right to access their educational records, except those records that contain financial information of their parents and confidential letters of recommendation received before January 1, 1975. Also, parents whose child is a dependent claimed on the income tax return.



## **Relinquishment of Rights**

A student may relinquish their right of access to confidential referrals in three areas: admissions to any educational institution, job placement, and receipt of honors and awards. The university will not require such a waiver of the right as a condition for admission or to receive any service or benefit normally provided to students. If the student chooses to relinquish the right of access, they will be notified, when required, of the names of all the people who make the confidential recommendations. Such recommendations will be used only for the purpose for which they were specifically given. A waiver of the right can be revoked in writing, at any time, and the revocation will apply to all subsequent recommendations.

#### **Procedures to Follow**

Access requests specifying the file to be inspected must be made in writing to the Registrar. The university will show only the specific file requested. The university will comply with the request within a reasonable time, at most within 45 days of receiving the request. In a usual case, arrangements will be made for the student to read his/her file in the presence of a university employee. A student can also obtain copies of their record by paying the reproduction costs.

However, the university will not provide copies of official credit transcripts received from other institutions or schools. It is part of this policy to limit the disclosure of personally identifiable information from education records without the student's consent.

#### **Directory of Information**

The following items of credential information have been designated as a directory of information:

- Name
- Address
- Phone numbers
- Email
- Syllabus
- Student number
- Type of student
- Academic charge
- Participation in officially recognized activities and sports
- Dates attended at the University
- Degrees and awards conferred
- Educational institutions previously attended



CCU will provide students with an annual public notice of the categories of information and will allow a reasonable time after such notice for the student to inform the university that this information should not be used as information in a directory. Directory of Information may appear in public documents and may be disclosed without the student's consent unless the student objects as provided in the previous paragraph.

## When No Prior Consent is Required

Prior student consent will not be required to release education records to the following persons or entities:

- 1. To university officials who have been determined to have a legitimate educational interest.
  - "University officials", includes teaching and administrative personnel, who are or may be able to use the information to support a legitimate educational objective.
  - "Legitimate educational interest" includes those interests directly related to the academic environment.
- 2. Officials of other institutions in which the student is interested in enrolling or is enrolled. As required, and at their own expense, the student will be provided with a copy of the records that have been transferred.
- 3. Authorized representatives of the US Comptroller General, the Federal Secretary of Education, the US Commissioner of Education, the US Assistant Secretary of Education, and state educational authorities, but only in connection with audits or evaluations of federally supported educational programs or complying with federal requirements regarding these programs. These officials will protect the information received in such a way that the student's identification will not be available to outsiders and the information must be destroyed when the afore-mentioned purposes are met.
- 4. In connection with a student's application for or receipt of financial aid, but only to the extent necessary for purposes such as: determining eligibility, amount, conditions, and enforcing the terms and conditions of the aid.
- 5. State officials for whom such information is required to be reported by law that was adopted before November 19, 1974.
- 6. Organizations conduct educational studies to develop, validate, or administrate predictive tests, administer financial aid programs for students, and improve education. Studies must be conducted in such a way that the student's identification will not be available to outsiders and the information must be destroyed when the afore-mentioned purposes are met.
- 7. Accrediting organizations for purposes related to their functions.



- 8. To parents of dependent students.
- 9. To appropriate parties in connection with an emergency where knowledge of the information is necessary to protect the health or safety of a student or other individuals.
- 10. In response to a court order or "subpoena". The university will use reasonable efforts to notify the student before complying with said order.

## When Prior Consent is Required

In all other cases, the university will not disclose personally identifiable information maintained in educational records or allow access to those records without the prior consent of the student. Unless such disclosure is to the student himself/herself, the consent must be in writing, signed, and dated and must specify the record or information to be disclosed and the identity of who will receive the information or record. A copy of the record or information disclosed will be given to the student, if requested, at his/her expense.

#### **Disclosure of Records**

The university will keep evidence of the request in the student's file for its disclosure, except for disclosures made to the same student; disclosures made at the written request of the same student, disclosures to the university's administrative or teaching staff, or directory of information disclosures.

The disclosure record may be inspected by the student, the records custodian (registrar or designee), other universities, or government officials.

#### **Request to Amend the Records**

A student who believes that the information contained in his/her educational record is incorrect, mistaken, or in violation of privacy and other rights may submit a request in writing to the University Registrar, specifying the document(s) that are being objected to and the bases for said complaint. Within ten (10) business days from the date of receipt of the request, the university will decide whether to amend the records under the request. If the decision is to reject the amendment, the student will be notified and advised of the amendment's right to a hearing.

#### **Right to a Hearing**

At the request of the student, the university will provide an opportunity for a hearing to challenge the content of the student's records. The request for a hearing must be made in writing and submitted to the Registrar. Within ten (10) days from the date of the request, the student will be notified in writing of the date, place, and time with a reasonable time for the hearing.



#### **Hearing Process**

The hearing will be conducted by a university official who has no direct interest in the outcome of the hearing; the officer will be appointed by the campus chancellor. The student will have a fair and full opportunity to present evidence relevant to the arguments raised and may be assisted or represented by individuals selected by him/her, at his/her own expense, including an attorney. The officer conducting the hearing, after having considered all the relevant information, will make a recommendation to the University Registrar. Within five (5) business days after the completion of the hearing, the university will notify the student in writing of its decision. The decision will be based exclusively on the evidence presented at the hearing and will include a summary of that evidence and the reasons for the decision. If the university decides that the information in the student's record is incorrect or in violation of privacy or other rights, those records will be corrected; as necessary.

## Right to Put an Explanation in the Records

If because of the hearing, the university decides that the information is not incorrect or in violation of the privacy or other student's rights, the university will inform the student of his/her right to place in his/her file a statement commenting on the information and/or explaining the reasons for disagreeing with the college's decision. That explanation will be kept in the student's record while the disputed portion of the record is maintained in the student's record and will be released when the disputed portion of the record is released.