

OWENS COMMUNITY COLLEGE  
PROCEDURES

**Student Records Review**

**Board Policy No.: 3358:11-3-13**

**PROCEDURES:**

I. Definitions

- a. Student. A person who has obtained matriculation (enrolled) status at Owens Community College (“the College”).
- b. Personal Identifier. Information that can personally identify a student, such as: student name, address, name of the student’s parents or other family members, social security number, any other number or symbol that identifies the student, a list of the student’s personal characteristics, or any other information that would directly identify the student or make the student’s identity easily traceable.
- c. Education Records. Any record (handwritten, print, electronic or other medium) that is directly related to a student and maintained by the College, an employee of the College, or an agent of the College that is directly related to a student.
  - i. Exceptions from an education record:
    - 1. Personal or private note of an employee or an agent used as a memory aid that is kept in the sole possession of the maker of the record and not accessible or revealed to any other person.
    - 2. Employment record of an individual whose employment is not contingent on the fact that he or she is a student, provided the record is used only in relation to the individual’s employment.
    - 3. Records connected with an individual’s application for admission to the College prior to the individual’s actual attendance as an enrolled student. This would include a record connected with an application for admission to a program at the College prior to the individual’s actual enrollment and attendance in that program.
    - 4. A record maintained by the College’s Department of Public Safety shall be kept separate from an education record.
    - 5. A record maintained by the College’s Alumni Association shall be kept separate from an education record, as the individual is no longer a student.

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- d. School Official. Owens Community College designates a School Official, as follows:
- i. A person employed by the College in an administrative, supervisory, academic or support staff position.
  - ii. A person employed by or under contract to the College to perform a special task, such as an attorney or auditor.
- e. Legitimate Educational Interest. Owens Community College defines "legitimate educational interest" as the person's need to know in order to:
- i. Perform a task that is specified in his/her position or contract agreement.
  - ii. Perform a task related to the student's education.
  - iii. Perform a task related to the discipline of a student.
  - iv. Provide a service or benefit relating to the student or student's family, such as health care, counseling, job placement or financial aid.
  - v. Exceptions include:
    1. In connection with a student's request for receipt of financial aid as necessary to determine the eligibility, amount, or conditions of the financial aid or to enforce the terms and conditions of the aid.
    2. To certain officials of the U.S. Department of Education, the Comptroller General, to state and local education authorities, in connection with certain state or federally supported education programs.
    3. To comply with a judicial order or lawfully issued subpoena.
    4. To appropriate parties in a health or safety emergency.
    5. To accrediting organizations to carry out their functions.
    6. To organizations conducting studies for or on behalf of the College.

II. Annual Notification

The College is required to notify eligible students in attendance of their rights under the Family Educational Rights and Privacy Act (FERPA). The annual notification shall be posted on the College's website and may be publicized by other means at the beginning of each semester.

- Link: <https://www.owens.edu/records/ferpa-annual/>

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III. Statement of Student Rights

In accordance with College procedures, a student has the right to:

- a. Inspect and review an education record.
- b. Exercise control (with some limitations) over disclosure of information contained in an education record.
- c. Seek to appeal an education record.
- d. Be informed of their FERPA rights and have the right to file a complaint to the Family Education Rights and Privacy Act Office, United States Department of Education.

IV. Procedures to Inspect and Review an Education Record

A student has the right to inspect and review an education record that is directly related to the student, in accordance with the following procedures.

- a. A completed form from the student will assist the College in providing the record for inspection. The request form should state the specific record or identify the area related to the record.
  - Link: <https://cdn.owens.edu/trustees/wp-content/uploads/sites/45/2019/05/Request-to-View-Academic-Record-Form.pdf>
- b. The request form should be addressed to the Registrar.
- c. The request to inspect will be granted within a reasonable period of time; such time will not exceed 45 calendar days from the date of the receipt from the Registrar.
- d. The education record will be inspected and reviewed by the student in the presence of a respective department employee. Be advised that:
  - i. An education record cannot be changed during the process of inspection and review.
  - ii. The student may be advised of how to seek to make an appeal if the student has a concern of the education record.
  - iii. The College is not required to provide a copy of the education record. An education record cannot be copied or photocopied.
  - iv. If an education record contains information about more than one student, the student can only inspect and review the information that is related to him or her.

V. Directory Information

The College designates that personally identifiable information contained in an education record as “directory information.” The College may, at its discretion, disclose the information without a student’s prior written consent.

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A student has the right to restrict the release of directory information. The student can complete an “Authorization to Withhold Directory Information Form.” The form is available on the web page of the Records Office, under FERPA and Proxy Access Information.

- Link to Form: <https://cdn.owens.edu/records/wp-content/uploads/sites/17/2018/06/withhold.pdf>

The 3358:11-3-61 Directory Information Disclosure Policy lists the designated items as directory information; which is the same as follows:

- Link to Form: [https://cdn.owens.edu/trustees/board\\_policies/11-3-61.pdf](https://cdn.owens.edu/trustees/board_policies/11-3-61.pdf)
  - a. Student name.
  - b. Student telephone number.
  - c. Student mailing address and college e-mail address.
  - d. Student major fields of study.
  - e. Student participation in officially recognized activities and sports.
  - f. Weight and height of a member of an athletic team.
  - g. High school and hometown of a member of an athletic team.
  - h. Student dates of attendance.
  - i. Student expected graduation date, degrees and awards received.
  - j. Student enrollment status (full-time or part-time).

VI. Procedures to Seek to Appeal or Request to Amend an Education Record

An eligible student has the right to request to amend an education record, which the student may believe to be inaccurate or misleading. If the College official makes a determination to not amend the record, then the student has the right to seek an appeal.

To seek an appeal, the student can complete a “Non-Academic Appeal Form.” The form is available on the College website, under forms for current students.

- Link to Form: [https://cdn.owens.edu/forms\\_current/non-academic-appeal.pdf](https://cdn.owens.edu/forms_current/non-academic-appeal.pdf)

In accordance with the 3358:11-3-64 Student Non-Academic Appeal procedures, a formal non-academic appeal form must be timely filed. The non-academic appeal process will be handled in a timely manner, depending on the availability of information related to the appeal.

- a. Remedies/Determinations. A determination will be timely rendered. The decision of the Vice President of Student Services is final. The student will be notified by Owens e-mail of the decision from the Office of Student Services.

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- i. The education record may stand. If the decision is that the challenged information is determined as not inaccurate, misleading, nor in violation of the student's rights of privacy, the Office of the Vice President of Student Services will notify the student that he or she has a right to place in the record a statement commenting on the challenged information and/or a statement setting forth reasons for the disagreement with the decision. (The student's statement will be maintained as part of the education record as long as the challenged portion is maintained. Whenever the challenged part of the record may be destroyed, the destruction will also include the student's statement, in accordance with the College's records retention policy.)
- ii. The education record may be amended. If the decision is that the information is determined as inaccurate, misleading, or may be in violation of the student's rights of privacy, the Office of the Vice President of Student Services will direct the education record to be amended and will notify the student, in writing, of said action.

Effective Date            11-17-2019