

## **Policy VI.6000.A, Student Records Management**

### **Purpose**

The purpose of this policy is to state the types of records maintained by San Jacinto College (the College), define the terms associated with these various types of records, and explain the process for amending records.

### **Policy**

The College shall develop and maintain a comprehensive system of student records related to various facets of the College's operation and shall ensure through reasonable procedures that records are accessed by authorized persons only, as allowed by this policy. These data and records shall be stored in a safe and secure manner and shall be conveniently retrievable for utilization by authorized school officials.

The Deputy Chancellor and College President is custodian of all records for currently enrolled students and for all official academic records; however, he or she may appoint one or more designees, as necessary, to perform record management duties.

Educational records are all records that contain information directly related to a student and are maintained by an educational agency or institution, or by a party acting on its behalf. As used in this policy, "records" includes paper files, electronic and digital files, audio files, and video and photographic files.

### **Type of Records Maintained**

- Academic progress
- Permanent academic data
- Attendance records
- Standardized test results
- Medical records, including meningitis test results
- Student Discipline records
- Book and library records
- Financial aid and other financial records
- Mental health records and counseling information
- Other records related to a student's day-to-day status
- Any other information in a digital file assigned to a student

Each student record shall be identifiable as to the source. Notes and observations recorded by an individual faculty member or other employee and kept for personal use, are not official student records except under the following conditions:

- The information is shared with someone other than a substitute for the employee.
- The information is used in preparation of student records.

### **Definition of Terms**

The following terms are interpreted as indicated:

- Eligible Student - a student who attends or has attended the College

- Custodian - the Deputy Chancellor and the College President of the College
- Custodian's Agent – Provosts, Vice Chancellors, Associate Vice Chancellors, Vice Presidents, Deans and those persons appointed by any of these to safeguard or to use student records
- School Official - A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the College. For purposes of this policy, a "school official" is:
  - a person employed by the College in an administrative, supervisory, academic or research, or support staff position (including Campus Police law enforcement unit personnel and health staff)
  - a person or company with whom the College has contracted as its agent to provide a service (such as an attorney, auditor, health care professional or diagnostician, IT computer services professional, or insurer)
  - a person serving on the Board of Trustees; a student serving on an official committee, such as a disciplinary or grievance committee
  - a student assisting another school official in performing his or her tasks
  - representatives of hospitals and clinical sites with whom the College has a contractual relationship that permits students to receive clinical training as part of their educational programs
  - companies or organizations with whom the College has contracted to provide plagiarism-detection services. Such companies may receive a student's work product for purpose of comparing the student's work with a reference database

### **Accuracy of Information**

If an eligible student believes that information in his or her educational records is inaccurate or misleading or otherwise violates the student's privacy, a request for correction may be given in writing to the custodian of the record or other school official who is responsible for the record.

- If the correction is not made within a reasonable length of time (a maximum of 30 working days), the student may request a hearing. The Dean of Student Development shall serve as the hearing officer; however, if the Dean of Student Development is the custodian of the record in question or otherwise has a direct interest in the outcome of the hearing, then a designee shall serve as the hearing officer.
- A hearing must be held within a reasonable time (a maximum of 30 school days, barring unforeseeable circumstances) after the request has been made. The hearing officer shall provide the eligible student and the custodian of the record reasonable notice of the date, time and place of the hearing. In advance of the hearing, the custodian of the record shall prepare a packet containing copies of the contested records and any other relevant records or documents, including any applicable policies and procedures. The custodian of the record shall prepare a report summarizing the reasons why he or she believes that the challenged record is not inaccurate or misleading or otherwise a violation of the student's privacy. The custodian shall provide the packet and report to the student and hearing officer at least one school day prior to the hearing. The student shall have a full and fair opportunity to present his or her own evidence related to the accuracy of the record. The student, at his or her own expense, may be represented by legal counsel or an advisor. The student's legal counsel or advisor may attend the hearing and confer with the student but may not participate in the hearing.

- The hearing officer shall prepare a written ruling within a reasonable time after the hearing (a maximum of 21 school days). The ruling must be based solely on the evidence presented at the hearing. The ruling must include a summary of the evidence and the reasons for the ruling.
- If the hearing officer concludes that no correction to the record is warranted, the eligible student is to be notified and informed of the right to place in the records a statement either commenting on or setting forth a reason for disagreeing with the school's decision.
  - An eligible student who disagrees with the outcome of the hearing may file a complaint with the U.S. Department of Education. The name and address of the office that administers Family Educational Rights and Privacy Act (FERPA) is the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202.
- A hearing pertaining to student records may be scheduled to challenge the accuracy of recording but not the assignment or merits of a grade.

**Definitions**

**Student Records:** Any personally identifiable information concerning a student maintained for use by the College. This includes the student’s name, address, personal identifiers such as social security numbers, and other personal characteristics or information that make the student's identity easily traceable.

The Authority, Applicability, Sanctions, Exclusions, and Interpretation do not differ from Policy II.2000.A, Policy and Procedures Development, Review, Revision, and Rescission.

**Associated Procedures**

- Procedure VI.6000.A.a, Student Records Management
- Procedure VI.6000.B.a, Confidentiality of Student Records

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Primary Owner	Deputy Chancellor and College President
Secondary Owner	Associate Vice Chancellor, Student Services