

## **2019-20 Notification of Student Rights under FERPA – Grinnell College**

The *Family Educational Rights and Privacy Act* (FERPA) is a federal law that governs the release of and access to student education records. FERPA affords Grinnell College students the following rights with respect to their education records:

1. The right to inspect and review your education records within 45 days after Grinnell College receives a request for access.
  - A student must submit a written Request to Inspect and Review Education Records, (form available in the Office of the Registrar or Student Affairs), specifying the record(s) the student wishes to inspect. Academic records are curated by the Office of the Registrar; students affairs records by the Office of Student Affairs. Copies will not be provided; however, the Registrar or another College official will make arrangements for you to access the desired record(s).
2. The right to request an amendment to your education record if you believe it is inaccurate, misleading, or otherwise in violation of your privacy rights under FERPA.
  - A student should submit a written Request to Amend Education Records (form available in the Office of the Registrar), clearly identifying the part of the record you want changed and specifying why it should be changed. The Office of the Registrar will notify you in writing of the College's decision with regards to your request. If you do not agree with the College's decision, the Registrar will advise you regarding appropriate steps to request an appeal.
3. The right to file a complaint with the U.S. Department of Education concerning alleged failures by Grinnell College to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:
  - Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202
4. The right to provide written consent before Grinnell College discloses personally identifiable information (PII) contained in your education record, except to the extent that FERPA authorizes disclosure without consent.
  - One exception that permits disclosure without consent is disclosure to school officials with a legitimate educational interest.
    - A school official is typically a person employed by Grinnell College in an administrative, supervisory, academic, research, or support staff position (including safety and security personnel and health staff); a person serving on the board of trustees; or a student serving on an official committee. A school official also may include a volunteer or contractor outside of Grinnell College who performs an institutional service or function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist

another school official in performing his or her tasks.

- A school official typically has a legitimate educational interest if the official needs to know information from your education record in order to fulfill their official responsibilities.
- Another exception that permits disclosure without your prior written consent are education records that Grinnell College defines as Directory Information. These items may be released without your consent and include:
  - Name
  - Address (local/campus and home/permanent)
  - E-mail address (institutional and personal)
  - Telephone number (local/campus, home/permanent, and mobile)
  - Major and Concentration fields of study
  - Status (including current enrollment, dates of attendance, full or part time, withdrawn)
  - Graduation information (including whether a degree was conferred and/or the degree and date it was conferred)
  - Academic awards received (e.g., Dean's List recognition)
  - Photograph(s) and/or video footage
  - Date and place of birth
  - Participation in officially recognized activities and sports (including the weight and height of members of athletic teams)
  - Most recent educational institution attended

Please note that you have the right to withhold the release of your Directory Information. Submit a [Request to Block the Release of Directory Information](http://www.grinnell.edu/FERPA) available at [www.grinnell.edu/FERPA](http://www.grinnell.edu/FERPA).

- Release of student education records, even to parents of dependent children, is generally not done at Grinnell College without the express written consent of the student. If you wish Grinnell College to release all or part of your education record to a third party, you should submit a written [Authorization to Disclose Academic Information](#) (form available in the Office of the Registrar) and/or [Authorization to Disclose Student Affairs Information](#) (form available in the Office of Student Affairs) specifying the record(s) you wish to release and the individual(s) or groups to whom you wish to disclose your education record(s). This authorization to disclose academic education records must be resubmitted every semester; student affairs education records every academic year.
- In addition, FERPA permits the disclosure of PII from your education record without prior written consent if the disclosure meets certain conditions found in § 99.31 of the FERPA regulations, including:
  - To officials of another school where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of § 99.34. (§ 99.31(a)(2))
  - To authorized representatives of the U. S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is responsible for

supervising the university's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of § 99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§ 99.31(a)(3) and 99.35)

- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§ 99.31(a)(4))
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§ 99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§ 99.31(a)(7))
- To comply with a judicial order or lawfully issued subpoena. (§ 99.31(a)(9))
- To appropriate officials, including parents of a student, in connection with a health or safety emergency, subject to § 99.36. (§ 99.31(a)(10))
- Information the school has designated as "directory information" under § 99.37. (§ 99.31(a)(11))
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of § 99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding. (§ 99.31(a)(13))
- To the general public, the final results of a disciplinary proceeding, subject to the requirements of § 99.39, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school's rules or policies with respect to the allegation made against him or her. (§ 99.31(a)(14))
- To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the school, governing the use or possession of alcohol or a controlled substance if the school determines the student committed a disciplinary violation and the student is under the age of 21. (§99.31(a)(15))

Questions concerning FERPA should be referred to the Office of the Registrar. A copy of FERPA, more details about your rights, and any Grinnell College policies related to FERPA are available at [www.grinnell.edu/FERPA](http://www.grinnell.edu/FERPA).

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