

# Procedure Manual



<b>Title: Family Educational Rights and Privacy Act (FERPA) Procedure for Staff</b>	<b>Number: A6Hx2-5.03B</b>
<b>Policy Number: 6Hx2-5.03</b>	<b>Page: 1 of 2</b>

## Procedures for Staff

### **Release of Information by Telephone**

College personnel are not authorized to release ANY information about the student over the phone. Only the College Registrar and Custodian of Records or his/her designee has the authority to release student record information compliant with FERPA, including directory information.

### **Emergency and Health and Safety**

FERPA should not be used as a reason to prohibit disclosure of personally identifiable information of a student when health and safety emergencies exist. The College expects employees to use their professional judgment in the disclosure of students' personally identifiable information and to release only information that is relevant and necessary for the mitigation of the emergency situation. The College does not expect an employee to invoke FERPA as their reason for not releasing information in any and all of these instances when a quick response may be required.

### **Court Orders and Subpoenas**

A court or other law enforcement official may have access to students' educational record information without students' express consent. All such requests shall be forwarded to the Custodian of Records, the Vice President for Student Affairs and Enrollment Management. The Vice President for Student Affairs and Enrollment Management or a designated representative shall notify the student in writing that the College intends to comply with the request after the notification period has expired. When requests are made related to a criminal investigation, the student will not be notified. Copies of all court orders, subpoenas, and similar documents shall become a part of the student's permanent educational record.

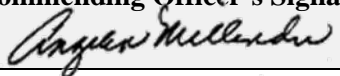
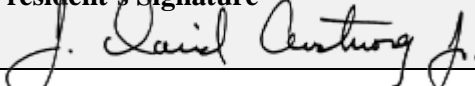
### **Procedure for Staff who Provide Advisement and other Customer Service via Phone and Internet**

College employees must follow the procedures to validate and authenticate the identity of the student prior to releasing any information. The College may also contract with a third party vendor to provide such services and that contracted vendor must follow the same or a defined authentication procedure. The following are the minimum standards outlined by the College:

### **Authenticate the Student**

Staff members should ask a series of questions. The following are examples:

- What is your Student ID?
- What is your full name and date of birth?
- What is your program objective?
- What was your first term of attendance?
- What were the dates of attendance in the class(es) for a given semester?
- Who was the instructor of record for the class?
- What is your current BC email address?
- What high school/postsecondary institutions did you attend?
- What was your high school and what year did you graduate?
- What are/were the last classes you are/were enrolled in at BC?

<b>Recommending Officer's Signature</b> 	<b>Date:</b> 10/12/2012	<b>President's Signature</b> 	<b>Date:</b> 10/12/2012
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- What are/were the names of your instructors?
- How much were your fees for the last term attended?
- How much financial aid did you receive during your last term of attendance?
- Ask for a response to the student's security question.

### Students with Non-Disclosure (ND) requests on file

Once it has been determined that the inquirer is the student, the staff member must also consider if the student has submitted a non-disclosure request. If the staff member gets the ND flag returned in the student system when accessing the student's record, they should do the following:

- For in person students, the student must show ID to get the requested information.
- For phone inquiries, the student must be instructed to come in with photo ID to get the requested information.

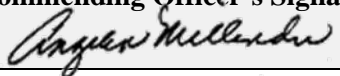
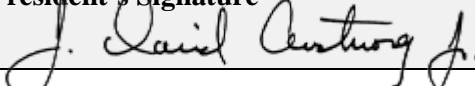
### Authenticated students may be provided with the following information

- Class Location and Time (Student must have provided course number or title)
- Transcripts Sent and Received Information – remind student info is online.
- Hold Information – “your records are on hold, please contact XXXXXX.”
- Degree Information – you can disclose if degree is posted.
- PIN Assistance - You may reset the PIN and give the student the PIN default formula.
- Departments or agents may only release information relative to the record the student is inquiring about (e.g., financial aid, credit and collections, petitions, etc.).

(Never disclose a changed PIN number or the default PIN number to the student.)

### Important Points to remember

- Do not release any information to a third party inquirer without the student's expressed written permission.
- Refer to FERPA policy (5Hx2-5.03), and Student Records, Retention, and Public Records policy (6Hx2-5.35) regarding access to student records and the College's definition of Directory Information that may be released without a student's consent.
- Never ask a student for his/her SSN. If they volunteer the information, do not acknowledge the number and continue with the authentication process.
- Never discuss grades or credits earned. Instruct the student how to access this information online (MyBC).
- Do not offer additional information other than that which is requested.
- If the inquirer persists, and you are uncertain of the identity or whether or not to release the information, ask for assistance from a supervisor, or refer them to the Associate Vice President for Student Affairs/College Registrar's Office.
- Public Records Requests: Florida Public Records Laws are aligned with the Federal Student Privacy Law (FERPA). The only public information that will be released by the College will be directory information.

<b>Recommending Officer's Signature</b> 	<b>Date:</b> 10/12/2012	<b>President's Signature</b> 	<b>Date:</b> 10/12/2012
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