

# Procedure Manual



<b>Title: Family Educational Rights and Privacy Act (FERPA) Procedure for Staff</b>	<b>Number:</b> A6Hx2-5.03B
<b>Policy Number: 6Hx2-5.03</b>	<b>Page:</b> 1 of 3

## 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.

### **Court Orders and Subpoenas**

A court or other law enforcement official may request access to students' educational record information without students' express consent. All such requests shall be forwarded to the Custodian of Records. The Custodian of Records 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 below to 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 the contracted vendor must follow the same or a defined authentication procedure. The following are the minimum standards outlined by the College:

### **Procedures for ensuring privacy for distance education (digital learning)**

Broward College is committed to protecting student privacy regardless of the mode of instruction (on-line, hybrid, classroom). Faculty teaching all distance education (digital learning) courses are expected to ensure security of students' educational record (including all course work) by following College policies and procedures, including:

- Teach distance education (digital learning) courses using only the College's learning management system (LMS), and associated learning systems, that are authenticated by the College's LMS/secure authentication platform.
- Use the College's secure Student Information System to report student grades.

<b>Recommending Officer's Signature</b> <i>Janice Stubbs</i>	<b>Date:</b> 4/6/2020	<b>President's Signature</b> 	<b>Date:</b> 4/6/2020
---	--------------------------	---	--------------------------

# Procedure Manual



<b>Title: Family Educational Rights and Privacy Act (FERPA) Procedure for Staff</b>	<b>Number:</b> A6Hx2-5.03B
<b>Policy Number: 6Hx2-5.03</b>	<b>Page:</b> 2 of 3

- Use the LMS, or the College's email system and email addresses, for all official, confidential communication such as providing feedback on student work, etc.
- Keep student work, scores, and grades confidential. Students should not have access to other students' work or grades.
- Keep all College login account information secure. Do not share any login information, or give anyone unauthorized access to the LMS, associated learning systems, or email.
- Follow the College's policies and procedures for sharing student educational record information with other faculty, staff, parents, or others.


## 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?
- 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.

## 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.


<b>Recommending Officer's Signature</b> <i>Janice Stubbs</i>	<b>Date:</b> 4/6/2020	<b>President's Signature</b> 	<b>Date:</b> 4/6/2020
---	--------------------------	---	--------------------------

## Procedure Manual



<b>Title: Family Educational Rights and Privacy Act (FERPA) Procedure for Staff</b>	<b>Number:</b> A6Hx2-5.03B
<b>Policy Number: 6Hx2-5.03</b>	<b>Page:</b> 3 of 3

- 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 Provost for Academic 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> <i>Janice Stubbs</i>	<b>Date:</b> 4/6/2020	<b>President's Signature</b> 	<b>Date:</b> 4/6/2020
---	--------------------------	---	--------------------------