

WALLA WALLA COMMUNITY COLLEGE
FERPA
ADMINISTRATIVE POLICY 7345

I. POLICY BACKGROUND/PURPOSE

Walla Walla Community College's (WWCC) Family Educational Rights & Privacy Act (FERPA) policy is intended to document the college's interpretation of and responsibilities under FERPA and to describe the circumstances under which the college may disclose student education records. This policy is not intended to detail all aspects of FERPA, but instead to provide guidance to school officials on how FERPA is administered at WWCC. Maintenance and oversight of this policy is the responsibility of the Registrar.

II. AUTHORITY

Board Policy 1370. Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99).

III. SCOPE OF POLICY

This policy applies to all students, faculty, and staff at WWCC.

IV. DEFINITIONS

The following are key terms as it applies to this policy:

- A. *Student* – Any person who is enrolled or was enrolled in any class offered through WWCC.
- B. *Enrolled* – A student is considered to be enrolled at the moment they register for any WWCC class.
- C. *Walla Walla Community College (WWCC) Class* – A class, offered through WWCC or any agency with which WWCC has a cooperative agreement. Classes may be taken on or off campus, through any distance learning medium, academic credit for prior learning, and includes classes not taken for credit (e.g. audit, community education).
- D. *Education Record* – Any record directly related to a student and is maintained by the college or by a party acting for the college. Education records may be in any medium including, but not limited to: handwriting, print, computer media (including electronic databases, learning management systems, and email), videotape, audiotape, film, microfilm, and microfiche. The following are NOT defined as education records:
 1. Sole possession records: Records or private notes that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker. Any record that is made in conjunction with a student or other school official is NOT a sole possession record.
 2. Law enforcement unit records: Records that are created, maintained, and used by Campus Security solely for law enforcement purposes.
 3. Employment records: Records relating to individuals who are employed by the institution, unless employed as a result of their status as students (e.g., work-study).
 4. Treatment records: Records made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional if the records are used only for treatment of a student and made available only to those persons providing the treatment.

5. Alumni records: Records that contain only information obtained after the individual is no longer enrolled in classes.
- E. *School Official* – A school official includes:
1. A person employed by WWCC in an administrative, supervisory, academic, research, clerical or support staff position (including but not limited to campus safety and security, academic advisors, and mental health staff),
 2. a person serving on the Board of Trustees,
 3. a person (including students) serving on an official college committee, such as a disciplinary or grievance committee,
 4. a volunteer, contractor, consultant or other party outside of WWCC:
 - a. who performs an institutional service or function for which the college would otherwise use its own employees,
 - b. is under the direct control of the college with respect to the use and maintenance of education records, such as an attorney, auditor, or collection agent or a student volunteering to assist a school official in performing their tasks,

AND

 - c. is subject to the obligation not to disclose personal identifiable information from any education record without the prior written consent of the student.
- F. *Legitimate Educational Interest* – A school official has a legitimate educational interest if they must complete a task or engage in an activity related to:
1. Performing a task that is specified in their position description or contract;
 2. performing a task related to a student’s education or to student discipline;
 3. providing a service or benefit related to the student (e.g., job placement, health insurance); or
 4. maintaining safety and security on campus.
- G. *Directory Information* – WWCC’s directory information includes:
1. Student’s Name
 2. Field of Study
 3. Enrollment Status (e.g. full-time or part-time)
 4. Dates of Attendance
 5. Participation in Recognized Sports
 6. Degrees or Certificates Earned
 7. Term Degree or Certificate Awarded
 8. Degree Honors

V. POLICY

- A. Annual Notification
Students will be notified annually of their FERPA rights through appropriate means as determined by the Registrar.
- B. Inspection of Education Records
A student may request inspection of their education record by submitting a written, dated request to the Office of Admissions and Records.
- C. Amendment of Education Records
Students have the right to request the amendment of their education records if they believe the content to be inaccurate, misleading, or otherwise in violation of their privacy rights under FERPA.

1. Requests for amendment of education records related to grades is covered under Instructional Grievance Administrative [Policy](#) and [Procedure](#) 6040.
- D. Authorization for Release of Education Records
Education records may be released to a third party per individual student authorization.
 - E. Directory Information
WWCC *may* release directory information contained in a student’s education records without violating FERPA if the student has not restricted their personal information (see section V.F. Request to Restrict Directory Information below).
 - F. Request to Restrict Directory Information
Students wishing to be excluded from the student directory information as defined in Public Law 93-380 (also known as the Buckley Amendment), may update their privacy restrictions in their ctLink account to seal their records. WWCC assumes that failure on the part of any student to specifically request the withholding of “Directory Information” indicates individual approval for disclosure.

<p>Policy Contact: <u>Vice President, Student Services</u></p> <p>Approved by (Department/Body): <u>Dr. Chad Hickox, President</u></p> <p>Date Originally Approved: <u>July 9, 2024</u></p> <p>Last Reviewed/Revised on: _____</p>
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