

Applies to: (examples; Faculty, Staff, Students, etc)

Faculty , Staff , Students

Policy Overview:

Issued: 01-01-2020

Next Review Date: 02-01-2022

Frequency of Review: Annually

The University has established guidelines covering access to information contained in student educational records to ensure compliance with the Family Educational Rights and Privacy Act ("FERPA"). This policy supplements existing FERPA policies and statements.

Applies to all employees including faculty, staff, and student workers.

Details:

The Family Educational Rights and Privacy Act ("FERPA") is a federal law that protects the privacy of student educational records maintained by the University of Health Sciences and Pharmacy in St. Louis, including counseling and treatment records at the student health and counseling center. All employees are responsible for protecting student records and adhering to the University's FERPA policy as contained in the Academic Catalog. The University authorizes access to student records only when an employee has a legitimate educational interest in knowing the information. This policy sets forth guidelines that are intended to help faculty, staff, and student workers comply with FERPA. All employees with access to confidential student records information will be required to complete FERPA training and sign an appropriate confidentiality agreement.

Procedures:

1. Guidelines

- a. Employees will be given access to private information about students only if they have a legitimate educational interest to perform a task that is specified in a position description or contract; perform a task related to a student's education or student discipline, provide a service or benefit to the student; or maintain safety and security on campus.
- b. The Department of Human Resources will administer and track FERPA training to ensure that all faculty, staff, and student workers understand FERPA.
- c. Maintain the privacy of students' records at all times.
- d. Never disclose or discuss information learned through your position or a work assignment with anyone unless you have received permission from your supervisor, the student has signed a UHSP written consent to release information form, or the potential recipient has a clear, legitimate educational interest in knowing the information.
- e. Do not request information from the educational record custodian or access a student's record unless you have a legitimate educational interest with respect to that student and that particular information.
- f. Do not use personal information, including student name, ID, and SSN, or a portion of any ID/SSN numbers for the public circulation of class lists or posting of grades or academic progress to students. If such information needs to be posted, a random number known only to the instructor and student should be used.
- g. If a student asks for a letter of recommendation, a consent form is required if the student's personal academic information is contained in the letter. A recommender's statements based on personal observations or knowledge does not require a release from a student.
- h. You may share critical information about troubled students who might be considered a risk to self or others with appropriate institutional officials and, in the event of an emergency, external parties.
- i. Do not have students grade the work (homework, quizzes, exams, etc.) of other students unless it is part of an active learning exercise in which every student participates in the grading as part of the learning assignment or the student. In some instances, an instructor may use upper level professional students to grade work or provide feedback if the instructor obtains informed consent from the students in the class.
- j. Understand that only the appropriate educational record custodian may release information about a student's educational record to a third party outside of the University. You should refer parents or guardians to the Office of the Registrar unless

the student is present and/or you verify that the student has voluntarily provided written permission by executing the appropriate Student Consent for Disclosure of Education Records form.

- k. Refer requests for information from the education record of a student to the proper educational record custodian (e.g. Registrar, Financial Aid, Student Counseling Center, Business Office).
 - l. Do not release a student's class schedule without appropriate permission due to security reasons.
 - m. Provide non-directory information to third parties such as prospective employers, associations, honorary organizations, etc., without the student's written consent. (A listing of directory information can be obtained from the Registrar's Office or found in the Academic Catalog).
 - n. Do not request a student's grades from another class(es) to assist in grading for your class. This does not constitute a legitimate educational interest.
 - o. Be aware of your computer display and never leave your workstation or computer unattended or give your password to another student or employee. Always lock your computer and office or file cabinets containing student records, even if you leave only for a brief period.
 - p. Do not leave stacked graded papers, assignment or exams for students to pick up—not even in sealed envelopes (unless you have the student's permission to do so). Instead, return assignments and exams in class.
 - q. Do not save student data on unapproved drives, disks, etc. Utilize password protection and encryption methods to ensure data security.
 - r. Do not use students to assist with grading their peers, except in connection with contemporaneous classroom exercises, and consistent with commonly accepted educational practices.
2. Confidentiality Agreements

The University of Health Sciences and Pharmacy in St. Louis is committed to the protection and confidentiality of student educational records. The Director of Human Resources will take appropriate steps to ensure that faculty, staff, and student workers who serve as custodians or have access to student records as part of their job duties and responsibilities execute a Statement of FERPA Understanding. Human Resources will maintain the statement in the individual's personnel file

Responsibilities:

<u>Position/Office/Department</u>	<u>Responsibility</u>
Office of the Registrar	FERPA Policy compliance and provide support to faculty, staff, and student workers
Department, Human Resources	Basic FERPA Training for new hires, coordinating confidentiality agreements

Resources:

- Student Consent for Disclosure of Education Records form
- Statement of FERPA Understanding form
- Academic Catalog – FERPA policy

Policy Contacts:

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