

# COMPASS CAREER COLLEGE

## FERPA POLICY

### I. **Purpose:**

The right to privacy of confidential and personal information is a protected right of all persons as described in the 1974 Family Educational Rights and Privacy Act. This right of privacy extends to the student-teacher, student-student and student-patient/student-client relationship. Because of the legal, ethical and moral obligation, the students, faculty, and staff understand that a violation of the confidentiality of teacher, student or patient information and records can result in disciplinary action. Examples may include, but are not limited to obtaining or communicating information obtained from teacher materials, questions, answers and/or notes without school consent; obtaining or communicating information obtained about a fellow student, i.e. grades, progress in curriculum without student consent. Students, faculty and staff are expected to review and abide by the Confidentiality Policy adopted by Compass Career College.

### II. **Policy:**

It is the policy of Compass Career College that any student desiring access to his education records shall make a request in writing to the Student Services area by submitting a Request for Information form. Parents, guardians, or designated individuals are permitted access to education records only with the prior written consent of the eligible student. However, the College reserves the right to contact parents, guardians, or other designated individuals of students who are under 21 years of age if the student has been involved in a violation of the College's alcohol or drug policies. Any party who believes that information contained in the education records of the student is inaccurate or misleading or violates the privacy or other rights of the student may request the amendment of the educational records in accordance with the published grievance/complaint/appeals policy.

Under the provisions of the Act, certain information designated as "Directory Information" concerning the student may be released by the College unless the student has informed the College that such information should not be released. Compass Career College may release the following directory information: the student's name, address(es), telephone number(s), dates of enrollment, program of study, enrollment status, and the most recently attended educational agency or school.

Under the provisions of the Act, the school may disclose education records without prior written consent of the student to school officials with a legitimate educational interest defined in the regulations:

- as a person employed by the institution in an administrative, supervisory, academic, research, or support staff position
- a person serving on the board or advisory committee of the institution
- a contractor who performs an institutional service function for which the school would otherwise use its own employees and who is under direct

control of the school with respect to the use and maintenance of PII from educational records, such as an attorney, auditor, or collection agent.

Students have the right to file a complaint with the U.S. Department of Education concerning alleged failures to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, DC 20202-5920

### **III. Procedure:**

Any person who wishes NOT to have any or all of the above listed information released must complete the appropriate form with the Student Services area. Once submitted, no information will be released regarding the student (including references for employment). One provided exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official is a person employed by the College in an administrative, supervisory, academic, research, or support staff position; a person or company with whom the College has contracted (such as an attorney, auditor, or collection agency); a person serving on the Board of Supervisors; or a student or faculty/staff member serving on an official committee, such as disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

Under the provisions of the Act, the school may disclose upon request the educational records to officials of another school in which a student seeks or intends to enroll without prior written consent of the student. The College may also release personally identifiable information from the education records of a student to appropriate parties in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals.

#### **Policy regarding Grades and Transcripts**

Students receive grades at the end of each course section in their chosen program at Compass Career College. Graduates are given a copy of their final academic transcript free of charge during normal business hours. Any student may request a copy of their academic record for a \$10.00 fee by submitting a request of information form available in the student services area. Compass Career College maintains as part of the student's permanent academic record/file the comprehensive grade earned for individual courses as well as the scores from the student's tests.

#### **Policy regarding Access to Student Records**

Original student records are maintained in a fire proof filing cabinet. This filing cabinet is kept in a separate office and maintained by Student Services. The

student files are off limits to all students. Students who wish to see the information in their files must make a written request by submitting a request of information form. A student is not allowed to view any information regarding another student.

Unsupervised access to the office where student files are maintained is not allowed. Only authorized personnel are allowed to enter the room. Authorized personnel are: President, Director, Compliance Officer, Bookkeeper, Financial Aid Director, Admissions Director, Student Services Coordinator, and Placement Coordinator. All files are to be returned to the secure area the same business day. No files are allowed to leave the building.

**List of disclosures that postsecondary institutions may make without consent**

FERPA permits the disclosure of PII from students' education records, without consent of the student, if the disclosure meets certain conditions found in §99.31 of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, §99.32 of FERPA regulations require the institution to record the disclosures. Eligible students have a right to inspect and review the record of disclosures in accordance with the procedure to request access to student records as defined above. A postsecondary institution may disclose PII from the education records without obtaining prior written consent of the student:

- to other school officials, including teachers, who have a legitimate educational interest. This includes contractors, consultants, or other parties to whom the school has outsourced institutional services or functions.
- 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.
- 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. Disclosures under this provision may be made 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 related 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.
- 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 aid, determine the conditions of the aid, or enforce the terms and conditions of the aid.
- 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.
- to accrediting organizations to carry out their accrediting functions.

- to parents of an eligible student if the student is a dependent for IRS tax purposes.
- to comply with a judicial order or lawfully issued subpoena.
- to appropriate officials in connection with a health or safety emergency.
- information the school has designated as “directory information.”
- to a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding.
- to the general public, the final results of a disciplinary proceeding if the institution 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.
- 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 institution 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.