

October 26, 2017

To: Departmental Representatives, Undergraduate Administrators, and Residential College Deans

From: Jill Dolan, Dean of the College

Re: Policy on Family Educational Rights and Privacy Act (FERPA)

FERPA Policy
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This policy addresses undergraduate student academic files¹ maintained by both the residential colleges and the academic departments. These personally identifiable education records must be handled in a secure, confidential, and consistent manner, one that is governed largely by the Family Educational Rights and Privacy Act (FERPA).

FERPA is a federal statute² that protects the privacy of personally identifiable student records and controls the circumstances under which such records may be disclosed. It also provides students with a right to review their education records.³

While the disclosure of information outside the University regarding current and former students that was collected during their enrollment is generally prohibited, FERPA does allow for the public disclosure of certain “directory information,” provided that the given student has not expressly objected to such disclosure.⁴ The University considers the following to be information that may be shared with the general public:

- Name
- E-mail address
- Photo
- Dates of attendance
- Major field of study
- Degrees and awards
- Academic institution attended immediately prior to Princeton University
- Participation in officially recognized activities, organizations and athletic teams
- Weight and height of members of athletic teams

¹ For the purposes of this policy, the academic file held in a student’s residential college during a student’s enrollment, and thereafter in Seeley Mudd Library, is considered to be the student’s official file.

² FERPA was enacted in 1974 and amended by the Department of Education periodically since then.

³ “Education records” include files, documents, and other materials (whether in physical or electronic format) that contain information directly related to or personally identifying a student and that are maintained by the University, whether in the residential colleges or in the department. Certain types of information are not considered “education records” under FERPA, including: (i) records made by University personnel, including administrators and faculty, which are in the sole possession of the person who made the records; (ii) records maintained by Public Safety for law enforcement purposes; (iii) medical and counseling records that are used solely for treatment; and (iv) alumni and non-enrolled student records.

⁴ The Office of the Registrar maintains the official University record of undergraduate students who have expressly objected to such disclosure.

The University has decided to keep confidential or internal the following additional data elements, although they are identified by FERPA as being available for public disclosure. University policy dictates that student address information should not be disclosed to third parties in the absence of a compelling reason.⁵ The following elements must be treated as confidential, consistent with the University's Information Security Policy:

- Date of birth
- Place of birth
- Addresses

Under certain conditions, it is permissible to disclose other personally identifiable information, beyond the items identified above as "directory information." By way of example, information concerning financial aid and other financial matters, evidence of academic or non-academic disciplinary matters, details of academic progress, grades, etc.—normally treated as confidential—may be revealed to certain third parties identified in the statute (e.g., government officials), or when those third parties present a formal release signed by the student. When such a release is presented, a copy should be placed in the student's file to indicate that the disclosure of information was properly authorized.

Additionally, an education record may be released to appropriate parties in connection with an emergency if the information is necessary to protect the health or safety of the student or others. In all cases, the basis for the disclosure and the parties to whom the information was disclosed must be recorded in the student's file.

By law, the University is required to make student education records available to the student (or a properly authorized representative) for inspection within 45 days of the request. Normally, this review is conducted in person in either the Office of the Dean of the College (ODOC) or the academic department office.

The student must submit a request in writing to see their file. Prior to a student's arrival, an ODOC staff member reviews the file to make sure that confidential material is removed (for instance, letters of recommendation to which the student has waived their right of inspection). Departments are encouraged to follow similar procedures.

While reviewing their education records, ODOC permits the student to take notes, request copies of documents (though normally not of the entire file), and place an explanatory note, letter or memo into the file. Students may not remove anything from their file.

Staff members of academic departments should familiarize themselves with the University's *Information Security Policy*, as well as the University's FERPA Statement, published annually in *Rights, Rules, Responsibilities* under the heading "Student Privacy Rights Under Federal Law." Questions about FERPA should be directed to the Office of the General Counsel.

⁵ If you are in doubt as to the appropriateness of a request for student address information from an individual, organization, or business outside the University, please contact Claire Fowler, senior associate dean of the college; Elizabeth Colagiuri, deputy dean of the college; or Polly Griffin, registrar.