
Chapter: Student Affairs

Modification No. 003

Subject: **Student Cumulative Records**

- 1 I. In the day-to-day operations of the College, employees must often utilize information of a
2 confidential nature in order to carry out their jobs. It is a major responsibility both ethically
3 and legally for all employees to safeguard and properly use confidential information.
4
- 5 II. Any past or present student's cumulative record as maintained by the College is
6 considered a confidential college record, and access thereto is limited to that student or
7 those persons who have legitimate requests for information contained in the record. Only
8 duly authorized personnel of the College, as designated by the President, are permitted
9 to extract and disseminate requested information.
10
- 11 III. The President is authorized and directed to establish procedures necessary to implement
12 this policy.
13

14 _____
Board Approval: July 15, 1968; September 15, 1975; October 17, 2016.

Chapter: Student Affairs

Modification No. 010

Subject: **Student Cumulative Records**

1 I. Introduction

2
3 Montgomery College (“the College”) complies with the Family Education Rights and
4 Privacy Act of 1974 (“FERPA”) and its amendments. It is the College’s policy (1) to permit
5 students to inspect their education records; (2) to limit disclosure of personally identifiable
6 information from education records to others without students’ prior written consent,
7 except to the extent FERPA authorizes disclosure without consent; and (3) to provide
8 students the opportunity to seek correction of their education records where appropriate.
9

10 II. Definitions

11
12 A. Directory Information has been designated by the College to include the following
13 information, which would not be generally considered harmful to the student, or
14 an invasion of privacy, if disclosed:

- 15 1. Student’s name;
- 16 2. Address;
- 17 3. Email address;
- 18 4. High school attended;
- 19 5. Major field of study (including current classification, year, credit load, and
20 number of academic credits earned toward degree);
- 21 6. Dates of attendance;
- 22 7. Degrees and awards received (type of degree and date granted);
- 23 8. Participation in officially recognized activities and sports;
- 24 9. Photograph, weight and height of members of athletic teams;

25 The following information will not be disclosed, but may be verified:

- 26 1. Telephone listing
- 27 2. Date of birth

28
29 B. Alleged Perpetrator of a Crime of Violence is a student who is alleged to have
30 committed acts that would, if proven, constitute any of the following offenses or
31 attempts to commit the following offenses: arson; assault offenses; burglary;
32 criminal homicide - manslaughter by negligence; criminal homicide - murder and
33 non-negligent manslaughter; destruction, damage, or vandalism of property;
34 kidnapping or abduction; robbery; forcible sex offenses.
35
36
37
38
39
40
41
42
43
44
45
46

- 47 C. Alleged Perpetrator of a Non-Forcible Sex Offense means a student who is
48 alleged to have committed acts that, if proven, would constitute statutory rape or
49 incest.
50
- 51 D. Disclosure means to permit access to or the release, transfer, or other
52 communication of personally identifiable information contained in education
53 records to any party, by any means, including oral, written, or electronic means.
54
- 55 E. Disciplinary Action or Proceeding is the investigation, adjudication, or imposition
56 of sanctions by the College with respect to an infraction or violation of the internal
57 rules of conduct applicable to College students.
58
- 59 F. Education records include those records (in handwriting, print, computer media,
60 video or audio tape, film, or other medium) that contain information directly
61 related to a student and that are maintained by the College as official working
62 files. Disciplinary action or proceeding records are considered education
63 records.
64
- 65 1. The following are not education records:
66
- 67 a. records about students made by educational personnel which
68 are in the sole possession of the maker of the record and are not
69 accessible or revealed to any other individual (except a
70 substitute who performs on a temporary basis);
71
- 72 b. law enforcement (campus security) records created by the law
73 enforcement unit, maintained solely for law enforcement
74 purposes, and kept separate from the education records
75 described above and not shown to others;
76
- 77 c. employment records relating exclusively to the student's capacity
78 as an employee, except that records of an individual who is
79 employed by the College because of the individual's status as a
80 student are education records (e.g. teaching or research
81 assistants, work study and student assistants);
82
- 83 d. records of a physician, psychologist, or other recognized
84 professional or paraprofessional made in connection with
85 treatment of student and disclosed only to individuals providing
86 the treatment. These records, however, may be reviewed by an
87 appropriate professional designated by the student;
88
- 89 e. records containing information relating to a student that do not
90 relate to the individual's time as a student, but rather related to
91 matters after that person is no longer is in attendance at the
92 College.
93
- 94 G. Final Results means a decision or a determination, made by an honor court or
95 council, committee, commission, or other entity authorized to resolve disciplinary
96 matters within the institution. The disclosure of final results must include only the
97 name of the student, the violation committed, and any sanction imposed by the
98 institution against the student.
99

- 100 H. Law Enforcement Unit Records are records, files, documents and other materials
 101 that are (1) created by a law enforcement unit; (2) created for a law enforcement
 102 purpose; and (3) maintained by the law enforcement unit.
 103
- 104 1. These records do not include:
 105
- 106 a. records created by a law enforcement unit for a law enforcement
 107 purpose that are maintained by a component of the educational
 108 institution other than the law enforcement unit;
 109
- 110 b. records created and maintained by a law enforcement unit
 111 exclusively for non-law enforcement purposes such as a
 112 disciplinary action or proceeding conducted by the institution.
 113
- 114 I. Legitimate Educational Interest means the demonstrated need to know by a
 115 College official who needs the education record or personally identifiable
 116 information in order to fulfill their professional responsibility.
 117
- 118 J. Personally Identifiable Information includes **data that can be used, in part or in**
 119 **combination with other Data to distinguish or trace an individual's identity,**
 120 **such as name, social security number, date of birth, student/staff M**
 121 **number; and any other information that is linked or linkable to an**
 122 **individual, such as medical, educational, financial, or employment**
 123 **information** but is not limited to, the name of the student, the student's parent or
 124 other family member; the address of the student or student's family; a personal
 125 identifier such as a social security number or student number; a list of personal
 126 characteristics, or other information which would make the student's identity
 127 easily traceable.
 128
- 129 K. Sanction Imposed means a description of the disciplinary action taken by the
 130 institution, the date of its imposition, and its duration.
 131
- 132 L. School or College Officials include any persons employed by the College in an
 133 administrative, supervisory, academic or support staff position (including law
 134 enforcement unit personnel and health staff); any person, firm, or company with
 135 whom the College has contracted (such as an attorney, auditor, or collection
 136 agent); any person serving on the Board of Trustees; any student serving on an
 137 official committee, such as a disciplinary or grievance committee, or assisting
 138 another school official in performing their duties.
 139
- 140 M. Student means any individual who is or has been in attendance at the College in
 141 either an on- or off-campus program, and regarding whom the College maintains
 142 education records. Persons whose applications to the College have not been
 143 accepted have no rights under FERPA. Admitted students are covered by
 144 FERPA once they have enrolled at the College.
 145
- 146 N. Violation Committed means the institutional rules or code sections that were
 147 violated and any essential findings supporting the institution's conclusion that the
 148 violation was committed.
 149
- 150 O. Violent Crime means an offense that has as an element the use, attempted use,
 151 or threatened use of physical force against the person or property of another, or
 152 any other offense that is a felony and that, by its nature, involves a substantial

153 risk that physical force against the person or property of another may be used in
 154 the course of committing the offense. It includes, but is not limited to, the
 155 following offenses: criminal homicide, forcible sex offense, robbery, aggravated
 156 assault, and arson, as well as burglary of an occupied structure or dwelling and
 157 kidnapping.
 158

159 III. Inspection and Review of Records

160
 161 A. Right of Access

- 162
 163 1. Each student has a right to inspect and review their education records,
 164 except that the College does not have to permit a student to inspect and
 165 review:
 166
 167 a. education records containing information about more than one
 168 student, in which case the student may inspect and review or be
 169 informed of only the specific information pertaining to the
 170 student.
 171
 172 b. financial records of the student's parents;
 173
 174 c. confidential letters of recommendation received prior to January
 175 1, 1975;
 176
 177 d. confidential letters of recommendation placed in a student's
 178 education records after January 1, 1975; if the student has
 179 signed a waiver of their right to access; and the letters and
 180 statements are related to the student's (1) admission to an
 181 education institution; (2) an application for employment; or (3)
 182 receipt of an honor or award
 183
 184 (1) The College will not require waivers as a condition for
 185 admission, receipt of financial aid, or any other service
 186 or benefit.
 187
 188 (2) When the student has signed such a waiver, the College
 189 shall give the student, upon request, the names of
 190 persons who provided the letters and statements of
 191 recommendation and use the recommendation solely for
 192 the purpose intended.
 193
 194 (3) A waiver may be revoked in writing at any time, and the
 195 revocation will apply to all subsequent
 196 recommendations, but not to recommendations received
 197 while the waiver was in effect.
 198

199 B. Requests for Access

- 200
 201 1. Requests for access should be made in writing to the Director of
 202 Enrollment Services and College Registrar. The College will comply with
 203 a request for access within a reasonable time, which shall not be more
 204 than forty-five (45) days from the request. The College shall respond to
 205 reasonable requests for explanations and interpretations of records.

206 Usually, arrangements will be made for the student to inspect and review
 207 their records in the presence of the appropriate College staff member. If
 208 circumstances effectively prevent the student from exercising the right to
 209 inspect their education records, the College shall provide the student
 210 with a copy of the records requested. No campus will provide copies of
 211 any transcripts in the student’s records other than the student’s current
 212 College transcript. Official College transcripts, with the College seal, are
 213 provided at a higher charge, in accordance with the fee structure
 214 approved by the Board of Trustees and published in the College Catalog.
 215 The College shall not charge a fee to search for or retrieve education
 216 records.

- 217
- 218 2. Once a student has requested access to their education records, such
- 219 records cannot be destroyed until inspection and review have been
- 220 provided.
- 221

222 C. Types and Location of Education Records; Title of Record Custodians

223

224 1. Admissions

- 225
- 226 a. Director of Enrollment Services and College Registrar.
- 227
- 228 (1) Applications and transcripts from high schools and other
- 229 colleges previously attended.
- 230
- 231 (2) Admissions information.
- 232

233 2. Registrations

- 234
- 235 a. Director of Enrollment Services and College Registrar.
- 236
- 237 (1) All ongoing academic and biographical records from high
- 238 school and other colleges.
- 239
- 240 (2) Records of academic appeal.
- 241

242 3. Departments

- 243
- 244 a. Departmental offices; Chairs (Check first with the Director of
- 245 Enrollment Services and College Registrar).
- 246
- 247 (1) Miscellaneous records kept within the department.
- 248

249 4. Deans

- 250
- 251 a. Deans’ offices of each campus.
- 252
- 253 (1) Miscellaneous records.
- 254

255 5. Dean of Student Affairs

- 256
- 257 a. Students’ judicial and disciplinary records.
- 258

- 259 6. Counseling Department
- 260
- 261 a. Counseling department for each campus.
- 262
- 263 (1) Biographical data, summaries of conversations with
- 264 students, and test results
- 265
- 266 (a) Where such records are made and used only for
- 267 treatment purposes, they are not education
- 268 records and are not subject to this policy.
- 269
- 270 7. Financial Aid
- 271
- 272 a. Director of Financial Aid, Central Administration.
- 273
- 274 (1) Financial aid applications, needs analysis statements,
- 275 awards
- 276
- 277 (a) There is no student access to parents' financial
- 278 statements.
- 279
- 280 8. Career Development Center
- 281
- 282 a. Career/Transfer Center for each campus.
- 283
- 284 (1) Recommendations, unofficial copies of academic
- 285 records.
- 286
- 287 9. Business Services
- 288
- 289 a. Chief Business Officer, Central Administration.
- 290
- 291 (1) All student accounts receivable, records of student's
- 292 financial charges and credits with the College.
- 293
- 294 IV. Amending Education Records
- 295
- 296 A. Scope
- 297
- 298 The procedural safeguards set forth in this section are not applicable to grade
- 299 disputes.
- 300
- 301 B. Request to Correct Records
- 302
- 303 1. A student who believes information contained in their education records
- 304 is inaccurate or misleading or violates their right of privacy may submit a
- 305 written request to the Director of Enrollment Services and College
- 306 Registrar, specifying the document(s) being challenged and the basis for
- 307 the complaint. The request will be sent to the person responsible for any
- 308 amendments to the record in question.
- 309
- 310 a. Questions regarding the accuracy in recording of academic or
- 311 admissions data will be referred to the Director of Enrollment

- 312 Services and College Registrar, or the Campus Registrar where
313 the record is maintained.
314
315 b. Questions regarding the accuracy or appropriateness of
316 disciplinary material included in the cumulative report will be
317 referred to the Dean of Student Development of the campus
318 maintaining the record.
319
320 c. Questions regarding the accuracy of financial aid materials will
321 be referred to the Director of Financial Aid.
322
323 2. Within a reasonable period of time of receipt of the request, the College
324 will decide whether to amend the records as requested. If the College
325 decides not to amend the record as requested, the student will be so
326 notified and will also be advised of the right to a hearing.
327

328 C. Right to a Hearing
329

- 330 1. Upon request by a student, the College will provide an opportunity for a
331 hearing to challenge the content of the student's record(s).
332
333 a. A request for hearing should be in writing and submitted to the
334 Director of Enrollment Services and College Registrar.
335
336 2. Within a reasonable period of time of receipt of the request, the student
337 will receive written notification of the date, place and time reasonably in
338 advance of the hearing.
339
340 3. Conduct of the Hearing
341
342 a. The hearing will be conducted by a College official who does not
343 have a direct interest in the outcome.
344
345 b. The student will have a full and fair opportunity to present
346 evidence relevant to the issues raised and may be assisted or
347 represented by individuals of the student's choice at their own
348 expense, including an attorney.
349
350 4. Decision
351
352 a. Within a reasonable period of time after the conclusion of the
353 hearing, the College will notify the student in writing of its
354 decision. The decision will be based solely upon evidence
355 presented at the hearing and will include a summary of the
356 evidence and the reasons for the decision.
357
358 b. If the College decides that the information is inaccurate,
359 misleading or otherwise in violation of the privacy or other rights
360 of the student, the College will amend the records accordingly.
361
362 5. Right to Place an Explanation in Education Record
363

364 a. If, as a result of the hearing, the College determines that the
 365 information is not inaccurate, misleading, or otherwise in
 366 violation of the student's rights, the College will inform the
 367 student of the right to place in their record a statement
 368 commenting on the information and/or explaining any reasons for
 369 disagreeing with the College's decision. Any such explanation
 370 will be kept as part of the student's record as long as the
 371 contested portion of the record is kept and will be disclosed
 372 whenever the contested portion of the record is disclosed.
 373

374 V. Disclosure of Records

375 A. Prior Consent

- 376 1. In general, the College will not disclose a student's education records or
 377 personally identifiable information therefrom without the student's prior
 378 written consent.
 379
 380 2. The written consent must:
 381
 382 a. specify the records that may be disclosed;
 383
 384 b. state the purpose of the disclosure; and
 385
 386 c. identify the party or class of parties to who the disclosure may be
 387 made.
 388
 389 3. A student may request that the College provide a copy of the records
 390 disclosed pursuant to such consent.
 391
 392
 393

394 B. Prior Consent Not Required

- 395 1. The College *may* make disclosures of a student's personally identifiable
 396 information and/or education records, without obtaining prior written
 397 consent, if the disclosure meets one or more of the following conditions:
 398
 399 a. When the information is directory information as defined in
 400 Section I. (A).
 401
 402 (1) While disclosure of directory information about a student
 403 is not generally considered harmful or an invasion of
 404 privacy under FERPA, FERPA does not require the
 405 College to disclose directory information to outside
 406 parties. The College exercises discretion in responding
 407 to requests for directory information and may or may not
 408 provide such information when requested, depending on
 409 the intended purpose of the request. Where the College
 410 does decide to disclose directory information, it typically
 411 releases only names, terms enrolled, major field of
 412 study, and degrees and awards received. Requests for
 413 addresses and e-mail addresses may be released, at the
 414 College's sole discretion and provided such requests
 415 have been reviewed and approved by appropriate
 416

-
- 417 College personnel, in response to requests from law
 418 enforcement agencies and /or accredited educational
 419 institutions seeking to provide information to MC
 420 students regarding educational opportunities.
- 421 (a) Requests from educational institutions shall be
 422 reviewed by the Senior Vice President for
 423 Academic Affairs, or designee, in consultation
 424 with the Director of Enrollment Services and
 425 College Registrar.
 - 426 (b) Requests from law enforcement agencies shall
 427 be reviewed by the Director of Public Safety, or
 428 designee, with notice provided to the Director of
 429 Enrollment Services and College Registrar.
 - 430 (c) All other requests shall be reviewed by the
 431 Director of Enrollment Services and College
 432 Registrar or designee.
- 433
 - 434 (2) The College will not knowingly release directory
 435 information to any outside entity for commercial, political,
 436 or solicitation purposes. The College does not rent or
 437 sell student information for a fee.
 - 438
 - 439 (3) The College will give annual notice to students of the
 440 categories of information designated as directory
 441 information. A student may choose to have this
 442 information withheld and not disclosed by filing a request
 443 with the Director of Enrollment Services and College
 444 Registrar, within three weeks of the first day of the
 445 semester in which the student begins each school year.
 446 This notice must be filed annually within the above
 447 allotted time to avoid automatic disclosure of directory
 448 information. All requests for non-disclosure of directory
 449 information will be implemented as soon as publication
 450 schedules reasonably will permit.
 - 451
 - 452 (4) The College will use its best efforts to maintain the
 453 confidentiality of those categories of directory
 454 information that a student properly requests not be
 455 publicly disclosed.
 - 456
 - 457 b. When the information is disclosed to College officials who have
 458 legitimate educational interests.
 - 459
 - 460 c. When the disclosure is to officials at another institution of post-
 461 secondary education where the student seeks or intends to
 462 enroll. Upon request, a student will be given a copy of any
 463 records disclosed.
 - 464
 - 465 d. When the information is disclosed to organizations conducting
 466 studies for or on behalf of the College or an education agency, to
 467 develop, validate, or administer predictive tests, administer
 468 student aid programs, or improve instruction.
 - 469

- 470 (1) Information will only be disclosed under this exception if
 471 the study is conducted in a manner that does not permit
 472 personal identification of students by individuals outside
 473 the research organization, and the information is
 474 destroyed when no longer needed for the purposes of
 475 the study.
 476
- 477 e. When the disclosure is to an accrediting organization, to carry
 478 out their accrediting functions.
 479
- 480 f. When the information is disclosed in response to a judicial order
 481 or lawfully issued subpoena.
 482
- 483 (1) If a court order or subpoena shall be served on the
 484 College requesting the release of records, the Director of
 485 Enrollment Services and College Registrar will take the
 486 necessary steps to notify the student of such a
 487 subpoena, unless the order or subpoena specifically
 488 states that the student must not receive prior notice.
 489
- 490 g. When the information is disclosed because of health and/or
 491 safety emergency.
 492
- 493 (1) Subject to the approval from the Director of Enrollment
 494 Services and College Registrar, or Campus Registrar,
 495 information contained in a student's cumulative record
 496 may be released to appropriate persons in connection
 497 with an emergency if the knowledge of such information
 498 is necessary to protect the health or safety of the student
 499 or other persons. Factors to be considered in making a
 500 decision to release such information in these situations
 501 are
 502
- 503 (a) the severity of the threat to the health or safety
 504 of those involved;
 505
- 506 (b) the need for the information;
 507
- 508 (c) the time required to deal with the emergency;
 509 and
 510
- 511 (d) the ability of the parties to whom the information
 512 is to be given to deal with the emergency.
 513
- 514 h. When the information is disclosed to parents of dependent
 515 students.
 516
- 517 (1) Parents of dependent students who request access to
 518 the records of their student dependent age 18 or older,
 519 without the student's consent, must substantiate the
 520 dependent status of the student as defined in Section
 521 152 of the Internal Revenue Code.
 522

- 523 (2) The College may disclose information to either parent,
- 524 regardless of which one claims the student as a
- 525 dependent.
- 526
- 527 (3) Parents' access to student records under this exception
- 528 will be recorded in the record of disclosures.
- 529
- 530 i. When the information is disclosed in connection with financial aid
- 531 for which the student has applied or received and such
- 532 information is necessary to determine eligibility for the amount of,
- 533 or conditions related to such financial aid, or to enforce the terms
- 534 and conditions of the aid.
- 535
- 536 j. When the disclosure is to a victim of an alleged perpetrator of a
- 537 crime of violence or a non-forcible sex offense. The disclosure
- 538 may only include the final results of the disciplinary proceeding
- 539 conducted by the College with respect to that alleged crime or
- 540 offense. The College may disclose the final results of the
- 541 disciplinary proceeding regardless of whether the College
- 542 concludes that a violation was committed.
- 543
- 544 k. When the information is disclosed as the result of a disciplinary
- 545 proceeding conducted by the College against the alleged
- 546 perpetrator of a crime of violence or a non-forcible sex offense,
- 547 and the College determines, as a result of the proceeding, that
- 548 the alleged perpetrator committed a violation of the College's
- 549 rules or policies with regard to that crime.
- 550
- 551 (1) Only the final results of the disciplinary proceeding may
- 552 be disclosed.
- 553
- 554 (2) The College may not disclose the name of any other
- 555 student, such as a victim or a witness, without the prior
- 556 written consent of such student.
- 557
- 558 (3) This section applies only to disciplinary proceedings in
- 559 which the final results were reached on or after October
- 560 7, 1998.
- 561
- 562 l. When the information is disclosed to a parent or legal guardian
- 563 of a student at the College regarding the student's violation of
- 564 any Federal, State, or local law, or any rule or policy of the
- 565 College governing the use or possession of alcohol or a
- 566 controlled substance if:
- 567
- 568 (1) the student is under the age of 21; and
- 569
- 570 (2) the College determines that the student has committed a
- 571 disciplinary violation with respect to that use or
- 572 possession.
- 573
- 574 m. If a parent or a student initiates legal action against the College,
- 575 the College may disclose to the court, without a court order or

- 576 subpoena, the student's education records that are relevant for
 577 the College to defend itself.
 578
- 579 n. If the College initiates legal action against a parent or a student,
 580 it may disclose education records to the court without a court
 581 order or subpoena, that are relevant for the College to proceed
 582 with the legal action.
 583
- 584 o. When the information is disclosed to State and Federal
 585 authorities as prescribed by law, including but not limited to
 586
- 587 (1) The Comptroller General of the United States, the
 588 Secretary of Education, authorized representatives of
 589 the Attorney General of the United States and state
 590 education authorities.
 591
 - 592 (2) Authorized representatives of the State and Federal
 593 governments may have access to those student records
 594 which may be related to the audit and evaluation of
 595 Federally-supported educational programs, or in
 596 connection with the enforcement of or compliance with
 597 federal legal requirements relating to these programs.
 598
 - 599 (3) The IRS pursuant to the reporting requirements of the
 600 Hope Scholarship Credit and Lifetime Learning Credit
 601 provisions of the Taxpayers Relief Act of 1997.
 602
 - 603 (4) The military service, in accordance with the Department
 604 of Defense Rules and Regulations, 32 C.F.R. § 216 *et*
 605 *seq.* ("The Solomon Amendment"), seeking access to
 606 information on students for military recruiting purposes.
 607
- 608 (a) The military service refers to the Army, Navy,
 609 Marine Corps, Air Force and Coast Guard,
 610 including their Reserve or National Guard
 611 components.
 612
 - 613 (b) Each branch of the military service can ask for
 614 student recruiting information during one
 615 semester.
 616
 - 617 (c) Student recruiting information is the student's
 618 name, local address, telephone listing, age (or
 619 year of birth), level of education or degree
 620 awarded for recent graduate, and major. The
 621 College's definition of directory information
 622 includes all these items of student recruiting
 623 information.
 624
- 625 (i) The College will provide student
 626 recruiting information on enrolled
 627 individuals who are 17 years of age or
 628 older.

- 629
 - 630
 - 631
 - 632
 - 633
 - 634
 - 635
 - 636
 - 637
 - 638
 - 639
 - 640
 - 641
 - 642
 - 643
 - 644
 - 645
 - 646
 - 647
 - 648
 - 649
 - 650
 - 651
 - 652
 - 653
 - 654
 - 655
- a) Enrolled students are students registered for at least one credit hour of academic credit during the most recent term, the current term or the next term.
 - (ii) The College will not provide student recruiting information requested by the military:
 - a) on enrolled individuals who are not yet 17;
 - b) if the College does not maintain the information;
 - c) if the College has already provided the information to the military service for that semester;
 - d) if the student has formally requested the College to withhold directory information from third parties.

C. Limitations on Redisclosure of Information

- 1. Where information is released without the prior consent of the student pursuant to one of the exceptions set forth in subsection B above, the College shall inform the third party to whom disclosure is being made that no further release of personally identifiable information is authorized without the written consent of the student. This restriction does not apply to disclosures made to parents of dependent students, to disclosures made to parents pursuant to Section IV(B)(1)(l) with respect to the use or possession of alcohol or a controlled substance, to disclosures made in connection with disciplinary proceedings pursuant to Section IV(B)(1)(k), to disclosures made pursuant to court orders, lawfully issued subpoenas or litigation, to disclosures of directory information, or to disclosures to students.

D. Record of Disclosures

- 1. The College will maintain with the student's education records a record of each request for disclosure and each disclosure made, except for the following:
 - a. disclosures to the student him or herself;
 - b. disclosures pursuant to the written consent of the student (the consent form will suffice as a record);

681

-
- 682 c. disclosures to College officials;
683
684 d. disclosures of directory information; and
685
686 e. disclosures made pursuant to a subpoena where the issuing
687 court or agency has ordered that the existence of the subpoena
688 or the information furnished in response to it not be disclosed.
689
690 2. This record shall include the parties who have requested and received
691 personally identifiable information from education records and the
692 interests of the parties requesting or obtaining the information.
693
694 3. This record of disclosures may be inspected by the student, the official
695 custodian of records, and other College and governmental officials.
696

697 VI. Right to File Complaint

698
699 A student alleging the College's noncompliance with the Family Educational Rights and
700 Privacy Act may file a written complaint with the Family Policy Compliance Office, U.S.
701 Department of Education, 400 Maryland Avenue, S.W., Washington, D.C. 20202-0001.
702

703
704 Administrative Approval: September 15, 1975; March 8, 1977; March 6, 1983;
705 August 20, 1991; October 13, 2000; March 24, 2008; August 20, 2008; July 18, 2016; June 18,
706 2019; _____, 2022.