

# Superintendent Procedure 3231SP

## Student Records



Approved by: s/ Denise Juneau Date: 10/29/18

Denise Juneau, Superintendent

Student records shall remain confidential and not be disclosed except as provided in this procedure and as required by law. Student records shall be created, stored, and managed in a professional manner and pursuant to the following procedures and other applicable laws:

### **I. Categories of Records**

Student records shall be divided into two categories: the cumulative folder and supplementary records, as currently defined by the retention schedules of the Local Records Committee. Records may be found in multiple formats and locations within the District, including in the form of electronic records (e.g., email and immunization records maintained in the Washington State Immunization Information System).

Note that in 2016, the Washington State Department of Health implemented the Washington State Immunization Information System (WAIIS) to track immunization records for people of all ages. The system is a secure, web-based tool for healthcare providers and schools. As a result of its implementation, students enrolled in the District after 2016 will likely have their immunization record in WAIIS and will not have a hard copy in their physical file.

The cumulative folder may contain all information about a student which is collected and maintained on a routine basis, such as identifying information (name, birth date, sex, year in school, address, telephone number, parent's name, ethnic classification, emergency information [parent's place of employment, family doctor, babysitter, siblings]); attendance records including date of entry and withdrawal; grades and other student progress reports; results of tests of school achievement, aptitude, and interests; records of school accomplishments and participation in school activities; verified reports of misconduct, including a record of the disciplinary action taken; and such other information as shall enable staff to counsel with students and plan appropriate activities. Identifying information may be limited if the student is a participant in the state Address Confidentiality Program. All health records, hearing and vision screening results are maintained in the district's EHR (electronic health record system).

Supplementary records about a student may be collected and maintained in connection with special school concerns about the student, such as confidential health information or reports connected with assessment and placement of a student who is formally identified as a "focus of concern;" reports from nonschool persons and organizations such as physicians, psychologists and clinics, except for general screening purposes; reports pertaining to specific problems associated with the student; and current reports

of psychological tests and progress reports related to a student's disabling condition. All such reports included in records shall be dated and signed.

## **II. Definitions:**

*Disclosure* means to permit access to or the release, transfer, or other communication of personally identifiable information contained in education records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.

*Directory information* means the following: student name, address, telephone listing, home email address, student photograph, student date of birth, dates of enrollment, grade level, enrollment status, degree or award received, major field of study, participation in officially recognized activities and sports teams, height and weight of athletes, most recent school or program attended, and other information that would not generally be considered harmful or an invasion of privacy if disclosed.

*Education records* means those records that are directly related to a student and maintained by the school district or by a party acting for the school district, no matter where or in what form the records are kept.

There are limited exceptions to what constitutes an education record under federal law, including, but not limited to:

- Records 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 of the record.
- Records of the law enforcement unit of, or working in, the school district (this does not include discipline records maintained by school security staff).
- Records relating to the employment of a student by the school district that are not available for use for any other purpose.
- Grades on peer-graded papers before they are collected and recorded by a teacher.

*Eligible student* means a student who has reached 18 years of age or is attending an institution of postsecondary education.

*Immunization Record* is a comprehensive timeline of all vaccinations a person has received.

*Party* means an individual, agency, institution, or organization.

*Parent* means a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or a guardian.

*Personally identifiable information* includes the student's name, the names of parents or other family members, the address of the student or student's family, a personal identifier, such as the student's social security number, student number or biometric record, other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name. It also includes other information that, alone or in

combination, is linked or linkable to a specific student and could lead to identification of the student, or information requested by a person who the school district believes knows the identity of the student to whom the education record relates.

*Record* means any information recorded in any way, including, but not limited to, handwriting, print, computer media, video or audio tape, film microfilm, and microfiche.

*School Records Coordinator* means any staff member appointed by a principal, program manager, or other administrator as the person responsible for the maintenance and security of the records at the student's school or program.

*Student* means any individual who is or has been in attendance at a school district and regarding whom the school district maintains educational records.

### **III. Access to Student Education Records**

Information contained in student education records shall be provided to persons and agencies as follows:

#### **Parents<sup>1</sup> and Eligible Students**

Parents of students have the right to inspect and review education records of their children. If any material or document in the education record of a student includes information on more than one student, the parents of one of such students shall have the right to inspect and review only such part of such material or document as relates to such student.

Eligible students also have the right to inspect and review their own education records. Parents or eligible students shall be allowed to inspect and review the education records of their children (or for eligible students, their own records) within a reasonable period of time, and in no case longer than 45 calendar days following the school district's receipt of the request.

If requested, the school district shall provide explanations and interpretations of the records. If the parent or eligible student cannot inspect and review the student's education records, the school district will provide copies of the requested records or make other arrangements for inspection and review of the records. Records must not be destroyed if there is an outstanding request for the records. Although records must remain within school district control, they may be copied or reproduced by or for the parent or eligible student at their own expense.

Parents and eligible students also have the right to an opportunity for a hearing to challenge the content of their child's education records, as explained further below.

All students have the right to know what is in their educational records. The right to know may not include the right to visual access.

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<sup>1</sup> As noted in the definition section above, the term "Parent" is defined broadly.

- A. Senior high school students may, in the presence and under the supervision of an authorized member of the school staff, inspect and review those portions of the student record containing:
  - 1. Basic identifying data.
  - 2. Attendance records and reports.
  - 3. Academic transcripts and other records of academic performance.
  - 4. Information regarding co-curricular activities, awards, and honors.
  - 5. Standardized test scores.
  
- B. Students under 18 years of age have the right to know of the existence of the following types of information in their records, but at the discretion of the professional staff member granting access, may be denied the opportunity to inspect and review such records:
  - 1. Psychological or personality test scores and evaluations.
  - 2. The student health record.
  - 3. Copies of letters or other forms of communication between the:
    - a. School and parents or guardians.
    - b. School and public or private agencies.
    - c. School and other schools, offices, or departments.
    - d. Members of school staffs.

#### **IV. Release of Education Records**

- A. The District must obtain the consent of parents or eligible students to disclose student records or personally identifiable information to any party, with exceptions as noted in federal and state law and as specified below.
  - 1. Written consent must be dated and signed by the person giving the consent. Consent may be in electronic format if it identifies and authenticates a particular person as the source of the electronic consent. The consent statement shall:
    - a. Identify the specific records or specific information to be disclosed;
    - b. Specify the purpose for the disclosure; and
    - c. Identify the party or class of parties to whom the disclosure may be made.

If requested, a copy of the records disclosed shall be provided to the parent or eligible student.

- B. To Whom Education Records or Personally Identifiable Information may be Disclosed:
  - 1. Without Written Consent, But Requiring Notification - Written consent is not required for the disclosure of education records and personally identifiable information in response to a subpoena or a court order. Notification must be prior to compliance. (In all cases, school personnel should consult with the Seattle School District General Counsel prior to disclosure).

2. Without Written Consent or Notification – Records may be disclosed to the following individuals, institutions or agencies, in the absence of consent from the parent or eligible student:
- a. School officials of Seattle School District, including teachers, who have a legitimate educational interest. “School officials” may include other parties to whom the District has outsourced institutional services or functions provided that their services or functions are under the direct control of the District. The District must use reasonable methods to ensure that school officials access only those records in which they have legitimate educational interests.
  - b. School officials of any school (located inside or outside the District) to which a student transfers or will transfer.
    - 1) In those instances, the enrolling school shall be provided with the student's academic, special placement, immunization history (if maintained in student's cumulative file) and discipline records within two school days of receipt of the request.
    - 2) For students who transfer to another school district, if the student has an outstanding fee or fine, the Seattle School District may withhold the student's grades, diploma, and the official transcript until the fee or fine is discharged. The enrolling school district shall be notified that the transcript is being withheld due to an outstanding fee or fine. At the time of transfer of the records, the parent or eligible student may receive a copy of the records at his/her expense if requested and shall have an opportunity to challenge the contents of the records.
    - 3) Parents shall be advised through the annual SEATTLE PUBLIC SCHOOLS (SPS) – NOTIFICATION OF RIGHTS UNDER THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) and OPT-OUT FORM that student records shall be released to another school where the student has enrolled or intends to enroll.
  - c. Agencies or officials to whom student's applications for financial aid are submitted.
  - d. Authorized representatives of the Comptroller General of the United States, the Secretary of Health, Education, and Welfare; the United States Commissioner of Education; the Director of the National Institute of Education; or the Assistant Secretary for Education
  - e. Authorized representatives of state educational authorities.
  - f. Organizations conducting studies for or on behalf of Seattle School District or other educational agencies or institutions. Access may be granted only for the information needed and only with the recommendation of the Evaluation Services Department, and the approval of the appropriate assistant superintendent(s), or the superintendent.

- g. State and local officials or authorities to which such information is specifically required to be reported or disclosed pursuant to federal or state statute. (Example: Referral of truant students to juvenile court; reporting cases of child abuse to proper authorities; transfer of disciplinary records with respect to a suspension or expulsion of a student to any private or public school in which the student is subsequently enrolled, or seeks and intends to enroll; to the appropriate law enforcement agency regarding sex offender registration requirements).
- h. Accrediting organizations, in order to carry out their accrediting functions.
- i. Parents of dependent, adult students as defined by section 152 of the Internal Revenue Code of 1954 (the student qualifies and is reported as a dependent student on Federal Income Tax Returns).
- j. Appropriate persons, in connection with an emergency, if knowledge of the information to be released is necessary to protect the health and safety of the student or other persons. In determining the necessity of release, the following factors are to be considered:
  - 1) The seriousness of the threat to the health or safety of the student or other persons.
  - 2) The need for such records to meet the emergency.
  - 3) Whether the persons to whom records are released are in a position to meet the emergency.
  - 4) The extent to which time is of the essence in meeting the emergency.

Note: When releasing information under this health or emergency safety exception, the person who discloses this information must record in the student education record the articulable and significant threat to the health or safety of a student or other individual that formed the basis for the disclosure, as well as the parties to whom the disclosure was made.

- k. Directory Information: Directory information, as defined above, may be released publicly without consent upon the condition that the parent or eligible student be notified annually of the school's intention to release such information and be provided the opportunity to indicate that such information is not to be released without prior consent.
  - 1) The District shall not release directory information if the parent or eligible student has provided written notice to the District that any and all of the information designated as directory information shall not be released.
  - 2) Schools and Programs shall maintain lists of valid requests from parents and eligible students to opt out of the disclosure of directory information.
  - 3) Directory information shall not be released for commercial, research, or solicitation purposes, unless in accordance with the procedures described further below.

## **V. Procedures for Disclosure of Records**

- A. Identifying records for disclosure when a request for records is made: staff receiving the request shall ensure that this policy is complied with in every respect. The school's records officer shall be made aware of the request and then ensure that there is a valid basis for releasing records. If the request does entitle a person or entity to a student's educational records, the school records officer shall be primarily responsible for ensuring that all records are searched and gathered, consulting with the Office of General Counsel as necessary. A search of e-mail databases, as well as other records, shall be made to ensure the complete recovery of any and all "education records" that are subject to the specific request.
- B. When it is determined that a record may be disclosed, the following steps must occur:
1. Forms or letters shall accompany the transmittal of education records or personally identifiable information to individuals or entities outside the District, and must include a statement indicating that the enclosed records may not be shared with any other party without the consent of the parents or eligible student.
  2. In each case of release of education records or personally identifiable information, a copy of the consent form, notification form, or other similar document is to be made a part of the student record. School personnel should also keep similar copies of the forms on file in connection with the transmittal of student records.
  3. A notation of the time of access and the name of the staff member present, as well as a notation of the legitimate interest the party had in requesting or obtaining the information, shall become part of the student record (this may include the email or fax cover sheet).

Exceptions: A record need not be made of requests for education records if the request was from, or the disclosure to:

- a. The parent or eligible student;
- b. A school official who has legitimate educational interest in such records as specified in this procedure;
- c. A party with written consent from the parent or eligible student;
- d. A party seeking directory information;
- e. Or if otherwise not required by Court Order

C. Records for Transmittal – Preparation and Release of Records for Transmittal:

1. To another school within the Seattle School District – Determine the appropriate items for transmittal:
  - a. Do Not Forward – Remove the following items from the student's folder before transmittal:
    - 1) Data, forms, and documents having relevance only in the former school. (Examples: locator cards, duplicate attendance cards, old data processing forms.)
    - 2) Psychological or personality tests that are three years old or older.

- 3) Letters and other forms of communication having no significance for the new school.
- b. Items for Transmittal – These items may be forwarded to the requesting school:
- 1) The elementary permanent record.
  - 2) A copy of the secondary transcript.
  - 4) Any Student Placement documents indicating transfer history.
  - 5) Records of disciplinary actions.
  - 6) A copy of the most recent attendance card.
  - 7) Legal documents including release, notification, and access forms.
  - 8) Other information and data – that will be necessary to preserve the educational welfare of the student in the new school.
  - 9) Immunization Record, if maintained in the student’s cumulative file.
- c. If the student formally withdraws with the intention of enrolling in another Seattle Public School:
- 1) Do not send the records until a request for records is received from the school.
  - 2) When a request for records is received, use the existing procedures.
- NOTE:** No consent or notification is required.
2. To a private school, a parochial school, a charter school, or a school outside the Seattle School District – Determine the appropriate items for transmittal:
- a. The transmitted student records and personally identifiable information shall be limited to:
- 1) A copy of the elementary permanent record.
  - 2) A copy of the secondary transcript.
  - 3) Standardized test scores that continue to be valid and relevant.
  - 4) Consent, notification, and access forms.
  - 5) Records of significant performance, awards, or honors.
  - 6) Records of disciplinary actions.
  - 7) Other information and data – that will be necessary to preserve the educational welfare of the student in the new school.
  - 8) Immunization Record, if maintained in the student’s cumulative file.
- b. If the student formally withdraws with the intention of enrolling in a public school outside Seattle School District, a charter school, or a private or parochial school:
- 1) Hold the student records until a request for records is received.
  - 2) At the time of withdrawal, issue the usual withdrawal form(s).
  - 3) When the request for records arrives:
    - a) Delete extraneous material from the folder.

- b) Keep a copy of the request for records with the residual student records.
  - c) Forward a copy of the record as requested, with Transmittal of Student Records Form (retain copy of the form).
3. To Outside Agencies – Material to be released shall be strictly limited to meet the specific purposes of the release.

Student Information to the Military. The military may request, and is entitled to receive, the names, telephone numbers, and addresses of secondary school students under the No Child Left Behind Act of 2001 (“contact information”). A Seattle School District “opt-out” form will offer the choice to parents/guardians and students to not release contact information at all, or to release information to anyone, except the military. Parents/guardians and students may “opt-out” at any time for one or more years, and may change their opt-out status at any time. However, the military typically requests this information in October of each academic year, thus information may be released to the military if the opt-out takes place after October 1.

District high schools shall have opt-out forms available for students and families to review, including having a special military opt-out form in school career centers.

An annual report shall be produced to the Superintendent that indicates, by school and grade level how many students opted out under each available category.

4. Response to a Subpoena or a Court Order – Immediately call General Counsel to obtain advice. If you are advised by the General Counsel to respond as ordered:
- a. Assemble necessary information. (Do not include more than has been required.
  - b. Call a parent or verbally notify the student if he or she is 18 years of age:
    - 1) Inform the parent (or student, if age 18) that records will be released in response to a subpoena or court order.
    - 2) Insert a signed, dated statement in the student record indicating receipt of the subpoena or court order, the date of receipt, the call to the General Counsel and advice received, and the notification of the parent or eligible student.
    - 3) Respond to the subpoena or court order as directed.

If a parent or the eligible student cannot be reached by telephone, send a brief note to the parent or eligible student indicating that records will be released in response to a subpoena or court order. This notification should be sent BEFORE responding to the subpoena or court order. A copy of the letter is to be placed in the student’s record.

#### D. Release of Student Records and Personally Identifiable Information To and Upon the Request of Non-school Persons or Agencies

1. If a Consent for Release of Information form is received:
  - a. Assemble only the specific information requested.
  - b. As noted above, file the consent form in the student record.
  - c. Send information accompanied by the form, Transmittal of Student Records.
2. If a Consent for Release of Information form is not received, notify the person or agency requesting information that a Consent for Release of Information form will be required before records can be released.

E. Procedures for Release of Directory Information

1. Non-District persons or agencies who meet specific criteria may receive Directory Information of students if:
  - a. They are engaged in cooperative activities that directly serve or *provide operational support for the school or program, provided:*
    - 1) No Directory Information shall be provided of students whose parents have declined to have such information released.
    - 2) Disclosure of Directory Information shall be authorized only by school principal or program manager with due consideration given to other provisions contained in this section.
    - 3) Disclosure of Directory Information shall be limited to only that information deemed necessary to accomplish the planned project.
  - b. Their purpose is to inform students and/or parents of students of educational, training, or career opportunities provided:
    - 1) No student's name shall be listed whose parents have declined to have Directory Information released.
    - 2) Directory Information will not be used for commercial purposes.
    - 3) Production of the requested Directory Information can be accomplished without deferring or displacing any other needed District service.
    - 4) The person or agency receiving Directory Information shall reimburse the District for all costs attendant to its production, as estimated by the District prior to production.
    - 5) The person or agency requesting Directory Information shall provide information or exhibits demonstrating that:
      - a) The opportunities to be announced or information to be provided have significant merit and will be of interest to a significant portion of the target population, and
      - b) Personal contact by mail, telephone or in person, with the target population will result in a minimum invasion of privacy, and
      - c) The Directory Information provided will not be shared with any other person or agency, will not be used for other than the purpose stated in the request, and will be destroyed when no longer of use--or prior to a designated date which, in no case, shall be more than one year from the

- date of issuance, and
- d) Any information or literature to be sent to students and/or parents shall be factual, straightforward, and free of misrepresentation.
- 6) The Associate Superintendent for Teaching and Learning shall be:
- a) The authority for issuing Directory Information to non-District persons or agencies for the purpose of disseminating educational, training, or career information.
- b) Empowered to waive requirements (3) and (4) above, if the planned project has exceptional merit and will positively benefit the subject students and/or parents or the District to the degree that it could be considered a worthy District project.
- c) Their purpose is to provide students and parents of students with useful information or to inform them of opportunities not related to education, training or careers, provided:
- (1) The information to be disseminated shall not espouse a particular philosophical, religious, political, economic or social point of view, and
- (2) The proposed project shall be a reasonable and proper activity for the District to support and shall warrant the allocation of public resources required to provide the requested Directory Information, and
- (3) Disclosure is not for commercial purposes, i.e., a primary purpose for using Directory Information is to sell or advertise a product or service for financial gain.
- d) Their purpose is to conduct research of a target population, provided the research project receives District approval in accordance with District guidelines for research projects.
- e) They are, conducting an official investigation of Seattle School District operations, provided:
- (1) Such disclosure is in accordance with the advice of the School District general counsel, and
- (2) Final authority for disclosing Directory Information shall be reserved to the Superintendent.
2. In all other cases, the Superintendent or designee shall determine whether Directory Information is to be disclosed, based upon principles inherent or implied in the foregoing procedure.

Parents and eligible students shall be notified annually of their right to inspect and review the records of their children and their other rights under the Family Educational Rights and Privacy Act, 20 U.S.C. 1232g, through the SEATTLE PUBLIC SCHOOLS (SPS) – NOTIFICATION OF RIGHTS UNDER THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) and OPT-OUT FORM.

## **VI. Confidential Health Records**

Confidential health records should be stored in a secure area accessible only to the school health care provider, unless an appropriately executed release under Ch. 70.02 has been obtained. Such records are also covered by the Family Education Rights and Privacy Act, permitting parent access to review and otherwise exercise FERPA rights regarding the records. There is a higher standard of confidentiality and minor student's rights of privacy for records pertaining to HIV, sexually transmitted diseases, drug or alcohol treatment, mental health treatment, family planning or abortion. The releases for information regarding sexually transmitted diseases, HIV and drug or alcohol treatments are more restrictive than ordinary medical releases, and should be required before disclosure.

## **VII. Challenges and Hearings**

At the time of inspection and review, the parent or eligible student granted access to records may challenge any record directly related to the student that they consider inaccurate, misleading, or in violation of the student's right to privacy and may demand correction or deletion. Custodians (teacher, counselor, nurse, psychologist) may honor such demands by correcting or deleting records which are inaccurate, misleading, or in violation of the student's right to privacy provided that the senior custodian (principal or department head) concurs.

If the demanded correction or deletion is denied by the senior custodian, the parent or eligible student may request an informal hearing before the Superintendent or designee, which hearing shall be held, unless agreed to otherwise by both the District and the parent or eligible student, within 30 days of the receipt of such request. During the hearing the Superintendent or designee shall review the facts as presented by the parent or eligible student and the custodian and decide whether or not to order the demanded correction or deletion. The Superintendent or designee shall send his/her written decision to the parent or eligible student within 30 days of the hearing. The decision of the Superintendent's or his/her designee is final.

Parents or eligible students challenging the appropriateness and accuracy of student records may insert a written explanation of their objections in such records.

## **VIII. Maintenance of Student Records**

Each building principal, program manager, or other administrator shall designate a person to serve as the school or program records coordinator. The student records officer is the custodian of all education records of students at his or her school.

The school records officer shall:

- A. Maintain only those records authorized by these procedures;
- B. Safeguard education records from unauthorized use and disposition;
- C. Maintain a record of requests to access education records and the disclosure of such records in accordance with the law and these procedures;
- D. Honor access requests for parent or eligible student in accordance with the law and this procedure;

- E. Delete or correct records upon approval of the principal or other individual as required by law;
- F. Follow the records schedule and procedures established by the District Records Manager;
- G. Transfer, destroy and expunge records as permitted;
- H. Conduct informal hearings and grant or deny approval of corrections or deletions requested by parents or eligible students; and
- I. Upon transfer of the student to the next level (elementary to middle school, middle school to high school) or upon graduation or transfer outside the District, remove for retention, preservation or destruction in accordance with applicable disposition procedures any records no longer pertinent to educational program placement.

The District's records manager shall provide overall supervision of student records management and control and shall enforce the student records policy and the administrative procedures.

The District will use an array of methods to protect records, including passwords, physical controls (such as locked cabinets), technological controls (such as role-based access controls for electronic records) and administrative procedures.

## **IX. Disposition of Student Records**

The permanent student record shall serve as the record of the student's school history and academic achievement. Within ten days after receiving a request, the District will furnish a set of unofficial educational records to the parent of a student transferring out of state who meets the definition of a child of a military family in transition. When a student transfers to another school in the District, the student's cumulative folder and supplemental records shall be transmitted to the other school. When a student transfers to a school outside of the District, the records coordinator shall purge the cumulative folder of all nonofficial, extraneous information. A copy of all records will be sent to the requesting school, unless the records are withheld for an outstanding fee or fine as specified above. The cumulative folder and supplemental records for a student who leaves the District shall be maintained for two years after discontinuance of enrollment in the District.

In all cases, the student's official record shall be retained in perpetuity by the District. At the time a student graduates from school or ceases to need special educational services, the parent or eligible student shall be informed that record information regarding the disabling condition is no longer needed.

When informing the parent or eligible student about his/her rights regarding such records, the District shall advise the parent or eligible student that the information may be needed by the student or the parent to establish eligibility for certain eligible benefits, e.g., social security. At the parent's or eligible student's request, the record information relating to the disabling condition shall be destroyed.

A parent or eligible student, at his/her expense, may receive a copy of all records to be transmitted to another district.

## **X. Large Scale Destruction of Student Records**

Annually, the records coordinator shall destroy those student records which have met their specified retention period and submit the destruction notice to the records manager. The records coordinator makes sure the records are securely destroyed.

## **XI. Electronic Records**

Electronic records (including e-mail and web content) created and received by the District in the transaction of public business are public records for the purposes of RCW 40.14 and will be managed consistent with all of the laws and regulations governing the retention disclosure, destruction and archiving of public records. The District will manage electronic records according to the same provisions as paper documents as set forth in the records retention schedules. Electronic records will be retained in electronic format and remain usable, searchable, retrievable and authentic for the length of the designated retention period.

The District will retain records in compliance with the General Records Retention Schedule For School Districts And Educational Service Districts in Washington State found at: [www.sos.wa.gov/archives/recordsretentionschedules.aspx](http://www.sos.wa.gov/archives/recordsretentionschedules.aspx) .

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