

**WALLA WALLA COMMUNITY COLLEGE**  
**FERPA**  
**ADMINISTRATIVE PROCEDURE 7345**

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**I. ANNUAL NOTIFICATION**

- A. Once per year, the Walla Walla Community College (WWCC) Registrar will email all currently enrolled students a copy of their FERPA rights.
- B. FERPA rights will be located on the college website.
- C. For students enrolled at a Department of Corrections (DOC) campus location, a printed copy of their FERPA rights will be provided by staff.

**II. INSPECTION OF EDUCATION RECORDS**

- A. A student may request inspection of their education record by submitting a written, dated request, specifying the desired records for review.
  - 1. The written request should be delivered in person to the Office of Admissions and Records (OAR) or electronically by emailing the request to [registrar@wwcc.edu](mailto:registrar@wwcc.edu).
  - 2. Approval of requests and subsequent inspection of records shall occur within forty-five (45) days of receipt of the request.
- B. Education record(s) will be made available to the student, according to the following guidelines:
  - 1. The office will contact the student to make an appointment to view the records in person or via an online meeting with video capability.
  - 2. The office will review the records in advance of the appointment and remove any records for which the college retains the right to refuse access (see section II.C.).
  - 3. The student must show valid government issued photo ID before viewing the records.
  - 4. A designated staff person will supervise the review of the contents of the record to ensure no records are removed at the time of inspection.
  - 5. Students who live more than 50 miles from the WWCC Walla Walla or Clarkston Campus, and do not have video streaming capabilities, or for whom the need to travel to the college represents a hardship that would effectively prevent the student from inspecting and reviewing the record, may request that copies of the record be mailed to them.
    - a. The student should declare in the written request that they are unable to view the record in person and should list the address to which the records should be sent.
    - b. The request must specify as closely as possible the desired records and must be signed and dated.
  - 6. Once a student has requested access to their education records, those records cannot be destroyed until inspection and review have been provided.
  - 7. Although the college will not deny a student access to their education records:
    - a. The college will not release back to the student original transcripts from other academic institutions or original test score reports. These must be requested from the original institution.
    - b. During the review process, the college typically does not provide copies of any contents of the student record. Students are free to make notes concerning the contents of the record during their review.
- C. The college reserves the right to refuse access to the following records:
  - 1. Financial statements submitted by a parent, guardian, or spouse.

2. Records that are excluded from the FERPA definition of education records.
3. Records containing an exam or set of standardized test questions.
4. When a record contains information about more than one student, the student may inspect and review only that portion of the record which relates to them.

### **III. AMENDMENT OF EDUCATION RECORDS**

- A. Students have the right to request the amendment of their education records if they believe the content to be inaccurate, misleading, or otherwise in violation of their privacy rights under FERPA.
  1. The request for amendment must be made in writing to OAR and must be signed and dated by the student.
    - a. The request must include sufficient information to identify the challenged record and a statement of the reason for the request.
  2. Within forty-five (45) days of receipt of the written request, the applicable records custodian will decide whether to amend the record as requested.
    - a. If the request is found to be warranted, the amendment will be made and the student will be notified in writing.
    - b. If the request is not found to be warranted, the student will be notified in writing of the reason for the decision and will be advised of the right to a hearing to challenge the content of the record.
- B. Request for Hearing
  1. The request for hearing must be made in writing to the Registrar and must be signed and dated by the student.
    - a. The request must include sufficient information to identify the challenged record, and should, if possible, include copies of the request for amendment and the college's written decision.
  2. The hearing will be held within a reasonable time after the request is received (normally within thirty (30) days), and the student will be notified at least five (5) days in advance of the date, time, and place of the hearing.
  3. The Vice President of Student Services or their designee will designate a hearing officer who does not have direct interest in the outcome.
    - a. The hearing officer will have the discretion to determine whether the hearing should be conducted in person or virtual means.
  4. The student and custodian will each have full and fair opportunity to present relevant evidence at the hearing.
    - a. The student may, at the student's expense, be assisted or represented by one or more individuals, including an attorney.
  5. The decision will be issued to the student in writing within a reasonable period of time after the hearing (normally within one (1) week).
    - a. If the hearing officer decides that the amendment is warranted, the custodian will amend the record accordingly and notify the student in writing.
    - b. If the hearing officer decides that the amendment is not warranted, the student will be notified in writing of the right to place a statement in the record commenting on the contested information.

#### IV. AUTHORIZATION FOR RELEASE OF EDUCATION RECORDS TO THIRD PARTY

A. A student may authorize the release of their education record to a third party providing the request is made in writing, signed, and dated. The [Release to Access Education Records](#) form can be obtained online or through OAR.

1. If a student completes the form online, they must log in with their WWCC Student Account. By using their student email address and password, this replaces a physical signature.
2. This request authorizes WWCC to release education records to third parties; it does not obligate the college to do so.
3. WWCC reserves the right to review and respond to requests for release of education records on a case-by-case basis.
4. This request does not allow the individual to perform actions on behalf of the student.
5. Release authorizations will be noted in the student's record.
6. Release authorizations are considered valid for two (2) years from the date of submission

B. Information to be collected includes the following:

1. Student First and Last Name
2. Student ID Number
3. Students must indicate what student record information can be shared with the specified third party. The options include:
  - a. Academic Information - transcript, credit hours enrolled/earned, grades/GPA, class schedule, academic progress, enrollment status, etc.
  - b. Financial Aid Information – financial aid awards, application data, disbursements, eligibility, academic progress status, etc.
  - c. Loan Information - college maintained loan disbursements, billing and repayment history - including credit reporting history, balances, collection activity, etc.
  - d. Student Account Information - billing statements, charges, credits, payments, past due amounts, collection activity, financial holds, etc.
  - e. If other is selected, the student must specify which records can be released.
4. Name of third party to whom the records may be released.
5. Approved email address(es) of the specified third party to which we can communicate with. This information is optional to provide. However, information will not be provided electronically without an approved email address as listed on the form.
6. The option for providing a “pass phrase” is included to assist confirming individual's identity over the phone. If this is not provided, information will not be provided to anyone other than the student when talking to individuals over the phone.

C. Power of Attorney

Education records may be disclosed to a third party who has a properly executed power of attorney for a student.

1. The power of attorney must specifically authorize access to academic records or be a general power of attorney that covers any and all documents.
2. If all legal requirements are met, the individual listed on the power of attorney will be treated in the same manner as the student.

## V. IDENTITY VERIFICATION

34 CFR § 99.31(c) states FERPA, “require[s] that the school use reasonable methods to identify and authenticate the identity of parents, students, school officials, and any other parties to whom the school discloses personally identifiable information from education records.” In following this guidance, WWCC school officials must confirm the identity of the student with whom they are communicating whether in person or electronically (phone, email, chat, etc.).

### A. Student Communication

When communicating with a student, school officials must view the student’s government issued or school issued ID OR use at least three (3) of the following to verify the student’s identity:

1. Student Identification Number (SID)
2. Address
3. Phone number
4. Personal email address
5. Class information

### B. Authorized Third-Party Communication

When communicating with a third party who is listed on a release form as indicated in section IV of this procedure, school officials must view the third party’s government issued ID OR the third party may provide the pass phrase as noted on the release form (see section IV. B. 6.), if communication is via telephone, the pass phrase must be provided.

### C. Email Communication

If a WWCC school official wishes to communicate with a student via email, it is preferred that the student’s WWCC student email is used. However, the personal email listed in the student’s educational record is also acceptable. If a different email is used, nothing regarding the student’s educational record may be included in the email.

### D. Personally Identifiable Information (PII)

PII should never be released over the phone or via email. Under no circumstance should PII or protected demographic information be provided to an individual who does not otherwise meet the specifications of a school official with legitimate educational interest (see definitions listed in [FERPA Administrative Policy 7345](#)). PII information includes:

1. Social Security Number (SSN) or ITIN
2. Date of Birth
3. Disability Status

## VI. DISCLOSURE WITHOUT STUDENT CONSENT

A. The college may disclose a student’s education records, which may contain personally identifiable information, without the student’s prior written consent only under the exceptions permitted by FERPA. When such requests are made, the Registrar is responsible for ensuring records are distributed in accordance with state and federal regulations and a note is added to the student’s record if applicable. These exceptions include, but are not limited to, disclosure of education records to the following:

1. School Officials with a legitimate educational interest in the specific records as defined in [FERPA Administrative Policy 7345](#).
  - a. Every WWCC employee who works with student records is required to complete FERPA training upon hire and follow the college’s FERPA policy and procedure.
  - b. Students workers are allowed to have access to student records if their position requires it. In such cases, students are required to sign the

“Confidentiality of Student Records Guidelines”. This document is provided by HR upon hire.

2. Federal and state officials requiring access to educational records in connection with the audit and evaluation of a federally- or state-supported educational program or in connection with the enforcement of the federal or state legal requirements.
  - a. In such cases the information required shall be protected by the federal or state official in a manner which will not permit the personal identification of students and their parent(s) to other than those officials.
  - b. Such personally identifiable data shall be destroyed when no longer needed for such audit, evaluation or enforcement of legal requirements.
3. Agencies, such as the National Student Clearinghouse, or individuals requesting information in connection with a student’s application for, or receipt of, financial aid.
4. Accrediting organizations in order to carry out their accrediting functions may access information limited to those functions.
5. Organizations conducting studies for, or on behalf of, the college for purposes of developing, validating or administering predictive tests, administering student aid programs, and improving instruction.
  - a. Such studies shall be conducted in a manner that will not permit the personal identification of students by persons other than representatives of the organizations.
  - b. Such information shall be destroyed when no longer needed for the purposes for which it was provided.
6. Information from educational records may be released to appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health or safety of a student or other person(s).
7. The Department of Defense for military recruiting purposes, as per the Solomon Amendment (under 32 CFR 216), unless a student has requested to restrict their directory information.
8. Persons in compliance with a judicial order or a lawfully issued subpoena, provided that the college makes a reasonable attempt to notify the student in advance of disclosure.
9. A court or administrative agency in the event of legal action between the college and a student, provided that the college makes a reasonable attempt to notify the student in advance of disclosure.
10. Veterans Administration officials (under 38 USC 1790(c)).

## **VII. RECORDS OF DECEASED STUDENTS**

Education records are no longer protected under FERPA after a student’s death; consequently, the disposition of records pertaining to a deceased individual is not a FERPA issue but a matter of institutional policy. WWCC maintains full discretion in deciding whether, and under what conditions, education records of deceased students should be disclosed.

- A. In general, the college will not release education records without written authorization of the executor/executrix of the deceased student’s estate or next of kin, if an executor/executrix has not been appointed.
- B. A request made by someone other than executor/executrix or next of kin for the education records of a deceased student must submit a written request to the Registrar specifying the requester's name, relationship to the deceased, and reason for the request.

Additionally, the requester must provide a death certificate or obituary notice as proof of death if the Registrar's office has not been notified of the death previously.

- C. The request will be reviewed by an appropriate set of individuals that will include the Registrar and the Assistant Dean of Enrollment Services, who will make the determination on a case-by-case basis.

### VIII. DISCLOSURE OF DIRECTORY INFORMATION

Under FERPA, Directory Information (see definitions in [FERPA Administrative Policy 7345](#)) may appear in public documents and may be disclosed to any person or entity without student consent. WWCC generally releases Directory Information upon request. However, the following caveats should be noted:

- A. The Registrar is responsible for administering requests for non-disclosure and for overseeing disclosure of Directory Information. Consequently, all school officials are advised to consult with the Registrar before releasing Directory Information.
- B. The college reserves the right to refuse to release Directory Information to any person or entity at any time.
- C. School officials are never required to release Directory Information. Any school official who has concerns about a request should decline to provide the information and consult with the Registrar.
- D. WWCC does NOT release lists of Directory Information to any person or agency making unsolicited requests.

### IX. REQUEST TO RESTRICT DIRECTORY INFORMATION

WWCC assumes that failure on the part of any student specifically request the withholding of Directory Information (see definitions in [FERPA Administrative Policy 7345](#)) indicates individual approval for disclosure.

- A. Students wishing to be excluded from the student Directory Information as defined in Public Law 93-380 (Education Amendments Act of 1974), may update their privacy restrictions in their [ctcLink account](#) to seal their records. For assistance with updating their privacy restrictions, students may contact OAR or refer to this [webpage](#) for detailed instructions. Please note the following:
  1. By sealing a student's records, WWCC is unable to verify degrees, graduation, or any other requested information.
  2. Request for non-disclosure applies to ALL Directory Information and cannot be applied selectively to certain items of Directory Information.
  3. Request for non-disclosure does not include the right to be anonymous in the classroom or other class environment or to impede routine classroom communication and interactions.
  4. Directory Information or other education records of students who have requested non-disclosure may be released under any of the exceptions permitted by FERPA, as outlined in section VI. Disclosure Without Student Consent above.

<b>Policy Contact:</b> <u>Vice President, Student Services</u>
<b>Approved by (Department/Body):</b> <u>Dr. Chad Hickox, President</u>
<b>Date Originally Approved:</b> <u>July 9, 2024</u>
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