

CODE OF CONDUCT & EXPECTATIONS		
Disclosure of Student and Employee Information/Records	Policy #	2.6
	Revised	03/01/2023

2.6.1 Overview

The Organization adheres to all applicable federal, state and local regulations including but not limited to the Family Educational Rights and Privacy Act of 1974 (FERPA). All employees are required to comply with all aspects of System and University FERPA policy at all times. FERPA requires that students are provided access to their educational records upon request, and prohibits the System and University from releasing information to third parties outside of the University and System unless there is: written consent to release information, receipt of a lawful subpoena, or legitimate educational interests required to carry out official job responsibilities. For additional details, please review the applicable University FERPA guidelines.

The Organization’s computer systems contain confidential student and employee information, including personal information, financial data, and academic records. Federal and state laws prohibit the unauthorized disclosure of this information and impose penalties on any institution or person who violates the law by making unauthorized disclosure or misusing this confidential information.

Unauthorized disclosure, misuse of any information – even if unintentional – are considered serious breaches of this policy and must be reported immediately to any of the following:

- Direct supervisor or any member of management
- HR Business Partner
- Compliance Officer
- Ethics hotline (855)582-3769
- www.ethicspoint.com

2.6.2 Handling and Disclosing Information

Each employee is expected to understand and safeguard the privacy of student information, and follow the guidelines described in this policy:

- Employees may not access, alter, or disclose any student record without a legitimate job-related reason as defined by their position description
- Employees must comply with federal and state laws, including but not limited to, the Family Educational Rights and Privacy Act (“FERPA”), which prohibits the disclosure of a student’s educational records (other than Directory Information) without the student’s written consent. Directory Information, which may be disclosed without a student’s consent, is limited to:
 - The student’s name, and other public information as defined in the University General Catalog
 - Alumni addresses, telephone numbers, voluntary addresses, and any other personal information that is provided voluntarily by alumni.

All requests for release of student records must be directed to and authorized by the Registrar. Under narrow and limited circumstances, federal and state laws permit the release of student records to:

- Officials of other institutions in which the student seeks to enroll
- Organizations providing financial assistance

- Accrediting agencies carrying out accreditation functions
- Comply with a judicial order
- Protect the health or safety of students or other persons in the event of an emergency

The following inquiries for information must be directed to the Registrar, and should not be released:

- Students on “Privacy Act Lockfile”
- Subpoenas for student records

2.6.3 Handling and Disclosing Employee Information

Human Resources (HR) is the only office that maintains official personnel records for each employee. Information, documents and personal records include but are not limited to employment application, resumé, performance appraisals, disciplinary documents, and other official records. HR is authorized to provide employment information for current or former employees. Please direct all requests for employee information, including reference checks, to the Human Resources department and documents will be provided in a timely fashion as required by law.

Personnel and Payroll records are available to individual employees (current and former) or an official employee representative, and other agents upon request to the Human Resources department and documents will be provided in a timely fashion as required by law.