STUDENTS

Elementary, Middle, and High School

Records and reporting

1. Each student's official school records shall include the following:

   A. Records to be retained permanently
      1) name and address of parent(s)
      2) verification of date and place of birth
      3) copy of social security card
      4) dates and record of attendance
      5) course enrollment and grades
      6) test data
      7) date of graduation or withdrawal

   B. Records of verifiable information to be retained during the student's school career
      1) medical/health data
      2) individual psychological evaluation (gathered with written consent of parent(s))
      3) individual intelligence tests, tests for learning disabilities, etc. (counselor-administered)
      4) other verifiable information to be used in educational decision making

2. Maintaining student records
   A. Transcripts of the scholastic record shall contain only factual information. The District confines its recordkeeping to tasks with clearly defined educational ends. Teacher and staff comments on student records are to reflect matters related to student performance. Value judgments are to be excluded from the record.

   The collection, use and maintenance of student records will be based on the following definitions:

   1. Student records means all records, files, and data regarding an individual student maintained in any form by the Board of Education or its employees, except
personal notes and third-party communications maintained by school personnel solely for their own individual use and not communicated to any other person. If personal notes and third-party communications (e.g., letter from family physician) are transmitted in writing to any other person or are included in the student’s cumulative record, the notes and communications become part of the student’s record and will be treated in accordance with the regulations governing student records.

2. **Parent** means person or agency having legal custody of the student.

3. **Student** means any person who attends or has attended a program of instruction provided by the Columbus Public Schools.

4. **Eligible student** means a student or former student who has reached age 18 or is attending a postsecondary school.

5. **School Official** means any of the following: (1) a person duly elected to the Board; (2) a person certificated by the State and appointed by the Board to an administrative, supervisory, instructional or classified position; (3) a person employed by the Board as a temporary substitute for the period of his/her performance as a substitute; or (4) a person employed by, or under contract to, the Board to perform a special task such as a secretary, a Treasurer, Board attorney or auditor for the period of his/her performance as an employee or contractor.

6. **Representational consent** means the general consent to collect student information. This consent arises from state and local laws, regulations, and policies.

7. **Individual consent** means the knowledgeable consent given by a parent or eligible student for the collection of specific student information.

8. **Personally identifiable information** includes: the name of the student, the student's parent, or other family member; the address of the student; a personal identifier, such as the student's date of birth or student number; and a list of personal characteristics or other information which would make it possible to identify the student with certainty.
9. **Directory information** includes: the student's name, address, telephone number(s), date and place of birth, participation in officially recognized activities and sports, student's achievement awards or honors, student's weight and height (if a member of an athletic team), major field of study, dates of attendance ("from and to" dates of enrollment), and expected date of graduation.

**Collection of student information.** Required information will be collected and entered into student's record. A student's cumulative record must include the following:

- Birth verification
- Proof of custody/guardianship (where applicable)
- Address verification
- Immunization records
- Withdrawal information from previous Columbus Public Schools
- Last grade report/transcript
- ESL approval for initial enrollment (where applicable)
- School registration form
- Current emergency cards
- Current lunch application
- Cumulative record
- Case management file (IEP, MFE, related documents)
- Attendance card
- Columbus testing profile
- Health record
- Individual career plan (middle and high school)
- Photo record

Schools are permitted to collect and retain other student information if the following conditions are met:

- Entries in the student's record are made only by school personnel having responsibility for the student.
- Entries in the student's record are dated and signed by school personnel.
- Entries in the student's record are related to the educational development of the student.

**Record maintenance, review and security.**

**Records Management**

Student records will be kept in the office at the school building. The secretary or records clerk will be the manager for the records maintained in the school building. Principals will have the overall responsibility for the
confidentially of student records and any other personally identifiable information.

The school district's current Directory of Employees will provide a listing of the names and positions of those employees within the school district who may have access to personally identifiable data. Additionally, each school shall maintain a list of the names and positions of those employees who may have access to personally identifiable information for children with disabilities.

Records Maintenance and Microfilming

Required and permitted information shall be maintained at the high school from which the student graduates (or leaves school) for a period of five years. After this time, the required information will be microfilmed, and the permitted information will be destroyed. The microfilmed information will be maintained on a permanent basis.

Required information will be maintained at the elementary school for a student who has left the Columbus Public Schools until the student reaches the age of 21 years. At the time, the information will be destroyed.

For students with disabilities, the Individualized Education Program (IEP) will include a message indicating when personally identifiable information is no longer needed to provide educational services to the student. The information may be kept permanently unless the parent requests that it be destroyed; required information will be kept permanently. The message will remind the parent that the records may be needed by the student or the parent for social security benefits or other purposes.

Access to student records.

Each request for access to a student's record must be handled separately. Under no circumstances will district staff be required to create a record in response to an information request. Student information, other than directory information shall not be reviewed or released except as provided below or upon the written consent of the parent or eligible student.

1. Either parent (custodial and non-custodial) of the student has authority to inspect and review the education records of the student unless the school has been provided with evidence that there is a legally binding instrument, or a state law or court order granting such matters as divorce, separation or custody, which provides to the contrary.

2. School personnel who have assigned responsibility for the student, and those personnel who have a legitimate
educational interest in access. A "legitimate educational interest" is the person's need to know in order to:

- perform an administrative task required in the school employee's position description approved by the Board;
- perform a supervisory or instructional task directly related to the student's education or
- perform a service or benefit for the student or the student's family such as health care, counseling, student job placement or student financial aid.

3. Researchers who have been approved in the manner prescribed in the Research Guidelines of the Columbus Public Schools.

4. Law enforcement officers who indicate that they are conducting an investigation and that the student is or may be a missing child. Any court of law or governmental agency acting with subpoena power.

5. Representatives of Federal or State educational authorities, as permitted by law.

6. Officials of other school districts or alternate educational setting in which the student enrolls.

7. Any other persons or entities permitted access under the law.

The records manager will verify the information contained in the requested records. In no case will the time between the request for access and the parent's or student's actual access to the records ever exceed 45 days.

The school shall maintain an accurate record of all requests to disclose information from, or to permit access to, a student's education records and of information it discloses and access it permits, with some exceptions listed below. This record will be maintained with, but not as a part of, each student's cumulative school records. The record must include: 1. the name of the person who or agency which made the request; 2. the interest which the person or agency has in the information; 3. the date on which the person or agency made the request and 4. whether the request was granted and, if it was, the date access was permitted or the disclosure was made. The District will maintain this record as long as it maintains the student's education record.

The access record will not include requests for access or information relative to access which has been granted to parent(s) of the student or to an eligible student, requests for access or access granted to officials of the District who have a legitimate educational interest in the student;
requests for, or disclosures of, information contained in the student's education records if the request is accompanied by the prior written consent of a parent(s) or eligible student or if the disclosure is authorized by such prior consent; or requests for, or disclosures of, directory information designated for that student.

Procedures to Seek Corrections to Education Records

Parents or eligible students may inspect and review education records to which they are entitled to have access upon request. In some circumstances, it may be mutually more convenient for the record custodian to provide copies of records. Since a student's records may be maintained in several locations, the school principal may offer to collect copies of records or the records themselves from locations other than a student's school, so that they may be inspected at one site. If parents and eligible students wish to inspect records where they are maintained, school officials shall accommodate their wishes.

In the event that the parent or eligible student objects to any decision of a records manager regarding the correction or removal of student information, the parent or eligible student will make the objection known to the records manager. If the objection is not resolved by a discussion with the records manager, the parent or eligible student will have the right of appeal in accordance with the following procedure:

1. The Superintendent will create a review panel composed of qualified professional personnel who do not have a direct interest in the outcome of the hearing. Upon appeal by the parent (or student), the review panel will conduct a hearing.

2. Prior to the hearing, the parent or student will be notified of the date and time of the hearing, and the parent will be provided the following information:

   a. Name(s) of person(s) who will make the review decision;
   b. The right of both the appellant and records manager to be represented by an advocate of his or her choosing, to cross-examine witnesses, to present evidence, to make a tape recording of the proceedings and a written decision.

3. The written decision will be provided to all parties within thirty (30) days of the hearing.

4. If as a result of the records hearing, the school district decides that this information is inaccurate,
misleading, or otherwise in violation of the privacy or other rights of the child, the information will be destroyed or amended accordingly and the parent informed in writing.

5. If the appeal decision is not in favor of the parent (or student), the objection will be noted in the student's record and the parent (or student) will be afforded the opportunity to insert a written rebuttal into the record. Any explanation placed in the records of the child under the paragraph will be maintained by the school district as part of the records of the child as long as the record or contested portion is maintained. If the records of the child, or the contested portion, are disclosed to any party, the explanation must also be disclosed to the party.

Release of student information.

Student information will be released to persons or agencies other than those listed under access to student records only with the written authorization of the parent (or student) on standard forms. Each original authorization will be maintained in the student record folder.

No teacher, administrator, or other employee of the Columbus Public Schools shall release, or permit access to, personally identifiable data or directory information concerning any students attending the Columbus Public Schools, to any person or group for use in a profit making activity.

Parents shall be notified annually that they may object to the release of directory information pertaining to their child, and they shall be provided with an appropriate form. Upon receipt of an objection form the district shall remove the student information from any list or compilation, and notify the principal of the student's school.

Photocopies of Records

Parents and eligible students will be provided one copy of any student record at no charge. Subsequent requests for the same record will be assessed the per copy charge used throughout the district. Any other authorized person requesting copies of student records will be assessed the district’s per copy charge.

Annual Notification

Each school year, the District shall notify parents and eligible students of their rights under Ohio and Federal laws and under this policy. The notice shall specify:
1. the right of a parent(s) or eligible student to inspect and review the student's education records;

2. the intent of the District to limit the disclosure of information contained in a student's education records, except: (1) by the prior written consent of the student's parent(s) or the eligible student, (2) as directory information or (3) under certain limited circumstances, as permitted by law;

3. the right of a student's parent(s) or an eligible student to seek to correct parts of the student's education records which he/she believes to be inaccurate, misleading or in violation of student rights; this right includes a hearing to present evidence that the records should be changed if the District decides not to alter them according to the parent(s)' or eligible student's request;

4. the right of any person to file a complaint with the Department of Education if the District violates the FERPA and

5. the procedure that a student's parent(s) or an eligible student should follow to obtain copies of this policy and the locations where copies may be obtained.

An administrator shall be designated to arrange translations of the notice to non English speaking parents in their native language.

Legal references

ORC Sections 149.41;149.43
Sections 1347.01 et seq.
Section 3317.031
Sections 3319.31;3319.321;3319.33
Sections 3321.12;3321.13
Section 3331.13

OAC 3301-35-02(B)(4)(b);3301-35-03(E)
Family Educational Rights and Privacy Act, 20 USC §1232g

Regulation

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