



**Policy Name: Family Educational Rights and Privacy (FERPA) Policy**

**Policy Number: 4201**

**I. Policy Statement**

It is Hebrew Union College-Jewish Institute of Religion's policy to annually inform students of the Family Educational Rights and Privacy Act of 1974, (FERPA) as amended. The Office of the National Registrar will disclose FERPA information by publishing a notice on the College-Institute's Registrar Website and in other appropriate locations.

**II. Purpose of Policy**

This policy assures full compliance with the Family Educational Rights and Privacy Act as amended.

**III. Applicability (Audience)**

This policy applies to all members of the College-Institute including students, employees, faculty, administrators, governors, overseers, volunteers, visitors, alumni, business partners, contract vendors and other third parties with whom the College-Institute community interacts.

**IV. Definitions**

Provide definitions for any specific terminology in the document.

**V. Procedures and Implementation**

**FERPA Annual Notice to Students: Access to Student Records**

The Office of the National Registrar will disclose FERPA information by publishing a notice on the College-Institute's Registrar Website and in other appropriate locations. This annual notice shall prescribe the procedures whereby a student may make a formal request for non-disclosure of directory information, exercise the right to inspect and review education records, request an amendment of education records and obtain a copy of the College-Institute's education records policy. The Family Educational

Most Recent Revision Effective Date: 6.2022  
Initial Adoption Date: 6.2020  
Previous Revision Dates: 5.2022



Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. See Section “6” below on your right to prevent the disclosure of directory information. The FERPA rights of students are:

**(1) The right to inspect and review your education records.**

Students should submit to the registrar, dean, head of the academic department, or other appropriate official, written requests that identify the record(s) they wish to inspect. If the records are not maintained by the College-Institute official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed. All such requests must be forwarded to the Office of the National Registrar immediately for review. The Office of the National Registrar, in coordination with the appropriate College-Institute officials and/or offices, shall ensure that requests to inspect and review education records are responded to in a timely manner. All requests shall be granted or denied in writing within 45 days of receipt. If the request is granted, you will be notified of the time and place where the records may be inspected. If the request is denied or not responded to within 45 days, you may appeal to the College-Institute’s FERPA appeals officer. Additional information regarding the appeal procedures will be provided to you if a request is denied. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for students to review the records. Schools may charge a fee for copies.

**(2) The right to request the amendment of the student’s education records that the student believes are inaccurate, misleading, or otherwise in violation of the student’s privacy rights under FERPA.**

You may ask the College-Institute to amend a record that you believe is inaccurate, misleading, otherwise in violation of your privacy rights under FERPA. You should write to the College-Institute official responsible for the record, clearly identify the part of the record you want changed, and specify why it should be changed. If the college decides not to amend the record as requested by you, the College-Institute will notify you of the decision in writing and will advise you of your right to a hearing before the College-Institute’s FERPA appeals officer regarding the request for amendment. Additional information regarding the hearing procedures will be provided to you when notified of your right to a hearing.



**(3) The right to provide consent prior to the disclosure of personally identifiable information (“PII”) contained in your education records, except to the extent that FERPA authorizes disclosure without consent.**

One exception which permits disclosure without consent is disclosure to college officials with legitimate educational interests. A College-Institute official typically includes the following: (1) a person employed by the College-Institute in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); (2) a volunteer or contractor who performs an institutional service of function for which the school would otherwise use its own employees and who is under the direct control of the school with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks; (3) a person serving on the Board of Governors; or (4) a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another college official in performing his or her tasks. A College-Institute official has a legitimate educational interest if access is reasonably necessary in order to perform his/her instructional, research, administrative or other duties and responsibilities. Upon request, the College-Institute discloses education records without consent to officials of another college or school in which a student seeks or intends to enroll.

**(4) The right to appeal an alleged denial of FERPA rights to the:**

Office of the National Registrar  
Hebrew Union College-Jewish Institute of Religion  
3101 Clifton Avenue  
Cincinnati, Ohio 45220

**(5) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the College-Institute to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:**

Family Policy Compliance Office  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202-5920  
For additional information:  
[www.ed.gov/policy/gen/guid/fpco/ferpa/index.html](http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html)



**(6) The College-Institute will make the following “directory information” concerning current and former students available to those parties having a legitimate interest in the information:**

- \*name
- \*attendance dates (periods of enrollment)
- \*address
- \*telephone number
- \*place of birth
- \*photograph
- \*email address
- \*full- or part-time status
- \*enrollment status (undergraduate, graduate, etc.)
- \*level of education (credits) completed
- \*major field of study
- \*degree enrolled for
- \*participation in officially recognized activities and sports
- \*height and weight of athletic team members
- \*previous school attended
- \*degrees, honors and awards received

By filing a “Request to Prevent Disclosure of Directory Information” form with the Registrar’s Office, current and former students may request that any or all of this directory information not be released without their prior written consent. This form is available in the National Registrar’s Office and on the National Registrar’s Office website and may be filed, withdrawn, or modified at any time.

**Possible Federal and State Data Collection and Use**

As of January 3, 2012, the U.S. Department of Education's FERPA regulations expand the circumstances under which your education records and PII contained in such records — including your Social Security Number, grades, or other private information — may be accessed without your consent.

First, the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or state and local education authorities ("Federal and State Authorities") may allow access to your records and PII without your consent to any third party designated by a Federal or State Authority to evaluate a federal- or state-supported education program. The evaluation may relate to any program that is "principally engaged in the provision of education," such as early childhood education and job training, as well as any program that is administered by an education agency or institution.



Second, Federal and State Authorities may allow access to your education records and PII without your consent to researchers performing certain types of studies, in certain cases even when we object to or do not request such research. Federal and State Authorities must obtain certain use-restriction and data security promises from the entities that they authorize to receive your PII, but the Authorities need not maintain direct control over such entities.

In addition, in connection with Statewide Longitudinal Data Systems, State Authorities may collect, compile, permanently retain, and share without your consent PII from your education records, and they may track your participation in education and other programs by linking such PII to other personal information about you that they obtain from other Federal or State data sources, including workforce development, unemployment insurance, child welfare, juvenile justice, military service, and migrant student records systems.

### **Other Disclosures Permitted without Consent**

FERPA permits the disclosure of PII from students' education records, without consent of the student, if the disclosure meets certain conditions found in § 99.31 of the FERPA regulations. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student, § 99.32 of FERPA regulations requires the institution to record the disclosure. Eligible students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose PII from the education records without obtaining prior written consent of the student:

- To other school officials, including teachers, within [School] whom the school has determined to have legitimate educational interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutional services or functions, provided that the conditions listed in § 99.31(a)(1)(i)(B)(1) - (a)(1)(i)(B)(3) are met. (§ 99.31(a)(1))
- To officials of another school where the student seeks or intends to enroll, or where the student is already enrolled if the disclosure is for purposes related to the student's enrollment or transfer, subject to the requirements of § 99.34. (§ 99.31(a)(2))
- To authorized representatives of the U. S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is

responsible for supervising the university's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§ 99.31(a)(3) and 99.35)

- In connection with financial aid for which the student has applied or which the student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§ 99.31(a)(4))
- To organizations conducting studies for, or on behalf of, the school, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§ 99.31(a)(6))
- To accrediting organizations to carry out their accrediting functions. (§ 99.31(a)(7))
- To parents of an eligible student if the student is a dependent for IRS tax purposes. (§ 99.31(a)(8))
- To comply with a judicial order or lawfully issued subpoena. (§ 99.31(a)(9))
- To appropriate officials in connection with a health or safety emergency, subject to § 99.36. (§ 99.31(a)(10))
- Information the school has designated as "directory information" under § 99.37. (§ 99.31(a)(11))
- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of § 99.39. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding. (§ 99.31(a)(13))
- To the general public, the final results of a disciplinary proceeding, subject to the requirements of § 99.39, if the school determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of the school's rules or policies with respect to the allegation made against him or her. (§ 99.31(a)(14))
- To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the school, governing the use or possession of alcohol or a controlled substance if the school determines the student committed a disciplinary violation and the student is under the age of 21. (§99.31(a)(15))





## **VI. Enforcement**

Describe the means by which the policy will be enforced and ramifications of policy violation.

## **VII. Policy Owner, Management and Point of Contact Information**

Office Of The National Registrar- 513-487-3202

## **VIII. Exclusions**

None

## **IX. Effective Date**

June 2022

## **X. Related HUC-JIR Policies and Documents**

Identifies related HUC-JIR policies, Code of Regulations (bylaws), and HUC-JIR Board of Governors documents relevant to the policy.

## **XI. Notification of Policy Changes and Revision History**

The College-Institute reserves the right to change this policy at any time. State where the policies are posted

## **XII. Appendices, References, and Related Materials**

The Appendices provide links to external guidelines, or federal, state, or local laws or regulations relevant to the policy.