



Center Area School District

SECTION: PUPILS
 TITLE: STUDENT RECORDS
 ADOPTED: JANUARY 22, 2004
 REVISED:

<p>1. Purpose SC 1402(b) 1532, 1533</p> <p>SC 1409</p> <p>2. Authority Title 22 Sec 12.33 P.L. 93:380 34 CFR 99</p> <p>3. Delegation of Responsibility Title 22 Sec. 12.32, 12.33 P.L. 93-380 34 CFR 99</p>	<p style="text-align: center;">216.1. STUDENT RECORDS</p> <p>The educational interests of the pupil and of society require the collection, retention, and use of information about individual pupils and groups of pupils. The welfare and progress of pupils is inextricably related to the maintenance of a thorough and efficient system of public schools; the latter cannot be achieved nor assessed in the absence of appropriate information about the former.</p> <p>It is no less the interest of society to protect the right of each of its members against an unwarranted invasion of privacy. The primary purpose of pupil record keeping shall be the educational welfare and advancement of the pupil.</p> <p>The Board of School Directors has primary responsibility in this district for the compilation, maintenance, access to and security of pupil records. Only records mandated by the Commonwealth or federal government or specifically permitted by this Board may be compiled by the staff.</p> <p>The Superintendent shall prepare for the consideration an approval of the Board a comprehensive plan for pupil records other than directory information which shall conform to the "Guidelines For Collection, Maintenance, and Dissemination Of Pupil Records" and the federal guidelines implementing the Family Educational Rights And Privacy Act (Public Law 93:380). <u>SECTION I, GENERAL POLICY STATEMENT</u></p> <p>Student records are an inherent part of a student's formal education in a public school setting. They are used by authorized personnel to collect, maintain, and disseminate pertinent information.</p> <p>Student records are, by nature, confidential and privileged, therefore, administrators, counselors, specialists, teachers, and members of the secretarial staff shall abide by the district's policy pertaining to the collection of data, maintenance of student records and the dissemination of information. The district's policy is in compliance with the Pennsylvania State Board of Education's regulations that were adopted on July 12, 1974.</p>
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SECTION II, DEFINITIONS

1. "Directory information" includes the following information relating to a student: the student's name, address, telephone number, date and place of birth, major field of study, participation in officially recognized activities and sports, weight and heights of members of athletic teams, dates of attendance, degrees and awards received, the most recent previous educational agency or institution attended by the student, and other similar information. (20 U.S.C. 1232 g (a) (5) (A))
2. "Disclosure" means permitting access or the release, transfer, or other communication of education records of the student of the personally identifiable information contained therein, orally or in writing, or by electronic means, or by any other means to any party.
3. "Educational records" means those records which: (1) are directly related to a student, and (2) are maintained by an educational agency or institution or by a party acting for the agency or institution. The term does not include:
 - a. Records of instructional, supervisory, and administrative personnel ancillary thereto which:
 - (1) Are in the sole possession of the maker thereof, and
 - (2) Are not accessible or revealed to any other individual except a substitute. For the purpose of this definition, a "substitute" means an individual who performs on a temporary basis the duties of the individual who made the record, and does not refer to an individual who permanently succeeds the maker of the record in his/her position.
 - b. Records of a law enforcement unit of an educational agency or institution which are:
 - (1) Maintained apart from the records described in this definition;
 - (2) Maintained solely for law enforcement purposes, and
 - (3) Not disclosed to individuals other than law enforcement officials of the same jurisdiction; PROVIDED, that education records maintained by the educational agency or institution are not disclosed to the personnel of the law enforcement unit.
 - c. Records relating to an individual who is employed by an educational

	<p>agency or institution which:</p> <ol style="list-style-type: none">(1) Are made and maintained in the normal course of business;(2) Relate exclusively to the individual in that individual's capacity as an employee, and(3) Are not available for use for any other purpose.(4) This paragraph does not apply to records relating to an individual in attendance at the agency or institution who is employed as a result of his/her status as a student. <p>d. Records relating to an eligible student which are:</p> <ol style="list-style-type: none">(1) Created or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his/her professional or paraprofessional capacity, or assisting in that capacity.(2) Created, maintained, or used only in connection with the provision of treatment to the student, and(3) Not disclosed to anyone other than individuals providing the treatment; PROVIDED, that the records can be personally reviewed by a physician or other appropriate professional of the student's choice. For the purpose of this definition, "treatment" does not include remedial educational activities or activities which are part of the program of instruction at the educational agency or institution. <p>e. Records of an educational agency or institution which contain only information relating to a person after that person was no longer a student at the educational agency or institution. An example would be information collected by an educational agency or institution pertaining to the accomplishments of its alumni. (20 U.S.C. 1232 g (a) (4))</p> <ol style="list-style-type: none">4. "Eligible student" means a student who has attained eighteen years of age, or is attending an institution of postsecondary education. (20 U.S.C. 1232 g (d))5. "Destruction" The physical destruction or permanent removal of personally identifying data from the educational records of a student so that the information in those records is no longer personally identifiable.6. "Financial Aid," as used in 99.31 (a) (4), means a payment of funds provided to
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	<p>an individual (or a payment in kind of tangible or intangible property to the individual) which is conditioned on the individual's attendance at an educational agency or institution. (20 U.S.C. 1232 g (b) (1) (D))</p> <p>7. "Institution of postsecondary education" means an institution which provides education to students beyond the secondary school level; "secondary school level" means the educational level (not beyond grade 12) at which secondary education is provided, as determined under State law. (20 U.S.C. 1232 g (d))</p> <p>8. "Parent" includes a parent, a guardian, or an individual acting as a parent of a student in the absence of a parent or guardian. An educational agency or institution may presume the parent has the authority to exercise the rights inherent in the Act unless the agency or institution has been provided with evidence that there is a State law or court order governing such matters as divorce, separation or custody, or a legally binding instrument.</p> <p>9. "Personally identifiable" means that the data or information includes (a) the name of a student, the student's parent, or other family member, (b) the address of the student, (c) a personal identifier, such as the student's social security number or student number, (d) a list of personal characteristics which would make the student's identity easily traceable, or (e) other information which would make the student's identity easily traceable.</p> <p>10. "Record" means any information or data recorded in any medium, including, but not limited to: handwriting, print, tapes, film, microfilm, and microfiche. (20 U.S.C. 1232 g)</p> <p>11. "Student" includes any individual with respect to whom an educational agency or institution maintains education records. The term does not include an individual who has not been in attendance at an educational agency or institution. A person who has applied for admission to, but has never been in attendance at a component unit of an institution of postsecondary education (such as the various colleges or schools which comprise a university), even if that individual is or has been in attendance at another component unit of that institution of postsecondary education, is not considered to be a student with respect to the component to which an application for admission has been made. (20 U.S.C. 1232 g (a) (5))</p> <p><u>SECTION III, QUASI-JUDICIAL REVIEW PANEL</u></p> <p>The district's administrative and guidance staff is responsible for:</p> <ol style="list-style-type: none">1. Determining the validity of Category "C" data;2. Reviewing challenges made by parents and rendering a decision as to:
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- a. The transference of Category "C" data to Category "B" data
- 3. Granting representative consent for the collection, maintenance, and dissemination of information in cases where parental consent cannot be obtained and there is reasonable doubt about the capacity of the student to understand the implications of a given situation and intervention is imperative.
- 4. Granting representative consent to persons, agencies, and/or institutions to conduct studies involving the school population under conditions of anonymity.

SECTION IV. COLLECTION OF DATA

- 1.0 No information shall be collected for the purpose of being made a part of a student's record without the prior informed consent of the child and his/her parents or representative consent having been granted by the school directors of the Center Area School District.
- 1.1 Representative consent is interpreted as consent having been granted for the collection of data that pertains to the recording of minimum personal data (Category A), group ability, aptitude and achievement testing, and reporting of skill and knowledge outcomes in the subject matter areas.
- 1.2 Individual consent is interpreted as consent having been granted by the child where s/he is reasonably competent to understand the nature and consequences of his/her decision; consent granted by his/her parents for the collection of information that pertains to Category "B" data personality testing and assessment, individual psychological evaluations (ability and verified clinical findings), family data which is beyond what is required for pupil identification (example: ethnic origin, income, occupational data, husband-wife relations, etc.), or any information not directly relevant for educational purposes. In all situations where individual consent is to be obtained, it is to be in writing.
 - 1.2.1 If reasonable doubt exists about the capacity of the student to understand the nature and consequences of his/her decision, parental permission must be obtained first.
 - 1.2.2 In the event there is disagreement between the child and parent, the parent's consent shall be binding in all cases, except when the student meets the criteria of the definition of "eligible student."
- 1.3 Parents and/or eligible students are to be made aware of the collection of data identified as being between category "A" and "B" data; for example, habit/skills tests, vocational interest inventories, or tests that are not a part of

	<p>the district's standardized testing program but relevant to the educational needs of the student.</p> <p>1.4 No statement of consent, individual or representative, shall be binding unless freely given after the parents and/or eligible students have been fully informed as to the methods by which the data will be collected, recorded, maintained, length of time retained, to whom it will be made available and under what conditions.</p> <p>1.5 Parents and/or eligible students are to be informed annually as to the purpose and character of data that is being collected by virtue of representative consent and of the location and availability of this policy. The school directors, upon notification in writing, will grant parents the right to contest the necessity or desirability of particular data collection processes or proposed use of such data. The decision of the school directors is subject to higher authority or judicial review.</p> <p>1.5.1 The decision rendered by a higher authority or by judicial review is binding on all students and parents, whether or not they may have individually consented to the collection.</p> <p>1.6 In situations where informed consent cannot be met, for example, interviews by school personnel, the following procedures will be followed:</p> <p>1.6.1 Voluntary participation on the part of the student with his/her complete awareness of the implication of the situation and the data that is likely to be obtained.</p> <p>1.6.2 Where reasonable doubt exists about the student's ability to understand and parental permission cannot be obtained, further steps are to be initiated only if the counselor or principal:</p> <ul style="list-style-type: none">a. Is entirely convinced that full attention has been given to the privacy of interests involved and that intervention is imperativeb. Both the student and his/her parents have been fully informed to the extent possible. <p>1.7 The collection of data for research studies, under conditions of anonymity, either by school personnel or by appropriate institutions and/or agencies is permissible provided that:</p> <ul style="list-style-type: none">a. A written request to conduct the study has been submitted to and approved by the district's Superintendent;
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- b. The request, upon the Superintendent's approval, is submitted to the district's administrative and guidance staff for review;
- c. The district's administrative and guidance staffs have granted representative consent after having reviewed the intent and component parts of the study;
- d. Parents and eligible students are notified of the pending study and participation is on a voluntary basis.

1.7.1 In the event that the district's administrative and guidance staffs conclude that the collection of the data is a potential invasion of privacy, even though the study is to be done under conditions of anonymity, the person or persons conducting the study must obtain informed individual consent.

SECTION V, CLASSIFICATION AND MAINTENANCE OF DATA

2.0 The collection and use of varied kinds of student data requires the adoption of the following district-wide classification and maintenance system which is in compliance with state regulations.

2.1 Category "A" Data: Category "A" data pertains to the use of forms and official administrative records that are used to record the minimum personal data necessary for the operation of the educational system. For example: identifying data (including names and addresses of parents or guardian), birth date, attendance, group ability, aptitude, and achievement testing, academic work completed, and grades received.

2.1.1 Attendance Records: The attendance record (DEBE Form 482) is a form of administrative recordkeeping used to satisfy state attendance laws. DEBE Forms 482 are maintained by the district's central office for each school year. Copies of the DEBE Forms 482 are submitted to the state and intermediate unit for each school year.

- a. The DEBE Forms 482 are to be maintained until auditing has been completed and for a period of no less than six years.

2.1.2 Permanent Records: The permanent record is a form of administrative record keeping required to transmit educational information to appropriate individuals, agencies, institutions, and/or organizations.

- a. Permanent records are initiated by the principal's office at the elementary and middle school level and by the guidance department at the secondary level.

	<ul style="list-style-type: none">b. After having recorded Category "A" data onto a student's permanent record, the enrollment forms and/or records received from sending schools are to be maintained in the student's cumulative folder for a period of 10 months.c. The student's elementary permanent record is to be maintained and made a part of the secondary's permanent record. Both records are housed in the high school's locked storage areas, and access to these records shall be in accordance with Sections 4.0 6.0 of the district's policy.d. The permanent record is to be maintained for a period of not less than 100 years. <p>2.2 <u>Category "B" Data</u>: Category "B" data constitutes verified information which is used by school personnel to help the student during this period of enrollment and to protect others. For example: personality testing and assessment, interest inventory results, individual psychological evaluations (ability and verified clinical findings), family background information, guidance and health services reports, psychological referrals, systematically gathered teacher or counselor ratings and observations, verified reports of serious and recurrent behavioral patterns, and various educational data forms used by counselors. Parents and/or eligible students will be informed annually in writing (at the beginning of the school year or upon the student's entrance in school) of "B" type data and of their right to access according to the conditions outlined in 4.9 and 4.9.1.</p> <p>2.2.1 <u>Cumulative Records</u>: The cumulative record is an "in-house" record used and maintained by counselors to assist the individual student and to evaluate his/her educational development.</p> <ul style="list-style-type: none">a. During periods of transition from elementary to middle school to junior high school, to high school, counselors are to eliminate unnecessary data.b. At the close of each school year, cumulative records of graduates are to be transferred to the district's storage and maintained for a period of not less than five years. <p>2.2.2 <u>Psychological Reports</u>: Category "B" psychological reports are used by the professional staff to provide optimal services to the individual student.</p> <ul style="list-style-type: none">a. Category "B" psychological reports are not to be made a part of a student's cumulative or permanent record. They are to be maintained in a separate file under tight security and destroyed when their educational relevance has ended.
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	<p>b. The psychological referral form is to be destroyed upon receipt of a Category "B" psychological report or after having verbally communicated with the school psychologist in regard to Category "C" type reports.</p> <p>2.2.3 <u>Discipline Reports</u>: Discipline reports are used by teachers, assistant principals, and principals to record verified negative student behavior, the student's explanation of the situation, and action taken by the administration. Behavioral reports, whether minor infractions or of a more serious nature, are to be maintained by the principal and/or assistant principal during the student's period of enrollment or final disposition by Board action.</p> <p>2.2.4 <u>Medical Records</u>: In compliance with Article XIV, Sections 1402, 1408, 1409, and 1421 of the school code, medical records are a form of record keeping used to record pertinent health data. Medical records consist of medical and dental forms, questionnaires, and surveys, which are deemed necessary by the state's advisory health board.</p> <p>a. The district's nurses are responsible for the collection, maintenance, and dissemination of medical information.</p> <p>b. Health records of transferring students are to be forwarded to receiving schools upon written notification of enrollment. Records of students whose enrollment has been terminated are to be maintained for a period of not less than two years.</p> <p>2.3 <u>Category "C" Data</u>: Category "C" data pertains to the collection of unverified data that has an immediate or potential use. For example: legal or unverified clinical findings and unevaluated reports of administrators, counselors, teachers, and others.</p> <p>2.3.1 Category "C" data is not to be made a part of the student's permanent or cumulative record. It is to be maintained and reviewed annually by the individual having initiated the collection of information. If the data is of no further immediate use, it is to be destroyed or transferred to Category "B." The transfer of "C" data to Category "B" may be made only if the following conditions are met:</p> <p>a. The continuing usefulness of the data is clearly indicated.</p> <p>b. The data's validity has been verified and parents have been notified of the transfer and given an explanation as to the motive of the information.</p>
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2.3.2 Formal procedures for validating information and protecting the interests of students and parents will be followed in accordance with Subsection 3.3 of this policy.

2.3.3 If unevaluated data is held for more than a year, the existence of this data is to be discussed with the parent and/or eligible student the reason for their maintenance is to be explained fully. Eligible parties have the right to challenge the decision to maintain such data through procedures outlined in Subsection 3.3.

2.4 Confidential and Personal Files: Confidential and personal files may be maintained by professionals to counsel and to render services to students. For example, notes, transcripts, or interviews, and clinical diagnosis.

a. Confidential and personal files are considered as being the personal property of the professional.

(1) They are to be maintained in the manner prescribed by Act 287 of the state legislature, district policy, professional ethics, and by any special agreements made between the professional and individual parents and/or students.

SECTION VI, SECURITY

3.0 The district's administrative and guidance staffs are responsible for the maintenance and security of student records. They are also responsible for conducting in-service programs related to the district's policy.

3.1 Designated personnel responsible for the collection, maintenance, security, and dissemination of information throughout the district's various school buildings are as follows:

<u>ELEMENTARY SCHOOLS</u>			
Record/Report	Location Of Records	Responsibility	Clerical Functions
a. Attendance Records	Principal's Office Homeroom	Principals	Sec. Staff Inst. Staff
b. Permanent Records	Principal's Office Locked Filing Cabinet	Principals Counselors	Counselors Sec. Staff Inst. Staff
c. Cumulative Records	Principal's Office Locked Filing Cabinet	Principals Counselors	Counselors Sec. Staff Inst. Staff
d. Health Records	Nurse's Office	Nurses	Nurses Sec. Staff
e. Discipline Reports	Principal's Office	Principals	Sec. Staff
f. Psychological Reports	Principal's Office Locked Filing Cabinet	Principals Counselors	Counselors Sec. Staff

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<u>MIDDLE AND SENIOR HIGH SCHOOL LEVELS</u>			
Record/Report	Location Of Records	Responsibility	Clerical Functions
a. Attendance Records	Principal's Office Homeroom	Principals Counselors	Sec. Staff
b. Permanent Records	Principal's Office Locked Filing Cabinet	Principals Counselors	Counselors Sec. Staff
c. Cumulative Records	Locked storage rooms Senior H.S. and Principal's Office J.H.S.	Principals Counselors	Sec. Staff Inst. Staff
d. Health Records	Nurse's Office	Nurses	Nurses Sec. Staff
e. Discipline Reports	Principal's Asst. Principal's Office	Principal Asst. Principal	Sec. Staff
f. Psychological Reports	Principal's Office Locked Filing Cabinet	Principals Counselors	Counselors Sec. Staff
<u>DISTRICT LEVEL</u>			
Record/Report	Location Of Records	Responsibility	Clerical Functions
a. Attendance Records	District Office	Superintendent Central Office Staff	Central Office Sec. Staff
<p>3.2 Records are to be kept under lock and key at all times under the supervision of designated professionals.</p> <p>3.3 Formal procedures for the challenging of any information contained in Category "A" or "B" by the parent or eligible student are as follow:</p> <p>3.3.1 The parent and/or eligible student must submit written notification to the Superintendent of Schools.</p> <p style="padding-left: 40px;">a. Upon receipt of written notification, the Superintendent or his/her designated representative will arrange for a conference with the parents and/or eligible student to resolve the conflict. The conference is to be scheduled within 10 school days of the written notification of the eligible party.</p> <p style="padding-left: 40px;">b. If the conflict has not been resolved as a result of the initial conference the eligible party's challenge is to be reviewed by the district's administrative and guidance staffs within a period not to exceed 30 school days from the receipt of the eligible party's written notification.</p> <p>3.3.2 Eligible parties are to be given written notification by the Superintendent or his/her designated representative as to the date, time, and location of the</p>			

hearing. Reasonable time (at least 30 days) is to be granted to eligible parties to prepare for the proceedings. In addition, eligible parties are to be granted rights to counsel, to present evidence, and to cross-examine witnesses.

The hearing may be conducted by any party, including an official of the educational agency or institution, who does not have a direct interest in the outcome of the hearing.

The educational agency or institution shall make its decision in writing within a reasonable period of time after the conclusion of the hearing; and

The decision of the agency or institution shall be based solely upon the evidence presented at the hearing and shall include a summary of the evidence and the reasons for the decision. (20 U.S.C. 1232 g (a) (2))

If, as a result of the hearing, the educational agency or institution decides that the information is inaccurate, misleading, or otherwise in violation of the privacy of other rights of students, it shall amend the education records of the student accordingly and so inform the parent of the student or the eligible student in writing.

If, as a result of the hearing, the educational agency or institution decides that the information is not inaccurate, misleading, or otherwise in violation of the privacy or other rights of students, it shall inform the parent or eligible student of the right to place in the education records of the student a statement commenting upon the information in the education records and/or setting forth any reason for disagreeing with the decision of the agency or institution.

3.3.3 Complaints regarding violations of rights accorded parents and eligible students shall be submitted to the following address:

The Family Educational Rights and Privacy Act Office
Department of Health, Education and Welfare
330 Independence Avenue SW
Washington, D.C. 20201

SECTION VII, DISSEMINATION OF INFORMATION

4.0 All information pertaining to pupils and their families shall be collected and maintained in accordance with the district's policy.

4.1 Designated district personnel (Subsection 3.1) are permitted to release Category "A" and "B" data without the consent of parents or eligible students to:

	<p>4.1.1 Other school officials and professional employees within the district who have a legitimate educational interest. Criteria for determining legitimate educational interest shall be:</p> <ul style="list-style-type: none">a. Professional Personnel directly responsible for providing instruction to studentsb. Personnel directly responsible for providing direct support service to studentsc. Personnel responsible for health and safety of students while in attendance at schoold. Clerical Staff in direct responsibility to their dutiese. Administrative Personnel <p>4.1.2 The State Superintendent and his/her officers or subordinates, provided that the intended use of the data is consistent with the Superintendent's statutory powers and responsibilities.</p> <p style="padding-left: 40px;">The Comptroller General of the United States</p> <p style="padding-left: 40px;">The Secretary of Health, Education and Welfare</p> <p style="padding-left: 40px;">The Director of the National Institute for Education</p> <p style="padding-left: 40px;">The Assistant Secretary for Education</p> <p style="padding-left: 40px;">The Commissioner of Education</p> <p>4.1.3 Officials of other primary or secondary school systems or institutions of higher learning including financial aid officers in which the student intends to enroll under the condition that the parents and/or eligible students be notified of the transfer and receive a copy of the record if desired.</p> <p>4.1.4 Appropriate authorities in an emergency situation in which the health, safety, or welfare of the student is in jeopardy.</p> <p>4.1.5 Parents and/or eligible students have the right to challenge the validity of the data sent to receiving schools in accordance with the procedures adopted by the district's policy.</p> <p>4.2 School personnel are not to disseminate information contained in student records to anyone other than those listed in 4.1.1 4.1.4. Exceptions are:</p>
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	<p>4.2.1 Authorization granted by written consent signed and dated from the parents and/or eligible student requesting what records are to be released and to whom and the purpose of the disclosure. Parents and/or eligible students desiring to have a copy of the records that were released by the school must submit their request in writing to the responsible professional who released the records.</p> <p>4.2.2 Compliance with a judicial order or orders from administrative agencies which have the power of subpoena. Parents and/or eligible students are to be notified of the district's compliance with such orders.</p> <p>4.3 The below-listed distinctions are to be made in regard to parental and/or eligible student consent forms required for the release of student information:</p> <p>4.3.1 <u>Category "A" Data</u> (2.1) routine and nonspecific as to the information being released.</p> <p>4.3.2 <u>Category "B" Data</u> (2.2) specific in terms of what information is to be released.</p> <p>4.4 <u>Category "C" Data</u> or information obtained from a non-school agency are not to be released under any condition with the exception of date of birth and as specified in 4.2.2.</p> <p>4.5 All psychological evaluations are to be interpreted by qualified psychologists having administered the tests (for ex.; Intermediate Unit Psychologists).</p> <p>4.6 Each matter of consent request for the release of Category "B" data must be handled on an individual basis. Blanket permissions for the release of this data within an extended period of time are not to be solicited as they do not provide an opportunity for informed consent.</p> <p>4.7 The school district will comply with parental or eligible student requests for the release of Category "A" or "B" data, subject to the qualifications set forth in 4.8 regarding the safeguards of the student's rights when s/he reaches legal age.</p> <p>4.8 The below exceptions are to be made to the principle of parental consent with respect to the problem of an eligible student's age and his/her legal rights:</p> <p>4.8.1 A student's consent rather than a parental consent must be obtained when s/he reaches the age of eighteen and is no longer attending high school or is married (whether age eighteen or not).</p> <p>4.8.2 This includes the right to deny parental access to the eligible student's records.</p> <p>4.9 Eligible students, parents, or guardians, or their legal representatives are</p>
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entitled to have access to Category "A" data. In addition, parents are entitled to have access to Category "B" data. Non-eligible students may have access to Category "B" data with parental permission. Requests for access to records should be made in writing to the Building Principal.

4.9.1 The above-stated rights of parents to the access of their child's records is subject to the principle of student age and consent. (4.8).

4.9.2 Such requests shall be honored within 30 days of the request.

4.9.3 The school reserves the right to have a qualified professional employe present to explain and interpret the student's records.

4.9.4 Copies of the records will be provided to the parent or eligible student upon request. These copies will be unsigned and will be considered unofficial school records.

5.0 The school district reserves the right to provide anonymous data from its records for outside research purposes without individual consent in accordance with 1.7 of this policy.

6.0 Directory information may be disclosed for purposes beneficial to the student or the school district only with the approval of the district Superintendent or his/her designee.

6.1 The parent or eligible student has the right to refuse the disclosure of any or all types of directory information by giving the school written notice within twenty (20) days of publication of the notice. Parents shall be given public notice relative to this right at the beginning of the school year.

7.0 The principle of informed consent shall apply in all cases except in those involving school responsibilities under existing child abuse or neglect statutes.

SECTION VIII, RECORD OF REQUESTS AND DISCLOSURES REQUIRED TO BE MAINTAINED

1.0 An educational agency or institution shall for each request for and each disclosure of personally identifiable information from the education records of a student, maintain a record kept with education records of the student which indicates:

1.1 The parties who have requested or obtained personally identifiable information from the education records of the student, and

1.2 The legitimate interests these parties had in requesting or obtaining the

	<p>information.</p> <p>2.0 Paragraph (1.0) of this section does not apply:</p> <p>2.1 to requests by or disclosure to a parent of a student or an eligible student.</p> <p>2.2 to requests by or disclosures to school officials under 4.1.1.</p> <p>2.3 If there is written consent of a parent of a student or an eligible student, or</p> <p>2.4 to requests for or disclosure of directory information.</p> <p>3.0 The record of requests and disclosures may be inspected;</p> <p>3.1 By the parent of the student or the eligible student</p> <p>3.2 By the school official and his/her assistants who are responsible for the custody of the records, and</p> <p>3.3 For the purpose of auditing the record keeping procedures of the educational agency or institution by the parties authorized in, and under the conditions set forth in 4.1.1 and 4.1.2. (20 U.S.C. 1232 g (b) (4) (A))</p>
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