**Student Records**

Student records shall be managed by the district records custodian in the following manner:

**Type of Records**

Student records shall be divided into two categories: the cumulative folder and supplementary records.

The cumulative folder may contain all information about a student which is collected and maintained on a routine basis, such as identifying information (name, birth date, sex, year in school, address, telephone number, parent's name, ethnic classification, emergency information [parent's place of employment, family doctor, babysitter, siblings]); attendance records including date of entry and withdrawal; grades and other student progress reports; results of tests of school achievement, aptitude, interests, hearing and vision; health and immunization status reports; records of school accomplishments and participation in school activities; verified reports of misconduct, including a record of disciplinary action taken; and such other information as shall enable staff to counsel with students and plan appropriate activities. Identifying information may be limited if the student is a participant in the state Address Confidentiality Program.

The permanent record consists of the portion of the cumulative record which constitutes the transcripts for high school and middle or junior high school or other historic records showing courses completed and grades earned, elementary enrollment history and grade progression, and permanent report cards.

Supplementary records about a student may be collected and maintained in connection with special school concerns about the student, such as confidential health information or reports connected with assessment and placement of a student who is referred for special education services, reports from nonschool persons and organizations such as physicians, psychologists and clinics, except for general screening purposes; reports pertaining to specific problems associated with the student; and current reports of psychological tests and progress reports related to a student's disabling condition. All such reports included in records shall be dated and signed.

For the purpose of this procedure, working notes of staff are defined as those records about students which are maintained in the sole possession of the writer and are not accessible or revealed to any other person except a substitute for that staff member. Working notes are not considered student records within the purview of this procedure.

**Accessibility of Student Records**

Information contained in the cumulative folder and/or supplementary records shall be provided to persons and agencies as follows:
Parents

A request to review records may be initiated by the parent or a staff member. The review shall occur within a reasonable period of time after a request is received. In no case shall the review occur later than 45 days after the request is made. Inspection and review shall be conducted during normal working hours, unless the custodian (teacher, counselor, nurse, psychologist, principal) consents to other arrangements. Although records must remain within district control, they may be copied or reproduced by or for the parent or eligible student at their own expense.

The parent shall be provided analysis and interpretation by qualified staff of all information in the cumulative folder and supplementary records.

The Student

The adult student may inspect his/her cumulative folder and supplementary records. The review shall occur within a reasonable period of time after a request is received. In no case shall the review occur later than 45 days after the request is made. Inspection and review shall be conducted during normal working hours, unless the custodian (teacher, counselor, nurse, psychologist, principal) consents to other arrangements. Upon graduation from high school, a student may request to receive a final transcript in addition to the diploma.

Information from the cumulative folder shall be interpreted to the student upon request. Information contained in supplementary records shall be interpreted to the student upon his/her request and with the consent of the parent.

The right of access granted the parent or adult student includes the right to be provided a list of the types of student-related education records maintained by the school and the district. The parent and adult student shall have the right to inspect or to be informed of the content of any record containing personally identifiable information regarding more than one student, provided that the right to access shall apply only to that portion of the record or document which relates to the student.

School Officials

School officials who have a legitimate educational interest in a student shall have access to the cumulative folder and any supplementary records. School officials have a legitimate educational interest in a student record if the officials need to review the record in order to fulfill their employment or other responsibilities concerning the District or the student.

A school official is 1) a person employed by the District as an administrator, supervisor, instructor, or other support staff, including, but not limited to, health or medical professional, or school law enforcement unit personnel, 2) a school board member, 3) a contractor engaged by the District to perform a special task which may include, but is not limited to, instruction, audits,
legal services, consultations, or therapy, 4) a parent or student serving on an official committee, such as a disciplinary or grievance committee, and 5) other staff assisting with these duties.

**Other Districts**

Other districts shall be provided with records upon official request from the enrolling district, unless the student has an outstanding fee or fine. In those instances the enrolling school shall be provided with information on the student's academic progress, special placement, immunization history and discipline within two school days, but the official transcript shall be withheld until the fee or fine is discharged. The enrolling school district shall be notified that the transcript is being withheld due to an outstanding fee or fine. At the time of transfer of the records, the parent or adult student may receive a copy of the records at his/her expense if requested and shall have an opportunity to challenge the contents of the records. Parents shall be advised through an annual written notice that student records shall be released to another school where the student has enrolled or intends to enroll.

**Other Persons and Organizations**

Information contained in the cumulative folder and supplementary records of a student shall be released to persons and organizations other than the student, parent, staff and other districts only with the written consent of the parent or adult student, unless authorized by law. A partial list of authorized disclosures is set forth below; however, other disclosures may be allowed under certain circumstances. Telephone requests for information about students shall not be honored unless the identity of the caller is known and the caller is authorized to receive the information under provisions of these procedures.

A. Directory information may be released publicly without consent upon the condition that the parent or adult student be notified annually of the school's intention to release such information and be provided the opportunity to indicate that such information is not to be released without prior consent. Directory information is designated only for secondary students and does not apply to elementary students. Such information shall not be released for commercial reasons. Directory information is defined as the student's name, address, date and place of birth, photographs (including yearbooks), digital/video recordings, post-high school career plans, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, types of awards and degrees received, and the most recent school attended.

B. The names, addresses and telephone numbers of students in grades nine through twelve will be released upon request to military recruiters and institutions of higher education unless the parent or adult student specifically opts out of having their information released. In addition, the district will release any student’s current school, address and telephone number to the police/sheriff’s department and Child Protective Services. The actual residential addresses of participants in the state Address Confidentiality Program will not be available for release as directory information. A parent or adult student may
request that directory information not be released without prior written parental or adult student consent.

C. Information may be released to authorized representatives of the comptroller general of the United States, the commissioner of education, and/or an administrative head of an education agency or state education authorities in connection with the audit and evaluation of federally supported education programs or in connection with the enforcement of the federal legal requirements for such programs.

D. Information may be released to state and local officials to whom such information is specifically allowed to be reported or disclosed pursuant to Washington state statute (examples: reporting child abuse or referrals to juvenile court for truancy).

E. Information may be released to organizations conducting studies for educational agencies for the purpose of developing, validating or administering predictive tests or improving instruction, if such studies are conducted in such a manner as will not permit the personal identification of students and their parents by persons other than the representatives of such organizations and if such information shall be destroyed when no longer needed for the purpose for which it has been gathered.

F. Information may be released in compliance with a judicial order or lawfully issued subpoena, upon condition that a reasonable effort was made to notify the parent or adult student in advance of such compliance.

G. Information may be released to appropriate persons and agencies in connection with an emergency to protect the health or safety of the student or other persons.

H. A high school student may grant authority to the district permitting prospective employers to review the student's transcript

**Record of Release**

Except as provided below, when information from a student's record is released to any other person or organization, a record of such release shall be maintained as part of the specific record involved. The record of release shall be placed in the student’s cumulative folder and shall include the date of access, name of the party granted access and the legitimate educational interest of the party granted access.

A record of release is not required for directory information or when the release is to the parent, adult student, persons with written consent from the parent or adult student, other school officials within the district who have legitimate educational interest in the record, or when the record is released pursuant to a subpoena for law enforcement purposes or a federal grand jury and a court or the issuing agency has ordered that the existence or contents of the subpoena not be disclosed.
Educational Privacy Rights

Parents and adult students shall be notified annually of their right to inspect and review the records of their children and their other rights under the Family Education Rights and Privacy Act through an annual written notice to parents in the following form:

The Family Educational Rights and Privacy Act (FERPA) affords parents and students over 18 years of age (eligible students) certain rights with respect to the student's education records. They are:

1) The right to inspect and review the student's education records within 45 days of the day the district receives a request for access.

Parents or eligible students should submit to the school principal (or appropriate school official) a written request that identifies the record(s) they wish to inspect. The principal will make arrangements for access and notify the parent or eligible student of the time and place where the records may be inspected.

2) The right to request the amendment of education records that the parent or eligible student believe are inaccurate or misleading.

Parents and eligible students may ask the district to amend a record that they believe is inaccurate or misleading. They should write the school principal, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading.

If the district decides not to amend the record as requested by the parent or eligible student, the district will notify the parent or eligible student of the decision and advise him/her of the right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the parent or eligible student when notified of the right to a hearing.

3) The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception which permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by the district as an administrator, supervisor, instructor, or support staff member (including, but not limited to, health or medical staff and law enforcement unit personnel); a person serving on the school board; a person or company with whom the district has contracted
to perform a special task (including, but not limited to, an attorney, auditor, medical consultant, or therapist); or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional/employment responsibility.

Upon request, the district discloses educational records without consent to officials of another school district in which a student seeks or intends to enroll.

4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the district to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

   Family Policy Compliance Office
   U.S. Department of Education
   600 Independence Avenue S.W.
   Washington, D.C.  20202-4605

Confidential Health Records

Confidential health records should be stored in a secure area accessible only to the school health care provider, unless an appropriately executed release under Chapter 70.02 RCW has been obtained. Such records are also covered by the Family Education Rights and Privacy Act, but state law may provide stricter protection. There is a higher standard of confidentiality for records pertaining to HIV, sexually transmitted diseases, drug or alcohol treatment, mental health treatment, family planning or abortion. Only students may authorize release of records concerning family planning or abortion, students thirteen years or older control access to drug, alcohol or mental health treatment records and students fourteen years or older may deny or authorize access to records regarding HIV or sexually transmitted diseases. The releases for information regarding sexually transmitted diseases, HIV and drug or alcohol treatments are more restrictive than ordinary medical releases.

Challenges and Hearings

At the time of inspection and review the parent or adult student granted access to records may challenge of any record directly related to the student on the basis that it is inaccurate, misleading or violates the privacy or other rights of the student and may demand correction or deletion. The parent or adult student seeking such an amendment should submit a written request to the principal or other custodian of the record, specifying clearly which portion should be changed and explaining why it is erroneous or misleading. The principal or other custodian may grant the request.
If the demanded correction or deletion is denied by the principal or custodian, the parent or adult student may request hearing before the principal’s or custodian’s supervisor or designee, which hearing shall be held within 10 school days of the receipt of such request. During the hearing the supervisor or his/her designee shall review the facts as presented by the parent or adult student and the principal or custodian and decide whether or not to order the demanded correction or deletion. The supervisor shall send his/her written decision to the parent or adult student within 10 school days of the hearing. Parents or adult students challenging the appropriateness and accuracy of student records may insert a written explanation of their objections in such records.

**Maintenance of Student Records**

The student's principal shall be the custodian of the cumulative folder. The principal or superintendent’s designee shall be the custodian of the supplementary records.

Custodians shall:

A. Maintain only those records authorized by these procedures;
B. Safeguard student records from unauthorized use and disposition;
C. Maintain access records;
D. Honor access requests for parent or adult student;
E. Delete or correct records upon approval of the senior custodian or upon order of the superintendent or designee; and
F. Follow the records retention schedule and procedures established by the senior custodian.

Senior custodians may assume the duties of custodians and shall:

G. Request student records from other schools;
H. Maintain security of student records;
I. Transfer, destroy and expunge records as permitted;
J. Supervise activities of their custodians;
K. Conduct informal hearings and grant or deny approval of corrections or deletions requested by parents or adult students;
L. Establish records review schedules and procedures for their respective schools or departments in accordance with procedures governing records disposition;
M. Upon transfer of the student to the next level (elementary to middle school, middle school to high school) or upon graduation or transfer outside the district, remove for retention, preservation or destruction in accordance with applicable disposition procedures any records no longer pertinent to educational program placement.

The district records custodian shall provide overall supervision of student records management and control and shall enforce the student records policy and the administrative procedures.

Disposition of Student Records

The permanent student record shall serve as the record of the student's school history and academic achievement. Permanent records filed in the student's cumulative folder are to be extracted and retained before disposition of the folder.

When a student transfers to another school in the district, all records, including the permanent student record, shall be transmitted to the other school. When a student transfers to a school outside of the district, the senior custodian shall purge the cumulative folder of all nonofficial, extraneous information. A copy of all records will be sent to the requesting school, unless the student has an outstanding fee or fine. In those instances the enrolling school shall be provided with information regarding the student's academic, special placement, immunization history and discipline records within two school days, and the records shall be sent as soon as possible. The official transcript shall be withheld until the fee or fine is discharged. The enrolling school district shall be notified that the transcript is being withheld due to an outstanding fee or fine.

Cumulative folders of students shall be retained for six years after graduation from high school or for six years after discontinuance of high school enrollment. Contents of a student's supplementary records shall be maintained for six years or as otherwise provided in the District’s records retention schedule. In all cases, the portion of the cumulative file that is the student's permanent record shall be retained in perpetuity by the district.

Large Scale Destruction of Student Records

After exercising care in accordance with that contained in the previous section (Disposition of Student Records), the senior custodian shall bundle all records and send them to the district office. Each bundle shall be plainly marked: "Student Records--for Destruction," dated and signed by the senior custodian. A summary sheet shall be completed and retained in the office. The sheet shall indicate: "As of this date, I have determined that the following records may be destroyed in accordance with district and state requirements and have submitted them for destruction." The summary sheet shall be dated and signed by the senior custodian.

Approved 6/13/02
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