



AP 5040 Education Records, Directory Information, and Privacy

References:

The Family Educational Rights and Privacy Act (FERPA);
20 U.S. Code Section 1232g;
34 Code of Federal Regulations Part 99;
NWCCU 2020 Standard 2.C.4
OAR 589-004-0100 to 589-004-0750

Rogue Community College will maintain a cumulative record of enrollment, scholarship, and educational progress for each student.

Education records are those records that relate directly to a student and maintained by Rogue Community College or by someone acting for Rogue Community College. Education records are not:

- A personal memory aid kept in the sole possession of the person who created it and that are not accessible or revealed to anyone, except a temporary substitute for the person who made the record.
- Records maintained by a law enforcement unit of the educational agency or institution.
 - Records of a law enforcement unit means those records, files, documents, and other materials that are created by a law enforcement unit; created for a law enforcement unit; and maintained by the law enforcement unit. Records of a law enforcement unit do not include:
 - Records created by a law enforcement unit and for a law enforcement purpose but that are maintained by a component of the Rogue Community College other than the law enforcement unit; or
 - Records created and maintained by a law enforcement unit exclusively for a non-law enforcement purpose, such as a disciplinary action or proceeding conducted by the educational agency or institution.
- Records relating to an employee, that are made and maintained in the normal course of business; relate exclusively to the individual in that individual's capacity as an employee; and are not available for use for any other purpose. However, student employee records remain education records.
- Medical or treatment records of a student who is 18 years of age or older, or is attending Rogue Community College, that are:



- Made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his/ her professional capacity or assisting in a paraprofessional capacity;
 - Made, maintained, or used only in connection with treatment of the student; and
 - Disclosed only to individuals providing the treatment. For the purpose of this definition, “treatment” does not include remedial educational activities or activities that are part of the program of instruction at the agency or institution.
- Records created or received by Rogue Community College after an individual left Rogue Community College and not directly related to the individual's attendance as a student.
 - Peer-graded paper grades before the instructor collects and records them.

Release of Education Records

No instructor, official, employee, or Board of Education member shall authorize access to student records to any person except under the following circumstances. All requests for Education Records shall be reviewed, approved and processed by the Registrar or designee.

- Education records shall be released pursuant to a student's written consent. *Students may release their academic records to their parents, a prospective employer, insurance companies, etc., by providing written consent. The notice of written consent must include the following information:*
 - *It must specify the records to be released (transcripts, etc.)*
 - *State the purpose of the disclosure*
 - *Identify the party or class of parties to whom disclosure may be made*
 - *Include a shared password to authenticate the identity of the party or class of parties, and*
 - *Be signed and dated by the student*
- “Directory information” *It is RCC’s procedure that directory information may be released only to:*
 - student organizations
 - other educational institutions
 - local, state, and federal agencies in the performance of their functions.

This information may not be further released by any of these agencies. The Registrar must approve exceptions to this policy. Rogue Community College does not release directory information for the purpose of soliciting students.

As a service to students and to accommodate other written requests for directory information by individuals, Enrollment Services will forward written messages to a



student's current home address. This service does not include notices or information to groups of students.

Students May Request Nondisclosure of Directory Information: Directory information may be released upon written request unless a student files a Directory Exemption Form. The directory exemption will remain in effect until rescinded by the student. Exemption status keeps an individual's name from appearing in print for press releases or for commencement or other awards and recognition by the college. By completing this form, students restrict their student information to institutional use only. Directory information will not be released to anyone, for any reason (including personal emergencies), at any time. For anyone calling for a student who has a directory exemption on record, the following statement will be spoken: "I have no information on this individual." To conduct college business, students who have a directory exemption must either do so in-person or through their email address of record, and provide their directory exemption password.

- Education records shall be released pursuant to a judicial order or –a lawfully issued subpoena, provided that Rogue Community College makes a reasonable attempt to notify the student in advance of compliance. Judicial orders and lawfully issued subpoenas must be submitted to the Enrollment Services Department. NOTE: Rogue Community College is not required to notify the student if a federal grand jury subpoena, or any other subpoena issued for a law enforcement purpose, orders the institution not to disclose the existence or contents of the subpoena. Judicial orders and lawfully issued subpoenas must be submitted to the Enrollment Services Department. In most instances, a lawfully issued subpoena is issued and signed by an attorney on behalf of a court in which the attorney is authorized to practice law.
- Education records shall be released pursuant to a federal judicial order that has been issued regarding an investigation or prosecution of an offense concerning an investigation or prosecution of terrorism. Federal judicial orders must be submitted to the Enrollment Services Department.
- Education records may be released to officials and employees of Rogue Community College only when they have a legitimate educational interest to inspect the record. School officials who act in the student's educational interest, including faculty, administration, student employees, clerical and professional employees, and other persons who manage student records information. Any school official who needs information about a student in the course of performing instructional, supervisory, advisory, or administrative duties for Rogue Community College has a legitimate educational interest.
- Education records may be released to authorized representatives of the Comptroller General of the United States, the Attorney General of the United States, the Secretary of Education, or State and local educational authorities, where that information is



necessary to audit or evaluate a state or federally supported educational program or pursuant to federal or state law. Exceptions are that when the collection of personally identifiable information is specifically authorized by federal law, any data collected by those officials shall be protected in a manner that will not permit the personal identification of students or their parents by other than those officials, and any personally identifiable data shall be destroyed when no longer needed for that audit, evaluation, and enforcement of federal legal requirements. Requests must be submitted to the Enrollment Services Department

- Education records may be released to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled, so long as the disclosure is for purposes related to the student's enrollment or transfer.
- Education records may be released to agencies or organizations in connection with a student's application for, or receipt of, financial aid, provided that information permitting the personal identification of those students may be disclosed only as may be necessary for those purposes as to financial aid, to determine the amount of the financial aid, or conditions that will be imposed regarding financial aid, or to enforce the terms or conditions of financial aid.
- Education records may be released to organizations conducting studies for, or on behalf of, accrediting organizations, educational agencies or institutions for the purpose of developing, validating, or administering predictive tests, administering financial aid programs, and improving instruction, if those studies are conducted in such a manner as will not permit the personal identification of students or their parents by persons other than representatives of those organizations and the information will be destroyed when no longer needed for the purpose for which it is conducted.
- Education records may be released to appropriate persons in connection with an emergency if the knowledge of that information is necessary to protect the health or safety of a student or other persons, subject to applicable federal or state law.
- The following information shall be released to the federal military for the purposes of federal military recruitment: student names, addresses, telephone listings, dates, and places of birth, levels of education, major(s), degree(s) received, prior military experience, and/or the most recent previous educational institutions enrolled in by the students.

Charge for Transcripts of Student Records

A student/former student may order copies of the transcript of their record. The request form and transcript fee schedule is available at <https://web.roguecc.edu/enrollment-services/rcc-transcripts>.



Use of Social Security Numbers

Providing a Social Security Number is voluntary. To comply with the Tax Payer Relief Act of 1997, Rogue Community College must obtain correct Social Security Numbers (SSN) to file returns with the Internal Revenue Service (IRS) and to furnish a statement to students. The returns filed by RCC must contain information about qualified tuition and related expenses.

Section 6109 of the Internal Revenue Code, requires that people give their correct SSN to agencies who must file information returns with the IRS. The IRS uses SSNs for identification and to verify the accuracy of tax returns. For more information, please refer to Internal Revenue Code section 6050S.

Social Security Numbers become part of permanent student records and will be used for keeping records, doing research, aggregate reporting, extending credit and collecting debts. Social Security Numbers will not be given to the general public. Those who choose not to provide Social Security Numbers will not be denied any rights as a student. Providing a Social Security Number implies consent to use of the number in the manner described.

OAR 589-004-0400 authorizes Rogue Community College to ask students to provide their SSNs. The number will be used by the college for reporting, research, and record keeping. The SSNs will also be provided by the college to the Higher Education Coordinating Commission (HECC), which is the single state entity responsible for ensuring pathways to higher educational success for Oregonians statewide, and serves as a convener of the groups and institutions working across the public and private higher education arena. HECC gathers information about students and programs to meet state and federal reporting requirements. It also helps colleges plan, research, and develop programs. This information helps the colleges to support the progress of students and their success in the workplace and other education programs. When reporting, Rogue Community College will disclose a Social Security Number only in a manner that does not permit personal identification of a student by individuals other than representatives of the college. In accordance with FERPA, data suppression rules shall be applied when statistical cell results in less than seven records in order to protect the individual identities of students.

HECC or the college may provide Social Security Numbers to the following agencies or match with records from the following systems:

- State and private universities, colleges, and vocational schools, to find out how many community college students go on with their education and to find out whether community college courses are a good basis for further education;



- The Oregon Employment Department, which gathers information, including employment and earnings, to help state and local agencies plan education and training services to help Oregon citizens get the best jobs available;
- The Oregon Department of Education, to provide reports to local, state and federal governments. The information is used to learn about education, training, and job market trends for planning, research, and program improvement.
- The Internal Revenue Service for the purpose of filing tax information and supplying 1098T statements to students.
- The Oregon Department of Revenue and collection agencies only for purposes of processing debts if credit is extended to you by the college.
- The American College Testing Service for educational research purposes.

Responsibility for Educational Records

The following college administrators may be contacted to discuss the security of educational records: Vice President of Operations and Finance, Vice President of Student Learning and Success and Registrar.

Rescinds Procedure Number: AP-013 (partial)

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Titles and/or Department names updated February 27, 2025