



**Northwest**  
**UNIVERSITY**

**Family Educational Rights  
and Privacy Act**

**~ FERPA ~**

**Student Records  
Policy and Procedures**

*(effective: December 2017)*

## **DEFINITIONS**

For the purposes of this policy, Northwest University has used the following definitions of terms.

Student - any person who attends or has attended Northwest University.

Education Records - any record (in handwriting, print, tapes, film, or other medium) maintained by Northwest University or an agent of the University which is directly related to a student. These records include but are not limited to grades, transcripts, class lists, student course schedules, student financial information, and student discipline files. Exceptions:

1. A personal record kept by a staff member, if it is kept in the personal possession of the individual who made the record, and information contained in the record has never been revealed or made available to any other person except the maker's temporary substitute.
2. An employment record of an individual whose employment is not contingent on the fact that he/she is a student, provided the record is used only in relation to the individual's employment.
3. Records maintained by the Health Clinic or Counseling Office if the records are used only for treatment of a student and made available only to those persons providing the treatment.
4. Alumni records which contain information about a student after he/she is no longer in attendance at the University and the records do not relate to the person as a student.

FERPA - The Family Educational Rights and Privacy Act of 1974.

## **ANNUAL NOTIFICATION**

Students will be notified of their FERPA rights annually by publication in the student handbook and in the Northwest University Academic Catalog.

## **PROCEDURE TO INSPECT EDUCATION RECORDS**

Students may inspect and review their education records upon request to the appropriate record custodian.

Students should submit to the record custodian or an appropriate University staff person a written request which identifies as precisely as possible the record or records they wish to inspect.

The record custodian or an appropriate University staff person will make the needed arrangements for access as promptly as possible and notify the student of the time and place where the records may be inspected. Access must be given in twenty-five (25) working days or less from the receipt of the request.

When a record contains information about more than one student, the student may inspect and review only the records which relate to him/her.

## **RIGHT OF UNIVERSITY TO REFUSE ACCESS**

Northwest University reserves the right to refuse to permit a student to inspect the following records:

1. The financial statement of the student's parents.
2. Letters and statements of recommendation for which the student has waived his/her right of access, or which were placed in file before January 1, 1975.
3. Records connected with an application to attend Northwest University if that application was denied.
4. Those records which are excluded from the FERPA definition of education records.

## **REQUEST FOR COPIES**

If health reasons or extreme distance from the University prevents the student from inspecting the education record, copies of the specific education record requested will be mailed to the student. The student must pay all copying expenses in advance of the release of the record. The student's Northwest University transcript shall be provided at the fee set forth in the current University catalog. All other copies shall be made at a cost of \$.25 per page copied.

## **REFUSAL TO PROVIDE COPIES**

Northwest University reserves the right to deny official transcripts and/or copies of records not required to be made available by FERPA in any of the following situations:

1. The student has an unpaid financial obligation to the University; or
2. There is an unresolved disciplinary action against the student.
3. The student lives within commuting distance of Northwest University.

Northwest University reserves the right not to provide copies of transcripts it has received from other educational institutions.

## **TYPES, LOCATIONS AND CUSTODIANS OF EDUCATION RECORDS**

The following is a list of the types of records that the University maintains, their locations, and their custodians.

<b>Record Type</b>	<b>Location</b>	<b>Custodian</b>
Academic Records	Registrar's Office Davis Administration Building 5520 108th Avenue N.E. Kirkland, WA 98033	Registrar
Admission Records	Admissions Office Barton Building 5520 108th Avenue N.E. Kirkland, WA 98033	Director of Admissions
Financial Records	Student Financial Services Barton Building 5520 108th Avenue N.E. Kirkland, WA 98033	Senior Director of Student Financial Services
Disciplinary Records	Student Development Pecota Student Center 5520 108th Avenue N.E. Kirkland, WA 98033	Dean of Student Development
Health Records	Wellness Center 5520 108th Avenue N.E. Kirkland, WA 98033	Director
Occasional records (Student education records not included in the types listed above)	The appropriate official will collect such records, direct the student to their location, or otherwise make them available for inspection and review	The University staff person who maintains such occasional systems records

## **DISCLOSURE OF EDUCATION RECORDS**

Northwest University will not disclose information from a student's education records without the written consent of the student, except:

1. To school officials who have a legitimate educational interest in the records.  
  
A school official is:
  - a. a person employed by the University in an administrative, supervisory, academic or research, or support staff position;
  - b. a person elected to the Board of Directors;
  - c. a person employed by or under contract to the University to perform a special task, such as the attorney or auditor.
  - d. a volunteer who has been approved and assigned to compete specific assign duties that require access to the student's education records;  
A school official has a legitimate educational interest if the official is:
  - a. performing a task that is specified in his/her position description or by a contract agreement;
  - b. performing a task related to a student's education;
  - c. performing a task related to the discipline of a student;
  - d. providing a service or benefit relating to the student or student's family, such as health care, counseling, job placement or financial aid.
2. To officials of another school, upon request, in which a student seeks or intends to enroll. The University will attempt to notify the student regarding such request. An official transcript, however, will not be sent without a written request from the student.
3. To certain officials of the U.S. Department of Education, the Comptroller General, and state and local educational authorities, in connection with certain state or federally supported education programs.
4. In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid.
5. If required by a state law requiring disclosure that was adopted before November 19, 1974.
6. To organizations conducting certain studies for or on behalf of the University.

7. To accrediting organizations to carry out their functions.
8. To parents of an eligible student who claim the student as a dependent for income tax purposes.
9. To comply with a judicial order or a lawfully issued subpoena.
10. To appropriate parties in a health or safety emergency (e.g. the University's Communicable Disease Policy and Emergency Preparedness Policy).
11. To the student over the phone or in person if the correct student I.D. number and the correct answer to a personal identifying question. Examples of type of question *might be* high school attended, last school attended. Only the following information can be released: the student's
  - Financial student account balance
  - Payment schedule
  - Refund amount
  - Financial charges
  - Financial credit

### **RECORD OF REQUESTS FOR DISCLOSURE**

Northwest University will maintain a record of all requests for and/or disclosure of information from a student's education records. The record will indicate the name of the party making the request, any additional party to whom it may be re-disclosed, and the legitimate interest the party had in requesting or obtaining the information.

### **DIRECTORY INFORMATION**

Northwest University designates the following items as Directory Information: the student's:

- name
- address
- parent's name and address
- telephone number
- date and place of birth
- major field of study
- participation in officially recognized activities and sports
- weight and height, if a member of an athletic team
- dates of attendance
- degrees and awards received
- most recent previous school attended
- photograph.

The University may disclose any of these items without prior written consent, unless notified in writing to the contrary within one (1) week after official registration each semester.

## **CORRECTION OF EDUCATION RECORDS**

Students have the right to ask to have records corrected that they believe are inaccurate, misleading or in violation of their privacy rights. Following are the procedures for the correction of records:

1. A student must ask the Registrar of Northwest University in writing to amend a record. In so doing, the student should identify the part of the record he/she wants changed and specify why he/she believes it is inaccurate, misleading or in violation of his/her privacy or other rights.
2. Northwest University may comply with the request or it may decide not to comply. If it decides not to comply, Northwest University will notify the student of the decision and advise him/her of his/her right to a hearing to challenge the information believed to be inaccurate, misleading, or in violation of the student's rights.
3. Upon request, Northwest University will arrange for a hearing and notify the student reasonably in advance of the date, place and time of the hearing.
4. The hearing will be conducted by the Registrar of Northwest University or other disinterested party appointed by the University. The student shall be afforded a full and fair opportunity to present evidence relevant to the issues raised in the original request to amend the student's education records. The student may be assisted by one or more individuals, including an attorney.
5. Northwest University will prepare a written decision based solely on the evidence presented at the hearing. The decision will include a summary of the evidence presented and the reasons for the decision.
6. If Northwest University decides that the challenged information is not inaccurate, misleading, or in violation of the student's right of privacy, it will notify the student that he/she has a right to place in the record a statement commenting on the challenged information and/or a statement setting forth reasons for disagreeing with the decision.
7. The statement will be maintained as part of the student's education records as long as the contested portion is maintained. If Northwest University discloses the contested portion of the record, it must also disclose the statement.
8. If Northwest University decides that the information is inaccurate, misleading, or in violation of the student's right of privacy, it will amend the record and notify the student, in writing, that the record has been amended.