



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 1 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

PURPOSE:

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when they reach the age of 18 or attend a school beyond the high school level. Students to whom the rights have transferred are "eligible students."

BACKGROUND:

Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR Part 99; § 513 of P.L. 93-380; P.L. 93-568; P.L. 96-46; P.L. 101-542; P.L. 102-325; P.L. 103-382; P.L. 105-244

CSU Executive Order 796: Privacy and Personal Information Management Student Records Administration

Collective Bargaining Agreement for Unit 11 (UAW – Academic Student Employees)

POLICY:

Accountability:

Executive Order 796 states: "Each campus shall adopt a written policy statement establishing procedures by which the campus intends to comply with FERPA and this executive order. These procedures shall include a requirement to periodically review campus information management practices concerning student records at least every two years or more often as the need arises."

The University Registrar is responsible for the biannual review of this document. This policy also clarifies secondary roles and responsibilities in University procedures for ensuring compliance. The Custodian of Education Records will vary, based on the type of record, as listed on the following page.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 2 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Types, Locations and Custodians of Education Records

Type of Record	Location	Custodian of Record
Academic (e.g. transcript, transfer work, class schedule, degree requirements, academic notice, petitions, etc.)	Registrar's Office Sage Hall	University Registrar
Disciplinary / Student Life / Campus Access, Retention and Equity (CARE) Team	Dean of Students Office Bell Tower	Dean of Students
Discrimination, Harassment, and Retaliation	Title IX and Inclusion Office	Title IX Coordinator
Financial Aid	Financial Aid and Scholarships Sage Hall	Director of Financial Aid and Scholarships
Student Housing, Tenant and Disciplinary	Housing and Residential Education Santa Cruz Village	Senior Director of Housing and Residential Education
Student Accounts	Student Financial Services Lindero Hall	Vice President for Business and Financial Affairs
Student Payroll	Human Resources Lindero Hall	Associate Vice President for Human Resources
Public Safety	Public Safety Unit Placer Hall	Chief of Police
Occasional (e.g. correspondence in office not listed above)	Registrar's Office Sage Hall	University staff who maintains the record
Veterans	Registrar's Office Sage Hall	University Registrar

A current listing of types, locations and custodians of education records will be maintained on the University's website.

Applicability:

All students who are attending or have attended California State University Channel Islands.

Definition(s):

For the purposes of this policy:

Student – Any person who applies, enrolls or has been enrolled at California State University Channel Islands.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 3 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Parent – parent of a California State University Channel Islands student, including a natural parent, a guardian, legally authorized parent or an individual authorized to act as a parent in the absence of a parent or guardian.

Third Parties – Non-university persons or entities.

University – Hereafter in this document a reference to California State University Channel Islands.

University Official – University employees who have a legitimate educational interest in the records.

Education Records – Any record (in handwriting, print, tapes, film or other medium) maintained by California State University Channel Islands, or an agent of the University, which is directly related to a student except:

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 or she is a student, provided the record is used only in relation to the individual's employment.
3. Records maintained by the University's Student Health Services, Counseling and Psychological Services, or Disability Accommodations and Support Services, if the records are used only for treatment of a student and made available only to those persons providing treatment.
4. Alumni records which contain information about a student after they are no longer in attendance at the University and the records do not relate to the person as a student.

Legitimate Educational Interest – a University Official has a legitimate educational interest in the protected education records, a legal "right to know" if the official is:

1. Performing a task that is specified in their position description or contract agreement;
2. Performing an instructional task directly related to the student's education;
3. Performing a task related to the discipline of a student;
4. Performing as a faculty advisor, program director or dean; (this pertains exclusively to access to the student's academic records);
5. Providing a service or benefit relating to the student or student's family, including, but not limited to, health care, counseling, career counseling or financial aid;
6. Maintaining the safety and security of the campus and campus community.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 4 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

The custodian of record as designated in the “Accountability” section above, will determine whether a legitimate educational interest exists, whether the University Official has a legal right to know, on a case-by-case basis. When the custodian has any question regarding the request, the custodian should withhold disclosure unless the custodian obtains written consent from the student or the concurrence of a supervisor or other appropriate official that the record may be released.

Text:

California State University Channel Islands is committed to meeting the provisions established in the Family Educational Rights and Privacy Act (FERPA), which protects the rights of students who are enrolled or who were previously enrolled the University.

Annual Notification

The University will notify currently enrolled students of their rights under FERPA by sending electronic communication to students and publishing notices in the University catalog and on the California State University Channel Islands website.

Disclosure of Education Records to Student

Procedure for Students to Inspect Their Education Records

To review an education record, a student must submit a written request to the University Registrar. If students wish to review their disciplinary records, the written request must be submitted to the Dean of Students. The student must sign the request; describe the specific records to be reviewed; and must set forth the name under which the student attended the University, the student’s ID number, and the student’s last date of attendance.

Proper picture identification must be presented before the documents may be reviewed. The custodian of record, or the custodian’s designee, may waive the requirement for a written request. For example, the custodian of record for the student account may waive the requirement for a written request when the student requests a copy of the current bill.

The custodian of record or an appropriate designee will make the needed arrangements for access as promptly as possible and advise the student when and where the records will be available for inspection. Access will be given within 45 working days or less after receipt of the written request.

Some student records may be destroyed (per the CSU records retention policy) and therefore, the file may not exist for the student to inspect.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 5 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Right of University to Refuse Access

The University reserves the right to refuse permission to the inspection and review of:

- Financial statements of the student's parents;
- Confidential letters and confidential statements of recommendation placed in the education record before January 1, 1975, if the student has waived their right to inspect and review those letters and statements, and the letters and statements relate to the student's admission to an educational institution, application for employment, or
- Receipt of an honor or honorary recognition; or
- Confidential letters and confidential statements placed in the education record after January 1, 1975 for which the student has waived the right of access in writing for admission, employment, or receipt of an honor or honorary recognition, except when these documents have been used for any purpose other than that for which they were originally intended; and
- Documents excluded from the FERPA definition of education records (such as those listed in the "Definitions" section above).

Refusal to Provide Copies

The University reserves the right not to provide copies of transcripts it has received from other education institutions. It also reserves the right to deny copies of the University transcripts if the student has an unpaid financial obligation to the University.

Request for Copies

If health reasons or extreme distance from the University prevents the student from inspecting the education record, then 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 requirement of a written request will not be waived in these circumstances.

Disclosure of Education Records to Other Than the Student to Whom the Record Pertains

Disclosure of Education Records to University Officials

The University will disclose information from a student's education records to University Officials who have a legitimate educational interest in the records.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 6 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Disclosure to Others

California State University Channel Islands may disclose information from a student's education records to other than University officials only with written consent of the student, *except*:

1. To officials of another school where the student seeks or intends to enroll;
2. To certain authorized government representatives;
3. In connection with the student's financial aid request or award and the information is necessary for certain purposes set forth in the regulations;
4. To organizations conducting studies for or on behalf of the University;
5. To accrediting organizations to carry out their accrediting function;
6. To comply with a judicial order or lawfully issued subpoena and the University has made reasonable effort to notify the student of the order or subpoena in advance of compliance;
7. To appropriate parties in a health or safety emergency;
8. To victims of crimes of violence or of a non-forcible sex offense who requests the final results of a disciplinary review process held by the institution against the perpetrator on account of the crime or offense.
9. In connection with the University's obligation to respond to a request from military recruiters made under the Solomon Amendment. (Solomon Amendment [63 Fed. Reg. 56819] and the Interim Rule [65 Fed. Reg. 2056])

Records of Requests for Disclosure to Individuals Other Than the Student or University Officials

A record will be maintained of all requests for access to and disclosures of information from the education records of each student except as stated below. The record will indicate the date and type of records released, the name of the party making the request, any additional Party to whom it may be disclosed and the party's legitimate interest in requesting or obtaining the information. The record may be reviewed by the student. A record of disclosures does not need be kept if those disclosures were made to the student, a University official with legitimate educational interests, a party with written consent from the student, or a party seeking directory information.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 7 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Directory Information

The University designates the following items as directory information:

- Student's name
- University assigned e-mail address
- Major field of study
- Dates of attendance
- Enrollment Status (class level)
- Full-time or part-time status
- Degrees, awards, and honors received
- Dates degrees conferred
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams

For Student Employees:

- Department where employed
- Employee Status (i.e. Graduate Assistant, Instructional Student Assistant, Teaching Associate)

Directory information may be released without prior written approval unless notified in writing by the student that all information is to be held in confidence by the University. Requests to withhold directory information should be sent in writing to the Registrar's Office. The student's records will be kept confidential until the student requests in writing that the confidentiality hold be removed.

Challenge and Correction of Education Records

Students have the right to ask to have education records corrected that they believe are inaccurate, misleading, or in violation of the privacy or other rights of the student. The following are the procedures for correcting the records.

The student must request an informal discussion of the questionable item with the custodian of record, who will determine whether to comply.

1. If the student is not satisfied with the result and still wishes to have the record corrected, the student must submit a written request for a change in the education record. This written request must state why the education record is inaccurate, misleading or violates the privacy or other rights of the student. This request must be given to the University Registrar. The University Registrar will then forward the request to the appropriate custodian of record and respective Cabinet member (or designated Administrator) for review and decision.



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 8 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

2. The Custodian of Record will notify the student of the decision and provide a copy to the University Registrar. The decision will include either compliance with the requested change, or a denial and opportunity to a hearing to challenge the information believed to be inaccurate, misleading, or in violation of the student's rights.
3. The student must provide a written request for a hearing to the AVP EM's office. A hearing shall be arranged within thirty (30) working days after receipt of the request. The student shall be notified at least fifteen (15) working days in advance of the date, time and place of the hearing. The right to a hearing does not include any right to challenge the appropriateness of a grade determined by an instructor. The Registrar's Office can apprise students of the appropriate process for challenging a grade.
4. The President (or designee) shall appoint a hearing officer to conduct a hearing. The hearing officer shall be a disinterested party; however, the hearing officer may be a University agent. The student will 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. In accordance with University policy, attorneys will not be permitted to attend the hearing.
5. The hearing officer will submit a written decision to the student and a copy to the AVP EM based on the evidence presented at the hearing. The decision must be made in writing to the student within fifteen (15) days after the hearing.
6. If the University's decision is that the challenged information is inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, the record will be amended accordingly, and the student will be notified in writing by the Custodian of Record when the amendment is complete.
7. If the University's decision is that the challenged information is not inaccurate, misleading, or in violation of the student's right of privacy, the hearing officer will inform the student of the right to place a statement in the record commenting on the challenged information and/or a statement setting forth reasons for disagreeing with the decision. This statement will be maintained as part of the education record as long as that record is maintained, and the statement will be disclosed whenever the University discloses the portion of the record to which the statement relates. The hearing officer's decision is final.

Compliance with FERPA

A student has the right to file a complaint with the U.S. Department of Education concerning alleged failures by the University to comply with the requirements of FERPA. The name and address for the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education 400 Maryland Ave.
SW Washington, DC 20202-4605



CALIFORNIA STATE UNIVERSITY CHANNEL ISLANDS ADMINISTRATIVE POLICY MANUAL

Academic Affairs
Approved By: Richard Yao
President

Policy Number: AA.14.002
Effective Date: 03/24/2025
Page 9 of 9

Policy on Family Educational Rights and Privacy Act (FERPA)

Periodic Review of Campus Information Management Practices

Per California State University Executive Order No. 796, a periodic review of campus information management practices concerning student records will be conducted at least every two years or more often as the need arises.

1. The campus Compliance Officer will have the responsibility for ensuring that the periodic review is conducted and that appropriate reports resulting from these reviews be submitted to the President to be forwarded to the Chancellor's Office.
2. Any recommended changes to the policy and/or its procedures will be the responsibility of the Compliance Officer to complete in consultation with designated records custodians.

EXHIBIT(S):

N/A