



## PASADENA AREA COMMUNITY COLLEGE DISTRICT POLICY

**Title: Student Educational Records**

**Policy No. 4010**

**Legal Authority:** Title 34, Code of Federal Regulations, Part 99;  
Title 5 Sections 54600-54626

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**It is the policy of the Pasadena Area Community College District** that Pasadena City College has a legal and professional responsibility to create, maintain, and dispose of the educational records of the students of the College properly, while at all times guarding the integrity and confidentiality of those records. Appropriate procedures shall be developed which conform with applicable laws and regulations and with principles of sound records management.

**PASADENA AREA COMMUNITY COLLEGE DISTRICT  
PROCEDURES  
For Policy No. 4010**

**Title: Student Educational Records**

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1. **Definition of Education Records**  
Education records consist of those files maintained by Admissions and Records, the Career/Job Placement Center, Scholarships and Financial Aids, and the Health Center, and those files maintained for individual students by academic divisions.
2. **Access to Education Records**  
All students have the right to inspect and review their educational records. A student who follows the established procedure of the Records Office shall be granted access to his or her records within 15 days of the request. Expressly exempted from the right of review and inspection are the following materials:
  - a. Financial records of the parents of the students.
  - b. Confidential letters and statements of recommendation which were placed in the education records prior to January 1, 1975.
  - c. Records of instructional, supervisory, counseling and administrative personnel which are in their sole possession and are not accessible or revealed to any other person except a teacher substituting for the one in sole possession.
  - d. Records of students made and maintained by the Health Center and the Learning Disabilities Center, which are used in the treatment of students and which are not available to persons other than those providing such treatment; except that such records can be reviewed by an appropriate professional of the student's choice.
3. **Procedure for a Student's Access to Records**
  - a. A student may review his or her records upon appropriate identification and in conference with a College Counselor or other certificated Student and Learning Services staff member.
  - b. A former student may request in writing a review of his or her records. The request should be directed to the Associate Dean of Admissions and Records who is the designated "Records Officer" acting for the College President.
  - c. Any student request for review shall be granted no more than 15 days following the request.
4. **Procedure for Challenge of Accuracy or Content of Education Records**
  - a. **Informal**  
A student may file with the Associate Dean of Admissions and Records a Student Petition which challenges the accuracy or content of education records maintained by the College. The Student Petition should be supported with documentation. The Petitions Committee will rule on the request and notify the student. The student not satisfied with the decision may discuss the matter with the Vice President of Student and Learning Services, who may make a determination.
  - b. **Formal**  
If the student is not satisfied with the determination made by the Vice President of Student and Learning Services, the student may, within 30 days, appeal the decision in writing to the College President.

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5. Release of Education Records Information
- a. Any release of a student's education records, with the exceptions listed, must be with the student's written consent or request.
  - b. Directory Information: In accordance with the Federal Family Educational Rights and Privacy Act of 1974, the California Education Code, and Title 5 of the California Code of Regulations, Pasadena City College will make available upon request certain "directory information" when appropriate. This information consists of the following: A student's name; city of residence; major field of study; participation in officially recognized activities and sports; if member of an athletic team, weight, height, and age; dates of enrollment; degree and awards received; and the most recent previous educational institution attended by the student.
  - c. Without the student's written consent and upon authorization of the Associate Dean of Admissions and Records or his designee, the College may release copies of, or otherwise divulge, material in student education records to the following agencies and individuals who are expressly forbidden from permitting access of said education records to third parties:
    - (1) College and district staff with a legitimate educational interest.
    - (2) Authorized representatives of the Comptroller General of the United States, the Secretary of Education, an administrative head of an education agency, state education officials, or their respective designees, or the United States Office of Civil Rights, where such information is necessary to audit or evaluate a state or federally supported education program or pursuant to a federal or state law, except that when collection of personally identifiable information is specifically authorized by federal law, any data collected by those officials shall be protected in a manner which will not permit the personal identification of students or their parents by other than those officials, and such personally identifiable data shall be destroyed when no longer needed for such audit, evaluation, and enforcement of federal legal requirements.
    - (3) Other state and local officials or authorities to the extent that information is specifically required to be reported pursuant to state law adopted prior to November 19, 1974.
    - (4) Officials of other public or private schools or school systems, including local, county, or state correctional facilities where educational programs are provided, where the student seeks or intends to enroll, or is directed to enroll, subject to the rights of students as provided in Section 76225 of the Education Code.
    - (5) Agencies or organizations in connection with a student's application for, or receipt of, financial aid; provided that information permitting the personal identification of students may be disclosed only as may be necessary for such purposes as to determine the eligibility of the student for financial aid, to determine the amount of the financial aid, to determine the conditions which will be imposed regarding the financial aid, or to enforce the terms or conditions of the financial aid.
    - (6) Accrediting organizations in order to carry out their accrediting functions.
    - (7) Organizations conducting studies for, or on behalf of, educational agencies or institutions for the purposes of developing, validating, or administering predictive tests, administering student aid programs, and improving instruction, if such 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 such organizations and such information will be destroyed when no longer needed for the purpose for which it is collected.

- (8) Appropriate persons in connection with an emergency if the knowledge of such information is necessary to protect the health or safety of a student or other persons, or subject to such regulations as may be issued by the Secretary of Education.
- (9) Those who have obtained subpoena or judicial order. The College will make a reasonable effort to notify the student in advance of the College's compliance with the order.

6. Record of Access

The College will maintain an access list which includes the identity of persons other than College officials who have requested and have been denied or who have had access to student records, the dates of said requests, and the reasons for such access.

7. Transfer of Information to Third Parties

Education records of personal information transferred to a third party will include a notice that such party shall not permit access by any other party without the written consent of the student.

8. Notice of Student Rights

Students will be informed at least annually through the Pasadena City College Catalog and other publications of their rights under these procedures.