

Book	Policy Manual
Section	200 Pupils
Title	Student Records
Code	216
Status	Draft

Authority

The Board recognizes its responsibility for the collection, retention, disclosure and protection of student records. The Board also recognizes the legal requirement to maintain the confidentiality of student records and prohibits the unauthorized access, reproduction, and/or disclosure of student education records and personally identifiable information from such records.[\[1\]](#)[\[2\]](#)[\[3\]](#)[\[4\]](#)[\[5\]](#)[\[6\]](#)[\[7\]](#)[\[8\]](#)[\[9\]](#)[\[10\]](#)[\[11\]](#)[\[12\]](#)[\[13\]](#)

The district shall maintain a comprehensive plan for the collection, maintenance and dissemination of student education records that complies with federal and state laws and regulations and state guidelines.

Definitions

Education records - records that are directly related to a student, maintained by the school district or by a party acting for the school district.[\[11\]](#)[\[14\]](#)

The term does not include:

1. Records kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to another individual except a temporary substitute for the maker of the record.
2. Records created or received by the district after an individual is no longer a student in attendance and that are not directly related to the individual's attendance as a student.
3. Grades on peer-graded papers before they are collected and recorded by a teacher.
4. Other records specifically excluded from the definition of education records under the Family Educational Rights and Privacy Act (FERPA) and its implementing regulations.

Delegation of Responsibility

The Superintendent or designee shall be responsible for developing, implementing, and monitoring the student records plan.

All district personnel having access to student education records shall receive training in the requirements of Board policy, student records plan, and applicable federal and state laws and regulations as directed by the Superintendent.

Each district-teacher shall prepare and maintain a record of the work and progress of each student, including the final grade and a recommendation for promotion or retention.[\[5\]](#)[\[15\]](#)[\[16\]](#)

Guidelines

The district's plan for the collection, retention, disclosure and protection of student records shall provide for the following:

1. Safeguards to protect the student records when collecting, retaining and disclosing personally identifiable information.
2. Ensuring that parents and eligible students, including those who are disabled or have a primary language other than English, are effectively notified of their rights and the procedures to implement those rights, annually and upon enrollment.[\[17\]](#)
3. Procedures for the inspection, review, and copying of a student's education records by parents and eligible students. The district may charge a fee for copies of records that are made for parents so long as the fee does not effectively prevent parents from exercising their right to inspect and review those records. The district shall not charge a fee to search for or to retrieve information in response to a parental request.[\[18\]](#)[\[19\]](#)[\[20\]](#)
4. Procedures for requesting the amendment of a student's education records that the parent or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights.[\[21\]](#)
5. Procedures for requesting and conducting hearings to challenge the content of the student's education records.[\[22\]](#)[\[23\]](#).
6. Enumerating and defining the types, locations and persons responsible for education records maintained by the district.
7. Determining the types of personally identifiable information designated as directory information.[\[14\]](#)[\[24\]](#)
8. Establishing guidelines for the disclosure and redisclosure of student education records and personally identifiable information from student records.[\[25\]](#)
9. Reasonable methods to ensure that school district officials obtain access to only those education records in which they have a legitimate educational interest. Such methods shall include criteria for determining who constitutes a school district official and what constitutes a legitimate educational interest.[\[17\]](#)[\[26\]](#).
10. Maintaining required records of requests for access and each disclosure of personally identifiable information from each student's education records.[\[27\]](#)
11. Ensuring appropriate review, retention, disposal and protection of student records.[\[28\]](#)
12. Transferring education records and appropriate disciplinary records to other school districts.[\[1\]](#)

Student Recruitment

Procedures for disclosure of student records and personally identifiable information shall apply equally to military recruiters and postsecondary institutions and shall comply with law and Board policy.[\[29\]](#)

Missing Child Registration

A missing child notation shall be placed on school records of a student under the age of eighteen (18) reported as missing to school officials by a law enforcement agency. Such notation shall be removed when the school district is notified by the appropriate law enforcement agency that a missing child has been recovered. [\[30\]](#).

In the event the district receives a request for information from the school records of a missing child, the district shall: [\[31\]](#).

1. Attempt to obtain information on the identity of the requester.
2. Contact the appropriate law enforcement agency to coordinate a response.

No information in the records shall be released to the requester without first contacting the appropriate law enforcement agency.

Legal

- [1. 24 P.S. 1305-A](#)
- [2. 24 P.S. 1306-A](#)
- [3. 24 P.S. 1402](#)
- [4. 24 P.S. 1409](#)
- [5. 24 P.S. 1532](#)
- [6. 24 P.S. 1533](#)
- [7. 22 PA Code 12.31](#)
- [8. 22 PA Code 12.32](#)
- [9. 22 PA Code 15.9](#)
- [10. 22 PA Code 4.52](#)
- [11. 20 U.S.C. 1232g](#)
- [12. 34 CFR Part 300](#)
- [13. 34 CFR Part 99](#)
- [14. 34 CFR 99.3](#)
- [15. Pol. 212](#)
- [16. Pol. 215](#)
- [17. 34 CFR 99.7](#)
- [18. 34 CFR 99.10](#)
- [19. 34 CFR 99.11](#)
- [20. 34 CFR 99.12](#)
- [21. 34 CFR 99.20](#)
- [22. 34 CFR 99.21](#)
- [23. 34 CFR 99.22](#)
- [24. 34 CFR 99.37](#)
- [25. 34 CFR 99.30-99.39](#)
- [26. 34 CFR 99.31](#)
- [27. 34 CFR 99.32](#)
- [28. Pol. 113.4](#)
- [29. Pol. 250](#)

[30. 35 P.S. 450.403-A](#)

[31. 35 P.S. 450.404-A](#)

[35 P.S. 450.401-A et seq](#)

[22 PA Code 16.65](#)

Pol. 113

Pol. 113.1

Pol. 216.1