



OLD DOMINION UNIVERSITY

University Policy

Policy #4100

STUDENT RECORD POLICY

Responsible Oversight Executive: Provost and Vice President for Academic Affairs
Date of Current Revision or Creation: September 30, 2009

A. PURPOSE

The University Student Record Policy is formulated to protect the privacy of the student information that is maintained by the University, and yet provide access to student records to those having a legitimate reason to view such records. The regulations and procedures to ensure adequate protection of student records are provided in this policy.

B. AUTHORITY

[Virginia Code Section 23-9.2:3, as amended](#), grants authority to the Board of Visitors to establish rules and regulations for the institution. Section 6.01(a)(6) of the [Board of Visitors Bylaws](#) grants authority to the President to implement the policies and procedures of the Board relating to University operations.

The University Student Record Policy is intended to conform with all State and Federal statutes dealing with access of information held by an educational institution on present and former students. (FERPA Cite 20 U.S.C. 1232 (g); Government Data Collection and Dissemination Practices Act, Code of Virginia Section 2.2-3800, et seq, as amended.)

C. DEFINITIONS

De-identified Data – Data are de-identified if a reasonable determination is made that the student's identity is not personally identifiable, whether through single or multiple releases, taking into account other reasonably available information. Personally identifiable information includes direct identifiers, such as social security number, as well as indirect identifiers, such as the name of the student's parent or family member or other personal information that would allow a reasonable person in the community to identify the student with reasonable certainty.

Student Records refers to those files and their contents that are maintained by official units of the University.

D. SCOPE

This policy applies to authorized employees and volunteers accessing, for any reason, the records of all students who attend or have attended Old Dominion University. Employees include all staff, administrators, faculty, full- or part-time, and classified or non-classified persons who are paid by the University.

E. POLICY STATEMENT

Generally, students have the right to review any official record that the University maintains on them. Generally, access to records by others, without student permission, is limited to purposes of an educational nature. When access is permitted, documents will be examined only under conditions that will prevent unauthorized removal, alteration or mutilation. Information to which the student does not have access is limited to:

- Financial records of parents or guardians;
- Confidential letters of recommendation received by the University prior to January 1, 1975;
- Specific confidential letters of recommendation received by the University on or after January 1, 1975, for which students have waived their right of access;
- Medical-psychological records used in connection with treatment of the student. Such records, however, can be reviewed by the physician or psychologist of the student's choice; and
- Old Dominion University Police Department and Department of Human Resources records, when utilized for internal purposes by those offices in their official capacities.

The University Registrar is the custodian of the official academic record maintained by the University and is the office designated to release official transcripts on behalf of the University. The Office of the University Registrar is the initial point of contact for questions related to these rules. Subpoenas seeking education records are typically served on the University Registrar by the Old Dominion University Police Department, and the Office of the University Registrar should be informed whenever the University or a University employee is served with a subpoena seeking education records. A copy of each subpoena shall be furnished to the Office of the University Counsel. No documents shall be released or information disclosed until University Counsel determines that the subpoena is valid.

Only the following offices are authorized to release non-directory information upon written authorization of the student, subpoena or court order: Office of the University Registrar, Career Management Center, University Controller's Office, Student Financial Aid Office, Office of the Dean of Students and Chief Student Affairs Officer, University College, and academic colleges. The non-directory information that these offices are permitted to release includes, but is not limited to, the following:

- Office of the University Registrar: admission records, cumulative academic records, Veteran's records, transfer records
- Career Management Center: information necessary to gain or maintain employment (part time, work/study, co-op/internship, full time)
- Student Financial Aid Office: financial aid records (scholarships, grants, etc.)
- Office of the Dean of Students and Chief Student Affairs Officer: disciplinary and student organization records
- University College and Academic Colleges: advising records
- University Controller's Office: business records (tuition, fees, etc.)

The appropriate official will collect and maintain records not included in the categories listed above and will make them available for inspection and review.

1. Access to Student Records by the Student

- a. A student has the right to inspect his/her record (as defined earlier in this section) and is entitled to an explanation of any information therein.
- b. Documents submitted to the University will not be returned to the student. Academic records received from other institutions will not be sent to third parties external to the University or released to the student. The student must request those records from the originating institution.
- c. Official records and transcripts of the University (signature and/or seal affixed) will be mailed directly to other institutions or agencies at the student's request. Official records given directly to the student will be clearly marked "Issued to Student."
- d. Should a student believe his/her record is incorrect, a written request must be submitted to the appropriate University official indicating the incorrect information and the information that should be entered. The official will respond within 14 business days of the student's request.

2. Access to Student Records by Others

- a. Old Dominion University hereby designates the following information as public directory information. Such information may be disclosed by the institution at its discretion:
 1. Name;
 2. Address;
 3. Telephone Number;
 4. E-Mail Address;
 5. Date of birth;
 6. Gender;
 7. Photograph;
 8. Major field of study;
 9. Participation in officially recognized activities;
 10. Weight and height of athletic team members;
 11. Dates of attendance;
 12. Degrees, honors, and awards received; and
 13. The most previous educational institution attended.

Except as described in item 7 below, directory information will not be released for commercial purposes by administrative offices of the University.

- b. Currently enrolled students may withhold disclosure of directory information under the Family Educational Rights and Privacy Act of 1974. To withhold disclosure, written notification must be submitted to the Office of the University Registrar to effect disclosure for the same term.
- c. Grades should not be posted in a public place. Students should be referred to www.leonline.odu.edu to view their grades.

- d. Confidential information should not be released by telephone or any other method for which authentication of the requestor is not practicable.
 - e. All other student information will be released only upon written request of the student, except those instances cited below.
3. Disclosure to Members of the University Community
- a. Access to student records for administrative reasons for faculty and administrative staff is permissible provided that such persons are properly identified and can demonstrate a legitimate educational interest in the material.
 - b. Access to de-identified data for the purpose of research by faculty, administrative staff, and graduate students is permissible when authorized by the department head and the administrator of the office concerned. An authorization form that also specifies conditions of confidentiality is provided for this purpose.
 - c. Information requested by student organizations of any kind will be provided only when authorized by the Dean of Students and Chief Student Affairs Officer.
4. Disclosure to Parents and Organizations Providing Financial Support to the Student
- a. Records may be released without prior student approval to a parent or guardian on whom the student is financially dependent. Parents or guardians must furnish Federal tax records for the prior year that demonstrate tax dependency to the Office of the University Registrar. Students will be informed when the record is released.
 - b. Records may be released to organizations providing financial support to a student upon official request and written waiver from the student.
5. Disclosure to Other Educational Agencies and Organizations
- Information may be released to another institution of learning, research organization, or accrediting body for legitimate educational reasons provided that any data shall be protected in a manner that will not permit the personal identification of the student by a third party.
6. Disclosure in Connection with Audit or Evaluation of Federal or State Supported Education Programs
- Authorized representatives of the following entities are permitted access to student records when the disclosure is in connection with an audit or evaluation of Federal or State supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs:
- Comptroller General of the U.S.
 - Secretary of Education
 - U.S. Attorney General (for law enforcement purposes only)
 - State and local authorities

Information collected for this purpose must be protected in a manner that does not permit personal identification of individuals by anyone except to the officials of the agencies identified above and such records must be destroyed when no longer needed for the purposes identified above.

7. University-Affiliated Foundations and Organizations

Under very specific and clearly defined circumstances, University-affiliated foundations or organizations may have access to student directory information and may release this information to third-party vendors for purposes of communicating with current and former students as well as parents about benefits offered by the vendor. These circumstances may include, but are not limited to, affinity partnerships with the Alumni Association.

This information may be made available to third-party vendors only when a formal request is made to and approved by the University Registrar, and only if the use and dissemination of such information is consistent with University policies and procedures and State and Federal laws and regulations, including the Federal Educational Rights and Privacy Act (FERPA).

F. PROCEDURES

Administrators, faculty and staff who work with student records and confidential student information should complete training on the Family Educational Rights and Privacy Act of 1974 offered by the Office of the University Registrar and available on-line in several formats. Questions about the policy and implementation should be referred to the University Registrar.

G. RESPONSIBLE OFFICER

University Registrar

H. RELATED INFORMATION

[U.S. Department of Education Family Policy Compliance Office; Family Educational Rights and Privacy Act of 1974 \(FERPA\)](#)

[Virginia Freedom of Information Act, Code of Virginia Section 2.2-3705.4, as amended](#)

[Government Data Collection and Dissemination Practices Act, Code of Virginia Section 2.2-3800, et seq, as amended](#)

[American Association of Registrars and Admission Officers \(AACRAO\)](#)

[Old Dominion University Records Management Policy](#)

[ODU Alumni Association Affinity Partnerships](#)

POLICY HISTORY

Policy Formulation Committee (PFC) & Responsible Officer Approval to Proceed:

Responsible Officer Signature

Date

Policy Review Committee (PRC) Approval to Proceed:

/s/ Donna W. Meeks
Policy Review Committee (PRC),
Chair Signature

June 23, 2009
Date

Executive Policy Review Committee (EPRC) Approval to Proceed:

/s/ Carol Simpson
Responsible Oversight Executive Signature

September 29, 2009
Date

Presidential Approval:

/s/ John R. Broderick
President

September 30, 2009
Date

Policy Revision Dates: December 1, 1988; August 12, 1999; August 1, 2003; November 1, 2004; September 2, 2008; September 30, 2009

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