The purpose of the USF Student Records Management Manual is to inform University faculty and staff of the responsibilities in the access, use, release, security, retention and disposal of student records information. There are myriad laws and rules that govern student records management, and this manual attempts to provide the most critical information in both primary source and summary forms.

This edition of the manual is presented to ensure that administrative and academic units are informed of 1) the need to comply with retention periods and destruction procedures detailed in the General Records Schedule GS5 for Universities; 2) the guidelines on disposal of student records information; 3) the USF Student Records policy and recommended security practices.

We hope to improve the usefulness of this manual in the future. Please help us by sharing your responses to this edition. You may use the Feedback Form provided in the Forms section or by e-mail. If you leave your current position, please pass this manual on to your successor.

Whenever you have questions or need clarification about any topic related to student records, please feel free to contact the Office of the Registrar.
Student Records at University of South Florida

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Section I. Introduction to Student Records

What is a Student? and What are Student Records?

A student is an individual who is registered for a university credit course or program.

A student record, also known as an education record, contains information directly related to a student, which means that the record is personally identifiable. Personal identifiers that relate a record to a student include student name, student ID/social security number, student address, parent/family member names, and a list of personal characteristics.

Student/education records are maintained in multiple media including handwriting, print, microfilm/fiche, computer’s main memory, magnetic tape, cassette, disk or diskette.

Student/education records may be presented by the student, submitted on behalf of the student, or created by the University. These records are used to assist offices in their support of basic institutional objectives and to document student progress and achievement in the educational process of the University.

The majority of USF student/education records fall into twelve categories:

⇒ Admissions Records*
⇒ Cumulative Academic Records
⇒ Financial Aid Records
⇒ Student Employment Records***
⇒ College/Academic Advising Records
⇒ Financial Records
⇒ Disciplinary Records
⇒ Medical Records**
⇒ Psychological\Personal/Career Counseling Records**
⇒ Cooperative Education & Placement Records
⇒ M.D. Program Student Records
⇒ New College Student Records (prior to Fall 2001 and creation of New College of Florida University)

*Admissions records become part of the student’s cumulative academic record once the student is enrolled in classes.
** Excludes records maintained for providing treatment to the student.
*** Excludes records of University employment that have no relationship to student status.

These records with their locations and custodians are listed in the section, “Where are USF Student Records?” While almost all student records maintained by the University are considered to be educational records, those listed below are specifically excluded.

♦ Memory aid records in sole possession of the maker that are not accessible to or shared with anyone else;
♦ University Police records maintained solely for law enforcement purposes;
♦ University employment records if employment is not dependent on student and does not result in academic credit or a grade;
♦ Records created by a physician; psychologist or similar paraprofessional to be used only for providing treatment to a student;
♦ Alumni records if they contain only information related to an individual after the individual is no longer a student.
Where Are USF Student Records?
And
Who are USF Student Records Custodians?

University of South Florida’s student records are listed below by category, with location and custodian.

<table>
<thead>
<tr>
<th>Student Record</th>
<th>Custodian / Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Undergraduate Admissions</td>
<td>Director of Admissions, SVC 1036</td>
</tr>
<tr>
<td>Graduate Admissions</td>
<td>Director of Graduate Admissions, FAO 174</td>
</tr>
<tr>
<td>International Student Admissions</td>
<td>Associate Director for International Admissions, CPR 470</td>
</tr>
<tr>
<td>College of Medicine Admissions</td>
<td>Director of Medical Admissions, MDC 1012</td>
</tr>
<tr>
<td>College of Medicine Cumulative Academic Records</td>
<td>College of Medicine Dean, MDC 1100</td>
</tr>
<tr>
<td>Cumulative Academic Records</td>
<td>University Registrar, SVC 1034</td>
</tr>
<tr>
<td>--- (includes undergraduate, graduate and international student records)</td>
<td></td>
</tr>
<tr>
<td>College Academic Advising Records</td>
<td>Academic Advising Program Director, SVC 2011</td>
</tr>
<tr>
<td>Financial Aid Records</td>
<td>Financial Aid Director, SVC 1102</td>
</tr>
<tr>
<td>Other Student Financial Records</td>
<td>University Controller, Purchasing and Financial Services, ADM 131</td>
</tr>
<tr>
<td>Student Medical Records</td>
<td>Director of Student Health Services, SHS 1000</td>
</tr>
<tr>
<td>Student Psychological / Personal Counseling Records</td>
<td>Director of Counseling Center for Human Development, SVC 2124</td>
</tr>
<tr>
<td>Cooperative Education and Placement Records</td>
<td>Career Center Director, SVC 2088</td>
</tr>
<tr>
<td>Student Employment Records</td>
<td>Director of Human Resources, SVC 2172</td>
</tr>
<tr>
<td>Student Disciplinary Records</td>
<td>Associate Dean, Student Judicial Services, RAR 234</td>
</tr>
</tbody>
</table>
What is FERPA?

FERPA is the acronym for the Family Educational Rights and Privacy Act of 1974, as amended. FERPA is also known as the “Buckley Amendment.” The American Association of Collegiate Registrars and Admissions Officers (AACRAO) summarize the purpose of FERPA in the AACRAO Guide for Postsecondary Institutions for Implementation of the Family Educational Rights and Privacy Act of 1974 as Amended (1995). It states:

The purpose of the Family Educational Rights and Privacy Act is to afford certain rights to students concerning their educational records. The primary rights afforded are the right to inspect and review the educational records, the right to seek to have the records amended and the right to have some control over the disclosure of information from the records.

Educational institutions and agencies are required to conform to fair information practices. This means that persons who are subjects of data systems (i.e., students at an institution) must:

- be informed of the existence of such systems,
- have identified for them what data about them are on record,
- be given assurances that such data are used only for intended purposes,
- be given the opportunity to request an amendment or correction to their record and,
- be certain that those responsible for data systems take reasonable precautions to prevent misuse of the data.

Although the Act does not require it, those responsible for data systems are obliged to consider properly disposing of, or destroying, information when the conditions under which that information was collected no longer exists and there are no legal restrictions preventing such disposal.

Responsibility for administering the Act has been assigned to the Family Policy Compliance Office within the Department of Education. This office reviews and investigates complaints and attempts to bring about compliance through voluntary means. The penalty for noncompliance with Federal regulations can be withdrawal of Department of Education funds from the institution, but action to terminate funding generally will be taken only if compliance cannot be secured by voluntary means.

Student records provisions of FERPA (20 U.S.C. §1232g), are further amplified by state statute (Section 1002.22), Board of Education Rule (6C-6.015) and the USF Rules (6C4-2.0021, FAC).

The Essence of FERPA

FERPA deals specifically with the education records of students, affording them certain rights with respect to those records. For purposes of definition: education records are those records which are (1) directly related to a student and (2) maintained by an institution or a party acting for the institution.

FERPA gives students who reach the age of 18 or who attend a postsecondary institution the right to inspect and review their own education records. Furthermore, students have other rights including
the right to request amendment of records and to have some control over the disclosure of personally identifiable information from these records. Institutions may grant a student more rights than those guaranteed in the Act.

FERPA applies to all schools that receive funding under most programs administered by the Secretary of Education. Most postsecondary institutions, both public and private, generally receive such funding and must, therefore, comply with FERPA. Students have the right to report any violation of FERPA to The Family Policy Compliance Office, U.S. Department of Education, 600 Independence Avenue, SW, Washington, DC, 20202-4605, (203) 260-3887, FAX (202) 260-9001.

Institutions must annually notify students currently in attendance of their rights by any means that are reasonable, such as publication of a notice in the student handbook, catalog, or student newspaper. The regulations do not specify the means to be used. Schools are not required by FERPA to notify former students of their FERPA rights.

Institutions may not disclose information contained in education records without the student’s written consent except under conditions specified in the Act. An institution is not required to disclose information from a student’s records to the parents of dependent students but may exercise its discretion to do so. It is the responsibility of an institution to ensure that information is not improperly disclosed to the parents of students.

To Whose Records Does the Act Apply?

FERPA applies to the education records of persons who are or have been in attendance in postsecondary institutions, including students in cooperative and correspondence study programs.

Conflict with State Law

It should be noted that FERPA may be more permissive than the privacy and public information laws of some states. FERPA should not be interpreted to reduce the stringency of such State laws. They counsel common sense, good judgment, perspective, and integrity for compliance by postsecondary institutions in the implementation of the Act.

In order to comply with all provisions of FERPA, including its regulations and disclosure provisions, an institution must take three basic steps:

1. Have a written institutional policy and procedures on how the institution complies with FERPA;
2. Must notify students of their privacy rights under FERPA. Two types of notification must be given:
   (1) annual notification to current students of their rights and
   (2) public disclosure of the institution’s categories of personally identifiable information the institution has designated as “Directory Information.”
3. Provide students access to review and request an amendment to their records.
Policy and Procedures for Compliance with FERPA

This document in its entirety constitutes University of South Florida’s commitment to compliance with FERPA. This document is University of South Florida’s written institutional policy in regards to FERPA. The Office of the Registrar is responsible for insuring the confidentiality of all student records and has been designated by the University of South Florida as the Official Student Records Custodian. The Compliance Officer for University of South Florida is the University Registrar and all issues and questions regarding FERPA compliance should be directed to him/her. Formal compliance failure complaints should be directed to: The Family Policy Compliance Office, U.S. Department of Education, 600 Independence Avenue, SW, Washington, DC, 20202-4605, (203) 260-3887, FAX (202) 260-9001.

Student Notification of their Rights

The University of South Florida will notify students annually through the publication of their rights in the Graduate and Undergraduate Catalogs, Student Handbook, New Student Orientation Manual, and Schedule of Classes. This publication will contain the University’s Definition of Directory Information, policy and procedures for Request to Prevent Disclosure of Directory Information, policy and procedures for Student Inspection of Records and the policy and procedures to Request an Amendment to Student Records.

Policy and Procedures for Student Inspection of Her/His Record

Policy

University of South Florida will provide services to students and former students to inspect and review their own student record upon request. This service will provide copies of records and an interpretation and explanation of the record, if requested. Limitations on this service are as follows. University of South Florida will not allow students to inspect or review:

- financial information submitted by parents;
- confidential letters and statements of recommendation to which the student has waived his or her right to inspect and review and that are related to her/his admission, application for employment or job placement, or receipt of honors;
- Educational records that contain information about more than one student. However, in such cases the institution will permit access to that part of the record which pertains only to the inquiring student.

University of South Florida does not require students to waive any of their rights to review any part of their student record. If, however, a student should waive any or part of her/his rights to review confidential letters and statements of recommendation under FERPA, the right of waiver will be subject to the following conditions:

- waivers shall not be required at this institution;
- no service or benefit will be denied students who do not supply waivers;
that the document(s) to which the student has waived the right to review is(are) used only for the purposes for which it was originally collected;

♦ that all waivers for right to review be in writing and signed by the student.

The student may later revoke the waiver but they will not have access to those documents that were collected when the waiver was in force.

The University of South Florida shall comply with the requirements for retention and destruction as set forth by the State of Florida, General Records Schedule for Universities and Community Colleges (Schedule GS5). However, if a student has requested access to their student records, the request of the student shall supersede the records retention schedule and they will not be destroyed until the conflict/request is resolved/fulfilled.

**Procedure**

In order to review his/her education record, he/she must go to the Office of the Registrar and fill out a Student Request to Inspect and Review Education Records Form. A review date will be scheduled (FERPA requires the review to be within a maximum of 45 days of the date of the student’s request) within 5 working days of receipt of the signed request, except for the first two weeks of a semester when it will be within 10 working days. On the Scheduled Review Date the student must bring a photo identification card before the review will be allowed.

**Policy and Procedures for Student Request for Amendment of His/Her Record**

**Policy**

University of South Florida shall provide all students the opportunity to challenge the contents of their educational records they feel to be inaccurate, misleading, or otherwise in violation of their privacy or other rights. Each request shall be examined by the custodian of the record(s) involved and the student shall be informed within 30 days of his/her request of the decision. If the decision is in agreement with the student’s request, the appropriate record(s) shall be amended and the student notified in writing. If the decision is not in agreement with the student’s request, the student will be notified of the decision and will be informed of her/his right to a formal hearing on the matter.

If a request for a formal hearing is received, the student will be informed of the time, date and place of the hearing at least 5 working days before the hearing. The Student Records Hearing Committee will consist of at least three university officials with no interest in the outcome of the hearing. Students will be afforded ample opportunity to present their arguments and evidence of their claim. The student will be allowed to be assisted and/or represented by anyone they deem necessary to explain and defend their claim. If the student wishes to be represented by an attorney, she/he may do so at her/his own expense. The decisions of the hearings will be in writing and based solely on the evidence presented at the hearing. It will contain a summary of the evidence, the reasons for the decision and will be sent to all individuals with a legitimate educational interest.

If the decision is favorable to the student, he/she will be notified of the amendment of the record in writing. Correction and/or amendment of the record will be processed within 10 working days of
the decision of the hearing committee. All University offices and individuals with a legitimate educational interest in the decision will also be informed in writing.

If the decision is not favorable to the student, she/he will be notified of such in writing, citing the reasons for the decision. This notification will also include the following statement:

“You have the right to place a statement in your educational record explaining your reasons for disagreeing with the decision of the Student Records Hearing Committee. This statement will be maintained in your student record for as long as your record is held by University of South Florida. The statement will also be disclosed to any authorized party requesting to review your record.”

All University offices and individuals with a legitimate educational interest in the decision will also be informed in writing of the decision.

**Procedure**

Students requesting an amendment/correction to their student (educational) record should go to the Office of the Registrar and fill out a Request for Amendment/Correction of Education Records Form. Any supplemental evidence to support the request should be attached. The Records Custodian shall research the request and notify the student in writing within 30 days of the decision.

Students requesting a formal hearing for amendment/correction to their student (educational) records should go to the Office of the Registrar and fill out a Student Request for Formal Hearing Form. A Hearing Committee will be formed and the student notified in writing of the members of the committee, the place, date, and time of the hearing. This notification will be made at least five days before the hearing convenes.

**Statement of Confidentiality**

University of South Florida is committed to safeguarding student (education) records. This institution shall not release personally identifiable information to a third party without the written consent of the student. The written consent must specify the records to be released, the purpose of the disclosure, identify the party or class of parties to whom disclosure may be made, and must contain the student’s signature and date. University of South Florida will release information designated as “Directory Information” and student record information to the following:

- Authorized representatives of State or Federal supported programs for evaluation and audit;
- State and Local officials to whom disclosure is specifically required by State Statute;
- Veterans Administration officials for students receiving educational assistance;
- Accreditation agencies carrying out their accrediting functions;
- University of South Florida officials who have a legitimate educational interest;
- Organizations providing financial aid to the student;
- Organizations conducting studies for education agencies or institutions to develop, validate, and administer predictive tests, to administer student aid programs, or to improve instruction;
♦ Parents of a student who have established that student’s status as a dependent according to Internal Revenue Code of 1954, Section152;
♦ Persons in compliance with a judicial order or a lawfully issued subpoena;
♦ To persons in an emergency, if the knowledge of information, in fact, is necessary to protect the health or safety of students or other persons;
♦ To an alleged victim of crime of violence, any results of any institutional disciplinary proceedings against the alleged perpetrator of that crime with respect to that crime;
What is Directory Information?

The following types of data are considered Directory Information:

- Student’s full name
- Student’s local and permanent address
- Student’s local and permanent telephone number
- Date and place of birth
- Student’s classification
- Major field of study
- Dates of attendance
- Degrees and awards received
- Full and part-time enrollment status
- Most recent previous educational agency/institution attended before USF
- Standing at most recent educational agency/institution attended before USF
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Photographic image
- Other similar information*

* While other similar information can be considered directory information, the Office of the Registrar has not designated other data elements as such pursuant to the requirements of FERPA. Therefore, all other student data is considered to be protected.

USF publishes the University of South Florida Directory each year as part of its normal business. Student listings in the Directory include name, permanent and local addresses, telephone numbers, classification and major field of study. The Directory and other listings of directory information are circulated in the course of University business and therefore, are accessible to the public, as well as to students, faculty and staff.

University auxiliaries and non-affiliated university organizations may request directory information from the Office of the Registrar. As the designated data custodian of student information for the University, the Office of the Registrar is the only unit authorized to release directory information to third parties. Third parties may only request information on student sub-populations based on these elements and these are the only data elements that may be provided. Third party data requests must be submitted in writing and requests are tracked; the Office of the Registrar retains to the right of refusal to provide the information in an electronic format.

All data requests released to third parties include the following responsibility statement:

This information is being provided to you for the one-time requested purpose only. Fulfillment of your request does not constitute endorsement of your organization, product or service. Any false claim (expressed or implied) concerning the University of South Florida is expressly forbidden. Misrepresentation of the University with your organization, product or service (e.g. improper use of the University of South Florida name, seal or logo) will result in the denial of future requests for student information and possible legal action.

Please be advised that the University of South Florida Office of the Registrar declines to release or sell to the public any student information, student lists, mailing labels or other education record that is not deemed ‘Directory Information’. Charges associated with the attached file are
to defray production costs involved in its creation. If an explanation of why the list is not a public record is required, refer to the following: USF student information is exempt from the requirements of the Florida Public Records law pursuant to the Family Educational Rights and Privacy Act and Florida Statute sections 228.093 and 240.237. If this information is inappropriately released to any other party, future requests for directory information will not be fulfilled.
When is Directory Information Confidential?

FERPA, state statute, the Department of Education and USF rules, give a student the right to refuse to permit the University to publish or disclose items of Directory Information pertaining to them. Once a student requests non-disclosure of directory information, the student is said to be “on privacy”. His/her directory information is considered to be confidential and is released only under three circumstances:

- With the student’s written consent;
- Under the eleven circumstances specified in the section “Statement of Confidentiality”;
- Or
- In the event of a health or safety emergency.

When the record of a student on privacy is accessed in the student information system (BANNER), a special notation appears to remind the employee that the student’s directory information is to be withheld. In addition to this system reminder, these students are programmatically excluded from any third party data file generated by the Office of the Registrar in response to a request for directory information.

A student may opt to place his/her records “on privacy” by logging into a secure website and reviewing his/her record. Information regarding University policy on the release of directory information and options for selecting privacy are available at: The University’s policy on releasing directory information and the [https://www.registrar.usf.edu/privacy/](https://www.registrar.usf.edu/privacy/)

A student may also submit a written request; a special form is available for this purpose and may be downloaded at: [http://www.registrar.usf.edu/index.php](http://www.registrar.usf.edu/index.php) under “Registrar’s Office Forms”.

To be excluded from the annual printed USF Directory, a student must submit his/her request for “Privacy” to the Office of the Registrar on the Tampa campus by the end of the second week of classes in the Fall Semester. No public disclosures will be made until after this deadline. The Office of the Registrar accepts privacy requests throughout the year but assumes no responsibility for disclosures made prior to receipt of the request.

Privacy requests will become effective within 48 hours of receipt by the USF Registrar’s Office (Tampa) and will remain in effect until a student has been awarded a degree from USF or until a student has not been enrolled at USF for three consecutive semesters or a student has provided authorization to the Office of the Registrar requesting removal.

* While other similar information can be considered directory information, the Office of the Registrar has not designated other data elements as such pursuant to the requirements of FERPA. Therefore, *all other student data is considered to be protected.*
What is a Release Authority?

Authority to release confidential student records information is generally based on the prior consent of the student.

The student’s release authority must be in writing and specify:

- The information to be disclosed,
- To whom the disclosure may be made, and
- The date of the consent.

The release authority must be signed by the student and include at least one other item of student information to insure proper identification of the student record to be released. In addition to name, student identification number, date of birth, dates of attendance, degree and date awarded are among the other acceptable items of student information.
Use of Social Security Numbers

A primary emphasis of the University’s Student Records Policy is to protect the privacy of personal information, particularly the privacy of student Social Security Number (SSN). Accordingly, the University of South Florida no longer uses or permits the use of Social Security Number as the primary numerical identifier in the USF Student Information System. Rather to protect the identity of students against unauthorized use, inspection, or tampering, prospective and current students are assigned a USF Identifier (USFID).

Collection of Social Security Number
While legislation restricts collection of Social Security Numbers by certain agencies, it also creates exemptions for agencies like the University of South Florida that are authorized by law to collect social security numbers. Under federal law, institutions using social security numbers that have operated a system of records prior to 1975 may continue its use. Additionally, the collection of social security numbers is imperative for the performance of USF’s duties and responsibilities prescribed by law. The public school system of Florida uses SSN for federal and state reporting and as a student identifier in the K-20 system for purposes of tracking and assisting students as they move from one education level to the next. Records guidelines and practices require that social security number and name changes be recorded and tracked, upon receipt of legal documentation or appropriate certification. State laws and regulations require release of personally identifiable student data to appropriate state agencies to facilitate state research and reporting. The Federal Department of Education and the State of Florida Office of Student Financial Assistance require the use of social security numbers for the administration of all Federal and State financial aid programs, reports, and processes. The Office of Financial Aid is required to collect and verify that the SSN submitted by the student on his/her application for financial aid agrees with the number on file with the Social Security Administration. Because these and other essential functions mandate the use of social security number, the University of South Florida will continue to collect the numbers from entering students.

Disclosure of Social Security Number
A student’s social security number cannot be identified as directory information. All SSNs are protected by federal law (FERPA) and are not released to unauthorized parties. Therefore, the University of South Florida does not release social security numbers in response to public records requests because the numbers are exempt from disclosure under the State’s public records law. As a general rule, only a limited number of University officials with a “legitimate educational interest” or offices that manage/maintain student record information will have access to student social security numbers. University policies have been established to ensure that the social security number is not used for anything other than the stated purpose. The policies are regularly reviewed to ensure compliance with applicable laws.
USF Identifier (USFID)

Protecting the privacy of personal information is an important priority at the University of South Florida. Therefore, a protocol that minimizes the use of social security number for identification purposes has been established to further protect the privacy of USF students. A USFID is assigned to prospective and current students and should be used for academic, business and administrative transactions requiring an ID.

The USFID is a randomly generated number assigned within the University’s Student Information System (OASIS). It is not derived from any personally identifiable student information. The format of the USFID is ‘U-------’, followed by an eight-digit number. USFID numbers are issued only once and remain the student’s official primary identifier with the University. This number will be permanently and uniquely recognized by OASIS throughout the student’s academic career in USF undergraduate, graduate, and professional programs. The USFID will be considered the property of the University of South Florida. Its use and governance shall be at the discretion of the University, within the constraints of the law.

General Guidelines Concerning Use of Student Identifiers

Student Social Security Number and institutionally assigned identification numbers like the USFID are considered personally identifiable information under FERPA—i.e. specific information that would make a student’s identity easily traceable. Therefore, the University is prohibited from releasing, transferring, or otherwise communicating the SSN or the USFID in the student education record to any party not having a legitimate educational interest in the numbers. As a result,

1. Social Security Numbers will be electronically transmitted only through encrypted means.
2. Academic and other forms of personal information will not be publicly posted or displayed where either the SSN or the USFID identifies the individual associated with the information.
3. Paper and electronic files containing student identifiers will be disposed in a secure fashion.
4. All University forms and documents will indicate when social security number is legally required. Otherwise, all other forms and documents will request USFID.
5. Individuals will not be required to supply their Social Security Number either verbally or in writing at any point of service, nor will they be denied access to services should they refuse to provide their SSN except in those instances where the University is legally required or authorized to collect Social Security Number—in which case, this should be made known to the individual immediately.
Section II.  Responsibility for Student Records

Job Related Access to and Use of Student Record Information
“Need To Know”

FERPA (20 U.S.C. §1232g), Florida State Statutes (Section 1002.22), Board of Education Rules (6C-6.015) and University of South Florida Rules (6C4-2.0021), permit University officials to access and use student records for legitimate educational purposes.

A “University Official” is defined as:

A person employed by USF in any faculty/staff position or as a temporary substitute for a faculty or staff member,
A person currently serving as a member of the Board of Education, or
A person employed by or under contract to the Board of Education to perform a special administrative task for USF (such as an audit).

“Legitimate educational purpose” is defined as a University official’s need to know in order to:

Perform an administrative task specified in the official’s position description,
Perform a supervisory or instructional task directly related to a student’s education, or
Perform a service or benefit for the student (such as health care, counseling, student financial aid, student job placement, etc.).

Accessing or using student information for other than legitimate educational purposes is strictly prohibited.
Sample Employee Code of Responsibility
for
Student Records Information

1. Information provided to you to conduct official University business may not be used for other purposes, or be passed on by you to any other user.

2. You are responsible for the security of all data to which you have access. This may involve establishing policies/procedures regarding access security to computerized files, keeping disks or printouts in locked cabinets, periodically updating passwords, and ensuring that terminals are properly signed off when not in use.

3. You are responsible for distinguishing between public, directory, and confidential information. For guidance read sections on “Student Records Policy” and “Release of Student Information” in the Student Records Manual. Confidential information regarding students or staff may not be released in any personally identifiable format without permission of the individual. If you are in doubt, refer the individual you are trying to help to the office responsible for maintaining the information requested. Individual directory information may be released unless a student has requested otherwise. Always check the “Privacy Flag” in the student’s files before releasing directory information. Any public information may be displayed in either individual or aggregated format.

4. For consistency, official university counts of students, employees and other items are developed and maintained by the Office of Institutional Research, Planning and Evaluation. It is your responsibility to use these official counts on all surveys, news release, grant proposals or other documents. Having access to University files should not result in the use of alternate counts.

CONFIDENTIALITY OF STUDENT RECORDS AGREEMENT

In compliance with the guidelines incorporated in the Family Educational Rights and Privacy Act (Buckley Amendment) and the University of South Florida’s Student Records Policy, I will take every precaution to protect the integrity of our student records.

As an employee of the ________________ Office, University of South Florida, I am aware that any release of academic information which would identify a specific student is prohibited unless we have a written release from that student. I am also aware that confidentiality of student records is required by Federal Law.

I have read the above and the University’s Student Records Policy and agree to comply with all regulations both on and off campus.

_________________________             ___________
Signature           Date
Sample Volunteer Code of Responsibility
for
Student Records Information

1. Information provided to you to conduct official University business may not be used for other purposes, or be passed on by you to any other user.

2. You are responsible for the security of all data to which you have access. This may involve establishing policies/procedures regarding access security to computerized files, keeping disks or printouts in locked cabinets, periodically updating passwords, and ensuring that terminals are properly signed off when not in use.

3. You are responsible for distinguishing between public, directory, and confidential information. For guidance read sections on “Student Records Policy” and “Release of Student Information” in the Student Records Manual. Confidential information regarding students or staff may not be released in any personally identifiable format without permission of the individual. If you are in doubt, refer the individual you are trying to help to the office responsible for maintaining the information requested. Individual directory information may be released unless a student has requested otherwise. Always check the “Privacy Flag” in the student’s files before releasing directory information. Any public information may be displayed in either individual or aggregated format.

4. For consistency, official university counts of students, employees and other items are developed and maintained by the Office of Institutional Research, Planning and Evaluation. It is your responsibility to use these official counts on all surveys, news release, grant proposals or other documents. Having access to University files should not result in the use of alternate counts.

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I have read the above and the University’s Student Records Policy and agree to comply with all regulations both on and off campus.

___________________________________   ___________
Signature           Date
Section III. Physical Security of Student Records

Physical Security Guidelines

✓ All employees regardless of level sign both an Employee Code of Responsibility for Student Records Information and a Statement of Confidentiality of Student Records.
✓ All student records are maintained in a secure environment.
✓ No documents or reports containing protected student information are ever left on reception desks/counters or in other areas open to view and/or access by students and visitors.
✓ All student records are removed and/or secured before leaving an unsecured work area.
✓ All computer monitors are positioned so that a student’s electronic record cannot be viewed by other students or unauthorized persons.
✓ No students or student workers have authorized access to completed Grade Rosters or Grade Change Forms prior to receipt by the Office of the Registrar.
✓ All Grade Rosters, Grade Change Forms and graduation certification forms are carefully reviewed.
✓ No student is authorized to hand-carry or deliver signed Academic Regulations Committee Petition Forms, Grade Rosters, Grade Change Forms, or other similar documents detailing significant updates to the student’s own record.
✓ The list of employees assigned access codes to unlock and enter the Student Records Vault (SVC1027) is maintained by the Associate University Registrar of Operations for the Office of the Registrar, access by code is monitored by date and time by Physical Plant, and access codes of employees upon termination or transfer are revoked by deletion.
✓ All irregularities or missing student records documents are reported immediately to the Office of the Registrar.

Office of the Registrar

✓ No student workers to participate in grade processing, grade change processing, and degree posting processing.
✓ University seal and validation equipment when unattended.
✓ All diplomas, transcript paper, and change of grade forms in a secured area.
✓ Semesterly updated academic transcripts on all student employees available for review for unauthorized student record changes.

Touchpad and Security Codes

✓ The inner office(s) have been deemed a secure area with admittance granted only to those individuals with a need for access. Access is controlled by an electronic lock that allows only those individuals with the security code to enter. The access security code is changed every 180 days.
✓ The Office of the Registrar is protected during the hours of non-operation by an electronic alarm system. This system, when activated, alerts the University Police when an intruder is in this secure area. Access to this system is limited to a minimal number of Registrar’s office staff. The access security code is changed every 180 days.
Records Retention Guidelines

Student records custodians and managers of academic and administrative units are responsible for complying with records retention periods and destruction procedures. Requirements for retention and destruction are detailed in the General Records Schedule GS5 for University/Community College Records issued by the Florida Division of Library and Information Services (March 1996). This document lists the student records schedule by series/types and designates the minimum period for retention. When student records have met retention requirements established by one of these records schedules, a Records Destruction Request Form, LS5E107, signed by the records custodian may be submitted to initiate disposal. The completed forms should be sent to the Director of Purchasing, ADM 185l, who after local authorization will forward it to the Florida Division of Library and Information Services for state approval. The request must be submitted and approved before actual destruction is carried out. When records are destroyed, notations must be made in the disposal certificate section of the pre-approved Records Destruction Request. After the disposal certificate section is completed, the form must be retained permanently by the records custodian for future reference.

A complete copy of the March 1996 General Records Schedule GS5 for University/Community College Records and the Records Destruction Request Form LS5E107 can be found in the appendix of this document. Questions regarding the disposal of student records should be directed to the designated records custodian. Information about the physical disposal/destruction of student records and information is found in the section, “Destruction Disposal Guidelines.”

Destruction/Disposal Guidelines

The disposal of Student Records must occur in accord with retention schedules, after destruction approval is granted and then in a secure manner. Any document (paper, form, microfilm, report, etc.) that contains personally identifiable student information, even if it is not considered to be an official student record, cannot simply be placed in the trash. Such documents include but are not limited to computer-generated reports/lists, microfilm/fiche, notes, letters/memos, and forms.

There are three basic ways to dispose of paper documents that contain personally identifiable information. The appropriate method should be chosen for each office based on the volume of materials and the availability of shredders or recycling bins.

Shredding – any document with personally identifiable information can be shredded and then placed either in a recycle bin or in the trash.

Sensitive Material Recycling - locked recycling bins designated for confidential materials if they are available.

Burning – any document with personally identifiable information can be burned.
Visitor Guidelines

With the exception of a select group of pre-identified University personnel, (staff from the Admissions Office, Adult and Transfer Services, and University Administrators), persons who are not employees or pre-authorized volunteer workers in the Office of the Registrar are to be considered visitors for purpose of entry to the Student Records Vault or Student Records Processing areas.

Visitors, including vendors and non-university maintenance/construction personnel, are never to be left unattended in areas where there is access to student records/data.

All employees of the Office of the Registrar are responsible for questioning the presence of any unknown/unidentified person(s) in these areas.
Section IV. Electronic Information Security of Student Records

Introduction

Banner is the name of the integrated software licensed from the SCT Corporation for University of South Florida’s Student Information System.

Banner’s hierarchy is ordered by instance, system, module and forms within modules to accommodate different functional area processes. USF’s Alumni Association operates in an instance separate from student records. USF’s Production instance uses the Financial Aid system, the General system and the Student system. The General system ties the other functional systems together. A student’s ID number, name, address, etc. is contained within the General system and is shared by the others. USF also maintains a Pre-Production instance of Banner for system testing purposes.

Banner modules are a collection of forms with embedded instructions used to enter, modify, delete and query data. Banner simply provides the screens and programs necessary to manipulate data. The data are stored in tables residing in an Oracle database. Oracle is a relational database, which means that tables are linked together by means of internal identification numbers and therefore data redundancy is limited. One table might have a student’s ID number and the course numbers in which he/she is enrolled. A separate table has the course numbers and the course descriptions. The course numbers link the two tables together providing the course description for the courses in which a student is enrolled. Over 1,200 tables exist in the Banner system.

Data Integrity

These guidelines establish a Policy of Responsible Computing for the protection, access, and use of University of South Florida’s student information system. They define the responsibilities of everyone accessing and managing the data. Offices may have individual guidelines that supplement, but do not supplant or contradict this policy. Data entrusted to the University by other organizations (e.g., foundations and governmental agencies) are governed by terms and conditions agreed upon with those organizations. Specific issues not governed by such agreed terms shall be governed by the guidelines set forth in this document.

These guidelines ensure database integrity and the goal of facilitating secure, quick, professional, cost-effective communication for the USF community by:

- avoiding creation of duplicate records for a single entity,
- providing complete name/address information in a timely manner, with an audit trail of changes,
- using standard entry to facilitate consistent reports and searches,
- sharing effective processing discoveries and problem-resolution tasks with other users,
- using USPS approved address setup deferring to database capability.
Administrative Responsibility

In accordance with the Family Education Rights and Privacy Act, 1974, as amended, and to ensure maximum safeguards against indiscriminate distribution of information contained in students’ personal academic records at University of South Florida, only authorized University personnel will disclose information of a confidential nature (i.e., information not normally available to the general public). Information may only be released to the students themselves, to a parent/guardian claiming that student as a dependent (as demonstrated through provision of a copy of the parent/guardian's most recent federal income tax return), or to a third party upon receipt of an original written release signed by the student concerned.

Certain exceptions to this includes authorized University personnel acting within the student's legitimate interest; organizations conducting studies for educational and governmental agencies; accrediting agencies; appropriate persons in case of health or safety emergencies; agencies or offices in connection with the student's applications for receipt of financial aid; governmental officials as identified by public laws; and an appropriate official in response to a court order or subpoena. Without a signed release, the University can make only "directory information" available for public use in campus directories, publicity of events, honors, and the like.

Electronic data are a vital asset owned by the University. All institutional data, whether maintained in the central database or copied into other data systems including microcomputers, remain the property of University of South Florida. Access to data is not approved for use outside an individual’s official University responsibility. Computerized, institutional data shall be used only as required in the performance of legitimate University of South Florida business.

Supervising administrators shall ensure a secure office environment with regard to the student information system. Administrators shall validate the access requirements of their staff according to job performance before submitting requests for the provision of access. Under no circumstances shall anyone use institutional electronic data (in detail or summary) in any publication, seminar or professional presentation, or otherwise release data in any form outside the University without prior written approval from the appropriate data custodian. Data shall never be left on any system to which access is not controlled. Although the University must protect the security and confidentiality of data, the procedures to allow access to data must not unduly interfere with the efficient conduct of University business.

All who use institutional data have the right to expect the data to be accurate.

Access to Official University Records

The following outlines the requirements and limitations for University offices to observe before submitting requests for the provision of access for inquiry and update capability to the University’s official records. All employees shall be held accountable for data security.

Access will be awarded only after appropriate tailored training is received. Entries to Banner’s General system (person or non-person) tables affect the overall integrity of the database used throughout Banner systems and modules. Failure to abide by the following outline for creating and maintaining general entity records will result in removal of access.
Employees are not to loan or share their passwords with anyone. If it is found that passwords are being loaned or shared, employees who are assigned access to records are subject to disciplinary action.

Offices should take steps to ensure that an alternate person is assigned as backup for each office function, and that this individual has access to the system functions required to provide backup support. Every office will maintain a current list of preliminary and secondary users for the various module functions.

Offices may submit requests for the provision of access for an employee by completing and submitting a Request for OASIS Access Form (see Appendix 4) to the appropriate data custodian. The data custodian will review and approve or deny the request. Before access is granted, the data custodian must be formally notified the appropriate tailored training has occurred. If a request is questioned or denied, the requesting department/division will be contacted by the data custodian. Under no circumstances will requests for the provision of access be granted prior to receipt of signature approval of the department/division head and the data custodian.

Update access provides both inquiry and update capability. Update capability is generally limited to the offices directly responsible for the collection and management of the data. Update access is available to administrators and users who have an authorized need to change institutional data in the routine performance of their job duties.

Each user is assigned the appropriate combination of inquiry-only and update access to specific parts of the student information system based on job related “need to know” access. The types of access are determined by each module’s data custodian.

Data Custodians

A data custodian, usually an administrator of a University office or department, may make data available to others within his or her purview for use and support of the unit’s functions. This access may take any or all of the following forms:

1. The custodian may provide printed or electronic reports containing subsets of the data.
2. The custodian may grant access to view subsets of the data online.
3. The custodian may grant access to alter subsets of the data in predefined ways.
4. The custodian may grant access to query and tabulate subsets of the data to produce reports approved by the custodian of the data.

Before granting access to data, the data custodian shall be satisfied the protection requirements have been implemented and a “need to know” is clearly demonstrated. By approving end-user access to institutional data, the data custodian consents to the use of these data within the normal business functions of administrative and academic offices. Misuse or inappropriate use by individuals will result in revocation of the user’s access privileges. Query (inquiry) access to student data will be broadly available throughout the institution; however, it is the user’s responsibility to ensure University guidelines are followed regarding “Release of Student Information.” If it has been determined information has been released in violation of this policy, all query system access will be revoked.
The custodians of data are accountable to their immediate supervisors for their decisions to grant or deny access to data. Individuals to whom custodians grant access are accountable to the custodians and to University of South Florida for the use of the data. An individual given access to data resources by a custodian is required to sign a non-disclosure agreement.

Data custodians are also responsible for the accuracy and completeness of the data in their modules. If accuracy and completeness are not possible, they are responsible for documenting the reasons for the inconsistencies.

Data custodians are also responsible for the maintenance and control of the student information system’s validation and rule tables and the validation and approval of software releases affecting their areas of responsibility. These tables and processes define how business is conducted at the University of South Florida.

**Primary Process Owners for the BANNER Modules Listed:**

<table>
<thead>
<tr>
<th>Any Primary Process Owner Listed Below</th>
<th>General Person</th>
</tr>
</thead>
<tbody>
<tr>
<td>University Registrar</td>
<td>General Student, Schedule, Catalog, Web, Grades, Registration, Academic History, &amp; Faculty Load.</td>
</tr>
<tr>
<td>Director of Admissions/Graduate</td>
<td>Admissions, Recruitment, and Articulation</td>
</tr>
<tr>
<td>Director of Financial Aid</td>
<td>Financial Aid &amp; Web Response for Financial Aid</td>
</tr>
<tr>
<td>Director of Purchasing and Financial Services</td>
<td>Accounts Receivable &amp; Web</td>
</tr>
<tr>
<td>Director of Facilities Planning</td>
<td>Location Management</td>
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<tr>
<td>Director of Housing</td>
<td>Housing</td>
</tr>
<tr>
<td>Director of SASS</td>
<td>Degree Audit (CAPP)</td>
</tr>
<tr>
<td>Asst. VP, Advancement Services</td>
<td>Constituent/Organizations, USF Foundation</td>
</tr>
<tr>
<td></td>
<td>Finance, Prospect (University Advancement)</td>
</tr>
<tr>
<td>Assoc Director, USF Research Foundation</td>
<td>Finance General (USF Research Foundation)</td>
</tr>
</tbody>
</table>

**Student Information System’s Validation and Rules Tables and Software Release Maintenance Process**

University of South Florida’s data custodians are responsible for the maintenance and control of the student information system’s validation and rules tables, and validation and approval of software releases affecting areas of responsibility. The process for all changes to these areas of the student information system is as follows:

1. Complete and sign “OASIS Table Modification Approval Form”
2. Route the form to all required offices for approval
3. Return the form to the SIS Data Custodian responsible for the OASIS table to be modified
Information Users

Individuals are responsible for understanding all data elements used. If a person does not understand the meaning of a data element, he/she should consult the appropriate data custodian.

Users should exercise care in using the student information system to protect data files from unauthorized use, disclosure, alteration, or destruction. Each user is responsible for all transactions occurring during the use of his/her log-in and password. Student employees and their supervisors are responsible for appropriate assignments of duties to prevent potential abuse for self-gain, i.e. under no circumstances shall an employee modify his/her own student data.

Generally speaking, a student employee should only use the Banner Student System, the accepted employee user interface, for the purposes authorized by their accountable officer—not to make alterations or changes to their own record. OASIS Web is the acceptable method for students to use to access/update their own information. The only other alternative available to a student employee is to have another person with security privileges to process his/her individual transaction. In keeping with best practices, segregation of duties as well as avoidance of incompatible assignment of duties should be practiced. This will prevent the appearance of employee dishonesty on the part of student employees, a reportable offense that could result in loss of system access, suspension, or termination. Student employees like other workers should be advised that there are strict audit trails on all record entries and changes.

Because of the importance of data confidentiality and security, all full-time permanent and temporary employees, as well as student workers must sign an Employee Code of Responsibility for Student Records Information Form before being granted access. All employees who require access to online records will receive a system password defined specifically for the employee. This will allow updates to be tracked to a specific user password and specific person.

Student workers will not be given update capability to validation tables or transactions directly affecting student transcripts or grades. Any exceptions to the above guidelines must be requested and justified in writing and be approved by the appropriate data custodian.
Student Information System Log-On ID’s and Passwords

The log-on ID serves several functions. First, it establishes an account for data changes for an individual. Second, it identifies the access level the individual requires and third it provides the ability to track activity the individual generates.

As such, a log-on ID belongs to a single individual. It is the responsibility of the accountable officer in each department/division to notify the appropriate PPO when the individual leaves the employment of the university or changes positions within the university. Upon such notification, the log-on ID should be discontinued to prevent inappropriate access and data changes.

The log-on ID is the first of two pieces of information required to access the Student Record System. The second piece of required information is the password. It is associated with the log-on ID and cannot be changed by the user. The password serves as the first level of security to assure that only authorized individuals access university information.

The password is entered with the log-one ID to initiate a computer session. The password should never be shared with another individual.

Password changes should be requested every 6 months to one year to protect the employee and the integrity of the data resting in the Student Records System. Password changes should be directed to the Coordinator of Records and Data Control.
**Extracted Data**

*Extracted Data* refers to data that originally resided in the Student Records System and now also resides in a special file. The data has been extracted from the system using a batch program and then is placed in a secured extract file. Access to the extract file is secured in the same manner as the original data and must be specifically requested by and granted to an individual employee. Any rules of good data management that are applied to the original data also apply to the extracted data. Therefore, individuals using extracted data must:

a. Maintain the extracted data in a secure file either in the extract as created or, if downloaded, in a secure PC file;
b. Only use the data for legitimate educational purposes;
c. Abide by security and information release requirements and observe the “Privacy Flag” that is part of the extracted student data; and
d. Never release updated extract data as University data.

In addition to safeguarding the extract file, any individual controlling an extract must be aware of the need to maintain overall data integrity. If updates are made to the extracted file for errors that are found and the original source is not also corrected, the data integrity of Student Records System is jeopardized. The anecdote below provides an example.

A college receives extracted data on its students each term. Students’ local and permanent addresses are part of the data received. The extracted data is downloaded to a PC and the college creates a small data base. At some point, the college mails information to all students in a particular degree program. In response to this mailing, the college learns that a student has moved; therefore, the address on file is no longer accurate. When notified, the college updates the PC data base for future mailings.

Unfortunately, in this example, the original address in the Student Records System remains incorrect. The next time that student’s address information is requested, the wrong one will be re-issued. The college should have updated the student address in the Student Records system to maintain integrity. All users of extracted data must be vigilant in maintaining data integrity.
Student Direct Access

The University of South Florida wishes to provide open access to students, with as few restrictions and regulations as possible. Students are afforded direct access to much of their data stored in the student information system. This access is provided so that students have greater flexibility and control over their interactions with the University.

All direct access afforded to students shall be provided through secure means using the appropriate authentication and encryption mechanisms for the delivery medium. Prior to direct access to student information system students are required to read and acknowledge their acceptance of the following Terms of Usage statement:

Terms of Usage

You are entering a secure information area. Unless otherwise noted, any information you enter or change will be effective immediately. You are responsible for any changes made using your ID.

Your PIN is your "password" to access the system and your records and information. Please do not share your ID or PIN with others. While you have a right to inspect and review your records, other individuals do not without your consent. The State of Florida has felony laws against unauthorized use, including accessing another user's account. Civil penalties can include imprisonment of up to fifteen years and fines. The university may also impose administrative penalties or sanctions against those who are found to have violated the law.

The University of South Florida wishes to provide open access to students, with as few restrictions and regulations. The Office of the Registrar has been delegated the responsibility for assuring that information about students is released only to individuals that have legally authorized access. Therefore to protect the security and confidentiality of your records and information, the Registrar's Office has implemented a security procedure to periodically expire your PIN/password. When this occurs, OASIS will prompt you to declare a new PIN. As a means of further protecting your own records, we recommend that you change your PIN often.

Usage Certification Statement:

For the protection and security of my records as well as those of other students, I WILL NOT:
1. Access another user's account or misrepresent my identity.
2. Allow another person to access my account or share my password.
3. Intentionally disrupt the legitimate use of computing facilities by other people.
Student Security: ID & PIN

Student direct access to records and registration services via Internet and telephone voice response systems requires a nine-digit Student ID (Social Security Number) and a six-digit Personal Identification Number (PIN). The student information system automatically sets all new PIN records to expire ninety (90) days after they are declared. This encourages students to frequently change their PIN to lessen their exposure to someone gaining unauthorized access to their records.

The first time records are accessed through either method, the student is prompted to enter his/her date of birth as well as declare a six-digit PIN of choice. The first time a student accesses their records through the Internet, s/he is also asked to declare a “Security Question” and its answer. This alternate form of authentication can be used if the student has forgotten the numeric PIN.

Five (5) failed attempts to access the same student account will result in the PIN being disabled. When the PIN record is disabled, all future attempts to access the account are denied. The Office of the Registrar re-enables PIN records the next business day. If the student requires access before the PIN is automatically re-enabled, he/she must provide a written request or visit the Office of the Registrar in person and present an acceptable form of picture identification.

When students forget their PIN, they are required to submit a request to the University Registrar either in writing or in person with an acceptable form of picture identification. Unless otherwise requested by the student, the PIN is reset to a value based on the student birth date and pre-expired. The next time the student accesses their account they are required to declare a new PIN.

PIN records maintained by the University Registrar in the student information system are used in other University systems such as FACTS.org, TRAX, and the Blackboard Portal system. Administrators of these ancillary systems are required to restrict access to PIN records and only use them for the purpose of allowing students to authenticate to their systems.

Aside from Student ID/PIN security, other checks are employed to ensure a secure connection as well as to prevent unauthorized access to an individual student’s records. Internet connections to student records are monitored for inactivity. After five minutes of inactivity the session is timed-out. Any subsequent transaction submitted through the connection requires re-authentication before being processed.
Section V. Disaster Recovery/Business Resumption

The Office of the Registrar has a two-part mission: to support the University’s teaching function by documenting the extent and quality of students’ formal learning experiences at the University of South Florida and to provide exemplary service to students, faculty, and staff, and the general public in the creation, maintenance, and release of student academic records. The Office of the Registrar is specifically responsible for the academic records of students who enroll in credit offerings at the University.

The Office of the Registrar located on the Tampa campus maintains the official student academic records for both degree-seeking and non-degree-seeking students who enroll in credit courses offered by the University of South Florida. There are, however, three exceptions to the University Registrar’s responsibility for student records:

1. Academic records for students enrolled at New College were previously maintained in the Office of Records & Registration on the Sarasota Campus, with the New College Provost serving as custodian. Effective Fall Semester 2001, New College of Florida was established as the 11th public university in the State of Florida. Records of students attending prior to Fall 2001 were effectively transferred to the USF Office of the Registrar in 2003.

2. Academic records for students enrolled in the M.D. program are maintained in the College of Medicine, with the Office of Student Affairs as custodian.

3. Student records for non-credit courses are maintained in the Educational Outreach by the School of Continuing Education and Division of Lifelong Learning.

The following sections address only the student academic records that are maintained by the Office of the Registrar and for which the University Registrar is custodian.

As prescribed by Florida Administrative Code (FAC) 6A-10.24(12), the Office of the Registrar maintains complete student records of credit course activity at the institution. These academic records reflect a chronological (by term) history of all credit courses officially attempted at USF, along with the number of credits and the grades earned. When applicable, these records also reflect credits accepted in transfer and credits awarded for demonstrated competencies. Since 1988-89, listings of transfer credits include specific courses with grades and the number of credits accepted. Degrees awarded by USF and relevant degrees awarded by other institutions are also considered to be part of USF student academic records.

The student academic record is the internal document or electronic image maintained by the Office of the Registrar that reflects the unabridged academic history of the student at USF. It is a listing of the student’s total quantitative and qualitative learning experiences and achievements. Because the University was founded in the age of computer technology, a machine readable academic record exists for each of the ____________ students who ever enrolled in a USF credit course since the University opened in 1960. These machine-readable records or electronic images reside in electronic files that are part of an automated student information system. The system operates in a client-server environment using the Oracle relational data base management system on servers located in the CFRDC computer room. USF records are accessible in both online and batch modes. The (Banner) student information system was developed and is
maintained by Systems & Computer Technology (SCT) Corporation. This proprietary software is in use worldwide by colleges and universities.

In addition to electronic academic records, the Office of the Registrar maintains all documents related to the release of student records as required by the USF Student Records Policy, FAC 6C4-2.0021. Documents that are sources of or were used in administrative support for student permanent records are maintained in individual student folders, in centralized files, and/or on microfilm.

To insure against loss of student academic information in the electronic records, CFRDC technical support staff assure adequate physical protection of Student Information System software installation tapes or compact disks. Information Technologies maintains regular backups of the Student Information System database. There is a schedule of daily incremental backups and weekly full backups, some of which are taken to a secured off-site location on a regular basis.

Since the primary medium for maintaining USF student records is electronic, the University has taken measures to limit and control access to the Banner Student Information System. Internal security of the Banner instances is enforced by identification of each user via a valid logon ID, authentication of each user via a password, and authorization mechanisms to determine what each user is authorized to do. While Information Technologies is accountable for Banner system security, responsibility for authorizing access to and maintaining security for the Student Information System has been delegated to Primary Process Owners, of which the Office of the Registrar has primary responsibility. On campus, physical access to the Registrar’s Office and Central Florida Regional Data Center is restricted.

The Registrar’s Office also takes measures to insure the confidentiality of documents at the time of disposal. Paper or microfilmed documents with personally identifiable student information are disposed of in two ways: shredding with placement in a recycle bin or trash; or placement in locked recycling bins designated for confidential materials that are later removed by Physical Plant and taken to directly to the incinerator to be burned. The University’s contract for recycling with outside vendors calls for appropriate treatment and destruction of confidential documents.

The General Records Schedule A-3 for universities is published statewide by the Division of Library and Information Services, Department of State. This published policy provides public universities in Florida with the minimum requirements for the retention and disposal of specific student records and identifies those records that must be retained permanently. In addition, the USF Student Records Policy details the kinds of requests for and disclosures of information from the student record that must be maintained as part of the student’s permanent record. As a public university, USF observes all prescribed minimum records retention periods, follows disposal requirements, and maintains on a permanent basis all records so identified in Schedule A-3 and the USF Student Records Policy.

The USF Records Policy, FAC 6C4-2.0021, establishes institutional policies and procedures for information release, including the release of student records information:

1. To university officials for legitimate educational purposes,
2. Without student consent under the following situations:
a. To another college or institution where the student seeks/intends to enroll;
b. To certain federal/state officials who require information to audit or enforce legal conditions related to programs support by federal/state funds;
c. To parties who provide financial aid to the student in order to establish eligibility, to determine the amount of aid, to establish the conditions for receipt of aid or to enforce terms of an agreement relating to aid,

3. To accrediting organizations to carry out their accrediting functions,

4. To parents of a student if the parents claim the student as a dependent and proof of dependency is furnished to the FERPA Coordinator, and

5. To comply with a lawfully issued subpoena.

In accordance with the Student Records Policy, each year USF publishes a notice of student rights in its undergraduate and graduate catalogs as well as a statement titled, “Privacy and Release of Student Information,” or just, “Release of Student Information,” in the USF New Student Manual (distributed at orientation programs that are required for new undergraduates) and in the USF Student Handbook. A website has also been developed that allows students to view the USF privacy policy and update their level of disclosure.

In addition to recordkeeping for students in traditional credit courses, student records are kept for participants in CEU courses and non-credit courses. Educational Outreach maintains computerized participant records for all students who take non-credit courses for Continuing Education Units (CEU’s) for all programs administered through accounts in the School’s Extension Incidental Auxiliary. In addition, Educational Outreach maintains computerized participant records for students in continuing education activities where CEU’s are now awarded but where participants themselves pay for the activity or where attendance or participation is otherwise recorded in activities conducted through the auxiliary.
Glossary

Attendance - Includes but is not limited to (1) attendance - in person or by correspondence study (program) and (2) the period during which a person is working under a work-study (cooperative) program.

Directory Information - May include such student information as the student’s name, address, telephone number, date and place of birth, major fields of study, participation in officially recognized activities and sports, weight and height of athletic team members, photograph, dates of attendance, degrees and awards received, most recent educational institution attended, and other similar information as defined by the institution which would not generally be considered harmful to the student, or an invasion of privacy if disclosed.

Disclosure - Is defined as permitting access to or the release, transfer, or other communication of education records of the students or the personally identifiable information obtained therein to any party, orally, in writing, by electronic means, or by any other means.

Drafts - Those prepared materials which constitute mere precursors of governmental “records” and are not, in themselves, intended as final evidence of the knowledge to be recorded. Information in a form which is not intended to perpetuate, communicate, or formalize knowledge of some type; and is fully represented in the final product, is a “Draft” and not a “Public Record.” Material of this nature may be disposed of at the discretion of the public agency without prior consent from the Division of Library and Information Services.

Educational Institution - Any public or private agency or institution which receives funds from any federal program under the administrative responsibility of the Secretary of Education. The term refers to the institution as a whole, including all of its components (e.g., schools or departments in a university).

Education Records - Means those records directly related to a student and maintained by the institution or by a party acting for the institution. The term “education records” does not include the following:

- records of instructional, supervisory, administrative, and certain educational personnel which are in the sole possession of the maker thereof, and are not accessible or revealed to any other individual except a substitute who performs on a temporary basis (as defined in the institutional personnel policy) the duties of the individual who made the records.
- records maintained by a law enforcement unit of the educational agency or institution that were created by that law enforcement unit for the purpose of law enforcement.
- records relating to individuals who are employed by the institution, which are made and maintained in the normal course of business, relate exclusively to individuals in their capacity as employees, and are not available for use for any other purpose. (Records of individuals in attendance at an institution who are employed as a result of their status as students are education records, e.g., work study.)
- records relating to a student (see the definition of “eligible student”) which are (1) created or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional, acting in his/her professional capacity; (2) used solely in connection with the provision of treatment to the student; and (3) not disclosed to anyone other than individuals providing such treatment, so long as the records can be personally reviewed by a physician or other appropriate professional of the student’s choice. (Appropriateness may be determined by the institution.) “Treatment” in this
context does not include remedial educational activities or activities which are part of the program of instruction at the institution

- Records of an institution which contain only information relating to a person after that person is no longer a student at the institution (e.g., information gathered on the accomplishments of alumni).

**Eligible Student** - Refers to a student who has reached the age of 18 or is attending an institution of postsecondary education. Since these guidelines are specifically for postsecondary institutions, “student” as used in this document is presumed always to refer to an eligible student.

**General Records Schedule GS5 for Universities** - The document used by State Universities to establish their Records Retention Schedule. It was developed by the Florida Department of State, Division of Archives, History and Records Management.

**Institution of Postsecondary Education** - Refers to an institution that provides education to students beyond the secondary school level; “secondary school level” means the educational level (not beyond grade 12) at which secondary education is provided.

**Law Enforcement Unit Records** - Means those records, files, documents, and other material that are (1) created by a law enforcement unit, (2) created for a law enforcement purpose, and (3) maintained by the law enforcement unit. Law enforcement records do not include: (1) records created by a law enforcement unit for law enforcement purpose that are maintained by a component of the educational institution other than the law enforcement unit; (2) records created and maintained by a law enforcement unit exclusively for non-law enforcement purposes such as a disciplinary action or proceeding conducted by the institution.

**Legitimate Educational Interest** - Means an Educationally Related purpose which has a directly identifiable educational relationship to the student involved and underlies the request. More particularly, the following criteria shall be taken into account in determining the legitimacy of a University official’s access to student records.

- The official must seek the information within the context of the responsibilities that he or she has been assigned;
- The information sought must be used within the context of official University business and not for purposes extraneous to the official’s area of responsibility or the university;
- The information requested must be relevant and necessary to the accomplishment of some task or to making some determination within the scope of University employment;
- The task must be determined to be consistent with the purposes for which the data are maintained. Requests related to institutional research & studies are subject to this criterion.

Disclosure to a school official having a legitimate education interest does not constitute institutional authorization to transmit, share, or disclose any or all information received to a third party. **AN UNAUTHORIZED DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION FROM THE EDUCATION RECORD OF THE STUDENT IS PROHIBITED.**

**Parent** - Includes a parent, a guardian, or an individual acting as a student’s parent in the absence of a parent or a guardian.

**Personally Identifiable** - Means data or information which includes (1) name of the student, the student’s parent, or other family members; (2) the student’s address; (3) a personal identifier such as a social security number or student identification number; or (4) a list of personal characteristics, or other information which would make the student’s identity easily traceable.
Permanent Student Records - Student records that must be retained forever. Paper records that have permanent status are retained in their original form for an established period of time, e.g., 5 - 7 years, after the student was last enrolled. They are then stored in either microfilm/fiche or digitized on optical disk. After these records are stored on another medium, they may be destroyed according to Schedule GS5.

Record - Means any information or data recorded in any medium (e.g. handwriting, print, tapes, film, microfilm, microfiche, any form of electronic data storage).

Records Destruction Request Form - The official state form for requesting approval for destruction of records, according to Schedule GS5 or by a different schedule approved by the State.

Request for Records Retention Schedule or One-Time Disposal Authorization Form - The official state form for requesting authorization for a records retention schedule outside the limits of Schedule GS5 or for a one-time disposal permit.

School Officials - Are those members of an institution who act in the student’s educational interest within the limitations of their need to know. These may include faculty, administration, clerical and professional employees and other persons who manage student educational record information.

Student - Includes any individual for whom an educational institution maintains education records. The term does not include an individual who has not been in attendance at the institution. An individual who is or has been enrolled in one component unit of an institution, who applies for admission to a second unit, has no right to inspect the records accumulated by the second unit until enrolled therein.

Student Maintenance Records - Records that are retained for a period of time and then destroyed according to established plans based on Schedule GS5 or another State approved retention schedule.

Student Records Folder Materials - The records stored in student file folders in the Office of the Registrar.
6C4-2.0021 University of South Florida Student Records Policy

Student Records provisions of FERPA ((20 U.S.C. §1232g), are further amplified by Florida State Statutes (Section 1002.22), Board of Education Rules (6C-6.015) and University of South Florida Rules (6C4-2.0021.FAC)).

1) Introduction. The policies and procedures outlined in this rule are designed to implement the provisions of the Family Educational rights and Privacy Act [“FERPA”, 20 U.S.C. §1232g], and Florida Statutes Sections 228.093 and 240.237, pursuant to which the University of South Florida is obligated to inform students and parents of their rights to review and inspect education records, to challenge and seek to amend education records, to control disclosure of education records, and to complain to the FERPA Office or to Florida Circuit Court concerning alleged violations by the University of South Florida of any such rights. The University of South Florida has placed the responsibility for administration of this rule with its FERPA Coordinator who is the University Registrar.

2) Definitions. The following definitions of terms apply to the construction of this rule:
   (a) Student – an individual who is registered for an on-or-off campus program leading to the award of academic credit from the University. “Student” does not include individuals participating in the Common Learning Network, Language Institute, Gifted Programs, Speech and Hearing Clinics and non-credit Continuing Education programs.
   (b) Education Records – those records which are maintained by the University and employees/agents of the University which contain information directly related to a student. “Record”, as used herein, includes any information or data recorded in any medium, including but not limited to, handwriting, print, magnetic tapes and disks, film, microfilm, and microfiche. “Agents”, as used herein, means any individual who, pursuant to express or implied authorization, represents and acts for the University. The following types of records are expressly exempt from the definition of “education records”:

   1. Sole possession records – personal records of University employees/agents which meets the following test:
      A. It was created by the University employee/agent as a personal memory aid; and
      B. It is in the sole possession of the University employee/agent who created it; and
      C. The information contained in it has never been revealed or accessible to any other person, including the student, except the University employee’s/agent’s “temporary substitute”. “Temporary substitute”, as used herein, means an individual who performs on a temporary basis the duties of the University employee/agent.

   2. Employment records – records which are used only in relation to an individual’s employment by the University. However, the following are education records rather than employment records:
      A. Records relating to a student’s employment by the university if the position in which the student is employed depends on his/her status as a student.
B. Records relating to a student’s employment by the University if the student receives a grade or credit based on his/her performance as an employee.

3. Pre-attendance records – records relating to an individual’s application for admission to the University of South Florida prior to his/her actual attendance as an enrolled student in the program for which application was made. This includes records relating to an application for admission to one of the colleges within the University prior to the individual’s actual attendance as an enrolled student in that college.

4. Alumni records – records created and maintained on an individual as an alumnus/alumna of the University of South Florida.

5. Law enforcement records – records created and maintained by the University Police which are used solely for law enforcement purposes, are maintained apart from education records, and are not disclosed to individuals other than law enforcement officials of the same jurisdiction; provided that, in addition, no member of the university Police shall have access to education records except where this rule authorizes release without the student’s prior written consent.

6. Health records – records of the University’s Student Health Services and Counseling Center for Human Development which are used only for the provision of medical, psychiatric, or psychological treatment and which are kept separate from education records.

(c) Personal identifier – any data or information that relates a record to an individual. This includes the individual’s name, the name of the individual’s parents, or other family members, the individual’s address, the individual’s social security number and any other number or symbol which identifies the individual, a list of the individual’s personal characteristics, or any other information which would make the individual’s identity known and can be used to label a record as the individual’s record.

(3) Annual Notification.

(a) The University will publish annually in the graduate and undergraduate catalogs a notice of students’ rights under FERPA and Florida Statutes Sections 1022.22.

(b) The notice will include, but not be limited to, the following:

1. The right of the student to inspect and review his/her education records.

2. the intent of the University to limit the disclosure of information contained in a student’s education records to the following circumstances:
   A. With the student’s prior written consent; or
   B. As an item of directory information which the student has not refused to permit the University to disclose; or,
   C. Under the FERPA and Florida Statutes provisions which allow the University to disclose information without the student’s prior written consent.

3. The right of a student to request the University to amend any part of his/her education record which he/she believes to be inaccurate, misleading, or in violation of his/her privacy or other rights; and, should the University deny the student’s request, the right of the student to a hearing to present evidence that the record is inaccurate, misleading, or in violation of his/her privacy or other rights.
4. The right to report violations of FERPA to the Family Policy Compliance Office of the U.S. Department of Education, and to bring an action in Florida Circuit Court for violations of Florida Statutes Section 1002.22.

5. The locations where copies of this rule are available to students.

(4) Locations of Education Records.

(a) Admission records are located in the Office of Admissions, Student Services Building, and the custodian for such records is the Director of Admissions, University of South Florida, SVC 1036, 4202 East Fowler Avenue, Tampa, FL 33620.

(b) Cumulative academic records are located in the Office of the Registrar, Student Services Building, and the custodian for such records is the University Registrar, University of South Florida, SVC 1034, 4202 East Fowler Avenue, Tampa, FL 33620-6950.

(c) Medical records are located in Student Health Services, and the custodian for such records is the Director, Student Health Services, SHS 100, 4202 East Fowler Avenue, Tampa, Florida 33620.

(d) Psychological/Psychiatric counseling records are located in the Counseling Center for Human Development, Student Services building, and the custodian for such records is the Director, Counseling Center for Human Development, University of South Florida, SVC 2125, 4202 East Fowler Avenue, Tampa, Florida 33620.

(e) Student employment records are located in the Student Employment Office, Student Services Building, and the custodian for such records is the Director, Student Employment, University of South Florida, SVC 1037, 4202 East Fowler Avenue, Tampa, Florida 33620.

(f) Financial aid records are located in the Financial Aid Office, Student Services Building, and the custodian for such records is the Director, Financial Aid Office, University of South Florida, SVC 1102 4202 East Fowler Avenue, Tampa, Florida 33620.

(g) Financial records are located in the Division of Finance and Accounting, Administration Building, and the custodian for such records is the University Controller, Division of Finance and Accounting, University of South Florida, ADM 147, 4202 East Fowler Avenue, Tampa, Florida 33620.

(h) Cooperative education and placement records are located in the Career Resource Center, Student Services Building, and the custodian for such records is the Director, Career Development Services, University of South Florida, SVC 2088, 4202 East Fowler Avenue, Tampa, Florida 33620.

(i) College records are located in the college dean’s office and/or departmental offices of each college or department and in the faculty offices at each college or department and the custodian for such records is the appropriate dean, department chairperson, professor, instructor or lecturer.

(j) Disciplinary records are located in the Office of Student Affairs, Administration Building, and the custodian for such records is the Associate Vice President for Student Affairs and Dean of Students, University of South Florida, ADM 151, 4202 East Fowler Avenue, Tampa, Florida 33620.

(k) Continuing Education records are located in the Office of the Registrar, Student Services building, and the custodian for such records is the University Registrar, University of South Florida, SVC 1034, 4202 East Fowler Avenue, Tampa, Florida 33620-6950.

(l) All records relating to students enrolled in the University’s College of Medicine are located in the appropriate College of Medicine office, and the custodian for such records
is the Office of Student Affairs, College of Medicine, University of South Florida, MDC 4, 12901 Bruce B. Downs Boulevard, Tampa, Florida  33612.

(m) Records relating to students enrolled in the New College program of the University are located in the appropriate New College office, and the custodian for such records is the Provost, New College, University of South Florida, 5700 North Tamiami Trail, Sarasota, Florida  34243.

(n) Occasional records, student education records not included in the types or systems listed above, such as copies of correspondence in offices not listed, etc., the FERPA Coordinator will collect such records, direct the student to their location, or otherwise make them available for inspection and review.

(5) Procedure to Inspect Education Records.

(a) Students who wish to inspect and review their education records should submit a written request to the appropriate record custodian or to the FERPA Coordinator. The request should identify as accurately as possible the specific records the student wishes to inspect and review. It may identify records according to the types listed in subsection (4) of this rule, as records located at specific places, or as records under the custodianship of specific University employees/agents identified by title. Records listed in this rule as “occasional records” should be identified in terms which will make it possible for the FERPA coordinator to locate them and make them available for the student to inspect and review.

(b) The FERPA Coordinator or the record custodian shall either permit the student to immediately inspect and review his/her education records or advise the student when and where the records will be available for inspection and review. Access to education records requested in compliance with this rule shall be granted within a reasonable period of time, but in no case more than thirty (30) calendar days after the FERPA Coordinator or the record custodian receives the student’s written request. The FERPA Coordinator or the record custodian or his/her designee shall have the right to be present while the student inspects and reviews the records. Upon reasonable request, the University shall furnish the student with an explanation or interpretation of his/her record.

(c) Upon reasonable request and demonstration to the FERPA Coordinator that the failure to provide the student with copies of the requested education records will effectively deny the student the right to inspect and review such records, the University will arrange for the student to obtain copies of such records. In the event that the student has an unpaid financial obligation to the University, he/she shall not be entitled to transcripts or copies of education records.

(d) When records contain personally identifiable information about more than one student, a student may inspect only that information which relates to him/her.

(e) The University reserves the right to refuse to permit a student to inspect and review the following education records:
1. The financial records of the parents of the student or any information contained therein;
2. Statements and letters of recommendation prepared by University officials or submitted with the student’s application for admission which were placed in the student’s records before January 1, 1975 or for which the student has waived his/her right of access in writing; provided, however, that if such statements and
letters of recommendation have been used for any purpose other than that for which they were originally prepared, the student may inspect and review them.

3. Those records which are excluded from the definition of “education records” under this rule.

(a) Fees: The University will charge the following fees for copies of education records:

1. University of South Florida official transcripts - $5.00.
2. FERPA required copies of education records – the fee for FERPA requires copies of education records shall be Ten Cents ($.10) per page, which reflects actual copying costs but does not include the cost of search and retrieval. Copies of education records are required by FERPA under the following circumstances:
   A. A failure to provide such copies would effectively deny the student the right to inspect and review his/her records; or the student the right to inspect and review his/her records; or
   B. The University has disclosed information from the student’s education records under authority of the student’s prior written consent and the student requests a copy of the information disclosed; or
   C. The student requests copies of records the University has disclosed to other schools where the student seeks or intends to enroll.

3. Copies (not signed and certified) of education records will be available to students when administratively possible, even though not required by FERPA, at a copying cost of One Dollar ($1.00) per page plus the actual cost of search, retrieval and mailing.

(b) When administrative costs of collecting fees exceed the amount which would be received, the FERPA Coordinator shall be authorized to waive such fees.
(c) The University reserves the right to deny transcripts or copies of records not required by FERPA in any of the following situations:

1. The student has an unpaid financial obligation to the University of South Florida.
2. There is an unresolved disciplinary action against the student.
3. There is an unresolved litigation between the student and the University of South Florida.

(7) Directory Information.
(a) Designation of directory information. The University hereby designates the following described personally identifiable information contained in a student’s education record as “directory information” in order that the University may, at its discretion, disclose the information without a student’s further prior written consent:

1. The student’s name.
2. The student’s local and permanent addresses.
3. The student’s local and permanent telephone listings.
4. Date and place of birth.
5. The student’s classification and major field of study.
6. The student’s participation in officially recognized activities and sports.
7. The weight and height of members of athletic teams.
8. The student’s dates of attendance part-time or full-time status, degrees and awards received, and most recent previous educational agency or institution attended.
9. The student’s photographic image.
10. Other similar information.

(b) Student’s refusal to permit disclosure of “directory information.” The University will publish in the Schedule of Classes for each academic term the above list, or a revised list, of the items of information it proposes to designate as “directory information.” Students must notify the FERPA Coordinator in writing if they refuse to permit the University to disclose directory information about themselves; such notification must be received by the FERPA Coordinator no later than the end of the second week of classes of the academic term or the student will be deemed to have waived his/her right of refusal until the next academic term. When the FERPA Coordinator receives a student’s refusal to permit the University to disclose “directory information” about that student, the FERPA Coordinator will notify the appropriate records custodians of the student’s action. The records custodians will not make any further disclosures of directory information about that student without the student’s prior written consent except to the extent authorized by FERPA and the Florida Statutes.

(c) Publication of directory information in the University Directory. The University of South Florida proposes to publish for each academic year a University Directory which will contain certain items of directory information respecting students who are registered during the Fall Semester of such academic year. Students registering during the Fall Semester must notify the FERPA Coordinator in writing of their refusal to permit the university to disclose or publish directory information in the University Directory; such notification must be received by the FERPA Coordinator no later than the end of the second week of classes of the Fall Semester or the student will be deemed to have waived his/her right of refusal with respect to the University Directory until Semester One of the next academic year.

(d) Requests for directory information. All requests for directory information about students should be referred to the FERPA Coordinator.

(8) Use of Education Records. All custodians of a student’s education records and other University employees/agents will follow a strict policy that information contained in a student’s education record is confidential and may not be disclosed to third parties without the student’s prior written consent except as otherwise provided in this section.

(a) University officials shall have access to student education records for legitimate educational purposes.

   1. “University official,” as used herein, means:
      A. A person currently serving as a member of the Florida Board of Education.
      B. A person under contract to the Florida Board of Education/University of South Florida or the Florida department of Administration in any faculty or staff position at the University of South Florida.
      C. A person employed by the Florida Board of Education as a temporary substitute for a staff member or faculty member at the University of South Florida for the period of his/her performance as a substitute.
      D. A person employed by the Florida Board of Education or under contract to the Florida Board of Education to perform a special administrative task for the University of South Florida. Such persons may be employed as secretaries, clerks, attorneys, auditors, and consultants. They shall be
considered to be University officials for the period of their performance as an employee or contractor.

2. “Legitimate educational purpose,” as used herein, means a University official’s need to know in order to:
   A. Perform an administrative task outlined in the official’s position description or contract; or
   B. Perform a supervisory or instructional task directly related to the student’s education; or
   C. Perform a service or benefit for the student such as health care, counseling, student job placement, or student financial aid.

(b) Under the following circumstances, University officials may make disclosures of personally identifiable information contained in the student’s education records without the student’s consent:

1. To another college or university where the student seeks or intends to enroll.
2. To certain federal and state officials who require information in order to audit or enforce legal conditions related to programs at the University supported by federal or state funds.
3. To parties who provide or may provide financial aid to the student in order to:
   A. Establish the student’s eligibility for the financial aid;
   B. Determine the amount of financial aid;
   C. Establish the conditions for the receipt of the financial aid; or
   D. Enforce the terms of the agreement between the provider and the receiver of the financial aid.
4. To state or local officials in compliance with state law adopted prior to November 19, 1974.
5. To an individual or organization under written agreement or contract with the University of South Florida or the Florida Board of Education for the purpose of conducting a study on the University’s behalf for the development of tests, the administration of student aid, or the improvement of instruction.
6. To accrediting organizations to carry out their accrediting functions.
7. To parents of a student if the parents claim the student as a dependent under the Internal Revenue code of 1954. The University will exercise this option only on the condition that evidence of such dependency is furnished to the FERPA Coordinator.
8. To comply with a lawfully issued subpoena or judicial order of a court of competent jurisdiction. The University will make a reasonable effort to notify the student before it makes a disclosure under this provision.
9. The result of a disciplinary proceeding may be released to the victim of the student’s crime of violence.
10. All requests for disclosure under the nine (9) circumstances listed above, where the University may disclose personally identifiable information without the student’s prior consent to third parties other than its own officials, will be referred to the FERPA Coordinator or appropriate records custodian.

(c) University officials are authorized to make necessary disclosures from student education records, without the student’s prior consent in a health or safety emergency if the University official deems:
1. The disclosure to be warranted by the seriousness of the threat to the health or safety of the student or other persons; and
2. The information disclosed is necessary and needed to meet the emergency; and
3. The persons to whom the information is disclosed are qualified and in a position to deal with the emergency; and
4. Time is an important and limiting factor in dealing with the emergency.

(d) University officials may not disclose personally identifiable information contained in a student’s education record, except directory information or under the circumstances listed above, except with the student’s prior written consent. The written consent must include the following:
1. A specification of the information the student consents to be disclosed;
2. The person or organization or the class of persons or organizations to whom the disclosure may be made; and
3. The date of the consent.

(e) The student may obtain a copy of the records the University discloses pursuant to the student’s prior written consent.

(f) The University will not release information contained in a student’s education records, except directory information, to any third parties except its own officials, unless those third parties agree that they will not disclose the information without the student’s prior written consent.

(9) Records of Requests for Access and Disclosures Made from Education Records.
(a) All requests for disclosures of information contained in a student’s education record or for access to the record made by persons other than University officials or the student or those requests accompanied by the student’s prior written consent will be submitted to the FERPA Coordinator or appropriate records custodian. The FERPA Coordinator or appropriate records custodian will approve or disapprove all such requests for access and disclosures and, except for requests for directory information, he/she will maintain a record of these actions.

(b) This record of requests/disclosures shall include the following information:
   1. The name of the person or agency that made the request.
   2. The interest the person or agency had in the information.
   3. The date the person or agency made the request.
   4. Whether the request was granted and, if it was, the date access was permitted or the disclosure was made.

(c) The University will maintain this record of requests/disclosures as long as it maintains the student’s education record.

(10) Procedures to Request Amendment of and Challenge Education Records.
(a) Students have the right to, in accordance with this rule, request amendment of and challenge the content of their education records.

(b) Definitions.
1. The term “incorrect” is used herein to describe a record that is inaccurate, misleading, or in violation of the privacy or other rights of students. A record is not “incorrect”, for purposes of this rule, where the requestor wishes to challenge the evaluation reflected by the grade an instructor assigns for a course.
2. The term “requestor” is used herein to describe a student or former student who is requesting the University to amend a record.
(c) Students who believe that their education records contain information which is incorrect
should informally discuss the problem with the record custodian. If the record custodian
finds the information is incorrect because of an obvious error, and it is a simple matter to
amend it to the satisfaction of the requestor, the record custodian may make the
amendment.

(d) If the record custodian cannot amend the record to the requestor’s satisfaction or if the
record does not appear to be obviously incorrect, the record custodian will:
1. Provide the requestor a copy of the questioned record at no cost; and
2. Ask the requestor to initiate and provide the record custodian a written request for
the amendment; such written request must identify the information which the
requestor believes is incorrect, must state why such information is incorrect, and
must be dated and signed by the requestor.

(e) The record custodian will send the request, together with a written explanation of his/her
refusal to amend the record to the requestor’s satisfaction, to the FERPA Coordinator.
The FERPA Coordinator will examine the request, discuss it with appropriate University
officials, including the person who initiated the record, the University General Counsel,
and other persons who might have an interest in the questioned record. At the conclusion
of this investigation, the FERPA Coordinator will summarize his/her findings, make a
recommendation for the University’s action, and deliver the request, the record
custodian’s written explanation, his/her summary of findings, and his/her
recommendation to the University President.

(f) The University President will instruct the FERPA Coordinator whether the record should
or should not be amended in accordance with the request. If the University President’s
decision is to amend the record, the FERPA Coordinator will advise the record custodian
to make the amendment. The record custodian will advise the requestor in writing when
he/she has amended the record and invite the requestor to inspect the record.

(g) If the University President’s decision is that the record is correct and should not be
amended, the FERPA Coordinator will prepare and send the requestor a letter stating the
decision. This letter will also inform the requestor that the requestor has a right to a
hearing pursuant to the Florida Administrative Procedures Act to challenge the
University’s decision not to amend.

(h) In the event the education records are not amended to the requestor’s satisfaction, the
requestor shall have the right to place with the education records a written statement
explaining, commenting upon, or disagreeing with information contained in the education
records. This statement shall be maintained as part of the student’s education record for
as long as the University maintains the questioned part of the record. Whenever the
questioned part of the record is disclosed, the student’s written statement shall also be
disclosed.

(11) Right of Waiver of Access - The University may request a waiver of access to
evaluations and letters of recommendation related to admissions, employment
applications and receipt of honors. While such a waiver may be requested, requests for
waivers do not constitute a pre-condition for admission, financial aid, or any services or
benefits. Upon request, students who have waived access to such items can receive a
listing of all individuals providing confidential recommendations or evaluations.

Specific Authority §120.53(1)(a),(b), 240.227(1), 240.237 FS.
Law Implemented §120.53(1)(a), 240.227(1), 228.093, 240.237 FS
History – New 4-19-83, Formerly 6C4-2.021, Amended 3-15-92, 1-7-93.
NAME OF PERSON ORIGINATING PROPOSED RULE AMENDMENT: Linda Erickson, Registrar
NAME OF SUPERVISOR OR PERSONS WHO APPROVED THE PROPOSED RULE AMENDMENT: G.G. Meisels, Provost
DATE PROPOSED RULE AMENDMENT APPROVED:
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General Information and Instructions i

I. Statutory Authority

II. Determining Retention Requirements

III. Scheduling and Disposition of Public Records
GENERAL RECORDS SCHEDULE GS5

General Information and Instruction

I. STATUTORY AUTHORITY

This General Records Schedule is issued by the Department of State, Division of Library and Information Services, Bureau of Archives and Records Management in accordance with the statutory provisions of Chapters 119 and 257, Florida Statutes.

Chapter 119, F.S., defines “public records” in terms of physical characters; and in legal and/or official documentation relationships, it also defines “agency” providing an inclusive listing of state, local and special government officials and organizational elements subject to laws and regulations pertaining to public records. In addition, the Chapter establishes the legal basis for custody and disposal of public records and for public access to these records.

Chapter 257. F.S., establishes the State’s Records Management and Archives Program under the direction of the Division of Library and Information Services, Department of State; it specifically provides for a system for the scheduling and disposal of public records. The chapter also authorizes the Division to establish and coordinate standards, procedures, and techniques for efficient and economical record making and keeping.

II. DETERMINING RETENTION REQUIREMENTS

In determining the retention requirements of public records, four values must be evaluated to assure that the records will fulfill their reason for creation and maintenance. These are the administrative, legal, fiscal and the historical value. These four values have been considered in depth to determine the retention requirements of the records listed herein.
III. SCHEDULING AND DISPOSITION OF PUBLIC RECORDS

The procedure for scheduling and disposal of public records, applicable to all agencies, consist of two separate but relates actions:

A. Establishing a Records Retention Schedule – A schedule describing the records and setting the retention period is required for each record series, or type, of record. This determines officially the length of time that the record series must be retained to meet retention requirements.

1. General Records Schedules establish disposition standards for records common to several or all agencies of the State of Florida. The records covered by these schedules pertain to both administrative and program functions of the agencies. General Records Schedule GS1 is applicable to administrative records only and may be used by any agency of the state. All other General Records Schedules are applicable to program records of specific functional organizations of the state which may have unique retention requirements. These general records schedules have been designed to complement each other to cover as many administrative and program records as possible. For example: General Records Schedule GS5 will contain program records for Universities and Community Colleges and administrative records for the agency will be contained in General Records Schedule GS1. Should duplicate records series be contained in these two general records schedules, the retention requirements of General Records Schedule GS5 shall take precedence. The retention period stated in the applicable schedule is the MINIMUM time a record is to be maintained. If two or more record series are filed together, the combined file must be retained through the longest retention period of those records. A General Records Schedule eliminates the need for the creation and submission of an individual Records Retention Schedule, Form LS5E105. However, an agency desiring a lesser retention period than that stated in a General Records Schedule must apply for the establishment of an individual agency retention schedule should be submitted for approval.

2. Individual Records Schedules are established when the agency submits a Records Retention Schedule, Form LS5E105, to the Division of Library and Information Services and receives approval from the Division. Once an official retention value has been established for a record series, records in the series are eligible for disposal action when they have met the retention requirements. The schedule remains effective until there is a change in series content or other factors are introduced which would affect the initial retention period, at which time a new individual records schedule should be submitted for approval.
A. **Obtaining Disposition Authorization** – When records have met retention requirements established by a General Records Schedule or an individual agency retention schedule, an agency may initiate disposition action by submitting a Records Disposition Request, Form LS5E107, to the Division. Rule 1B-24.01(3), Florida Administrative Code, however, states that “records with a retention of “obsolete, superseded or administrative value is lost” are not required to be submitted on a Records Disposition Request prior to disposal.” The request, when approved by the Division, authorizes the disposition of the listed records. It also serves as a certificate of records destroyed when signed by an agency official. The request must be submitted and approved before actual disposition is carried out. The request assures that there is no premature destruction of records, or that records to be destroyed do not have an immediate or urgent value beyond the original retention period.

Full instruction for disposal procedures and completing the Records Disposition Request, Form LS5E107 are contained in General Records Schedule GS1 and the Basics of Records Management handbook.
GENERAL RECORDS SCHEDULE GS5
UNIVERSITIES AND COLLEGES

ADMISSION RECORDS: REGISTERED STUDENT
Item #41
This record series consists of correspondence, application, transcripts, equivalency diploma, residency affidavit, conditional enrollment form, and re-admission forms of students who have registered for classes. See also “ADMISSION RECORDS: STUDENTS DENIED ADMISSION” and/or “ADMISSION RECORDS: UNREGISTERED STUDENT.”

RETENTION:
(a). Record copy
   Five (5) years after attendance provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

ADMISSION RECORDS: STUDENT DENIED ADMISSION
Item #42
This record series consists of correspondence, application, transcripts, equivalency diploma, residency affidavit, conditional enrollment form, and re-admission forms of students who have been denied admission. See also “ADMISSION RECORDS: REGISTERED STUDENT” and/or “ADMISSION RECORDS: UNREGISTERED STUDENT.”

RETENTION:
(a). Record copy
   Three (3) years after application submitted.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

ADMISSION RECORDS: UNREGISTERED STUDENT
Item #3
This record series consists of correspondence, application, transcripts, equivalency diploma, residency affidavit, conditional enrollment form, and re-admission forms of students who have not registered for classes. See also “ADMISSION RECORDS: REGISTERED STUDENT” and/or “ADMISSIONS RECORDS: STUDENTS DENIED ADMISSION.”
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
CLASS ROLLS Item #6
This record series consists of all students enrolled in class during a particular grading period.

RETENTION:
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

CLASS, COURSE, ROOM, AND FACULTY SCHEDULES Item #48
This record series consists of class meeting times and days for each course, room assignments, teaching schedules including office hours.

RETENTION:
(a). Record copy
   Retain until end of semester.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

COMMITTEE RECORDS Item #49
This record series consists of documents the service of individuals on university committees and boards.

RETENTION:
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

COURSE AND PROGRAM RECORDS Item #50
This record series consists of course descriptions, outlines, program documentation, policies, plans for use of special media, outside instructional materials, sampling of student evaluation tools, and other actions related to each course and program.

RETENTION:
(a). Record copy
   Retain until obsolete, superseded or administrative value is lost.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
DISCIPLINE RECORDS: STUDENT (FINAL ACTION)  Item #52
This record series consists of final action minutes of the discipline committee, student court, correspondence, and other supporting documents. See also “DISCIPLINE RECORDS: STUDENT (MAJOR OFFENSE),” “SUSPENSION RECORDS,” and/or “DISCIPLINE RECORDS: STUDENT (MINOR OFFENSE).”
RETENTION:
(a). Record copy
   Five (5) years after matriculation.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

DISCIPLINE RECORDS: STUDENT (MAJOR OFFENSE)  Item #53
This record series consists of minutes of the discipline committee, student court, correspondence, and other supporting documents of a student committing a major offense. See also “DISCIPLINE RECORDS: STUDENT (FINAL ACTION)” and/or “DISCIPLINE RECORDS: STUDENT (MINOR OFFENSE).”
RETENTION:
(a). Record copy
   Retain until posted to permanent record.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

DISCIPLINE RECORDS: STUDENT (MINOR OFFENSE)  Item #54
This record series consists of minutes of the discipline committee, student court, correspondence, and other supporting documents of a student committing a minor offense. See also “DISCIPLINE RECORDS: STUDENT (FINAL ACTION)” and/or “DISCIPLINE RECORDS: STUDENT (MAJOR OFFENSE).”
RETENTION:
(a). Record copy
   Five (5) years.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

DROP/ADD RECORDS  Item #40
This record series consists of drop/add cards, submitted by students for the purposes of dropping and/or adding classes. This is not to be confused with withdrawal records. See also “WITHDRAWAL RECORDS.”
RETENTION:
(a). Record copy
   One (1) semester after posted.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
ENROLLMENT RECORDS
This record series consists of report on cumulative credit hours equivalency and enrollment submitted to the Division of Community College. See also “ENROLLMENT RECORDS: DEPARTMENTAL COPIES.”
RETENTION:
(a). Record copy
   Permanent
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

EXPULSION RECORDS: STUDENT
This record series consists of suspension notices stating the reasons therefore, investigative reports, notice of hearing, transcript, recommendations, and final outcome. See also “DISCIPLINE RECORDS: STUDENT (FINAL ACTION)” and/or “DISCIPLINE RECORDS: STUDENT (MAJOR OFFENSE).”
RETENTION:
(a). Record copy
   Five (5) years after graduation, transfer or withdrawal.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

FACILITY ASSIGNMENT REPORTS
This record series consists of computer generated reports issued each semester documenting faculty workload in instruction and/or research.
RETENTION:
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

FINANCIAL AID RECORDS
This record series consists of student applications, award computations, acceptance letters, student assignment and evaluations.
RETENTION:
(a). Record copy
   Five (5) years after last enrollment provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

GENERAL EQUIVALENCY DIPLOMA (GED) RECORDS
This record series consists of application, transmittal sheets, correspondence and test results. The permanent record/diploma is retained by the Department of Education. The retention period is pursuant to Florida Administrative Code Rule 6A-14.051.
RETENTION:
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

GRADE RECORDS: DATA INPUT FORMS Item #62
This record series consists of instructor grade reports, grade sheets, and grade changes that are used to create and update the students’ transcripts.
RETENTION:
(a). Record copy
   One (1) semester provided posted to Student Record.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

IDENTIFICATION RECORDS: FEE PAID Item #66
This record series consists of identification cards and photographs for all employees and students which may include the employee’s name, date of birth, height, weight, sex, race, agency head’s name and agency being represented by the employee and the fee is paid. See also “IDENTIFICATION RECORDS: NO FEE PAID.”
RETENTION:
(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

IDENTIFICATION RECORDS: NO FEE PAID Item #67
This record series consists of identification cards and photographs for all employees and students which may include the employee’s name, date of birth, height, weight, sex, race, agency head’s name and agency being represented by the employee and no fee is paid. See also “IDENTIFICATION RECORDS: FEE PAID.”
RETENTION:
(a). Record copy
   Retain until obsolete, superseded or administrative value is lost.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

PLACEMENT REPORTS Item #18
This record series consists of yearly placement reports of adult, vocational and technical high Colleges which shows percentage of placement of students.
RETENTION:
(a). Record copy
 Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

PROCEDURES: MANUALS
Item #22
This record series consists of published documents that provide the series of steps to be followed in completing a specific task.

RETENTION:
(a). Record copy
 Retain until obsolete, superseded or administrative value is lost.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

REGISTRATIONS: STUDENT
Item #27
This record series consists of records for registration showing name, validation number, and fees and back-up cards showing course name, department and amount of fees if applicable. The retention period for the record copy was established pursuant to Florida Administrative Code Rule 6A-14.051.

RETENTION:
(a). Record copy
 Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

SCHOLARSHIP/LOAN RECORDS
Item #83
This record series consists of complete files on state scholarship recipients and student loans. These files include application, award letter, letter of acceptance, renewal application, all correspondence, deferment form, cash payment receipts, certificate of service receipts and account card. File established to maintain complete record of scholarship from application until all notes are satisfies. See also “FINANCIAL AID RECORDS.”

RETENTION:
(a). Record copy
 Five (5) fiscal years after paid.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

STATE STUDENT ASSESSMENT RECORDS: TEST RESULTS/REPORTS
Item #84
This record series consists of mastery results and reports of minimum performance standards in reading, writing and mathematics and demonstrated ability to successfully apply basic skills to everyday life situations as required by Florida Statutes Section 232.246(1)(b). These include
“CLAST,” “ASSET,” “ACT,” “MAPS,” and “SAT.” See also “EXAMINATION MATERIALS: STANDARDIZED (STUDENT).”

RETENTION:
(a). Record copy
 Three (3) fiscal years provided applicable audits have been released.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

STUDENT ADVISEMENT RECORDS: GRADUATE
Item #86
This record series consists of the results of interest inventories, individual aptitude and ability tests, personality inventory, AET, CEEB, SCAT, and BCC placement tests, counselors’ notes, copies of transcripts, grade reports, personal data sheets, appointment and advisement slips, correspondence and other documents pertaining to individual students who have graduated. See also “STUDENT ADVISEMENT RECORDS: WITHDRAWAL,” “STUDENT COUNSELING RECORDS: GRADUATE” and/or “STUDENT COUNSELING RECORDS: WITHDRAWAL.”

RETENTION:
(a). Record copy
 One (1) year after graduation transfer or withdrawal.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

STUDENT ADVISEMENT RECORDS: WITHDRAWAL
Item #87
This record series consists of withdrawal records which includes the result of interest inventories, individual aptitude and ability tests, personality inventoried, AET, CEEB, SCAT and BCC placement tests, counselors’ notes, copies of transcripts, grade reports, personal data sheets, appointment and advisement slips, correspondence and other documents pertaining to individual students that have withdrawn from school. See also “STUDENT ADVISEMENT RECORDS: GRADUATE,” “STUDENT COUNSELING RECORDS: GRADUATE” and/or “STUDENT COUNSELING RECORDS: WITHDRAWAL.”

RETENTION:
(a). Record copy
 Three (3) years after transfer or withdrawal.
(b). Duplicates
 Retain until obsolete, superseded or administrative value is lost.

STUDENT APPEAL RECORDS
Item #88
This record series consists of appeals for grade changes, withdrawal after deadline, refunds, graduation fees, and residency waivers.

RETENTION:
(a). Record copy
 Three (3) years after final appeal, provided posted to permanent record provided applicable audits have been released.
STUDENT COUNSELING RECORDS: GRADUATE

This record series consists of transcripts, grade reports, personal data sheets, appointment and advisement slips, correspondence and other documents pertaining to individual students. See also “STUDENT ADVISEMENT RECORDS: GRADUATE,” “STUDENT ADVISEMENT RECORDS: WITHDRAWAL” and/or “STUDENT COUNSELING RECORDS: WITHDRAWAL.”

RETENTION:

(a). Record copy
   One (1) year after graduation, transfer or withdrawal.

(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
STUDENT COUNSELING RECORDS: WITHDRAWAL  Item #29
This record series consists of withdrawal records which include transcripts, grade reports, personal data sheets, appointment and advisement slips, correspondence and other documents pertaining to individual students. See also “STUDENT ADVISEMENT RECORDS: GRADUATE,” “STUDENT ADVISEMENT RECORDS: WITHDRAWAL” and/or “STUDENT COUNSELING RECORDS:WITHDRAWAL.”

RETENTION:
(a). Record copy.
   Three (3) years after transfer or withdrawal
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

STUDENT EDUCATION RECORDS: SUPPORTING DOCUMENTS  Item #89
This record series consists of admissions applications, correspondence, drop/add forms, applications for degree, request for Florida residence affidavit, registration information, applications to change undergraduate classification, change slips, notice of admission, credit by exam notes, transcript verification forms, student petition records, student transcript flag notices, national test scores, and graduation information. These records relate to the maintenance of the active student record.

RETENTION:
(a). Record copy
   Five (5) years after graduation, transfer or withdrawal provided applicable audits have been released.
(b). Duplicates
   Retail until obsolete, superseded or administrative value is lost.

STUDENT TRANSCRIPTS  Item #91
This record series consists of the official student record documenting courses taken, grades received and degrees awarded.

RETENTION:
(a). Record copy
   Permanent
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

SUSPENSION RECORDS  Item #33
This record series consists of files and related materials created in reviewing an adverse action or statement against a student, copy of the proposed adverse action with supporting documents, statements of witnesses, reports, and decisions. See also “DISCIPLINE RECORDS.”

RETENTION:
(a). Record copy
   Three (3) years.
(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
VETERANS RECORDS: EDUCATIONAL ASSISTANCE  

Item #94

This record series consists of file for each veteran and eligible person certified to receive Veterans Administration educational assistance. The retention period mentioned below for the record copy was established pursuant to Section 38 CFR 21.4209.

RETENTION:

(a). Record copy
   Three (3) fiscal years provided applicable audits have been released.

(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.

WITHDRAWAL RECORDS  

Item #35

This record series consists of cards submitted by student through instructor to withdraw from a class or classes. See also “DROP/ADD RECORDS.”

RETENTION:

(a). Record copy
   Five (5) years after transfer or withdrawal.

(b). Duplicates
   Retain until obsolete, superseded or administrative value is lost.
The Family Educational Rights and Privacy Act (FERPA) gives students the right to refuse to permit USF to publish or disclose items of directory information pertaining to them.

What is disclosure?
Permission to access, release, transfer, or communicate personally identifiable information. Provision of common disclosures include: An enrollment verification to your insurance company; a degree verification to a prospective employer; your name listed in the USF Directory, or Commencement and Honors programs; or your name, address, or telephone number being made available to the public or marketing purposes.

What is Student Directory Information?
Directory Information includes student name, addresses and telephone listings, birth date, major field of study, dates of attendance, enrollment status, degrees and awards received, participation in officially registered activities and sports, prior educational institutions, photographic image, and other similar information.

What information is not considered directory information?
Student Social Security Number, citizenship, gender, grades, GPA, and other similar items not specifically listed as directory information are not disclosed to “non-university officials” without prior written consent of the student.

When should privacy requests be submitted?
To be excluded from the annual printed USF Directory, your request for “Privacy” must be received by the Office of the Registrar on the Tampa campus by the end of the second week of classes in the Fall Semester. No public disclosures will be made until after this deadline. The Office of the Registrar will accept privacy requests throughout the year but assumes no responsibility for disclosures made prior to receipt of the request.

How long does my request last?
Privacy requests will become effective within 48 hours of receipt by the USF Registrar’s Office (Tampa) and will remain in effect until you have been awarded a degree from USF or until you have not been enrolled at USF for three consecutive semesters or you have provided written authorization to the Office of the Registrar requesting removal.

Please select one:

- [ ] I wish to be **removed** from privacy. I understand that this will allow complete disclosure of my directory information.
- [ ] I wish to request **complete privacy (i.e. non-disclosure)**. I understand that under this level of privacy no disclosures of directory information will be made about me and that my listing will not be included in Commencement and Honors programs, USF directories, and other publications or lists made available to the public.
- [ ] I wish to request **partial privacy that allows my name to be included in Commencement and Honors programs**. I understand that under this level of privacy, my listing will be excluded from USF directories and other publications or lists made available to the public.
- [ ] I wish to request **confidentiality to exclude my directory information from lists made available to the public**. I understand that under this level of privacy, **all** disclosures of my directory information are permitted and my listing will be included in Commencement and Honors programs and USF directories—except my name, address, and telephone information will not be provided in any electronic files, printed lists, or mailing labels made available to the public (e.g. non-university officials or agencies such as vendors, credit card companies, telemarketers, etc.) by the Office of the Registrar.

Signature: ____________________________  Date: ______________
AFFIDAVIT OF DEPENDENCY

______________________________ personally appeared before me,  
______________________________, a notary public in and for the County of  
_____________________________, State of______________, who makes a solemn oath that  
he/she was entitled to and did claim ________________________________  
(applicant/student)  
as a dependent person on his/her most recently filed federal income tax report and/or will claim same  
person on his/her current year’s federal income tax report. The affiant further swears that he/she  
contributed over one half of the applicant’s/student’s financial support for the calendar year  
_________.

Affiant hereby agrees to allow the University of South Florida to obtain from the Internal  
Revenue Service a copy of his/her claim.

Affiant hereby agrees to allow the University of South Florida to obtain from the Internal  
Revenue Service a copy of his/her federal income tax report for the years which will substantiate his/her  
claim.

______________________________
Signature of Affiant

Sworn to and subscribed before me this ______________ day of __________________, 20____.

________________________________________________________
Notary Public

My Commission expires: ____________________________________

Note: To be used when parent is requesting release of dependent student’s records (academic, fees, etc.). Attach copy of page one of federal income tax return form.
Responsibilities Associated With Access to University Data:

1. Data to which you have access in the conduct of legitimate University business may not be used for any other purposes, nor may it be passed on by you to any other person, in any form, for any purpose other than legitimate University business.

2. You are responsible for the security of the data to which you have access. This includes your adherence to University, College, Campus and departmental policies regarding access to data, keeping data, diskettes, and printouts in secure locations, periodically changing passwords, and ensuring your workstation is not accessible to others who do not have legitimate access to it when you are not physically present.

3. You are responsible for distinguishing between public, directory and confidential information. For guidance, see the USF catalog and USF Policy and Procedure 0-106. Confidential information regarding students or staff may not be released in any personally identifiable format without permissions of the individual. Individual directory information may be released unless a student has requested otherwise. Always check the privacy flag in student data before releasing directory information. Any public information may be displayed in either individual or aggregated format.

4. For consistency, official counts of students, employees and other items are developed or maintained by the Division of Institutional Research and Planning. Many of these are printed in the University Fact Book. It is your responsibility to use these official counts on surveys, news releases, grant proposals or other documents.

Your signature below indicates that you have read, and agree to comply with, the above Statement of Responsibility.

Requester Signature of Responsibility ___________________________________________________   Date __________________

If you currently have an Administrative Computing Logon ID, list here:

Responsibilities Associated With Access to University Data:

1. Data to which you have access in the conduct of legitimate University business may not be used for any other purposes, nor may it be passed on by you to any other person, in any form, for any purpose other than legitimate University business.

2. You are responsible for the security of the data to which you have access. This includes your adherence to University, College, Campus and departmental policies regarding access to data, keeping data, diskettes, and printouts in secure locations, periodically changing passwords, and ensuring your workstation is not accessible to others who do not have legitimate access to it when you are not physically present.

3. You are responsible for distinguishing between public, directory and confidential information. For guidance, see the USF catalog and USF Policy and Procedure 0-106. Confidential information regarding students or staff may not be released in any personally identifiable format without permissions of the individual. Individual directory information may be released unless a student has requested otherwise. Always check the privacy flag in student data before releasing directory information. Any public information may be displayed in either individual or aggregated format.

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Your signature below indicates that you have read, and agree to comply with, the above Statement of Responsibility.

Requester Signature of Responsibility ___________________________________________________   Date __________________

How to process this form:

1. Fill out all sections marked by bold border outline. Make sure to have appropriate signatures: requester must sign the statement of responsibility, Accountable Officer must sign to approve ID creation. Also mark Student/General Person access requested. Use the comments/special requests section to explain the access requirements of your specific job.

2. Access to specific areas in BANNER is based upon Access Classes within each module. The Primary Process Owner(s) for the module(s) will determine the names of the appropriate Access Classes based on your selections/comments above. Forward this form to the Primary Process Owner(s) for each BANNER module you require access to (see list of PPO's below).

3. PPO's should complete the bottom portion of the form.

Primary Process Owners for the BANNER Modules Listed:

- General Person
- General Student
- Schedule
- Catalog
- Academic History
- Permits
- Admission, Recruitment, Articulation
- Voice Response for Admissions
- Financial Aid, Voice Response for Financial Aid
- Accounts Receivable, Voice Response for Accounts Receivable
- Location Management
- Degree Audit (CAPP)
- Constituent/Organizations, USF Foundation Finance, Prospect (University Advancement)
- Finance General (USF Research Foundation)

Requested Access | Primary Process Owner Signature | Date | Circle Approved Databases | IT use only
---|---|---|---|---
PROD | PPRD | ALUM | DVLP
PROD | PPRD | ALUM | DVLP
PROD | PPRD | ALUM | DVLP
PROD | PPRD | ALUM | DVLP

STUDENT RECORDS MANUAL
Appendix 6

DISTRIBUTION LIST

Student Records Custodians
<table>
<thead>
<tr>
<th>Name</th>
<th>Department</th>
<th>Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dewey Holleman, Director</td>
<td>Admissions Office</td>
<td>SVC 1036</td>
</tr>
<tr>
<td>Drema Howard, Director</td>
<td>Career Resource Center</td>
<td>SVC 2088</td>
</tr>
<tr>
<td>William Anton, Director</td>
<td>Counseling Center</td>
<td>SVC 2124</td>
</tr>
<tr>
<td>Eric Walden, Comptroller</td>
<td>Purchasing and Financial Services</td>
<td>ADM 147</td>
</tr>
<tr>
<td>Leonard Gude, Director</td>
<td>Financial Aid Office</td>
<td>SVC 2124</td>
</tr>
<tr>
<td>Angela DeBose, Registrar</td>
<td>Office of the Registrar</td>
<td>SVC 1034</td>
</tr>
<tr>
<td>Harold Nixon, Assoc. Vice President</td>
<td>Student Affairs</td>
<td>ADM 151</td>
</tr>
<tr>
<td>Steven C. Specter, Director</td>
<td>Student Affairs/College of Medicine</td>
<td>MDC 0003</td>
</tr>
<tr>
<td>Michael S. Tooke, Coordinator</td>
<td>Student Employment</td>
<td>SVC 1102</td>
</tr>
<tr>
<td>Egilda Terenzi, Director</td>
<td>Student Health Services</td>
<td>SHS 100</td>
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**College Undergraduate Advising Coordinators/Representatives**

<table>
<thead>
<tr>
<th>Name</th>
<th>College</th>
<th>Office</th>
</tr>
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<tbody>
<tr>
<td>Kathy Cole</td>
<td>Arts &amp; Sciences</td>
<td>BEH 201</td>
</tr>
<tr>
<td>Myrtice Landers</td>
<td>Arts &amp; Sciences</td>
<td>BEH 201</td>
</tr>
<tr>
<td>Jackie Nelson</td>
<td>Business Administration</td>
<td>BSN 1406</td>
</tr>
<tr>
<td>Paulette Walker</td>
<td>Education</td>
<td>EDU 162</td>
</tr>
<tr>
<td>Kate Johnson</td>
<td>Engineering</td>
<td>ENC 1302</td>
</tr>
<tr>
<td>Carol Kerrigan</td>
<td>Fine Arts</td>
<td>FAH 120</td>
</tr>
<tr>
<td>Gabriela Vega</td>
<td>Nursing</td>
<td>MDC 22</td>
</tr>
<tr>
<td>Rolanda Washington Lewis</td>
<td>Undergraduate Studies</td>
<td>SVC 2011</td>
</tr>
<tr>
<td>Oliver Parsons</td>
<td>Project Thrust</td>
<td>FAH 120</td>
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**Regional Campus Undergraduate Advising Coordinators/Representatives**

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<thead>
<tr>
<th>Name</th>
<th>Campus</th>
<th>Office</th>
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</thead>
<tbody>
<tr>
<td>Willette Roach</td>
<td>Lakeland Campus</td>
<td>ADM 226</td>
</tr>
<tr>
<td>Pamela Doerr</td>
<td>Sarasota Campus</td>
<td>SAR/PMD</td>
</tr>
<tr>
<td>Beatrice Smith</td>
<td>St. Petersburg Campus</td>
<td>DAV 134</td>
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<tr>
<td>Cyndie Collins</td>
<td>St. Petersburg Campus</td>
<td>DAV 201A</td>
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## College Graduate Coordinators

<table>
<thead>
<tr>
<th>Name</th>
<th>Department</th>
<th>Office</th>
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</thead>
<tbody>
<tr>
<td>Alex Ratensky</td>
<td>Architecture</td>
<td>USF 30837</td>
</tr>
<tr>
<td>Wanda MacLean</td>
<td>Arts &amp; Sciences</td>
<td>SOC 107</td>
</tr>
<tr>
<td>Richard L. Meyer</td>
<td>Business</td>
<td>BSN 2102</td>
</tr>
<tr>
<td>Diane Briscoe</td>
<td>Education</td>
<td>EDU 123</td>
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<tr>
<td>Kate Johnson</td>
<td>Engineering</td>
<td>ENX 100</td>
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<tr>
<td>Carol Kerrigan</td>
<td>Fine Arts</td>
<td>FAH 120</td>
</tr>
<tr>
<td>Peter J. Fabri</td>
<td>Medicine</td>
<td>VAH112</td>
</tr>
<tr>
<td>Mary Walker</td>
<td>Nursing</td>
<td>MDC 0022</td>
</tr>
<tr>
<td>Elizabeth Gulitz</td>
<td>Public Health</td>
<td>MDC 0056</td>
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## Other University Staff

<table>
<thead>
<tr>
<th>Name</th>
<th>Department</th>
<th>Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lee Roy Selmon</td>
<td>Athletic Department</td>
<td>PED 214</td>
</tr>
<tr>
<td>Corey Johnson</td>
<td>Athletic Department</td>
<td>PED 214</td>
</tr>
<tr>
<td>Ed Steiner</td>
<td>Education</td>
<td>EDU 162</td>
</tr>
<tr>
<td>Terri Flateby</td>
<td>Evaluation and Testing</td>
<td>SVC 2054</td>
</tr>
<tr>
<td>Jody Adamchak</td>
<td>General Counsel</td>
<td>ADM 250</td>
</tr>
<tr>
<td>Judy Luedtke</td>
<td>New Student Orientation</td>
<td>SVC 2002</td>
</tr>
<tr>
<td>Carol Harneit</td>
<td>Educational Outreach</td>
<td>SVC 1072</td>
</tr>
</tbody>
</table>

## College Deans

<table>
<thead>
<tr>
<th>Name</th>
<th>Department</th>
<th>Office</th>
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<tbody>
<tr>
<td>Stephen Schreiber</td>
<td>Architecture</td>
<td>UTC 180</td>
</tr>
<tr>
<td>Kathleen Heide (Acting Dean)</td>
<td>Arts &amp; Sciences</td>
<td>CPR 107</td>
</tr>
<tr>
<td>Robert L. Anderson</td>
<td>Business Administration</td>
<td>BSN 3403</td>
</tr>
<tr>
<td>Colleen Kennedy</td>
<td>Education</td>
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</tr>
<tr>
<td>Louis Martin-Vega</td>
<td>Engineering</td>
<td>ENB 118</td>
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<tr>
<td>Ronald L. Jones</td>
<td>Fine Arts</td>
<td>FAH 110</td>
</tr>
<tr>
<td>David L. Shern</td>
<td>Florida Mental Health Institute</td>
<td>MHC 1118</td>
</tr>
<tr>
<td>Robert M. Daugherty Jr.</td>
<td>Medicine</td>
<td>MDC 0002</td>
</tr>
<tr>
<td>Patricia A. Burns</td>
<td>Nursing</td>
<td>MDC 0022</td>
</tr>
<tr>
<td>Laurence G. Branch</td>
<td>Public Health</td>
<td>MDC 0056</td>
</tr>
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</table>
STUDENT RECORDS MANUAL
Appendix 5

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Kathleen Moore   Educational Outreach   SVC 1072
TBA             Graduate School      FAO 126
Derrie Perez (Interim)   Tampa Campus Library   LIB 122
W. Robert Sullins   Undergraduate Studies    SVC 2002

Campus Deans

L. Preston Mercer   Lakeland Campus      ADM 226
Ralph Wilcox      St. Petersburg Campus   BAY  214
Peter French     Sarasota Campus         PMD 223

University Provost & Staff

Renu Khator       Interim University Provost   ADM 226
Catherine J. Batsche   Vice Provost         ADM 226
Tennyson J. Wright   Vice Provost         ADM 226
Philip L. Smith    Assistant Provost      ADM 226
Bernard Mackey      Associate Vice President   ADM 226
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Bibliography
