

STUDENTS

Student Records

Legal Names

Legal names must be used in school records to prevent confusion and to maintain the integrity of the records.

Legal surnames must be used in school records, and may not be changed for school purposes without a court order, except in the case of a student who marries and adopts a different surname.

Nicknames may be used in the place of given names in informal communications and may be noted on those official records that have the capacity to accept them. Nicknames in official records shall be designated by parentheses when used, e.g., Robert (Bob) Smith; Elizabeth Rachel (E.R.) Jones.

Proof of legal name will be required at registration. A birth certificate, social security card, military identification card, driver's license, passport, adoption decree, or court order changing or confirming a name is adequate proof of legal name.

A school records custodian who learns that a student's records use a name or names contrary to this procedure shall, after appropriate confirmation, correct the record.

Student records shall be managed by the District records custodian in the following manner:

Type of Records

Student records shall be divided into two categories, the cumulative folder and supplementary records.

Cumulative folders may contain all information about a student which is collected and maintained on a routine basis, such as identifying information (name, birth date, sex, common school identifier, year in school, address, telephone number, parent's name, ethnic classification, emergency information [parent's place of employment, family doctor, babysitter, siblings]); registration and attendance records including dates of entry and withdrawal; grades and other student progress reports; junior high school transcript; Official Student Record (state standardized high school transcript); results of tests of school achievement, aptitude, interests, hearing and vision; health and immunization status reports; records of school accomplishments and participation in school activities; suspension or expulsion notices or summary of suspensions and expulsions; and such other information as shall enable staff to counsel with students and plan

appropriate activities. Identifying information may be limited if the student is a participant in the state Address Confidentiality Program.

Supplementary records about a student may be collected and maintained in connection with special school concerns about the student, such as discipline files, confidential health information and reports connected with assessment and placement of a student who is formally identified as a “focus of concern;” reports from non-school persons and organizations such as physicians, psychologists and clinics, except for general screening purposes; reports pertaining to specific problems associated with the student; and current reports of psychological tests and progress reports related to a student’s disabling condition. All such reports included in records shall be dated and signed by the originator.

Working notes are not considered student records within the purview of this procedure. For the purpose of this procedure, working notes of staff are defined as those records about students that are maintained in the sole possession of the writer, are used only as a personal memory aid, and are not accessible or revealed to any other person except a substitute for that staff member.

Certificate of Immunization Status

High school graduates will be given their Certificate of Immunization Status upon graduation. No copy need be kept by the District.

Accessibility of Student Records

Information contained in the cumulative folder and/or supplementary records shall be provided to persons and agencies as follows:

Parents. Parents of a dependent student as defined by § 99.3 of Section 152 of the Internal Revenue Code of 1986 have the right to inspect the cumulative folder and/or supplementary records of their children unless the District has been provided with evidence that there is a court order or other legally binding document relating to such matters as divorce, separation, or custody that specifically revokes these rights. If a request for records is received from a person who is not listed as a parent on registration forms, the parent who registered the student will be contacted before records are provided.

1. The parent shall be provided analysis and interpretation by qualified staff of all information in the cumulative folder and supplementary records. This action may be initiated by the parent or a staff member. The review shall occur within 5 school business days after a request is received unless a written explanation for the failure to do so is supplied by the custodian of records. In no case shall the review occur later than 45 days after the request is made.
2. Inspection and review shall be conducted during normal working hours, unless the custodian of the record (principal or designee) consents to

other arrangements. Custodians shall provide assistance in the interpretation and analysis of student records as needed. Although records must remain within District control, they may be copied or reproduced for the parent of a dependent student or eligible student at his/her own expense.

The Student. Information from the cumulative folder shall be interpreted to the student upon his/her request. Information contained in supplementary records shall be interpreted to the student upon his/her request and with the consent of the parent. The eligible student may inspect his/her cumulative folder and supplementary records. "Eligible student" means a student who is at least eighteen years old or attending a postsecondary school. The right of access granted the parent or eligible student includes the right to be provided a list of the types of education records directly related to students maintained by the school and the District. The parent and eligible student shall have the right to inspect or to be informed of the content of any record containing personally identifiable information regarding more than one student, provided that the right to access shall apply only to that portion of the record or document that relates to the student. Upon graduation from high school, a student may request to receive a final transcript in addition to the diploma.

Staff. Staff who have a legitimate, educational interest in a student shall have access to the cumulative folder and any supplementary records without written consent from the parent or eligible student.

Other Districts. When a student transfers to another school district, that district shall be provided with records upon submitting a written request to the District. If the student has an outstanding fee or fine, the official transcript will not be released until the outstanding fee or fine is discharged. At the time of transfer of the records, the parent or eligible student may receive a copy of the records at his/her expense if requested and shall have an opportunity to challenge the contents of the records. Parents shall be advised that student records shall be released to another school where the student has enrolled or intends to enroll.

Other Persons and Organizations. Information contained in the cumulative folder and supplementary records of a student shall be released to persons and organizations other than the student, parent, staff, and other districts only with the written consent of the parent (for other than an eligible student) or eligible student, with the following exceptions:

1. Directory information may be released publicly without consent upon the condition that the parent of the student in attendance or eligible student in attendance is notified annually of the school's intention to release such information and be provided the opportunity to indicate

that such information is not to be released without prior consent. Directory information is information contained in the student's educational record that would not be considered harmful or an invasion

of privacy if disclosed. It includes the student's name, address, telephone number, electronic mail address, photograph, date and place of birth, dates of attendance, grade level, participation in officially recognized activities and sports, weight and height of members of athletic teams, diplomas and awards received, and the most recent previous school attended. The actual residential addresses of participants in the state Address Confidentiality Program will not be available for release as directory information.

- a. Student directory information will not be released in response to verbal, telephonic, or electronic requests except in an emergency.
 - b. Student directory information will be released only when authorized by an administrator.
 - c. Student directory information will not be provided if an administrator determines that the release of information is not in the best interest of the student or students about whom information is requested, unless the release is required by law.
 - d. Student mailing lists will be provided only when authorized as set forth in policy and procedure, and only to: (1) organizations created and operated for the benefit of Central Kitsap School District students, such as PTSAs; (2) institutions of higher learning; (3) recruiters for Washington National Guard and the federal military, as required by law; and, (4) providers of goods or services to students by contract with the school or school District, such as vendors of school rings, photography services, graduation announcements, caps and gowns, and graduation ceremony videotapes.
2. Pursuant to 20 U.S.C. 1232g, information may be released to authorized representatives of the comptroller general of the United States, the attorney general of the United States, the secretary of education of the United States, or state or local educational authorities in connection with the audit or evaluation of federal or state supported education programs or in connection with the enforcement of or compliance with the legal requirements for such programs. If the parent or eligible student has not given written authorization or federal law does not specifically authorize collection of personally identifiable information, such audit or evaluation must be conducted in such a manner as will not permit the personal identification of students and their parents by persons other than the representatives of such organizations, and such information shall be destroyed when no longer needed for the purpose for which it has been gathered.
 3. Information may be released to state and local officials to whom such information is specifically required to be reported or disclosed pursuant

to Washington State statute adopted prior to November 19, 1974 (examples: reporting child abuse or referrals to juvenile court for truancy).

4. Information may be released to organizations conducting studies for or on behalf of educational agencies or institutions for the purpose of developing, validating, or administering predictive tests, administering student aid programs, or improving instruction, if such studies are conducted in such a manner as will not permit the personal identification of students and their parents by persons other than the representatives of such organizations, and if such information shall be destroyed when no longer needed for the purpose for which it has been gathered.
5. Information may be released to accrediting organizations to carry out their accrediting functions.
6. Information may be released in compliance with a judicial order or lawfully issued subpoena, upon condition that a reasonable effort has been made to notify the parent or eligible student in advance of such compliance unless the court or issuing agency has ordered that the contents of the subpoena, order, or information responsive to it not be disclosed.
7. Information may be released to appropriate persons and agencies in connection with an emergency to protect the health or safety of the student or other persons.
8. A high school student may grant authority to the District to permit prospective employers to review the student's transcript. Students shall be advised at least annually that such request shall be honored only upon a release signed by the student.

Confidential Health Records

Confidential health records should be maintained separate from the cumulative file and stored in a secure area. Such records are also covered by the Family Education Rights and Privacy Act, unless state law provides stricter protection. There is a higher standard of confidentiality for records pertaining to HIV, sexually transmitted diseases, drug or alcohol treatment, mental health treatment, family planning, or abortion. Only students may authorize release of records concerning family planning or abortion, students thirteen years or older control access to drug, alcohol, or mental health treatment records and students fourteen years or older may deny or authorize access to records regarding HIV or sexually transmitted diseases. The releases for information regarding sexually transmitted diseases, HIV and drug or alcohol treatment are more restrictive than ordinary medical releases.

Record Keeping

When information from a student's record, other than directory information, is released to any person or organization other than authorized staff, a record of such release shall be maintained as part of the specific record involved. Telephone requests for information about students shall not be honored unless the identity of the caller is verified and the caller is authorized to receive the information under provisions of this procedure. A record shall be made of any such release of information and placed in the student's cumulative folder. This record of access shall include date of access, name of the party granted access, the basis on which access was granted, the purpose for which use of the records are authorized, and shall identify the record(s) provided.

Annual Notification

Schools and departments shall annually inform the parent of the student in attendance or eligible student in attendance of his/her rights regarding student records by providing notice of the following items:

1. Types of records maintained;
2. Name of custodian;
3. Person other than parent or eligible student having access to records and the purpose for such access;
4. Specification of criteria for determining who constitutes a school official and what constitutes a legitimate educational interest;
5. Inspection, review, amendment, and hearing rights and procedures to exercise those rights;
6. Concurrent rights of minor students;
7. Costs for copying records;
8. The District's procedure for forwarding education records to other schools that have requested the records and in which the student seeks or intends to enroll;
9. Directory information categories;
10. The right to opt out of disclosure of directory information; and
11. The right to file a complaint with the Family Policy Compliance Office, U.S. Department of Education.

Challenges and Hearings

At the time of inspection and review, the parent or eligible student granted access to records may challenge the appropriateness and accuracy of any record directly related to the student and may demand correction or deletion. The senior records custodian must authorize any such correction or deletion.

If the demanded correction or deletion is denied by the senior records custodian, the parent or eligible student may request a hearing before the superintendent to challenge the content of the student's education records on the grounds that information contained in the records is inaccurate, misleading, or in violation of the student's privacy rights. The hearing will be held within 10 school days of the receipt of such request. During the hearing the superintendent shall review the facts as presented by the parent or eligible student and the senior records custodian and decide whether or not to order the demanded correction or deletion. The superintendent shall send his/her written decision to the parent or eligible student within 10 school days of the hearing.

Upon denial of correction or deletion by the superintendent, the parent or eligible student may request in writing a hearing before the board, which hearing shall be conducted at its next regular meeting. During such hearing, which shall be closed to the public, the board shall review the facts as presented by the parent or eligible student and senior records custodian and decide whether or not to order the demanded correction or deletion. The board shall send its written decision to the parent or eligible student within 10 school days of the hearing.

Parents or eligible students challenging the appropriateness and accuracy of student records may insert a written explanation of their objections in such records. Such explanation must be maintained with the portion of the record to which it relates for as long as the record is maintained and must be disclosed whenever the contested portion of the record is disclosed.

Maintenance of Student Records

The student's principal or designee shall be the custodian of the cumulative folder. The principal or designee shall be the custodian of the supplementary records.

Records Custodians shall:

1. Maintain only those records authorized by these procedures.
2. Safeguard student records from unauthorized use and disposition.
3. Maintain access records.
4. Honor access requests for parents or eligible students.
5. Delete or correct records upon approval of the senior records custodian or upon order of the superintendent or the board.
6. Follow the records review schedule and procedures established by the senior records custodian.

Senior records custodians may assume the duties of custodians and shall:

1. Request student records from other schools.
2. Maintain security of student records.
3. Transfer, destroy, and expunge records as permitted.
4. Supervise activities of their custodians.
5. Conduct informal hearings and grant or deny approval of corrections or deletions requested by parents or eligible students.
6. Establish records review schedules and procedures for their respective schools or departments in accordance with procedures governing records disposition. (Psychological test scores shall be reviewed annually to determine their relevance to the continuing educational needs of the student.)
7. Upon transfer of the student to the next level (elementary to middle/junior high school, middle/junior high school to high school), or upon graduation or transfer outside the District, remove for retention, preservation, or destruction in accordance with applicable disposition procedures any records no longer pertinent to educational program placement.
8. Certify to the District records custodian by June 30 of each year the following:
 - a. Only records pertinent to educational program placement are being maintained, unless otherwise authorized by law, and
 - b. Required reviews have been accomplished.

The District records custodian shall provide overall supervision of student records management and control and shall enforce the student records policy and the administrative procedures.

Disposition of Student Records

The student permanent record shall serve as the record of the student's school history and academic achievement. Student permanent record information filed in the student's cumulative file is to be removed and retained permanently before disposal of the cumulative file five years after withdrawal/graduation. "Student permanent record" is defined as pupil cumulative card or equivalent (TIMMS Part A, Student Cumulative Record), junior high school transcript, and Official Student Record (state standardized high school transcript). When a student transfers to another school in the District, all records including the student permanent record information shall be transferred to the new school. When a student transfers to a school outside the District, the senior records custodian or his/her designee shall purge the student's cumulative file of all non-official, extraneous information and ensure the completed withdrawal form, the final transcript, and TIMMS reports (for elementary students) are included in the file before forwarding the file to the Student Records Archives Office. Upon receipt of a written request from the new school, the records specialist shall provide copies of the District's cumulative file records to the new school. Any records from non-District schools contained in the

cumulative file may be sent “as is,” without retaining a copy. If the student has an outstanding fee or fine, the official transcript will not be released until the outstanding fee or fine is discharged.

With the exception of the student permanent record information, the student cumulative file materials shall be destroyed five years after the student’s graduation or discontinuance of enrollment in the District. Prior to the destruction of records, the records specialist shall complete a destruction log including a description of all records destroyed, the date(s) of the records, the destruction date, the method of destruction, the records retention schedule authority number, and the signature of the records specialist.

Student records shall be destroyed by shredding and recycling of the shredded materials. Destruction logs shall be maintained permanently.

At the time a student for whom special education records are maintained graduates from school or ceases to need District special educational services, the parent or eligible student shall be informed that record information regarding the handicapping condition is no longer needed.

In informing the parent or eligible student of his/her rights regarding such records, the District shall advise the parent or eligible student that the information may be needed by the student or parent to establish eligibility for certain adult benefits, e.g., Social Security. At the parent’s or eligible student’s request, the record information relating to the handicapping condition shall be destroyed.

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