



ADMINISTRATIVE PROCEDURE

SAN DIEGO UNIFIED SCHOOL DISTRICT

NO: 6525

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CATEGORY: **Students, Records**

EFFECTIVE: **1-29-62**

SUBJECT: **Release of Directory-Type Student Information**

REVISED: **10-14-04**

A. PURPOSE AND SCOPE

1. To outline administrative procedures governing release of directory-type student information. Unless specified, general provisions of this procedure apply to all students.

2. **Related Procedures:**

Release of nondirectory-type student records.....	6527
Cumulative record keeping, K-6	6505
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Health records	6515
Student records, retention and destruction	6520
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Research projects involving the district, by students for advanced degrees and by nondistrict agencies and professional researchers	4930

B. LEGAL AND POLICY BASIS

1. **Reference:** Board policy: B-3700, F-6000, G-8000, H-8900, K-1500; Federal General Education Provisions Act, 20 U.S. Code 1232g; Education Code Sections 45345, 49060-49078, 51512; California Code of Regulations, Title 5, Section 435; Government Code Sections 6205 *et seq*; No Child Left Behind Act, 20 U.S.C. Sections 6301 *et seq*.
2. **California Confidential Address Program.** If parents or students indicate they are participants in the California Confidential Address Program (Cal CAP) during the registration process, refer to Procedure 6529 prior to the beginning of the registration process (Government Code Sections 6205 *et seq*).
3. **“Family Educational Rights and Privacy Act of 1974” (FERPA)** outlines requirements and limitations governing release of student information by school districts receiving federal funds; violations can result in withholding of such funds. The primary rights of parents/guardians under FERPA are:
 - a. The right to inspect and review education records.
 - b. The right to seek to amend education records.

- c. The right to have some control over the disclosure of information from education records.

These rights transfer to the student when the student turns 18 or attends a postsecondary institution (Procedure 6527).

C. GENERAL

1. **Originating Office.** Suggestions or questions concerning this procedure should be directed to the Standards, Assessment, and Accountability Division, Office of School Site Support.
2. **Definitions**
 - a. **Student information:** Any information contained in a student's education record (e.g., test scores, health records, enrollment, demographics) maintained by a school district in electronic (e.g., computer files, e-mail) or hard copy format (e.g., handwriting, print, tapes, film, microfilm).
 - (1) **Directory-type information:** Current information contained in a student's education record that would not generally be considered harmful or an invasion of privacy if disclosed. It includes, but is not limited to, the student's name, age, address, telephone listing, date and place of birth, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees and awards received, and the most recent previous educational agency or institution attended. (20 U.S.C. Code 1232g[a][5][A])
 - (2) **Nondirectory-type information:** Student information pertaining to a student's records that would generally be considered harmful or an invasion of privacy if disclosed (Procedure 6527). This includes information, such as assessment results, disciplinary and health records, and free and reduced meal eligibility.
 - b. **Personally identifiable information:** Any item of directory-type or nondirectory-type information that can be linked to or used to identify an individual student. Personally identifiable information includes, but is not limited to:
 - (1) Student's name.
 - (2) Name of the student's parent or other family member.
 - (3) Address of the student or student's family.

- (4) A personal identifier, such as the student's identification number or social security number.
 - (5) A list of personal characteristics that would make the student's identity easily traceable.
 - (6) Other information that would make the student's identity easily traceable.
- c. **Parent:** A natural parent, an adopted parent, or legal guardian. Whenever written consent is required for disclosure of information, the school may presume that the parent giving consent has authority to do so, unless the school has been provided with evidence that the parent does not have authority under law. For example, in the case of divorced parents, only the parent with legal custody may consent to release records, challenge content of a record, or offer written response to a record. The noncustodial parent does not need the consent of the custodial parent before inspecting and/or receiving a copy of the child's record.
- d. **Security of data:** Protection of confidential information in accordance with district policies. Security of data is the responsibility of all district employees who have access to confidential information.
- e. **Disclosure:** Granting access to, releasing, transferring, or otherwise communicating student information contained in education records to any authorized party, by any means, including oral, written, or electronic means.
- f. **Redisclosure:** Disclosure of student information received by an authorized individual or organization to any other individual or organization.
- g. **School-affiliated organization:** Any district-approved organization sponsored or endorsed by a district school that is authorized to receive directory-type information, and that will use such data for noncommercial purposes only, in support of the district's/school's educational goals.
3. **Disclosure of personally identifiable student information** without the consent of the parent/guardian or student is limited to specific, approved types of directory-type information to authorized individuals and organizations, as indicated in the following table. (For release of nondirectory-type information, see Procedure 6527.)

Individuals and Organizations Authorized to Receive Directory-Type Information^{1, 2} (Unless prohibited by parent/guardian; see C.4.c)	Student Information (Directory-Type)
Press, television, radio, and other news organizations	Name and address; height and weight of athletes; interview comments and photographs of students participating in athletics and other school activities; students receiving scholastic or other honors and awards
District-level PTA; teachers and other school officials; and law-enforcement agencies	Name and address; home telephone number of parent(s), if not unlisted
School-affiliated organizations (e.g., school foundations, school PTAs, School Site Councils) ³	Name and address; home telephone number of student's parent(s), if not unlisted, of students enrolled at the affiliated school
Employers or potential employers to whom a student has applied for employment	Name and address; birthplace; birth date; age
Military recruiters upon request (as required by federal <i>No Child Left Behind</i> legislation)	Name and address; telephone number of student's parent(s), if not unlisted, of secondary students
Civic and nonprofit organizations that wish solely to recognize and/or award students with high academic achievement (e.g., honor roll students, valedictorians, salutatorians)	Name and address; telephone number; enrollment status; degrees and awards received; and dates of attendance (see Procedure 6527 for release of nondirectory-type information)
Prospective grantors and financial institutions to which students have applied for financial aid	Name and address; telephone number; enrollment status; degrees and awards received; and dates of attendance (see Procedure 6527 for release of nondirectory-type information)

¹ **Note:** No charge shall be made for preparation or distribution costs since release of information is in the best interest of the student.

² Student information may not be redisclosed to any third party.

³ In the case of multiple schools affiliated with an organization, each school must authorize release of student directory-type information.

4. **Release of Directory-Type Information Without Parental Consent**

- a. **The district may disclose directory-type information** if it has given public notice to parents/guardians of students in attendance and eligible students in attendance at the district of:
 - (1) The types of personally identifiable information that the district has designated as directory-type information.
 - (2) A parent's/guardian's or eligible student's right to refuse to let the district designate any or all of those types of information about the student as directory-type information.
 - (3) The period of time within which a parent/guardian or eligible student has to notify the district in writing that he/she does not want any or all of those types of information about the student designated as directory-type information.
- b. **The district may disclose directory-type** information about former students without meeting the conditions in C.4.a.
- c. **As described in C.4.a, a parent/guardian**, or student aged 18 or over must be given an opportunity to request that student information be withheld. Notification of this right is accomplished annually through distribution of the "Facts for Parents" brochure (E.1). Parent/guardian must respond in writing to the child's school of attendance if directory-type student information is not to be released; this right to respond is also accorded to students aged 18 and over. The written request to withhold student information must be submitted annually.

5. **Release of Directory-Type Information by the Central Office or by a School**

- a. **The district department/division** that has custody of particular records has the authority to authorize the release of those records. To protect students' rights to confidentiality, the district department/division must be notified, either directly or by the school site, if a parent/guardian declines the release of the student directory information.
- b. **At a school site**, the principal or designee must approve the release of directory-type information. Information must not be given out unless (1) eligibility to receive information (C.3), and (2) identity of a requestor has been established.
- c. **District employees** charged with processing and releasing information (e.g., school secretaries, information technology staff) shall not release information in any form without the prior approval by a district official (e.g., school principal, director of communications) with authority to release directory-type information

from a student's record. A system to monitor and track requests, whether in hard copy or electronic form, must be maintained by the department or school releasing directory-type information (Section D).

D. IMPLEMENTATION

1. **Notification of Parent, Guardian, or Student Eighteen Years of Age or Over.** District notifies all parents/guardians annually about their rights concerning pupil records, and informing them of their rights to request that directory-type information for their student(s) be withheld. Notification is made through the "Facts for Parents" brochure issued by the Communications Department, Office of the Superintendent.
2. **Requests for Directory-Type Student Information.** Processors of information (e.g., Information Technology Department) shall not release student information without the prior authorization of the principal or manager—or designee—from the appropriate office
 - a. **Secretary or other employee** refers request to principal, manager, or designee.
 - b. **Principal, manager, or designee**
 - (1) Determines if requester is eligible to receive directory-type information as outlined in C.3. Directory-type information may be released provided written notice has not been filed withholding such consent (C.4).
 - (2) Verifies identity of requester and provides only the relevant information. All requests must be submitted in writing or in person. Principal, manager, or designee verifies credentials.
 - (3) If requester is not eligible or identity cannot be verified, explains basis for denying request.
 - (4) If there is doubt concerning eligibility to receive directory-type information, refers request to the Standards, Assessment, and Accountability Division.
3. **Parent/Guardian Nondisclosure Requests.** Parents/guardians have the right to request that directory-type student information not be released. When the school is notified in writing that a student's information should not be released, the school principal or designee must:
 - a. **Ensure the student enrollment** card reflects the parent/guardian request not to release directory-type information. This should be indicated as "no"

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in the section marked "Include in Student Directory Lists." A "no" in this section shall constitute a written request by parent/guardian to withhold release of directory-type student information.

- b. **Ensure the "Restricted Information"** field in the central district data system (i.e., Zangle) reflects parent/guardian request.
- c. **File the written request** in the student's cumulative record.

E. FORMS AND AUXILIARY REFERENCES

- 1. Facts for Parents brochure issued annually by the Communications Department, Office of the Superintendent.

F. REPORTS AND RECORDS

G. APPROVED BY

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