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RICHFIELD PUBLIC SCHOOLS

ADMINISTRATIVE GUIDELINES

ACCESS TO PUPIL RECORDS BY SCHOOL VOLUNTEERS

I. PURPOSE

The purpose of these administrative guidelines is to provide guidance regarding the access to private educational data by volunteers to facilitate their volunteer activities.

II. POLICY REFERENCE

Board Policy 581, Protection and Privacy of Pupil Records, provides in Section VI.B., paragraphs 14 and 22, that the school district may disclose personally identifiable information from student education records without consent of the parent or student if the disclosure is:

A. To volunteers who are determined to have a legitimate education interest in the data and who are conducting activities and events sponsored by or endorsed by the educational agency or institution for students or former students.

OR

B. To a contractor, consultant, volunteer, or other party to whom the school district has outsourced institutional services or functions provided that the outside party:

1. performs an institutional service or function for which the school district would otherwise use employees;
2. is under the direct control of the school district with respect to the use and maintenance of education records; and
3. will not disclose the information to any other party without the prior consent of the parent or eligible student and uses the information only for the purposes for which the disclosure was made.

III. DETERMINATION OF LEGITIMATE EDUCATIONAL INTEREST

A. The Chief HR and Administrative Officer is designated to determine which volunteers have a legitimate education interest in the data.

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- B. In making the determination, the following factors will be considered:
1. The interest must be a legitimate educational interest, based on the nature of the organization and the nature of the particular volunteer activity.
 - a. The following volunteer organizations and individuals are deemed to have an educational interest:
 - School parent organizations (e.g. PTO, PAG, PSE)
 - Booster groups (e.g. Band Boosters, interscholastic sports team booster groups)
 - RHS Senior Party Committee
 - Elementary room parents
 - Volunteers for other school-sponsored activities
 - b. Activities that support the school program or provide assistance to the school administration, teachers, coaches, and activity supervisors in carrying out school-related programs and activities are deemed to have an educational interest.
 - c. Activities such as assembling a directory for the purpose of parent or student networking are not deemed to have an educational interest.
 2. The volunteers must need the private data to assist them in conducting activities and events that are sponsored by or endorsed by the school district.
 - a. Following are examples of activities involving volunteer organizations and individuals that are sponsored or endorsed by the school district:
 - School or classroom field trips
 - School-wide events such as fun fairs and family nights
 - Vision and hearing screening
 - Kindergarten orientation
 - Curriculum nights, open houses, and parent / student orientations
 - School-wide testing
 - Trip to environmental learning center
 - End-of-season athletic team banquet
 - b. Following are examples of activities that are not sponsored or endorsed by the school district. In some cases, the district does not sponsor or endorse such activities for liability reasons.

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- Competition cheerleading
- Booster-organized activities such as a spring break trip to Florida to play in a baseball tournament
- Booster-organized parties other than the end-of-season athletic team banquet
- Global language trips
- Band / choir tours

c. Requests for private data by a volunteer organization should be determined on a case by case basis so that the district is able to consider whether the activity is one that is either sponsored or endorsed by the school district.

3. The volunteers must have a legitimate need for the information sought.

a. The private data sought must be directly relevant and necessary to perform the volunteer activity that has a legitimate educational interest

b. As an example, a volunteer may be granted access to student health and emergency information in order to help an activity supervisor check and organize student permission slips and health forms in preparation for a student trip.

c. By contrast, it would be inappropriate to provide health information to an athletic booster club for an unrelated purpose such as ordering athletic jerseys.

IV. RESPONSIBILITIES OF VOLUNTEERS

A. Volunteers who have access to private data shall use the data only for the purpose for which it was requested.

B. The data must not be discussed with or shown to others unless the other individual also has a legitimate educational interest in the data, or as otherwise permitted or required by law.

C. Wherever possible, private data must remain on school premises.

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