

STUDENT RECORDS

1. A cumulative record will be maintained for each pupil from his entrance into school through grade 12. Such records pertaining to the individual pupil may be used only for the benefit, promotion, or welfare of the pupil. Provisions will be used only for the benefit, promotion, or welfare of the pupil. Provisions will be made for including at least the following:
 - a. Personal and family data, including certification of name and date of birth (student identification number)
 - b. Test data, including aptitude, interest, personality, and social adjustment rating
 - c. Medical, psychological, case studies, and anecdotal reports
 - d. All achievement records, as determined by tests and teacher evaluation
 - e. Pupil questionnaires and records of conference
 - f. Copies of correspondence with parents and others concerning the pupil
 - g. Other records which may contribute to understanding of the pupil.
2. Regulations pertinent to the administration of student records will be established. These regulations will set out guidelines for student records in the following areas:
 - a. Purposes of student records
 - b. Kinds of records
 - c. Characteristics of student records
 - d. Access to records
 - e. Administration of records
3. All material in each cumulative record will be treated as confidential and will be shared only with the professional staff of the schools as appropriate; with the pupil's parents or guardian; or with a pupil 18 years of age or older. Such information demands judicious use and should always contribute to the welfare of the individuals under consideration. Upon the request of parents and at personal interviews with the parents, all tests will be translated into meaningful terms for their benefit, and emphasis will be placed upon the relationships of all known factors influencing the educational development of the pupil.
4. Individual pupil responses to tests or questionnaires administered to secure group, school, or school system data useful in research for program improvement will be anonymous and not made part of each pupil's record.
5. Confidentiality: Our schools can justify an invasion of student privacy only when the information collected will be used by the school in a way that is helpful to the student.

Sensitive information will be shared by the school only with the student, his parents, and those persons who will use the information for the professional purpose of helping the student.
6. Request to Amend Records: The parent of a student or an eligible student who believes that information contained in the educational records of the student is inaccurate or misleading or violates the privacy or other rights of the student may request that the educational agency or institution which maintains the records amend them.

A decision whether to amend the educational records of the student in accordance with the request will be made within a reasonable period of time upon receipt of the request.

7. Right to a Hearing: If the decision is to refuse to amend the education records of the student in accordance with the request, the school will so inform the parent of the student or the eligible student of the right to a hearing.

The parent or guardians of a student (or in the case of a student over the age of 18, the student himself), will have an opportunity for a hearing before the appropriate hearing officer as specified in administrative regulations to challenge the content of the student's school records to insure that the records are not inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student, and to provide an opportunity for the correction or deletion of any such inaccurate, misleading, or otherwise inappropriate data contained therein.

If, as a result of the hearing, the educational agency or institution decides that the information is not accurate, misleading, or otherwise in violation of the privacy or other rights of students, it will inform the parent or eligible student of the right to place in the educational records comments on any reasons for disagreeing with the decision of the agency or institution.

Any explanation placed in the educational records of the student under the preceding paragraph will:

- a. Be maintained by the educational agency or institution as part of the educational records of the student as long as the record or contested portion thereof is maintained by the agency or institution, and
 - b. If the educational records of the contested portion thereof is disclosed, the explanation will also be disclosed to that party.
8. Information Card: Name, address, telephone, and doctor and health history (per school nurse to avoid indiscriminate access).
9. Summary Forms: Reports of overall student progress to school board and community.
10. Student Record: Basic information, cumulative records, test card.
11. Cumulative Record: Grades, placement and general demographic information such as birthplace, data, vaccination, parents' or guardians' names, parents' places of employment, race, proof of age and citizenship, attendance data, previous school history.
12. Testing: All 2's will be found on testing card; the rest in appropriate areas.

Normative	(2)
Diagnostic	(2)
Testing precis	(2)
Interest inventories	(2)
Early identifications	(2)

Group I.Q. individual I.Q.	(3)
Self-concept	(3)
Learning disability	(3)
Personality inventories (precis)	(3)
Written personality	(4)
Neurological	(4)
Projective personality	(5)
Additional student information	
Autobiography	(2)
Home and community information	(2)
Personal goals	(2)
Census card	(2)
Parent/teacher conference reports	(2)
Parent communications	(2)
Student accounting forms	(2)
Registration forms	(2)
Classification forms	(2)
Separation and transfer forms	(2)
Parent reporting form	(2)
Reporting forms	
College	(3)
Employer	(3)
Clinic reports (5) precis	(3)
Sociometric form	(4)
Anecdotal record	(5)
Case studies	
Counselor	(5)
Administrator	(5)
Social worker	(5)
Psychologist	(5)

13. Characteristics of Student Record

- a. Cumulative
 - (1) periodic reviews will occur as to individual and systemwide cumulative records
- b. Uniform
 - (1) for purposes of spatial economy
 - (2) facilitating cumulative and comparative studies
- c. Durable
 - (1) permanence for system
- d. Compact
 - (1) ease of reproduction
 - (2) adaptability to change
 - (3) control and usability
- e. Usable
 - (1) assigned authorizations
 - (2) color coding
 - (3) geographic location(s)
- f. Complete

- (1) verification process of periodic internal checks
- g. Accurate
 - (1) see above

14. Access to Records: Student record data ranges from tentative to highly stable. The variety of data collected requires differing arrangements for security and access.

Previously, the accessibility factor in student records has been delineated (in section II of the state plan) in relation to individual data. Regarding this area of student records, the following regulations will be followed:

- a. The supervisor of special education is designated as the professional person responsible for record maintenance and the integrity of the accessibility policy. Regarding the guidelines established, this person will also give periodic training to the education staff focusing on security, with an emphasis on the privacy rights of parents and students.
- b. A sign-in-and-out system will be used by everyone at all student records locations in which the name, address, relationship, and record item(s) being reviewed by date and time will be recorded. (See sample form entitled "Record of Inspection of Pupil Records.")
- c. Precautions are required to protect the rights of the student against infringement of privacy, misinterpretation of data, and inappropriate use.
- d. Access to an interpretation of student records in Levels 1 and 2 will be available through the counselor, the principal, and the supervisor of special education.
- e. Computerized data presents problems in terms of security and confidentiality. Provisions should be made to secure all confidential material by the management information system coordinator and the appropriate project and/or school administrator.
- f. Data falling within Levels 1, 2, and 3 may be released without parental permission to those who have a legitimate educational interest. Written forms will be required stating reasons for requesting such data. These will be available to parents and school officials responsible for record maintenance as a means of auditing the system.
- g. Data within Levels 4 and 5 require parental permission for release.
- h. Data found in other levels may not be divulged except with parental written consent if appropriate. If desired, a copy of such data will be forwarded to the parent.
- i. The school department will comply with judicial orders (subpoenas) or validated orders of relevant administrative agencies. Parents of students will be notified of compliance with all such orders.
- j. A student reaching age 18 and no longer attending school or married (age 18 or not) must give his or her consent regarding the release of data requiring authorization –parental consent form.
- k. Personally-identifiable information from the educational records of a student may be disclosed to appropriate parties in connection with an emergency without the prior written consent of the parent of the eligible student if knowledge of the information is necessary to protect the health or safety of the student or other individuals. The factors to be taken into account in determining whether personally-identifiable information from the educational records of a student may be disclosed will include the following:

- (1) The seriousness of the threat to the health or safety of the student or other individuals
- (2) The need for the information to meet the emergency
- (3) Whether the parties to whom the information is disclosed are in a position to deal with the emergency
- (4) The extent to which time is of the essence in dealing with the emergency.

I. Paraprofessionals may have access to those records associated with their specific function but must always be accompanied by professional interpretation.

15. Administration of Records: The responsibility for the administration of records lies with the following designated administrators:

central records	-- supervisor of special education
individual building	-- building principal
special areas	-- special area administrators

These individuals are responsible for the administration of records in their respective areas according to the guidelines set out in the student records policy.

16. Appeal Process: The following appeal process will be operable regarding questionable requests of parental access and challenges over the content of student-school records:

- a. The immediate school administrator will be notified. Every attempt will be made at this level to resolve the difficulty, including the use of professional personnel available to the school department.
- b. Failing resolution on Level 1, the supervisor of special education will be notified. His responsibility will be to review the request and prior actions under Level 1. He will make decisions regarding the validity of requests.
- c. Failing resolution by the supervisor of special education, the superintendent will review the written transcript and render a decision in writing. Steps 1, 2, and 3 will not take more than five school days.
- d. The School Committee is the next level of appeal.
- e. The commissioner of education is the next level of appeal.

17. Removal of Material on Appeal: Should the ruling administrator find the contested student record information inaccurate or misleading, it is to be corrected or expunged. In the event that data is removed from the record, it will be returned to the supplying agency if generated outside of the school department. If generated from within, it must be destroyed. Notification will be made in writing to the parents or guardian of the student or to the eligible student.

If, as a result of the hearing, the educational agency or institution decides that the information is not inaccurate, misleading, or otherwise in violation of the privacy of the rights of the students it shall inform the parent or eligible student of the right to place in the educational records of the student a statement commenting upon the information in the educational records and/or setting forth any reasons for disagreeing with the decision of the agency or institution.

Any explanation placed in the educational records of the student under the preceding

paragraph will:

- a. Be maintained by the educational agency or institution as part of the educational records of the student as long as the record or contested portion thereof is maintained by the agency or institution, and
 - b. If the educational records of the student or the contested portion thereof is disclosed by the educational agency or institution to any party, the explanation also will be disclosed to that party.
18. Violation of Regulations: Compliance with these guidelines is deemed of the highest priority and, therefore, a violation thereof will be dealt within the appropriate professional manner.
19. Training and Staff Development: Annually, orientation sessions must be held for staff on these procedures.
20. Purpose of Student Records
- a. To provide product data for graduation, admission, transfer, promotion and ongoing placement, and to preserve data for use at a later time.
 - b. To provide a developmental profile of an individual's growth.
 - c. To help staff evaluate student progress to enable students and their parents or guardians to monitor this progress.
 - d. To fulfill state law regarding attendance and financial aid.
 - e. To provide cumulative data for program improvement, research and evaluation, and systemwide approval.
 - f. To relate evidence of pupil growth to the school's statement of purposes (philosophy and goals).
 - g. To accrue data about pupil personnel services for purposes of evaluation and long-term needs.
21. Kinds of Reports and Accessibility: Parents or legal guardians will have access to all student records on their child.

Other persons within and without the school department will have to demonstrate a bona fide need to know based on the above purposes and, if approved, have counselor or other professional interpretation. This includes outside evaluators.

The numerical weights placed on each piece of the following data ranging from 1 (most accessible) to 5 (least accessible) are based primarily on the need to know of the individual(s) seeking the information.

The personnel having access to each level are:

Levels 1, 2 and 3: Records in categories 1, 2, and 3 will be made available to all professional school department personnel in the educational divisions with a legitimate educational interest in the student. Should a question arise as to a staff member's legitimate educational interest, the appeals process description must be employed. Counselor or other professional interpretation should be provided at Level 3.

File: JO-R

Level 4: Categories of persons responsible for generating the data, except as otherwise provided by parental consent.

Level 5: Same as level 4 with provision that data remain with person(s) generating the data, except as otherwise provided by parental consent.

(Sample)

RECORD OF INSPECTION OF PUPIL RECORDS

Date: _____

Records Examined: _____
(Name of pupil or pupils)

Records Examined by: _____

Purpose: _____

Adopted: January 24, 1994