

CHELTENHAM SCHOOL DISTRICT
ADMINISTRATIVE REGULATION

206 STUDENT RECORDS

DEFINITIONS

Student means any individual who is or has been in attendance at Cheltenham School District (“the District”) and for whom the District maintains records.

Parent means a parent of a student, and includes a natural parent, a guardian, or an individual legally acting as a parent of a student in the absence of a parent or guardian (i.e. surrogate parent).

Directory information includes the following information relating to a student: the student/family members’ name, address, telephone number, electronic mail address, photograph, date and place of birth, years of attendance, grade level, participation in officially recognized activities and sports, weight and height of members of athletic teams, degrees, honors and awards received, the most recent previous educational agency or institution attended by the student, and other similar information.

Directory information does not include a student’s Social Security Number, grades, status as a student with special needs, or any other information that is not specifically identified in this paragraph.

Directory information may include a student identification (ID) number or personal identifier as long as the ID number or identifier cannot be used to gain access to educational records without another factor (such as a PIN or password) possessed only by the authorized user.

Directory information may be disclosed for purposes beneficial to the student and the District only with the approval of the Superintendent or designee.

Destruction means the physical destruction or permanent removal of personally identifying data from the education records of a student so that the information in those records is no longer personally identifiable.

Disclosure means permitting access or the release, transfer, or other communication of personally identifiable information contained in education records of the student orally or in writing, or by electronic means, or by any other means to any party except the party identified as the party that provided or created the record.

Educational agency means any public or private agency to which the Family Educational Rights and Privacy Act (“FERPA”) applies.

Education records (or Student records) includes student records as defined in FERPA, as amended. (See Attachment A).

Eligible student means a student who has attained eighteen (18) years of age or is attending an institution of post-secondary education. In the case of a dually enrolled student, the District and the postsecondary institution at which the student is enrolled may exchange relevant information on the student. If the student is under eighteen (18) years of age, the parents still retain the rights under FERPA at the District and may inspect and review any records sent by the postsecondary institution to the District.

Electronically stored information (ESI) includes, but is not limited to emails and other electronic documents. The possible sources/locations of ESI include, but are not limited to, individual hard drives, local and remote servers, cloud-based storage, and removable media and devices used to conduct District business.

Personally identifiable information includes, but is not limited to the name of the student, the student's parent or other family member; the address of the student or student's family; a personal identifier, such as the student's social security number or biometric record; other indirect identifiers, such as the student's date of birth, place of birth, and mother's maiden name; other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or information requested by a person who the District reasonably believes knows the identity of the student to whom the education record relates.

Biometric record, as used in the definition of "personally identifiable information," means a record of one or more measurable biological or behavioral characteristics that can be used for automated recognition of an individual. Examples include fingerprints, retina and iris patterns, voiceprints, DNA sequence, facial characteristics, and handwriting.

School officials refer to persons employed by the District as an administrator, supervisor, teacher, or support staff member (including health or medical staff and law enforcement unit personnel); a Board member; a person or company with whom the District has contracted to perform a special task (such as an attorney, auditor, medical consultant or therapist); or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A contractor, consultant, volunteer, or other party to whom the District has outsourced District services or functions may be considered a school official under certain circumstances.

Legitimate educational interest means needed in order for the school official to fulfill his or her designated professional responsibilities.

ANNUAL NOTIFICATION OF RIGHTS (See Attachment B)

The District shall give parents of students in attendance or eligible students in attendance at the District annual notice by such means as are reasonably likely to inform them of their rights under FERPA including the following:

1. The right to inspect and review the student's education records.

2. The right to seek amendment of the student's education records that the parent or eligible student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights.
3. The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.
4. The right to file with the Department of Education a complaint concerning alleged failures by the District to comply with FERPA.

The notice must include all of the following:

1. The procedure for exercising the right to inspect and review education records;
2. The procedure for requesting amendment of records; and
3. The specific criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

The Superintendent or designee shall provide for effective notification of parents/guardians of students with disabilities or eligible students with disabilities, as well as for those parents identified as having a primary or home language other than English.

ADMINISTRATION OF SECURITY

Each building principal is responsible for the management of student records. Annually, the building principal or designee will review all aspects of the this Administrative Regulation and the accompanying Board Policy with his/her staff.

All student records shall be properly stored and secured when not in use. Records stored electronically will be maintained in a secure database with access limited to those individuals with a legitimate educational interest.

PARENT ACCESS RIGHTS

Parents, as defined above, have a right, in the presence of a school official, to inspect, review and copy educational records relating to their child when the record is collected, maintained or used by the District.

Parents wishing to inspect, review or copy such records should submit a written request to the school principal or designee that identifies the record(s) they wish to inspect, review or copy. The District shall comply with a proper request within a reasonable period of time, but not exceeding 45 days after the request is received.

If circumstances effectively prevent the parent from exercising the right to inspect and review the student's education records, the District shall:

1. Provide the parent with a copy of the records requested; or
2. Make other arrangements for the parent to inspect and review the requested records

The District may charge a fee for a copy of an education record unless the imposition of a fee effectively prevents a parent or eligible student from exercising their rights. **(See Attachment D)**

The right to inspect, review or copy education records includes:

1. The right of a parent to request and receive from the District a reasonable explanation and interpretation of information contained in the education records of the child; and
2. The right of a parent to designate a representative who will inspect, review or copy the records.

If an education record of a student includes information on more than one child, the parent or eligible student may inspect and review or be informed of only the information relating to their child. A parent has the right to copy from or receive a copy of an education record originally containing information on more than one child, but prior doing so, the District shall delete, remove or remove from the record or its copy any personally identifiable information concerning any child who is not the child of the parent.

In cases involving separation, divorce, or custody in which the law views both parents as legal guardians, both the parent with whom the child resides and the parent with whom the child does not reside enjoy the same rights and privileges regarding review of and access to student records absent a court order to the contrary.

In case of divorce, unless there are extenuating or limiting circumstances, both natural parents retain the legal right to review of student records. In cases where the divorce decree limits the rights of the non-custodial parent with respect to visitation or knowledge of the child, the non-custodial parent shall be denied access to the child's records. The burden to produce the court order to deny access is on the parent seeking to deny access. In order to protect the interests of the District, when a divorced non-custodial parent requests access to a child's records, and there is no court order or other legally binding document denying access on file, that parent may be requested to complete a Records Access Affidavit. The completed affidavit shall be retained in the student's file.

STUDENT ACCESS RIGHTS

Whenever a student becomes an eligible student, as defined above, the rights accorded to and the consent required of the parent of the student under FERPA shall thereafter be accorded to and required of only the student.

ACCESS TO / DISCLOSURE OF RECORDS

The District shall keep an access record of each individual, organization or agency other than school officials, as defined above, that requests access to and each disclosure that is made of personally identifiable information from the education records of each student. The access

record shall include the name of the party, the date access was given and the legitimate interests for which the party was allowed to use the records.

Personal information shall only be transferred to a third party on the condition that such party will not permit any other party to have access to such information without the written consent of the parents of the student or as permitted by law.

In the event that the District discloses personally identifiable information from an education record with the understanding that the party receiving the information may make further disclosures as authorized by FERPA or other applicable law, the access record shall include the names of the additional parties to which the receiving party may disclose the information on behalf of the District, and the legitimate interests which each of the additional parties has in requesting or obtaining the information.

The following parties shall have the right to inspect and review the access record: (1) the parents(s) or eligible student; (2) the school official or their assistant(s) who are responsible for the custody of such records; and (3) those parties authorized by FERPA for the purposes of auditing the recordkeeping procedures of the District.

Written parental consent shall be obtained before education records or personally identifiable information contained therein is released to any party unless one or more of the exceptions listed in § 99.31 of the FERPA regulations applies. Examples of the exceptions under which prior consent is not required to disclose information include but are not limited to the following:

1. Directory information, if the District has given public notice to parents of students in attendance and eligible students in attendance of:
 - a) The types of personally identifiable information that the agency or institution has designated as directory information;
 - b) A parent'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 information; and
 - c) The period of time within which a parent or eligible student has to notify the District in writing that they do not want any or all of those types of information about the student designated as directory information. **(See Attachment B.)**

The District may disclose directory information about former students without complying with the notice and opt out conditions above. However, the District must continue to honor any valid request to opt out of the disclosure of directory information made while a student was in attendance unless the student rescinds the opt out request.

A parent or eligible student may not use the right above to opt out of directory information disclosures to prevent an educational agency or institution from disclosing or requiring a student to disclose the student's name, identifier, or institutional e-mail address in a class in which the student is enrolled.

The District may not disclose or confirm directory information without meeting the written consent requirements if a student's social security number or other non-directory information is used alone or combined with other data elements to identify or help identify the student or the student's records.

2. The disclosure is to other school officials whom the District has determined to have legitimate educational interests. A contractor, consultant, volunteer, or other party to whom the District has outsourced District services or functions may be considered a school official provided that the outside party performs a District service or function for which the District would otherwise use employees; is under the direct control of the District with respect to the use and maintenance of education records; and is subject to the requirements of FERPA governing the use and re-disclosure of personally identifiable information from education records. The District must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate education interests.
3. The disclosure is to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer upon condition that:
 - a. the District must make a reasonable attempt to notify the parent or eligible student of the disclosure at the last known address of the parent or student unless:
 - i. the disclosure is initiated by the parent or eligible student; or
 - ii. the District includes in its annual notification that the District forwards education records to other agencies or institutions that have requested the records and in which the student seeks or intends to enroll or is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer.
4. The records have been subpoenaed by a judicial authority, but only if the District makes a reasonable effort to notify the parent or eligible student of the order or subpoena in advance of compliance so that the parent or eligible student may seek protective action, unless the disclosure is in compliance with a subpoena and the court or other issuing agency has ordered that the existence or contents of the subpoena or the information furnished in response to the subpoena not be disclosed.
5. The disclosure is in connection with a health or safety emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals. The District may take into account the totality of the circumstances pertaining to a threat to the health or safety of a student or other individuals. In the event that the District discloses personally identifiable information from education records of a student under the health or safety emergency exception outlined in FERPA, the District shall further record the articulable and significant

threat to the health or safety of the student or other individuals that formed the basis for the disclosure.

6. A state or local child welfare agency caseworker or other representative is permitted to have access to the student's education records without having to obtain parental consent or a court order. This exception applies to children for whom the public child welfare agency has legal responsibility for their care and protection, specifically those children in the legal custody of the agency who are placed in out-of-home care. Proof of the relationship with the child must be provided. (Uninterrupted Scholars Act (Public Law 112-278))

Special Procedures Regarding Student Disciplinary Records

Each principal or designee shall keep and retain records of student disciplinary actions.

The District shall disclose a student's disciplinary records as follows:

1. Whenever a District student transfers to another school entity or nonpublic school, a certified copy of the student's disciplinary record shall be transmitted to the school entity or nonpublic school to which the student has transferred, upon written request by the school entity or nonpublic school to which the student has transferred. The disciplinary record shall be supplied to the receiving school within ten (10) days from receipt of the written request to supply a certified copy of the student's disciplinary record. The requirements of this section apply as well to transfers between schools within the District. The District shall maintain required records concerning adjudicated students and transfer students disciplined for offenses involving weapons, alcohol, drugs and violence, including sexual assault, on school property.
2. In the event that the District reports a crime committed by a child with a disability, the District must ensure that copies of the special education and disciplinary records of the child are transmitted for consideration by the appropriate authorities to whom the District reports the crime but only to the extent permitted by FERPA and this regulation.
3. All other requests for disciplinary records, including records requested by post-secondary institutions, will not be disclosed without written parental/guardian consent.

MAINTENANCE/DESTRUCTION OF DATA IN EDUCATION RECORDS

Information no longer relevant to and necessary for the provision of educational services to the student shall be destroyed as delineated in the Student Records Retention Chart (**See Attachment C**). The timelines listed in Attachment C reflect minimum retention periods. The District shall make a good faith effort to periodically and systematically review and destroy records as contemplated in Attachment C; however, nothing in this Administrative Regulation shall be construed as a guarantee that every applicable record will be destroyed on the exact date on which the minimum retention period has been satisfied. Furthermore, the District may retain

a written record of a student's name, address, telephone number, grades, attendance records, classes attended, grade level completed and year completed indefinitely.

Notwithstanding the minimum retention periods listed in Attachment C, the District will comply with any court order directing the expungement or destruction of student records upon the terms and conditions outlined in such court order.

Any student records not specifically identified on the chart shall be referred to the Assistant Superintendent for review.

The destruction of records of students with disabilities is subject to the following conditions, as well as those outlined in **Attachment C**:

1. The District shall inform the parents of a student with a disability when personally identifiable information in the records of the student is no longer relevant to and necessary for the provision of educational services to the student, and as a result, will be destroyed. Parents shall be provided notice of their right to receive a copy of the material to be destroyed prior to its destruction.
2. The District shall not destroy education records containing information necessary for the education of a student who is enrolled or has been enrolled in an education program operated by the District.
3. The District shall maintain records needed for a financial or programmatic audit of any program receiving Federal funding for three years after the completion of the activity for which the funding was used.

RIGHT TO REQUEST AMENDMENT OF EDUCATION RECORDS

The parent of a student or an eligible student who believes that information contained in the education records of the student is inaccurate, misleading or otherwise in violation of the student's privacy may request in writing that the District amend the record.

The District shall decide whether to amend the education records of the student within a reasonable period of time after receipt of the request. The building principal shall initially decide whether to amend the record in accordance with the request of the parent. If the principal declines to amend the record(s) in accordance with the request of the parent, the parent shall be informed of the refusal and the specific reasons for the refusal. The parent shall also be notified in writing of their right to request and receive a hearing to challenge the decision of the school principal.

The District shall, upon proper parent request, provide an opportunity for a hearing in order to challenge information in education records if the parent alleges that the information is inaccurate, misleading or otherwise in violation of the privacy rights of their child. The hearing shall be conducted in accordance with the following:

1. The hearing shall be held within a reasonable time after the request has been received.

2. Notice shall be given to the parent or eligible student of the date, time, and place of the hearing, reasonably in advance of the hearing.
3. The hearing shall be conducted by an individual, who may be a school official , who does not have a direct interest in the outcome of the hearing.
4. The District shall give the parent or eligible student a full and fair opportunity to present evidence relevant to the issue(s) raised. The parent or eligible student may, at their own expense, be assisted or represented by one or more individuals of their choice, including an attorney.
5. The District shall make its decision in writing within a reasonable period of time after the hearing.
6. The decision must be based solely on the evidence presented at the hearing, and must include a summary of the evidence and the reasons for the decision.

Parents may not use the FERPA records amendment hearing process to challenge a grade, opinion, or substantive decision made by the District about a student. FERPA was intended to require that schools conform to fair recordkeeping practices, and not to override the accepted standards and procedures for making academic assessments, disciplinary rulings, or placement determinations. Thus, while FERPA affords parents the right to seek amendment to education records that contain inaccurate information, this right cannot be used to challenge a grade or an individual's opinion, or a substantive decision made by a school about a student. Additionally, if FERPA's amendment procedures are not applicable to a parent's request for amendment of education records, the District is not required to hold a hearing on the matter.

If, as a result of the hearing, the District decides that the information is inaccurate, misleading or otherwise in violation of the privacy rights of the student, it shall amend the education records of the student accordingly and so inform the parent of the student or the eligible student in writing.

If, as a result of the hearing, the District decides that the information is not inaccurate, misleading or otherwise in violation of the privacy rights of the student, it shall inform the parent or eligible student of the right to place in the education records of the student a statement commenting upon the contested information in the education records and/or setting forth any reason for disagreeing with the decision of the District, or both. Any explanation placed in the education records of the student shall be maintained by the District as part of the education records of the student for as long as the record or contested portion thereof is maintained by the District. If the education records of the students or the contested portion thereof are disclosed by the District to any party, the explanation shall also be disclosed to that party.

Nothing in this Administrative Regulation shall be interpreted to mean that the parent and the District may not, by mutual agreement, meet prior to a parent request for a hearing or the hearing itself to discuss the concerns of the parent regarding the accuracy or inaccuracy of the records of the student and to reach a resolution.

COMPLAINT PROCEDURE

The District shall inform parents of students or eligible students of their right to file a complaint regarding possible violations of their rights accorded them by the Family Educational Rights and Privacy Act of 1974. This complaint shall be submitted in writing to the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202.

LEGAL HOLD PROCEDURES

When a matter is likely to lead to litigation by or against the District, a “legal hold” will be placed requiring that education records, including ESI, relating to the matter, incident, person or entity, be retained by the District until such time as the legal hold is lifted, regardless of minimum retention periods that would dictate otherwise.

Because of the variety of matters that could lead to litigation by or against the District, the responsibility to identify such matters rests with District employees. Principals and other supervisors are responsible for informing staff whom they supervise of their responsibilities to report items covered by a legal hold.

When a District employee has reason to believe that a matter may give rise to potential litigation, that employee shall:

1. Advise immediate supervisor, building supervisor, or appropriate central administrator of the matter and, if requested by the supervisor, prepare a written report stating what the individual saw and/or heard, the names of the people and entities involved and the names of any witnesses; and
2. Preserve education records relating to the matter, pending a determination regarding whether a legal hold is necessary.

The administrator shall forward a written report to the Superintendent or designee, who, in consultation with the Solicitor, will determine whether to place a legal hold on education records, including ESI, relevant to the incident(s).

If a legal hold is implemented, the Superintendent or designee shall direct the appropriate administrator(s) to make all reasonable efforts to retrieve and maintain any archived ESI before that data is purged and to further prevent potentially relevant records from being purged or deleted.

The Superintendent or designee shall direct the appropriate administrator(s) to advise District employees involved with the incident(s) or matter(s) at issue to retain all documents, data and information regarding the matter including, but not limited to email communications, text messages, notes, letters and voice mail messages pending further notice.

If a matter is settled or resolved or the relevant statute of limitations has run out or it otherwise becomes apparent that litigation is not likely to arise, then the Superintendent or designee, in connection with the Solicitor, will release the legal hold and the retained and stored documents may then be disposed of in accordance with the District’s ordinary document retention policies.

ATTACHMENT A

Excerpt from Family Educational Rights and Privacy Act

Education Records

The term means those records that are:

1. Directly related to a student; and
2. Maintained by an educational agency or institution or by a party acting for the agency or institution.

The term does not include:

1. Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record.
2. Records of the law enforcement unit of an educational agency or institution, subject to the provisions of §99.8 of FERPA.
3. Records relating to an individual who is employed by an educational agency or institution, that:
 - Are made and maintained in the normal course of business;
 - Relate exclusively to the individual in that individual's capacity as an employee; and
 - Are not available for use for any other purpose.
4. Records relating to an individual in attendance at the agency or institution who is employed as a result of his or her status as a student are education records and not excepted under this definition.
5. Records on a student who is 18 years of age or older, or is attending an institution of post-secondary education, that are:
 - Made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in his or her professional capacity or assisting in a paraprofessional capacity;
 - Made, maintained, or used only in connection with treatment of the student; and
 - Disclosed only to individuals providing the treatment. For the purpose of this definition, "treatment" does not include remedial educational activities or activities that are part of the program of instruction at the agency or institution; and

- Records created or received by an educational agency or institution after an individual is no longer a student in attendance and that are not directly related to the individual's attendance as a student.
- Grades on peer-graded papers before they are collected and recorded by a teacher.

**Cheltenham School District
2000 Ashbourne Road
Elkins Park, PA 19027
215-886-9500**

ANNUAL NOTIFICATION OF RIGHTS PERTAINING TO STUDENT RECORDS

Student Records

The Family Educational Rights and Privacy Act (FERPA) affords parents and students who are 18 years of age or older ("eligible students") certain rights with respect to the student's education records. Please refer to Board Policy and Administrative Regulation 206 (Student Records), which are accessible on the District's publicly accessible website at <https://www.cheltenham.org/Page/402> or by contacting the District at the above address and phone number for specifics of the District's procedures including but not limited to the classification, maintenance, destruction, and disclosure of student records. A summary of these rights follows:

(1) The right to inspect and review the student's education records within 45 days of the day the District receives a request for access.

Parents or eligible students should submit to the school principal a written request that identifies the record (s) they wish to inspect. The principal will make arrangements for access and notify the parent or eligible student of the time and place where the records may be inspected.

(2) The right to request the amendment of the student's education records that the parent or eligible student believes are inaccurate, misleading, or in violation of the student's right to privacy.

Parents or eligible students may ask the District to amend a record that they believe inaccurate, misleading, or in violation of the student's right to privacy. They should write the school principal, clearly identify the part of the record they want changed, and specify why it is inaccurate, misleading, or in violation of the student's right to privacy.

If the District decides not to amend the record as requested by the parent or eligible student, the District will notify the parent or eligible student of the decision and advise them of their right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the parent or eligible student when notified of the right to a hearing.

(3) The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.

One exception which permits disclosure without consent is disclosure to school officials with legitimate educational interests. A school official is a person employed by the District as an administrator, supervisor, teacher, or support staff member (including health or medical staff and

law enforcement unit personnel); a Board member; a person or company with whom the District has contracted to perform a special task (such as an attorney, auditor, medical consultant or therapist); or a parent or student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A contractor, consultant, volunteer, or other party to whom the District has outsourced District services or functions may be considered a school official under certain circumstances.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibility.

The District discloses educational records without consent to officials of other agencies or institutions that have requested the records and in which the student attends or seeks or intends to enroll so long as the disclosure is for purposes related to the student's enrollment or transfer upon conditions as specified in FERPA and in District regulation. A student is considered to attend an agency or institution if the student is either enrolled in or receives services from the agency or institution.

(4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the District to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Directory Information

FERPA requires the District, with certain exceptions, to obtain your written consent prior to the disclosure of personally identifiable information from your child's education records. However, the District may disclose appropriately designated information (known as "directory information") without your written consent, unless you notify the District in writing within 20 days of the date you receive this notice that you do not want any or all of those types of information about the student designated as directory information. Directory information includes the following information relating to a student: the student's name, address, telephone number, date and place of birth, participation in officially recognized activities and sports, degrees and awards received, and the most recent previous educational agency or institution attended by the student. Directory information may be disclosed for purposes beneficial to the student and the District only with the approval of the District Superintendent or his/her designee. A parent or eligible student may not use the right above to opt out of directory information disclosures to prevent an educational agency or institution from disclosing or requiring a student to disclose the student's name, identifier, or institutional e-mail address in a class in which the student is enrolled.

ATTACHMENT C**RECORD RETENTION SCHEDULE**

<u>Type of Record</u>	<u>Retention Period</u>	<u>Disposal</u>
Electronic Student Records – Not Special Education Student	Six (6) years after the student is no longer of school age.	Destroy in confidential/secure manner
Paper Student Records – Not Special Education Student	Five (5) years after the last date of enrollment.	Destroy in confidential/secure manner
Electronic Student Records – Special Education Student	Six (6) years after the student is no longer of school age.	Destroy in confidential/secure manner
Paper Student Records – Special Education Student	Six (6) years after the student is no longer of school age.	Destroy in confidential/secure manner

Note: Notwithstanding the above, a student's high school transcript, which may include information such as a the student's name, address, phone number, grades, attendance record, classes attended, grade level and year completed may be retained indefinitely. The District also may retain indefinitely student information contained in the District's student information system/database.

ATTACHMENT D

SCHEDULE OF FEES

Unless the imposition of a fee effectively prevents a parent or eligible student from exercising the right to inspect and review the student's education records, the District may charge a fee for a copy of an education record which is made for the parent or eligible student. The Superintendent, or his/her designee, may waive fees that total less than \$10.

Fees for copying will be charged according to the following fee schedule which shall be periodically updated.

Copying costs

Paper copying charge

\$0.25 per page

Electronic records copied to native media

Actual Cost of conversion to paper

If a record is only maintained electronically or in other non-paper media, duplication fees shall be limited to the lesser of the fee for duplication on paper or fee for duplication in the original media unless the requester specifically requests for the record to be duplicated in the more expensive medium.