



UNIVERSITY POLICY

SUBJECT:	STUDENT AFFAIRS	TITLE:	REQUESTS FOR UNIVERSITY-WIDE AND SCHOOL/PROGRAM-WIDE INDIVIDUALLY IDENTIFIABLE STUDENT INFORMATION		
CATEGORY: Check One	Board of Trustees <input type="checkbox"/>	Presidential <input checked="" type="checkbox"/>	Functional <input type="checkbox"/>	School/Unit <input type="checkbox"/>	
Responsible Executive:	Vice President for Academic Affairs		Responsible Office:	Academic Affairs	
CODING:	00-01-25-05:01	ADOPTED:	03/10/00	AMENDED:	08/03/10

LAST REVIEWED: 08/03/10

I. PURPOSE

Set the policy and procedures for requests for University-wide and School/program-wide individually identifiable student information. This policy does not cover requests for information about an individual student; such requests are covered by University policy, Family Educational Rights and Privacy Act, 00-01-25-05:00.

II. ACCOUNTABILITY

Under the direction of the Executive Vice President for Academic and Clinical Affairs, the Vice President for Academic Affairs and the Deans shall implement and ensure compliance with this policy.

III. DEFINITIONS

- A. The data custodian of School/program-wide individually identifiable student information is the School Registrar or Admissions Officer and/or the pertinent Associate Dean, as designated by each school.
- B. The data custodian of University-wide individually identifiable student information or of information about students in more than a single School or program is the Vice President for Academic Affairs, in consultation with the University Registrar, the University Admissions Coordinator, the Director of Financial Aid, School/program data custodian(s), and/or others as appropriate.

IV. REFERENCES

- A. The Family Educational Rights and Privacy Act (FERPA)(1974) as amended.
- B. Family Educational Rights and Privacy Act [00-01-25-05:00](#)

V. POLICY

- A. Release of individually identifiable student data to requestors within or external to the University must be approved by the pertinent data custodian (see DEFINITIONS) according to the procedures described below.
- B. Release of individually identifiable student information is subject to the provisions of the Family Educational Rights and Privacy Act (FERPA) of 1974 and its subsequent amendments, and each data custodian is responsible for observing the restrictions under this Act and for observing

University policy, Family Educational Rights and Privacy Act, 00-01-25-05:00. Data custodians may release individually identifiable student information only when the requestor has demonstrated legitimate educational interest and need for the information. It is the responsibility of the data custodian to assess the legitimacy of the request and to deny any request that does not meet such criteria. At the discretion of the data custodian, any request may be denied for business or other reasons.

- C. All requests for individually identifiable student information must be accompanied by a confidentiality agreement (see EXHIBIT), signed by an appropriate individual.

VI. PROCEDURE

<u>Performed By</u>	<u>Action Taken</u>
Requestor	1. Prepares written request outlining in detail the reason why the information is being requested and the use to which it will be put, the data elements needed, the School(s) or program(s) involved, the point(s) in time for which the information is to be provided, and who will receive or be privy to the information.
Requestor	2. Signs the Confidentiality Agreement. See EXHIBIT.
Requestor	3. Submits request and signed Confidentiality Agreement to the pertinent data custodian (see DEFINITIONS).
Data custodian	4. If data custodian is Vice President for Academic Affairs, refers request to Director of Student Information Systems Support (SISS) for technical review. OR If data custodian is School official (see DEFINITIONS), may refer request to Director of SISS for technical review; otherwise approves or disapproves request (go to step 7). OR Returns request for additional information or clarification.
Director of SISS	5. Conducts a technical review of the request for Vice President for Academic Affairs or for School official if desired, including an estimate of the resources needed to comply with the request. Forwards request and technical review to the Office of Academic Affairs Student Information Workgroup if Vice President for Academic Affairs is data custodian, or to School official if that individual is data custodian and has requested a technical review. (Office of Academic Affairs Student Information Workgroup is composed of Vice President for Academic Affairs, University Registrar, Director of Student Information Systems Support, Director of Institutional Research, University Admissions Coordinator and University Director of Student Financial Aid.)

<u>Performed By</u>	<u>Action Taken</u>
Office of Academic Affairs Student Information Workgroup	6. Reviews the request and the technical review and makes a recommendation to the Vice President for Academic Affairs (chair of Workgroup).
Data custodian	7. Approves or disapproves the request and returns copy to requestor. An expiration date may be assigned to indicate that additional requests will be necessary or “until further notice” may be used to indicate repeated requests will be approved to same requestor. Approval may be contingent upon the requestor agreeing to cover the costs of implementing the request and/or may require an annual renewal of the terms of the request for release of individual student information on a recurring basis.
Data custodian	8. Complies with approved request, or forwards request to Director of SISS for assistance with implementation, or forwards request to Vice President for IST for implementation. OR Returns disapproved requests to the requestor.

VII. EXHIBIT

Confidentiality Agreement

By Direction of the President:

Vice President for Academic Affairs

EXHIBIT

CONFIDENTIALITY AGREEMENT

to accompany

REQUESTS FOR UNIVERSITY-WIDE AND SCHOOL/PROGRAM-WIDE
INDIVIDUALLY IDENTIFIABLE STUDENT INFORMATION
(University Policy #00-01-25-05:01)

I, _____, _____, _____
(name) (title) (UMDNJ office/department/school or name of external organization)

agree that the information I receive about UMDNJ students will be kept strictly confidential and will be used ONLY for the purposes stated in the attached request. I also agree that access to student names and/or other student personal information will be limited to those individuals with a *bona fide* need for that information. Once used for the purpose requested, the data will be returned to the provider or discarded in a secure manner. I further agree that the information will not be sold, given or transmitted in any way to any external individual, institution, company or entity without the express permission of the Vice President for Academic Affairs of UMDNJ. Release of information to a third party, once approved, will be subject to the same laws, regulations and policies as is the release to the primary requestor.

I understand that unauthorized disclosure of this information or other violation of this agreement or policy may subject UMDNJ employees to disciplinary action.

Signed: _____

Print Name: _____

Date: _____

UMDNJ Signature: _____

Agreement Expires: _____