

Guidelines on Administrative Regulations for Board Policy AF – Student Data Privacy College Application Tools

BACKGROUND

These guidelines are intended to address questions regarding the approval of technology applications used to facilitate students' application to institutions of higher education.

Section IV.A of the [Administrative Regulations](#) states: "All requests for technology applications that require the submission of Personally Identifiable Information and/or acceptance of a user agreement shall be submitted for approval as per procedures established by the ITRT. Approval must be provided prior to use." Tools such as "The Common Application," "Universal College Application," "Coalition Application," and "SendEDU," include both components that would require approval. These tools are unique in that they are used by colleges and/or students to streamline the college application process.

While [Board Policy AF – Student Data Privacy](#) and the corresponding regulations provide for the protection of personally identifiable student information in technology applications, it is not the only policy to address student records. The [Administrative Regulations for Board Policy JR – Disclosure of Directory Information](#) specifically address the disclosure requirements for Personally Identifiable Information to "school officials or other school systems, outside of the LEA, in which the student seeks to or intends to enroll." The regulations, in alignment with the Family Educational Rights and Privacy Act (FERPA; [20 U.S.C. § 1232G](#); [34 CFR PART 99](#)), permit the disclosure of education records without consent in this circumstance, provided that the school system includes notice of this exception in its annual notification.

Carroll County Public Schools' annual notice, included on page 62 of the [2017-2018 Informational Calendar](#) states, "Personally Identifiable Information is released without the written consent of the parent...to school officials of another school or another school system in which the student seeks or intends to enroll. This practice is reiterated in the "Transcripts" section of the [Student Services Manual](#).

The *Student Services Manual* clarifies, "A student desiring to have a transcript sent to a school official, employer or other person outside of Carroll County Public Schools shall complete a Transcript Request Form and submit it to the school counseling office at least two weeks in advance of the date the transcript is to be sent."

The following guidelines reconcile any perceived or actual discrepancy between the two sets of regulations.

GUIDELINES

Tools of this nature can be approved for staff and teacher use to enable the transfer of student records, including letters of recommendation, to institutions of higher education if the following conditions are met:

- The request for the release of student records must be initiated, in writing, by the student or the student's parent. The written request may be made electronically through the application.
- Upon request, a copy of the records disclosed shall be provided to the student or parent, with the exception of letters of recommendation when an appropriate FERPA waiver has been completed by the student.
- Staff are not permitted to direct or compel students to engage in the use of the tools.
- Staff may encourage students to use tools the students need to meet their post-secondary educational goals and, upon request, provide students support on the use of the tools.