

INSTRUCTION COUNCIL

MINUTES

Thursday, January 20, 2022

Zoom <https://zoom.us/j/96284911705>

9:00 a.m. – 10:30 a.m.

In attendance: Laurie Beets, Larry Burns, Aaron Christensen, Cynda Clary, Andrew Doust, Richard Frohock, Jeff Hartman, Diane Jones, James Knecht, Marlys Mason, Christine Ormsbee, Rita Peaster, Kyndal Roark, Adrienne Sanogo, Randy Seitsinger, Candace Thrasher, Jean Van Delinder, Missy Wikle and Chris Francisco, Chair.

1. Proposed Updates to FERPA Notice and OSU Policy 2-0701 (vote required) – Rita Peaster

The issue being addressed is the ease of sending OSU transcripts back to high schools for OSU's concurrent high school students. OSU has held a very conservative interpretation of FERPA, erring on the side of student privacy. FERPA has a provision that allows OSU to send transcripts to institutions in which our students are currently enrolled or intend to enroll. Currently, we can only send the transcripts to the other institutions if we indicate this updated information in our annual FERPA notice to students.

In addition to the updated FERPA notice the Policy 2-0701 should be updated to add consistency. Being able to send these transcripts to high schools of concurrent students will be helpful because it will eliminate tension between OSU and the high school counselors who have grown to expect transcripts from other institutions across the state. For further detailed information regarding the FERPA Notice and OSU Policy 2-0701, please refer to pages 6-13 of this document.

Motion was made by A. Sanogo and seconded by R. Seitsinger to accept the proposed policy changes described in the attached FERPA Notice and OSU Policy 2-0701 document, and Instruction Council approved.

2. Curriculum

1) Information Item Only:

2) Course Actions Summaries:

Education and Human Sciences

HDFS 5160		Master's Creative Component		1-6 LEC	1-6 IS	Change in credit hour configuration.
-----------	--	-----------------------------	--	---------	--------	--------------------------------------

Motion was made by R. Frohock and seconded by A. Doust to accept the above-mentioned Education and Human Sciences course action, and Instruction Council approved.

College of Engineering, Architecture and Technology

CHE 4002		Chemical Engineering Laboratory I		Present Prerequisite: CHE 3013, CHE 3333, CHE 3473, ENGL 1113, ENGR 1111, and STAT 4033 with grades of C or better.	Proposed Prerequisite: CHE 3013, CHE 3333, CHE 3473, ENGL 1113, ENGR 1111, ENSC 3231, and STAT 4033 or STAT 4073 with grades of C or better.	Change in Prerequisites. Effective: Summer 2022.
----------	--	-----------------------------------	--	--	---	---

Motion was made by A. Sanogo and seconded by C. Clary to accept the above-mentioned College of Engineering, Architecture and Technology course action, and Instruction Council approved.

3) Program Modifications:

College of Arts and Sciences

Bachelor of Science in Environmental Geoscience (New)

New program request

The College of Arts and Sciences proposes a Bachelor of Science in Environmental Geoscience to provide students with an Earth science background who wish to contribute to the environmental issues of the economy in state and nation.

Master of Arts in Political Science (171) *Tabled for further discussion*

Change of Program Name

- Change name from Political Science to Politics and Policy Studies
- The proposed name change is requested to better reflect the relationship between political science and public policy.

Degree requirement change

- Remove GRE requirement for admission
- The proposed change is requested to remove barriers for prospective students.

Course requirement change

- Require either POLS 5403 or POLS 5203
- Add POLS 5613
- Add non-thesis track
- Remove 6 hours of advanced topic courses
- Require 12 hours of guided electives
- The proposed changes are requested to allow students to tailor the curriculum to their career goals.
- No new courses will be added and no courses will be deleted.
- Total credit hours will not change.

Motion was made by M. Mason and seconded by C. Clary to accept the above-mentioned College of Arts and Sciences, Bachelor of Science in Environmental Geoscience new program request, and Instruction Council approved. The Master of Arts in Political Science was tabled for further discussion.

College of Education and Human Sciences

Doctor of Philosophy in Community Health Sciences (New)

New program request

The College of Education and Human Sciences proposes a Doctor of Philosophy in Community Health Sciences to provide advanced-level community health scholars and practitioners who increase the quality of life for individuals by utilizing evidence-based practices, social justice frameworks, and cultural competence. The degree currently exists as an emphasis area within the Doctor of Philosophy in Health, Leisure, and Human Performance with an option in Health and Human Performance.

Graduate Certificate in Gerontology (261)

Program deletion

- The proposed program deletion is requested effective immediately due to a lack of student enrollment. Students opt to enroll in the Master of Science in Aging Studies program.
- No students are currently enrolled.

Doctor of Philosophy in Human Sciences (123)

Option reinstatement

Reinstate option in Design, Housing, and Merchandising

Master of Science in Nutritional Sciences (098)

Option deletion

- Delete option in Dietetics
- The proposed change is requested because a Master of Science in Dietetics was approved and the option is no longer needed.

Graduate Certificate in Substance Abuse Counseling (285)

Existing program online delivery

The College of Education and Human Sciences requests online delivery of the existing Graduate Certificate in Substance Abuse Counseling. Online delivery will provide flexibility for current and prospective students to earn the certificate while completing a graduate degree or working in the counseling field.

Motion was made by M. Mason and seconded by A. Doust to accept the above-mentioned College of Education and Human Sciences program requests, and Instruction Council approved.

College of Engineering, Architecture and Technology

Bachelor of Science in Architectural Design Studies (New)

New program request

The College of Engineering, Architecture and Technology proposes a Bachelor of Science in Architectural Design Studies to provide students with an understanding of issues central to architectural design.

Master of Science in Civil Engineering (048)

Degree requirement change

- Consider admission for students who have completed a Bachelor of Science in engineering, engineering technology, science or mathematics.
- Remove GRE requirement
- The proposed changes are requested to make the admission criteria less restrictive.

Motion was made by A. Sanogo and seconded by J. Van Delinder to accept the above-mentioned College of Engineering, Architecture and Technology program requests, and Instruction Council approved.

Spears School of Business

Doctor of Business Administration in Business Administration (New)

New program request

The Spears School of Business proposes a Doctor of Business Administration in Business Administration to provide a practitioner-focused doctoral degree to business leaders so they are better equipped to lead their organizations.

Doctor of Philosophy in Business Administration (036)

Course requirement change

- Option in Accounting
 - Remove ECON 5223 and STAT 5203
 - Add ECON 6323 or AGECE 5103
 - Add AGECE 5403 as alternate to ECON 6013
 - Add STAT 5013
 - The proposed changes are requested to update curriculum related to recent course changes.
- Option in Executive Research
 - Remove MSIS 6100, MKTG 6413, and MGMT 6363
 - Add MGMT 6553, MSIS 6300, BADM 6913, and EEE 6343
 - Increase hours for BADM 6100 from 3 to 9 credit hours
 - Remove 6 hours of guided electives
 - Reduce dissertation from 15 to 12 credit hours
 - The proposed changes are requested to update the curriculum and align requirements with current plans of study for students in the program.
- Option in Hospitality Tourism and Management
 - Remove HTM 6111
 - Add HTM 5112
 - Reduce electives from 17 to 16 credit hours
 - The proposed changes are requested due to recent departmental structural modifications.
- No new courses will be added and one course will be deleted.
- Total credit hours will not change.

Master of Science in Business Analytics and Data Science (505)

Course requirement change

- For all options (from required core courses)
 - Remove MSIS 5633
 - Add MSIS 5663
- For Advanced Data Science option (from required option courses)
 - Remove MSIS 5663
 - Add MSIS 5633
- The proposed changes are requested based on advisory committee feedback.
- No new courses will be added and no courses will be deleted.
- Total credit hours will not change.

Motion was made by J. Van Delinder and seconded by C. Clary to accept the above-mentioned Spears School of Business program requests, and Instruction Council approved.

Center for Health Sciences

Doctor of Philosophy in Biomedical Sciences (002)

Degree requirement change

- Remove GRE requirement for admission
- The proposed change is requested to remove barriers for prospective students.
- No new courses will be added and no courses will be deleted.
- Total credit hours will not change.

Graduate Certificate in Healthcare Compliance (New)

New program request

The Center for Health Sciences proposes a Graduate Certificate in Healthcare Compliance to provide students with knowledge regarding healthcare laws and compliance.

Motion was made by A. Doust and seconded by M. Mason to accept the above-mentioned Center for Health Sciences program requests, and Instruction Council approved.

3. Other – Current COVID Information

- a. Given the high case counts and high positivity we have seen throughout the region, it was safe to assume a positive case in almost every class on campus. With that in mind, administration made the decision to continue with the protocol of either online classes, in person with masks, or hybrid for the first two-week period of the Spring 2022 semester. There have been scattered emails across campus with students protesting the use of masks in classrooms but nothing significant. For the remainder of the semester, classes are to return to normal with the COVID protocol in place should a student or instructor tests positive for COVID. We need to be cognizant of the fact that our instructors may contract COVID or be exposed or have childcare issues related to COVID. Public schools are not requiring masks and therefore transmission has created a problem for many of our instructors. We need to be as flexible as we possibly can.
- b. The 12-31-21 email from the Office of the President listed the updated CDC changes in quarantine / isolation guidelines. Significant confusion surrounds the category “tested positive, asymptomatic or symptoms resolving within 5 days” as many of our students are still suffering symptoms well past 5 days after testing positive. Evidence suggests that a COVID patient can be infectious for longer than 5 days. C. Francisco expressed his desire to have students quarantine until symptoms resolve.
- c. If a student has tested positive for COVID and is not feeling well even after the standard quarantine timeframe, they should be accommodated.
- d. University Health Services is an excellent source for those concerns from students / faculty / staff that cannot be easily answered by the COVID information distributed by OSU administration.

Meeting adjourned at 9:32am

Minutes were recorded by K. Roark

Proposed Updates to OSU’s Annual FERPA Notification and OSU Policy 2-0701

Prepared by the Office of the Registrar, January 2022

Summary

This proposal outlines minor updates to our annual FERPA notification to students and to OSU’s FERPA policy 2-0701 to utilize an option available in FERPA for institutions to disclose education records to another school where the student is already enrolled for purposes related to the student’s enrollment or transfer. Taking advantage of this provision within FERPA will help OSU ensure compliance with Oklahoma state statute on concurrent high school enrollment and significantly reduce manual efforts expended to collect and record consent from each concurrent student. Our annual FERPA notification also needs to be updated to include elements required by federal law, and our FERPA policy lacks clarity on when non-directory information may be disclosed in response to requests from off-campus parties.

Overview

Oklahoma statute §70-628.13.E indicates that school districts shall provide academic credit for all concurrent higher education courses (see Attachment A).

OSU’s historical stance on sending official transcripts to school districts of concurrent high school students is to only send transcripts when the request is initiated by the student. This practice is problematic for high schools, concurrent student advisors, and ensuring compliance with Oklahoma statute.

FERPA’s exceptions to prior signed consent §99.31(a)(2) include a provision for disclosure of student education records to another institution where the student seeks or intends to enroll, or where the student is already enrolled (see Attachment B). The related section on conditions for disclosing records to other institutions §99.34(a)(1) indicates that when education records are disclosed to another institution under §99.31(a)(2), it is not necessary to notify the student when:

- (i) The disclosure is initiated by the student, or
- (ii) The institution’s annual FERPA notification to students under §99.7 includes a notice that the institution forwards education records to other institutions 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.

Our annual FERPA notice (see Attachment C) needs to be updated to include procedures for students to inspect and review or request an amendment to their records, as outlined in §99.7(a)(3). Additional updates are reflected to align the definition of “school official” with OSU’s FERPA policy.

OSU’s FERPA Policy 2-0701 (see Attachment D) only mentions release of records without student consent to school officials with legitimate educational interest and doesn’t reference other §99.31(a)(2) exceptions to disclosure without student consent. We recommend updates to section 2.05 to clarify when non-directory information may be disclosed in response to requests from off-campus parties, and to reference signed consent exceptions consistent with the annual FERPA notice to students.

Discussion/Approval Record

Committee/Council	Date Approved
Directors of Student Academic Services	
Instruction Council	
Faculty Council Academic Standards & Policies Committee	
Faculty Council	
Council of Deans and Provost	
President/Executive Team	

Attachment A – Oklahoma Statute §70-628.13

§70-628.13. High school students - Concurrent enrollment in college or university courses - Tuition waiver.

A. 1. The Oklahoma State Regents for Higher Education, in cooperation with the State Board of Education, shall actively encourage the concurrent enrollment in college or university courses of eligible high school students on high school campuses, on college and university campuses and via online courses.

2. The State Regents and State Board shall establish concurrent enrollment requirements with an emphasis on determining course readiness and take all necessary actions to ensure the availability of concurrent enrollment opportunities to students in all Oklahoma high schools.

B. The State Board of Education in cooperation with the Oklahoma State Regents for Higher Education shall prepare promotional materials explaining the requirements, features and opportunities of concurrent enrollment and shall ensure that the independent school districts distribute the materials to each student prior to enrollment for each year of high school.

C. No institution of The Oklahoma State System of Higher Education shall deny enrollment in any course to any otherwise eligible high school student, or student of at least thirteen (13) years of age who is receiving high-school-level instruction at home, who meets the requirements of concurrent enrollment, nor shall any independent school district prohibit any student who meets the requirements of concurrent enrollment from participating.

D. 1. Each high school senior who meets the eligibility requirements for concurrent enrollment shall be entitled to receive a tuition waiver equivalent to the amount of resident tuition for a maximum of eighteen (18) credit hours in their senior year.

2. Subject to the high school senior concurrent enrollment program being fully funded, each high school junior who meets the eligibility requirements for concurrent enrollment shall be entitled to receive a tuition waiver equivalent to the amount of resident tuition for a maximum of nine (9) credit hours in their junior year, subject to the availability of funds.

3. Tuition waivers provided pursuant to this section shall be granted without any limitation on the number of waivers granted in any year other than the amount of funds available for the program and the number of eligible applicants.

E. **When a student earns college credit through concurrent enrollment, school districts shall provide academic credit for any concurrently enrolled higher education courses that are correlated with the academic credit awarded by the institution of higher education.** Academic credit shall only be transcribed as elective credit if there is no correlation between the concurrent enrollment higher education course and a course provided by the school district.

F. On or before December 1 of each year, the Oklahoma State Regents for Higher Education shall issue an annual report on the concurrent enrollment program implemented pursuant to this section. The annual report shall include but not be limited to the following information:

1. The number of students participating in concurrent enrollment;

2. The number of students participating in concurrent enrollment who received tuition waivers pursuant to subsection D of this section;

3. The high school graduation rate of students described in paragraphs 1 and 2 of this subsection; and

4. The number of students described in paragraphs 1 and 2 of this subsection who earned an associate's degree or a bachelor's degree at an institution of higher education. The annual report shall be posted on the websites of the Oklahoma State Regents for Higher Education and the State Department of Education.

Added by Laws 1971, S.J.R. No. 38, p. 1034, § 13, emerg. eff. June 17, 1971. Amended by Laws 1977, c. 131, § 1, emerg. eff. June 3, 1977; Laws 1988, c. 91, § 1, emerg. eff. March 29, 1988; Laws 1989, c. 299, § 4, emerg. eff. May 24, 1989; Laws 2005, c. 432, § 11, eff. July 1, 2005; Laws 2009, c. 129, § 1, eff. July 1, 2009; Laws 2018, c. 236, § 1, eff. July 1, 2018.

Attachment B - FERPA Excerpts (<https://studentprivacy.ed.gov/node/548/>)

§99.31 Under what conditions is prior consent not required to disclose information?

(a)(2) The disclosure is, subject to the requirements of §99.34, 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.

Note: Section 4155(b) of the No Child Left Behind Act of 2001, 20 U.S.C. 7165(b), requires each State to assure the Secretary of Education that it has a procedure in place to facilitate the transfer of disciplinary records with respect to a suspension or expulsion of a student by a local educational agency to any private or public elementary or secondary school in which the student is subsequently enrolled or seeks, intends, or is instructed to enroll.

§99.34 What conditions apply to disclosure of information to other educational agencies or institutions?

(a) An educational agency or institution that discloses an education record under §99.31(a)(2) shall:

(1) Make a reasonable attempt to notify the parent or eligible student at the last known address of the parent or eligible student, unless:

(i) The disclosure is initiated by the parent or eligible student; or

(ii) The annual notification of the agency or institution under §99.7 includes a notice that the agency or institution 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;

(2) Give the parent or eligible student, upon request, a copy of the record that was disclosed; and

(3) Give the parent or eligible student, upon request, an opportunity for a hearing under subpart C.

(b) An educational agency or institution may disclose an education record of a student in attendance to another educational agency or institution if:

(1) The student is enrolled in or receives services from the other agency or institution; and

(2) The disclosure meets the requirements of paragraph (a) of this section.

§99.7 What must an educational agency or institution include in its annual notification?

(a) (1) Each educational agency or institution shall annually notify parents of students currently in attendance, or eligible students currently in attendance, of their rights under the Act and this part.

(2) The notice must inform parents or eligible students that they have the right to—

(i) Inspect and review the student's education records;

(ii) 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;

(iii) Consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that the Act and §99.31 authorize disclosure without consent; and

(iv) File with the Department a complaint under §§99.63 and 99.64 concerning alleged failures by the educational agency or institution to comply with the requirements of the Act and this part.

(3) The notice must include all of the following:

(i) The procedure for exercising the right to inspect and review education records.

(ii) The procedure for requesting amendment of records under §99.20.

(iii) If the educational agency or institution has a policy of disclosing education records under §99.31(a)(1), a specification of criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

(b) An educational agency or institution may provide this notice by any means that are reasonably likely to inform the parents or eligible students of their rights.

(1) An educational agency or institution shall effectively notify parents or eligible students who are disabled.

(2) An agency or institution of elementary or secondary education shall effectively notify parents who have a primary or home language other than English.

Attachment C – OSU’s Annual FERPA Notification to Students

Students’ Right to Privacy Notice

The Family Educational Rights and Privacy Act of 1974 (Buckley Amendment) was designed to protect the privacy of educational records, to establish the right of students to inspect and review their educational records in all offices, and to provide guidelines for the correction of inaccurate or misleading data through informal and formal hearings.

An OSU student has the right to:

1. Inspect and review information contained in his or her educational records within 45 days of the day that the University receives a written request from the student.
2. Challenge the contents of the educational record.
3. Have a hearing if the outcome of a challenge is unsatisfactory.
4. Submit an explanatory statement for inclusion in the educational record, if the outcome of the hearing is unsatisfactory.
5. Secure a copy of the institutional policy, which includes the location of all educational records.
6. Prevent disclosure, with certain exceptions, of personally identifiable information from the educational record.
7. File a complaint with the U.S. Department of Education concerning alleged failures by the University to comply with the requirements of FERPA. The name and address of the office that administers FERPA is: Student Privacy Policy Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-8520.

Withholding Disclosure of Information. Currently enrolled students may withhold disclosure of directory information. A student may file a written request with the Office of the Registrar to not release personally identifiable information, including directory information. Such requests will be honored until revoked by the student. The University assumes that failure on the part of any student to specifically request the withholding of directory information indicates individual approval for disclosure.

Access to Records. Students may inspect and review their educational records by making a written request to the office that maintains the records (See Location of Records below). No non-directory information regarding students’ educational records may be disclosed to anyone without written consent of students, except for selected purposes as authorized by federal law, such as to "school officials" who have a "legitimate educational interest" in the student, to another institution to which a student seeks or intends to enroll or is already enrolled if the disclosure is related to the student's enrollment or transfer, and in response to a lawfully issued court order or subpoena.

Parental Access to Records. At the postsecondary level, parents have no inherent rights to inspect their son’s or daughter’s educational records. Information regarding educational records is best obtained by direct communication between the parent and the student. Students may consent to release their educational records to parents, legal guardians or other individuals by completing the appropriate form in the Office of the Registrar. Such consent should be given in an uncoercive environment. Parents of a dependent student may challenge denial of access to educational records by producing the most current copy of Internal Revenue Form 1040.

Definitions. "Educational Record" refers to those records which are directly related to a student and are maintained by an educational institution.

Directory Information includes: student’s name (including chosen or preferred first name); local and permanent address or hometown; telephone number; year of birth; major field of study; weight and height of student participating in officially recognized sports; dates of attendance at Oklahoma State University; degrees, honors, and awards granted or received and dates granted or received; academic classification such as freshman, sophomore, junior, senior, etc.; institutional electronic mail address; most recent educational institution previously attended; dissertation or thesis title; thesis dissertation advisor; participation in officially recognized organizations, activities, and sports; parents; names and addresses (city and state only).

“School official” is defined as an individual currently servicing as a member of the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges; the President of OSU and the administrators, faculty and staff they supervise; the President and CEO of the Alumni Association and President and CEO of the Oklahoma State University Foundation and

the staff they supervise; the National Student Clearinghouse; and contractors, volunteers and other non-employees performing institutional functions as school officials with legitimate education interest.

“Legitimate educational interest” is defined as an interest which results from the duties officially assigned to a school official and which are related to such a school official’s responsibility for facilitating the student’s development. School officials may have legitimate educational interests both in students who are currently enrolled and in those no longer enrolled.

Location of Records. Several offices share responsibility for maintaining and releasing information pertaining to student education records. These include but are not restricted to: 1) the Office of the Registrar for academic records, b) the Office of Student Conduct Education and administration for disciplinary records, c) the Office of the Bursar for billing and payment records, 3) the Office of Scholarships and Financial Aid for scholarship and financial aid records, 3) the Human Resources office or Career Services office for employment / placement records, and f) the Communications Service office for directory information.

Challenge the Content of Records. When a student seeks to challenge the content of the educational record, the following steps will be used:

1. The student will submit a written request to the official responsible for maintaining the record, with such request specifying the content being challenged, the grounds for the challenge, and the exact action being sought.
2. Within one month of the request, the official shall provide a written response. If the official grants the request, the change(s) will be made. If the request is denied, the letter will explain why and will inform the student they may add an explanation to the record and/or appeal the official’s decision. If the student adds an explanation to the record, the explanation will accompany the part of the record to which the explanation pertains, whenever that part of the record is released.
3. An appeal may be filed by submitting a written request to the Vice President to whom the official responsible for maintaining the record reports.

Oklahoma State University Policy and Procedures

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (BUCKLEY AMENDMENT)	2-0701 ACADEMIC AFFAIRS August 2021
--	--

PURPOSE AND SCOPE

1.01 The purpose of this policy is to clarify Oklahoma State University's (OSU's) rights and responsibilities relative to the Family Educational Rights and Privacy Act of 1974, known as the "Buckley Amendment."

POLICY

2.01 Current and former students and parents of students, where appropriate, have the right to review educational records maintained about them by the institution, except for material to which the student has waived right of access, or for material specifically determined to be confidential by law. Students shall be informed of their rights each year.

2.02 Information contained in educational records is confidential, but may be reviewed by "school officials" who have a "legitimate educational interest" in the student without prior consent of the student. "School official" is defined as an individual currently serving as a member of the Board of Regents for the Oklahoma Agricultural and Mechanical Colleges; the President of OSU and the administrators, faculty and staff they supervise; the President and CEO of the Alumni Association and the President and CEO of the Oklahoma State University Foundation and the staff they supervise; the National Student Clearinghouse; and contractors, volunteers, and other non-employees performing institutional functions as school officials with legitimate educational interests. A school official has a "legitimate educational interest" if a review of a student's record is necessary to fulfill the official's professional responsibilities to the University. School officials may have legitimate educational interests both in students who are currently enrolled and in those no longer enrolled.

2.03 Directory Information as defined herein may be released without prior consent of the student unless the student formally requests such information be kept confidential. Such requests for confidentiality of directory information remain in effect until revoked by the student and apply to all categories of directory information, i.e., students may not specify only some of the items be kept confidential. Only identifiers acceptable under FERPA will be used to identify students whose records are released. Rights afforded to "students" in this document may also be claimed by parents and/or legal guardians who are assigned such rights by the law--i.e., who claim the student as a dependent for federal income tax purposes.

2.04 A student may be provided with copies of all or a part of his or her own educational record, however, the University reserves the right both to charge for this service and to suspend such rights to copies in those cases in which the student has an outstanding obligation to the institution. Such a "hold" on the records will be removed when the obligation is legally and morally satisfied.

2.05 Requests from off-campus parties for information from educational records shall be handled through the office responsible for maintaining the record. No non-directory information regarding students' educational records may be disclosed to anyone without written consent of students, except for selected purposes as authorized by federal law, such as to "school officials" who have a "legitimate educational interest" in the student, to another institution to which a student seeks or intends to enroll or is already enrolled if the disclosure is related to the student's enrollment or transfer, and in response to a lawfully issued court order or subpoena. Offices responsible for maintaining educational records include but are not restricted to: a) the Office of the Registrar for academic records; b) the Office of Student Support and Conduct for disciplinary records; c) the Office of the Bursar for billing and payment records; d) the Office of Scholarships and Financial Aid for scholarship and financial aid records; e) the Human Resources office or Career Services office for

employment/placement records; and f) the Communication Services office for directory information. A student or former student, however, may request any school official to release personally identifiable information from his or her records to a third party by providing written authorization.

2.06 A record of non-routine disclosure of personally identifiable information – i.e., disclosure to persons other than school officials who have a legitimate educational interest in the student (see 2.02 above) – shall be maintained in each student’s file, and such a record may be reviewed by the student.

2.07 A student may challenge the content of the educational record if such records are believed to be inaccurate, misleading, or in violation of the privacy or other rights of the student.

2.08 Faculty, staff, and other employees or volunteers serving as school officials with legitimate educational interest complete university-sponsored FERPA training before obtaining access to student education records.

2.09 If an articulable and significant threat to the health or safety of a student or other individual is determined, University personnel may disclose information from education records to any person, including parents, whose knowledge of the information is necessary to protect the health or safety of the student or other individuals. University personnel must record in the student’s file the articulable and significant threat which formed the rational basis for the disclosure.

2.10 Methods in compliance with FERPA will be used to identify and authenticate the identity of students, parents, school officials, and other parties to whom personally identifiable information from education records is released.

PROCEDURE

3.01 Each year, the Registrar shall publicly notify students of their right to review their own educational records, and students seeking access to their own educational records should present themselves to the appropriate central office (see Section 2.05 above) and make their request to a member of the office staff. Positive identification will be expected.

- A. The staff member will satisfy himself or herself that the student is the student to whom the records pertain.
- B. The staff member will review the educational record file and remove any material to which the student does not have the right of access, or the staff member may request the student make an appointment to review the record, with such appointment being within the legal maximum period of forty-five (45) days. No reason for the delay needs to be given.
- C. The student shall review the record in the office under the supervision of the office staff, and under no circumstances shall the student remove or alter any part of the record.

3.02 “Directory Information” consists of the following information and is subject to change provided the change is effective only at the subsequent year (i.e., fall term) and provided the change(s) is/are appropriately publicized.

- A. student’s name (including chosen or preferred first name), local, and permanent address or hometown
- B. telephone number
- C. year of birth
- D. major field of study
- E. weight and height of student participating in officially recognized sports
- F. dates of attendance at Oklahoma State University
- G. degrees, honors, and awards granted or received, and dates granted or received
- H. academic classification such as freshman, sophomore, junior, senior, etc.
- I. institutional electronic mail address
- J. most recent educational institution previously attended
- K. dissertation or thesis title
- L. advisor or thesis/dissertation advisor
- M. participation in officially recognized organizations, activities, and sports
- N. parents’ names and addresses (city and state only)

Students who want directory information kept confidential shall complete the designated form, doing so in the Office of the Registrar on or before the date established by and publicized by said office.

3.03 A student who wants a copy of information contained in the educational record shall make such request in writing to the official responsible for maintaining the record. The request shall clearly identify what material is to be copied. Fees for copies are as follows: Copies of transcripts shall be provided at the rate established by the Registrar for all such requests; copies of other records shall be provided at a per page rate equal to the rate established for photocopy machines housed in the University Library.

3.04 When personally identifiable information is released from the educational record to individuals or parties (other than those for whom record-keeping requirements are not mandated), a record shall be kept of who requested the material, why the request was made, and what material, if any, was made available. In addition, records must be maintained of the names of state and local educational authorities and federal officials and agencies which may make further disclosures of personally identifiable information from the student's education records without consent. The university must obtain a copy of the record of further disclosures maintained and make it available in response to an eligible student's request to review the record.

3.05 When a student challenges the content of the educational record, the following steps will be used:

- A. The student will submit a written request to the official responsible for maintaining the record, with such request specifying the content being challenged, the grounds for the challenge, and the exact action being sought.
- B. Within one month (i.e., 22 working days) of the request, the official shall provide a written response. If the official grants the request, the change(s) will be made. If the request is denied, the letter will explain why and will inform the student he or she may add an explanation to the record and/or appeal the official's decision. If the student adds an explanation to the record, the explanation will accompany the part of the record to which the explanation pertains, whenever that part of the record is released.
- C. An appeal may be filed by submitting a written request to the Vice President to whom the official responsible for maintaining the record reports (for example, the Vice President of Academic Affairs for records maintained by the Registrar or the Academic Colleges and the Vice President of Administration and Finance for records maintained by the Bursar). Attach a copy of the original letter and the official's response. The Vice President will appoint a hearing officer who does not have direct interest in the outcome of the hearing. The hearing officer will arrange a hearing with the student within one month at a mutually agreeable time and place. In the event the student is accompanied by legal counsel, the hearing officer must be notified of the fact at least three working days prior to the hearing. Based on the results of the hearing, either (1) information which is judged to be inaccurate, misleading, or in violation of the privacy rights of the student shall be amended accordingly or (2) the student will be informed of the right to place a statement in the record commenting on the contested information. The hearing officer will convey the hearing decision in writing to the student, the official responsible for maintaining the record, and the appropriate Vice President.

Approved:

October 26, 1976

Revisions:

June 2007

March 2008

January 2011

February 2011

Revisions:

Directors of Student Academic Services, February 17, 2021

Instruction Council, February 18, 2021

Faculty Council, April 13, 2021

Council of Deans, May 13, 2021

Executive Team, August 25, 2021