THE
UNIVERSITY
OF RHODE ISLAND

PROCEDURES for the Policy on the Rights of Students Pursuant to FERPA

Policy Number: 03.101.1

Introduction

The University of Rhode Island (also, "University") complies with the Family Educational Rights and Privacy Act ("FERPA") of 1974. FERPA is designed to protect the privacy of Education Records, establish the right of eligible students to inspect and review their Education Records, and provide for a process to correct inaccurate or misleading content within Education Records. These procedures, as amended from time to time, describe the process for students to follow in exercising their rights under FERPA and the responsibilities of School Officials. Capitalized terms used in the Procedures that are not otherwise defined have the meaning assigned in the Policy on the Rights of Students Pursuant to FERPA.

Questions regarding these procedures should be directed to the Executive Director of Enrollment Services or Registration & Records Office at (401) 874-9500 or email: FERPA-group@uri.edu.

I. Annual Notice

The Executive Director of Enrollment Services, or designee prepares the University's Annual FERPA Notification, consulting with the Office of the General Counsel or Enterprise Compliance as needed. The FERPA notification will be distributed campus-wide via the Division of External Relations and Communications and will be posted on a university website. The Executive Director of Enrollment Services targets release of the annual notice and website updates during the Fall term (September-December).

II. Request Record Inspection and Review

In accordance with FERPA, students have the right to inspect and review their Education Record(s) upon written request. To request access to an Education Record, a student must submit a written request to the Registration & Records Office, either via email or in person, and specify which records they wish to inspect.

Registration & Records Office
Green Hall
6 Rhody Ram Way
Kingston, RI 02881
FERPA-group@uri.edu

Upon receipt of a written request, the appropriate Record Custodian will strive to provide the student with a written acknowledgement confirming receipt of the request and outlining the identity verification requirements. Students may request that records be made available for inspection on-site, provided electronically, mailed, faxed, or delivered through another reasonable method. Any requested method of access or delivery is subject to university approval and must be consistent with applicable law.

Prior to the inspection, release, transmission, or delivery of any Education Records, the identity of the student requesting the records must be successfully verified. A student will be required to present a valid form of photo identification such as a URI ID, passport, Government ID, or state driver's license before the records are made available. The University offers the following options for verification: 1. In-person at the location determined by the Record Custodian; or 2. Via Zoom/Webex virtual session hosted by the Record Custodian (valid form of ID required over webcam).

The Record Custodian will arrange for access to the requested records and will provide written notice to the student regarding the time, place, and method by which the records will be made available within forty-five (45) calendar days. If a student requests a copy of the Education Records, the University may assess a reasonable fee for copy and delivery, as permitted by law.

A student may request clarification or explanation of information within their Education Record. After inspecting the record(s), a student may submit a request for explanation or interpretation to the Registration & Records Office, either in person or via email. The Record Custodian will respond in writing within fifteen (15) calendar days to schedule a meeting or provide a written explanation of the record.

III. Request Amendment

A student who wishes to request an amendment to their Education Record may submit a request to amend or remove Education Records to the Registration & Records Office, either in person or via email. By law, the University is required to consider only requests to amend information that is alleged to be inaccurate, misleading, or otherwise in violation of the student's rights of privacy. The FERPA amendment process is not a substitute for university procedures governing grade appeals, academic decisions, student conduct matters, or other substantive determinations for which University review or appeal procedures exist. The written request should clearly identify the part of the record the student is requesting be changed and specify why the student considers the record to be inaccurate, misleading, or otherwise in violation of the student's privacy rights.

Upon receipt of a completed request for amendment of an Education Record, the Registration & Records Office or the applicable Record Custodian will first determine whether the request is eligible for consideration under these procedures. If the request is determined to be eligible, the Registration and Records office or Record Custodian will then review the requested amendment and determine whether to approve or deny the request.

The student will be notified in writing of the eligibility determination and, when applicable, the decision regarding the requested amendment within a reasonable period, not to exceed thirty (30) calendar days from the date of the request. The written notice will inform the student whether:

- The request is eligible for consideration, the requested amendment has been approved, and the record has been amended;
- The request is eligible for consideration, but the requested amendment has been denied, including the basis for the decision and information regarding the student's right to request a formal hearing; or
- The request is not eligible for consideration under these procedures.

IV. Request a Formal Hearing

Upon denial of an eligible record amendment request, students may request a formal hearing by submitting a request to the Registration & Records Office, either in person or via email. The request for a hearing should include:

- Copies of the contested record(s) or a description of the contested record(s) with enough specificity that they can be identified and located by the Registration & Records Office;
- A statement that the student requested an amendment in accordance with section III of these procedures; and
- A statement explaining why the student believes the record(s) is inaccurate, misleading, or in violation of the student's privacy rights.

The Registration & Records Office generally endeavors to acknowledge receipt of a written request for a hearing within five (5) business days. The Registration & Records Office will review the request to determine if it is complete

and presents a proper basis for the request for formal hearing. If the request is not complete or does not present a proper basis for the request, the Registration & Records Office may deny the request. If the request is complete and presents a proper basis for the request, the Registration & Records Office will refer the request to the Executive Director of Enrollment Services, who will be responsible for scheduling the hearing as set forth in this section.

A. Student Rights at the Hearing

A student has the right to:

- Present information and evidence relevant to the issues raised. To have a full and fair opportunity to present evidence concerning requested corrections to the Education Record.
- Have a hearing officer who does not have a direct interest in the outcome of the hearing.
- Be advised by one or more individuals, including counsel.
- Receive, within a reasonable period after the hearing, but not more than thirty (30) calendar days, a written decision based solely on the evidence provided at the hearing. The decision will include a summary of evidence and reasons for the decision.

B. University Rights and Responsibilities

The Executive Director of Enrollment Services or their designee will:

- Schedule and ensure a hearing is conducted within a reasonable time, ordinarily within forty-five (45) calendar days after receiving the hearing request.
- Select a hearing officer in accordance with FERPA requirements. The hearing officer will be a School Official who does not have a direct interest in the hearing outcome. The hearing shall in all respects be under the control of the hearing officer and shall not be subject to formal rules of evidence or procedure.
- Provide the student written notice of the date, time, location, and procedures of the hearing at least fourteen (14) calendar days in advance of the hearing, or as soon reasonably practicable to provide a reasonable opportunity for preparation.
- Obtain and provide to the hearing officer evidence that supports the previous determination not to amend the student's Education Record from the Registration & Records Office or applicable Record Custodian.
- Maintain documentation demonstrating compliance with all FERPA requirements relating to students right to a formal hearing.

C. Role of the Hearing Officer

The Hearing Officer will:

- Allow the student the opportunity to present evidence relevant to the issues raised. The hearing officer has the right to determine whether evidence presented is relevant to the record and issue(s) in question.
- Decide solely on the evidence presented at the hearing.
- Provide the student with a timely written decision, including a summary of the evidence and reason for the decision.

D. Hearing Outcome

If the hearing officer finds that the record is inaccurate, misleading, or otherwise in violation of the privacy rights of the student, the University will amend the record accordingly. The student will be notified in writing of the correction. If the hearing officer finds that the information in the Education Record is not inaccurate, misleading, or otherwise in violation of the privacy rights of the student, the University will

notify the student of the right to place a statement in the record commenting on the contested portion of the record, or stating why they disagree with the decision not to amend, or both. The University will maintain this statement with the contested portion of the student's Education Record for as long as the record is maintained. The statement will be disclosed whenever the University is required to disclose the portion of the record to which the statement relates.

V. Release of Directory Information

The University may disclose information that has been designated as Directory Information to a third party without prior written consent of a student. A student may limit the disclosure by going to **e-Campus** and selecting:

Self Service > Campus Personal Information > FERPA Restrictions > edit FERPA/Directory Restrictions.

Once a student places a hold on the disclosure of Directory Information, that hold will remain in effect until modified by the student via e-Campus. Restricted information will not be released to any source, including publications such as telephone directories or other institutional publications. Students with a FERPA block will generally not appear on publicly released Dean's Lists or in Commencement Programs. A student must perform the following to release the block for certain publications:

- To appear on the publicly released President and Dean's Lists, students must remove restrictions on their home address, all attendance dates, all honors/awards, and primary name no later than two weeks after the semester ends.
- To appear in the Commencement Program, students must remove restrictions on all degrees, all academic levels, all honors/awards, major(s), and primary name no later than April 1.
- To notify local media, students must also remove restrictions on their home address.

Note: Only city and state of a student's home address is shared as Directory Information when the restriction is removed.

Upon receiving a request for Directory Information, the Record Custodian will confirm that the student did not opt out of Directory Information release in e-Campus. When working in e-Campus, an individual's FERPA restriction status can be identified by the FERPA "Shade" symbol. The FERPA "Shade" can be seen on all student record screens. If the student has opted out and blocked release of Directory Information, no information may be released about that student. If unable to confirm whether a student has opted out, the information should not be released.

VI. Consent to Release Education Records

The Registration & Records Office does not accept broad or ongoing written consent for disclosure of Education Record information. Students are encouraged to work directly with their parents and third parties to make information in their Education Record available.

Students may authorize the disclosure of their Education Records to a third party by submitting a signed Consent to Release Student Education Records Form. Forms may be submitted in person or via email to:

Registration & Records Office:
Green Hall
6 Rhody Ram Way
Kingston, RI 02881
(401) 874-9500
Email: FERPA-group@uri.edu

The consent form must be signed and dated and specify:

- The Education Record information to be disclosed;
- The name of the person or entity to whom the information is being disclosed;
- The purpose for the disclosure; and
- Further release of the records to any other person, group, corporation, or entity is expressly prohibited without further written consent by the student or as otherwise permitted by FERPA.

Upon receipt of a completed consent form, the Registration & Records Office or applicable Record Custodian will:

- Verify the identity of the requester using established authentication methods (e.g., government-issued ID or notary); and
- Verify the identity of the recipient and method of disclosure.

VII. Education Records Released Without Consent

The University may disclose Personally Identifiable Information from a student's Education Record without the student's prior written consent in accordance with FERPA, other applicable laws, and University Policy. Requests for access should be directed to the applicable Record Custodian for review and processing.

Upon receipt of a request for access, the Record Custodian shall:

1. Verify the identity of the requesting party;
2. Determine whether the requested information constitutes an Education Record subject to FERPA;
3. Determine whether the requesting party has a legitimate educational interest, a legal right to access the information, or otherwise qualifies for disclosure without student consent under FERPA or other applicable law; and
4. Consult with the Office of the General Counsel when legal interpretation is required.

While the Policy on The Rights of Students Pursuant to FERPA lists some permissible release conditions, the following examples illustrate some common situations:

- Performing a necessary or appropriate task or activity to fulfill their assigned institutional duty for the University and specified in their position description or in a contract agreement or other official appointment.
  - Faculty accessing their students' grades, attendance, or supporting a student's request for disability accommodations.
  - Department Chairs/Deans reviewing student performance data for program evaluation.
- Performing a task related to a student's education or to student discipline.
  - Dean of Students/Conduct Officers investigating disciplinary matters or student policy violations.
- Providing a service or benefit directly relating to the student or student's family, such as health care, counseling, job placement, or financial aid.
  - Student Advisors accessing student academic records and skills assessments to provide guidance.
  - Financial Aid Staff determining eligibility based on enrollment status and academic standing.
- Maintaining safety and security on campus.
  - Environmental Health and Safety staff accessing class rosters for the purposes of administering lab safety training.

When required by FERPA, the Records Custodian shall maintain a record of each request for access to, and each disclosure of, Personally Identifiable Information from a student's Education Record. The disclosure record (also,

"Disclosure Log") shall include:

- Date the request was received.
- The name of the party requesting the information.
- The reason for the disclosure.
- Identity verification method, date verified, and name of verifying Record Custodian.
- Valid written consent from the student authorizing disclosure.
- The date of the disclosure.
- A description of the records disclosed and method of disclosure.
- Confirmation that the recipient was informed of applicable use and redisclosure restrictions.
- Name of the Record Custodian processing the request.
- Any additional information required by applicable law or University procedures.

For training on FERPA disclosure logging requirements and access to the institutional template, contact the Executive Director of Enrollment Services. Disclosure records shall be maintained with the students' Education Record and retained in accordance with applicable records retention requirements.

The Record Custodian may maintain additional procedures to support compliance obligations. Such procedures should be reviewed by the Executive Director of Enrollment Services or designee to help ensure consistency with institutional requirements.

VIII. Record Retention

Student Education Records, and FERPA-related documentation, must be retained and managed in accordance with the University's Policy on Records Management and may not be deleted, altered, or destroyed except as authorized. No such records may be destroyed until:

- The Executive Director of Enrollment Services (or designee) has confirmed that the records are not required for ongoing operational, legal, audit, or compliance purposes and are eligible for destruction under the applicable retention schedule; and
- Written approval for destruction has been granted by the Executive Director of Enrollment Services (or designee), in coordination with the University's Director of Records Management, where applicable.

The e-Campus system is the University's official repository used by the Registration and Records office to store, track, and maintain records of academic courses, instructors of record, student enrollments, grades, and student data. Note: The University's LMS is not an official repository for permanent storage of course materials.

IX. Reviewing Potential Violations

Suspected noncompliance or violations covered under this policy should be reported to the Executive Director of Enrollment Services. Upon receipt of a report, the Executive Director of Enrollment Services, or their designated representative, shall take the following actions:

1. Acknowledge receipt of the report in writing within 2 business days of receipt, or as soon as practicable.
2. Perform an initial assessment of the report to determine whether it meets the following criteria:
    i. falls within the scope of the Policy and applicable laws and regulations;
    ii. has a foundation or basis on fact;
    iii. sufficient information, records, and evidence are reasonably available to conduct an effective investigation; and

iv. is sufficiently credible and specific so that the potential evidence of violation may be identified.

3. If the initial assessment criteria are met, notify the Office of the General Counsel, Human Resources, other applicable offices, and appropriate university management, of the potential violation and planned investigation steps. Collaborate on any immediate containment actions that may be warranted.
4. Gather relevant information, records, evidence, and conduct interviews.
5. Within 45 calendar days, or as soon as practicable, determine whether noncompliance with university policy or FERPA has occurred and document findings, outlining the specific regulations or policies that appear to have been violated, and communicate findings to applicable department(s).
6. Evaluate whether the findings trigger any notification, reporting, contractual, regulatory, or other legal obligations applicable to the University.
7. Applicable department(s) shall implement and document measures taken to support compliance with applicable laws and university policy. The Executive Director of Enrollment Services may provide recommendations or guidance and offer support in remediation steps. Examples of remediation steps may include, but are not necessarily limited to, the following:
   - Correct inaccurate records or disclosures resulting from the incident.
   - Remove unauthorized recipients from access lists, shared drives, email distributions, or systems.
   - Update forms, workflows, procedures, or approval processes.
   - Implement additional safeguards to prevent recurrence.
   - Provide FERPA retraining to employee(s) or department(s).
   - Conduct targeted training on records handling, disclosure requirements, and safeguards.
8. The department(s) responsible shall provide written evidence of remediation, which will be maintained with the case file. Upon completion of the review and implementation of remediation steps, the case file will be closed and all associated documents securely stored in accordance with the University Policy on Records Management.

PROCEDURES Version Table

Procedures Version Issue Date	Corresponding Policy Version	Reason for Update
November 13, 2026	03.101.1	Inaugural Version