

BOARD OF REGENTS
BRIEFING PAPER

Handbook Revision: Student Directory Information

BACKGROUND & POLICY CONTEXT OF ISSUE:

The iNtegrate project is creating a new need for a re-examination of system policies as the project ties

ALTERNATIVE(S) TO WHAT IS BEI

2. Directory Information. Under the provisions of FERPA, institutions may disclose, without consent, directory information to individuals upon request *for enrolled and former students of the institution only. A disclosure of directory information is discretionary on the part of the institution.* [~~NSHE institutions must set a definition for its directory information, which may be more restrictive than provided in FERPA.~~] Directory information is defined in the Act as information contained in an education record of a current or former student which would not generally be considered harmful or an invasion of privacy if disclosed. [~~The Act defines such information as including, but not limited to:~~ *The Nevada System of Higher Education designates the following information as directory information for students:*

- a. *Name;*
- b. *Participation in officially recognized activities and sports;*
- c. *Address;*
- d. *Telephone number;*
- e. *Weight and height of members of athletic teams;*
- f. *E-mail address;*
- g. *Degrees, honors, and awards received;*
- h. *Major field of study;*
- i. *College;*
- j. *Dates of attendance;*
- k. *Date of graduation;*
- l. *Undergraduate or graduate status;*
- m. *Most recent educational agency or institution attended; and*
- n. *Enrollment status (full-time or part-time).*

- ~~Name;~~
- ~~Address;~~
- ~~Telephone [number];~~
- ~~Date and place of birth;~~
- ~~Major field of study;~~
- ~~Participation in officially recognized activities and sports;~~
- ~~Weight and height of members of athletic teams;~~
- ~~Dates of attendance;~~
- ~~Degrees, and awards received; and~~
- ~~Most recent [previous] educational agency or institution attended.]~~

3. Notification Requirements. Each NSHE institution shall annually disclose [~~its~~] *the* definition of directory information in writing and provide a form on which students may elect to be removed from the directory listing under three options. The annual notification and form must be published within the first 5 pages of the institutional catalog and each class schedule. A common statement about the uses of directory information shall be provided on the form.

- a. Privacy Statement. *The Chancellor shall develop a privacy statement that shall be included on the institutional form used by students for requesting the non-disclosure of directory information.* [~~The following statement must appear in boldface type in a box on the form used by students for requesting non-disclosure of directory information. Additional clarifying language may be added to this statement by the institution.~~]

NSHE Procedures and Guidelines Manual

CHAPTER 6, SECTION 13

Student Directory Information – Non-Disclosure Statement

Additions appear in ***boldface italics***; deletions are [~~stricken~~ and bracketed]

Section 13. Student Directory Information – Non-Disclosure Statement

The following statement must appear in boldface type in a box on the form used by students for requesting non-disclosure of student directory information.

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

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

A student should submit to the registrar, dean, head of the academic department, or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The institution official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the institution official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

(2) The right to request the amendment of the student's education records that the student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

A student who wishes to ask the institution to amend a record should write the institution official responsible for the record, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If the institution decides not to amend the record as requested, the institution will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

(3) The right to provide written consent before the institution discloses personally identifiable information from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

The institution discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the institution in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the institution has contracted as its agent to provide a service instead of using institutional employees or officials (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or a 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 school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the institution.

Upon request, the institution also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

The Nevada System of Higher Education has designated the following information as directory information:

- a. Name;*
- b. Participation in officially recognized activities and sports;*
- c. Address;*
- d. Telephone number;*
- e. Weight and height of members of athletic teams;*
- f. E-mail address;*
- g. Degrees, honors, and awards received;*
- h. Major field of study;*
- i. College;*
- j. Dates of attendance;*
- k. Date of graduation;*
- l. Undergraduate or graduate status;*
- m. Most recent educational agency or institution attended; and*
- n. Enrollment status (full-time or part-time).*

Students have the right to refuse to let NSHE designate this information as directory information and have until the end of the first six weeks of the fall or spring semester to submit a request for non-disclosure of the above items. A request for non-disclosure submitted at one NSHE institution will apply to all NSHE institutions.

(4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the institution 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, SW
Washington, DC 20202-5901*

University of Nevada, Las Vegas

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Educational Computer Services (ECSI)	Student loan service	This information is for current and former students with outstanding debts.
Nelnet Business Solutions (NBS)	Electronic student billing and payment service	No solicitation of students.
Tuition Management Systems (TMS)	Payment plan services	Information for current and new Students is provided and controlled by Student Accounts office and Student Affairs.
Bank of America	Affinity Credit Card	Current Students are NOT solicited. Solicitations are only sent to alumni of the institution. UNLV Alumni Association approves all content before mailing and controls the distribution of this information by providing the data contained in UNLV's database of alumni to our affinity partner for a one-time use (written agreements in place).
Liberty Mutual	Auto and Home Insurance	Current Students are NOT solicited. Solicitations are only sent to alumni of the institution. UNLV Alumni Association approves all content before mailing and controls

Commercial Entity ¹	Goods or services provided ²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution. ³
<p>Account Control TechNologies (ACT) Collection Agency</p>	<p>Collections of Account Receivables, Tuition, fees,</p>	<p>the distribution of this information by providing the data contained in UNLV's database of alumni and donors to our affinity partner for a one-time use (written agreements in place). This information is for current and former students with outstanding</p>

Commercial Entity¹

Goods or services provided²



University of Nevada, Reno

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Bank of America	Credit card services	Yes – Former Students only; Bank of America
GEICO	Insurance	Yes – Former Students only; Geico
GoNEXT (a travel/tour company providing programs exclusively through associations)	Travel programs	Yes – Former Students only; GoNEXT
NCAA	Information on student athletes provided for media guides, academic honors, press releases, NCAA waivers, etc. Students sign waivers that allow for the release of information.	Yes; NCAA

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

Nevada State College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Nevada Credico, Inc	Collection Services	Collection Efforts Only-NSC
General Revenue Corp	Collection Services	Collection Efforts Only-NSC
Coast Professional, Inc	Collection Services	Collection Efforts Only-NSC

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

College of Southern Nevada

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Account Control Technology (ACT)	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Coast Professionals	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Credit Interchange Receivable Management	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Gila Corp.	Collection of outstanding accounts	This information is for current and former students with outstanding debts
NCO Financial	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Educational Computer Services (ECSI)	Student Loan Service	This information is for current and former students with outstanding debts
Follett Bookstores	Campus Bookstore	Current students are not solicited by the vendor. CSN provides to vendor ID number and award amounts of individual students

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Cedar Crestone (I don't think we have an individual contract with them. I think it is NSHE)	iNtegrate consultants sign Confidentiality Agreement forms	Receives student directory information. iNtegrate controls release of information. No students are solicited
National Student Loan Clearinghouse	Provides Student Enrollment Data	Current and former students are not solicited by vendor
NG Websolutions	Provides web-based scholarship application	Current and former students are not solicited by vendor

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is "yes", specify if you provided the list to the commercial entity or controlled the distribution yourself.

Great Basin College

Commercial Entity¹

Truckee Meadows Community College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Herf Jones Photography	Commencement photos	No

Western Nevada College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Bank of America	Student Banking – electronic transfer of funds (performed at written request of student)	Neither

- ¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.
- ². Exclude contracts for internships and clinical education affiliation agreements.
- ³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.