



University of Pittsburgh
Access to and Release of Education Records Policy Committee Charter

I. Preamble

This body is called the Access to and Release of Education Records Policy Committee (“Committee”). It is authorized by the Chancellor and will serve at the Chancellor’s discretion. The Chancellor has authorized the Provost and Senior Vice Chancellor (“SVC-P”), or their designee, to direct the operations of this Committee, consistent with the terms of this Charter. This Charter outlines the purpose, relevant background, scope, responsibilities, composition, and operations of the Committee, as well as the review process for any proposals generated by this Committee.

This document should be read in conjunction with Policy AO 01, Establishing University Policies, and all other applicable University policies, protocols, and procedures.

II. Purpose

This Committee is created for the purpose of revising University Policy AC 04, Access to and Release of Education Records, and its supporting documents (e.g., procedures, guidelines). This Policy implements the requirements governing the access and release of students’ educational records as specified in the Family Educational Rights and Privacy Act of 1974 (“FERPA”), also known as the Buckley Amendment.

III. Background

Policy AC 04 governs the University’s compliance under FERPA. Specifically, Policy AC 04 affirms (i) the rights of students to access education records and to ensure that those records are accurate; (ii) the rights of the University regarding the approval, denial, and charging for requests; (iii) the regulations and restrictions on directory information; and (iv) the requirements for the release of information, or access to student education records by a third party and the conditions under which release or access may be permitted by University officials.

Policy AC 04 was last reviewed in June 2009 and since then updates have been made in regulations pertaining to the protection of education records, and the interpretation of those regulations, which necessitate that Policy AC 04 be updated accordingly. These revisions will help to align the policy with the most current regulatory requirements, as well as reflect current administrative processes at the University related to the access and release of education records.

IV. Scope and Authority

The Committee will recommend a revised University Policy AC 04, and any necessary documents to support its implementation (e.g., procedures, guidelines). In doing so, the Committee's deliberations must address the following topics:

- **Scope.** Identify and review all types of education records (both in print and electronic format) to determine what should be governed by a revised Policy AC 04;
- **Compliance.** Address all regulations provided for under FERPA;
- **Procedures and Guidelines.** Develop necessary procedures and guidelines (e.g., confidentiality, record keeping, waivers) for administrative activities related to the access to and release of education records;
- **Definitions.** Revise, or otherwise update and add, definitions as necessary to align with requirements under FERPA and the Office of the University Registrar's implementation procedures. Such terms include, but are not limited to, "in attendance," "school official," "legitimate educational interest," and "directory information" (to include enrollment status of full-time or part-time);
- **Maintenance and Security.** Address requirements related to the maintenance and security of education records, including disclosure requests from or to third parties;
- **Clarity.** Revise, streamline, or otherwise clarify, processes and/or procedures for students to access, correct, and/or amend their education records; and
- **Roles and Responsibilities.** Identify and establish roles and responsibilities related to the oversight and implementation. Such roles and responsibilities should include, at a minimum, the requirement of regular training related to FERPA compliance, including considering the use of a central office to oversee that compliance and the maintenance of a FERPA Compliance Program by that office or offices.

V. Responsibilities

As provided above, the Committee is created for the purpose of revising University Policy AC 04 and its supporting documents. To perform this function, the Committee has the responsibility to:

- Review the University's current FERPA practices and support services;
- Discuss best practices in higher education related to the access and release of education records and FERPA compliance, including benchmarking peer universities' respective policies on the matter;

- In accordance with the terms of this Charter, consult with stakeholders (e.g., schools, offices, faculty, staff, students) at the University during the drafting of a revised Policy AC 04;
- In accordance with the terms of this Charter, consult with the Office of the University Registrar, the Office of Compliance, Investigations, and Ethics, and Pitt IT during the development of a draft Policy;
- Incorporate or address applicable local, state, and federal requirements into the proposed Policy and procedures;
- Recommend a draft Policy for review pursuant to the process described in Section VII below, and consider feedback during that review; and
- Recommend accompanying draft procedures needed for the effective and efficient implementation of the proposed Policy.

It is expected that the Committee will work in confidence to have a full and frank discussion of all options. Individual members should maintain the deliberations of the Committee confidential and are expected to not discuss the content of the Committee's deliberations outside of the Committee, unless authorized to do so by the Committee. The broader community will have an opportunity to consider the Committee's proposals pursuant to the process described in Section VIII below.

VI. Composition

The Committee will be co-chaired by **Jonathan Helm**, University Registrar, and **Laurel Gift**, Assistant Vice Chancellor for Compliance, Investigations, and Ethics. The Committee will include the following members:

1. **James Baldwin**, Vice President of Enrollment Management, Pitt Bradford
2. **Grace Bohl**, SGB Representative
3. **Amanda Brodish**, Associate Vice Provost for Data Analytics
4. **Jay Darr**, Associate Dean of Students for Wellness
5. **John Duska**, Interim Chief Information Security Officer
6. **Ericha Geppert**, Compliance Analyst
7. **Jessica Hatherhill**, Executive Director for Undergraduate Studies and the College of General Studies, Dietrich School of Arts & Sciences
8. **Jordyn Kamasa**, GPSG Representative
9. **Alexandra Linsenmeyer**, Dean of Students, School of Law
10. **Ryan Mitchell**, Associate Athletic Director for Compliance
11. **John Stoner**, Teaching Professor, Department of History; Senate Committee on Educational Policies Representative
12. **Rochelle Woods**, Assistant Dean for Administration, Operations, and Academic Programs, School of Education

Stan O’Loughlin, Associate Legal Counsel, will support the Committee on behalf of the Office of University Counsel.

Brittany Conner, Policy Specialist, will help facilitate and support the Committee on behalf of the Office of Policy Development and Management.

VII. Operations

The Committee will meet monthly, or more frequently as circumstances dictate. The Committee’s revised Policy AC 04 and any necessary supporting documents (e.g., procedures, guidelines) will be submitted to the SVC-P, or their designee, no later than the 2022-23 Academic Year. The SVC-P may ask for interim status reports.

After the SVC-P’s, or their designee’s, review is complete, the draft Policy will be submitted to the Office of Policy Development and Management (“Policy Office”) to coordinate its review consistent with Policy AO 01.

VIII. Proposed Policy Review Process

The review process for the Committee’s recommended Policy is as follows:

- University comment period;
- Academic Leadership Team;
- University Senate’s Committee on Educational Policies;
- Faculty Assembly;
- University Senate Council; and
- Administrative Leadership.

The Committee will coordinate with the Policy Office to consider feedback provided throughout this process.

Once this review process is complete, the proposed Policy will be sent to the Policy Office for review and submission to the Chancellor in accordance with Policy AO 01.

IX. Amendment

Any amendments to this Charter must be made in accordance with Policy AO 01 and receive the approval of the Chancellor or designee.

This Committee shall expire on the publication of a new University Policy that governs FERPA, unless otherwise directed by the Chancellor.