



University of Pittsburgh
Access to and Disclosure of Education Records
Procedure AC 04

Implementing Executive: Provost and Senior Vice Chancellor
Responsible Units: Office of University Registrar; Office of Compliance, Investigations, and Ethics
Category: Academic Policies
Effective Date: April 16, 2024

I. Purpose

This Procedure defines the processes for access to and Disclosure of Education Records and effectuates the standards established in University Policy AC 04, Access to and Disclosure of Education Records.

II. Definitions

Please refer to University Policy AC 04, Access to and Disclosure of Education Records, for definitions of the terms used in this Procedure.

III. Procedure

The Procedures below provide detail on:

- Student Requests to Inspect and Review Education Records (Section III. A.)
- Consent for Disclosure of Education Records (Section III. B.)
- Seeking to Amend Education Records (Section III. C.)
- Filing a Concern or Complaint about a Potential Violation of FERPA (Section III. D.)
- Annual Notice of Rights (Section III. E.)
- Maintaining Records of Disclosure (Section III. F.)
- Disclosing Directory Information and Student Restriction of Disclosure (Section III. G.)

A. Student Requests to Inspect and Review Education Records

- i. Students may formally request to inspect and review their own Education Record, by submitting a request in writing to the appropriate Records Custodian. The Office of the University Registrar will be available to identify Records Custodians or provide guidance in this process when necessary.
- ii. Once a request is received, the Record Custodian will coordinate the opportunity for the Student to inspect and review the requested Education Record within 45 calendar days of the request. The Record Custodian shall verify the identity of the requester through

proper photographic identification prior to allowing inspection of the Record.

B. Consent for Disclosure of Education Records

Student consent for Disclosure of their own Education Records can only be provided in writing. Valid Written Consent must be signed and dated by the Student, and it should:

- Specify the Education Record(s) that may be Disclosed; and
- Identify the party or class of parties to whom the Disclosure may be made.

Electronic signatures may qualify as signed Written Consent under FERPA when they meet accepted safe harbor standards. The University must take precaution to know that any electronic signature in fact authenticates the identity of the Student as the one having provided the signature. Thus, an electronic signature acceptable for purposes of Disclosure under FERPA would generally be those established by the University and authenticated through credentials only known by the Student and verified through University systems. This includes authentication via the University's single sign-on service (Pitt Passport), which provides access to a variety of tools such as University e-mail, specific e-signature services, and the Student information system (SIS).

A Student may permit the broad Disclosure of their Education Record information to specific individuals or third parties (e.g., parents) by completing the appropriate FERPA Consent Form and submitting it to the Office of the University Registrar. The Office of the University Registrar shall make the form available to Students through its FERPA information webpage and share completed forms, as necessary, with appropriate Record Custodians. Records Custodians will utilize reasonable methods to verify the identity of individuals or third parties prior to Disclosure of Education Records resulting from such a Consent Form.

C. Seeking to Amend Education Records

Note: This procedure is separate from those through which a Student may appeal their final grade or academic status.

Students may submit a request in writing to the appropriate Records Custodian to request an amendment to their Education Record if it is believed that the information contained in the Education Record is inaccurate, misleading, or in violation of the privacy rights of the Student. Such a request should clearly identify the Student, the Record believed to be inaccurate or misleading, the amendment being requested, and any evidence that supports the need for amendment. The Office of the University Registrar will be available to identify Records Custodians or provide guidance in this process when necessary.

Records Custodians must respond to Students' amendment requests within 30 days. If the Records Custodian agrees with the request, they may make the change and must notify the Student in writing of the amendment. If the Records Custodian disagrees with the request, the Records Custodian must notify the Student of the denial of the request and their right to request a hearing.

Students seeking a hearing upon the denial of their amendment request should notify the Office of the University Registrar in writing. The Office of the University Registrar will communicate

the hearing procedures upon receipt of a hearing request. Hearings shall be held within a reasonable time after the request is received and will be administered by an impartial party.

If the decision is to change the Record, the University Registrar shall notify the requester and instruct the Record Custodian to amend the Record. If the decision is to reject the request to amend the Record, the University Registrar shall prepare a written notice to the requester and the Record Custodian indicating the decision and reasons for the decision, as well as information on the opportunity for the Student to place an explanatory statement in their Education Record, stating the reason(s) that the Record is believed to inaccurate or misleading.

If the Student requests an Explanatory Statement be added, the Record Custodian shall maintain it as part of the Student's Education Record as long as the Record is maintained. The Record Custodian shall attach the statement to the Record to ensure that when the disputed part of the Record is Disclosed the explanatory statement will also be Disclosed.

D. Filing a Concern or Complaint about a Potential Violation of FERPA

A Student may report a compliance concern to the University's Office of Compliance, Investigations, and Ethics via the Pitt Concern Connection at: <https://www.compliance.pitt.edu/make-report>.

The Office of Compliance, Investigations, and Ethics will conduct investigations of these reports.

A Student who would like to report a potential violation of their FERPA rights can file a complaint with the U.S. Department of Education at: <https://studentprivacy.ed.gov/file-a-complaint> or

U.S. Department of Education
Student Privacy Policy Office
400 Maryland Ave., SW
Washington, DC 20202-8520

FERPA.Complaints@ed.gov

E. Annual Notice of Rights

The Office of the University Registrar shall, at least on an annual basis, meet compliance expectations by notifying Students of their rights under FERPA and Policy AC 04. This will occur by emailing Students each semester and publishing the Annual Notice in the course catalog. In addition, the Annual Notice will be included on the Office of the University Registrar's FERPA information page.

F. Maintaining Records of Disclosure

Records of requests for access and Disclosure made from Education Records will be maintained by all Record Custodians. Records of requests for access and each Disclosure of Personally Identifiable Information must include:

- i. The parties who have requested or received Personally Identifiable Information from the Education Records; and
- ii. The Legitimate Interests the parties had in requesting or obtaining the information. Such Records do not need to be maintained for Disclosures to the Student, when resulting from Student consent, when made to School Officials with Legitimate Educational Interests, or when directed by a Federal Grand Jury or other law enforcement subpoena.
- iii. Record Custodians are responsible for ensuring the Records of Disclosure become an integral part of each Student's cumulative Education Records and are maintained at least as long as the requested or Disclosed Education Record exists.

G. Disclosing Directory Information and Student Restriction of Disclosure

The University may Disclose Personally Identifiable Information that has been defined by the University as Directory Information without a Student's prior Written Consent, provided the Student does not restrict its Disclosure as described below.

- a. The Annual Notice referenced above will inform Students of their rights under FERPA and will specifically include their right to restrict the Disclosure of Directory Information without their consent.
- b. Students may request that the University not Disclose their Directory Information, in writing via a form available through the Office of the University Registrar FERPA information webpage.
- c. Upon receipt of a Student's request to restrict the Disclosure of their Directory Information, the Office of the University Registrar shall place the indicator of such restriction in the SIS.

Given the sensitive nature of date of birth, the University does not disclose a Student's date of birth as Directory Information except as required by law or for legitimate purposes to confirm the identification of a specific Student Education Record when the date of birth is furnished by a third-party.

IV. Contact Information & Accessibility

This Procedure is posted under Academic Policies on the Office of Policy Development & Management's website and can be found at: <https://www.policy.pitt.edu>.

For specific questions related to this Procedure or FERPA compliance at the University of Pittsburgh, please contact the Office of the University Registrar at ourpitt@pitt.edu or the Office of Compliance, Investigations, and Ethics at compliance@pitt.edu.

V. Related Authorities

[University Policy AC 04, Access to and Disclosure of Education Records](#)