
REGULATIONS FOR ACCESS TO A STUDENT EDUCATION RECORD

Statement of Motive and Purpose:

San Juan Bautista School of Medicine (SJBSM), in compliance with the provisions of the Buckley Act (Family Educational and Privacy Act of 1974, as amended - FERPA), establishes a policy regarding the privacy and access to student education records. It is the school's responsibility through the Registrar's Office to ensure that educational records are kept in strict confidentiality. The following policy has been established to oversee compliance with FERPA regulations.

For more information about FERPA, you may visit the Family Policy Compliance Office's Web site at <https://studentprivacy.ed.gov>.

Definitions

1. Eligible student - students eighteen years of age or older and/or who attend a postsecondary institution at any age.
2. Student education record - information that is directly related to an eligible student and maintained by an educational agency or institution or by a party acting for the educational agency or institution in paper or electronic format.
3. Personal identifiable information (PII) - all the information pertaining to an eligible student in their educational record which includes direct identifiers such as a student's or other family member's name; and/or indirect identifiers such as a student's date of birth, place of birth, or mother's maiden name.
4. Identity verification - authentication used by an institution to establish the identity of the eligible student and/or a third-party requesting information from a student's education record.
5. Online educational services - all tools and applications such as computer software, mobile applications, and web-based tools provided by a third-party to a school that students may use in their personal capacity as part of a school activity. This does not include online services and applications, or social media used by students in their personal capacity outside of school; nor online services provided by a school to which students do not have access

Student access

1. When requesting access to information in their educational record an eligible student must comply with the following identity verification:
 - a. In person – eligible student must present their institutional ID Card
 - b. By phone - eligible student must indicate institutional ID number, their full name as listed in their student education record, and/or any additional PII requested by school personnel
 - c. By email – eligible student will use institutional email address, institutional ID number, their full name as listed in their student education record, and/or any additional PII requested by school personnel
2. Eligible student will have access to the information in their educational records such as grades, class lists, course schedules, disciplinary records, and student financial records.
3. Eligible student will not have access to information such as:
 - a. reference or recommendation letters, and/or any other document marked as "Confidential". For the eligible student to view these documents, a written request from the person or agency that issued the document must be provided.
 - b. documents which contain information about others unless there is an official authorization from the corresponding Dean and the rights of the people involved are not violated.

Disclosure of Student Education Record Information:

1. The information contained in a student's education record cannot be disclosed to third parties without the written consent of the student. The consent must be an original document signed by the student, have the date it was issued and contain the following information:
 - a. Student identity verification information - institutional ID number and full name as listed in the student education record
 - b. Specific information to be disclosed.
 - c. Purpose for which the information is authorized to be disclosed.
 - d. Third party verification information: full name and a valid ID number

2. Consent forms may be presented in person or emailed to school officials through the student's institutional email.
3. The information in the student's record may be disclosed without student consent under specific circumstances. This disclosure will not be informed to the eligible student unless they request it in writing. The circumstances are:
 1. When officers, faculty and/or agents of the School have a legitimate reason of educational interest in the performance of their responsibilities for research, education, and administration.
 2. Corresponding parties regarding financial aid services for the student
 3. When officers of public law by order of a court of justice so require.
 4. To representatives of accrediting agencies in the performance of the duties of accreditation and/or auditing agencies.
 5. To military agencies when requested for the purpose of promoting their benefits unless the eligible student notifies in writing their request to not provide.
 6. Organizations conducting studies for or on behalf of the school.
 7. Appropriate officials in case of health and/or safety emergencies

Disclosure of Student Education Record Information during COVID-19 online educational services

SJBSM will not disclose to online educational services providers identifiable information (PII) from students' records such as a student's name, date of birth, and/or place of birth, nor other family member's name without the written consent of the student.

Voluntary renunciation of Student Rights (Waiver):

The eligible student may voluntarily waive all or any of the rights provided by law over their files, provided they do so in writing. The School cannot ask the eligible student at any time to waive their rights, nor can the school violate these rights. If an eligible student has signed a waiver of their rights, they may revoke it when deemed necessary, provided they do so in writing.

Procedures for reviewing student education records:

1. An eligible student wishing to review their student education record will present a formal request to personnel from the Registrar's office.
2. Personnel from the Registrar's office will confirm identity verification and proceed to inform eligible student of a mutually convenient date for both parties for the review.
3. Personnel from the Registrar's office will always be present when an eligible student reviews their file and will explain the information contained in the documents.
4. After an eligible student reviews their student education record or part thereof, they will sign a record sheet specially provided for that purpose in the student education record.
5. If personnel from the Registrar's office deems pertinent to deny permission to an eligible student to review their record, the decision shall be notified in writing and the reason/s for the denial must be explained.
6. If the eligible student does not agree with the notification, they may take the decision to the corresponding Dean. The reasons will be analyzed, and an appropriate decision will be issued. A copy of the final decision will be delivered to the eligible student and the original copy will be part of the student's record.
7. If the decision is adverse to the interests of an eligible student and/or students believe that their rights have been violated, they may file a complaint with the "Family Educational and Privacy Office", Department of Education, 400 Maryland Ave. SW, Room 4524, Switzer Building, Washington, DC 20203 at <https://studentprivacy.ed.gov/file-a-complaint>
8. In circumstances where an error is found upon review, students may request a correction by presenting a written consent requesting the corrections with the appropriate evidence confirming that the information shown is incorrect. Personnel from the Registrar's office will proceed to make corresponding corrections and the student consent for correction will become part of the student education record.
9. If an error is identified while reviewing the student education record, evidence must be provided to the registrar indicating that the information is incorrect, and it

must be corrected with the student's consent. If the error is in a grade, the student must present the complaint to the appropriate faculty member following school policies as described in the Institutional Catalog and/or Student Handbook. The faculty member will present a written report to the Registrar with a final decision regarding the complaint filed.

10. If the school determines that an amendment does not proceed, the student may appeal the decision. In after the appeal, the school's initial decision prevails, the eligible student has the right to place a written statement within the educational record setting forth their view regarding the decision.

Procedures for requesting copies of a student education record:

1. An eligible student may request a full copy of their student education record by filing a written request at the Registrar's Office duly signed and expressing the purpose for which the request is made.
2. Requested copy of the student education record will be provided, except for the documents that require prior authorization as established in this policy under Student Access.
3. When the motive for requesting a copy is described as personal by the student, the copy issued will be considered a non-official document and identified as a student copy.

Procedures for requesting documents from student education record

1. An eligible student may request a copy of information contained in their student education record complete the application form, make corresponding payment, and submit application with payment receipt to personnel from the Registrars office.
 - a. Applications must be filed with the Registrar's Office at least ten (10) days before the record date is needed.
 - b. Copies requested for official purposes will be considered an official document and will be sent directly by the School to the institution designated by the student.
 - c. Official transcripts and student certifications will be mailed within a minimum period of five (5) days. Letters of recommendation and Board certifications will be mailed within a minimum period of seven (7) days.

- d. Copies requested for personnel purposes will be considered a non-official document and identified as a student copy.
- e. Student copies will be delivered only to the eligible student unless they present a written consent as described under the section "Disclosure of Student Education Record Information".
- f. Students who are in financial debt with the school will not be issued documents and/or copies from their student education record until the situation has been resolved, and evidence is submitted with the application form.
- g. Students who have not completed documentation updates for their student education record will not be issued copies of their records.

2. Faculty and/or school officials

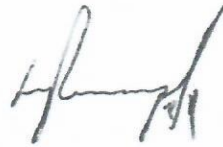
- a. Faculty and/or school officials with a legitimate educational interest will present a formal request to the Registrar in order to access information from a student's educational record.
- b. The registrar will provide solely the information necessary for the fulfillment of teaching and/or advising responsibilities.
- c. Once faculty and/or school officials are granted access, they must:
- d. Maintain information separate from any personal records relating to individual students (private notes of a professor/staff member concerning a student that are intended solely for their personal use, are not part of a student's educational record.
- e. Ensure proper use of the information, so that information will not be viewed by anyone other than the school official with the need to know.
- f. Properly dispose of all copies and/or documents of student's educational record after fulfilling their legitimate educational responsibility.

Disclosure of policy

SJBSM will notify parents eligible students currently in attendance their rights under the Act on an annual basis.

Effectivity

The disposition contained in this Executive Order will be effective immediately.

A handwritten signature in black ink, appearing to read 'Yocasta Brugal', is positioned above the printed name.

YOCASTA BRUGAL, MD
President/Dean

APROVED: August 1990

REVISED: February 2012

June 2018

April 2020