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Title

Administrative Procedure, AP 7.022

Procedures Relating to Protection of the Educational Rights and Privacy of Students

Header

Administrative Procedure Chapter 7, Student Affairs

Administrative Procedure [AP 7.022](#), Procedures Relating to Protection of the Educational Rights and Privacy of Students

Effective Date: April 2015

Prior Dates Amended: June 2001

Responsible Office: Office of the Vice President for Academic Affairs

Governing Board of Regents Policy: [RP 2.202](#), Duties of the President

Review Date: August 2018

I. Purpose

To implement Chapter 20-20, Hawai'i Administrative Rules, entitled "Protection of Educational Rights and Privacy of Students," and to comply with the federal Family Educational Rights and Privacy Act of 1974, as amended ("FERPA") (codified in 20 U.S.C. § 1232g.), as amended; federal regulations adopted by the U.S. Department of Education to implement this act (codified in 34 C.F.R. §§99.1-99.67), as amended; and Chapter 92F, Hawai'i Revised Statutes, as amended.

II. Definitions

A. "Authorized representative" means any entity or individual designated by a state or local educational authority or an agency headed by an official listed in Section III-J-1 to conduct, with respect to Federal- or State-supported education programs, any audit, evaluation, or compliance or enforcement activity in connection with Federal legal requirements that relate to these programs.

B. "Custodian of Education Records" means the registrar and administrative heads of offices in which education records are kept. The types of education records and the administrative office to contact are listed in Appendix A for each campus.

C. "Days" means calendar days.

D. "Directory Information" is more specifically defined in III-F. The University has designated categories of information as directory information if public disclosure of that category is not generally considered to be harmful or an invasion of privacy.

E. "Education record" means all records, files, documents, and other materials in both paper and electronic formats maintained by the University, which contain information directly related to a student. Excluded are the following:

1. Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record;

2. Confidential communication protected by law;

3. Records maintained by law enforcement units on a campus, used only for law enforcement purposes, which are kept apart from the education records, and are available only to law enforcement officials of the same jurisdiction;

4. University of Hawai'i personnel employment records, but not student employment records;

5. Records made and maintained by a physician, psychiatrist, psychologist or other recognized professional or paraprofessional solely in connection with the treatment of a student and which may be reviewed by a physician or other appropriate professional of the student's choice; or

6. Records created by an alumni association, University of Hawai'i Foundation, or similar organization which contain only information relating to a person after that person is no longer in attendance at a campus of the University of Hawai'i.

F. "Executive Data Stewards" for education data are System and Campus Executive Data Stewards as defined in Executive Policy EP 2.215, Institutional Data Governance. They are accountable for the use and management of student-related data at their respective campus or within the Institutional Data System under their purview and are considered University Officials. Refer to section III-I-2 for more details.

G. "Institutional Data Systems" are defined as systemwide repositories that collect and store data that are created, received, maintained and/or transmitted by the University of Hawai'i in the course of meeting its administrative and academic requirements.

H. "Legitimate educational interest" means that access to an education record is required for the purpose of performing an appropriate educational, research or administrative function of the University.

I. "Personally identifiable information" means data or information in an education record, or a combination of data or information that when considered together, would identify a student. Such data or information includes, but are not limited to: the name of the student, the names of the student's parents or other family members; a personal identifier such as the student's social security number; or a combination of data elements that would identify the student.

J. "President" means the president of the University of Hawai'i and shall include the president's designees.

K. "Restricted data" refers to data which may be freely used for educational and administrative purposes within the UH community (i.e., by students, faculty, and staff), but will not be released to external parties without student consent or a memorandum of agreement. Restricted data includes, but are not limited to, student address, phone number, and UH email address. For more information on restricted data, refer to UH's Data Classification Categories.

L. "Right to inspect" means the right of a student or a designated representative to inspect that student's education records under the supervision of University personnel.

M. "Student" means any individual who is or has been registered and is or has been in attendance at any campus of the University of Hawai'i, exclusive of the University of Hawai'i Laboratory School and University sponsored child care centers. An applicant for admission shall not be considered a student with respect to the unit to which the application has been made, even though that individual may be considered a student with respect to another unit of the University which that student has attended. The records of an applicant for admission shall be subject to the provisions of state law.

N. "Student employee" means any student who is employed by the University of Hawai'i and paid in accordance with the University's student employment classification and pay system.

O. "University" means each of the institutions and the UH System Office that fall under the jurisdiction of the Board of Regents, including any administrative sub-unit with custodial responsibility for student education records.

P. "University Officials" are those members of an institution who act in the student's educational interest within the limitations of their legitimate educational interests. These may include faculty, administrative employees, and other persons who manage student education record information including campus law enforcement personnel and student employees. University Officials may also include organizations, contractors, volunteers, and others performing institutional services or functions that the institution would normally do itself.

Q. "Vice Chancellor for Student Affairs" means the chief student affairs officer on each campus or that officer's designee.

III. Administrative Procedure

A. OBJECTIVE

To establish uniform procedures governing a student's access to the student's own education records, and access to student education records by the public, University Officials, other governmental agencies that comply with FERPA, and other parties. FERPA is incorporated herein by reference. Nothing in this procedure is intended to be contrary to state or federal laws, including FERPA. In the event of a conflict between the University's procedures and FERPA, FERPA will supersede the University's procedures. The University's procedures further clarify that the requirements of FERPA are minimum standards with which the University complies. To the extent that the provisions of the University's procedures provide for more privacy relating to student education records and directory information, the University's procedures shall control.

B. APPLICABILITY

This procedure is applicable to all campuses of the University of Hawai'i. Responsibility for administering this procedure is assigned to Custodians of Education Records, who are the administrative heads of offices in which education records are kept, and Executive Data Stewards who have the authority to approve data sharing requests involving the release of student information. Executive Data Stewards also have the authority to grant access to Institutional Data Systems where student education records are housed. Refer to section I-2 for more information on Executive Data Stewards.

C. RIGHTS OF STUDENTS

1. A student shall have the right to:

a. Inspect the student's own education records unless the student has waived that right as specified in section III-C or the education records are not subject to inspection by students as specified in section III-G.

b. Receive an explanation and interpretation of the content of such records;

c. Receive a copy of the records if failure to provide a copy would prevent the student from exercising the right of inspection.

2. A student shall have the right to request that information contained in the student's own education records be amended to insure that the information contained therein is not inaccurate, misleading, or otherwise in violation of the privacy or other rights of the student.

3. A student shall be assured that, except for the disclosure of directory information and in other instances as specified in sections III-I through III-K, the University will not disclose personally identifiable information without the student's consent.

4. A student shall have the right to request a hearing in order to resolve disputes regarding a student's right to inspect or amend the student's education records.

5. A student shall have the right to file a written complaint with the U.S. Department of Education Family Policy Compliance Office should the student determine that rights accorded herein have been violated. For more information, visit the site: familypolicy.ed.gov/complaint-form.

6. A student shall have the right to waive any of the rights in this document. The University may request a student to waive certain of these rights but it may not require a student to waive any rights.

D. WAIVER OF RIGHTS

1. A student may waive his or her right to inspect confidential letters/statements, provided that the waiver is in writing and is signed by the student using FERPA Form 1, "Waiver of Access to Confidential Letters/Statements."

2. A student may revoke any waiver of rights with respect to any actions occurring after the revocation, provided that the revocation is in writing and is signed by the student.

3. A student may choose to waive the right to inspect confidential letters and statements which were placed in his or her education records after January 1, 1975, and which involves the following activities:

- a. Admission to an educational institution;
- b. Application for employment; and
- c. Receipt of an honor or honorary recognition.

4. This waiver of rights shall be valid only if the following conditions are met:

a. The student voluntarily executes FERPA Form 1, "Waiver of Access to Confidential Letters/Statements" or similar waiver form and the form is filed in the education records of the student. A separate waiver must be executed for each office which maintains an education record and for each activity specified;

b. The student is, upon request, notified of the names of all individuals providing the letters or statements;

c. The letters or statements are to be used only for the purpose for which they were originally intended;

d. The waiver is not required by the University as a condition of admission or to receive any service or benefit provided by the University; and

e. FERPA Form 1, "Waiver of Access to Confidential Letters/Statements" is filed in the education records of the student. A separate waiver must be executed for each office which maintains an education record and for each activity specified.

E. NOTIFICATION

1. The registrar at each campus of the University shall give currently enrolled students annual notice of their privacy rights by such means as are reasonably likely to inform them of the following:

a. A listing of federal laws, regulations and university rules and policies governing the privacy rights of students;

b. The campus officer responsible for providing additional information regarding

university practices and procedures in this area including copies of relevant policies;

c. Categories of data designated as directory information;

d. Students' right to file complaints concerning alleged failures by the University to comply with the requirements of these laws and rules.

The notice provided shall advise parents and spouses of students that information contained in education records, with the exception of directory information, will not be disclosed to them without the prior written consent of the student.

F. DESCRIPTION AND DISCLOSURE OF DIRECTORY INFORMATION

1. The University designates the following information from a student's education record as "directory information."

a. Name of student;

b. Major field of study;

c. Class (i.e., freshman, sophomore, etc.);

d. Past and present participation in officially recognized activities (including positions held and official statistics related to such participation and performance);

e. Past and present participation in officially recognized sports (including positions held and official statistics related to such participation and performance);

f. Weight and height of members of athletic teams;

g. Dates of attendance;

h. Previous institution(s) attended;

i. Full or part-time status;

j. Degree(s) conferred (including dates);

k. Honors and awards (including dean's list).

2. At its discretion and initiative and in conformance with applicable state law, the University may disclose directory information to the public without obtaining a student's prior consent, so long as certain conditions regarding general notification of disclosure of directory information have been followed. These disclosures may include, for example, athletic team rosters, graduation programs, University press releases, or similar publications initiated by the University for University purposes. Specific directory information about an individual student will not be released to the public if the student has affirmatively informed the University that he or she does not want any or all of those types of information about himself or herself designated as directory information. The procedures for an individual student to "opt" out of disclosure is set forth in the following section III-F-4.

3. In general, lists or compilations of directory information will not be made available to third parties solely upon third party requests to the University.

Lists or database compilations of directory information, including compilations of restricted data, however, may be disclosed to the UH Foundation (UHF) for University development and alumni relations purposes, pursuant to the protective terms and conditions of a negotiated and mutually accepted memorandum of agreement. The directory information data fields to be shared include student name, school / college / division / department, degree, major and minor fields of study. Restricted data, including student contact information or individual identifiers, may also be shared pursuant to negotiated and mutually acceptable terms of a memorandum of agreement. Students will be notified of the release of this information to UHF through UH's annual disclosure and of their ability to request the non-disclosure of directory information through the process set forth in the following section III-F-4. Student contact information will not be released to UHF for those who elect to withhold directory information.

4. A student presently registered and in attendance at any campus may, at any time, request that all items designated as directory information not be disclosed to the public, i.e., they may opt out of disclosure.

a. A student wishing to exercise this right must submit in person, and with appropriate identification, FERPA Form 2, "Request to Opt out of Directory Information," to the Custodian of Education Records. If the form is received within the first fourteen days of instruction for a regular semester or term, or within the first four days of a summer session,

then no directory information for that student will be released until the student rescinds the request. If the form is received after the above stated periods, then no information will be released after the form is processed, which will be no later than two working days after the form is received.

b. Should a student decide to exercise the right to withhold directory information, the University will not release that information to non-University persons or organizations. The decision to withhold directory information should be carefully considered as it may affect the University's ability to respond on behalf of a student, such as for a request for verification of enrollment by prospective employers.

c. A student may rescind the request for non-disclosure of directory information at any time by completing the bottom section of FERPA Form 2 and submitting it to the Custodian of Education Records. A hold remains in effect until the student has requested in writing that the hold be removed. It may take up to two working days after the form is submitted to remove the hold.

5. The non-disclosure (or opt out) option does not apply under the following conditions:

a. The University may disclose or require the student to disclose his or her name, identifier, or institutional email address in a class in which the student is enrolled.

b. University Officials with a legitimate educational interest may access educational records as part of their job duties and responsibilities. Authorized representatives under specific conditions may also access educational records without student consent. Refer to sections I and J for more information.

c. Under federal law, address information, telephone listings, and age must be released for military recruitment purposes.

G. RECORDS NOT SUBJECT TO INSPECTION BY STUDENTS

1. The following education records are not subject to inspection by a student.

a. Financial records and statements of the student's parents or guardians submitted pursuant to an application for financial assistance, unless the student's parents or guardians have waived this right of privacy.

b. Confidential letters and statements of recommendation which were placed in the education records of a student prior to January 1, 1975, provided that:

(1) The letters and statements were solicited with a written assurance of confidentiality, or sent and retained with a documented understanding of confidentiality; and

(2) The letters and statements are used only for the purpose for which they were specifically intended.

c. Confidential letters and statements of recommendation which were placed in the education records of a student after January 1, 1975, when the student has waived his or her rights to inspect and review such letters and statements:

(1) Respecting admission to an educational institution;

(2) Respecting an application for employment; or

(3) Respecting the receipt of an honor or honorary recognition.

2. If the education records of a student contain information on more than one student, the eligible student may inspect only the information pertaining to that student.

H. STUDENT ACCESS TO EDUCATION RECORDS

A student may inspect his or her education records in accordance with the following procedure.

1. The student shall request to inspect his or her education records by completing section A of FERPA Form 3, "Request by Student to Inspect Education Records," and submitting it to each office maintaining such records.

2. The custodian of the education records shall make a reasonable effort to verify the identity of the student requesting such access and may require the student to provide appropriate documentation for this purpose.

3. The custodian for education records must comply with a student's request for access to

his or her education record within a reasonable period of time, and must not exceed 45 days after such request has been received.

4. A record of the disclosure of education records to the student shall be maintained by the custodian of the records through completion of FERPA Form 3, section B.

5. The custodian of the education record may deny a student's request for access only if the custodian is unable to verify the student's identity or otherwise determines that the request is in violation of this administrative procedure.

6. Should the student request an explanation or interpretation of his or her education records, the custodian for such records shall assist the student in obtaining such explanation or interpretation.

7. Upon termination of the requested inspection of the education records, the student shall certify the granting of access by completing FERPA Form 3, section C.

I. DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION TO UNIVERSITY OFFICIALS

1. University Officials shall be permitted access to a student's education records without the consent of the student in accordance with the following provisions (which shall be strictly construed).

It is a violation for University Officials to release any personally identifiable information to a third party or to use the information for any purpose other than for what it was provided.

a. A University Official is deemed to have a legitimate educational interest if the information requested is necessary for that official to:

(1) perform appropriate tasks that are specified in his/her position description or by a contract agreement;

(2) perform a task related to a student's education;

(3) perform a task related to the discipline of a student; or,

(4) provide a service or benefit relating to the student or student's family, such as health care, counseling, job placement or financial aid.

b. A contractor, consultant, volunteer, or other party to whom the University has outsourced institutional services or functions may be considered a University Official under this paragraph provided that the outside party is under the direct control of the University with respect to the use and maintenance of education records and that the outside party is subject to the requirements of this policy governing the use and re-disclosure of personally identifiable information from education records.

(1) Release of education records to contractors, consultants, volunteers, or other parties will require a contract or written agreement following the terms of the University's data sharing policy. For example, for organizations such as the National Student Clearinghouse (or an organization contracted by the University to handle student loan verification), a contract or written agreement will be required which specifies what information will be released, and how the organization will use and protect the information.

2. An Executive Data Steward, as defined in UH Executive Policy EP 2.215, Institutional Data Governance, is considered a University Official. He or she is responsible for the management and use of administrative and academic related data, including student education information. An Executive Data Steward approves log in access to Institutional Data Systems for UH employees and grants data sharing requests to student education information under their purview. The Executive Data Steward for student education information at each campus is generally the chief student affairs officer.

a. In the case of a dispute over whether a legitimate educational interest exists, the appeal process specified in the UH Executive Policy EP 2.215, Institutional Data Governance, will be applied.

b. The Custodian of Education Records and Executive Data Stewards shall make a reasonable effort to verify the identity of a University Official who is requesting access to student education information and to determine the existence of a legitimate educational interest.

c. The Custodian of Education Records shall inform the University Official that personally identifiable information from the education record shall not be disclosed to any other party without the prior written consent of the student except as otherwise provided in

this procedure and verify that the official has received training on handling sensitive information and will adhere to information security awareness protocols established by the University.

d. The Custodian of Education Records is not required to maintain a record of disclosure to University Officials when those records are being released for the purposes stated within this section.

J. DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION TO AUTHORIZED REPRESENTATIVES

1. Certain officials and organizations authorized by law may be permitted to inspect, review, or have disclosed to them information from a student's education records without the consent of the student, in accordance with the provisions contained in this section. These authorized representatives are as follows:

a. Officials of other schools in which a student seeks or intends to enroll, if a request for disclosure is not initiated by the student. The student shall have the right to request a record of the disclosure and to challenge the content of any record forwarded.

b. Authorized representatives of the Comptroller General of the United States of America, the United States Secretary of Education, and other state or federal education authorities for the purposes of audit or enforcement of federal programs.

c. Authorized representatives of the Comptroller General of the United States of America, the United States Secretary of Education, and other state or federal education authorities in connection with the application for, or receipt of, financial aid.

d. State and local officials to whom information is specifically required to be reported or disclosed pursuant to state statutes adopted prior to November 19, 1974.

e. Accrediting organizations in order to carry out accrediting functions.

f. Appropriate persons in connection with an emergency, in order to protect the health or safety of a student or other persons. The factors which shall be taken into account in determining whether records may be released under this paragraph include:

(1) Seriousness of the threat to the health or safety of the student or other persons;

(2) Need for the records to meet the emergency;

(3) Whether the persons to whom the records are released are in a position to deal with the emergency; and

(4) The extent to which time is of the essence in dealing with the situation.

g. To designated authorities and individuals in compliance with a lawfully issued judicial order or subpoena.

(1) The student shall be notified by mail, to his or her last known address, prior to compliance with any subpoena, unless specifically instructed to not contact the student. The University will make a reasonable attempt to contact the student.

(2) Guidelines for compliance with subpoenas are located in Appendix B. Form 4, "Subpoena Processing Checklist" and Form 5, "Notification of Subpoenaed Records" should be completed by the custodian of education records to ensure proper documentation.

h. Officials connected with financial aid which a student has applied for or received; provided that personally identifiable information from the education records of the student may be disclosed only as necessary for such purposes as:

(1) To determine the eligibility of the student for financial aid;

(2) To determine the amount of financial aid;

(3) To determine the conditions which will be imposed regarding the financial aid; or

(4) To enforce the terms and conditions of the financial aid.

A record of disclosure shall be maintained for each request for access to and each disclosure made under section III-J-1. Personally identifiable information from the education records of each student that are disclosed to authorized officials and organizations specified in section III-J-1 must be recorded on FERPA Form 6.

Education records disclosed to authorized officials and organizations shall carry the

following notation: “The personally identifiable information which is being released to you may not be disclosed to any other person without the consent of the individual student to whom it pertains nor used for any other purpose than that for which it is now approved. Any unauthorized disclosure could subject you to legal action and university disciplinary action.”

2. Organizations conducting studies for, or on behalf of, educational agencies or institutions for the purpose of developing, or validating, or administering predictive tests; administering student aid programs; and improving instruction may have disclosed to them information from a student’s education records without the consent of the student in accordance with the provisions contained in this section, provided that the studies are conducted in a manner which will not permit the personal identification of students and their parents by individuals other than representatives of the organization, and the information will be destroyed when no longer needed to fulfill the purposes for which the study was conducted. The term “organizations,” as used in this instance, includes but is not limited to, federal, state and local agencies, and independent organizations.

a. Transfer of sensitive information to these organizations must be conducted under the terms of the University’s data sharing policy;

b. An authorized representative of the University must make the request to the appropriate Executive Data Steward;

c. A written agreement must be in place which specifies the scope purpose, and duration of the study and the information to be disclosed and how the data will be handled and destroyed upon completion of the study; and

d. A record of all disclosures made under section III-J-2 will be kept in accordance to the University’s data sharing policy.

K. DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION TO OTHER PARTIES

1. Other parties, including parents of students, may have disclosed to them personally identifiable information from a student’s education records only with the written consent of the student and in accordance with the following stipulations:

a. Prior to disclosure, the Custodian of Education Records shall have received the written consent of the student to release specified education records. This written consent

shall be granted by the proper completion of FERPA Form 7, "Consent to Disclose Education Records to Third Party."

b. Any information disclosed shall bear this notation: "The personally identifiable information which is being released to you may not be disclosed to any other person without the consent of the individual student to whom it pertains nor used for any other purpose than that for which it is now approved. Any unauthorized disclosure could subject you to legal action and university disciplinary action."

c. The University will make every effort to ensure that an individual students' information is being released only to individuals authorized by the student.

d. Prior to disclosure, fees for copies, if any, shall be received by the University.

e. No record of disclosure shall be maintained for a student's education records that are disclosed to other parties upon written authorization of the student.

2. Faculty and other University Officials who receive requests for the release of non-directory information must also obtain the student's consent and complete FERPA Form 7, "Consent to Disclose Education Records to Third Party." The written confirmation should be kept on file by the individual releasing the information.

L. AMENDMENT OF EDUCATION RECORDS

A student who believes his or her own education record contains information that is inaccurate, misleading, or in violation of his or her privacy or other rights may request that the University amend those records in accordance with the following procedure:

1. The student shall notify the Custodian of Education Records that the student wishes to amend such records by filing FERPA Form 8, "Request to Amend Education Records."

2. Should the document being questioned be mandatory and required by the University as part of its internal records, the maker of the document in question shall, when possible, be contacted by the Custodian of Education Records who shall review the request with the maker of the education record. The maker of the record shall respond to the student's request by completing FERPA Form 9, "Response to Student Request to Amend Education Records by the Creator of the Document." This form shall be completed by the maker of the

record and returned to the Custodian of Education Records within fourteen days after the maker of the record has received the student's request.

3. The Custodian of Educational Records shall make a determination regarding the requested amendment or correction and shall inform the student of the University's decision within a reasonable time after receiving the student's request. If the decision is to approve the request, the Custodian of Educational Records shall amend the record and so inform the student in writing. If the decision is to deny the request, the Custodian of Educational Records shall so inform the student in writing and advise the student of the right to a hearing.

M. HEARING

1. When the University denies a student's request to inspect or amend the student's education record, and upon the request of the student, the University shall provide a hearing in accordance with the following procedure:

a. The student shall file a request for a hearing with the Vice Chancellor for Student Affairs on each campus by completing FERPA Form 10A, "Request for Hearing."

b. The Vice Chancellor for Student Affairs may attempt to secure an informal resolution of the student's outstanding request, if appropriate. Any informal resolution shall be documented on FERPA Form 10B.

c. Failing to secure an informal resolution, the Vice Chancellor for Student Affairs shall designate an official of the University, who does not have a direct interest in the outcome of the hearing, to conduct the hearing.

d. Hearings shall be held within a reasonable period of time after the University has received a request for a hearing. The hearing officer shall provide the student with reasonable advance notice of the date, place, and time of the hearing.

e. The hearing shall be closed to the public.

f. The student shall be afforded a full and fair opportunity to present argument on all relevant issues and may be assisted or represented by individuals of the student's choice, including an attorney, at the student's expense.

g. The hearing officer may consider additional information relevant to the student's request, provided this information is also made available to the student.

h. The hearing officer shall render a decision in writing within fourteen days after the hearing is completed. The decision shall be based solely on argument and evidence presented at the hearing and shall include a summary of the findings and the reasons for the decision (refer to FERPA Form 10C). The decision of the hearing officer shall be final within the University.

2. If the decision of the hearing officer affirms all or part of the student's request, the Custodian of Education Records shall comply or make the necessary amendments and so inform the student in writing.

3. If the decision of the hearing officer is to deny the student's request, Vice Chancellor for Student Affairs shall inform the student in writing of his or her right to place in the education record a statement commenting on the content of the record and specifying any reason for disagreeing with the decision of the University. This statement shall be incorporated as part of the education record and shall be included in any disclosure of the record.

4. Should the student be dissatisfied with the decision of the University, the student should be advised of the right to file a complaint with the United States Department of Education.

N. DESTRUCTION OF EDUCATION RECORDS

The University may destroy or expunge any education record when it is no longer appropriate, relevant, or required. However, the University may not destroy any education record if there is an outstanding request to inspect it. A student's written explanation of any or all of the content of the student's education record, which has been placed in that record, shall be destroyed only when the information to which it pertains is also destroyed. The record of disclosure is to be maintained for only as long as the record to which it pertains is kept.

O. ACCEPTANCE OF ALL LEGAL FORMS OF WRITTEN RECORDS OR SIGNATURES

In accordance with Hawai'i Revised Statutes §489E-7, a record or signature shall not be denied legal effect or enforceability solely because it is in electronic form. The written record and signature may be in any form legally allowable under the Hawai'i Revised Statutes.

P. FEES FOR COPIES

The University may charge a fee for copies of education records that may be required in order for a student to exercise the right to inspect the student's own education record or as part of an authorized disclosure to other parties. Unless otherwise established by the University, the charge for such copies shall not exceed the cost of their reproduction.

IV. Delegation of Authority

There is no policy specific delegation of authority.

V. Contact Information

Office of the Vice President for Academic Affairs
Sandra Furuto, 956-7487, yano@hawaii.edu

VI. References

No References found

VII. Exhibits and Appendices

Appendix A: LOCATION OF EDUCATION RECORDS
Appendix B: PROCEDURAL GUIDELINES RELATED TO
SUBPOENAS

Approved

Signed

April 10, 2015

David Lassner
President

Date

Topics

No Topics found.

[+ Form Fillable Attachment\(s\)](#)

[+ Non-Fillable Attachment\(s\)](#)