CORNELL UNIVERSITY
POLICY LIBRARY

# Access to Student Information

POLICY 4.5

Volume: 4, Governance/Legal
Chapter: 5, Access to Student Information
Responsible Executive: Vice Provost
Responsible Office: University Registrar
Originally Issued: February 1991
Last Full Review:
Last Updated: July 15, 2025

## POLICY STATEMENT

It is the policy of Cornell University to comply with the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g ("FERPA").

## REASON FOR POLICY

Cornell University maintains student records and is responsible for their maintenance and release in accordance with FERPA.

## ENTITIES AFFECTED BY THIS POLICY

☑ Ithaca-based locations
☑ Cornell Tech campus
☑ Weill Cornell Medicine campuses

## WHO SHOULD READ THIS POLICY

- Faculty and staff with access to Cornell University student education records
- All university students

## MOST CURRENT VERSION OF THIS POLICY

- www.dfa.cornell.edu/policy/policies/access-student-information

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## RELATED RESOURCES

**University Policies and Information Applicable to All Units of the University**

University Policy 4.7, Retention of University Records

University Policy 4.13, Acceptance of Legal Papers

Family Educational Rights and Privacy Act (FERPA) FAQ for Faculty and Staff

Student Record Privacy Statement: Annual Notification Under FERPA

**University Policies and Information Applicable to Only Ithaca-Based Locations and Cornell Tech**

University Policy 4.4, Access to Cornell Alumni Affairs Information

University Policy 4.12, Data Stewardship and Custodianship

University Policy 5.4.1, Security of Information Technology Resources

**University Policies and Information Applicable to Only Weill Cornell Medicine Campuses**

Student Record Privacy Statement: Annual Notification Under FERPA

**External Documentation**

Family Educational Rights and Privacy Act of 1974, (20 United States Code 1232(g)) (FERPA) Title 34, Code of Federal Rights Act, Part 99

New York State Information Security Breach and Notification Act

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## CONTACTS – ITHACA-BASED LOCATIONS AND CORNELL TECH

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

*Contacts, Ithaca-Based Locations and Cornell Tech*

| Subject | Contact | Telephone | Email/Web Address |
|---|---|---|---|
| **Policy Clarification and Interpretation** | University Registrar | (607) 255-4232 | registrar.cornell.edu<br>univreg@cornell.edu |
| **Annual Notification to Students of Their Rights Under FERPA** | University Registrar | (607) 255-4232 | registrar.cornell.edu<br>univreg@cornell.edu |
| **Subpoena or Other Legal Inquiries** | University Counsel | (607) 255-5124 | counsel.cornell.edu |

## CONTACTS – WEILL CORNELL MEDICINE CAMPUSES

Direct any general questions about this policy to your college or unit administrative office. If you have questions about specific issues, contact the following offices.

*Contacts, Weill Cornell Medicine Campuses*

| Subject | Contact | Telephone | Email/Web Address |
|---|---|---|---|
| **Policy Clarification and Interpretation** | Associate Dean, Academic Affairs<br>Associate Dean, Graduate School of Medical Sciences | (212) 746-1050<br>(212) 746-6565 | sakyol@med.cornell.edu<br>gsms@med.cornell.edu |
| **Annual Notification to Students of Their Rights Under FERPA** | Associate Dean, Academic Affairs<br>Associate Dean, Graduate School of Medical Sciences | (212) 746-1050<br>(212) 746-6565 | sakyol@med.cornell.edu<br>gsms@med.cornell.edu |
| **Student Directory Information, Release of** | WCMC Registrar | (212) 746-1055 | |
| **Subpoena or Other Legal Inquiries** | University Counsel | (212) 746-0463 | |

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## DEFINITIONS

These definitions apply to terms as they are used in this policy.

| | |
|---|---|
| **Directory Information** | Term defined by FERPA to define a subset of Education Records, that includes such information as the student's email address and telephone number, which may be released without a student's consent. For a list of the items that Cornell University treats as directory information, and for instructions on how students may prevent the release of their directory information, see the *Student Record Privacy Statement: Annual Notification Under FERPA.* |
| **Education Records** | Term defined by FERPA to describe records maintained by or for the university (or a party acting for the university), directly related to a student, and containing personally identifiable information. This includes transcripts, papers, exams, student databases, class schedules, financial records, correspondence, email, and handwritten notations. Education records may be maintained in any medium. Education records do not include law enforcement or physician treatment records, which may be protected by other laws or regulations. |
| **FERPA** | The Family Educational Rights and Privacy Act of 1974. |
| **Personally Identifiable Information** | Information that would reveal the identity of a student or make the student's identity easily traceable. |

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## RESPONSIBILITIES

The major responsibilities each party has in connection with this policy are as follows:

| | |
|---|---|
| **Anyone Who Maintains or Accesses Education Records** | Maintain and release records in accordance with the dictates of FERPA. |
| **Student** | Read the *Student Record Privacy Statement: Annual Notification Under FERPA*. |
| **University Registrar** | Disseminate the *Student Record Privacy Statement: Annual Notification Under FERPA*, which tells students their rights under FERPA.<br>Manage the process by which students opt out of the disclosure of their directory information.<br>Conduct hearings to determine whether alleged errors in education records are misleading, inaccurate, or in violation of the student's privacy rights. |

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## PRINCIPLES

### Overview

Cornell University complies with the Family Educational Rights and Privacy Act of 1974 (FERPA), the federal law that covers educational records held by the university.

◆ **Caution:** If there is any conflict or inconsistency between the provisions of FERPA and this policy, the provisions of FERPA prevail.

FERPA gives students the following rights:

- to inspect and review their own education records
- to consent to disclosures of personally identifiable information contained in their education records
- to ask to have their education records corrected if they believe them to be inaccurate, misleading, or in violation of their privacy rights and, if necessary, to have a hearing on this issue
- to file with the U.S. Department of Education a complaint concerning alleged failures by Cornell University to comply with the requirements of FERPA

FERPA requires that each educational institution annually notify students currently in attendance of their rights under FERPA. Cornell University's *Student Records Privacy Statement: Annual Notification Under FERPA* **is in the University Catalog at** https://catalog.cornell.edu/policies-disclosures/ferpa-notification/.

As a general matter, the university treats its students as adults who are capable of making their own decisions regarding the exercise of their rights of access to and privacy in their education records. The university does not make routine disclosures of information to parents or legal guardians absent an authorization from the student. However, consistent with FERPA, designated Cornell officials may release information from education records to parents and others who need to know in the case of health and safety emergencies and certain other limited circumstances, such as in the case of required withdrawal from the university, more fully outlined in the *Student Record Privacy Statement: Annual Notification Under FERPA*.

### Responsible Access and Use of Education Records

Anyone who maintains or accesses education records on behalf of the university is responsible for using those records in compliance with FERPA and this policy.

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## PROCEDURES

### Releasing Education Records

Education records may be released only with the signed consent of the student, except where FERPA authorizes disclosure without consent, as detailed below.

Personally identifiable information from an education record may be disclosed without consent, under the following conditions:

1. The information is Directory Information. For a list of the items that Cornell University treats as directory information, and for instructions on how students may prevent the release of their directory information, see the *Student Record Privacy Statement: Annual Notification Under FERPA*.
2. To a university official with a legitimate interest in this information, as defined in the *Student Record Privacy Statement: Annual Notification Under FERPA.*
3. To appropriate parties in a health or safety emergency if knowledge of this information is necessary to protect the health and safety of the student or other individuals. See the FAQ.

◆ Consistent with FERPA, information from education records to parents and others who need to know in certain limited circumstances, more fully outlined in the *Student Record Privacy Statement: Annual Notification Under FERPA* **Note**: FERPA contains several additional narrow exceptions to the requirement of obtaining a student's consent before disclosing information from education records. A unique set of conditions delineated in FERPA applies to each type of disclosure. See the FAQ for more information about these exceptions.

If you have a question about the permissibility of disclosing information, contact the University Registrar or the Office of University Counsel.

### Student's Inspection of Education Records

A student may inspect and review their own education records after submitting a written request to the University Registrar. The request must identify the education record(s) desired. An appropriate university staff person will make the needed arrangement for access promptly, and notify the student of the time and place where the education records may be inspected. Access must be provided within 45 days of receiving the request.

## PROCEDURES, continued

### Recording Requests for Release of Information

As a general rule, anyone releasing education records (other than directory information) to a third party (i.e., someone other than the student or a university official with a legitimate interest in the information) without the consent of the student must maintain a record of the request for and/or release of this information. The record will indicate the name of the party making the request, any additional party to whom it may be re-released, and the legitimate interest the party had in requesting or obtaining the information.

### Correcting Education Records

Specifically regarding correcting education records, FERPA gives students the following rights:

- To ask to have corrected education records that are believed to be inaccurate, misleading, or in violation of the student's privacy rights; *upon this request, the university will correct the records if they are determined to be inaccurate, misleading, or in violation of the student's privacy rights*
- To a hearing appealing a decision by the university not to make the requested change; *after the hearing, if the hearing officer supports the student's appeal, the records will be amended as requested*
- To receive a written explanation of a decision by the hearing officer that the records are not inaccurate, misleading, or in violation of the student's privacy rights
- To place a statement with the education records in question, in the event that the university does not amend them

Contact the University Registrar for the current procedures for correcting education records.

If a student's statement to contest any education records is placed with those records, it will be maintained as part of the education records as long as the contested portion is maintained. If the contested portion of the education record is disclosed, the statement must be disclosed with it.

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