

Notice of Rights under the Family Educational Rights and Privacy Act (FERPA)

Pursuant to the Cleveland Clinic School of Health Professions' (SOHP) Family Educational Rights and Privacy Act (FERPA) Policy (the "Policy"), the following notice is provided to SOHP students. Terms used in this notice have the definitions set forth in the Policy.

Participants in SOHP educational programs and activities who are enrolled as students in an affiliated educational institution should refer to their educational institution's FERPA notice for information regarding how to access their education records. SOHP shall cooperate with affiliated institutions to provide education records as required under the applicable affiliation agreement and applicable law and regulation.

FERPA affords students certain rights with respect to their education records. These rights include:

1. The right to inspect and review the student's education records within forty-five (45) days after the day SOHP receives a request for access. A student should submit to the Registrar a written request that identifies the record(s) the student wishes to inspect. The Registrar will make arrangements for access and notify the student of the time and place where the records may be inspected.
2. The right to request the amendment of the student's education records when the student believes the record is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

A student who wishes to ask SOHP to amend a record should submit a written request to the Registrar, clearly identifying the part of the record the student wants changed and specifying why it should be changed.

If SOHP decides not to amend the record as requested, SOHP will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

3. The right to provide written consent before SOHP discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent.
4. SOHP discloses education records without a student's prior written consent under the FERPA exception for disclosure to SOHP or Cleveland Clinic officials with legitimate educational interests. For the purposes of FERPA, a SOHP official is any Cleveland Clinic employee working in a health professions education program; a person serving on any health professions education board or advisory committee; a student serving on an official committee; and a volunteer or contractor outside of SOHP who performs a function for which SOHP would otherwise use its own employees and who is under the direct control of

the school with respect to the use and maintenance of PII from education records. An SOHP official typically has a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibilities.

Upon request, SOHP also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

5. The right to file a complaint with the U.S. Department of Education concerning alleged failures by Cleveland Clinic or SOHP to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

FERPA permits the disclosure of PII from students' education records without consent of the student if the disclosure meets certain conditions found in the FERPA regulations. SOHP is required to maintain a record of disclosures, except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information, and disclosures to the student. Students have a right to inspect and review the record of disclosures.

Directory Information

FERPA also permits the disclosure of appropriately designated "directory information" without written consent. SOHP has designated the following information as directory information:

- Student's name
- Address
- Telephone listing
- Electronic mail address
- Photograph
- Date and place of birth
- Program/field of study
- Dates of attendance
- Current year of study
- Participation in officially recognized activities
- Degrees, certificates, honors, and awards received
- The most recent educational institution attended prior to entering their current program
- Cleveland Clinic ID number

If you do not want SOHP to disclose any or all of the types of information designated above as directory information without your prior written consent, you must notify the Registrar in writing.