Policy and Practice in Student Records

MIT is an institution renowned for being forward-thinking and ahead of the curve

in many fields. In this paper, I propose a way in which MIT can apply this attitude

towards its treatment of student records. I begin with a discussion of the Family

Educational Rights and Privacy Act of 1974, or FERPA, and its implementations at

Stanford, UC-Berkeley, Harvard, and MIT. I then discuss what I learn in requesting as

many of my records as I can, in hopes of seeing how well these policy works in practice,

and what can be done to improve the system. Finally, I conclude with a recommendation:

MIT should strive for greater transparency in student records, by which I mean, it

should be straightforward and simple for students to access their records and understand

how they are being used. This can be accomplished with three steps: First, MIT should

make a stronger effort to educate the student body as a whole. Second, the different

offices at MIT should contribute to a centralized list of records, updated on a regular

basis. Third, the Ombuds office, along with the Committee on Student Information

Policy, should be charged with  helping students with complaints or inquiries about their

records.

**Background on FERPA**

Any discussion of transparency in student records would be incomplete without

addressing FERPA. The Family Educational Rights and Privacy Act (20 U.S.C. s. 1232g)

was promulgated in 1974, and has an associated set of federal regulations (34 C.F.R. Part 99). Known also as the Buckley Amendment, after its principal sponsor, Senator James Buckley (R-NY), FERPA was decidedly the product of a post-Watergate push towards greater accountability and transparency in government and large institutions[1]. FERPA essentially allows students and parents to view education records that a given university has on them, conditioning federal funding for an institution on compliance with these rules. Furthermore, FERPA also generally requires that schools get written permission from students before releasing information from their records, with certain exceptions. Nothing forces all universities to comply with FERPA; only institutions that receive funding from the Department of Education are subject to its provisions. As a practical matter, though, this covers nearly every educational institution.

One important element of FERPA is that students have the right to review their own education records and ask for corrections if they discover inaccuracies. If a school declines to make the correction, the student is entitled to a formal hearing with the school. After the hearing, if a correction is still not made, the student is allowed to supplement the record with a statement elaborating his or her position on why a correction is in order.

Another important aspect of FERPA is its protection against the release and dissemination of education records. By and large, a school must obtain written

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1 Shiley, Courtney. "Putting the Rights into the Family Educational Rights and Privacy Act."

permission from a student before releasing his or her records, except for[1]:

- School officials with legitimate educational interest;
- Other schools to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for or on behalf of the school;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities, within a juvenile justice system, pursuant to specific State law.

Before we go on, there is a term we must define: "education records." Under

FERPA, education records are defined to be any records that are directly related to a

student and maintained by the school. However, education records do *not* include private

records made by administrators for their own personal use, so long as they are not shared

with anyone else. The term also does not include law enforcement records, and records

made about a student in his or her capacity as an employee.[2]

However, there are certain records that do not fit into this class of "education

records" -- these are known as "directory information," and may be disclosed without *a*

*priori* student consent. The criterion for directory information is that it is "information

contained in an education record of a student which would not generally be considered

harmful or an invasion of privacy if disclosed." The term can include, but is not limited

to, name, address, phone number, date and place of birth, major, and weight and height if

on an athletic team. Students do have recourse, though – they can request that the school

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1   Department of Education. "Family Educational Rights and Privacy Act"
2   34 C.F.R. 99

not disclose their directory information, and they must be reminded annually of their right

to do this.[1]

**FERPA Implementation - Stanford**

Now that we've reviewed the main provisions of FERPA, let's examine its actual

implementation at a few universities, beginning with Stanford. Stanford's academic

policies and statements merely reiterate the rights accorded to students under FERPA, but

do not provide any additional ones[2]. However, Stanford does invoke a broader

interpretation of directory information; noteworthy inclusions that do not appear in

FERPA's example set of directory information are the permanent address, high school,

and ID card photographs (with the caveat that the photographs are only directory

information with the caveat that they are for classroom use). What's more, the policy goes

on to note that "Registration as a student and attendance at or participation in classes and

other campus and University activities constitutes an agreement by the student to the

University's use and distribution (both now and in the future) of the student's image or

voice in photographs, videotapes, electronic reproductions, or audiotapes of such classes

and other campus and University activities."[3]

Is this extended definition of directory information noteworthy? Not necessarily

in and of itself; however, these definitions give us a better framework in which to analyze

MIT's definitions. If no university considered photographs to be directory information,

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1  Id.
2  Stanford University. "Student Record Privacy."
3  Id.

for example, and then MIT did, we would be right to be a little suspicious. We will

examine definitions of directory information across these four universities soon.

**FERPA Implementation - Berkeley**

The University of California at Berkeley has a long and comprehensive student

record policy. In addition to compliance with FERPA, the policy is guided by two

underlying principles:

> (1) the privacy of an individual is of great weight, and
> (2) the information UC Berkeley maintains about a student should be
>     disclosed to the student upon request.[1]

The fact of the matter is that Berkeley's policies do not really grant any additional

privileges beyond FERPA. There are, of course, a few exceptions: a provision that says

that records cannot be destroyed if they are in the process of being requested, for example.

The important thing, though, is that the Berkeley policy is one long document that is self-

contained. While the Stanford policy is essentially "Go read FERPA and its associated

regulations if you want to learn your rights," Berkeley is more straightforward, explicitly

stating what is and what is not allowed, without requiring the reader to reference any

other documents. This is extremely important for policies that involve students: the

Stanford student must seek out and read FERPA and its associated case law to learn his

rights (something the average student is unlikely to do), whereas the Berkeley student

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1    University of California, Berkeley. "Disclosure of Information from Student Records."

only needs to consult one document.


**FERPA Implementation - Harvard**

Next, we examine FERPA at Harvard. At Harvard, education records, while

accorded the protection of FERPA, fall into the broader category of confidential records,

and are dealt with as such[1]. Harvard's approach is distinct from Berkeley's and Stanford's

in that its policies focus not as much on governing the principles behind the release of

information, but focus more on the actual practice. An example: "Confidential data

transported over a network must always be encrypted. Secure web browsers running SSL

or TLS or using a VPN meet this requirement."[2]

However, not all of Harvard's policy is strictly technical implementation. The

policy does reference FERPA, and goes beyond Stanford by defining many of the terms

that would otherwise seem like jargon (to include "directory information"). In sum total,

though, the policy does not seem especially different than Stanford or Berkeley. One

interesting fact to note, though, is that the different schools *within* Harvard University

may use different definitions for directory information, for example, which is fairly

confusing.

But why is there such a focus on security of information at Harvard, and less so

on the actual policies? "In general, faculty members have been concerned about student

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1   Bradner, Scott, University Information Security Officer, Personal communication. 28 Nov. 2005.
2   Bradner, Scott. "Harvard University Information Security & Privacy."

records but have not had concrete guidance," said Scott Bradner, University Information

Security Officer at Harvard University, and as a result, have, without malicious intent,

done things like "publish lists of grades using Harvard ID numbers as keys, which is

explicitly prohibited in the rules, and has been for a few years."

So now, the focus is on a university-wide project, whereas historically, issues of

policy and security for student records were left in a decentralized, school-by-school

fashion, which led to incidents such as the one described above.


**FERPA Implementation - MIT**

Like Berkeley, MIT has a comprehensive and explicit policy that describes exactly

how it interprets FERPA[1]. A few things are especially noteworthy: First, MIT is more

inclusive about its definition of what constitutes an education record (what MIT refers to

as a "student record"), including:

- Admission information for those students accepted by, and who enroll at MIT;
- Biographical information including date and place of birth, gender, nationality, information about race and ethnicity, and identification photographs;
- Grades, test scores, courses taken, academic specialization and activities, and official communications regarding a student's status;
- Course work including papers and exams, as well as communications that are part of the academic process between a student and the teaching staff, and between a student and other students in the class;
- UROP and internship program records;
- Students' financial and financial aid records;

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1   Massachusetts Institute of Technology. "Student Information Policy."

- Disciplinary records.[1]

Most interesting here is the explicit inclusion of student course work as a protected record – a class of documents that the other information policies do not address. MIT's explicitness about what exactly constitutes an education record is a step in the right direction – it is hard to understand the policies governing student records if it isn't clear what the records are.

How does MIT's definition of directory information compare with others? Appearing below is a table that indicates what each university considers to be "directory information."

|  | Harvard[2] | Stanford | Berkeley | MIT |
|---|---|---|---|---|
| Name | X | X | X | X |
| Home address | X | X | X | X |
| Home phone number | X |  | X |  |
| Date of birth | X | X | X |  |
| Place of birth |  | X | X |  |
| Term address | X | X | X | X |
| Term phone number | X | X | X | X |
| E-mail address | X | X | X | X |
| Office address | X | X | X | X |
| Dates of attendance | X | X | X | X |
| Degree and date | X | X | X | X |
| Major / minor | X | X | X | X |
| Honors | X | X | X |  |

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1    Id.
2    Different schools within Harvard have different definitions of "directory information". This definition is for the Harvard Faculty of Arts and Sciences student handbook.

|  | *Harvard* | *Stanford* | *Berkeley* | *MIT* |
|---|---|---|---|---|
| Institution previously attended | X | X | X |  |
| Photograph | X | X | X |  |
| Units enrolled |  |  | X |  |
| Height and weight for sports participants | X | X | X | X |

In comparing MIT's definition of directory information with that of other

universities, we do not see too many differences. One important thing to note is that

photographs fall into the category of education records in MIT's book, but the policy

notes that they will be distributed to the relevant faculty (e.g. professors may get lists and

photos of the students in their class). In effect, the policy is not substantially different

from those at the aforementioned universities, though the classification of the photo itself

is not the same.

Why is this analysis instructive at all? It tells us something very important: MIT is

not a significant outlier in its interpretation of FERPA. If it were, we would have a slight

cause for concern – FERPA, as written, embraces the tenets of transparency that we

should be trying to further. By comparing MIT's interpretation of FERPA with

interpretations at other universities and finding it similar, we can assure ourselves that

MIT is not shortchanging its students rights that would be accorded to them elsewhere.


**Records at MIT**

So we've seen that MIT, on paper, follows the spirit of FERPA acceptably, when

compared with other universities. But the fact of the matter is that a paper policy is not

the be-all and end-all of student records; how transparent are records in practice? That is,

can students easily access them and correct errors, if they so desire? Is it easy for students

to learn what rights they have with regard to their records, and to seek redress if those

rights are believed to be violated?

If we really want to make insightful and valuable recommendations for how MIT

should change, we need to know the specifics of how the policy works in practice. To this

end, I set about requesting as many of my records as I could find. The problem is that

records at MIT are strongly decentralized; there is no one repository or vault to open up.

Appearing below is where most records at MIT can be found[1]:

| Record Type | Where to find it |
|---|---|
| Admissions | Admissions office |
| Financial | Student Financial Services<br>Daniel Barkowitz |
| Academic | Registrar's office<br>Connie Scribner |
| Departmental | Depends on department. |
| UROP (Research) / First Year | Office of Academic Services<br>Michael Bergren |
| Residence | Housing Office<br>Undergraduates: Robin Smedick<br>Graduate Students and Families: Alicia Hunt |
| FSILGs | Student Life Programs<br>David Rogers |

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1    Scribner, Constance, Associate Registrar. Personal communication. 23 Nov. 2005.

| Record Type | Where to find it |
|---|---|
| Library | Self-service tool for students called Your Account<br><br>Records are purged within seven days of the return of items unless there are outstanding fines |
| Discipline | Office of Student Conduct and Risk Management<br>Yvonne Doyle |
| MIT Card | Send Request to MIT Card Services.<br>Examine Privacy Policy on Card Services site. |
| Computing | MIT server  User Accounts |

As of this writing, I have received academic, UROP, residence, and financial

records, as well as admissions and MIT card records, from a previous inquiry. The Office

of Student Conduct was not so forthcoming; they simply stated that I had no disciplinary

records but did not elaborate. In any case, for the most part, the records are exactly what

you would expect:

The registrar's records are the transcript as well as copies of forms submitted to

the office: registration, add/drop forms, change of major, etc. It's worth noting that

maintaining such a sheer volume of paper records is basically impossible in the space of

the Registrar's Office, so what in fact happens is that the paper forms themselves are

stored off-site[1] (since they are essentially useless from the standpoint of the registrar,

given that all the pertinent information also exist electronically). For the most part, any

information in the registrar's office is also accessible by students over the Internet, via a

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1   Scribner, Constance, Associate Registrar. Personal communication. 30 Nov. 2005.

Web site that accesses MITSIS, MIT's Student Information Services database.

The records maintained by Housing are essentially an archive of email, backed up regularly in a FileMaker database[1]. This works well, given that most of the business of the Housing Office is transacted over email. The entirety of the records were emails I had either sent to the Housing office or received from them, and fell into three categories: e-mails I had sent or received to decide my own housing, e-mails I had exchanged with Housing in my capacity as a chair for my dormitory, and e-mails I had exchanged with Housing in my capacity as a reporter for the student newspaper, *The Tech*.

The Academic Resource Center is an interesting office, in terms of the records it maintains. For freshmen, virtually all of the advising information is stored there, and most can be viewed by the student from the Internet, from one centralized location. Examples of items maintained here are AP scores, freshman entrance exam scores, eligibility for sophomore standing, fifth-week flags if a student is in danger of failing a class, the hidden first-semester freshman grades, etc. For the most part, these records are stored electronically. At the end of a student's freshman year, some records are destroyed (like the hidden grades), and others get transferred to the student's new departmental advisor[2], since, at that point, the student will have chose a major. In addition to first-year records for freshmen, the Academic Resource Center maintains the paperwork for the UROP program, as well as the records for the Committee on Academic Performance:

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1 Smedick, Robin, Assistant Director for Undergraduate Housing. Personal communication. 2 Dec 2005.
2 Norman, Julie, Associate Dean for Academic Resources and Programming. Personal communication. 2 Dec 2005.

records that include petitions submitted by students.

The big-ticket item maintained at the Admissions office is the E-3 card: essentially, a summary of one's application to MIT. The card has two portions: the top contains numerical information and scores, and the bottom contains comments by the readers of the application. The bottom portion is typically destroyed at some point between admittance of a student and the end of his or her freshman year; sometimes as early as the summer before the students arrive. The top persists for five years, at which point it is copied into microfiche and an electronic repository, and then destroyed.[1]

The MIT Card Office maintains some biographical information about cardholders, but more significantly, retains the last 14 days' worth of card accesses in their database. To access these records, a visit to the Card Office is required. In addition, a record of your purchases with Tech Cash, the currency linked to the MIT Card, is available on the Web.

What is noteworthy here? First of all, each office has its own system for the maintenance and upkeep of records. Some of these systems are accessible over the Web, others are not. The important thing, though, is that they are different and located at various places, and nearly impossible to integrate without detracting from the ability of each office to function efficiently on a day-to-day basis.

**MIT's Successes**

1    Daher, Waseem. "Students May Access Records." <u>The Tech</u>.

To its credit, MIT has long been concerned with the issues of student privacy, and is one of the first universities to address the issues of privacy of student records, well before FERPA became law[1]. In fact, as early as 1968, an Ad Hoc Faculty Committee on Privacy was formed to address the growing concerns over computerized records, timesharing, and how their intersection might be detrimental to student privacy. Shortly thereafter, MIT assembled a presidential Committee on Privacy to investigate the implications of the widespread use of social security numbers as unique identifiers around MIT. In addition, the Committee on Privacy served as a mediator between students and faculty members for issues regarding student privacy.

One example of this mediation involved a department that posted student grades with their names, repeatedly, and throughout the department. After students complained, the Committee on Privacy was able to work with the department to get them to change their ways[2].

In addition, this spirit of forward thinking and proactive change can be seen in the current incarnation of the Student Information Policy. Published in 1999, the new SIP was designed to put forth a policy that was ready to cope with a world dominated by electronic records. FERPA was designed with paper records in mind; the SIP was supposed to be a document that embraced the principles of FERPA, made them a little more stringent, and adapted them to technological changes.[3] This trend continues to this

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1    Meldman, Jeff. Personal communication. 28 Nov. 2005.
2    Id.
3    Callahan, Mary, Registrar. Personal communication. 22 Nov. 2005.

day, with the presidential Committee on Student Information Policy re-examining student records and the issues surrounding them.

Not only does MIT stand well on its own, its policy seems to compare favorably to those of the other universities mentioned above. Like Berkeley's, it is explicit about the rights accorded to students, and does not require them to research the ins and outs of FERPA to determine what they can and cannot do. In addition, it takes the additional step of requiring offices to provide copies of records to students, if requested. While this is not a particularly amazing right in and of itself, it demonstrates a commitment to openness and convenience for students on the part of MIT.

**MIT's Shortcomings**

While MIT does a lot of things right, it is hardly perfect. One major flaw with student records at MIT is their lack of centralization. It would be a bureaucratic nightmare to force all student records to be consolidated somewhere – and that is not what is being suggested – but as a consequence, no one person really knows about all the records that exist, and trying to compile such a list borders on the impossible. We see this in practice in my attempt to request my records: each office has its own special way in which it keeps various records, and these systems are hardly interoperable.

What's more, while MIT's compliance with FERPA and its own policies is spectacular on paper, the reality is sometimes not so beautiful. The fact of the matter is

that when offices maintain records, they do so for their own reasons – they need them for something. Their first and foremost concern is their own use of the records, not their compliance with FERPA or the MIT SIP. As a consequence, they are typically not set up in a manner convenient for requesting:

Case in point: In early October 2003, I requested my E-3 card from the Admissions Office as part of an article for *The Tech*. Initially, I was told no, but with a little more persistence, I was successful. E-3 card requests were rare, so the process was by no means optimized for it; cards had to be reviewed individually, and certain reader comments had to be redacted if they were quotations from a confidential letter of recommendation, which they often were. As a result, compliance was a slow and laborious process for all parties involved, and created much additional work for the staff. The situation became even worse when 700 other freshmen put in similar requests.

However, at least the system worked here: the requests were responded to and people got their records. As a result, the E-3 card requesting process is much more streamlined, and requesting it is now a five-minute process. (Though, the solution to the problem was just to destroy the comments section of the card before freshmen arrived on campus).

Unfortunately, this is not always the case. The genesis for my request of my E-3 card was a tip I received from a student who had just graduated. In his final year at MIT, he wanted to review all of the records that MIT had made on him, to ensure their

accuracy. No one is denying his right to see those records, but the fact of the matter is that

most offices would prefer not to deal with such requests at all, if they didn't have to.

This student's initial attempt to get all of his records was met with stonewalling,

for the most part. In late August, the student recounts the following tale: In early June, he

hand-delivered a letter to the Department of Undergraduate Education, requesting a copy

of all of his records. He received a response that his "request would be impossible to

fulfill because MIT decentralizes their record keeping and because it would be impossible

to identify all of the various locations where my records are maintained."[1]

In short, his request was basically ignored. To make matters worse, one record

that he requested was his E-3 card. As I stated earlier, these are typically destroyed after

four or five years; it just so happened that his was scheduled for destruction, and

destroyed, in July. However, the Student Information Policy states that "No educational

record may be destroyed if there is an outstanding request to inspect or review it." So not

only was his request ignored, but one of the records he was attempting to retrieve was

also destroyed.

All in all, this case represents a clear failure of the system. Why did this end up so

badly? On the one hand, there was an unlucky coincidence: the time of his request

roughly coincided with the scheduled destruction of his admissions file. However, more

importantly, this example illustrates a problem at MIT: advocating transparency in student

records is something that no one really wants to do. No one is really there to ensure that

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1   Document provided to me by the student in question, from August 29, 2003

requesting records is a simple process. Individual offices feel no need to optimize their filing systems for this end, so in effect, no one is looking out for this interest of the students.

**Recommendations**

How can we improve the way student records are handled at MIT, in an attempt to make things easier for students and prevent incidents like the one recounted above? Three steps are necessary: first, greater effort towards educating the student body. Next, some sort of centralized list of records, updated regularly. Finally, making it someone's responsibility to help students with issues about records.

One major hindrance to transparency in student records, that is, giving students the right to review and correct their records and allowing students to influence when these records are released, is ignorance on the part of the students. Students simply do not know their rights and rules when it comes to their records. To fix this, MIT must make an active effort to educate students about their rights, rather than being content with simply writing up a lengthy policy and including it in a book somewhere.

Luckily, steps are already being taken by MIT to ameliorate the situation. The Committee on Student Information Policy has already created a summary pamphlet for faculty and staff, containing frequently asked questions about MIT's policies. The reality of the situation is that oftentimes faculty are just as ignorant of MIT's policies as the

students are, and as a consequence, they take actions that could potentially violate FERPA and the SIP. A companion document is in the works for students, informing them of their rights under the Student Information Policy, in a concise and accessible form, over the Internet.[1]

Second – and perhaps the most onerous of these recommendations – a centralized list of records needs to be maintained. While MIT's decentralized record-keeping nature is convenient and useful from a bureaucratic standpoint, the problem is that it is *too* decentralized when anyone needs to get a full set of records on a given student. While clearly consolidating all of the records in one place is not the right solution, by any means, a simple registry of what-is-stored-where, updated semiannually, does not seem like too much work.

This type of document is absolutely necessary, though, if our goal is to allow students to review their records. Even if students know that they can access their records under FERPA and the SIP, that information is useless if they have no idea what records exist. For example, I had no idea that the Admissions Office maintains a card about your application to MIT; consequently, I would have never thought to try requesting it, even though I was aware of the rights given to me by FERPA and MIT's policies. Once I was successful, 700 other freshmen tried the same thing – clearly demonstrating that there was desire to see this record, just that no one knew of its existence.

The actual document update process would work something like this: Twice a

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1   Romano, Ri, Associate Registrar. Personal Communication. 22 Nov. 2005.

year, each office will send a list of all the records it maintains to the MIT Ombuds Office,

which would compile a list and make it accessible on the Web. These would not be

specific student records; just examples of records that could exist on a given student. So,

the MIT Card Office would submit an entry like"We record the last 14 days' worth of

door accesses in our office; come here to get them," and the Admissions Office would

submit an entry like "We keep a summary card of your application to MIT for five years;

come here to retrieve it," for each of its records, for example.

Updating a document like this twice a year seems fairly trivial, especially since

the majority of the records are fairly static – presumably the records that are kept from

year to year are relatively consistent. Why the Ombuds office? The perfect office for the

job is one which is neutral and divorced from these other administrative offices – and the

Ombuds office fits that description perfectly.

Lastly, in addition to compiling a list of records semiannually, the Ombuds office

should collaborate with the Committee on Student Information Policy to make itself a

resource to students with questions and issues about student records. As it stands right

now, the CSIP largely attempts to fulfill this role on its own. Unfortunately, while their

intentions are good, it is difficult for them to accomplish a great deal without an office,

staff, or budget; after all, they are just volunteers. The hope is that with some support

from an office, the CSIP can become the go-to organization that the Committee on

Privacy (which had a budget) once was. The Ombuds office also makes a good choice

here because, again, they are divorced from any record-keeping, and have no interest in

not helping students.

The problem with FERPA and SIP in general is that enforcement is virtually

impossible. No one is keeping an eye out for the interests of the student, and there is no

real place set up to receive complaints and deal with them. We see this first-hand in the

story recounted above. The hope is that in giving the CSIP some resources to work with,

they will be able to tackle this problem more effectively: students will be able to turn to

them, and they will be experts with the ability to help them out.


To conclude: MIT has done a lot right in its handling of student records. Its policy

compares favorably with those of Stanford, Berkeley, and Harvard: It is explicit about the

rights accorded to students, and its policies are consolidated and unambiguous. However,

while MIT does many things right and may be near perfect on paper, the reality is, of

course, not quite as good. While privacy and transparency in student records are not

necessarily the highest priorities at an institution, with a few simple steps, MIT can

greatly improve the situation: Additional effort to educate both students and faculty about

their rights and obligations, a centralized list of records so that everyone is aware of what

types of information are being collected and are available for viewing, and finally, making

an office responsible for serving as a watchdog and ally for students who feel

disenfranchised or just need help exercising their rights.

However, these recommendations are not a panacea. One issue that is unaddressed by these recommendations is the actual security of records. It is irrelevant if the policies underlying student record management are stellar if the security on them is sufficiently weak such that no one is, or can be, held accountable when important and sensitive records are leaked. This is the issue that Harvard seems to be addressing in its student record / confidential information policy, and is one that MIT should consider investigating as well. However, this is largely a technical challenge, not a policy one: How can we secure information in a robust and technically sound way, but in such a manner that does not inconvenience people to the point that no one will use it?

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