

## **Policy 930 Education Records Privacy and Release**

**Policy Number: 930**

**Effective Date: 6/1/16**

**Revised Date: 7/13/17; 11/09/2020; 07/31/2025**

### **Scope**

This Policy on Education Records Privacy and Release applies to faculty, staff, students, summer scholars and applicants (“Covered Individuals”) of The Graduate School of the Stowers Institute for Medical Research (“The School”) and officials of the Stowers Group of Companies (“SGC”).

### **Policy**

The School conforms to standards established and accepted in higher education to protect the privacy of education records and provide rights to students and their families with regard to access and privacy of academic records. This policy is designed to protect the privacy of education records of students who are currently or formerly enrolled. Education records of students who have applied to, but have not attended the School, are not subject to protections under this policy. It is the School’s policy that no records of deceased doctoral researchers be released to third parties outside the context of this Policy, unless specifically authorized by the executor of the deceased’s estate or by the next of kin.

The School provides the following rights to predoctoral records with respect to their education records:

- *The right, with some limitations, to inspect and review their education records within 45 days of the day the School receives a request for access*  
Students should submit a “Student’s Request to Inspect Education Records” form to the School office to identify the record(s) they wish to inspect. The School staff will make arrangements for access and notify the student of the time and place where the records may be inspected.
- *The right to request to amend the student’s education records that the student believes are inaccurate or misleading, or otherwise in violation of the student’s privacy rights.*  
Students should write to the Dean for Administration & Registrar and name the record in question, clearly identify the part of the record they want changed, and specify why it is inaccurate or misleading or should be changed. If the School decides not to amend the record as requested by the student, the School will notify the student of the decision and advise the student of their 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.
- *The right to limit disclosure of personally identifiable information contained in the student’s education records, except to the extent that this policy authorizes disclosure without consent.*

The School discloses educational records without a student's prior written consent for disclosure to School officials with "legitimate educational interests." A School official has a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibilities for the School. Examples of people who may have access, depending on their official duties, and only within the context of those duties, include:

- A person employed by a SGC entity in an administrative, supervisory, academic, research, or support staff position (including security personnel and health staff)
- A person or company employed by or under contract to a SGC entity to provide a service instead of using the School employees or officials (e.g., third-party service providers of electronic education modules and/or tools, attorneys, auditors, etc.)
- A member of any SGC entity Board of Directors
- A person serving on a School committee, such as a disciplinary or grievance committee
- A person assisting a SGC official in performing their tasks

Additionally, the School can release information from the student's education record without consent as follows:

- Directory information (unless a "Directory Information Restriction Form" is filed with the School)
- To federal officers as prescribed by law
- As required by state law
- To federal, state or local authorities involving an audit or evaluation of compliance with educational programs
- In connection with federal funding, including Veterans' benefits
- To organizations conducting studies for or on behalf of educational institutions, providing that the agencies guarantee no personal identification of students
- To accrediting and state certification organizations
- To comply with a judicial order or lawfully issued subpoena<sup>1</sup>
- In a health or safety emergency
- Results of a disciplinary hearing to an alleged victim of a crime of violence
- By security personnel to other law enforcement agencies in the investigation of a specific criminal case
- To parents/legal guardians of students who are dependents as certified according to IRS standards<sup>2</sup>

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<sup>1</sup> Subpoenas issued by courts outside the state of Missouri may be required to reissue the subpoena through a court within the state of Missouri (with the exception of certain federal court orders). Students are generally notified when their records have been subpoenaed.

<sup>2</sup> At the post-secondary level, parents have no inherent rights to inspect a student's education records. Parents may obtain directory information at the discretion of the School. Parents may obtain non-directory information if the student provides written consent. Parents also may obtain non-directory information at the discretion of the School and after it has been determined that the student is a legal dependent (by Internal Revenue code) of the parent requesting the information. The parent will need to provide to the School a copy of their most recent Federal Income Tax return to document the student's dependent status.

- A student's parent(s) or legal guardian(s) regarding the student's use or possession of alcohol or controlled substance if it has been determined by the School that the student's use or possession of alcohol or controlled substance constitutes a violation of a School rule or regulation; and the student is under the age of 21 at the time of disclosure to the parent(s) or legal guardian(s)
  - In connection with an emergency, to appropriate person if the knowledge of such information is necessary to protect the health or safety of the student or other persons
  - To educational agencies or institutions that request records when a student seeks to enroll or is already enrolled
- *The right to be notified of Records Privacy and Release rights at least annually*

### **Additional Definitions**

“Education records” are records that are (1) directly related to a student and (2) maintained by the School, or a party acting for the School (if certain conditions are met), and include such records in any medium (e.g., handwritten, printed, electronic, video, or audio recordings). This includes transcripts or other records obtained from a school in which the student was previously enrolled. A student has the right of access to their education records, with the exceptions of information about other students, financial records of parents, and confidential letters of reference to which the student has waived access.

Additionally, the following information is not considered part of an education record:

- Sole possession records or private notes held by a School official that are not accessible or released to other personnel
- Law enforcement or security records that are solely for law enforcement purposes and maintained solely by law enforcement or the SGC Security Department
- Employment records where employment is not connected to student status
- Records related to treatment provided by a physician, psychiatrist, psychologist or other recognized professional or paraprofessional and disclosed only to the individuals providing treatment
- Alumni records created after the student graduated from or left the School

The School defines “directory information” as a student’s:

- Name
- Local and home addresses
- Telephone numbers
- Email addresses
- Dates of attendance
- Enrollment status
- Educational institutions attended
- Participation in officially recognized activities
- Degrees, certificates, awards, and honors received

- Expected graduation date
- Thesis laboratory
- Photographs taken for School purposes such as website use and marketing materials

A student has the option to request that some or all directory information be restricted. In order to maintain directory information as confidential, a student must sign a “Directory Information Restriction Form” and submit it to the School. This restriction will be in effect when it is received by the School and until a student amends a form and signs it, and submits the amended form to the School. Students who submit a Directory Information Restriction Form should note that this action will exclude their name from certain School publications, but would not exclude their image from photographs/recordings of public events/appearances such as graduation ceremonies, symposiums, scientific meetings, etc.

For additional information, contact the Dean for Administration & Registrar.

This policy was approved by the GSSIMR Board of Directors on September 5, 2018.

This policy was last updated by the GSSIMR Board of Directors on November 09, 2020.

This Policy was reviewed by the GSSIMR Board of Directors on September 18, 2024.

This Policy was reviewed and amended by the GSSIMR Board of Directors on September 18, 2025.

This policy will be reviewed again by the GSSIMR Board according to the annual policy review schedule.