

Applies to: *This Policy applies broadly to the entire University community, including students who are registered or enrolled in University classes or in one of the University's degree or non-degree programs ("Students"); all full-time and part-time faculty ("Faculty"); all non-faculty University employees, including University Staff, Keck Medicine employees, professional research staff, and post-doctoral fellows ("Staff"); and contractors, vendors, visitors, guests, or other individuals who are participating in or seeking to participate in the University's education program or activities ("Third Parties").*

1. Student Records

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2. Policy Purpose

It is the policy of the university to protect the privacy of student education records and to comply with the requirements of the Family Educational Rights and Privacy Act of 1974 (FERPA).

3. Scope and Application

This policy applies to all Education Records maintained at the university.

4. Definitions

Click or tap in the grid to defines terms specific to this policy.

Term	Definition
Covered Personnel	All University Officials, Faculty and Staff, as well as Students and Third Parties who are assigned specific responsibilities by the University that grant them access to Education Records other than their own, whether as a result of possession of physical keys or keycard access to locations containing physical copies of Education Records, or online credentials allowing access to digital copies of Education Records. This may include resident assistants; virtual peer mentors; designated student leaders, such as Trojan Marching Band squad leaders and section leaders and Student Athletic Academic Services (SAAS) tutors; or leaders and members of other student programs.
Education Records	Any record (in handwriting, print, audio or video tape, film, electronic or other medium) maintained by the university (or an agent of the university) which is directly related to a Student. Information that is captured as a result of a Student's various activities at the university is part of the Education Record. This information includes, but may not be limited to, logs, databases or other records of: websites the Student has visited, purchases made at university facilities, entry day/time into university facilities, university library use and biometric records.

	<p>The term “Education Record” does not include:</p> <ol style="list-style-type: none"> 1. Sole Possession Records: Records of instructional, supervisory, administrative and educational personnel ancillary to those persons that are kept in the sole possession of the maker and are not accessible or revealed to any other person except a temporary substitute for the maker of the record. 2. Employment Records: Employment records of an individual whose employment is not contingent on the fact that they are a Student, provided the record is maintained in the normal course of business and is used only in relation to the individual’s employment. 3. Department of Public Safety (DPS) Records: Records maintained by DPS solely for law enforcement purposes, which are revealed only to DPS and other law enforcement agencies, and are maintained separately from other Education Records. 4. Records maintained by USC Student Health, including Counseling and Mental Health Services, and other university departments providing health or counseling services, when the records are used only for treatment of a Student and are made available only to persons providing the treatment. 5. Records which only contain information about an individual after he or she is no longer a Student at the university, such as alumni records. 6. Investigatory and adjudicatory notes, memoranda, letters, and files gathered and prepared by staff in the Office of Community Expectations and the Office of Academic Integrity prior to the final resolution of the Student Disciplinary Process(es) to which they relate under the Student Handbook. 7. Emails sent or received by University Officials about a Student, unless they are added to an official record-keeping system beyond the email platform. 8. Emails or other records contained in a Student’s university email account. 9. Any other record excluded now or in the future in accordance with FERPA.
Student	<p>Solely for purposes of this Policy, a student is defined as any person who has enrolled in a course, seminar, or academic program of the university. A student is considered enrolled after they have formally registered in a course and begun attending class.</p>
University Official	<ol style="list-style-type: none"> 1. A person employed by the university in an administrative, supervisory, academic, research or support staff position. 2. A person elected to the Board of Trustees. 3. A person employed by or under contract to the university to perform a special task (such as an attorney or auditor). 4. A contractor, consultant, volunteer or other outside party providing services that would otherwise be provided by a university employee.

	5. A student serving on an official university committee or assisting a university official in the performance of his or her tasks.
Directory Information (as designated by the university)	A Student's address (local and permanent), telephone number (local and permanent), university email address, student identification photo, student identification number (USC ID), USC attendance dates, USC degrees earned (with dates), academic honors, expected date of graduation, major/minor and degree objective, most recent previous school attended, participation in officially recognized activities and sports, whether or not the student currently is enrolled, and enrollment status (e.g., undergraduate or graduate, full-time or part-time).
Disclosure	To permit access to or the release, transfer, or other communication of PII contained in Education Records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.
Legitimate Educational Interest	A University Official has a Legitimate Educational Interest in an Education Record if they are: <ol style="list-style-type: none"> 1. Performing a task that is specified in their position description or by a contract agreement. 2. Performing a task related to a Student's education. 3. Performing a task related to the discipline of a Student. 4. Providing a service or benefit relating to the Student or Student's family (such as health care, counseling, job placement or financial aid).
Personally Identifiable Information (PII)	<ol style="list-style-type: none"> 1. The Student's name. 2. The name of the Student's parent or other family members. 3. The address of the Student or the Student's family. 4. A personal identifier, such as the Student's social security number, student identification number, or biometric record. 5. Other indirect identifiers, such as the Student's date of birth, place of birth, and mother's maiden name. 6. Other information that, alone or in combination, is linked or linkable to a specific Student that would allow a reasonable person in the university community, who does not have personal knowledge of the relevant circumstances, to identify the Student with reasonable certainty. 7. Any information from a Student's Education Record, even if requested in a seemingly deidentified fashion, if the university reasonably believes that Student's identity is known by the person requesting the information.

5. Policy Details

The Vice President for Culture, Ethics, and Compliance shall maintain in writing policies and procedures for gathering and handling sensitive student information, and appropriate personnel shall receive training regarding those policies and procedures.

A. Annual Notification

Students shall be notified annually of their FERPA rights by publication appearing in the *Student Education Records* section of the [USC Student Handbook](#).

The *Student Education Records* section shall inform Students of the following information:

1. That they have the right to inspect and review their Education Records pursuant to the [Procedure for Reviewing and Inspecting Education Records](#).
2. That they have the right to seek amendment of Education Records that they believe to be inaccurate, misleading, or otherwise in violation of their privacy rights pursuant to the [Procedure for Requesting Amendment of Education Records](#).
3. That Disclosures of PII from their Education Records require their consent, except as set forth in this Student Records Policy.
4. That they have the right to file with the U.S. Department of Education a complaint under 34 CFR 99.63 and 99.64 concerning an alleged failure by the university to comply with FERPA and 34 CFR Part 99.
5. The criteria the university has established under this Policy for determining who constitutes a University Official and what constitutes a Legitimate Educational Interest within the meaning of FERPA.
6. Information regarding Directory Information and the opportunity to opt out of disclosure of Directory Information pursuant to Section 5.F.1 of this Policy.

B. Review and Inspection of Education Records; Copies of Records; Types and Custodians of Records

1. Students shall be permitted to inspect and review their Education Records pursuant to the [Procedure for Reviewing and Inspecting Education Records](#). The Procedure includes a list of the types of Education Records that the university maintains, their official custodians, and contact information for the custodians.
2. Students are only entitled to paper or electronic copies of those records designated by the Office of Academic Records and Registrar, such as academic transcripts, diplomas, and record verification letters. The university reserves the right to charge a reasonable fee for the cost of providing such copies. The Office of Academic Records and Registrar maintains a schedule of fees.
3. The university reserves the right to withhold copies of academic transcripts, diplomas, and other designated records if there is an unresolved disciplinary matter involving the Student or if the veracity of the academic transcript or designated record is in question.

C. Disclosure of Education Records

Covered Personnel shall not disclose PII from Education Records without the written consent of the Student, unless the Disclosure is:

1. To parents or other individuals authorized by the Student to view their Education Records via the Student's *myUSC* account. (Instructions for Students to designate authorized users via *myUSC* are posted on the [website](#) of the Office of Academic Records and Registrar.) Certain offices may require the Student to complete a written consent form in addition to the *myUSC* authorization.

Note: Although a Student may authorize the university to share Education Records with others, the university is not obligated to do so. It is the Student, not their authorized representative, who has a right to review and inspect the Student's Education Records. The university's general expectation is that Students address matters concerning their enrollment with the university directly and on their own behalf.

2. To other Covered Personnel who have a Legitimate Educational Interest in the records.¹
3. In connection with the Student's request for or receipt of financial aid, as necessary to determine eligibility for, amount or conditions of the aid, or to enforce the terms and conditions of the aid.
4. To the apparent creator of the record(s).
5. To officials of another school in which the Student seeks or intends to enroll.
6. To organizations conducting certain studies for or on behalf of the university to develop, validate or administer tests, administer aid programs, or improve instruction, if such studies are conducted in a manner that does not permit personal identification of parents and Students by individuals other than representatives of the organization.
7. To accrediting organizations to carry out their functions.
8. To appropriate parties, including law enforcement officials, in an emergency when the information is necessary to protect the health or safety of the Student or of other individuals. A record is kept of the threat and the parties to whom the information is disclosed.
9. Directory Information, unless restricted by the Student pursuant to Section 5.F.1 of this Policy or by the [Policy on Responding to Immigration Enforcement Actions](#).
10. The final results of a disciplinary proceeding conducted by the university with respect to a crime of violence or a non-forcible sex offense against the alleged perpetrator(s) of that crime to its alleged victim(s). The disclosure shall be made by an authorized official in the Office of Community Expectations (OCE), the Office for Equity, Equal Opportunity, and Title IX (EEO-TIX), or another authorized university office.
11. Made pursuant to the [Policy on Prohibited Discrimination, Harassment, and Retaliation](#) and the [Resolution Process for Sexual Misconduct](#).
12. Made pursuant to the [Procedure for Responding to Government or Other Legal Requests to Access Student Education Records](#).
13. To a court, in connection with a legal action between a Student or their parent(s) and the university. Any disclosures made in connection with this exception shall be made at the direction of OGC.
14. Otherwise authorized under FERPA or other applicable law, as determined by OGC.

¹ If a disagreement arises between Covered Personnel regarding whether one has a Legitimate Educational Interest in Education Records in the custody of the other, the Covered Personnel shall discuss the requested Disclosure with their respective supervisors. If necessary, OGC shall make a final determination.

Disclosures of Education Records pursuant to the foregoing exceptions do not require the applicable Student's consent. However, any Covered Personnel who have custody of or access to Education Records shall only disclose information from Education Records if they are specifically authorized to do so as part of their job responsibilities and pursuant to university standard operating procedures, or if they are directed to do so by an authorized university office.

E. Record of Requests for Disclosure

The university will maintain a Disclosure Record documenting all requests for and disclosures of information from a Student's Education Record subject to the limitation hereinafter provided. The Disclosure Record will indicate the name of the party who made the request, whether the request was approved, the name and address to which Education Record(s) were sent, if any, any additional party to whom the Education Records were authorized to be redisclosed, and the basis on which the Disclosure was made. The Disclosure Record may be reviewed by the Student whose information was requested or disclosed.

The university will not maintain records of requests from and disclosures to the Student or of Disclosures made pursuant to Sections 5.D.1, 2, 4, 9, or 11.

F. Directory Information

1. Students may refuse to permit the university to disclose Directory Information to outside entities without their consent by emailing the Office of Academic Records and Registrar at gtv@usc.edu. Although a Student may submit this request at any time, it will not take effect until it has been submitted and processed. Opting out pursuant to this procedure is the only way a Student may prevent the release of Directory Information. Students wishing only to have their information withheld from the online USC Student Directory should explicitly request this by email at gtv@usc.edu.
2. The university is under no obligation to release Directory Information upon request and considers such information proprietary and not for general release.

G. Amendment of Education Records

Students have the right to request amendment of Education Records that they believe are inaccurate, misleading, or in violation of their privacy rights, subject to certain limitations. Students wishing to exercise this right should refer to the [Procedure for Requesting Amendment of Education Records](#).

6. Procedures

[Procedure for Reviewing and Inspecting Education Records](#)

[Procedure for Requesting Amendment of Education Records](#)

[Procedure for Responding to Government or Other Legal Requests to Access Student Education Records](#)

7. Forms

Click or tap to hyperlink and describe any forms needed to meet the policy's requirements.

8. Responsibilities

Click or tap into the grid to list the units or individuals who are responsible for aspects of the policy and their major responsibilities.

POSITION or OFFICE	RESPONSIBILITIES
Vice President for Enrollment Services	1. Oversee Requests for Amendment of Education Records
Office of Academic Records and Registrar	1. Oversee Requests to Review and Inspect Education Records 2. Process Requests to Restrict Disclosure of Directory Information
Office of the General Counsel	1. Address Government and Other Legal Requests to Access Student Education Records 2. Adjudicate Disputes Among Covered Personnel Regarding Legitimate Educational Interests

9. Related Information

[Policy on Acceptance of Summons, Complaints, and Subpoenas](#)

[University and Health System Protocol When Presented with a Warrant or Government Subpoena](#)

[Policy on Responding to Immigration Enforcement Actions](#)

10. Contacts

Please direct any questions regarding this policy to:

OFFICE	PHONE	EMAIL
Office of the Vice President for Enrollment Management	(213) 740-7849	vpap@usc.edu

11. Policy URL

Click or tap to include links to where the policy is hosted on USC's websites. Include all listed on a school, department, or unit website, the URL to the policy (formatted in PDF) should be provided here.