

COLLEGE OF MEDICINE	
ACCESS TO MEDICAL STUDENT RECORDS POLICY FACULTY AND STAFF	
Approved by Education Program Committee September 6, 2018	

Policy Statement

The University of Cincinnati College of Medicine abides by The **Family Educational Rights and Privacy Act of 1974 (FERPA)**. It is the federal law that governs the release of and access to student education records.

According to FERPA, personally identifiable information in an education record may not be released without prior written consent from the student. Some examples of information that may not be released without prior written consent of the student are:

- Birth date
- Religious affiliation
- Citizenship
- Disciplinary status
- Ethnicity
- Gender
- Grade point average (GPA)
- Marital status
- SSN and student I.D. number
- Grades and exam scores
- Test scores (such as SAT, GRE, etc.)
- Progress reports such as STARS

The university will not release personally identifiable information from a student's education record without the student's prior written consent. Even parents are not permitted access to their son's or daughter's education records unless the student has provided written authorization permitting the parents' access.

One exception, which permits disclosure without consent, is disclosure to school officials with “legitimate educational interest”. A school official is an employee, agent or other person acting on behalf of the University, to include: a person employed by the University in an administrative, supervisory, academic or research, or support staff position; a person or company with whom the University has contracted as its agent to provide a service instead of using University employees or officials (such as an attorney, auditor, collection agent, or enrollment/degree certification service facilitator); a person serving on the Board of Trustees; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official has a legitimate educational interest if the official

needs to review an education record in order to fulfill his or her professional responsibilities for the University.

Procedures

UCCOM Registrar Office is the first point of contact for faculty and staff to request access to medical student records.

MedOneStop Student Record Access Requests

A written request stating what access is needed and why should be submitted to the Registrar. Requests will be reviewed and if approved a MedOneStop Security Application Request form will be submitted by the Registrar to grant access.

Miscellaneous Student Cohort Data Requests

Request for other information about student cohorts from administrative offices, faculty and staff are submitted in writing to, and vetted by, the registrar to ensure FERPA compliance. Requests should include information to address the following:

1. Student record data categories
2. Data security measures
 - a. Who will have access to data
 - b. How will data be stored
 - c. How will data be maintained
 - d. How will data be destroyed

Data Requests for Research Purposes

Request for information about students for the purposes of research are submitted in writing to, and vetted by, the registrar to ensure FERPA compliance. Requests should include information to address the following:

1. Student record data categories
2. Data analysis procedures
3. Data security measures:
 - a. Who will have access to data
 - b. How will data be stored
 - c. How will data be maintained
 - d. How will integrity of de-identified data be maintained in scholarly products
 - e. How will data be destroyed
4. A copy of the IRB proposal
5. Submitted MOS ticket (select the reason for Research Request)

In the event there are questions about legitimate educational interest, consultation may be sought by the University Registrar and the Director of Privacy (Office of General Counsel).

Access to the medical student record is limited and closely monitored by the registrar to ensure confidentiality.

Compliance - FERPA Training

All Faculty and staff, as well as any other agents of the university must have completed the required FERPA training at the time of hire. Access to medical student records will be denied if training has not been completed.

Link to University of Cincinnati Policy

Additional information regarding the University of Cincinnati FERPA and Records Privacy Policy is available at <https://www.uc.edu/about/registrar/faculty-and-staff-resources/staff-resources/ferpa-reference.html>