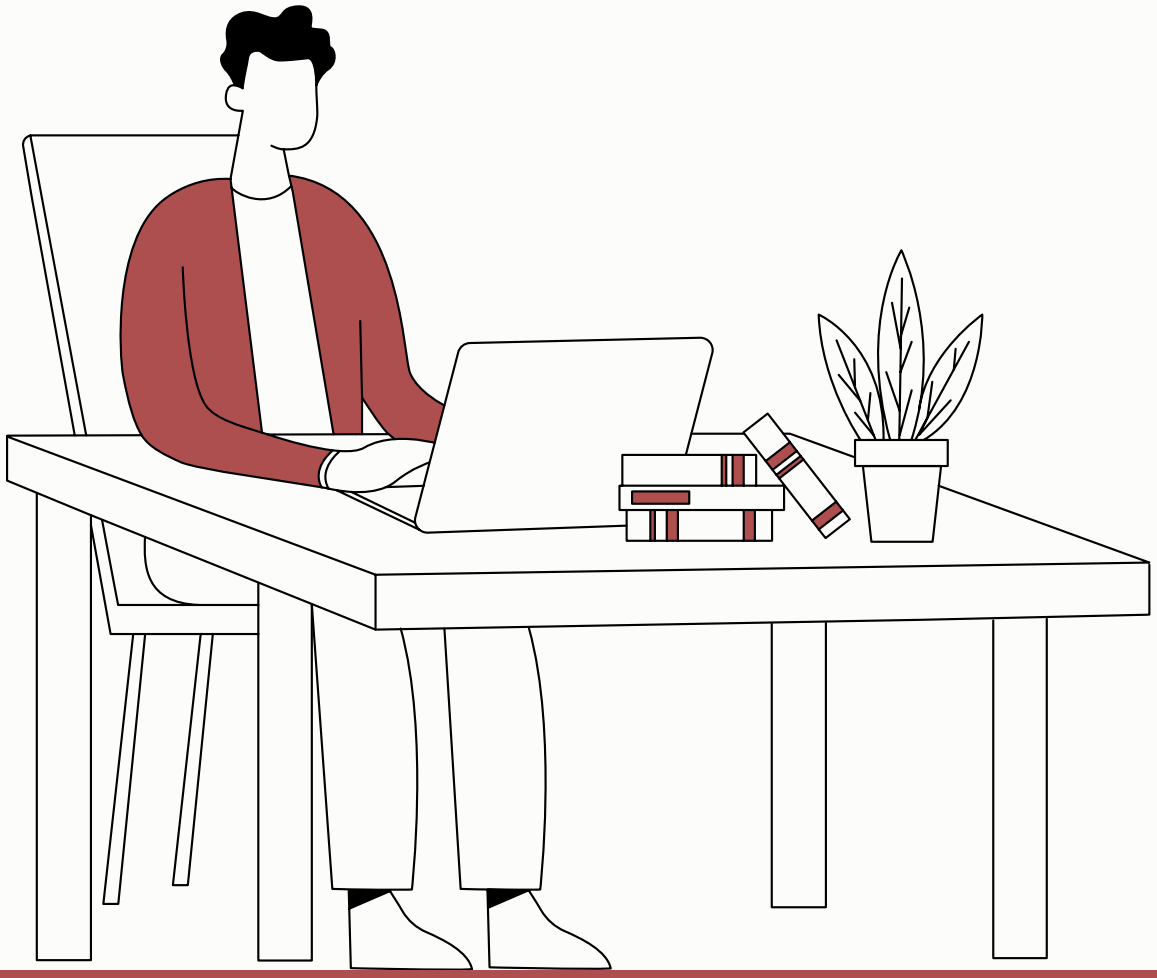
NEW LINES INSTITUTE
MA in Strategy and Policy



Federal Education Rights and Privacy Act (FERPA)

FERPA rights transfer to the student when the student attends a postsecondary institution. Accordingly, references to a 'student' in this section mean a student who holds rights under FERPA. FERPA affords students certain rights with respect to their education records. These rights include the right to inspect and review education records; request amendment of records believed to be inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA; provide consent before certain disclosures of personally identifiable information; and file a complaint with the U.S. Department of Education concerning alleged failures by the Institute to comply with FERPA.

1.1 Right to Inspect and Review Educational Records

A student has the right to inspect and review the student's education records maintained by the Institute, subject to the limitations provided by FERPA. The Institute will provide access within a reasonable period of time, but no later than 45 days after receiving a request.

1.2 Request to Inspect and Educational Record

Eligible students are afforded the right to inspect all education records maintained by the Institute. The following procedures should be followed to allow a student to inspect their record.
(1) Students must provide a written request indicating what type of education records they want to inspect.
(2) Students should submit the written request to the Registrar's Office. The Registrar will oversee the inspection process.
(3) Students will be able to review the requested education records within 45 days of submitting their request.
(4) The Registrar will contact the student to arrange a day and time for the inspection to take place and supervise the inspection.
(5) The student will be able to make notes during the inspection but is not permitted to remove any records or documents at the time of the inspection.
(6) Following the inspection, both Registrar and student will sign a copy of the request to note the date, time and location the inspection took place. A copy should be retained by the Registrar's Office.

1.3 Limitations on the Right to Inspect and Review

Consistent with FERPA, the right to inspect and review education records is subject to certain limitations, including the following:
1. **Parents' Financial Records**. A postsecondary institution is not required to permit a student to inspect or review the financial records of the student's parents, including information contained in those records.
2. **Records Containing Information About Other Students**. If an education record contains information concerning more than one student, the requesting student may inspect and review, or be informed of, only the specific information relating to that student, consistent with FERPA.
3. **Certain Applicant Records.** An individual who applies for admission to the Institute but is not admitted and does not attend the Institute generally does not have FERPA rights with respect to records maintained solely in connection with the individual's application for admission.
4. **Certain Confidential Letters and Statements of Recommendation**. A student does not have a right to inspect certain confidential letters and statements of recommendation where FERPA permits the records to be withheld, including qualifying letters and statements for which the student has validly waived the right of access.
5. **Other Records Excluded or Limited by FERPA**. The right to inspect and review does not extend to records excluded from the definition of education records under FERPA or otherwise not subject to the FERPA right of access.

2.1 Right to Request Amendment of Education Records

A student who believes that information contained in the student's education records is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA may request that the Institute amend the record.

The following procedures apply to a request for amendment:

1) The student must submit a written request that clearly identifies the education record, or portion of the record, the student is requesting to have amended and explains why the student believes the information is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA. A separate request should be submitted for each amendment requested.
2) The written request must be submitted to the Registrar's Office.
3) The Institute will review the request and provide the student with a written decision within **30 calendar days** after receiving the request.
4) If the Institute determines that the requested amendment is warranted, the record will be amended accordingly, and the student will be notified in writing.
5) If the Institute determines that the record should not be amended as requested, the student will be notified in writing of the decision and of the student's right to request a hearing regarding the contested information.
6) A student who wishes to request a hearing must submit a written request to the Registrar's Office. The Institute will hold the hearing within **30 calendar days** after receiving the student's written request for a hearing, unless circumstances beyond the Institute's reasonable control require additional time. The Institute will provide the student with reasonable written notice in advance of the hearing, including the date, time, and place of the hearing.
7) The Institute will provide the student with a written decision within **15 calendar days after the hearing**. The decision will be based solely on the evidence presented at the hearing and will include a summary of the evidence and the reasons for the decision.
8) If, following the hearing, the Institute determines that the information is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA, the Institute will amend the record accordingly and notify the student in writing.
9) If, following the hearing, the Institute determines that the information should not be amended, the Institute will notify the student in writing of the decision and inform the student of the right to place a statement in the education record commenting on the contested information or explaining the student's disagreement with the Institute's decision. The statement will be maintained with the contested portion of the record for as long as the record is maintained and will be disclosed whenever the contested portion is disclosed.

The FERPA amendment process is intended to address information in education records that is inaccurate, misleading, or otherwise in violation of a student's privacy rights. It is not intended to provide a process for challenging substantive academic judgments, such as a grade or other academic evaluation, when the record accurately reflects the decision that was made. Challenges to substantive academic decisions must be pursued through the applicable Institute academic appeal or grievance procedure. Contact the Registrar's Office at registrar@newlinesinstitute.org if you have additional questions.

2.1.1 Hearing Regarding a Request for Amendment

Upon receiving a student's written request for a hearing, the Institute will provide a hearing that satisfies FERPA requirements. The hearing will be held **within 30 calendar days after the Institute receives the student's written request for a hearing**, unless circumstances beyond the Institute's reasonable control

require additional time. The Institute will provide the student with reasonable written notice in advance of the hearing, including the date, time, and place of the hearing.

The hearing will be conducted by an individual who does not have a direct interest in the outcome. The student will have a full and fair opportunity to present evidence relevant to the issues raised and may, at the student's own expense, be assisted or represented by one or more individuals, including an attorney.

The Institute will provide the student with a written decision **within 15 calendar days a**fter the hearing. The decision will be based solely on the evidence presented at the hearing and will include a summary of the evidence and the reasons for the decision.

If the Institute determines that the challenged information is inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA, the Institute will amend the record accordingly and notify the student in writing.

If the Institute determines that the information should not be amended, the Institute will notify the student in writing of the decision and inform the student of the right to place a statement in the education record commenting on the contested information or explaining the student's disagreement with the Institute's decision. The statement will be maintained with the contested portion of the record for as long as the contested portion is maintained and will be disclosed whenever the contested portion is disclosed.

3.1 Consent to Disclosure of Education Records

The Institute generally will not disclose personally identifiable information from a student's education records without the student's prior written consent, except as permitted or required by FERPA or other applicable law.

When consent is required, it must be signed and dated, specify the records that may be disclosed, state the purpose of the disclosure, and identify the party or class of parties to whom disclosure may be made. Students wishing to authorize disclosure to a third party should complete the Institute's Consent to Release Student Information Form and submit it to the Registrar's Office.

3.1.1 Disclosures Without Consent

FERPA permits or requires certain disclosures without prior written consent. Depending on the circumstances and applicable legal requirements, these may include disclosures to School Officials with legitimate educational interests; disclosures relating to certain financial aid; disclosures to authorized representatives for audit or evaluation purposes; disclosures to organizations conducting certain studies for or on behalf of the Institute; disclosures to accrediting organizations; disclosures in connection with a health or safety emergency; disclosures pursuant to certain subpoenas or judicial orders; disclosure of properly designated directory information; and other disclosures permitted or required by FERPA or applicable law.

Questions about whether a disclosure is authorized should be directed to the Registrar's Office before information is released.

3.1.2 School Officials and Legitimate Educational Interests

The Institute may disclose education records without prior written consent to School Officials whom the Institute has determined have a **legitimate educational interest** in the records.

A "**School Official**" may include a person employed by the Institute in an administrative, supervisory, academic, research, support, or other institutional position; a member of the Board of Managers; a student serving in an official institutional capacity; and, when FERPA requirements are satisfied, a contractor, consultant, volunteer, academic partner, or other party to whom the Institute has outsourced an institutional service or function.

An outside party qualifies as a School Official under this exception only when the party performs an institutional service or function for which the Institute would otherwise use employees, is under the Institute's direct control with respect to the use and maintenance of education records, is subject to applicable FERPA restrictions governing use and redisclosure, and meets the criteria stated in the Institute's annual FERPA notification.

A School Official has a "**legitimate educational interest**" when access to an education record is necessary to perform the official's professional responsibilities or an authorized institutional service or function on behalf of the Institute. Status as a School Official does not, by itself, authorize unrestricted access to student education records.

4.1 Directory Information

FERPA permits the Institute to designate certain information as directory information and to disclose such information without prior written consent unless the student has exercised the right to restrict disclosure.

The Institute designates the following as directory information:

- Student name
- Major field of study
- Dates of attendance and date of graduation ("Enrollment Dates")
- Enrollment status
- Class level
- Previous institutions attended
- Degrees and awards received
- Photographs
- Participation in officially recognized activities

4.1.1 Limited Directory Information

The Institute currently designates student ID number and date of birth as limited directory information. Limited directory information is not intended for general public disclosure and may be used or disclosed only for verification and legitimate educational purposes established by the Institute, consistent with FERPA.

A student identifier designated as directory information will not be used in a manner that, by itself, permits access to education records without an additional authentication factor or other information known or possessed only by the authorized user.

The Institute assumes that students who do not request to withhold disclosure of their directory information consent to the release of this information.

4.1.2 Student Right to Restrict Directory Information

A currently enrolled student may request that the Institute not disclose some or all designated directory information by submitting the Institute's Prevent Disclosure of Student Information Form, Directory Information Withhold/Release Form, or successor form to the Registrar's Office.

The request must be submitted within **30 calendar days after the Institute issues its annual FERPA notification**. A directory information restriction remains in effect until the student rescinds the restriction in writing by submitting a written request to the Registrar's Office. The restriction does not expire automatically at the end of an academic term or academic year and does not need to be renewed annually.

A directory information restriction does not prevent the Institute from disclosing information when disclosure is otherwise permitted or required by FERPA or other applicable law.

Students should understand that restricting directory information may limit the Institute's ability to verify enrollment, degree status, graduation, honors or awards, or other directory information to third parties.

Confidential Hold: A student who elects to restrict the disclosure of directory information may request a Confidential Hold in accordance with the procedures established by the Registrar's Office. A Confidential Hold restricts the Institute from disclosing the student's designated directory information to third parties, except when disclosure is permitted or required by FERPA or other applicable law. Students with a Confidential Hold must conduct Institute business requiring identity verification in person with a valid photo identification or through their official Institute email account. The Institute will not release student information by telephone when a Confidential Hold is in effect. The student's name will not appear in any commencement program.

A Confidential Hold does not provide a student with a right to remain anonymous in courses or to restrict routine academic and classroom communications necessary for participation in the student's educational program. Students with a Confidential Hold may be identified by name in their courses, and their official Institute email address may be used for legitimate instructional and educational purposes

The Confidential Hold and associated directory information restriction remain in effect until the student rescinds the restriction in writing by submitting a written request to the Registrar's Office. The restriction does not expire automatically and does not need to be renewed annually.

5.1 Redisclosure and Use of Information

Parties receiving personally identifiable information from education records are subject to FERPA's applicable limitations on use and redisclosure. Information disclosed under a FERPA exception may be used only for the purpose for which the disclosure was made, except as otherwise permitted by FERPA.

6.1 Annual Notification of FERPA Rights

The Institute will notify students annually of their FERPA rights. The annual notice will include the right to inspect and review education records; the right to seek amendment; the right to consent to disclosures except where FERPA authorizes disclosure without consent; the right to file a complaint with the U.S. Department of Education; the procedures for exercising access and amendment rights; and the Institute's criteria for determining who constitutes a School Official and what constitutes a legitimate educational interest.

7.1 Complaints Concerning FERPA

A student who believes that the Institute has failed to comply with FERPA may file a complaint with:

Student Privacy Policy Office (SPPO)
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-8520

Information about filing a FERPA complaint is available from the U.S. Department of Education's Student Privacy Policy Office.

8.1 FERPA Questions and Forms

Questions concerning FERPA, access to education records, requests for amendment, disclosure of student information, directory information restrictions, or related procedures should be directed to the Registrar's Office.

Relevant forms include the **Consent to Release Student Information Form, Prevent Disclosure of Student Information Form, and/or Directory Information Withhold/Release Form**, as applicable. The Institute should ensure that terminology, procedures, deadlines, and effective periods stated on these forms remain consistent with this Catalog and the annual FERPA notice.

Contact Information

For further information about the New Lines Institute Master of Arts in Strategy and Policy, please contact admissions@newlinesinstitute.org.

Location: 1660 L St. NW. ste. 450 Washington, DC 20036, US