FERPA POLICY

Updated October 2026

I. Purpose

Carrington College (sometimes referred to herein as "Carrington," "College" or "School") respects the rights and privacy of its students and acknowledges the responsibility to maintain confidentiality of personally identifiable information. The Family Educational Rights and Privacy Act of 1974 (commonly known as "FERPA") is a federal law that affords students' rights with respect to their education records.

II. Definitions

For purposes of this policy, Carrington College uses the following definitions of terms:

1. "Student" means any person who attends or has attended Carrington College.
2. "Education Records" means any record (in handwriting, print, tapes, film, computer, or other medium) maintained by Carrington College or an agent of Carrington College, which is directly related to a Student, except:
    a. A personal record kept by a staff member if it is kept in the sole possession of the maker of the record and is not accessible or revealed to any other person, except a temporary substitute for the maker of the record.
    b. An employment record of an individual, whose employment is not contingent on the fact that he or she is a Student, provided the record is used only in relation to the individual's employment.
    c. Alumni records, which contain information about a Student after he or she is no longer in attendance at Carrington, and which do not relate to the person as a Student.
3. "Directory Information" means certain Student information designated by the College that the College has the right disclose without having to ask a Student's permission as allowed under FERPA. Carrington College designates the following as Directory Information:
    a. Student's name(s);
    b. Student's identification number assigned by Carrington College;
    c. Student's address(s);
    d. Student's telephone number(s);
    e. Student's email address(s);
    f. Student's campus email address;
    g. Student's photographs;
    h. Student's dates of attendance;
    i. Student's major field of study (program);
    j. Student's nature and dates of certificates and degrees, honors, and awards received;

k. Student's participation in officially recognized activities; and

l. Student's current enrollment status.

4. "Legitimate Educational Interest" is when a Carrington School Official needs to review an Education Record in order to fulfill a professional responsibility for Carrington.

5. "Carrington School Official" a person employed by Carrington in an administrative, supervisory, and academic or research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the Board of Governors; or a Student serving on an official committee, such as disciplinary or grievance committee. Additionally, a Carrington School Official may include a company with whom the Institution is affiliated or a volunteer or contractor outside of Carrington who performs an institutional service of function for which the College would otherwise use its own employees and who is under the direct control of the College with respect to the use and maintenance of personally identifiable information ("PII") from Education Records, suchas an attorney, auditor, collection agent, service provider, clinical or externship site, or a student assisting another Carrington School Official in performing his or her tasks.

III. Annual Notification and Publication

Colleges are required to provide students an annual notification of their rights under FERPA. Currently enrolled Students will be notified of their FERPA rights annually via email to the Students' School email accounts. This policy will be published at least annually on Carrington College's website on the Student Consumer Information page, which may be accessed at: https://carrington.edu/admissions/student-consumer-information/.

IV. Summary of FERPA Rights

FERPA affords Students the following rights with respect to their Education Records:

1. The right to inspect and review one's own education records.

Students have the right to review their Education Records within 45 days of the day that Carrington receives their request. Students should submit written requests to the registrar that identify the record(s) they wish to inspect. Carrington will make arrangements for access and notify the student of the time and place where the records can be inspected. If the person to whom the student submits therequest does not maintain the requested records, that person will either reroute the request or advise the student of the correct Carrington School Official to whom the request should be addressed.

2. The right to seek an amendment of inaccurate or misleading information.

Students may ask Carrington to amend a record they believe is inaccurate or misleading. They should write to the Carrington School Official responsible for the record, clearly identify the part of the record they believe should be changed and specify why it is inaccurate or misleading. If Carrington decides not to amend the record as requested by the Student, the Student will be notified of the decision and advised of his/her right to a hearing regarding the request for amendment. Additional information regarding thehearing

procedures will be provided to the Student when they are notified of the right to a hearing.

Following the hearing, if Carrington still decides not to amend the record, the Student has a right toplace a clarifying statement in the record. Carrington is not required to consider requests for amendment to grades or disciplinary decisions.

3. **The right to limit disclosure of personally identifiable information.**

   Students have the right to limit disclosure of personally identifiable information contained in their Education Records, except to the extent that FERPA authorizes disclosure without consent. For example, exceptions that permit disclosure without a Student's consent are disclosure to Carrington School Officials who have a Legitimate Educational Interest in the Education Records, and the disclosure of Directory Information.

4. **The right to withhold information**.

   Directory Information is not considered to be harmful or an invasion of privacy if disclosed. FERPA generally considers Directory Information to be public information which can be disclosed without a Student's consent. Currently enrolled Students may choose to withhold disclosure of their Directory Information by obtaining and completing the Request to Withhold Directory Information form from their local Registrar's Office and returning it to the same. The School will honor a Student's request to withhold Directory Information; however, the School cannot assume responsibility for subsequently contacting the Student for permission to release Directory Information to prospective employers, relatives, or other persons.

   The failure on the part of any Student to specifically request that his or her Directory Information be withheld indicates individual approval for disclosure. Additionally, the Student's request to withhold Directory Information will not affect previous disclosures made by the School prior to receipt of the request. Once the form is filed, this request becomes a permanent part of the Student's Education Records and no information may be released until the Student instructs the College otherwise.

5. **The right to file a complaint with the U.S. Department of Education**.

   Students have the right to file a complaint with the U.S. Department of Education if an educational institution subject to FERPA fails to comply with FERPA requirements. Complaints should be directed to:

   Family Policy Compliance Office
   U.S. Department of Education
   400 Maryland Avenue, SW
   Washington, DC 20202-4605

V. Exception to FERPA Non-disclosure Provisions

FERPA permits the disclosure of Students' Education Records, without consent of the Student, if the disclosure meets certain conditions found in §99.31 of the FERPA regulations. Except for disclosures to Carrington School Officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of Directory Information, and disclosures to the Student, §99.32 of FERPA regulations requires the institution to record the disclosure. Eligible Students have a right to inspect and review the record of disclosures. A postsecondary institution may disclose PII from the Education Records without obtaining prior written consent of the Student:

- To other school officials, including teachers, within the school whom the school has determined to have Legitimate Educational Interests. This includes contractors, consultants, volunteers, or other parties to whom the school has outsourced institutionalservices or functions, provided that the conditions listed in §99.31(a)(l)(i)(B)(J)- (a)(l)(i)(B)(2) are met. (§99.31(a)(l).)

- To officials of another school where the Student seeks or intends to enroll, or where theStudent is already enrolled if the disclosure is for purposes related to the Student's enrollment or transfer, subject to the requirements of §99.34. (§99.31(a)(2).)

- To authorized representatives of the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, suchas a State postsecondary authority that is responsible for supervising the university's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of Federal or State-supported education programs, or for the enforcement of or compliancewith Federal legal requirements that relate to those programs. These entities may make further disclosures of PII to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§99.3l(a)(3) and 99.35.)

- In connection with financial aid for which the Student has applied or which the Student has received, if the information is necessary to determine eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid. (§99.31(a)(4).)

- To organizations conducting studies for, or on behalf of, the School, in order to: (a) develop, validate, or administer predictive tests; (b) administer student aid programs; or (c) improve instruction. (§99.31(a)(6).)

- To accrediting organizations to carry out their accrediting functions. ((§99.31(a)(7).)

- To parents of an eligible Student if the Student is a dependent for IRS tax purposes.(§99.31(a)(8).)

- To comply with a judicial order or lawfully issued subpoena. (§99.31(a)(9).)

- To appropriate officials in connection with a health or safety emergency, subject to §99.36. (§99.31(a)(10).)

- Information the College has designated as Directory Information under §99.37.(§99.31(a)(ll).)

- To a victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense, subject to the requirements of §99.39. The disclosure may only include the

final results ofthe disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding. (§99.31(a)(13).)

- To the general public, the final results of a disciplinary proceeding, subject to the requirements of §99.39, if the school determines the Student is an alleged perpetrator ofa crime of violence or non-forcible sex offense and the Student has committed a violationof the school's rules or policies with respect to the allegation made against him or her. (§99.3l(a)(l4).)

- To parents of a student regarding the student's violation of any Federal, State, or local law, or of any rule or policy of the school, governing the use or possession of alcohol or acontrolled substance if the school determines the student committed a disciplinary violation and the student is under the age of 21. (§99.3l(a)(15).)

VI. Deceased Students

The privacy rights of an individual expire with the individual's death. Records held by Carrington College for a deceased person are not a FERPA issue but a matter of institutional policy. Carrington College will exercise its own discretion in deciding, if, and under what conditions, information should be disclosed tothird parties or survivors.

VII. Fees for Copies

Carrington College does not currently assess a fee for copies of Education Records requested by a Student, but reserves the right to impose fees upon further notice.

VIII. Types, Locations, and Custodians of Education Records

The following is a list of the types, locations, and custodians of Education Records that Carrington College maintains:

TYPES	LOCATION	CUSTODIAN
Demographics, schedule, grades, contact history, and transcripts	Anthology Student, Canvas	Registrar
Financial Aide Records	Electronic Files -- Anthology Student Physical Files -- Sacramento Campus	Financial Services
Any records signed by the student	Student Records – Anthology Student Financial Aid Records – Anthology Student	Registrar Financial Services
Student records prior to 1990	DocuWare Database	Registrar

IX. Questions

If you have any questions about this policy or your rights under FERPA, please contact your Campus Academic Dean or email studentaffairs@carrington.edu.