

STUDENT DIRECTORY DATA

347.1

In accordance with the District's designation and written notice of student directory data, the District may disclose a student's directory data to any person unless the student's parent or guardian (or adult student, if applicable) has notified the District, in writing, that any or all of the student's directory data shall not be disclosed. If an appropriate party exercises a valid opt out under this policy, then the District shall not disclose the directory data covered by the opt-out decision unless (1) an appropriate party provides advance written consent for the disclosure; or (2) the District determines that there is a separate and otherwise applicable exception to the confidentiality of the records that permits or requires such disclosure.

The District designates the following data elements from student records as "directory data":

- Student's name
- Recorded images of the student that are not being maintained by the District for a separate purpose as a behavioral record
- Student's school/grade level
- Degrees and awards received by the student
- Student's participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- The name of the school most recently previously attended by the student
- Student's dates of attendance (not including daily attendance records)

The District's designation and use of directory data is further defined and limited as follows:

1. Pursuant to a state law requirement, unless the student's parent or guardian (or adult student) has notified the District of his/her objection to such a disclosure of the student's directory data, the District shall, upon request, provide any representative of a law enforcement agency, city attorney, district attorney or corporation counsel, county department under section 46.215, 46.22 or 46.23, a court of record or municipal court with such directory data information relating to any such student enrolled in the school district for the purpose of enforcing that student's school attendance, to respond to a health or safety emergency, or to aid in the investigation of alleged criminal or delinquent activity by a student enrolled in the District.

2. The District discloses a student's date of birth only for the purpose of acknowledging and observing the student's birthday within the student's school. A student's date of birth is never released in response to a third party's request for access to student directory data.
3. Although a student's address and telephone number are not designated as student directory data under this District policy, the District is nonetheless required by law to release a high school student's name, home address, email address, and telephone number to military recruiters and institutions of higher education, upon their request, unless the student or the student's parent or guardian, as applicable, has notified the District that such information shall not be released without prior written consent. The District shall notify adult students and parents and guardians of high school students under the age of 18 of their right to opt out of such disclosures. Requests for student contact information under this paragraph include requests from any technical college district for the contact information of students who may be graduating from high school in the current school year.
4. Pursuant to federal law, the District may not disclose or confirm a student's directory data without obtaining the written consent of a parent or guardian if a student's social security number or other non-directory information is used alone or in combination with other data elements to identify or help identify the student or the student's records.
5. Under federal guidelines (FERPA and COPPA), a district may consent on behalf of parents or guardians for a child to utilize an educational tool that would give a 3rd party application, software or website access to directory information. The district utilizes a variety of online tools to support learning. These applications must demonstrate a clear tie to educational support. Parent or guardian request to opt out of the release of this directory information follows the same opt-out procedure as other directory information.

Directory Data Notice and Opt-Out Decisions

The District will provide written notice of the District's designation of student directory data, opt-out rights, and opt-out procedures to parents/guardians and adult students (if applicable). Notice will be provided via publication in the District Annual Notices and through the District website. A directory data notice

may be combined with, or otherwise referenced within, the District's federally-required annual student records notice.

Upon a student's initial enrollment and registration in the District, upon re-enrollment following a gap in enrollment, and upon each continuing student's initial transition into high school, the student's parent or guardian (or adult student, if applicable) shall be provided with a copy of the District's directory data notice and shall have 14 days to inform the school, in writing, that all or any part of the student's directory data may not be released without prior consent. During such 14-day periods, the District will avoid the release of the student's directory data under this policy.

Regarding decisions to opt out from the school's disclosure of all or any part of the directory data under this policy:

1. Using procedures established by the administration, a parent or guardian (or adult student, if applicable) may make, modify, or withdraw an opt-out decision regarding directory data at any time, but should allow for a reasonable period of time for such a decision to be processed.
2. Unless the District issues express notice to a parent, guardian, or adult student stating that a new opt-out decision is required (in which case a 14-day non-disclosure period will again apply), an opt-out decision from the disclosure of directory data under this policy will remain in effect until it is modified or withdrawn by an appropriate party.

Legal References:

Wisconsin Statutes

- [Section 19.65](#) [rules of conduct; employee training; and security regarding personally-identifiable information]
- [Section 118.125](#) [state student records law; policies required]
- [Section 767.41\(7\)](#) [custody and physical placement; parent access to records]

Federal Laws

- [Family Educational Rights and Privacy Act](#) [federal student records statute]
- [34 C.F.R. Part 99](#) [U.S. Department of Education FERPA regulations]
- [Protection of Pupil Privacy Amendment](#) [federal privacy and parental rights law]
- [20 U.S.C. §7908](#) [military access to student information; see also [10 U.S.C. §503\(c\)](#)]

Adoption Date: 11/15/21

Amended: 03/28/22

