

TO: New Student Records System (SRS) Users

FROM: Margaret Kip  
University Registrar

RE: **SRS SECURITY REQUEST FORM**

Attached is the SRS Security Request Form. You will need to complete this form if you want to view and/or update any SRS screen.

In order to access SRS, you will also need to obtain an ISC user account. The ISC user account request form may be requested from Angela Henry, ISC Security Administrator at 8-5031 and is available online at:

<https://srfs.upenn.edu/sites/default/files/publisher/ISC-Logon-ID-Request-Form.pdf>

For security reasons, users are not permitted to share account logons – you must have an account logon of your own. Violations of this policy may result in the suspension of your access to SRS. Please note SRS maintains an audit trail of all transactions entered into the SRS screens.

After you have filled out your part of the SRS Security Request form and the ISC user account request, forward the forms to the person (Task Force Representative) in your department and/or school responsible for authorizing SRS/ISC accounts. Check with your supervisor if you have questions about this.

The Task Force Representative will designate the screens to which you should have access and the signed forms should be forwarded to Christy Daly, [cadaly@upenn.edu](mailto:cadaly@upenn.edu). After your SRS security access has been implemented, you can view your security status and the screens you have access to on screen 40 and 41. All screens are inaccessible until you complete the prerequisite SRS training.

Security in SRS is based on what you need to know to do your job. If you think you need to view and/or update screens you have not been given access to, talk to your supervisor or Task Force Representative.

# SRS SECURITY REQUEST FORM

Check Type of Request:  New Access Request  Change of Access  Reinstatement

Name: \_\_\_\_\_ ISC Account Number: P \_\_\_\_\_  
 Title: \_\_\_\_\_ PENN ID Number: \_\_\_\_\_  
 Department/School: \_\_\_\_\_ / \_\_\_\_\_  
 Department Address: \_\_\_\_\_  
 Telephone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_ @ \_\_\_\_\_

Please check the screen functions that you need to view and/or update in SRS:

View Only	View & Update	<b>Screen Functions</b>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Course Inventory/Course Term File/Course Register Management</b> <ul style="list-style-type: none"> <li>• Adding or maintaining academic course offerings</li> <li>• Adding or maintaining course descriptions for the Course Register</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Classroom Management</b> <ul style="list-style-type: none"> <li>• Schedule classrooms (access approved by the Registrar's Office ONLY)</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Bio-graphic-Demographic Information</b> <ul style="list-style-type: none"> <li>• Adding and maintaining student's personal information</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Academic Program</b> <ul style="list-style-type: none"> <li>• Matriculating students into academic programs</li> <li>• Changing Majors/Minors</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Grading and Academic Records</b> <ul style="list-style-type: none"> <li>• Viewing grade changes and academic statistics</li> <li>• Posting graduations, maintaining honors and transcript text</li> <li>• Viewing student transcripts</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Registration</b> <ul style="list-style-type: none"> <li>• Entering or viewing advance registration or registration Drop/Add requests</li> <li>• Entering Permits/Authorizations for Students</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Penn Equivalent Credit</b> <ul style="list-style-type: none"> <li>• Entering or maintaining credit by exam, advance placement, internal or external transfer credit</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Advising Subsystem</b> <ul style="list-style-type: none"> <li>• Advising Students including maintaining student correspondence files</li> </ul>
<input type="checkbox"/>	<input type="checkbox"/>	<b>Graduation Audit</b> <ul style="list-style-type: none"> <li>• Clearing Students for graduation</li> </ul>

If you are a School, Division, or Department representative who will need access to records outside of your primary School, Division, or Department, please indicate the area in which you will need access and the reason to access this area.

AREA (Other School, Division, Department)	Screen Function	Reason

Please read the policy on Confidentiality of Student Records carefully and indicate your understanding of the contents by signing in the space provided:

As an individual whose position requires interaction with any or all of the University's administrative information systems, I may be provided with direct access to confidential and valuable data and/or use of data systems. In the interest of maintaining the integrity of these systems and of ensuring the security and proper use of University resources,

- I will maintain the confidentiality of my password for all systems to which I have access.
- I will maintain in strictest confidence the data to which I have access. Confidential information will not be shared in any manner with others who are unauthorized to view such data.
- I will use my access to the University's systems for the sole purpose of conducting official business of the University.
- I understand that the use of these systems and their data for personal purposes is prohibited. This includes but is not limited to the adding or dropping of courses, entering or changing of grades, entering or adjusting of tuition and fees for myself or any others not specified by my department as my responsibility.

I understand that any abuse of access to the University's systems and their data, any illegal use or copying of software, any misuse of the University's equipment may result in disciplinary action, loss of access to the University's systems, and possible sanctions consistent with Adherence to University Policy (<http://www.hr.upenn.edu/policy/policies/001.asp>).

I also have read and understand the policy on Confidentiality of Student Records.

Requestor signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

### SRS Access Authorization

Department/Division Supervisor:

\_\_\_\_\_  
Name Title Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Task Force Representative: [Please check correct security level for requestor:  A  B ]

\_\_\_\_\_  
Name Title Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Office of the University Registrar Approval:

\_\_\_\_\_  
Name Title Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_

# Confidentiality

## Student Records

The following guidelines represent the policy of the University concerning the confidentiality of student records. This policy has been revised to reflect current interpretations of the Family Educational Rights and Privacy Act of 1974, as amended (hereafter referred to as the "Act"). It is intended to serve as the written statement of policy and upon annual publication and dissemination as the notice of rights required by the regulation implementing the Act (45 C.F.R. Sections 99.5 and 99.6). University policy, however, confers greater privacy rights in certain areas than does federal law, and these guidelines contain more than the federally mandated information with respect to such policy.

The following sections set forth specific University policy concerning (A) informing individuals in attendance of their rights under the Act, the implementing regulation, and University guidelines, (B) permitting students to inspect and review their records, (C) not disclosing personally identifiable information from the records of a student or an applicant for admission without his or her prior written consent, (D) maintaining a record of disclosures of personally identifiable information from the records of a student and permitting a student to inspect that record, and (E) providing a student with an opportunity to seek the correction of his or her records through a request to amend his or her records or a hearing.

### I. Informing Individuals in Attendance of Their Rights

It is University policy annually to inform individuals in attendance at the University and their parents of their rights under the Act, the implementing regulation, and University guidelines, and of their right to file complaints concerning alleged failures by the University to comply with the requirements of the Act and of the implementing regulation.

### II. Permitting Students to Inspect and Review Records

#### A. Persons Entitled to Inspect and Review Records

University policy follows the Act in permitting individuals who are or who have ever been in attendance at the University (hereafter referred to as "students") to inspect and review records in certain circumstances.

#### B. Records Subject to Inspection and Review

Records subject to inspection and review are, in general, those that are directly related to a student and that are maintained by the University or a party acting for the University. Such records specifically include the files of an admission office.

#### C. Records and Information Not Subject to Inspection and Review

Records and information that are not subject to inspection and review include, but are not limited to:

1. Records of instructional, supervisory, and administrative personnel and educational personnel and educational personnel ancillary thereto that are in the

sole possession of the maker thereof and are not accessible or revealed to any other individual except a substitute.

2. Records of a law enforcement unit of the University provided that certain conditions imposed by the Act with respect to maintenance disclosure are met.
3. Records relating to a student that are created and maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting or assisting in his or her professional capacity and that are created, maintained, or used only in connection with the provision of treatment to the student and are not disclosed to anyone other than individuals providing that treatment. Such records can be reviewed, however, by a physician or other appropriate professional of the student's choice.
4. Financial records and statements of the parents of students or any information contained therein, except with the written permission of the parent or parents whose records and statements are at issue.
5. Confidential letters and statements of recommendation that were placed in a student's records prior to January 1, 1975, either pursuant to a solicitation containing a written assurance, or with a documented understanding of confidentiality and that are used only for the purpose for which they were specifically intended.
6. Confidential letters and statements of recommendation respecting admission to an educational institution, application for employment, or the receipt of an honor or honorary recognition that were placed in a student's records after January 1, 1975 and as to which the student has executed a written waiver of his or her right to inspect and review; provided that the University uses the letters and statements only for the purpose for which they were originally intended and notifies the student upon request of the names of all individuals providing such letters and statements.
7. Records and information other than the letters and statements referred to in Subparagraph II.C.6 above as to which the student has executed a written waiver of his or her right to inspect and review.
8. Those portions of a student's records that contain information on other students.

#### **D. Waivers**

A student may waive any of his or her rights under the Act and under these guidelines, including the right to inspect and review records. Such a waiver may be made with respect to specified classes of records and persons or institutions, but it must be made in writing and signed by the student.

In no case may a student be required by the University to waive his or her rights under the Act or under these guidelines. A student, however, may find it appropriate to do so for a number of reasons, and when a University service solicits an appraisal on behalf of a student seeking admission to further study or seeking employment, it will notify the individual requested to provide an appraisal whether the student has waived his or her right to inspect and review the appraisal.

#### **E. Procedure with Respect to Inspection and Review of Records**

1. Requests to inspect and review a student's records should be made in writing (whether or not the student personally appears) and addressed to the official responsible for those records.
2. The official responsible for the records in question will determine whether or not the University will honor such a request within a reasonable period of time. In doubtful cases, the request should be referred for decision to the General Counsel.

3. The University will comply with requests to inspect and review a student's records that it has determined to honor within a reasonable period of time but in no case more than forty-five days after the request was made.
4. The University may require the presence of a University official during the inspection and review of a student's records.
5. Copies of those student records that are subject to inspection and review may be obtained, with the exceptions noted hereafter, upon payment of a fee of 25 cents per page, except that the charge for an official transcript is seven dollars (\$7). The University will deny a request for a copy of a student's records in circumstances leading officials to believe that making a copy obtainable to the student would (i) impose a greater financial and administrative burden on the University than would inspection and review of the records themselves, or (ii) undermine substantial institutional interest, including the protection of the privacy of third parties. In addition, the University reserves the right to withhold a copy of a student's grades and transcript until he or she has paid in full all of his or her financial obligations to the University.
6. The University will respond to reasonable requests from students for explanations and interpretations of records inspected and reviewed hereunder.

**F. Types and Locations of Records**

A listing of the types and locations of records (as defined in Subparagraphs II.B. and II.C. stated previously) maintained by the University and the titles and addresses of the officials responsible for those records may be reviewed by a student at the Office of the Registrar, the office of the school or department in which a student is enrolled, and the office of a student's major field of study. In addition, the University Health Service maintains such records, as do placement offices whose services have been used by students.

**G. Retention and Destruction of Records**

The Act does not preclude the destruction of records unless there is an outstanding request to inspect and review them. Attention is directed, however, to guidelines on the retention and destruction of records of undergraduate students, which were promulgated in August 1975.

In addition, there may be other legal and institutional constraints \*; in cases of doubt those responsible for the records in question should contact the General Counsel.

\* For instance, the Pennsylvania Fair Educational Opportunities Act renders it an unfair educational practice for an educational institution to "fail to preserve for a period of three years any records, documents and data dealing with or pertaining to the admission, rejection, expulsion or suspension of students. . ." 24 P.S. 500(a) (5).

**III. Not Disclosing Personally Identifiable Information**

**A. Persons to Whom University Policy Applies**

Except as noted hereafter, the protection against disclosure of personally identifiable information afforded by University policy extends to the records of students (as defined in Subparagraph II.A) and of applicants for admission. To this extent, University policy is broader than required by the Act, which applies only to individuals who are or who have been in attendance at the University.

Neither the Act nor these guidelines apply with respect to the records of deceased persons. The person responsible for such records, however, should exercise informed discretion in responding to requests for disclosures and should ensure that the person

making the request has a legitimate interest in the information and that the privacy interests of third parties are considered.

### **B. Records and Information Protected**

The records to which University policy against disclosures (as set forth hereafter) applies are those defined in Subparagraphs II.B and II.C above, but include as well such records pertaining to applicants for admission. "Personally identifiable information" means that the data or information include (a) the name of the individual, (b) the address of the individual, (c) a personal identifier such as the individual's social security number, or (d) a list of personal characteristics or other information that would make the individual's identity easily traceable.

### **C. Consent Required**

Except as noted in Subparagraphs III.D and III.E, personally identifiable information may not be disclosed from the records of a student or of an applicant for admission without the individual's prior written consent. Such consent shall be signed and dated and include a specification of the records or information to be disclosed, the purpose(s) of the disclosure, and the party or class of parties to whom the disclosures may be made.

### **D. Consent Not Required**

The University generally will not permit disclosure of personally identifiable information from the records of a student (or of an applicant for admission) without prior written consent. Personally identifiable information may, but need not, except in the circumstances described in Subparagraphs II.D and (4) and (6), be disclosed from the records of a student or of an applicant for admission without that individual's prior written consent to the following individuals or institutions, or in the following circumstances:

1. School officials who have been determined by the University to have legitimate educational interests.
  - o a. "School officials" means employees of the University, including faculty, staff, part-time employees, and those performing work for the University under proper authorization.
  - o b. In determining whether a school official has "legitimate educational interests" in personally identifiable information in the records of a student or of an applicant for admission, the University will consider whether the information in question is required or would be helpful to the official in the performance of his or duties for, or in the pursuit of an enterprise sanctioned by, the University.
  - o c. Custodians of information will establish control procedures to ensure that these limitations are observed.
2. Officials of another school in which a student or applicant for admission seeks or intends to enroll.
3. A person who submits a written affirmation that he or she is the parent of a student or applicant for admission and that the student is a dependent within the meaning of Section 152 of the Internal Revenue Code of 1954. In general, the University does not make records available to a student's parents.
4. State and local officials or authorities to whom information is specifically required to be reported or disclosed pursuant to a state statute adopted prior to November 19, 1974.
5. In connection with financial aid for which a student or applicant for admission has applied or which he or she has received, but only for such purposes as

determining eligibility for financial aid, the amount of financial aid, and the conditions that will be imposed, or for enforcing the terms or conditions of financial aid.

6. To comply with a judicial order or lawfully issued subpoena, provided, in the case of a student, that the University makes a reasonable effort to notify him or her in advance of compliance.

If disclosure of personally identifiable information is made hereunder, it shall be limited to that information in which the individual seeking disclosure is determined, by the person responsible for the records, to have a legitimate interest.

In addition, disclosure of personally identifiable information is permitted in certain limited circumstances to federal, state, and local officials and to organizations carrying out studies or accrediting functions. When a request from such an official or organization, or judicial order or subpoena, is received, the recipient should contact the General Counsel.

#### **E. Directory Information**

The University designates as directory information, which may be disclosed from records relating to a student or applicant for admission without his or her consent, a student's or applicant's name, address (local, home or electronic mail), telephone number, date and place of birth, major field of study, participation in officially recognized activities (including social and honorary fraternities) and sports, weight and height if a member of an athletic team, dates of attendance, degrees and awards received, and previous educational institutions attended.

Public notice of these categories and of the right of an individual in attendance to refuse to permit the designation of any or all of them as directory information with respect to him or her will be given annually. Failure to respond to such notice will result in the routine disclosure of one or more of the designated categories of personally identifiable information. The University will continue to exercise informed discretion in responding to requests for information contained in records maintained by it that relate directly to students.

#### **F. Limitation on Redisclosure**

Except for disclosures of directory information, the University will inform a party to whom a disclosure of personally identifiable information from the records of a student is made that disclosure is made only on the condition that the party will not disclose the information to any other party without the student's prior written consent.

### **IV. Maintaining a Record of Disclosures**

Except with respect to disclosures to a student or pursuant to his or her written consent, requests by or disclosures to school officials with legitimate educational interests, and disclosures of directory information, the official responsible for the records of a student (as defined in Subparagraph II.A) will maintain with these records, as part of his or her control procedures, a record that indicates (a) the parties who have requested or obtained personally identifiable information and (b) the legitimate interests these parties had in requesting or obtaining the information, which may be inspected by the student.

### **V. Providing an Opportunity to Seek Correction**

- A. A student (as defined in Subparagraph II.A) who believes that information contained in his or her educational records is inaccurate or misleading or violates his or her privacy or



other rights may request that the University amend them, and the University will decide whether to do so within a reasonable period of time.

B. If the University declines to amend the student's records, it will so inform him or her and inform him or her of his or her right to a hearing.

C. The University will, on written record, provide an opportunity for a hearing in order to challenge the content of a student's records. A hearing, however, may not be requested by a student to contest the assignment of a grade.

D. If as a result of a hearing the University determines that a student's challenge is without merit, the student will have the right, and will be so informed, to place in his or her records a statement setting forth any reasons for disagreeing with the University's decision. Students have a right to file complaints concerning alleged failures by the University to comply with the requirements of the Act and the implementing regulation. Such complaints should be addressed to the Family Educational Rights and Privacy Act Office (FERPA), U.S. Department of Education, 400 Maryland Avenue, S.W., Washington D.C. 20202-4605. Students and applicants for admission are encouraged to bring their complaints regarding the implementation of University policy to the attention of the General Counsel. Copies of these guidelines are available at the Office of the Registrar, 221 Franklin Building.

## **Student Directory Information**

The Student Directory published by the University of Pennsylvania contains the following information for each student: name, local address, local phone, home address, school, expected year of degree, and (if applicable) code name of social fraternity.

Any student can withhold permission for the publication of the telephone number and home, local and electronic mail addresses by checking the appropriate box on the fall term student Personal Data Form and filing that form with the Office of the Registrar by the end of the first week in September.

In addition, each student has the right to withhold permission for any listing at all in the Student Directory. To exercise this right, the student must notify the registrar in writing by the end of July that his or her name is not to be included in the Student Directory. Such letters of notification must include full identification (name, social security number, and school within the University).

## **Parent Notification**

Pennsylvania is a large, diverse, coeducational, urban University community. It offers tremendous freedom to the individual and expects that each member of the University community will carry his or her share of its responsibilities. The University does not take on a parental role in relation to its students but rather assumes that students can live as young adults who can make their own decisions and take basic responsibility for their own lives. Thus, most communication from the University is directed to the student; only in cases of extreme emergency are parents or guardians notified about a student's activities. The University has adopted the following policy regarding notification:

- A. In cases of injury and in emergency situations, the University will notify the individual(s) designated by the student.
- B. In an emergency situation in which rape has been committed, the victim will be asked whether notification of others should occur. All rape cases are handled according to special procedures developed by the Department of Public Safety, described in their "Safer Living" guide distributed to all students.
- C. In other than emergency situations, a decision to notify the parents will be made by the Office of the Vice Provost for University Life, or another senior student affairs officer, after consultation with the student's school office, if appropriate. Other offices, such as Counseling and Psychological Services, also may be consulted as appropriate. Examples of other than emergency situations would include medical leaves of absence, emotional difficulties, and missing persons.