



**Policy Title:** Confidentiality of Student Records

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**Accountable Dean(s) or Director(s):**

Associate Dean for Admissions and Student Affairs  
Associate Dean for Medical Education and Academic Affairs  
Director, Office of Medical Education

**Approval Body:**

Office of Admissions and Student Affairs

**RELEVANT LCME STANDARD:**

11.5 Confidentiality of Student Educational Records

**POLICY STATEMENT AND PURPOSE:**

The LCME states: At a medical school, medical student educational records are confidential and available only to those members of the faculty and administration with a need to know, unless released by the student or as otherwise governed by laws concerning confidentiality.

**DEFINITIONS**

For the purposes of this policy, the following terms and definitions apply:

- **Family Educational Rights and Privacy Act (FERPA):** Federal law designed to protect the privacy of student education records.
- **Legitimate educational interest:** According to FERPA, a legitimate educational interest refers to a school official's need to review an educational record in order to fulfill their professional responsibilities.
- **Educational record:** As defined under FERPA, education records are records that are directly related to a student; are maintained, in whatever format or medium, by an educational institution or by a party acting for the institution; and contain information that is personally identifiable to a student. Examples include grades, transcripts, academic evaluations, test scores and other academic records; general counseling and advising records; disciplinary records; and financial aid records.

**POLICY GUIDELINES:**

Tulane University SOM protects the confidentiality of student educational records in accordance with FERPA guidelines and ensures access is only available to those with a legitimate educational interest based on job requirements and responsibilities. This policy outlines which individuals are permitted access to medical student educational records, the procedure by which access is granted, and the mechanisms in place to ensure security.

**Access Requests**

**A. Directory Information**

In accordance with FERPA, Tulane SOM reserves the right to release 'Directory Information' upon request. Students may withhold or restrict the release of this information by opting out through the Gibson Online student portal. Directory Information includes but is not limited to:

- Student's legal name
- Student's preferred name
- Dates of admittance and attendance
- Major, minor, or other area of specialization
- Full or part time enrollment status
- Student classification (year in program)
- Date(s) and type(s) of degree(s) and honor(s) awarded

**B. Those with Legitimate Educational Interest**

Tulane SOM recognizes the following individuals as having legitimate educational interest, granting them the ability to review or access a student's educational record.

- Administrators, including deans, registrars, and administrative staff involved in student affairs, admissions, office of medical education, or academic records.
- Course/clerkship directors, academic advisors, and faculty members involved in assigning grades.
- Students serving on an official SOM committee, such as the Professionalism & Promotions Committee, who may review and discuss student educational records as part of their committee responsibilities.

**C. Other Requests**

- Medical school administrators and faculty members without a pre-determined legitimate educational interest based on their role must request access to a student's education record through the Registrar or the Director of the Office of Medical Education. Access will only be granted with the student's written consent.
- Outside Entities/Third Parties
  - FERPA guidelines allow for the release of educational records to outside entities/third parties in limited instances. These instances do not require student consent prior to the release of the record(s) and may include:
    - Educational institutions where the student may be enrolled or may be seeking enrollment.
    - Specific local, state, or federal government officials for audit purposes.
    - Accreditation agencies and/or regulatory bodies.
    - Appropriate parties/entities in connection with financial aid for the student.
    - Individuals or entities as required to comply with a judicial order or lawfully issued subpoena.
    - Appropriate parties as necessary in connection with a health or safety emergency.
  - The Registrar and/or Director of the Office of Medical Education ensures all requests by outside entities and third parties are permissible before any records are released.

**System Security**

Educational records are stored in electronic systems with role-based and individual access controls. These controls are reviewed and approved by a designated authority, such as the Registrar or Director of the Office of Medical Education. When a user with individual access transfers to another position or leaves the SOM, their access is promptly modified or revoked.

**LAST REVIEW DATE/APPROVAL:**

Office of Admissions and Student Affairs: 04/15/25

**REVIEW CYCLE:**

Every 3 years