

STUDENT DIRECTORY DATA

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:

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.

DATE OF BIRTH DISCLOSURE

The District discloses a student's date of birth in grades K-12 and 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.

MILITARY DISCLOSURE

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, primary 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.

SOCIAL SECURITY DISCLOSURE

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.

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).

At a minimum, 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.

ADOPTED: April 27, 2020

REVISED:

CROSS REFS.: Policy JO, Student Records
Policy JB, Equal Educational Opportunities

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\(c\)](#)]

REVIEW DATE: April 27, 2020

STUDENT DIRECTORY DATA OPT-OUT FORM

OPT-OUT FROM STUDENT DIRECTORY DATA AND DISCLOSURES OF STUDENT CONTACT INFORMATION

(Completing this form is optional. If completed, however, a new form must be submitted annually to be in effect.)

The District has designated the following student information as “directory data” in order to facilitate each student’s full participation in a variety of school-related activities and publications (such as school yearbooks, acknowledging student awards/achievements, and creating programs for graduation ceremonies, athletic contests, and music/fine arts productions):

- name
- school/grade level
- student’s primary address and phone number
- participation in officially recognized activities and sports
- weight and height of members of athletic teams
- degrees and awards received by the student
- recorded images of the student (when not separately maintained as behavioral records)
- dates of attendance (not including daily attendance records)
- The name of the school most recently previously attended by the student

When information is designated as directory data, it means that the School District may generally disclose the information without obtaining advance consent, provided that the disclosure is consistent with applicable District policy and with the District’s directory data notice. Please be aware that student directory data may sometimes be disclosed to third parties who are not affiliated with the School District. However, parents and guardians (and students over age 18) have the right to notify the District, in writing, that any or all of a student’s directory data may not be disclosed without advance consent.

Similarly, although a student’s telephone number and primary address are not designated as student directory data in this District, **the District is required by law to release a high school student’s name, primary 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 opted out of such disclosures.

When a parent, guardian, or adult student wishes to opt-out of District disclosures of (1) student directory data; and/or (2) student contact information to military recruiters and institutions of higher education, they should fill out the reverse side of this OPTIONAL form and return the signed form to the main office of the school in which the student is currently enrolled.

A parent or guardian (or adult student, if applicable) may use this form to make, modify, or withdraw opt-out decisions at any time, but should allow a reasonable period of time for such decisions to be processed. Unless the District provides written notice to the contrary, an opt-out decision made using this form will remain in effect until it is modified or withdrawn by an appropriate party.

A link to the District’s current directory data notice is included in all student handbooks and can also be obtained from any school office or from the District’s website.

STUDENT DIRECTORY DATA OPT-OUT FORM

OPT-OUT FROM STUDENT DIRECTORY DATA AND DISCLOSURES OF STUDENT CONTACT INFORMATION

(Completing this form is optional. If completed, however, a new form must be submitted annually to be in effect.)

Before completing this form, please review the reverse side of this page and take note of the following:

- Opting out of the School District's disclosure of directory data for certain uses that are in direct connection to school-sponsored activities and school-sponsored publications/communications may affect a student's ability to participate in some school functions and activities.
- Opting out of the disclosure of directory data and contact information using this form does not prevent the School District from disclosing student records without consent (including records that contain directory data) if the District determines that there is a separate exception to the confidentiality of the records that authorizes the disclosure.
- A decision to opt out of the School District's disclosure of a student's name as directory data cannot be used to prevent the school from using, or requiring the student to use, the student's name (or any equivalent identifier permitted by the school) in the student's curricular activities (e.g., classes).

STUDENT NAME: _____

SCHOOL: _____ CURRENT GRADE: _____

NAME OF PERSON FILLING OUT THIS FORM: _____ DATE: _____

RELATIONSHIP TO STUDENT: parent guardian adult student (18 or over)

I wish to withdraw all opt-out elections currently on file for the student identified above.

To "opt-out" of (i.e., block) the School District's disclosure of any or all of the following student information in the absence of actual consent, please place a checkmark or "X" in the appropriate box(es):

This election applies only to high school students. The school district may not disclose the above-identified student's name, address, or telephone number to:

Military recruiters AND/OR Institutions of higher education

I am opting out of the District's disclosure of "directory data" in response to any request submitted to the District by an outside third party, unless the requestor is a District-related organization (e.g., a parent-school or booster group) or a District-selected provider of school-based products/services for students (e.g., a school photographer or a vendor of school-branded clothing).

I am opting out of the District's disclosure of "directory data" in response to a request submitted by a District-related organization or a District-selected provider of school-based commercial products/services for students.

To the extent possible, I am opting out of all disclosures of student directory data and student contact information, whether for a school-related activity or purpose or not. **CAUTION!** This selection can affect the ability of this student to fully participate and be fully included in a variety of school activities and publications (including yearbooks, athletics, and various student recognition activities).

If the above options do not meet your needs, please describe your opt-out request here: _____

(Submission of this form replaces any previous opt-out elections on file for the student.)