



Institute for International Medicine
FERPA/Confidentiality of Student Education Records Policy and Process

I. Right to Records Inspection

A student has a right to inspect and review any education record permitted under this policy. Education records are maintained in several INMED offices. Requests to review records must be submitted through Populi (My Profile > Student) who shall comply with a request within 30 days upon receipt. When a record contains personally identifiable information about more than one student, a student may inspect only that information which relates to the student.

A. Unofficial Transcript Request

1. Students who do not have access to the Internet or who need information or additional services regarding an online request may call INMED at 816-444-6400.
2. There is no fee for unofficial transcript requests.
3. Unofficial transcripts will be sent to the email address provided on the request form.
4. A limit of three (3) transcripts may be requested at one time.
5. The institute does not provide transcripts to any current or former student who has an outstanding financial balance owed to INMED.

B. Official Transcript Request

1. If student does not have access to the Internet or for additional services regarding an online request, they may call INMED at 816-444-6400.
2. Official transcript fee is \$10 (USD) per transcription request.
3. Official transcripts will be sent by mail to the institutions or entities provided on the transcript request online form.
4. A limit of three (3) transcripts may be requested at one time.
5. INMED does not provide transcripts to any current or former student who has an outstanding financial balance owed to INMED.

II. Right to Refuse Records Inspection

The institute reserves the right to refuse to permit a student to inspect the following records:



- A. Financial records of the student's parents or financial support
- B. Confidential letters and statements of recommendation for which the student has waived the right of inspection and review
 - 1. Records connected with an application to attend the university or a component unit of the university if that application was denied
 - 2. Records received from other universities or institutions
 - 3. Those records which are excluded from the FERPA definition of education records

III. Right to Consent to Disclosure of Personally Identifiable Information

The institute will not release personally identifiable information in education records or allow access to those records except to the extent that FERPA authorizes disclosure without consent, including but not limited to the following:

- A. The individual student
- B. Whomever the student authorizes by providing the institution with a written release (release must be written, signed and dated, and must specify the records to be disclosed and the identity of the recipient)
- C. INMED officials who have a legitimate educational interest
- D. Officials of other schools in which a student seeks or intends to enroll or is enrolled
- E. Parents if parents claim the student as a dependent for tax purposes. The university will exercise this option only on the condition that evidence of such dependency is furnished to the Office of the Registrar and all requests for disclosures are referred to that office
- F. Persons in connection with a health or safety emergency
- G. Persons responsible for investigating incidents related to a disciplinary proceeding
- H. A judicial order or lawfully issued subpoena
- I. As otherwise provided in 20 U.S.C. 1232g(b) and 34 CFR Sec. 99.31

IV. Right to Request an Amendment to Educational Records

A student who believes that information contained in the student's education record is inaccurate, misleading or violates privacy or other rights may request that the records be amended through an appeal submission. The responsible official shall then decide whether or not to amend the record. If the record is not amended, the student will be advised of the right to a hearing.

V. Challenge Hearing Procedures



In most cases, the decision of the responsible official will be final. However, a student may elect to file an appeal in the [Appeal Request Online Form](#) (Populi Dashboard > Forms) to the Office of the Registrar in order to challenge the content of the educational record. (The right to challenge grades does not apply unless the grade assigned was inaccurately recorded, under which condition the record will be corrected.)

- A. An impartial hearing officer will be appointed who shall afford the student full opportunity to present evidence in support of the challenge.
- B. The hearing shall be held within a reasonable period of time, not to exceed thirty (30) days under normal circumstances, after the institution has received the request, and the student shall be given notice of the date, place and time reasonably in advance of the hearing.
- C. The student shall be afforded a full and fair opportunity to present evidence relevant to the issues and may be assisted or represented by individuals of the student's choosing at the student's expense, including an attorney.
- D. The hearing officer shall render a decision within a reasonable time after the hearing, not to exceed thirty (30) days, and inform the student in writing of the outcome.
- E. The decision shall be based solely upon the evidence presented at the hearing and shall include a summary of the evidence and the reasons for the decision.
- F. If the hearing officer decides that the record is not inaccurate, misleading or otherwise in violation of the privacy or other rights of the student, the student shall then have the right to place in the education record a statement commenting upon the information in the education record and/or setting forth any reasons for disagreeing with the decision of the hearing official. Any such written explanation then becomes a part of the education record.
- G. If the education records of the student or the contested portion thereof are disclosed to any party, the explanation shall also be disclosed to that party.

VI. Right to File a Complaint

Students have the right to file a complaint with the U.S. Department of Education if they believe that the institute has failed to comply with the requirements of FERPA. The complaint should be in writing and sent to: Family Policy Compliance



Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-8520.

VII. Additional Right to Limit Disclosure of Directory Information

In addition to the four primary rights described above, currently enrolled students have the right to suppress disclosure of their directory information. Directory information may be available through the following:

- A. INMED Directory - A request to exclude information from the online directory found in Populi may be completed by currently enrolled students.
- B. INMED Graduates Pages - Graduates or Alumni may request to exclude information from the INMED website by submitting a FERPA Hold Request through the [Questions & Concerns Online Form](#) (Populi Dashboard > Forms) to the Office of the Registrar. This hold will remain applicable until the student submits an online request specifying otherwise. The INMED Graduates Pages may include the student's name, professional classification, and program.
- C. Course Roster - Currently enrolled students may request to exclude information from the Course Roster by submitting a FERPA Hold Request through the [Questions & Concerns Online Form](#) (Populi Dashboard > Forms) to the Office of the Registrar. This hold will remain applicable until the student submits an online request specifying otherwise. The Course Roster may include the student's name, email, professional classification, and program.
- D. Sunshine Law Requests - In accordance with the Missouri Sunshine Law, the university is required to release student directory information. To be excluded from all Sunshine Law requests, students must submit a FERPA Hold Request through the [Questions & Concerns Online Form](#) (Populi Dashboard > Forms) by the end of the second week of the term. This hold does not apply retroactively to previous releases of directory information and will remain applicable until the student submits an online request specifying otherwise.
- E. General requests for student addresses will be fulfilled by providing one address for each student based on availability according to the following hierarchy: (1) current mailing and (2) primary/permanent. General requests for student telephone numbers will be generated in similar fashion.

VIII. Definitions



A student - an individual with respect to whom the institute maintains education records or personally identifiable information and who is or who has attended the institute. A student does not include a person who has not been in attendance.

In attendance - a student is officially registered for at least one class and that class has started.

Education records - records which contain information directly related to a student and which are maintained by the university or by a person acting for the university. In accordance with FERPA guidelines, the following are *not* education records: law enforcement records, student employment records, medical records, and alumni records. The regulations also exclude from the definition of education records any record that is in the sole possession of the maker of the record where the record is used only as a personal memory aid for the maker and the record is not accessible or revealed to any other person (except a temporary substitute for the maker of the record).

Legitimate educational interest - the need to review an education record in order for a university official to: perform an administrative task outlined in the official's duties; perform a supervisory or instructional task directly related to the student's education; or perform service or benefit for the student such as health care, job placement or financial aid.

A university official - a person employed by the university in an administrative, supervisory, academic, research or support staff position (including law enforcement unit personnel and health staff). Also considered university officials are members of the Board of Governors, a person or company with whom the university has contracted (such as an attorney, auditor or collection agent), temporary employees, student workers, and graduate assistants employed by the university.

INMED Directory - located on the Populi learning management system. The following categories of information have been designated as directory information at INMED:

- A. Name (current, former, and preferred)
- B. Address (current and primary/permanent)
- C. Telephone number
- D. Email address
- E. Field of study, including certifications, diplomas, and master's degree
- F. Classification (e.g., MD)
- G. Enrollment status (e.g., full-time, part-time or less than part-time)



- H. Dates of attendance, including matriculation, drop and withdrawal
- I. Degrees and certificates applied for and/or received including award
- J. Previous education institutions attended

INMED Graduates Pages – each INMED program and Alumni page showcases graduates of their program. The following categories of information have been designated as directory information at INMED:

- A. Name (current, former, and preferred)
- B. Classification (e.g., MD)
- C. INMED Program
- D. Service-Learning Site and Year
- E. Scholarly Project if MIH student

Course Roster – a roster that is found in the online course setting with their classmates' information to continue fostering relationships. The following categories of information have been designated as directory information at INMED:

- A. Name (current, former, and preferred)
- B. Email Address
- C. INMED Program
- D. Classification (e.g., MD)

Contact information provided exclusively for purposes of the emergency notification system is not considered directory information.

IX. Deceased Student Records

FERPA rights cease upon death; however, with the approval of the Office of the Registrar, educational records may be released to the student's family or others with a demonstrated legitimate interest. Documentation may be required.

X. For Additional Information

If you have any questions regarding this policy or if you feel that your rights under FERPA are being violated, please contact the Office of the Registrar at registrar@inmed.us or call 816-444-6400;2.