

CENTURY COMMUNITY CHARTER SCHOOL
901 S. Maple Street – Inglewood, CA 90301
(310) 412-2286



Model Policies for Collecting and Retaining Student Information at Century Community Charter School

- ➤ The Principal shall maintain in writing Century Community Charter School's policies and procedures for gathering and handling sensitive student information, and appropriate personnel shall receive training regarding those policies and procedures.
- ➤ If the Century Community Charter School (CCCS) possesses information that could indicate immigration status, citizenship status, or national origin information, CCCS shall not use the acquired information to discriminate against any students or families or bar children from enrolling in or attending school.
- ➤ If parents or guardians choose not to provide information that could indicate their or their children's immigration status, citizenship status, or national origin information, CCCS shall not use such actions as a basis to discriminate against any students or families or bar children from enrolling or attending school.
- ➤ CCCS shall not allow school resources or data to be used to create a registry based on race, gender, sexual orientation, religion, ethnicity, or national origin.
- **Model Policies for Inquiries Regarding Immigration Status, Citizenship Status, and National Origin Information**
 - ➤ CCCS personnel shall not inquire specifically about a student's citizenship or immigration status or the citizenship or immigration status of a student's parents or guardians; nor shall personnel seek or require, to the exclusion of other permissible documentation or information, documentation or information that may indicate a student's immigration status, such as a green card, voter registration, a passport, or citizenship papers.
 - ➤ Where any law contemplates submission of national origin related information to satisfy the requirements of a special program, [local educational agency] personnel shall solicit that documentation or information separately from the school enrollment process.
 - ➤ Where permitted by law, the Office Manager of the CCCS shall enumerate alternative means to establish residency, age, or other eligibility criteria for enrollment or programs, and those alternative means shall include among them documentation or information that are available to persons regardless of immigration status, citizenship status, or national origin, and that do not reveal information related to citizenship or immigration status.

Model Policies for Inquiries Regarding Immigration Status, Citizenship Status, and National Origin Information (continued)

► Where residency, age, and other eligibility criteria for purposes of enrollment or any program may be established by alternative documents or information permitted by law or this [resolution/policy], CCCS procedures and forms shall describe to the applicant, and accommodate, all alternatives specified in law and all alternatives authorized under this [resolution/policy].

Model Policies for Inquiries About Social Security Numbers or Cards

- ► CCCS shall not solicit or collect entire Social Security numbers or cards.
- ► CCCS shall solicit and collect the last four digits of an adult household member's Social Security number only if required to establish eligibility for federal benefit programs.
- ► When collecting the last four digits of an adult household member's Social Security number to establish eligibility for a federal benefit program, CCCS shall explain the limited purpose for which this information is collected, and clarify that a failure to provide this information will not bar the student from enrolling in or attending the school.
- ► CCCS shall treat all students equitably in the receipt of all school services, including, but, not limited to, the gathering of student and family information for the free and reduced lunch program, transportation and educational instruction.

Model Policies and Procedures Regarding Information Sharing

- ► CCCS shall avoid the disclosure of information that might indicate a student's or family's citizenship or immigration status if the disclosure is not authorized by Family Educational Rights and Privacy Act (FERPA).
- ► CCCS personnel shall take the following action steps upon receiving an information request related to a student's or family's immigration or citizenship status:
 - ✓ Notify a designated [local educational agency] official about the information request.
 - ✓ Provide students and families with appropriate notice and a description of the immigration officer's request.
 - ✓ Document any verbal or written request for information by immigration authorities.
 - ✓ Unless prohibited, provide students and parents/guardians with any documents issued by the immigration-enforcement officer

- ► Except for investigations of child abuse, child neglect, or child dependency, or when the subpoena served on the local educational agency prohibits disclosure, the LEA shall provide parental or guardian notification of any court orders, warrants, or subpoenas before responding to such requests.
- The LEA shall require written parental or guardian consent for release of student information, unless the information is relevant for a legitimate educational interest or includes directory information only. Neither exception permits disclosing information to immigration authorities for immigration-enforcement purposes; no student information shall be disclosed to immigration authorities for immigration-enforcement purposes without a court order or judicial subpoena.

Model Policies and Procedures Regarding Information Sharing (continued)

- ► CCCS request for written or parental or guardian consent for release of student information must include the following information: (1) the signature and date of the parent, guardian, or eligible student providing consent; (2) a description of the records to be disclosed; (3) the reason for release of information; (4) the parties or class of parties receiving the information; and (5) if requested by the parents, guardians or eligible student, a copy of the records to be released. The [local educational agency] shall permanently keep the consent notice with the record.
- ► The parent, guardian, or eligible student is not required to sign the consent form. If the parent, guardian or eligible student refuses to provide written consent for the release of student information that this not otherwise subject to release, CCCS shall not release the information.
- **Model Policies for Annual Information Notice to Parents and Guardians**

General Information Policy

- CCCS must provide an annual notice to parents and guardians of the school's general information policies that includes:
 - ✓ Assurances that CCCS will not release information to third parties for immigration-enforcement purposes, except as required by law or court order.
 - ✓ A description of the types of student records maintained by CCCS
 - ✓ A list of the circumstances or conditions under which CCCS might release student information to outside people or entities.
- ✓ A statement that, unless CCCS is providing information for a legitimate educational purpose under FERPA and the California Education Code or directory information, the CCCS shall notify parents or guardians and eligible students—and receive their written consent—before it releases a student's personally identifiable information.

Model Policies for Annual Information Notice to Parents and Guardians (continued)

► If CCCS decides to release directory information, CCCS shall provide an annual notice to parents and guardians, and “eligible students” in attendance, of CCCS directory information policy that includes:

✓ The categories of information that CCCS has classified as public directory information that may be disclosed without parental consent and which should only include the information specifically identified in Education Code section 49061, subdivision (c).

- ✓ A statement that directory information does not include citizenship status, immigration status, place of birth, or any other information indicating national origin (except where CCCS receives consent as required under state law).
- ✓ The recipients of the directory information.
- ✓ A description of the parent’s or guardian’s abilities to refuse release of the student’s directory information, and how to refuse release.
- ✓ The deadline in which the parent, guardian or student must notify the school in writing that he or she does not want the information designated as directory information.