



Operating Protocol & Procedure

Details:

Number: 307

Title: Verification of Identity for Student Services Transactions

Category: Student

Office of Primary Responsibility: Admissions and Records/Registrar

Approval Date: 5/7/18

Effective Date: 5/7/18

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Purpose:

To ensure compliance with the Family Education Rights and Privacy Act (FERPA) requirement that a student's personally identifiable information (PII) is neither disclosed nor discussed without the student first providing secure and verifiable proof of identity.

Applicability:

All staff and faculty

Definitions:

Directory information: Information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Directory information may be released by an educational institution without prior written consent of the student.

FERPA: The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

Personally identifiable information (PII): Data or information that, alone or in combination, is linked or linkable to a specific student and that would allow a person who does not have personal knowledge of the relevant circumstances to identify the student with plausible certainty.

Secure and verifiable proof of identity: A form of identification issued by a state or federal jurisdiction or recognized by the United States government and verifiable by federal or state law enforcement, intelligence, or homeland security agencies.

References:

[CDHE Data Privacy and Security Regulations](#)

Attachments or Related Forms/Documents:

None

Operating Protocol:

In order to comply with CFR Title 34, Part 99, Subpart D of the Family Educational Rights and Privacy Act, Pueblo Community College (PCC) requires that staff, faculty, instructors, and student employees will neither release nor discuss a student's personally identifiable information (PII) with the student in person, over the telephone, through email, or on any video conference system, such as WebEx or any other similar video platform or using any online communication tools such as chat functions or instant messaging software, unless the student has provided reasonable proof of identity beforehand. For each student service transaction, students are required to verify his or her identification before any action is taken.

This includes, but is not limited to, the following types of student transactions:

1. Financial Aid inquiries
2. Registration transactions;
3. Transcript requests and releases;
4. Cashier transactions;
5. Testing services;
6. Release of any part of the student record as defined by FERPA; and
7. Issuance of a College identification card.

Student transactions also include communication in-person or by telephone or email regarding student conduct or discipline matters, grades, and complaints.

Pueblo Community College (PCC) may release the following directory information about students to the public:

- Student Name
- Major field of study
- Dates of attendance
- Degrees and awards received
- Enrollment status (full time, part time, etc.)
- Most recent educational institution attended
- Participation in officially recognized activities and sports
- Height and weight (only for students in officially recognized activities and sports)

For in-person student services transactions requiring verification of identity, a student can verify his or her identification by providing one of the following:

1. Answers to a series of questions unique to that particular student;
2. A College identification card;
3. A high school identification card; or

4. Some other form of valid identification that is considered a “secure and verifiable document” (issued by a state or federal jurisdiction or recognized by the United States government and verifiable by federal or state law enforcement, intelligence, or homeland security agencies).

Examples of “secure and verifiable documents” include, but are not limited to:

1. Colorado driver’s license;
2. Colorado identification card;
3. U.S. Passport;
4. Out-of-state driver’s license;
5. Foreign passport with photo;
6. Military ID/Common Access Card;
7. Certificate of Naturalization with photo;
8. Certificate of Citizenship with photo;
9. I-551 or EAH/Temporary Resident;
10. Refugee/Asylee I-94 with photo; or
11. VA Card with photo.

In instances when a student has signed a FERPA release form authorizing a third party to obtain information regarding the student, the third party will be required make the request in person or, if unable to appear in person, through WebEx (camera must be on) and provide photo identification.

Students needing to take quizzes and/or tests in the College testing center will need to provide photo identification as stipulated by the College’s testing center.

Per SP 4-60, college identification cards will only be issued in person at the student’s home College and only after the student presents a copy of his/her current schedule and a form of valid identification that fits the definition of “secure and verifiable document” as shown above.

While students may choose to forward student email accounts to other email addresses, PCC personnel will not communicate directly to non-student accounts. In order to verify the identity of students for transactions via email, all official College communications are to be sent to students’ college-issued email accounts. The single sign-in feature of PCC’s myPCC Portal, through which student email is accessed, requires that a student input both the Student ID and a self-created password. A free-form text security question, set up by the student upon first entry into the Portal, is available should the student forget his or her password. In addition, four items of PII are required if the student attempts to retrieve his or her Username (student identification number). Faculty and instructors may also communicate with students through their D2L email account.

PCC limits the types of student services transactions that may be conducted over the telephone. Registration activities (including drops and withdrawals) and address changes will not be accomplished based on telephone conversations and release of student identification numbers is not permitted. If contacted by students over the phone regarding FERPA-protected information, staff and instructors should direct them to their college-issued or D2L student email account if the student is unable to appear on campus in person; however, limited transactions, such as inquiries regarding the student’s balance due, tuition appeal, residency, or missing financial aid documents, may be conducted if the student is able to provide answers to select questions based

in data in the Banner student information system. For consistent usage across PCC offices, identity questions are:

- a. What is your name and S number?
- b. What is the street number of the address we have on file for you?
- c. What is the month and day of your birth?

If necessary, a fourth question can be included (“What is one class you are enrolled in this term?” or alternatively, “What was the last term you were enrolled at PCC?” if the student is not currently enrolled).

Procedure:

In-person transactions

For student transactions conducted in-person, as described above, PCC employees must request that the student provide any one of the following:

1. Answers to a series of questions unique to that particular student;
2. College identification card;
3. High school identification card; or
4. Some other form of valid identification that is considered a “secure and verifiable document” (issued by a state or federal jurisdiction or recognized by the United States government and verifiable by federal or state law enforcement, intelligence, or homeland security agencies).

E-mail transactions

PCC personnel will only send email to students using their college-issued email addresses and will not communicate directly to non-student email accounts regarding any FERPA-protected information.

If contacted by students through email sent from a personal account regarding FERPA-protected information, employees should direct them to request the information in-person or to submit their request using their college-issued or D2L student email account.

Telephone and video conferencing transactions

For the limited student transactions that may be conducted over the phone and by video conferencing, PCC employees will ask the student to provide the answer to the following questions:

- a. What is your name and S number?
- b. What is the street number of the address we have on file for you?
- c. What is the month and day of your birth?

If necessary, a fourth question can be included (“What is one class you are enrolled in this term?” or alternatively, “What was the last term you were enrolled at PCC?” if the student is not currently enrolled).

If contacted by students over the phone regarding FERPA-protected information, employees should direct them to request the information in-person or to submit their request using their college-issued or D2L student email account.