AGENDA ITEM ____

Review of Board Policy No. 4800 (Student Education Records and Privacy), Board Policy No. 4810 (US Veterans Educational Benefits–School Compliance Policy), Board Policy No. 4004 (Open Admission for Non-Credit Courses), and Board Policy No. 4709 (Financial Aid Verification Policy).

RECOMMENDED DIRECTIVE

The Board of Regents hereby approves Board Policy No. 4800 (Student Education Records and Privacy), Board Policy No. 4810 (US Veterans Educational Benefits–School Compliance Policy), and Board Policy No. 4004 (Open Admission for Non-Credit Courses), with amendments, and approves the new Board Policy No. 4709 (Financial Aid Verification Policy), for the purpose of updating and strengthening the policy framework to ensure clarity, consistency, and alignment with federal requirements and institutional practices.

DISCUSSION

Policies and procedures are *living frameworks* that balance stability with adaptability. While their core principles provide continuity, their specifics must evolve to reflect the institution's growth and changing needs. As such, the Vice President for Enrollment Management and Student Services (EMSS) continues to collaborate and/or work with relevant EMSS offices and standing committees at the college to review policies and procedures relating to enrollment management and student services (Chapter 4).

This review follows the Board of Regents 2022–2027 Master Planning Calendar, which schedules the review of Board policies by chapter at the Board's regular meetings. Following the calendar keeps the review orderly and predictable, ensures that each policy is brought to the Board on a regular cycle (at least every three years), and gives the Board and the committees time to review proposed amendments before action. Board Policy No. 4709, as a new policy, is not on the calendar and is presented now to address the federal requirement for written verification policies.

On November 2, 2026, the Executive Committee (EC) endorsed these policies after they had been reviewed and endorsed by the relevant standing committees (Recruitment, Admissions and Retention Committee, Student Success Committee, Curriculum Committee, and Finance Committee) in accordance with the College's BP No. 1600 (Governance Structure) and BP No. 2200 (Participatory Governance Policy).

The policies are now presented to the Board of Regents for consideration and approval.

POLICY	REMARKS
BP No. 4800 (Student Education Records and Privacy)	○ The current policy is a one-page statement on *record keeping, student access, confidentiality,* and *parental access.* The amendment expands it into a **complete Family Educational Rights and Privacy Act (FERPA) compliance policy** (14 sections) and retitles it to include "Privacy." ○ Adds a *purpose and scope*, and *definitions* (education records, personally identifiable information, school official, legitimate educational interest, and directory information). ○ Sets out *student rights:* (a) inspect records (response within 45 days); (b) request amendment with hearing; (c) consent to disclosure;

(d) opt out of directory information; (e) file complaint with US Department of Education; and (f) receive an annual notice.

- Designates *directory information* and the opt-out procedure; Social Security numbers are never directory information; addresses military recruiter access (Under 20 U.S. Code § 7908 and the Elementary and Secondary Education Act (ESEA), public high schools and local educational agencies (LEAs) that receive federal funding must give military recruiters access to student contact and directory information.
- List when records may be disclused with and without consent, including health and safety emergencies, subpoenas, financial aid, and parents of dependent students.
- Add an *information security program* consistent with GLBA (see BP No. 8930-Gramm-Leach-Bliley Act Compliance Policy) Safeguard Rules, FERPA training for employees, incident response, a retention and disposal requirement, heightened confidentiality for special categories of records, and sanction for misuse.
- Retains the existing principles that *students control disclosure and may not challenge correctly recorded grades*; grade conserns are referred to BP No. 4903 (Srudent Complaint Policy) and BP No. 4502 (Final Grade Report).
- Requires Board review at least every three years.

BP No. 4810 (US Veterans Educational Benefits-School Compliance Policy)

- Updates the *references*, and adds definitions of *"covered individuals," "certificate of eligibility,"* and *"Secretary."*
- Extends coverage from VA Chapters 31 (Veteran Readiness and Employment (VR&E, which helps service members and veterans with service-connected disabilities prepare for, find, and keep suitable) and 33 (Post 9/11 GI-Bill, which helps eligible veterans, active-duty service members, and qualified family members pay for college, graduate school, trade schools, and job training) to also include Chapter 35 (also known as known as the Survivors' and Dependents' Educational Assistance (DEA) program, which provides financial help for school or job training to the spouses and dependent children of veterans or service members) and Chapter 1606 (Montgomery GI Bill-Selected Reserve).
- Retains the right to attend from submission of the certificate of eligibility until the ealier of VA payment or 90 days safter tuition and fees are certified.
- Clarifies that *no penalties applies*, adding that the college will not deny enrollment or registration or place a hold on records solely because of delayed VA payment (see 38 USC 3679(e)).
- Adds student responsibilities (certificate of eligibility by the first day of the course, written request to use the entitlement, additional information for certification), a provision on payment shortfalls, and a requirement to notify the student in writing of any remaining balance before the protection period ends.

- Assigns administration to the VA School Certifying Official (SCO), requires publicaiton in the catalog and website, and sets review at least every three years and whenever 38 USC 3679 is amended.

BP No. 4004 (Open Admissions for Non-Credit Courses)

- The current policy is a brief statement that the state campuses administer non-credit courses, that the courses are open to the general public, and how they are publicized. The amendment restructures the policy into a full policy (12 sections).
- Adds a *purpose and a definition* of non-credit courses. Courses are open to the public without meeting credit admission requirements or taking the placement assessment. Enrollment is subject to published capacity limits and to any minimum age or prerequisite skills justified by the course content, safety, or law. Registration priorities and restrictions must be announced in advance and applied consistently.
- Retains campus administration, now under the general direction of the Vice President for Instructional Affairs; updates public information to include the College website and social media, requires accurate announcements, and local-language and accessible formats where practical.
- Expands public information. Announcements must be accurate and state the course title, dates, delivery mode, location, fees, prerequisites, restrictions, registration process, credential criteria, and non-credit status. Cancellation and refund terms must be available before registration. Information is provided in English and local languages, and in accessible formats where practical.
- Adds provisions on minors (written parent or guardian consent), nondiscrimination and accommodations, and fees (non-credit courses are not eligible for federal student financial aid or VA educational benefits). It also adds records and privacy (FERPA and BP No. 4800), conduct and complaints (BP Nos. 4905, 4906, 4907, 4909, 4914, and 4903), and the relationship to credit programs (no admission, no automatic credit, no transcript entry, and auditing under BP No. 4406).
- Sets review at least every three years.

BP No. 4709 (Financial Aid Verification Policy) — *new*	○ New policy establishing that the Financial Aid Office verifies student-reported FAFSA information in accordance with the Higher Education Act, 34 CFR Part 668, Subpart E, and the Federal Student Aid Handbook. ○ Rationale — Federal regulations (34 CFR 668.51–668.61) require institutions to verify selected applicants and to follow written verification procedures. A Board-approved policy documents the College's commitment and consistent practice across campuses, supporting Title IV compliance. ○ Applies to all Title IV applicants at the National Campus and CTEC, Chuuk, Kosrae, and Yap campuses. ○ Requires verification of applicants selected by the U.S. Department of Education's FAFSA Processing System and of applicants selected by the College under its own criteria. ○ Requires verification before Title IV disbursement (Pell, FSEOG, Federal Work-Study), except where federal regulations allow interim disbursement or exclusion. ○ Directs the Financial Aid Office to maintain written administrative procedures (AP No. 4709).

ACTION TAKEN

___ Approved as presented

___ Approved with modifications

___ Disapproved

___ Deferred to a later meeting

VOTE

____ Aye ____ Nay ____ Abstain

Date _____