

Moodle for the Graduate Theological Union

The GTU consortial Moodle service, administrated by the Online Learning Coordinator, does not allow access to users who are not directly members of the GTU community including faculty, staff, and students of the GTU and/or one of its member schools. Therefore, requests for access by one of the member schools for any member that is not directly affiliated with the GTU, but is associated only secondarily will not be granted access. This rule applies to any universities, schools, assessment or accreditation teams that might be higher or appointed to oversee or assess a member school, but to which the enrolled students within a Moodle course site have no direct relation. The purpose of this policy is to protect those students who do not have the opportunity to waive their right to privacy according to the FERPA regulations listed above through their own school of registration when said school is not the institution requesting access.

Current FERPA regulations state:

Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

- *School officials with legitimate educational interest;*
- *Other schools to which a student is transferring;*
- *Specified officials for audit or evaluation purposes;*
- *Appropriate parties in connection with financial aid to a student;*
- *Organizations conducting certain studies for or on behalf of the school;*
- *Accrediting organizations;*
- *To comply with a judicial order or lawfully issued subpoena;*
- *Appropriate officials in cases of health and safety emergencies; and*
- *State and local authorities, within a juvenile justice system, pursuant to specific State law*

Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook, or newspaper article) is left to the discretion of each school.¹

Any school who wishes to request access is free to email the OLC at moodle@gtu.edu so long as they can meet either of the following exemptions:

- 1) Moodle sites that contain no student information **are exempt**. This will include sites prior to student enrollment, sites that have all student information removed (such as imported sites), or sites that will never contain student information. External participants not directly related to the GTU **must** be removed from the class **prior** to any student enrollments.
- 2) When a GTU member school has a course site containing student-specific information but all of the enrolled students are **ONLY registered students of the requesting institution** with whom the external institution is involved are exempt from this rule.

¹ <http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>