



## Definition and Purpose of Contact Notes:

Contact notes documenting advising services are a core element in providing excellent service to students. These notes should be descriptive but concise in nature, serving several purposes including:

- Building a network of continuous support for students, the information in the notes provides a map of student progress for advisers and other University staff who may work with the student. It also allows for a holistic approach to individual progress as students move between advisers majors, departments, colleges and other service offices.
- Documenting student interactions including in-person meetings, phone conversations, email messages, or other electronic mediums.
- Giving advisers context and history that allows them to focus on key issues for students rather than repeating or revisiting the same information each visit.
- Providing a map of students' individual curricular development and learning. This may take on additional importance where colleges, programs or majors have specific benchmarks, progression standards or prerequisites to meet. Contact notes can also be valuable in noting or documenting patterns in individual student behavior.
- Being a depository of documented official decisions.
- Providing historical information on student progress and official communication for advisers or administrators. This can include federal or state data reporting, or the review of an individual student question or issue.

## Definition of student record according to FERPA:

Advising notes are governed by the applicable Family Educational Rights and Privacy Act (FERPA) regulations. These guidelines do not address treatment records governed by HIPAA.

FERPA is a federal law designed to protect the privacy of education records; to establish the right of students to inspect and review their education records; and to provide guidelines for the correction of inaccurate and misleading data through informal and formal hearings. You have access to student educational data in order to perform your job duties and have a legal responsibility to protect student education records in your possession. What this means is that, in general, you may not release information from the student record to a third party, including parents, without written permission from the student.

Legally all information we maintain about a student that contains personally identifiable information (e.g., name, id, SSN) is considered part of the educational record. One exemption to this is 'sole possession notes' where the note is maintained by the creator of the note and only accessible to that person – the intent of this portion of FERPA was to allow for 'memory jogger' type notes, not as a way to generally maintain notes on students. All information, whether part of the educational record or 'sole possession notes' are subject to subpoena and must legally be released.



You can access additional information about FERPA through UNL Student Legal Services at:

<http://www.unl.edu/asun/sls/handbook/right.shtml>

or access the Board of Regents policies, section RP-5.10 at

<http://nebraska.edu/docs/board/RegentPolicies.pdf>

### How does this affect me?

You have access to information needed to do your job. You should not access student information that is outside your role or responsibilities. If you receive a request to share individual student information or lists of student information from individuals outside the university or from within the university who do not have an educational need to know the information, you first must check if the information is directory information, and if the student has chosen to suppress any public information. If the information is deemed directory information and the student has not chosen to suppress public information you may release the information. If the request is not non-directory information it may only be released if the student has provided a signed written consent for release. The following is an example of a consent form which allows disclosure of non-directory information:

<http://cas.unl.edu/adminresources/cdmailing/01-31-08/FERPAConsentForm.pdf>

### Guidelines and considerations in creating and managing contact notes:

- Keep current on updating student file contact notes - letting time pass can mean a loss of important details.
- Narrative notes are helpful and readable, but concise, bulleted statements/summaries are also very effective, and often make it easier to scan the notes in preparing for an appointment.
- Please remember to insert a 'subject' in the template in Starfish. This makes it easier to sort or search through notes as files grow for a student.
- The content of advising or other student service unit contact notes will be different, but the concerns and the standards for privacy, sharing and confidentiality are the same. Stay current on, and abide by FERPA. Take a regular refresher course or participate in sessions that might focus on any changes about these standards.
- Consult with supervisors and colleagues when there is a question about what information to include in a contact note or summary.
- In email and personal communication with colleagues regarding students use the same standards as for contact notes. Editorial comments should be offered only during in-person communication.
- Keeping personal notes outside of the Starfish system or other college data/notes systems does not mean they are private. Personal notes are not immune from subpoena or review for grievance or student request.
  - They must be kept separate from regular student files (hard copy and electronic).
  - They must never be shared with others.
  - They should be kept in a very secure place.
  - They should be properly destroyed when no longer needed.



- The standard for the content private notes should be the same as ‘public’ notes. They should be limited only to information that you don’t think should be shared with others.
- Colleges are encouraged to inform students that as a network of continuous support, advisers and other staff keep contact notes, and those notes move with them if they change advisers or majors.

### Content and information to include in contact notes:

Notes should include:

- Summaries of advising and career counseling contacts relevant to student progress toward degree/career.
- Information that will aid you and colleagues in helping the student on their degree or career path. Degree routes may also include significant detours like a medical leave of absence, military service, transfer or even suspension. Good notes help support the transitions of leaving and returning.
- Information that will help colleagues understand the student’s situation as well as advice given.
- A focus on facts and events. Use descriptive comments to summarize conversations and interactions.
- A list of recommended courses, along with alternatives. Frequently, as with general education, this list could be a list of categories where many courses could satisfy the requirement. Include recommendations of very specific courses to take (i.e. approving taking a course out of sequence).
- Describe when and why exceptions have been made, or note if a form documenting/approving such exceptions has been filed.
- Any discussion in which a student chooses either to adopt or reject a recommendation you have made along with possible consequences for students of not following advice given.
- Referrals to campus or community offices or services or names of staff should be as complete as possible so others can interpret who/what was shared.
- Action items requested/required of the student and the follow-up timeline.
- Notes that will facilitate a personal relationship with the student, or help with reference letters or scholarship applications. This might include personal interests, hobbies, travel, etc.
- Notes or emails to and from third parties if they have a bearing on career or degree progress.
  - This could include parents, faculty or colleagues where referrals have been made or questions were directed for help or clarification.
  - Information about those contacts can be shared with the student if they seem relevant, but career counselors and advisers are not obligated to notify the student that information has been added to the file regarding those transactions.
- When professional judgment suggests that you provide an analysis of a situation that goes beyond simply reporting facts and details, comments should be well grounded in fact and reflection. Focus on observation and reaction rather than accusation. For example, “The student spoke in an angry tone that made me very uncomfortable” vs. “She was a bully and rude in the meeting.”
- In evaluating whether to keep email messages in the notes, the same threshold of value or significance should be used for email as it is for regular notes. If it has a bearing on the students’ progress toward career or degree, it should be kept.



### Recording sensitive information:

- When recording information about referrals or conversations of a sensitive or very personal nature, care should be exercised with the language used. Listing the office involved (e.g. CAPS, Career Services, SSD, etc.) can be used as cue concerning the issues. Keep the record fact-based, and if in doubt, have a discussion with the student about what she or he is comfortable having recorded.
- When the student discloses specific information regarding disabilities or health related matters focus on necessary steps that need to be taken to accommodate the situation. Do not diagnose but report the facts: “Student reported that she has SAD and has a hard time getting up in the winter. We talked about this and encouraged her not to take early morning classes in the spring semester.”
- In particularly sensitive situations, you can opt to paraphrase or leave details out that you think should not be included. In such cases, not everything is disclosed, but it would be valuable to note that something was disclosed and actions taken (i.e. need for extended testing time).
- If you choose to offer the option to the student about including a statement, and the student declared that they wanted information included, you can state "student wants it noted that..."
- Information regarding charges or interaction with the Dean of Students that are reported to the college or program from individuals or offices other than the student, should be part of the students advising file only if they relate to advising services.
- If the student self-reports having a case being considered by the Dean of Students, you can report the comments, but limit information to the impact on progress toward degree.
- Student comments regarding instructors should be carefully evaluated to determine if they merit being included in the notes. If comments have a strong tie to progress they can be included. This could also be an area where patterns are observed from semester to semester.
- Student reports of specific faculty behaviors or classroom incidents that border on harassment or discrimination should be shared with supervisors or leaders. Such notes should not include names or any identifiers. A student feeling harassed could be reported something like "student disclosed something about instructor, and consulted with supervisor."

Office of Academic Affairs  
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