

## Veteran Benefits Records

### Access

1. Veteran Benefits records are accessible by
  - a. Director of Financial Aid
  - b. Assistant Director of Financial Aid/VA Certifying Official
  - c. Financial Aid Specialist/VA
  - d. Financial Aid Specialist
  - e. Administrative Support (Part-time)
  - f. Other college officials with “need to know” rationale
  - g. Individual students to their own record based on FERPA guidelines by appointment with the Assistant Director of Financial Aid/VA Certifying Official
    - (1) Right to Inspect and Review. A student has the right to inspect, review, or be informed of his/her financial aid records (but only with respect to information about that particular student), except that the following materials shall not be available:
2. Veteran Benefits records for years prior to and including 2008-09 and forward are maintained in a fire resistant, combination-lock secured vault.
3. Veteran Benefits records may be removed from the vault during normal operating hours (M-Th 8 to 7 and F 8-4).
4. A student who wishes to access his/her Veteran Benefits record must submit a request in writing to the Assistant Director of Financial Aid/VA Certifying Official and will be given access within a reasonable period of time not to exceed 45 days after receipt of the request. The Assistant Director/VA Certifying Official will respond to reasonable requests by a student for explanations and interpretations of his/her Veteran Benefits records. If circumstances effectively prevent a student from exercising the right to inspect and review his/her Veteran Benefit records, the FA/VA Office will provide the student with a copy of the records requested or make other arrangements for the student to inspect and review the requested records.

### Collection

1. Veteran Benefits records, in general, are composed of the following
  - a. VA Application for Benefits (Form 221990 or Form 225490)
  - b. Copy of DD214
  - c. NOBE (Notice of Basic Eligibility)

- d. Change of Status Form (221999B)
  - e. Copy of VA Once Certification
  - f. HCC transcript
  - g. Satisfactory Academic Progress (Probation or Suspension) if applicable
  - h. Visiting Student correspondence
  - i. Other correspondence
2. The components are collected from the student during the veteran benefits application and approval process.

## **Distribution**

1. Veteran Benefits records are not distributed beyond the Financial Aid/Veterans Affairs Office.
2. Information from Veteran Benefits records may be disbursed (released) as follows
  - a. Release without Consent. No release of personally identifiable information shall be made by the Financial Aid/Veterans Affairs Office without a student's prior consent, unless:
    - (1) The disclosure is to other school officials, including instructors, within HCC who have been determined to have legitimate educational interests. Criteria to be considered by HCC include
      - a. Whether the person requesting the information is a current employee of HCC;
      - b. Whether the person requesting the information is in a policy administration or enforcement role such as President of HCC.
      - c. Whether the person requesting the information either is or has been (i) an instructor of the student, (ii) responsible for evaluating the student's performance in an HCC course, (iii) responsible for assessing the student's eligibility for an award, scholarship, or other type of recognition, (iv) responsible for administering all or part of an HCC course or program in which the student intends to participate, has participated or is participating, (v) responsible for counseling the student or determining or reviewing disciplinary action against the student; and,
      - d. Whether the information requested will be used by the person requesting the information in the performance of his/her job duties.
    - (2) The disclosure is to officials of other schools, school systems or institutions of postsecondary education where the student intends to enroll. In the case of Veteran Benefits records, this disclosure of information involves a Visiting Student form between colleges related to students taking classes at more than one college at one time.
    - (3) The disclosure is made in connection with an audit or evaluation of federal or state supported education programs, or for the enforcement of or compliance with federal legal requirements relating to those programs,

to the Comptroller General of the United States, the Secretary of Education, or state and local educational authorities, provided that the information is protected in a manner that does not permit personal identification of individuals by anyone other than the official to whom it is disclosed and is destroyed when no longer needed for the purposes for which it was disclosed (unless the student has consented to the disclosure or the collection of the information disclosed is specifically authorized by federal law).

- (4) The disclosure is made in connection with the student's application for or receipt of veteran benefits and the information disclosed is necessary for such purposes as to determine eligibility for the funding, determine the amount of the funding, determine the conditions of the funding, or enforce the terms and conditions of the funding.
- (5) The disclosure is to state and local officials to whom the information is specifically allowed to be reported related to the juvenile justice system and pursuant to state statutes adopted before and after November 19, 1974.
- (6) The disclosure is to an organization conducting a study for, or on behalf of, educational agencies or institutions to develop, validate or administer ...student aid programs ..., provided that the study is conducted in a manner that does not permit personal identification of students by individuals other than representatives of the organization, and the information is destroyed when no longer needed for the purposes for which the study was conducted.
- (7) The disclosure is to accrediting organizations in order to carry out their accrediting functions.
- (8) The disclosure is to the parents of a dependent student, as defined in Section 152 of Internal Revenue Code of 1954;
- (9) The disclosure is in compliance with a judicial order or pursuant to any lawfully issued subpoena.
- (10) The disclosure is of information that HCC has designated as directory information. A student has the right to refuse to let the College designate any or all of the types of directory information listed in this Policy as being directory information for that student. To do this, the student must notify HCC by providing a written statement of the Assistant Director of Financial Aid/VA Certifying Official within 10 days of the beginning of the applicable semester, listing those types of information about the student that he/she does not want to have designated as directory information. HCC may disclose directory information about former students without notifying them as to the types of information that have been designated by HCC as directory information and without providing them with an opportunity to refuse.
- (11) The disclosure is to the student.
- (12) The disclosure is to an alleged victim of a crime of violence as defined in section 16 of title 18 of the United States Code

- (13) The disclosure is to any other person, entity, or organization authorized to receive personally identifiable information pursuant to FERPA, the regulations implementing FERPA, or other applicable law or regulation.
- b. Personally identifiable information may be released without a student's prior consent to appropriate persons in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other persons. Specific factors should be taken into account in determining this disclosure and these factors are listed elsewhere in this document.
  - c. A student may provide written consent for the release of his/her veteran benefits records. This request must be signed and dated by the student and delivered to the Assistant Director of Financial Aid/VA Certifying Official. Upon receipt of this request, the personally identifiable information contained in the student's veteran benefits record will be provided that information. The student's written consent must include (1) the specific portion of the record that may be disclosed; (2) the purpose of the disclosure; (3) the name of the party or class of parties to whom such records may be disclosed.

Notice must be given to such third parties that the information is not to be disseminated to others without further consent of the student. In the event a student wants a copy of the records released, such a copy will be provided on request and in compliance with copy requirements.

### **Processing**

1. Information in veteran benefits records is processed in the FA/VA Office at HCC.
2. The process consists of the following
  - a. Student completes appropriate application form(s)
  - b. Student provides copies of NOBE or DD214
  - c. Student applies to HCC and is fully accepted into degree-seeking program
  - d. Transcript run if student desiring transfer credit
  - e. Student registers for classes
  - f. VA Certifying Official certifies enrollment via VA Once

### **Protection**

1. All HCC Veteran Benefits records prior to and including 2008-09 and forward are in hard copy file folders with labels showing student name, VA file number and Chapter.

2. No hard copy file folders with VA records are left in individual offices unattended.
3. All HCC VA records prior to and including 2008-09 and forward are kept in a fire-resistant, combination-lock protected vault located in Student Development Services. These records are accessible to authorized personnel only.
4. Students inquiring about or applying for veteran benefits are counseled in private offices.
5. All documents related to VA records are shredded before discarding.
6. Financial Aid/VA Certifying staff have access to specific Datatel nemonics which allows processing of veteran benefits records. This access is password protected and permitted through written authorization from the staff supervisor(s).
7. The VA Certifying Official has access to the VA Once Certification website which is password protected.

### **Storage**

1. All Veteran Benefit records prior to and including 2008-09 and forward are stored in a fire-resistant, combination-lock vault located in Student Development Services.

### **Usage**

1. Veteran Benefit records are used for the express purpose of determining and processing veteran benefits to HCC students.
2. Any other use of VA records is unauthorized and forbidden.

### **Transmittal**

1. Veteran Benefits records information with social security numbers and birth dates may be distributed via email or posted on networks by using the last four digits of the social security number (VA file number) or HCC colleague identification number.
2. Veteran Benefits records require use of students' social security numbers in the submission of the information to the Veterans Administration via VA Once. A veteran's military identification number is the same as his/her social security number.
4. Visiting Student agreements occur between colleges when veterans who are attending and receiving benefits at one school are also attending another college at the same time. Because a student may receive veterans benefits at only school at a time, the purpose of the Visiting Student agreement between participating colleges is to combine the credit hours being taken at the non-veterans benefits certifying school with the hours being taken at the certifying school for the purpose of paying the student for the total number of hours he/she is taking in any given semester. This agreement requires documentation of course registration. The agreement is initiated by the degree-granting veterans benefit certifying school (home) in a letter to the VA Certifying Official at the non-degree granting, non-veteran benefit certifying school. .

## **Disposal**

1. All hard copies of veteran benefits records are shredded based on federal guidelines for records maintenance.
2. HCC's risk assessment (and in particular, the Veterans Affairs Office) is addressed in the HCC Business Continuity Plan referenced elsewhere in this policy.