

NUMBERED MEMO CC25-071

TO: Members of the State Board of Community Colleges, Chairs of the Community College Boards of Trustees, Community College Presidents, Chief Academic Officers, Chief Admissions Officers, Basic Skills Directors, Business Officers, Continuing Education Officers, Customized Training Directors, Chief Financial Officers, Distance Learning, Financial Aid Officers, Personnel Officers, Student Development Administrators, Public Information Officers, Registrars, & Other Interested Parties

FROM: Jonnell Carpenter, *NCCCS General Counsel*

SUBJECT: Proposed Amendment of 1B SBCCC 500.2 – Education Records of Minor Students

DATE: August 19, 2025

On August 15, 2025, the State Board of Community Colleges (SBCC) initiated the rulemaking process to adopt **1B SBCCC 500.2 – Education Records of Minor Students**. The proposed adoption would allow each community college to adopt a policy that requires a minor student to complete an acknowledgement form, prior to course registration, regarding parental access to their education records. The proposed adoption is published on the NC Community College System's website, [Numbered Memos - NCCCS \(ncccommunitycolleges.edu\)](https://ncccommunitycolleges.edu). For your convenience, a copy of the proposed rule, with the adopted language indicated, is attached to this memorandum. Strikethroughs indicate deletions of existing language and underlines indicate additions of language.

Any member of the public has the right to submit written comments on the proposed rule. Please note that any person who submits public comments on behalf of their community college should comply with their college's local process for submitting comments on a proposed rule. **Written comments on the rule must be received by no later than 5:00 p.m. on September 18, 2025.** Any member of the public has the right to request a hearing on the proposed rule. **Requests for a hearing must be received by no later than 5:00 p.m. on September 3, 2025.**

Written comments and requests for hearing shall be directed to the following address:
Jonnell Carpenter, 5001 Mail Service Center, Raleigh, NC 27699-5001 or by email to
publiccomments@nccommunitycolleges.edu. Thank you for your attention to this matter.

CC25-071

Email Copy
Attachment



State Board of Community Colleges Code

Notice of Proposed Rulemaking Form

Date: August 19, 2025

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| Title, Chapter, Subchapter, and Rule Number of Rule Proposed to be Adopted, Amended, or Repealed | Adoption of 1B SBCCC 500.2 – Education Records of Minor Students |
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Specify whether the SBCC proposes to amend, adopt, or repeal a rule:

Adopt
(new rule)

Amend
(change existing rule)

Repeal
(delete entire rule)

| | | |
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| X | | |
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| Rationale for proposed adoption, amendment, or repeal: | The proposed code adoption allows each community college to implement a policy requiring minor students (under age 18) to complete an acknowledgment form prior to course registration. This form informs student of parental access to their education records, in compliance with SL 2025-46, also known as Leon's Law. |
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| Proposed Effective Date of Rule | November 1, 2025 |
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1B SBCCC 500.2 is proposed for adoption as follows:



State Board of Community Colleges Code
TITLE 1 – COMMUNITY COLLEGES

CHAPTER B. COLLEGE OPERATIONS

SUBCHAPTER 500. STUDENT RIGHTS AND RESPONSIBILITIES

1B SBCCC 500.2 Education Records of Minor Students

(a) Definitions – The following definitions apply in this section:

(1) Dependent – As defined in section 152 of the federal Internal Revenue Code of 1986.

(2) Education records – As defined in 34 C.F.R. § 99.3.

(3) FERPA – Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g.

(4) Minor student – A student who is under the age of 18 and a dependent of his or her parent.

(5) Parent – The parent, guardian, or an individual acting as a parent in the absence of a parent or guardian of the minor student.

(b) Each community college shall adopt a policy that requires a minor student to complete a form, prior to registration in any course, acknowledging the following:

(1) To the extent allowed under FERPA, the education records of the minor student shall be provided to the student's parent as long as the parent has not opted out of receiving the education records.

(2) To the extent allowed under FERPA, the education records of the minor student shall be provided to the school administrators and school counselors at the school in which the student is dually enrolled.

History Note: Authority G.S. 115D-5

Eff. _____