

AVON GROVE SCHOOL DISTRICT

SECTION: PUPILS
TITLE: EDUCATION RECORDS
ADOPTED: NOVEMBER 9, 2006
REVISED: MARCH 12, 2009

<p>1. Definitions</p> <p>20 U.S.C. § 1232g; 34 C.F.R. Part 99.</p> <p>20 U.S.C. § 1417(c); 34 C.F.R. §§ 300.123; 300.610-627.</p> <p>20 U.S.C. § 1232h; 34 C.F.R. Part 98.</p> <p>SC 510, 1305-A, 1306-A, 1307-A, 1409, 1532.</p> <p>22 Pa. Code § 12.31-12.32.</p> <p>BEC 22 Pa. Code § 12.31</p>	<p style="text-align: center;">216. EDUCATION RECORDS</p> <p>The following terms as used in this policy shall have the following meanings:</p> <p>1.1 <i>Biometric record.</i> As used in the definition of personally identifiable information, is <u>means</u> a record of one or more measures <u>of-able</u> biological or behavioral characteristics that can be used for automated recognition of an individual. Examples include fingerprints, retina and iris patterns, voiceprints, DNA sequence, facial characteristics, and handwriting.</p> <p>1.2 <i>Directory information.</i> Information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Directory information, includes, but is not limited to, the student's name, address, telephone number, e-mail address, date and place of birth, photograph, dates of attendance, grade level, whether the student graduated and the date of graduation, honors and awards received, participation in District-recognized extracurricular activities and sports, weight and height of athletic team members, and schools attended within the District.</p> <p>1.3 <i>Disclose; disclosure.</i> Permit access to or release, transfer, or otherwise communicate, personally identifiable information contained in the education records by any means, including oral, written, or electronic means, to any party except the party identified as the party that provided or created the record.</p> <p>1.4 <i>Education record.</i> Any record, that is directly related to the student; and is maintained in any office or school building of the District, the Chester County Intermediate Unit, a vocational technical school, or any private school or facility that the District is using to provide free elementary or secondary education to the student in place of a public school.</p> <p>The term does not include the following:</p> <p>(a) records of instructional, supervisory, and administrative personnel and educational personnel ancillary to those persons, including, but not limited to, instructional support teachers, counselors, therapists and clinicians, school psychologists and psychiatrists, nurses, and instructional aides, that are used only as a personal memory aid, that are kept in the sole possession of the maker</p>
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	<p>of the record and the contents of which are not accessible or revealed to any other person except a substitute for the maker of the record;</p> <p>(b) records created or received by the District only after the individual is no longer a student in the District or receiving District-supported education and that are no directly related to the individual’s attendance as a student;</p> <p>(c) records of law enforcement units, as set forth in Board Policy 816;</p> <p>(d) other records specifically excluded from the definition of “education record” under the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and its implementing regulation, 34 C.F.R. Part 99.</p> <p>1.5 <i>Eligible student.</i> A present or former student who has attained the age of eighteen or a former student who is attending an institution of post-secondary education.</p> <p>1.6 <i>Emancipated minor.</i> A student below the age of twenty-one who has chosen to establish a domicile apart from the continued control and support of parents or guardians. The term includes a minor living with a spouse.</p> <p>1.7 <i>IEP.</i> Individualized education program.</p> <p>1.8 <i>Law enforcement unit.</i> As defined in Board Policy 816.</p> <p>1.9 <i>Parent.</i> The natural or adoptive parents of a student, regardless of residency or physical custodial status; the legal guardian or guardians of a student; or an individual acting as a parent in the absence of a natural parent or guardian.</p> <p>1.10 <i>Personally identifiable information.</i> Any one or more of the following:</p> <p>(a) The student’s name;</p> <p>(b) The name of any member of the student’s family;</p> <p>(c) The address of the student or any member of the student’s family;</p> <p>(d) A personal identifier such as a social security number or student number, or biometric record;</p> <p>(e) Other indirect identifiers, such as the student’s date of birth, place of birth or mother’s maiden name;</p> <p>(f) Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the school community,</p>
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Comment [MSOffice1]:

	<p>who does have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or</p> <p>(g) Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the educational record relates.</p> <p>1.11 <i>Record.</i> Any information recorded in any way, including, but not limited to, handwriting, typed, print, computer media, video or audio tape, film, microfilm, microfiche, film, or digital media.</p> <p>1.12 <i>School official with a legitimate educational interest.</i> Any employee or contractor of—</p> <ul style="list-style-type: none"> (a) the District, (b) the Chester County Intermediate Unit, (c) a vocational technical school, or (d) any public or private school or facility that the District is using or is proposing to use to provide elementary or secondary education to the student in place of a public school, who is or will be responsible for providing or supervising the provision of education, education-related services, or extracurricular activities or experiences to or for the student, when— <ul style="list-style-type: none"> (i) particular information concerning that student is presently or potentially relevant to the provision of such education, education-related services, or extracurricular activities or experiences, or (ii) when such information is necessary to protect the health, safety, or welfare of other students with whom the student might have contact. <p>The phrase also applies to clerical staff of the agencies enumerated above who are responsible for the maintenance and security of education records and to attorneys, consultants, and school board members when school board action concerning the student is required by law or when the education or treatment of the student is the subject of present or potential litigation or legal dispute.</p> <p>1.13 <i>Student with disabilities.</i> A student age three through twenty-one who has or is thought to have one or more of the disabilities described in the Individuals with Disabilities Education Act, 20 U.S.C. §§ 1400 <i>et seq.</i>, or any preceding or succeeding legislation, for which he or she is eligible or thought to be eligible for special education and related services.</p>
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<p>2. Collection, Maintenance, and Destruction of Education Records</p> <p>SC 1305-A, 1306-A, 1307-A</p>	<p><i>Collection</i></p> <p>2.1 The District shall collect and maintain the types of records described in the following subparagraphs (a) through (c) and may collect and maintain records described in following subparagraphs (d) through (j):</p> <p>(a) Core data, consisting of the name of the student; last known address and domicile within the District of the parents or guardian of the student or, if the student is emancipated, of the student; the birth date of the student; the course, subject area, or project work completed by the student and the level of achievement attained; the last grade attended or the date of graduation and type diploma issued; and attendance data;</p> <p>(b) Discipline and law enforcement records, including the sworn statement or affirmation of suspension or expulsion required at registration and the record of incidents of violence maintained in a form prescribed by the Pennsylvania State Police as required under Section 1307-A of the Pennsylvania Public School Code, 24 P.S. § 13-1307-A, and, in a file maintained separately from other records concerning the student, information from the Office of Juvenile Probation concerning adjudications of delinquency;</p> <p>(c) Health records, including immunization information, results of vision and hearing screenings, results of state-mandated physical examinations, in-school treatment and drug dispensing or administration orders or prescriptions from physicians, treatment and drug dispensing or administration logs, and health-related information provided by parents or guardians;</p> <p>(d) Student work samples and teacher grade books retained for purposes of ongoing assessment, instructional planning, or grade calculation; the results of District-wide group standardized or criterion-referenced testing and state-wide criterion-referenced assessments, if any, in which the student participated; and non-cumulative report cards;</p> <p>(e) Records of awards and distinctions earned by students for work or activities in school and in the community and of participation in District-approved extracurricular activities;</p> <p>(f) Guidance department, psychologist, and student assistance team records, although personal records and notes maintained strictly in accordance with Section 1.4(a) of this policy are not considered records subject to this policy;</p> <p>(g) Results of vocational and career aptitude and interest surveys, or of surveys to assist in planning for and providing guidance, health, or drug and alcohol abuse prevention instruction or programs;</p>
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<p>20 U.S.C. § 1232h,</p>	<p>(h) Reports of and other information describing or summarizing the results of individual testing and assessment by instructional support, child study, multi-disciplinary, or IEP teams, or by professional staff responsible for determining eligibility for Title I, ESL, and other remedial programs, or by agencies and individuals not employed by or working on behalf of the District; instructional support or child study team action plans; IEPs; and service agreements or accommodation plans;</p> <p>(i) Protocol sheets and booklets; scoring sheets; answer books; rating forms; observation notes; anecdotal logs; running record forms; and other forms of raw data gathered in the course of testing and assessment or progress monitoring and assessment; and</p> <p>(j) Other records required by law or deemed by instructional or supervisory staff to be both accurate and necessary to the provision of education, education-related services, or extra-curricular activities or experiences.</p> <p>2.2 By adoption of this policy, the District Board of School Directors gives consent for the collection of records and information described in Subsections (a), (d), and (e) of Section 2.1 of this policy.</p> <p>2.3 By adoption of this policy, the District Board of School Directors gives consent for the collection of records and information described in Subsections (b), (c), and (f) of Section 2.1 of this policy, unless the collection of such records and information is accomplished by use of a survey, analysis, or evaluation that requires or encourages the student to reveal—</p> <ul style="list-style-type: none"> (a) political affiliations or beliefs of the student or the student’s family; (b) mental and psychological problems of the student or the student’s family; (c) sexual behavior or attitudes; (d) illegal, anti-social, self-incriminating, or demeaning behavior; (e) critical appraisals of persons with whom the student has close family relationships; (f) information protected by legal privilege; (g) income, unless income information is necessary to determine eligibility for participation in a program or for receiving financial assistance under the program;
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	<p>(h) religious practices, affiliations, or beliefs of the student or the student’s family.</p> <p>When a survey, analysis, or evaluation is used to obtain such information, the District shall obtain prior informed consent in writing and in a form consistent with Section 2.6 of this policy. For purposes of this policy, the phrase “survey, analysis, or evaluation” shall be limited to a planned method of inquiry or information collection used on a group or individual basis. The phrase does not apply to the ordinary give-and-take exchange that occurs in the course of the counselor-student, psychologist-student, teacher-student, or nurse-student relationship when the student initiates the contact or otherwise participates in it voluntarily. Consent otherwise required by this Section is not required to investigate or substantiate a good faith suspicion of child abuse or neglect when the person from whom consent would be required is suspected of the abuse or neglect.</p> <p>2.4 To collect records and information described in Subsection (g) of Section 2.1 of this policy, the District shall obtain prior informed consent in writing and in a form consistent with Section 2.6 of this policy.</p> <p>2.5 To collect records and information described in Subsections (h) and (i) of Section 2.1 of this policy, other than reports and other documents provided by parents, the District shall obtain prior informed consent in writing and in a form required by applicable state or federal law or, in the absence of a specific applicable law, in a form consistent with Section 2.6 of this policy. For purposes of collecting information in the form of an instructional support or child study team action plan, an IEP, or a service agreement or accommodation plan, a written invitation to the parents and, when required by law, the student to participate in the development of such document shall constitute an adequate means of obtaining consent to develop the document, even if the parents or student do not participate in the meeting at which the content of the document is discussed. The description in an action plan, IEP, or service agreement or accommodation plan of a means of data collection or ongoing progress monitoring or assessment shall suffice to allow such activities without need for additional written consent.</p> <p>2.6 When state or federal law does not specifically prescribe the form for obtaining prior written consent as required by this policy, such consent shall be obtained by mailing to the residence of record, as established in accordance with Section 4 of this policy, or by hand delivery to the parent or emancipated minor a written consent form that complies with the following requirements and is received a reasonable time prior to the information collection activity for which consent is sought:</p> <p>(a) The form shall use language that a layperson can readily understand and shall be written in the native language of the parent or emancipated minor from whom consent is sought;</p>
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	<p>(b) The form shall contain an explanation of the type of information sought, the purpose for which the information is sought, and the specific types of testing, assessment, or data collection to be used to obtain the information;</p> <p>(c) The form shall make clear to the parent or emancipated minor that consent is required to proceed with the information collection activity or activities proposed, shall contain an assurance that such activity or activities will not proceed without consent, and shall contain a clear explanation of the time and place for responding to the form;</p> <p>(d) The form shall contain the name and number of a contact person whom the parents or emancipated minor can contact to obtain additional information about or seek clarification concerning the proposed activity;</p> <p>(e) The form shall provide a space for the parent or emancipated minor to elect whether to grant or withhold consent by marking one of two clearly-worded options and by signing their name.</p> <p>2.7 When a student who has attended another Pennsylvania public or private school registers to attend public school in the District, the District shall immediately request a certified copy of the student’s disciplinary record and a copy of the student’s health record from the public or private school the student last attended.</p> <p><i>Maintenance—Time</i></p> <p>2.8 Education records shall be maintained for a period of time in accordance with the Records Retention Schedule Worksheet, Policy 800-AR.</p> <p><i>Maintenance—Location</i></p> <p>2.9 Education records shall be maintained in a location in compliance with Board Policy 800, provided that information furnished by the Office of Juvenile Probation in accordance with Section 6341(b.1) of the Juvenile Act, 42 P.S. § 6341(b.1), shall be maintained in a secure file separately from other records concerning the student.</p> <p>2.10 Every file from which access might be had by, or disclosure might be made to, persons or agencies other than the parents, the eligible student, school officials with a legitimate educational interest, state or federal educational agency auditors, persons with written consent from the parent or eligible student, or persons seeking only directory information shall have as part thereof an access and disclosure log that consists of the following:</p> <p>(a) The identity of such person or agency to which access is granted to or disclosure made from the file;</p>
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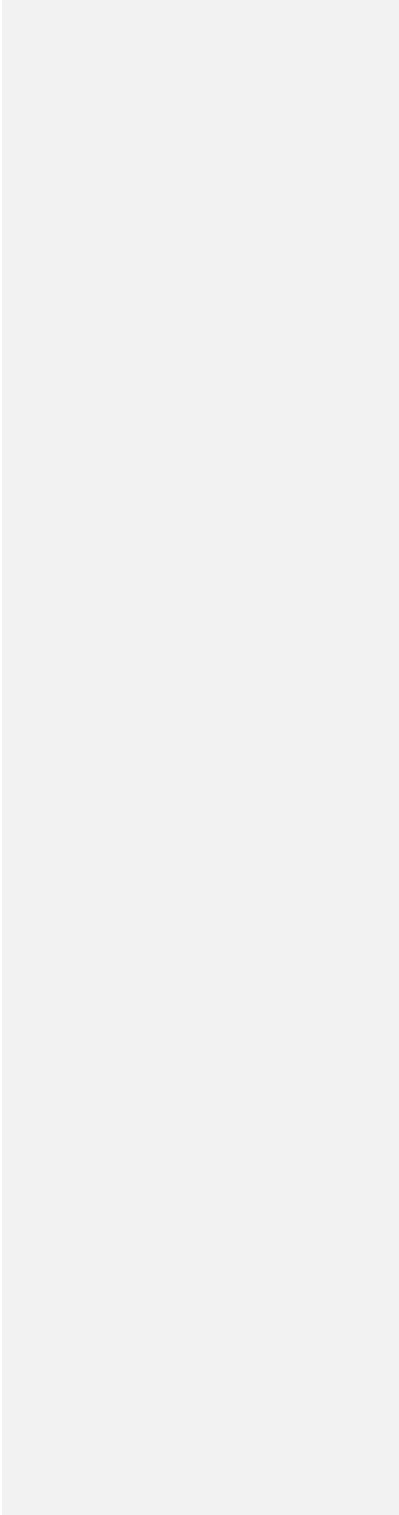
	<p>(b) The purpose for which access was granted or disclosure made;</p> <p>(c) The date of access or disclosure;</p> <p>(d) The name or initials of the person granting access or making the disclosure; and</p> <p>(e) In the case of disclosures to persons who will make further disclosures or allow further access on behalf of the District, the identity of the person or agency to whom or to which, and the specific purpose for which, such further disclosure or access will be made or allowed.</p> <p><i>Destruction</i></p> <p>2.11 The District shall destroy education records in accordance with the Records Retention Schedule Worksheet, Policy 800-AR, and Board Policy 800.1.</p> <p>2.12 When the District determines that any portion of the education record of a student with disabilities, other than health records or core data, is no longer relevant to the education of the particular student, it shall so notify in writing either his or her parents or the student directly, if he or she is an eligible student, of this determination. The written notice shall be in the native language of the parents or the eligible student, shall be mailed to the last known address of the parent or the eligible student and shall—</p> <p>(a) identify the specific records or categories of record that are no longer relevant;</p> <p>(b) contain an explanation that the District <i>shall</i> destroy the records thus identified if a parent or the eligible student so requests and that the District <i>may</i> destroy such records without a request; and</p> <p>(c) contain the name and number of a contact person whom the parents or eligible student can contact to obtain additional information about or seek clarification concerning the records thus identified.</p> <p>If the parent or eligible student so requests in writing after receipt of the notice, the District shall destroy the education records thus identified.</p> <p>2.13 The District shall not destroy any record that is the subject of a request for access or subject to a litigation hold.</p>
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<p>3. Amendment of Records and Due Process</p>	<p>3.1 A parent or eligible student may request in writing that the District amend any portion of an education record that he or she believes is inaccurate, misleading, or in violation of the student’s right to privacy. If a parent or eligible student makes such a request orally, the person to whom such request is made shall inform the parent of the obligation to make such request in writing.</p> <p>3.2 Within thirty school days of the receipt of the written request to amend the education record, the administrator who is primarily responsible for maintenance of the challenged record shall notify the parent or eligible student in writing of whether the District will amend the record. If the District determines that it will grant the request to amend, the notice to the parent or eligible student shall either describe the amendment, which can include the expungement or deletion of records or information contained therein, or enclose a copy of the amended record. If the District determines that it will not amend the record, the notice shall so inform the parent or eligible student and shall contain a statement explaining that the parent or eligible student has the right to request in writing a hearing before a disinterested school official to challenge the determination not to amend.</p> <p>3.3 Within ten school days of receipt of a request for a hearing to challenge a determination not to amend an education record, the District shall notify the parents or eligible student of the date, time, and location of the hearing. The notice shall be mailed certified, return receipt requested, or by similarly secure and verifiable means, in such time that the parent or eligible student receives it at least five school days before the hearing. The hearing shall occur within thirty days of receipt of the request for the hearing from the parent or eligible student.</p> <p>3.4 The hearing shall be held before the Superintendent or his or her designee or, if the Superintendent or the designee has a direct interest in the outcome of the hearing, before the principal of the building to which the student is currently assigned or his or her designee.</p> <p>3.5 The hearing shall be informal, unrecorded, and not subject to formal rules of evidence or procedure other than those required to maintain order. The parent or eligible student shall have a full and fair opportunity to present evidence in support of his or her position and may be represented at his or her expense by an adviser, including an attorney.</p> <p>3.6 Within thirty days of the completion of the hearing, the District shall issue to the parent or eligible student a written decision concerning the amendment of the record that shall either—</p> <p>(a) describe the amendment, which can include the expungement or deletion of records or information contained therein, or</p>
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<p>4. Access and Disclosure</p>	<p>(b) explain the reasons for denying the request to amend and inform the parent or eligible student of the right to place a statement in the education record of the student commenting on the contested information in the record or explaining why he or she disagrees with the decision not to amend, or both.</p> <p>The written decision shall be based solely on the evidence presented at the hearing and shall summarize the evidence thus presented and the reasons for the decision to amend or refuse amendment.</p> <p>3.7 If the parent or eligible student chooses to submit a statement in the education record of the student commenting on the contested information in the record or explaining why he or she disagrees with the decision not to amend, the District shall—</p> <p>(a) maintain such statement as part of the record for as long as the District maintains the contested record or information; and</p> <p>(b) disclose the statement whenever it discloses that portion of the record to which the statement pertains.</p> <p><i>Access</i></p> <p>4.1 The District shall allow the parents or eligible student to inspect and review the education record of the student within forty-five calendar days of receipt of a verbal oral or written request to do so. District staff shall make every reasonable effort to ensure that requested records are provided to the parents at the earliest possible date.</p> <p>4.2 The District shall respond to all reasonable requests from the parents or eligible student for an explanation or interpretation of information contained in the education record.</p> <p>4.3 If circumstances effectively preclude the parents or eligible student from inspecting or reviewing the education record, or any portion thereof, the District shall provide the parents or the eligible student with a copy of the record subject to the request. When copies are not required to ensure that the parents or the eligible student has the opportunity to inspect and review the education record, the District may charge a fee in accordance with Board Policy 801 to copy requested portions of the education record, unless the parents or the eligible student can establish that they are unable to pay the amount thus charged.</p> <p>4.4 When the District receives a request to inspect and review the education record of a student with disabilities in anticipation of a meeting of the IEP or multi-disciplinary team or a due process hearing, the District shall respond to such request within a reasonable time prior to the meeting or hearing, the time allowed by Section</p>
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<p>34 C.F.R. § 99.31</p> <p>34 C.F.R. § 99.34</p> <p>34 C.F.R. § 99.36</p>	<p>4.1 of this policy notwithstanding.</p> <p>4.5 When parents or an eligible student seek to inspect and review a record that contains personally identifiable information concerning more than one student, the District shall provide access only to that portion of the record that pertains to the student in question.</p> <p>4.6 School officials with a legitimate educational interest may at any time inspect and review, and obtain copies of, the education record and personally identifiable information in which they have such interest.</p> <p><u>4.7 Effective July 1, 2011, parents and eligible students may request copies of transcripts from the District at any time. Parents and eligible students will be charged a \$5.00 processing fee. Payment shall be made with a personal check or U.S. Postal Service money order made out to Avon Grove School District.</u></p> <p><i>Disclosure</i></p> <p>4.87 Any disclosure of personally identifiable information concerning a student to any person other than the parent, the eligible student, or school officials with a legitimate educational interest shall require the prior written consent of the parent or the eligible student. Any document providing such consent shall—</p> <ul style="list-style-type: none"> (a) identify the particular portions of the education record or the particular information or types of information concerning the student that shall be disclosed; (b) identify the person or agency to whom or to which disclosure will be made; (c) identify the purpose of the disclosure; and (c) contain the signature of at least one parent or the eligible student. <p>4.98 Prior written consent from the parent or the eligible student is not required when the disclosure of education records or information is to one of the following persons or agencies under the following circumstances:</p> <ul style="list-style-type: none"> (a) To an educational agency or institution at which the student seeks to enroll, intends to enroll, or is enrolled, or from which the student receives services, when that agency or institution requests such records, as long as— <ul style="list-style-type: none"> (1) the parent or eligible student is provided on request with a copy of the records thus disclosed; and (2) the parent or eligible student is afforded on request a hearing as
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	<p>disclosure shall be subject to the limitations established by law and this policy upon the disclosure of directory information;</p> <p>(k) Under such additional circumstances and to such additional persons and agencies as are permitted by the Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g, and its implementing regulations.</p>
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<p>5. Miscellaneous Provisions</p>	<p>5.1 The policy of the District is to comply in full with the requirement of state and federal law governing the maintenance of records and other personally identifiable information and the privacy rights of students and their families. To the extent that any provision of this policy is construed as or found to be inconsistent with federal or state law, the District will treat that provision as null and void.</p> <p>5.2 The District shall send or deliver all notices and requests for consent required under this policy to the address identified as the residence of the child in the registration information maintained by the District. Unless it receives specific written information to the contrary, the District shall presume that all persons with authority to make educational decisions for the student have received or had the opportunity to review and respond to notices and requests sent or delivered to such address. The District will send notices and requests to separate addresses only when—</p> <p>(a) A person with joint authority to make educational decisions for the student, such as a divorced or separated natural parent or guardian, resides at that separate address; and</p> <p>(b) That person notifies the District in writing that he or she is not receiving or has not had the opportunity to review and respond to notices and requests sent to the residence to which the student is registered.</p> <p>5.3 The Supervisor of Pupil Services is the agency official who is responsible for ensuring confidentiality.</p>
<p>6. Public Notice 34 C.F.R. § 99.7</p>	<p>6.1 Annually, at least thirty days prior to the beginning of the school term, the District shall publish to all parents of students currently in attendance and to all eligible students currently in attendance a complete copy of this policy in English and Spanish. The following notice shall precede the text of this policy and shall appear with the heading in boldface type or other similarly conspicuous format:</p> <p style="text-align: center;">NOTICE OF IMPORTANT RIGHTS <i>Concerning the Maintenance, Access to, and Amendment and Disclosure of Education Records by the Avon Grove School District</i></p> <p>Printed below is the full text of the Education Records Policy of the Avon Grove School District. This policy contains information of importance to students attending public schools and public school sponsored programs. Several provisions of this policy warrant careful attention:</p> <p>Designation of certain records containing personally identifiable information as “directory information.” In Section 1.2 of this policy, the District designates certain kinds of information as “directory information.” The District will provide this information to any interested person, including armed forces recruiters who request</p>

it, without seeking consent from the parents of the student or the student. If you do not want the District to disclose such information, *you must so notify the District in writing on or before the first day of the school term, which is _____*. Your written notice must identify the specific types of directory information that you do not want the District to disclose without consent. If you fail to notify us in writing by the first day of the school term, we may release directory information upon request and without consent.

Disclosure of records containing personally identifiable information to other schools and institutions. Section 4.98(a) of this policy allows the District to disclose personally identifiable information concerning a student to an educational agency or institution at which the student seeks to enroll, intends to enroll, or is enrolled, or from which the student receives services, when that agency or institution requests such records.

Access to records by school officials with a “legitimate educational interest.” Section 4.6 of this policy allows school officials with a legitimate educational interest to have access to personally identifiable information without parent or student consent. In Section 1.12 of this policy, the District designates those persons who have a “legitimate educational interest” that would allow such access to education records.

Amendment of education records. Section 3 of this policy describes how a parent or a student who has attained the age of 18 can request that records be amended. This Section also describes in detail the right of the parent or eligible student to request a hearing to challenge a decision by the District not to amend records that the parent or student believes are inaccurate, misleading, or in violation of the student’s right to privacy.

Complaints to the United States Department of Education. Complaints concerning alleged failure of the District to comply with the requirements of the Family Educational Rights and Privacy Act may be addressed to the United States Department of Education as follows:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, DC 20202-4605

RESIDENTS OF THE AVON GROVE SCHOOL DISTRICT WITH CHILDREN IN PUBLIC SCHOOL OR WHO ATTENDED PUBLIC SCHOOL IN THE DISTRICT IN THE PAST SHOULD READ THE FOLLOWING POLICY CAREFULLY FOR A FULL EXPLANATION OF THEIR PRIVACY RIGHTS AS A PARENT OR STUDENT