

FERPA: Understanding Student Privacy in the Digital Age



Office of the Registrar



- **WHAT IS FERPA?**
- **HOW THE OFFICE OF THE REGISTRAR SUPPORTS FERPA COMPLIANCE**
- **FERPA IN THE DIGITAL AGE**
- **FERPA BEST PRACTICES**
- **QUESTIONS**



The **Office of the Registrar** is responsible for the accuracy and integrity of the academic record.

Serving all students, faculty, academic units, and student support functions; the Office is charged with the implementation of academic and student policies and their alignment to state and federal regulations and accreditation standards.

The Office strives to be a leader and thought partner in creating efficient processes that are designed in a way that supports student success and service excellence.



Office of the Registrar

Introductions



Alex Underwood
University Registrar



Amanda Gluski
Associate Registrar,
Graduation, Records &
Certifications



Maggie Ramirez
Associate Registrar
Registration, Residency &
Transcripts



Michael Davenport
Associate Registrar
Compliance, Systems &
Reporting





What is FERPA?

Family Educational Rights and Privacy Act of 1974 (FERPA)

- FERPA is a federal law that governs the rights of students and institutional responsibilities with respect to education records.
- FERPA grants all university students:
 - The right to inspect and review their own "education records" (as defined by the statute), with certain limited exceptions, within 45 days after the University's receipt of a request
 - The right to seek the amendment of their "education records" in certain circumstances
 - The right to consent to the disclosure of personally identifiable information contained in their "education records" in many circumstances
 - The right to file a complaint with the U.S. Department of Education about alleged failures to comply with FERPA.



The Basics of FERPA



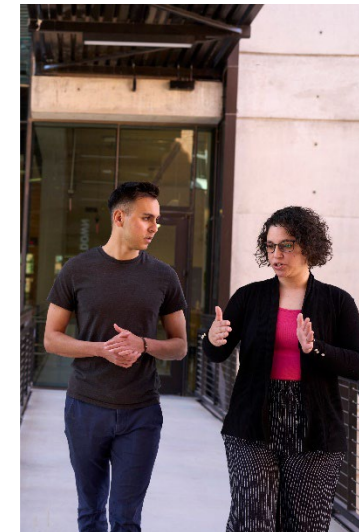
With only a few exceptions (described below), the student's education record is considered confidential and neither they nor personally identifiable information from them may be disclosed to others without the written consent of the student.



Faculty or staff members have a legal responsibility to protect a student's education record in their possession from unauthorized disclosure, access, or use.



Faculty or staff members may access student information only when and to the extent that it is needed for legitimate completion of their responsibilities as a university employee.



With only limited exceptions, students have a right to see our records about them, including even casual and informal records such as emails and handwritten notes to the file; with that in mind, all records about students should be created deliberately and thoughtfully.



What is a Student Education Record?

What is an education record?

- admissions files for students who are accepted and enrolled, including applications, recommendations, high school transcripts, and rater evaluations
- biographical information about students such as date and place of birth, gender, nationality, race, ethnicity, and identification photographs
- communications in typed, handwritten, emailed, or other recorded form to, from, or about students
- course work including papers, exams, grades, and evaluations
- disciplinary records
- internship program records
- personal information shared through course assignments, class discussions, evaluations, and office hour visits
- student financial and financial aid records
- student identification number (SID)
- details about student status such as academic specialization and activities, class schedules, and courses taken

What is NOT an education record?

- Most University of Arizona Police Department records about law enforcement issues
- Employment records about non-student staff and faculty members who take courses at the University; however, records pertaining to their student status and activities, as well as employment records about student employees, are subject to FERPA
- Campus Health records concerning the diagnosis and treatment of student physical and mental health
- Alumni and Development Office records about former students that do not relate to or contain information about the subject as a student (e.g., information collected by the University pertaining to post-graduation alumni accomplishments)
- Records that are kept in the sole possession of their maker, that are used only as personal memory aids or reference tools, and that are not shared with or made accessible to others (e.g., personal reminder or summary notes about a meeting with a student).





How the Office of the Registrar Supports FERPA

Student records and management of these records

- **Authorization for Release of Information**
 - How to see if a student has completed a release and who is named as a person who has access
 - Resource Guide: [Verify Authorization for Release of Student Information](#)
 - **Just because you can, doesn't mean you should**
- **Guest Center Access**
 - Allows a person the student grants access to see and take limited action such as make payment to an account
 - Access may be granted to academic, personal, and/or financial information
- **Directory Information Restrictions**
 - Students may restrict the release of directory information which prohibits any university official from releasing this information
 - Resource Guide: [Viewing Directory Information Restrictions](#)



How the Office of the Registrar Supports FERPA

Requests for Information

Directory Information Requests

- External Requests
- Internal Requests
- Solomon Amendment Requests

The University of Arizona designates the following items as general directory information:

- Student's name*
- Local/Residence Hall address*
- Home and/or Cell telephone numbers*
- Official university email address*
- College
- Class standing/Classification
- Academic program (degree, major, minor)
- Dates of attendance
- Status (full or part-time registration)
- Degree(s) received
- Honors and awards received
- Participation in officially recognized activities
- Weight and height of members of athletic teams

Student Records Requests

Students have the right to review and inspect their educational record and the university must provide the records within 45 days of the request.





How the Office of the Registrar Supports FERPA

Reporting and Investigations

Reporting possible FERPA violations

- University officials
- Students
- Lost or Stolen Devices

FERPA Investigations

- How to respond if a possible violation has occurred
- Process may include reviewing the incident, creating a resolution plan, and documenting student record



FERPA Training & Support

Complete the role-specific training module:

INSTRUCTOR & INSTRUCTIONAL TEAM TRAINING

- Designed for any person leading or supporting course instruction
- Instructors, Teaching Assistants, Preceptors, Graders, etc.
- [Link to Edge Learning](#)

STAFF TRAINING

- Designed for any university employee who is not part of an instructional team, but who's role requires student data access
- [Link to Edge Learning](#)

Why is this training important?

Ensures our compliance with federal law
Ensures the security and privacy of student records

! ALSO AVAILABLE: one-on-one, situational support and guidance. We are here to help!



FERPA in the Digital Age

Location of Education Records

An **"education record"** under FERPA includes **any record containing personally identifiable information about students, maintained by the University or its representatives.**

When FERPA was passed in 1974:

- Printed papers and forms
- Handwritten notes
- Paper transcripts
- Grading books
- Microfiche, etc.
- Audio and video materials

FERPA now also includes:

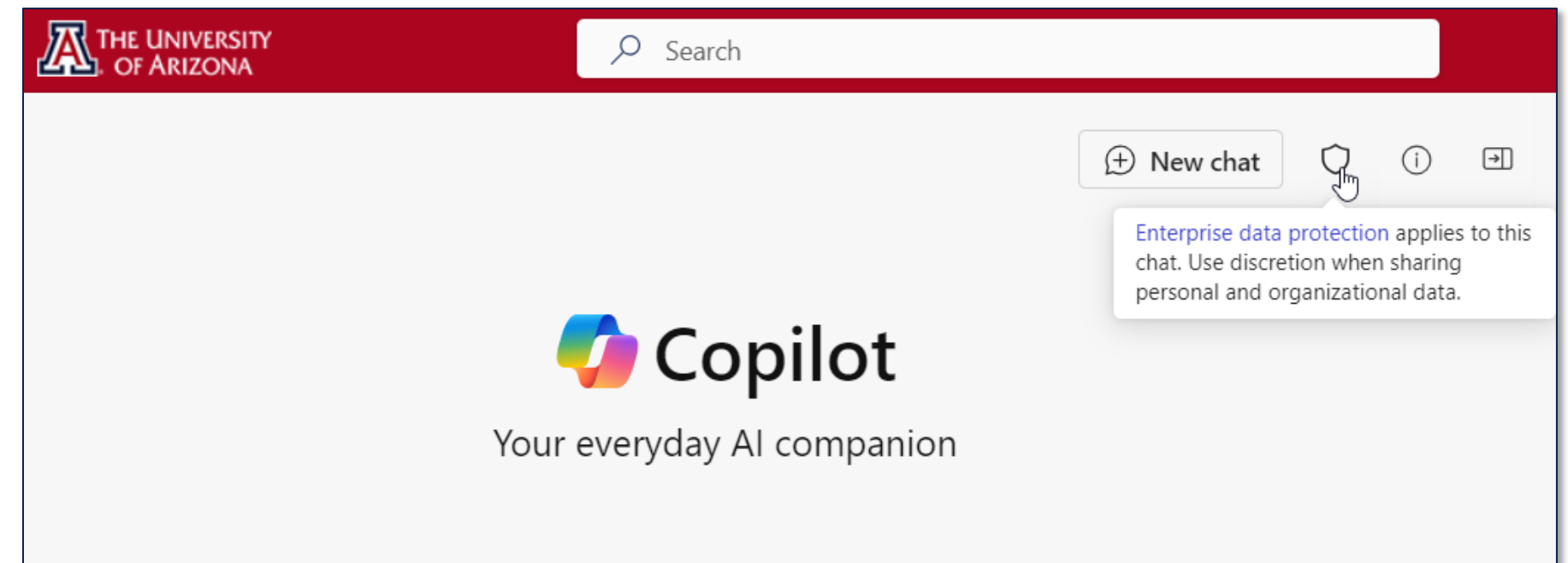
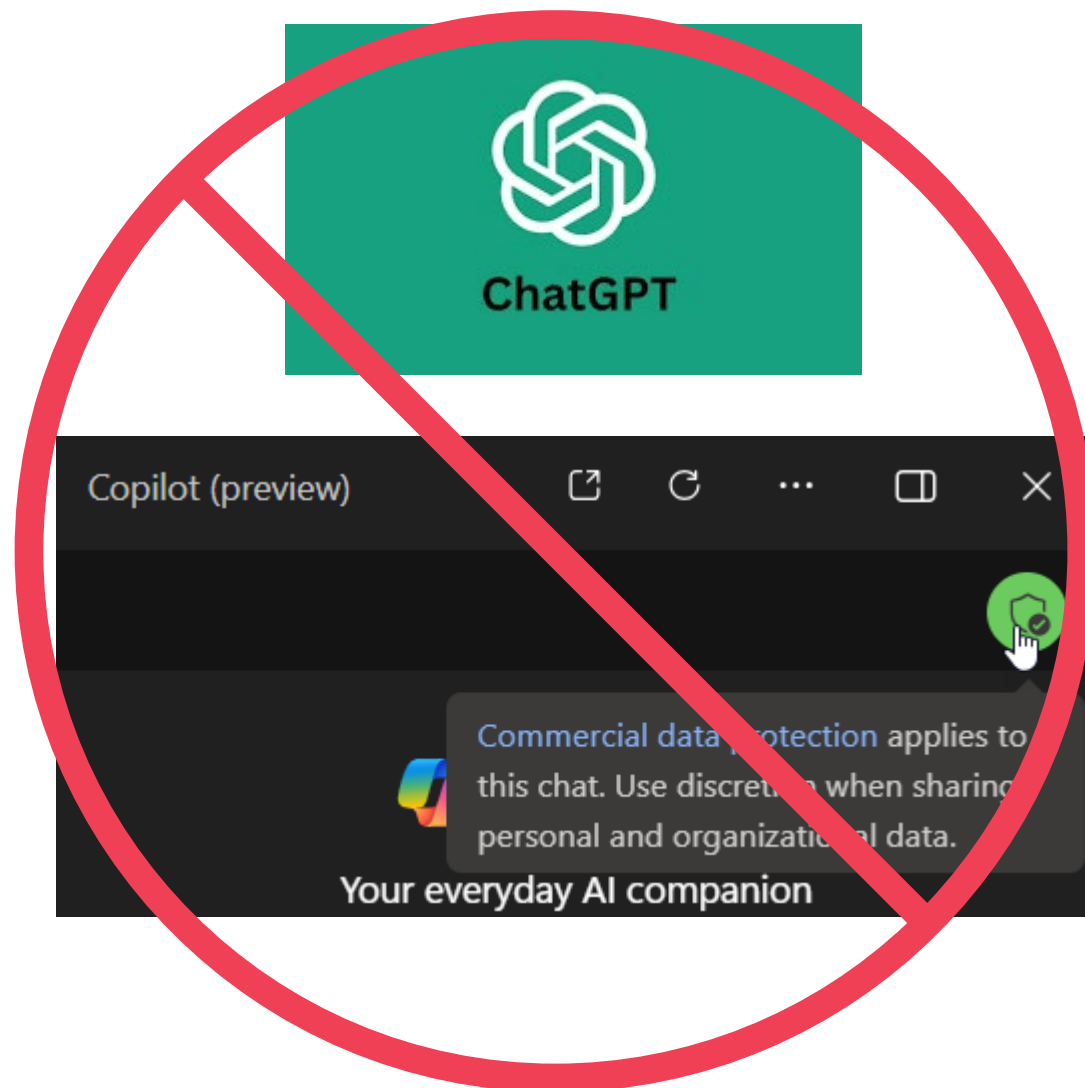
- Email
- Teams/Slack history
- Digital transcripts
- Learning management systems (D2L)
- Student Information Systems (UAccess)
- Customer Relationship Management (Trellis, Slate)
- Digital storage (Box, Sharepoint, OnBase, etc.)
- Third-party vendor solutions



FERPA & Artificial Intelligence (AI) Software

How this is changing our daily lives

- When thinking about the possibilities of AI it is important to understand how/when to utilize the options.
- NEVER provide student information to a non-secure university-approved AI tool.
 - This includes meeting notes where student information may be shared.



Use caution and edit student information out of questions/responses.

FERPA Do's and Don'ts



- **Use only university-provided computers and technology**
- Work behind WebAuth
- Use the VPN when not on a university network
- Save files to university provided cloud-based systems like Box or OneDrive
 - Ensure shared links are not open to everyone
- Use provided software and integrations that have been fully vetted for security and compliance
- Remove student information from an email when the topic becomes more about a broad issue.



- Use university email to sign up for free trial software
- Post videos/help guides without redacted student information
- Use student information with AI software that is not university-approved, i.e. that feeds into a Large Language model (LLM)
- Use a personal computer for university business
- Use personal email addresses for university business, including forwarding a university email to a Gmail or other address





FERPA Best Practices

When adding information to a student record:

- Use university email & systems for all communications
 - Do not forward a university email to a personal address
 - Do not send course information to non-university emails
- Use unbiased and clear language – keep personal opinion out of documentation
- Remove student information from an email when the topic becomes more about a broad issue.
- When using Zoom, double-check all recording and integration settings
- Ensure that everyone with access to FERPA-protected information (graders, preceptors, student workers at front counters) take a FERPA training and understand their obligations



FERPA Resources

- Link to website:
<https://registrar.arizona.edu/FERPA>
- Email registrar@arizona.edu for questions or support
- Request a department or team training!
(Zoom or in person)



Questions?





Office of the Registrar

Administration Building | Main Floor, Room 210

Phone: 520-621-3113 | Email: reghelp@arizona.edu

Office hours: Monday – Friday, 8:30 a.m. – 4:30 p.m.

website: registrar.arizona.edu