





Nebraska LEAs

The Privacy Technical Assistance Center (PTAC) Welcomes You!

We will start promptly at 1pm CST

United States Department of Education Privacy Technical Assistance Center







FERPA 101

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United States Department of Education Privacy Technical Assistance Center

FERPA PRE-TEST

- 1. Does FERPA only apply to schools that receive federal education funds?
- 2. Once a student turns 18, may the school share education records with the parents?
- 3. If a child is living with a grandparent who is responsible for the day-to-day care of the child, must the school provide the grandparent with access to the child's education records?
- 4. Are health records maintained by the school nurse considered to be education records?



FERPA PRE-TEST

- 5. Must schools provide parents with a copy of their child's education records upon request?
- 6. Must a school disclose student information that has previously been designated as directory information to a third party that requests access?
- 7. If a parent chooses to discuss a matter about his or her child in an open school board meeting, does that constitute "consent" under FERPA for school board members or other school officials to respond?



FERPA PRE-TEST

- 8. Does FERPA permit a parent to file a lawsuit against a school, district, or school board for violating their rights under FERPA?
- 9. Is having a data sharing agreement with an outside vendor sufficient for a school to disclose PII from education records to a vendor without consent of parents?
- 10. When a student transfers from School District A to School District B, can District A share all of the student's education records to District B without the consent of the parent, including disciplinary records and special education records?



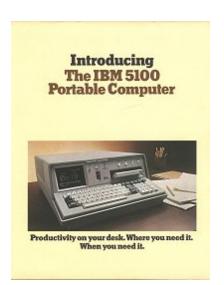
The world has changed

When FERPA was passed in 1974:

- Average house price was \$38k
- Average income was \$11k
- Federal spending was "only" \$269B
- You could buy a PC for the low, low price of \$20k

And...

- Disco was still cool
- Education records were mostly papers in the principal's office







What is FERPA?

A federal privacy law that affords parents the right to:

- have **access** to their children's education records,
- seek to have the records amended, and
- consent to the disclosure of personally identifiable information from education records, **except** as provided by law.

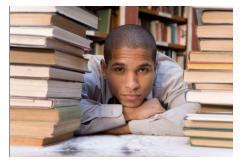




To which educational agencies and institutions does FERPA apply?







Elementary

Secondary

Postsecondary



U.S. Department of Education Funding







Pop quiz

A police officer shows up at the main office of a high school and asks if a certain student is attending school today. The police officer wants to speak to the student regarding some gang violence that occurred three weeks ago. The police officer does not have a court order.

Can the school tell the officer whether or not the student is attending school today?

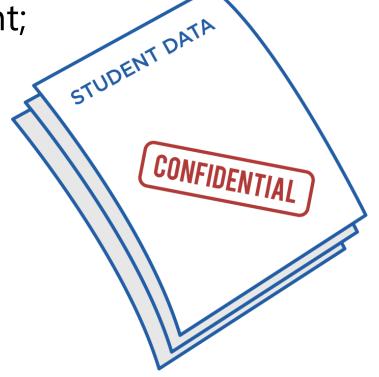


Just what is an education record?

"Education records" are records that are:

1. directly related to a student; and

2. maintained by an educational agency or institution or by a party acting for the agency or institution.





Education records exemptions

Exemptions to "education records" include, but are not limited to:

- Sole possession records used as a personal memory aid;
- Law enforcement unit records;
- Peer-graded papers before they are collected and recorded by teacher.



What about the Health Insurance Portability and Accountability Act (HIPAA)?

Records that are subject to FERPA are <u>not</u> subject to the <u>HIPAA Privacy Rule</u> (see page 82483, *Federal Register*, Vol. 65, No. 250, December 28, 2000).

 Health records on students, including immunization records, maintained by an educational agency or institution subject to FERPA are "education records."



So what's the answer then?

The secretary would have to log into the student information system to confirm the student was in attendance. That attendance record is an education record.

Without a court order or an imminent threat, this could not be disclosed.

But.....



So, Are Videos Education Records?



Think back to the definition!





Directly Related?! That sounds like FERPA-ish

Directly related is context specific considering the following factors...

- Used for disciplinary action or other official purposes
- Depictions of activities that:
 - 1. Resulted in disciplinary action
 - 2. Shows a violation of the law
 - 3. Shows an occurrence of student injury, attack, illness or health emergency
- Intent to make a specific student the subject
- Audio or visual record contains content that includes PII from a student's education record.



When Videos and Photos are NOT Education Records

- Students in the background
- Photos or videos without a focus on a specific student
- Records maintained by a law enforcement unit of an educational agency or institution for a law enforcement purpose
 - however, if unit provides a copy to the school, that copy may become an education record



Videos and Photos that are Records of Multiple Students

- A video can be the education record of multiple student (e.g. fights)
- In such an instance, educational agencies and institutions are required to allow a parent or eligible student, upon request, the opportunity to inspect and review the record without the consent of the other parent/ eligible student.
 - a) Prior to providing access institutions are required to redact or segregate when reasonable if it does not destroy the meaning of the video
 - b) Schools cannot charge for the redaction or segregation
 - c) Copies are allowed but not required



Law enforcement units & records

"Law enforcement unit" means any individual, office, department, division, or other component of a school that is officially authorized or designated by the school to:

- Enforce any local, state, or federal law, or refer to appropriate authorities a matter for enforcement of any law against any individual or organization other than the school itself; or
- Maintain the physical security and safety of the school.



Law enforcement units & records

Examples include:

- Unit of commissioned police officers
- Unit of non-commissioned security guards
- Fully equipped police units
- Smaller security office
- Vice-principal or other school official
- Local off-duty police officer
- School Resource Officer







Law enforcement units & records (cont.)

- Law enforcement unit records means those records, files, documents, and other materials that are:
 - Created by a law enforcement unit;
 - Created for a law enforcement purpose;
 and
 - Maintained by the law enforcement unit.



Pop quiz

John is a high school teacher. He wants to post the results of a math test so he runs a report that has the names, scores, gender and race/ethnicity of the students.

John wants to preserve the privacy of his students so he deletes the column with student name.

Does this remove the personally identifiable information?



PII is:

Personal Information





PII is:

Personally Identifiable Information

A one-handed pirate, with an irrational fear of crocodiles and ticking clocks





PII is:

Personally Identifiable Information





Personally Identifiable Information (PII)

Direct Identifiers

e.g., Name, SSN, Student ID Number, etc.
 (1:1 relationship to student)

Indirect Identifiers

- e.g., Birthdate, Demographic Information (1:Many relationship to student)
- "Other information that, alone or in combination, is <u>linked or linkable</u> to a specific student that would allow a <u>reasonable person in the school community</u>, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty." (§ 99.3)



What John Pulls from his SIS

Name	Race/Ethni city	Gender	Pirate Status	# of Hooks	GPA
	W	М	Υ	1	2.0
	А	F	N	0	3.5
	В	M	N	0	3.8
	W	F	N	0	2.0
	Н	M	N	0	3.3





Still Personally Identifiable?

Name	Race /Ethnicity	Gender	Pirate Status	GPA
	W	M	Υ	2.0
	Α	F	N	3.5
	В	M	N	3.8
	W	F	N	2.0
	Н	M	N	3.3





What about now?

Name	Race /Ethnicity	Gender	GPA
	W	M	2.0
	А	F	3.5
	В	М	3.8
	W	F	2.0
	Н	M	3.3





So is what John did ok?

No.

While the student's name is a direct identifier, gender and race/ethnicity are also considered to be personally identifiable information.



What rights do parents and eligible students have?

- Right to inspect and review education records;
- Right to request amendment of education records;
- Right to consent to disclosures, with certain exceptions; and
- Right to file a complaint with U.S. Department of Education regarding an alleged violation of FERPA.



Definition of "parent"

- Under FERPA:
 - "Parent" means a parent of a student and includes a natural parent, a guardian, or an individual acting as a parent in the absence of a parent or guardian.
 - Includes custodial and noncustodial parents.



Rights of parents (custodial and noncustodial)

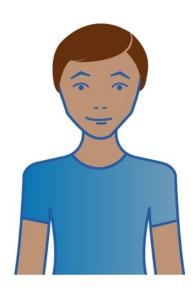
FERPA affords full rights to a parent, unless the school has been provided with evidence that there is a court order or State law that specifically revokes these rights.





Transfer of rights under FERPA

When a student turns 18 years old, or attends a postsecondary institution at any age they become an "eligible student" and, the rights under FERPA transfer from the parents to them.





Requirements for the inspection and review of education records

What rights exist for a parent or eligible student to inspect and review education records?



- Schools are generally required to give copies only if failure to do so would effectively deny access, or make other arrangements to inspect and review – example would be a parent or student who does not live within commuting distance.
- School may not destroy records if request for access is pending.



What are the procedures for amending education records?

- Parent or eligible student should identify the portion of the record believed to contain inaccurate or misleading information.
- School must decide within reasonable period of time whether to amend as requested.
- If school decides not to amend, must inform parent or eligible student of right to a hearing.
- After a hearing, if decision is still not to amend, parent or eligible student has a right to insert a statement in the record.



Prior written consent requirement

In order for a school to disclose education records, a parent or eligible student provide a signed and dated written

- Specify records that may be disclosed;
- State purpose of disclosure; and

consent. The consent must:

 Identify party or class of parties to whom disclosure may be made.

What are some of the exceptions to the general consent requirement?

- Directory information*
- To school officials with legitimate educational interests (defined in annual notification);
- To schools in which a student seeks or intends to enroll*
- To authorized representatives of specific federal agencies and state and local educational authorities conducting an audit, evaluation, or enforcement of federally- or state-supported education programs
- To organizations conducting studies for specific purposes on behalf of educational agency or institution;



^{*}Subject to Certain conditions (explained in more detail later on)

What are some of the exceptions to the general consent requirement? (cont.)

- In a health or safety emergency*
- To accrediting organizations to carry out their accrediting functions;
- To parents of a dependent student;
- To comply with a judicial order or subpoena (generally requires reasonable effort to notify parent or eligible student at last known address);



^{*}Subject to certain conditions (Explained in more detail later on)

What are some of exceptions to the general consent requirement? (cont.)

- To child welfare agency or tribal organization for those children in foster care, in order to address the student's education needs*
- To state and local officials pursuant to a state statute in connection with serving the student under the juvenile justice system*



^{*}Subject to certain conditions (Explained in more detail later on)

Exception: Directory information



Information in a student's education records that would not generally be considered harmful or an invasion of privacy if disclosed.





Exception: Directory information

- May include:
 - ✓ name, address, phone number, and e-mail address
 - ✓ photograph
 - ✓ date and place of birth
 - ✓ most recent school attended
 - ✓ grade level and major field of study
 - ✓ dates of attendance (e.g., year or semester)
 - ✓ participation in officially recognized sports and activities
 - height and weight of athletes
 - ✓ degrees, honors, and awards received
- Can never include Social Security Number
- Can't disclose non-directory information with directory information



Exception: Directory information (cont.)

- Annual notice must be given to parents of students in attendance and eligible students in attendance
- Parents may choose to "opt-out" of the disclosure of directory information on their child.
- School may adopt a limited directory information policy that allows for the disclosure of directory information to specific parties, for specific purposes, or for both.



Considerations for your School or District

- How are you tracking opt-outs?
- Have you seen your directory information policy?
- Have you verified that the only records you are releasing under the directory information exception are a part of your directory policy?



Exception: School official

- Schools may disclose PII from education records without consent if the disclosure is to other school officials within the school, including teachers, whom the school has determined to have legitimate educational interest.
- Annual notification of FERPA rights must include criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.



Exception: School official (cont.)

Outsourcing services under school official exception:

- Schools may outsource institutional services or functions that involve the disclosure of education records to contractors, consultants, volunteers, or other third parties provided certain conditions are met.
- If these outside parties meet the conditions for outsourcing, they may have access to education records.



Exception: School official (cont.)

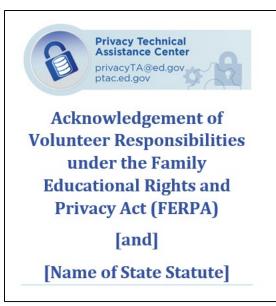
Conditions for outsourcing:

- Performs an institutional service or function for which the agency or institution would otherwise use its employees;
- Is under the direct control of the agency or institution with respect to the use and maintenance of education records;
- PII from education records may be used only for the purposes for which the disclosure was made, and may not be redisclosed without the authorization of the educational agency or institution and in compliance with FERPA;
- Meets the criteria specified in the school, LEA, or institution's annual notification of FERPA rights for being a school official with a legitimate educational interest in the education records.



Do you use volunteers?





- Do they know the rules?
- Are they sharing information from education records at the bus stop?
- Provide them training with this <u>video</u>.
- Use this brochure to explain the <u>rules</u>.



Considerations for your School or District

- What is in your annual notice?
 - Does it cover what you are doing under this exception?
- How do you manage access control in your organization?
 - Just because someone may have access to the SIS does not mean they have legitimate educational interest.



Exception: Disclosure to officials of another school

 Consent is not required to disclose personally identifiable information from education records to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for the purposes related to the student's enrollment or transfer.



Exception: Parents of a dependent student

 Consent is not required if the disclosure is to parents, as defined in §99.3, of a dependent student, as defined in section 152 of the Internal Revenue Code of 1986.



Exception: Health or safety emergency

- Disclosure is necessary to protect the health or safety of the student or others.
- There is an articulable and significant threat to the health or safety of a student or other individuals.
- Appropriate parties typically means local, state, or federal law enforcement, trained medical personnel, public health officials, and parents.
- Must be related to an actual, impending, or imminent emergency.
- School makes determination on case-by-case basis.



Exception: Health or safety emergency (cont.)

- Department will not substitute its judgment if there is a rational basis for decision to disclose under health or safety emergency exception.
- Limited to period of time of the emergency.
- Must record pertinent information when it discloses PII.



Pop quiz: Judicial order or subpoena

 Does FERPA require schools to disclose information from education records pursuant to a judicial order or subpoena?

Yes

No





Exception: Judicial orders & subpoenas

- School <u>may</u> disclose PII from education records necessary to comply with a judicial order or lawfully issued subpoena.
- School must make a reasonable effort to notify the parent or eligible student of the order or subpoena before complying with it in order to allow parent or eligible student opportunity to seek protective action.
- Some judicial orders and subpoenas are exempt from FERPA's notification requirement.



Uninterrupted Scholars Act

Exception to the general consent rule passed by Congress January, 2013, P.L. 112-278.

- Disclosure permitted to: "agency caseworker or other representative" of a state or local child welfare agency (CWA) or tribal organization who has the right to access a student's case plan.
- Disclosure permitted when: the CWA or tribal organization is "legally responsible ... for the care and protection of the student."

Exception: Audit or evaluation

- Federal, state, and local officials listed under § 99.31(a)(3), or their authorized representative, may have access to education records only:
 - in connection with an audit or evaluation of federally- or state-supported education programs, or
 - for the enforcement of or compliance with federal legal requirements which relate to those programs.
- The information must be:
 - protected in a manner that does not permit disclosure of PII to anyone; and
 - destroyed when no longer needed for the purposes listed above.



Who is an authorized representative?

Any entity or individual designated by a state or local educational authority or an agency headed by an official listed in § 99.31(a)(3) to conduct – with respect to federal- or state-supported *education* programs – any audit or evaluation, or any compliance or enforcement activity in connection with federal legal requirements that relate to these programs.



What is an education program?

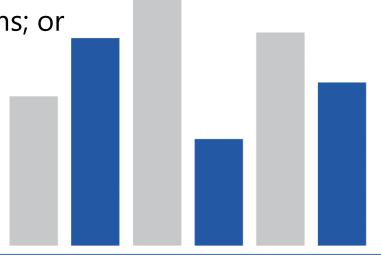
- Any program principally engaged in the provision of education, including, but not limited to, early childhood education, elementary and secondary education, postsecondary education, special education, job training, career and technical education, and adult education; and
- Any program that is administered by an educational agency or institution.





Studies exception

- Studies conducted "for or on behalf of" schools, school districts, or postsecondary institutions.
- Studies must be for the purpose of:
 - Developing, validating, or administering predictive tests;
 or
 - Administering student aid programs; or
 - Improving instruction.







What are written agreements?

- Mandatory for any LEA or SEA disclosing PII without consent under audit/evaluation.
- Mandatory for school or LEA for disclosing to outside organization under the studies exception, or for SEA redisclosing for, or on behalf of, school or LEA.



CONFIDENTIAL

Written agreements – best practices

"FERPA represents the floor for protecting privacy, not the ceiling."

- Bind individuals to the agreement
- Specify points of contact/data custodians
- Mention Institutional Review Board review and approval
- State ownership of PII



Written agreements – best practices (cont.)

- Identify penalties
- Include funding terms
- Maintain right to audit
- Identify and comply with all legal requirements
- Have plans to handle a data breach



Written agreements – best practices (cont.)

- Review and approve reported results
- Define terms for conflict resolution
- Specify modification and termination procedures
- Inform the public about written agreements
 - In some cases, a separate confidential IT Security
 Plan may be appropriate



What to do if your representative violates a written agreement

- Look to the terms of the agreement in addition to ED enforcement
 - Contract remedies can be more flexible
- Contact the us: <u>privacyTA@ed.gov</u>



FERPA test

- FERPA only applies to schools that receive federal education funds.
- T F
- 2. Once a student turns 18, the school can't share education records with the parents.
- T F
- 3. If a child is living with a grandparent who is responsible for the day-to-day care of the child, the school must provide the grandparent with access to the child's education records.
- 4. Student health records maintained by the school nurse are not education records.
- T (F
- 5. FERPA permits a parent to file a lawsuit against a school, district, or school board for violating his or her rights under FERPA.



FERPA test (cont.)

- Schools are required to provide parents with a copy of their child's education records upon request.
- T F
- 7. Can a school disclose student information that has T F previously been designated as directory information without prior written consent?
- 8. If a parent discusses a matter about his or her child in an open school board meeting, that constitutes "consent" under FERPA for school board members or other school officials to respond by disclosing PII from the child's education records.





FERPA pre-test (cont.)

- 9. Having a data-sharing agreement with an outside vendor is sufficient for a school to disclose PII from education records to a vendor without consent of parents or eligible students.
- 10. When a student under 18 transfers from School District A to School District B, District A can share all of the student's education records with District B without the consent of the parent, including disciplinary records and special education records.





FERPA 201





Scenario 1: "More, please!"

- Cani Handleit, the Three Spoons School District secretary has just been notified by the state Office of Public Instruction (OPI) that the state will be adding a new element to next fall's enrollment data collection an indicator for each student of whether he/she has a parent or guardian that is on active military duty. Ms. Handleit is pretty sure that nothing like this is currently collected at any of the three elementary schools or the high school, at least she hadn't noticed it on any of the schools' enrollment forms. Usually she would have just passed the information on to the district tech coordinator, but he had a hip replacement and is on leave for the remainder of the school year and there are rumors he may retire!
- Ms. Handleit decides to just let the secretaries at each of the school building know so that they and be sure to add it to next fall's enrollment forms.



Scenario 1

- Has this ever happened to your district?
- What was your reaction to the plan to accommodate the new element?
- What would you do different?
- Does your organization have a process to accommodate these types of requests?



Scenario 2: "Let your fingers do the walking..."

• The Common Falls School District staff is proud of the progress they've made over the past two years to implement a new student information system (SIS). It's been a big effort, but now both elementary schools and the high school are live on the SmartKidsRUs SIS. One of the things they are most excited about is all the reports they now have available. Ima Techy, who is the art teacher at one of the high schools and also helps out with transportation coordination for the district, has been experimenting with some of the report filters and is amazed that she can drill down to all the students in the entire district, and can see who their students in the entire district, and can see who their teachers are, and what classes are on their schedules!
This will be a big benefit when she has to help schedule bus routes for next year.



Scenario 2: "Let your fingers do the walking..."

 One day Ima gets a call from Bill Melater, an assistant principal in one of the neighboring districts – they had met at the "Emerging Educational Practices" course she took over the summer. Bill explains that he is working on his doctorate and needs some data for his dissertation. Ima can easily download the data from those reports in the new SmartKidsRUs SIS!



Scenario 2: "Let your fingers do the walking..."

- Should she do it?
- What risks are involved with type of disclosure?
- Is there an avenue to provide this information legitimately? (other FERPA Exception?)
- What guides your staff when faced with this type of situation? Policies, processes, training?



Scenario 3 – Divorced Parents

Jack and Diane, two young people from a small town in Iowa, fall in love and get married. After 10 years, and two kids, they grow apart and get divorced. Jack moves to California and Diane stays in her small town, gets remarried and has sole custody of the kids.

Concerned about how his children are doing, Jack asks for access to his children's education records. Knowing that he doesn't live with his children the school denies the request. Did the school do the right thing?









Scenario 3 – Divorced Parents

This is one of the most common parent issues received on the PTAC helpdesk

- Divorce/Custody Issues are hard
 - Schools are often caught in the middle.
 - FERPA affords rights to both the custodial and noncustodial parent
- Important to differentiate between "Access to Records (FERPA)" and "Right to Make an Educational Decision or check the kid out of school (Not FERPA)"



Scenario 4 – School Employee

Mary is a Database administrator for the school district. Part of her job requires doing system updates for the Student Information system, as such she has full administrative access to the SIS. Her sister Beth's administrative access to the SIS. Her sister Beth's children all go to the school district. Recently, her nephew gets into a fight and winds up getting suspended. Her nephew refuses to talk about the incident and won't tell his parents who he got into a fight with. Frustrated, Beth calls Mary and asks her to look up in the system to see if she can find out who the fight was with. Mary goes into the SIS and finds the discipline incident report for the fight and lets Beth know the name of the child her nephew had fought with. Beth then calls that child's parents up to discuss the incident. Is what Mary did ok?



Scenario 5 – Dual Enrollment

Janet is a 17 year old high school student at your school and is enrolled in the career and technical education Culinary Arts Program of Study. The Culinary Arts Program has an articulation agreement with local community college. As such, Janet also is dually-enrolled at the community college where she is taking the Artisan Breads and Pastries class. Janet's parents have requested access to and a copy of Janet's education records maintained at both your school and the community college.



Explaining Dual Enrollment

The fun and "easy" way to work through this problem

Keep in mind what records are kept at which school or institution!



- Determine who has rights to access at each of the schools or institutions
 - Parents **MAY** have access to records kept at the college if:
 - Janet signs a consent form or;
 - Janet is claimed as a dependent
 - Parents *have the right* to access records kept by the high school!



Are records shared between the institutions? If so, where those records are maintained will provide your answer on who has access.





Scenario 6 – Deceased Students

The local newspaper is conducting research for a feature article on the increase in student suicides in the local community. The reporter approaches you with a list of student suicides over the past 5 years and requests academic and mental health records of the students.



Scenario 6 - Continued

- 1. May you disclose the requested information to the reporter as the students are deceased?
- 2. Would you need to obtain consent from the parents of the students?
- 3. Would the age of the student at the time of death make a difference in whether you may share the information with the reporter?



Scenario 7 – Cyber School

Your district provides parents the option of enrolling their child in an online cyber public charter school. The district uses a third party to run the online school. The third party also has arrangements with other subcontractors to assist in running the school. In order for a parent to enroll their child in the cyber school, the parent must agree to the third party's Terms of Service which permits the third party to use, reproduce, or distribute for any purpose the information it maintains on its students.



Scenario 7 Continued

- 1. Can the district require a parent to agree to the terms of service of the cyber school in order to enroll their child in the school?
- 2. Does the fact that the cyber school is an option for parents and their children make a difference in whether they must agree to the terms of service before enrolling
- 3. Are cyber schools subject to FERPA?



Scenario 8 – Community Based Organization

A community-based organization that has programs for children with special needs approaches you regarding their programs and asks for the name, address, and telephone number of parents with students in your school who have a disability in order to contact parents regarding their programs. You like the programs offered by the organization and believe the programs may be of benefit to the students with disabilities in your school and their parents.

Can the names and contact information for these students be disclosed to the organization?



Scenario 9 – Parent Volunteer

Mr. Spencer is a parent volunteer in your resource classroom for students with learning disabilities. He also has a child with a disability enrolled in the school, but not in your class. Mr. Spencer's assignment is to work with a small group of students on math skills. You provide him with the math achievement scores, classroom test reports and other math related information from the special education records of each individual student he is assisting.

Is it permissible for you to share the individual math test scores and other related information with Mr. Spencer without the consent or knowledge of the parents of the students?



Scenario 10 – Official Transcript

Sam is a recent graduate of your high school. After his graduation he comes to the main office and requests a copy of his official transcript. You notice that he owes several hundred dollars in unpaid fees and refuse him access. He states that refusal to honor his request is a FERPA violation. What do you do?



Scenario 11 – After School Program

A number of your students belong to the local Boys and Girls club operated out of a local rec center. After school the students take a private bus there where they play games and get tutoring and homework help until their parents get off of work.

The Boys and Girls club come to you and ask for student achievement data on the students that are in their program. They say this data is needed to help them judge whether this tutoring is making a difference. Can you share the data with them?



Scenario 12 – Data Requests

 Local press contacts a program area contact within your agency to request a set of data on English Language Learners. The program area person tries to be responsive and pulls together an aggregate data set that they already had access to. It turns out that the data set wasn't finalized yet and hadn't gone through all the validation necessary. A news article is then released stating that your agency has had a significant increase in ELLs from last year, which isn't correct.



Scenario 12 – Data Requests

- Does your organization have an agency-wide process for handling data requests (including press) that leverages the data governance program?
- Do you know what we mean when we talk "data governance"?
- Who is the main point of contact for data requests in your organization? (Who is responsible for receiving and vetting data requests, ensuring staff receive training for all relevant program areas on the process to ensure fidelity of implementation.)



Considerations for the Enterprise

- How are you tracking directory opt-outs?
- Have you seen your directory policy?
- Have you verified that the only records you are releasing under the directory exception are a part of your directory policy?



Considerations for the Enterprise

- What is in your annual notice?
 - Does it cover what you are doing under this exception?
- How do you manage access control in your organization?
 - Just because someone may have access to the SIS does not mean they have legitimate educational interest.



Questions?



Time to Take a Break?





CONTACT INFORMATION

United States Department of Education, Privacy Technical Assistance Center



(855) 249-3072 (202) 260-3887



privacyTA@ed.gov



https://studentprivacy.ed.gov



(855) 249-3073



