A FERPA “TO DO” LIST

- Ensure that individuals who need to be familiar with the new FERPA have access to the appropriate resources and information.

- Update your annual FERPA notice and/or policy to ensure that your definition of “school official” is broad enough to include contractors, consultants, volunteers and other outside parties providing services and functions or otherwise acting for an agency or institution.

- Adopt model security language protecting student records and student-record information to include in agreements with third parties.

- Discuss how to treat student-dependents with regard to releasing student records and student-record information to parents (see, e.g., DOE’s Model Form for Disclosure to Parents of Dependent Students and Consent Form for Disclosure to Parents).

- Review and ensure that appropriate security measures are in place to protect access to student records and student-record information, including access by school officials.

- Review process for releasing de-identified student records and student-record information with records custodians and others. Ensure that they understand that information should not be released that may inadvertently reveal the identity of a student.

- Review how students’ social security numbers are used on campus and ensure appropriate use.

- Review existing protocols or develop new ones to address who makes decisions about when to contact appropriate persons (including parents) in a health and safety emergency.

- Develop appropriate methods for authenticating the identity of those requesting access to student records or student-record information.

- Review existing categories of directory information and discuss whether to add or remove any categories.

- If information is published concerning what records and record-information may be sent to an institution to which a student seeks to apply or transfer, ensure that this information contains a statement informing students of the broad category of information that may be shared with the other school.