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# Establishing A GLOBAL FERPA DIRECTORY INFORMATION DEFINITION IN CTCLINK

## Background and Purpose

### What is FERPA directory information?

Family Education Rights and Privacy Act (FERPA) directory information is information contained within a student’s education record that, if disclosed, would not generally be considered harmful or an invasion of privacy. Directory information may be released without the student’s explicit consent. For example, FERPA directory information may be disclosed under a public records request unless the student has asked for a FERPA block. Another example would be commencement programs that contain the graduating student’s name and credential earned.[[1]](#footnote-1)

As defined by the federal regulation, directory information may include the student's name; address; telephone listing; electronic mail address; photograph; date and place of birth; major field of study; grade level; enrollment status (e.g., undergraduate or graduate, full-time or part-time); dates of attendance; participation in officially recognized activities and sports; weight and height of members of athletic teams; degrees, honors, and awards received; and the most recent educational agency or institution attended.

The purpose of defining the FERPA directory information is to explicitly establish what student-related data may be shared without first obtaining the student’s consent. Students are given the opportunity to exclude themselves from any public disclosure of this information by indicating a FERPA block. Information not included in the directory information definition may be disclosed only with the student’s written consent.

### Why is a global definition for directory information important?

A single definition of directory information is important as ctcLink is implemented across the community and technical college system. ctcLink allows only one person record for each individual. This one record is shared across all colleges in the system. To allow students the ability to block their directory information from disclosure in Student Self-Service, the Data Governance Committee recommends colleges adopt into policy a single definition of directory information

Currently, FERPA directory information is defined through policy on an individual college basis, the result of which is a wide variety of definitions across the system.

The goal of this proposal is to implement a system-wide policy defining FERPA directory information. Once globally defined, the FERPA functionality within the ctcLink Campus Solutions pillar may be implemented systematically. This proposal governs information that is provided publically and is not meant to impact internal business processes or analysis.

Standardizing the directory information definition will also assist in the effort of classifying all data within ctcLink, in compliance with the Washington State Office of Chief Information Officer (OCIO) data classification policy.

### Who was involved in developing this proposal?

In April 2018, the Data Governance Committee solicited volunteers for a working group to discuss the feasibility of designating a standard set of directory information across the system. The request for participation was sent to each of the seven commissions and forwarded to many of the councils.

The working group consisted primarily of college registrars, as this position is typically the key holder for FERPA directory information. The working group also included financial aid, information technology, research, finance, and human resources representatives. Appendix A lists the working group members.

### What were the guiding principles used by the working group?

1. Personal privacy: If the information is not needed for a critical process, err on the side of personal privacy.
2. What common data points did all colleges already agree upon or could easily agree upon?

* Examples: Common data points included: Student’s name, Major field of study, Enrollment status, and Dates of attendance

1. What is the risk if this information is misused?

* Examples: High risk data includes the following: Address, Telephone listing, Electronic mail address, Photograph, Date and place of birth

1. Who benefits? Does the student, the college, or somebody else benefit from sharing the information? The individual whose information is being shared should receive benefit.

* Examples: A student may benefit from sharing the following information: Participation in recognized sports, Degrees, Honors
* Examples: There is no perceived benefit from sharing the following information: Grade level, Weight and height of members of athletic teams, the most recent educational agency or institution attended

1. What is reasonable? Would requiring the student’s consent cause an undue burden to the college?

## Proposed Definition of FERPA Directory Information

### What is the proposal?

The working group considered the following options:

1. Designate a common list of directory information for the system.
2. Propose that no information is considered directory information, which follows the lead of other colleges in the country.
3. Propose that no changes be made, and colleges should continue to define directory information in their local policies.

The working group met several times. First, the group concluded it ideal to implement a standard FERPA directory information definition. Second, members agreed upon the following categories of FERPA directory information to serve as a global definition proposal:

* Student’s name
* Major field of study
* Enrollment status
* Dates of attendance
* Participation in recognized sports
* Degrees
* Honors

More detail about the precise data elements in ctcLink that fit under each of these categories may be found in the next section.

The working group proposed the new definition to the Admissions and Registration Council (ARC), which voted unanimously to pursue the system-wide implementation of the new definition.

In addition to the global FERPA directory information definition, the working group recommends the following proposals:

* Students will be provided a single option to block all directory information instead of allowing the student to select individual categories. This will be done within the ctcLink Student Self-Service area where a student will be provided a single check box to block directory information from public disclosure.
* A FERPA block flag will be added to all custom queries in ctcLink that contain the student’s name or social security number to indicate if the student has requested a FERPA block.

### What data elements in ctcLink are associated with these proposed categories?

ctcLink Campus Solutions records and data elements associated to each of the proposed FERPA directory categories are listed below.

* Student’s Name

Record name: VCS\_BIO\_PRIORTY

Field Name:

* + NAME\_PREFIX (Mrs., Ms., Mr., etc.)
  + NAME (full name)
  + FIRST\_NAME
  + MIDDLE\_NAME
  + LAST\_NAME
  + NAME\_SUFFIX (Sr., Jr., III, etc.)
  + **Where FERPA\_BLOCK = N**
* Major Field of Study

Record name: ACAD\_PLAN

Field Name: DESCR

* Enrollment Status

Record name: STDNT\_CAR\_TERM

Field Name: ACADEMIC\_LOAD

* Dates of Attendance

Record name: STDNT\_ENRL and TERM\_TBL

Field Name:

* + Based on the STRM field in the STDNT\_ENRL table:
    - TERM\_BEGIN\_DT
    - TERM\_END\_DT
* Participation in recognized sports (not recognized activities)

Record name: EXTR\_ACTVTY\_TBL

Field Name:

* + DESCR
  + **Where EXTRA\_ACTVTY\_TYPE = ATHL**
* Degrees

Record name: ACAD\_DEGR and ACAD\_DEGR\_PLAN and ACAD\_PLAN\_TBL

Field Name:

* + ACAD\_DEGR record DEGREE field
  + ACAD\_DEGR\_PLAN record ACAD\_PLAN field
  + ACAD\_PLAN\_TBL record TRNSCR\_DESCR field
* Honors

Record name: HONOR\_AWARD\_CS and ACAD\_DEGR\_HONS

Field Name:

* + HONOR\_AWARD\_CS record DESCRFORMAL field
  + ACAD\_DEGR\_HONS table DESCR field

### Why were some categories excluded from the proposed listing?

#### Student’s identification number (EMPLID)

The student’s ID number is not personally identifiable without being paired with the student’s name.

#### Photos

The working group agreed that, in this context, the term “photo” represents individual student photos such as a Student ID. The working group agreed that including the student photo as directory information conflicts with the guiding principle of maintaining personal privacy. Currently only seven colleges (22 percent) include photos as directory information. Per the Department of Education, a photo or video should not be considered directly related to a student unless the photo or video:

* will be used for disciplinary action
* contains the depiction of an activity that resulted in the college’s use for disciplinary action; shows the student in violation of the law; or shows the student getting injured, attacked, victimized, ill, or having a health emergency
* if the photo or video is intended to make the student the specific focus
* the audio or visual content otherwise contains personally identifiable information contained in the student’s education record

A photo or video is not considered directly related to a student if:

* the student’s image is incidental or captured only as part of the background
* a student is shown participating in school activities that are open to the public and without a specific focus on any individual.[[2]](#footnote-2)

### What is the process to finalize this proposal?

The proposal was shared with the Data Governance Committee in August 2019. The Data Governors are tasked with distributing the proposal to the system via their commission and councils and requesting their feedback. Any comments will be discussed by the committee, and, if needed, the working group will be reconvened to revise the proposal.

Once the proposal is deemed satisfactory, the Data Governance Committee will vote to approve or reject the proposal, taking into consideration commission and council feedback.

If the proposal is approved, the Data Governance Committee will forward to the ctcLink Governance Working Group any request for necessary modifications to the ctcLink system.

### How do we implement this proposal?

The Data Governance Committee extensively discussed the best way to implement a system-wide policy that would replace local college policies. The committee agreed to send the proposal to the Student Services and Research commissions for feedback. Once completed, most committee members agree the proposal should be taken WACTC for its consideration.

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1. The full text of FERPA may be found on the Electronic Code of Federal Regulations: <https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=34:1.1.1.1.33> [↑](#footnote-ref-1)
2. <https://studentprivacy.ed.gov/faq/faqs-photos-and-videos-under-ferpa> [↑](#footnote-ref-2)