



# Complying with FERPA

**An Ex Libris compliance document**



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## Introduction

FERPA (Family Education Rights and Privacy Act) is a United States federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.<sup>1</sup>

FERPA targets colleges and universities by prohibiting the disclosure of personally identifiable education information regardless of state, i.e. written records or electronic data. This includes information pertaining to financial aid records as well as grades. Furthermore, institutions require written permission from students to disclose such information to any other party.

According to FERPA, education agencies may disclose, without consent, "directory" information—defined as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them.

**None directory information is** considered to be the student's SSN, student identification number (only if it can be used to access the system), race, ethnicity and/or nationality, gender, transcripts as well as grade reports. FERPA allows institutions to disclose students "directory" information without prior approval; however patrons have the right to remove their record from the list.

## What does it mean for Alma to be compliant?

FERPA regulation covers a wide range of situations in which access to student's records is required by third parties. For each situation it instructs the terms and conditions under which such access is permitted, including the education agency (institutions) liability and processes to ensure privacy of students' data.

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<sup>1</sup> <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

The FERPA guidelines apply to data that is stored both on-premise and in the cloud, and require institutions to maintain adequate access controls to ensure that student records are not exposed.

The below table lists the FERPA requirements that are applicable for Alma:

FERPA	Alma Compliance
<p>"An educational agency or institution must use reasonable methods to ensure that school officials <b>obtain access to only those education records</b> in which they have legitimate educational interests. An educational agency or institution that does not use physical or technological access controls <b>must ensure that its administrative policy for controlling access</b> to education records is effective and that it remains in compliance with the legitimate educational interest 14 requirement in paragraph (a)(1)(i)(A) of this section." FERPA §99.31 B(ii)</p>	<p>Alma provides multi-tier access control that is based on security industry best practices. Access to Alma consists of:</p> <ul style="list-style-type: none"> <li>• Staff member authentication prior access to Alma</li> <li>• Each staff has privileges and access to data according to his/her role</li> <li>• Only authorized staff member can get access to patron data view and edit</li> <li>• Alma's browser session are encrypted using SSL</li> <li>• Patrons' personal information such as email, phone, address etc. are kept securely and encrypted in Alma.</li> </ul>
<p>"(a) The parent or eligible student shall <b>provide a signed and dated written consent before an educational agency or institution discloses personally identifiable</b> information from the student's education records, except as provided in § 99.31." FERPA §99.30(a).</p>	<p>Alma maintains an audit trail of access to patron data that has been exported out of Alma. This may be used in conjunction with the institutions' written approvals by students and/or their parents to track any export of patron's data outside of Alma system.</p>

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