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A proposal for Training and Evaluation of The Family Educational Rights and Privacy Act (FERPA) at the Iowa State University for University Employees and Staff of Research Experiences for undergrad (REU) Programs

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A proposal for Training and Evaluation of The Family Educational Rights and Privacy Act (FERPA) at the Iowa State University for University Employees and Staff of Research Experiences for undergrad (REU) Programs.

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To the professors who were patient while this paper was completed, you are the real

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Abstract

The Family Educational Rights and Privacy Act (FERPA) is a piece of legislation that affects all institutions of learning in the United States. Universities and programs run under the banner of universities are exceptionally susceptible to running afoul of FERPA regulations due to the clarity of the regulations and the large teaching and non-teaching staff that they contain. It is therefore important that all staff members who come into contact with student data should be trained in the proper methods of handling, storing and distributing such data according to relevant regulations. In this paper we propose the style of training to be used in conducting FERPA training among Iowa State University staff and the staff of the extra-curricular programs running within the university. We also propose the relevant use of the Kirkpatrick Model for evaluating not just the knowledge acquired but also the effectiveness of the training being done. We believe if these methods are implemented there will be a greater awareness among persons involved in student data management of the best practices for handling such data.

Contents

Introduction

The Family Educational Rights and Privacy Act (FERPA) is a United States federal law that was enacted in 1974 to protect the privacy of parents, students and their education records. According to the U.S. Department of Education, there have been nine amendments to FERPA legislation from the time of its enactment to the year 2001. The latest version is the basis for our study.

It is mandated in the United States that all educational institutions that receive federal funding must comply with the regulations stated in FERPA.

FERPA requires school and local education agencies to produce written policies that are accessible on the implementation of FERPA regulations within the institution (Protecting the Privacy of Student Education Records, 1997). At Iowa State University (ISU) this policy is published by the Office of the Registrar at the Enrollment Services Center and is available for public scrutiny on the Registrar's website (https://www.registrar.iastate.edu/policies) and the ISU Faculty and Staff guideline document.

According to the ISU Faculty and Staff guideline, faculty or staff members have a legal responsibility under FERPA to protect the confidentiality of student education records in their possession. All student records are considered to be confidential and may not be released without their expressed permission verified by required paperwork. These records include but are not limited to Social Security Number (SSN) (full or partial),

University ID (UID) number, student schedules, race, ethnicity, nationality, sex and gender, UID pictures, personal information, enrollment records, students' exams or papers, grades, disciplinary files, financial aid information and student employment records. Faculty and staff accessing and storing confidential information in unsecure locations (e.g., flash drives, public or home computers, etc.) creates the risk of unauthorized access to protected education records.

FERPA gives a student of ISU these rights that we broadly define:

- The right to inspect and review the student's education records within 45 days of the day the University receives a request for access.
- The right to request the amendment of the student's education records that the student believes are inaccurate, misleading or otherwise in violation of the student's privacy rights under FERPA.
- The right to consent to disclosures of personally identifiable information (PII) contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent.
- The right to obtain a copy of the institution's policy.
- The right to file a complaint with the U.S. Department of Education concerning alleged failures by the University to comply with the requirements of FERPA.

If a student has evidence of or suspects that these rights are being violated, they can file complaints with the U.S. Department of Education Family Policy Compliance Office.

There are situations where ISU may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. These are according to the Office of the Registrar

- Information the University has designated as directory or public information

- University employees who have a legitimate need to know

- Persons who need to know in cases of health and safety emergencies

- Appropriate parties in connection with financial aid to a student

- Individuals who have lawfully obtained court orders or subpoenas

- Accrediting organizations to carry out accrediting functions

- Organizations conducting educational studies for the University

- Other schools to which a student is applying, transferring or intending to enroll or where the student is already enrolled if the disclosure is for purposes related to application, enrollment or transfer

- Courts during litigation between the University and the student or parent

- Victim of crime of violence after final results of a disciplinary hearing

- Public after disciplinary proceedings determine student committed crime of violence

- Parents of dependent students as defined by the Internal Revenue Code

- Parents of a student regarding violation of any federal, state, local law, or policy of the school governing the use or possession of alcohol or a controlled substance

if it is determined that the student committed a disciplinary violation and the student is under the age of 21

- Federal, state and local governmental officials for purposes authorized by law. (Note: These entities may make further disclosures of personal identifiable information to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf.)

Purpose

The purpose of this paper it to evaluate and propose a method for Training and Assessment of Iowa State University Faculty and Staff on The Family Educational Rights and Privacy Act (FERPA).

Motivation

The Carnegie Classification of Institutions of Higher Education lists universities that grant at least 20 research/scholarship doctoral degrees per year as Research 1 (R1) universities. Iowa State University is one of such schools which is considered to have the highest output of research activity. It is only fitting that Iowa State University (ISU) would be a part of initiatives that would seek to encourage as much students of the institution as possible to engage in research activity. One such initiative is the National Science Foundation (NSF) Louis Stokes Alliances for Minority Participation (LSAMP) supported, Iowa Illinois Nebraska STEM Partnership for Innovation in Research and

Education (IINSPIRE) program. According to the program website the aim of this program is "to broaden the participation of underrepresented minorities in science, technology, engineering, and mathematics (STEM) education in the Midwest."

The participating schools are:

- Augustana College

- Des Moines Area Community College

- Doane University

- Eastern Iowa Community College District

- Grinnell College

- Hawkeye Community College

- Iowa State University (ISU)

- Iowa Valley Community College District

- Kirkwood Community College

- Little Priest Tribal College

- Luther College

- Nebraska Wesleyan University

- University of Iowa

- University of Northern Iowa

- Upper Iowa University

- Wartburg College

At ISU the IINSPIRE program endeavors to provide Research Experiences for undergrads (REU). To do create such opportunities, IINSPIRE collaborates with the ISU Research Program and various private companies. This paper focuses on the research programs within ISU.

Research Partners

Student participants of the IINSPIRE program have the opportunity to participate in research projects put on by many partners, many of them part of the University.

Some of the partners are

- Ames Laboratory Science Undergraduate Laboratory Internship (SULI)
- Biological Materials and Processes Research Experience (BioMaP)
- College of Agriculture & Life Sciences George Washington Carver Internship
- Engineering Research Center for Bio-renewable Chemicals (CBiRC)
- Interdisciplinary Research and Education - Emerging Interface Technologies (SPIRE-EIT)
- Microscale Sensing Actuation and Imaging (MoSAIc)

As with any educational program, participant data is to be recorded and maintained for reasons that vary from program evaluation to monitoring of outcomes. Therefore, the participants of the IINSPIRE program are protected by the FERPA regulations. One of the motivating factors for this paper, is the concerns of the program manager of

IINSPIRE at ISU is whether adequate training is being provided to the Staff of the program.

Importance to Institution, Students and Parents/Guardians

Universities for their own purposes keep records of current, prospective and past students. These include their education, interaction and extracurricular participation records. The U.S. Department of Education states in their 2019 document 'Legislative History of Major FERPA Provisions' that "each educational agency or institution is required to maintain a record, kept with the education records of each student, indicating all individuals, agencies, or organizations that have requested or obtained access to a student's education records and indicating specifically the legitimate interest that each has in obtaining the information. The record of access is available only to parents and school officials responsible for custody of records and auditing the system." This also excludes Staff/Faculty with legitimate reasons in the policy for accessing the records.

The 1994 amendment of FERPA added a clause to the legislation that parents/legal guardians of students under the age of 18 must be presented with an annual notice of their rights under FERPA (Nces.ed.gov, 1997).

Essex, N. (2004) lists the following as some common ways that Universities can be ensnared in litigation for violating FERPA rules.

1. When they do not inform parents, guardians, or eligible students of their rights under the act.

2. When they do not provide an opportunity for parents, guardians, or eligible students to inspect and challenge the accuracy of information contained in the student's file.

3. When confidential student files are viewed even though there is no legitimate educational interest involved.

4. When confidential information is shared with others who have no need to know.

5. When categorical statements are made that place a stigma on students.

6. When confidential files are not properly secured and safeguarded.

7. When confidential information is communicated to authorized persons or agencies based on opinion rather than fact.

8. When proper notice is not provided to parents, guardians, or eligible students concerning a court-ordered subpoena before records are released.

9. When school officials fail to inform third parties of the five-year penalty for disclosure of records without parental consent.

10. When school officials fail to inform faculty/staff of the law of libel and slander involving student records.

These indicate that faculty, staff and other program managers associated with ISU should be properly trained as to know and avoid the potential legal and other ramifications that could ensue from not adhering to FERPA principles.

Training

"Training Effectiveness is defined as a measurement of observable changes in knowledge, skills and attitude after training has been conducted" (Bramley, 1996 as cited by Mollahoseini and Farjad, 2012).

Any training that is done should seek to include content covering as much as possible, the different ways that a person learns. One of the most accepted explanations and classifications of a human learning theory came from a 1971 paper by David A. Kolb entitled 'Individual learning styles and the learning process.' From this paper four learning style types were proposed: Accommodating, Assimilating, Converging and Diverging (Kolb, 2013). These four styles have become since then a standard model for delivering adult education and are a keystone of Kolb's experiential learning theory.

The four styles were revisited by Kolb in the 2013 whitepaper, 'The Kolb Learning Style Inventory 4.0' and further refined into nine learning styles: Initiating, Experiencing, Imagining, Reflecting, Analyzing, Thinking, Deciding, Acting and Balancing. It is these nine styles we propose to employ in the designing of new FERPA training materials for the use of Iowa State University.

Kolb's Styles (2013)

- "The Initiating style is characterized by the ability to initiate action in order to deal with experiences and situations" (14).

- "The Experiencing style is characterized by the ability to find meaning from deep involvement in experience" (14).

- "The Imagining style is characterized by the ability to imagine possibilities by observing and reflecting on experiences" (15).

- "The Reflecting style is characterized by the ability to connect experience and ideas through sustained reflection" (15).

- "The Analyzing style is characterized by the ability to integrate and systematize ideas through reflection" (15).

- "The Thinking style is characterized by the capacity for disciplined involvement in abstract and logical reasoning" (15).

- "The Deciding style is characterized by the ability to use theories and models to decide on problem solutions and courses of action" (15).

- "The Acting style is characterized by a strong motivation for goal directed action that integrates people and tasks" (15).

- "The Balancing style is characterized by the ability to adapt; weighing the pros and cons of acting versus reflecting and experiencing versus thinking" (15).

It is important to note that Kolb intends that a person's learning style is not fixed but a dynamic, flexible mishmash of all the above styles constantly evolving with one's experiences and choices. (Passarelli, 2011)

Passarelli also proposes that in a learning session, a person may move into the learning style that they most identify with at the time. Considering this, training material should

contain materials capable of engaging any and all potential styles. Therefore, we propose that the training be completed in person, preferably with a legal expert on FERPA leading the sessions. We also propose that the presenter/ the designers of the training material should employ the use of both Case and Problem based material. Just as an individual possesses all learning styles at varying levels, so do both training methods engage all styles at different levels. The levels of each style related to may also change based on the individual interacting with the material.

Problem-based material

Savin-Baden in 2004 defined Problem-based learning as the using of "problem scenarios to encourage students to engage themselves in the learning process". Even though the learner is not themselves in the situation at the current time, they are forced to envision themselves in the situation and think through possible solutions. "One of the primary features of problem-based learning is that it enables students to question the nature of a problem and consider how it might best be investigated" (Savin-Baden, 2004). The problem is answered with a statement of a possible course of action to be taken to arrive at the solution.

Case-based material

"Case-based reasoning means reasoning based on remembering previous experiences. A reasoner using old experiences (cases) might use those cases to suggest solutions to problems, to point out potential problems with a solution being computed, to interpret a new situation and make predictions about what might happen, or to create arguments justifying some conclusion. A case-based reasoner solves new problems by remembering old situations and adapting their solutions. It interprets new situations by remembering old similar situations and comparing and contrasting the new one to old ones to see where it fits best. Case-based reasoning is a method that combines reasoning with learning. It spans the whole reasoning cycle. A situation is experienced. Old situations are used to understand it. Old situations are used to solve its problem (if there is one to be solved). Then the new situation is inserted into memory alongside the cases it used for reasoning to be used another time."(Kolodner, 1993)

Justification

Both methods seek to engage all the learning styles of the individual. Problem-based materials however seem to more strongly promote the thinking, decision making and acting on initiating what is being assimilated. Case-based material seem more closely

tied in with imagining what is possible by reflecting on experiences, to provide analysis of situations. Both methods together allow a balance to be created, thus a well-rounded training session.

Implementing this can be achieved by presenting staff with problems of possible situations (relating to the enforcement of FERPA regulations) in video or text form and collecting possible reactions. These reactions could be presented in a multiple choice or multiple select format that will allow a reaction of the training system if unsuitable reactions are selected.
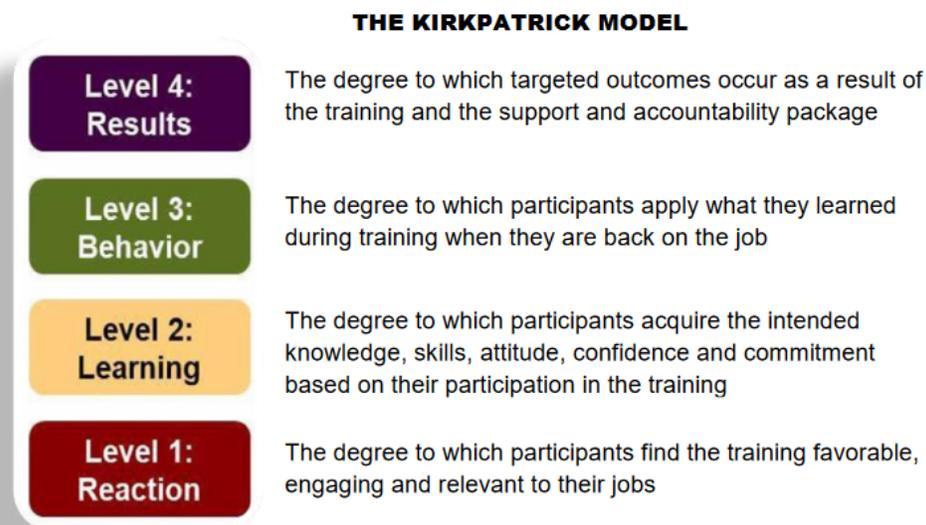
Evaluation

"Have you succeeded in transferring the knowledge to your participants so that they not only know what FERPA is about but can actually use what they've learned in their professional lives on campus?" (Rainsberger, 2016)

Papers like this one are usually only developed when there is a potential difference between how a task is currently done (or not done) and how it can be done better (or start being done). In the case of FERPA, we believe that since the university is required to provide some level of training to its employees, there is always a current level to be improved. Current training methods can always be made better, but they must first be evaluated for their effectiveness. Are the current training methods (or the one we proposed after its implementation) providing the desired outcome? When evaluating it

is important that participants be informed that there are to be no repercussions to their answers while being a part of the evaluation, but results monitored are for the betterment of the whole community. We hereby propose that such an evaluation of the training can be implemented using the New World Kirkpatrick Model.

Kirkpatrick Model

The Kirkpatrick Model of training evaluation criteria is one of the most popular standards for evaluating training programs not only in education but in any sector where training is done. The model was presented in 1959 by Donald L. Kirkpatrick while a PhD student at the University of Wisconsin in Madison. His Model presents four levels for training evaluation, reaction, learning, behavior and results.

THE KIRKPATRICK MODEL

Level 4: Results — The degree to which targeted outcomes occur as a result of the training and the support and accountability package

Level 3: Behavior — The degree to which participants apply what they learned during training when they are back on the job

Level 2: Learning — The degree to which participants acquire the intended knowledge, skills, attitude, confidence and commitment based on their participation in the training

Level 1: Reaction — The degree to which participants find the training favorable, engaging and relevant to their jobs

(Kirkpatrick and Kirkpatrick, 2019)

Applying the model to FERPA training.

Level 1: Reaction

Even though FERPA training is required of all staff members who interact with student data, the reaction from staff should be measured to ensure that they are satisfied with the level of training that they have received. Reaction also endeavors to measure staff engagement with the content of the training (how useful does it seem to them) and also how relevant they believe it to be to their job positions. Training administrators must ask themselves if they are supplying the right training to the right persons.

Level 2: Learning

The Learning level can be described as how much of the content on the principles of FERPA intended for the participant to learn was acquired. In other words, have they attained the knowledge and skill needed for applying the principles to their work flow? Do the participants see the training as worthwhile? Are they confident that they are ready to put into practice the training? Are they committed to applying the knowledge and skills attained?

Level 3: Behavior

Monitoring behaviors looks for application and consistency. Are the staff consistently applying the FERPA principles in their jobs?

Level 4: Results

Are there signals showing through the entire body of staff trained that the training has had its desired results? Unfortunately, the true indicators of this may not seem to appear until a rule is broken and there are complaints from students and/or parents that their FERPA rights have been violated.

Evaluation Material

Level 1: Reaction

Trainees' reaction to the training sessions can be evaluated using reaction sheets, focus groups or interviews after some time has passed. This will help administrators to gage participant reactions to the relevance, training methods, trainers, qualifications and assessment methods used in the training. We believe that this evaluation be conducted at least twice in a training cycle (usually one school year). One time on the immediate completion of the training session, given to all participants (to gauge fresh participant perspective) and at least once after a period of about six months, given to a random sample of participants (to see if time has somewhat affected the attitudes of the trainees, now that they have had a chance to put this training into practice).

It is important that the participants not only be probed on their thoughts about the training and the method/s of, but also about them and how they experienced the

training event in relation to their needs. A four or five-point Likert scale is proposed for measurement with responses such as: strongly disagree, disagree, agree and strongly agree. These can be accrued to measure participants attitudes to the training sessions. Further Examples of questions and how they should be developed can be found in Appendix.2 (excerpts from Jim Kirkpatrick's "The New World Level 1 Reaction Sheets" white paper, 2016).

The analysis of these reaction sheets will provide administrators with an understanding of how training sessions can be better formatted to reach the targeted groups.

Level 2: Learning

Learning should be analyzed using a pre-training test and post-training test. We believe that the first three levels of Bloom's Taxonomy of Educational Objectives should be utilized for this purpose. These three levels are 'Knowledge (knowing basic facts, terms, concepts about FERPA), Comprehension (understanding what the basic facts, terms and concepts mean beyond just being familiar with those basic facts, terms and concepts) and Application (using the acquired knowledge of those basic facts, terms and concepts in a FERPA-compliant manner)'. (Rainsberger, 2016)

Rainsberger (2016) also suggests that a test include at least thirty questions with the questions divided in the ratio of 1(Level-One):2(Level-Two):3(Level-Three). Examples of these question by type types can be found in Appendix.2 (Excerpts from April and May, 2016 editions of 'The Campus Legal Advisor', articles named '*Adopt FERPA Basics*

training test questions for staff and work-study students' and 'Consider sample test questions for FERPA Basics training').

The pre-test can be administered to a random sample of university officials, this will allow the university's administrators a view into what areas of content or application training is most immediately needed. Both pre-test and post-test can be taken/provided through a digital medium (computerized testing), this format that allows easy analysis of the test results, allowing administrators near real-time insight into the areas of knowledge and application that need stronger focus in the training material. This type of test will also be able to provide question by question feedback to the test taker, providing an explanation as to why the selected answer/reaction is correct or not. It may also limit the test taker from moving to another question until the correct answer is selected.

 Such test would adequately examine that staff members have or have not acquired the knowledge and understanding of the material to be able to apply it as need be. On competition of the post test, an item analysis should then be performed on the test results. This will determine what and how well items were learnt and what wasn't; whether the test items discriminated between those who scored well and those who did not; and if the questions were either too difficult or too easy.' (Rainsberger, 2016) Since FERPA training is more about awareness and application rather than a collection of rules to be learnt, grading each test-taker on their performance is not necessary. A

record of which and how many times incorrect answers are selected may also deliver feedback on how to better structure training.

Level 3: Behavior

Behavior can be tested through randomized distribution of questionnaires, surveys and patterned interviews of trained staff. This should only be done after thorough analysis of Level 1 and Level 2 evaluation. Even though the behaviors are being self-reported in the stated methods above, weaknesses and strengths of the training and areas for further study and focus may emerge. These evaluations may be done at multiple intervals during one training cycle. We suggest that they be done at three-month intervals, again on random samples of university officials. This way, retention and compression of material can be evaluated and decisions can be made as to how to better structure future training sessions and even evaluate the effectiveness of the length of the training cycle. The questions can include Level 2 type questions, again focusing on Application type questions. This evaluation may not offer explanations for incorrect responses, since the evaluation is to collect snapshots of staff learning at different points of time. We believe that the formatting of those evaluations (whether questionnaires, surveys or interviews) at that time is best left up to the administrators, though different formats may be tried simultaneously and the results compared. A correct answer rate of less than 80% percent in 80% or more of respondents to be a serious cause for concern.

Level 4: Results

At Level 4, Evaluations seek to measure the levels that the application of knowledge and skills gained from the training has led to changes in performance at ISU. This may only be evaluated by the amount of breaches in FERPA regulations recognized and reported across campus. The amount and type of year over year reports should be kept (if not already being kept) and used as a baseline for future years. The impact the training has had will be measured by the reduction in the number and type of incidents. Those metrics can also be used in the planning of the next training cycle. Any number of cases higher than zero should show that there is room for improvement.

Reflections and Limitations of paper

Due to many constraints the writer is unable to produce actual instruments for training and evaluation but is optimistic that the production of these instruments of training and evaluation may be done as part of a future study. These Instruments when developed can be applied at the other schools engaged by the Iowa Illinois Nebraska STEM Partnership for Innovation in Research and Education (IINSPIRE) program or even other education institutions who wish to better acquaint their staff with FERPA guidelines. Having this uniform level of FERPA training will allow a more free interaction of faculty and students of the different schools within the limits of FERPA regulations.

Eventually there may be need for multiple formatted and staged, targeted training session to cater to different groups within the university, who have similar responsibilities (e.g. program directors vs. professors vs. teaching assistants etc.…). Though this will require extra preparation form the university's FERPA administrators, assistance can be sought for the information systems department of the Ivy Business School. Students may be able to work with the registrar's department as course projects.

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Appendix 1.
Excerpt from Jim Kirkpatrick's "The New World Level 1 Reaction Sheets" white paper, 2016).

	Strongly Agree	Agree	Disagree	Strongly Disagree
The program objectives were clearly defined.				
The material was the right level of complexity for my background.				
I understood the learning objectives.				
I was appropriately challenged by the material.				
The course materials complemented the course content.				
I found the course materials easy to navigate.				
I felt that the course materials will be essential for my success.				
The facilitator demonstrated a good understanding of the material.				
My learning was enhanced by the experiences shared by the facilitator.				
The facilitator used a good variety of instructional methods.				
I was well engaged during the session. It was easy for me to get actively involved during the session.				
I was comfortable with the pace of the program.				
The facilitator allowed for questions during the program.				
I was given ample opportunity to practice the skills I am asked to learn.				
I experienced minimal distractions during the session.				

Appendix 2.

Excerpts from April and May, 2016 editions of 'The Campus Legal Advisor', articles named *'Adopt FERPA Basics training test questions for staff and work-study students' and 'Consider sample test questions for FERPA Basics training'* by Richard Rainsberger Ph.D.

Level One (Knowledge) Terms

1. What term is used in the FERPA regulations to identify a particular student?
    a) date of birth
    b) personally identifiable
    c) biometric record
    d) classified
    e) non-redacted

2. What is the term that best describes who can have access to a student's education records?
    a) faculty
    b) academic staff
    c) nonsupport staff
    d) student personnel
    e) school officials

3. What term is used in the FERPA regulations to identify a document that is subject to FERPA?
    a) protected record
    b) educational record
    c) student record
    d) education record

4. A professional need to know is otherwise known as a:
    a) legitimate educational interest
    b) records courtesy
    c) student waiver
    d) disclosure

5. A school official can be:
    a) a professor
    b) the dean of the college
    c) maintenance staff
    d) a campus police officer
    e) all of the above

6. Student records that can be disclosed without the student's written consent are called:
    a) open documents
    b) directory information
    c) waived text
    d) safe scripts

Level Two (Understanding)

7. Which of the following is not required by FERPA?
    a) inform students of what items the college identifies as directory information
    b) permit students to inspect their education records with certain exceptions
    c) notify students annually of their FERPA rights
    d) let parents see their student's grades without the student's consent.

8. Which of the following can be directory information items? The student's:
    a) name
    b) email address
    c) gender
    d) date of birth
    e) race
    f) a, b, c and d
    g) c, d and e
    h) a, b and d

9. The student's right of nondisclosure refers to:
    a) restricting their nondirectory information to their parents
    b) deleting their name from published dean's/president's lists
    c) not releasing their directory information to anyone under any circumstances
    d) not disclosing any information about them until they approve

10. The fundamental rule of FERPA is that student records are disclosed only if:
    a) the college obtains the written consent of the student first
    b) the dean of the college authorizes the disclosure
    c) the parents sign a written waiver to disclose
    d) the student has not exercised her right of nondisclosure

11. According to the Family Policy Compliance Office, a student's FERPA rights begin:
    a) upon payment of her tuition
    b) upon acceptance to the college
    c) on the first day she attends classes unless the college specifies otherwise
    d) when the Admissions Office receives her application for admission

12. To be subject to FERPA, a student record must:
    a) be personally identifiable to a student, maintained by the institution, and not in one of the excluded-from-FERPA categories
    b) include a parent's name, which must be certified by the financial aid office
    c) be kept only in the registrar's office
    d) only be disclosed upon the student's written consent

13. Which of the following categories of records are not subject to FERPA:
    a) employment (non-work-study)
    b) medical treatment
    c) peer-graded exams prior to handing in to the instructor
    d) law enforcement unit records
    e) all of the above

Level 3 (Application)

14. You are responsible for FERPA on your campus. Therefore, FERPA requires you to do all of the following except:
    a) provide an annual notification of FERPA rights to students
    b) inform students of what the college identifies as directory information
    c) permit students to review their education records
    d) comply with any lawfully issued subpoena for education records you receive

15. It is a month before classes begin in the fall. A parent calls and would like you to provide any contact information (name, address, phone number; all is directory information) for any students living within 50 miles of his daughter. He says the purpose is to try to coordinate carpooling on vacations, etc. Which of the following statements is true based solely on the information provided above?
    a) You may provide the information since all of it is directory information
    b) You may provide the information since the student is on vacation during the summer
    c) You can't provide the information since it requires the student's written consent to release
    d) You can't provide the information since one of the students' records has been subpoenaed

16. Question 15 is a good example of:
    a) FERPA's concept of school officials/legitimate educational interest
    b) the "mays" and "musts" of FERPA
    c) FERPA's parental consent
    d) the student's right of nondisclosure under FERPA

17. One of your students asks you to write a letter of recommendation in support of his application to graduate school. In that letter, you can:
    a) include any grades/test scores the student achieved in your class
    b) state your professional opinion of the student's potential for graduate school
    c) supply any anecdotal evidence of your experiences with the student
    d) offer to be contacted by the admissions committee if there are questions
    e) all of the above
    f) b, c and d only

18. When returning graded exams in class, you can:
    a) have your work-study student return the exams to the other students without taking any precautions to prevent students from seeing other students' grades
    b) return them without taking any precautions if you have had all the students sign a waiver that this practice is permissible
    c) discuss all or parts of the exam once the exams have been returned to the students
    d) return them without taking any precautions since these exams are not subject to FERPA
    e) both a and d

f) both b and c

19. You find a printout of a student's course schedule on a desk in your classroom. You should:
    a) leave it where it is in case the student needs it
    b) pick it up and shred it
    c) give it to the Office of the Registrar
    d) think "green"; grab it and use the back side for scratch paper
    e) b or c

20. A parent calls you and wishes to discuss his son's work in your class. What is your most appropriate response?
    a) "I will be glad to discuss your son's work with you. What is a good time to come and see me?"
    b) "I am not permitted to discuss any of your son's work with you unless he is present."
    c) "I can only discuss his work in general terms and cannot provide you with any grades without your son's written consent."
    d) "The kid's a loser! Nothing is going to help him."

Answers: 1. b, 2. e, 3. d, 4. a, 5. e, 6. b, 7. d, 8. h, 9. b, 10. a, 11. c, 12. a, 13. e, 14. d, 15. a, 16. b, 17. f, 18. f, 19. e, 20. c