

FERPA Glossary

Directory Information

Under FERPA, the College has the discretion to designate specific student data as public information. This data is defined as “Directory Information” and may be disclosed *without the prior written consent of the student*. Following is a full listing of student data that the College defines as public information:

- Name
- Address (local/campus and home/permanent)
- E-mail address (institutional and personal)
- Telephone number (local/campus, home/permanent, and mobile)
- Major and Concentration fields of study
- Status (including current enrollment, dates of attendance, full or part time, withdrawn)
- Graduation information (including whether a degree was conferred and/or the degree and date it was conferred)
- Academic awards received (e.g., Dean’s List recognition)
- Photograph(s) and/or video footage
- Date and place of birth
- Participation in officially recognized activities and sports (including the weight and height of members of athletic teams)
- Most recent educational institution attended

Please note, the following student data is NOT considered Directory Information:

- Social Security Number
- Student ID #
- Race
- Gender
- Religion
- Country of citizenship
- Grades
- GPA

Twice a year, students are notified via email of the data defined by Grinnell as Directory Information and their right under FERPA to block the release of this information. If you wish to suppress the release of data that the institution defines as Directory Information, please submit a [Request to Block the Release of Directory Information](#).

Educational Record

An educational record is any record, with certain exceptions (see below), that 1) personally identifies and is directly related to a student or students and 2) is maintained by the institution. Records may be in any format or medium. Examples of educational records entitled to FERPA protections include but are not limited to:

- Grades
- Transcripts
- Course schedule
- Most conduct and disciplinary files
- Student account and financial aid information
- Student employment details

Under FERPA, certain records are NOT considered part of the educational record. They are:

- Sole Possession Notes (see below)
- Law enforcement unit records
- Health, medical, counseling, and treatment records
- Alumni records unrelated to the student's academic or student affairs records
- Employment records, unless the individual is employed as a result of their status as a student

Eligible Student

FERPA rights are granted to all students that are 18-years and older or who are in attendance at an institution of higher education, *regardless of their age*. Grinnell defines "in attendance" as being officially registered for a course and the course has begun. FERPA rights continue after the student leaves the institution.

Legitimate Educational Interest

Access to student data alone does not merit the retrieval, examination, or distribution of that data; a legitimate educational interest is required. Under FERPA, the College has the discretion to define what constitutes a legitimate educational interest. Grinnell defines it as follows: A Grinnell school official has a legitimate educational interest if that official requires access to an educational record in order to fulfill their professional duties and responsibilities.

Sole Possession Notes

Sole possession notes are made by one person as an individual observation or recollection and kept in the possession of the author. As long as these notes remain in the sole possession of the author, they are not considered part of the student's educational record. Once these notes are disclosed to another party (or placed in a physical or electronic location where another party could view them) they cease to qualify as sole possession notes and become a part of the student's educational record. Also, notes composed in conjunction with a student or in the physical presence of a student are not considered sole possession notes.

Parent

Defined under FERPA as including natural parents, a guardian, or an individual acting as a parent in the absence of a parent or a guardian.

Personally Identifiable Information (PII)

Data or information from which an individual student can be personally identified, including:

- Name of the student
- A personal identifier, such as Grinnell Student ID # or SSN
- Data or information (particularly in combination) which would make the student's identity known with reasonable certainty

Data or information is considered de-identified once all PII has been removed. This includes data or information (particularly in combination) which would make the student's identity known with reasonable certainty.

School Official

Under FERPA, the College has the discretion to define what constitutes a school official. Grinnell defines it as follows:

- A person employed by the college in an administrative, supervisory, academic, research, or support staff position—including student employees, law enforcement personnel, and health staff.
- A person elected to the Grinnell College Board of Trustees
- A person, group, or organization assisting another school official in performing their professional responsibilities or who is employed by or under contract to the College to perform a specific task.
- A student serving as a representative on an official College committee.

Third Party

An individual, group, or organization that does NOT meet the criteria, as defined by the institution, to be considered a Grinnell College school official. Or an individual, group, or organization that DOES meet the criteria to be considered a Grinnell College school official but lacks a legitimate educational interest.

Grinnell College may not disclose a student's educational record to a third party (with certain exceptions) without the prior written consent of the student.