

# IMPLEMENTATION OF FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT REGULATIONS

Office of Operations Review and Audit  
University of Wisconsin System Administration

December 8, 2011

# Objectives

- ❑ Examine how institutions structure and provide administrative oversight for Family Educational Rights and Privacy Act Regulations (FERPA) implementation
- ❑ Review FERPA policies and procedures
- ❑ Describe FERPA training
- ❑ Examine UW practices in areas such as records release and access

# Background of FERPA

- ❑ Enacted in 1974 to protect the rights and privacy of parents and students
- ❑ Grants four primary rights to students who have attended an institution
- ❑ Student educational records are presumed to be private
- ❑ Disclosure allowable only with consent or if disclosure falls within an exception to the consent requirements

# Audit Approach

- Conducted site visits at seven institutions (UW-La Crosse, Madison, Milwaukee, Parkside, Whitewater, UW Colleges, and UW-Extension)
- Performed limited procedures at all other UW institutions
- Interviewed staff
  - ▣ Registrars or assistant registrars
  - ▣ Financial aid directors
  - ▣ Admissions directors
  - ▣ Deans or associate deans of students
- Collected and analyzed UW institution documents on FERPA

# Results



- UW institutions appear to generally be adhering to FERPA requirements
- Eight recommendations intended to further enhance the ability of institutions to effectively implement provisions of FERPA

# Recommendations

1. Designation of Lead Office (impacted 4 institutions)
2. Centralization and Review of FERPA Policies (impacted 5 institutions)
3. Training for Individuals with Access to Student Educational Records (impacted 6 of 7 institutions at which site visits were performed)
4. Review and Consolidation of Annual FERPA Notice (impacted 5 institutions)

# Recommendations, Continued

5. Review of Information Designated as Student Directory Information (impacted 1 institution)
6. Definition of “School Officials” and “Legitimate Educational Interest” (impacted 2 of 7 institutions at which site visits were performed)
7. Confidentiality Agreements (impacted 2 of 7 institutions at which site visits were performed)
8. Timely Removal of Access (recommended for consideration by all institutions)

Questions?