

## Fairfax County Public Schools

### FERPA Redaction Reference Guide

The information provided in this handout is meant only to provide basic guidelines to support schools with redacting records for a *Family Educational Rights and Privacy Act* (FERPA) request.

Written Records: For written records, always first make a copy of the record (never redact originals). Black out rather than white out redactions. Cover anything to be redacted with black marker, and then make a copy of the redacted record. When making the final copy, you may need to change the copier to a darker setting to ensure the redacted material does not show. Hold the final document up to the light to be sure the writing is completely covered. It is critical that all documents be reviewed for identifiable information about other students and redacted as necessary.

Electronic Records: For electronic records, print a hard copy of the record and redact accordingly. This may include a variety of electronic records, including EDSL information, emails, Google Apps for Education records, SIS data, etc. Refer to the FERPA request to ensure the school is supplying the requested information.

What to Redact: When reviewing a document containing student information, redact any identifying information for other students. This would include another student's name and, if mentioned, grade level, student id, parents' name(s), email addresses, etc. Also be sure to redact any contextual information that could be used to identify student. It is not sufficient to simply redact the student's name, since his or her identity could still be gleaned by the remaining contextual information. This information must be withheld to preserve the other student's identity.

Be sure to redact any attorney-client privileged work products or personal information of staff members, such as home addresses, HR information, or cell phone numbers.

#### ***Example***

Michael was recommended for expulsion for possessing a knife and threatening a student at school. Michael's parents will receive a redacted discipline packet through their FERPA request. In the packet is the following student witness statement:

*Witness: "John grabbed Michael's backpack and hit him over the head with it. After that, Michael pulled a knife from his pocket and threatened John. Jimmy, the boy who sits between John and Michael in class, told the teacher what happened."*

Before furnishing the discipline packet to Michael's parents, the school must redact any personally identifiable information about John and Jimmy not directly related to Michael. Since Michael likely knows who sits between John and him during class, Jimmy's name and the seating information must be redacted.

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As such, the statement above should be redacted to read:

*Witness: "█████ grabbed Michael's backpack and hit him over the head with it. After that, Michael pulled a knife from his pocket and threatened █████. ██████████ ██████████ told the teacher what happened.*

FERPA Redaction: Frequently Asked Questions:

1. *The student's name is in an excel spreadsheet that includes 489 other students. Do I print the whole spreadsheet or just the page with the target student?*  
You can print just the page that includes the target student. Be sure to redact all other identifiable student information on the page.
2. *Do I need to redact other students' ID numbers? Initials? Addresses?*  
Yes. Redact any identifiable information.
3. *Do I need to redact and submit documents such as personal notes or lessons left for substitute teachers?*  
Sole possession notes, which are made by one person as an individual observation or recollection of a student, and are kept in the possession of the maker, are not subject to FERPA requests. Sharing the notes with another person, or placing them where they can be viewed by others makes the "educational records" and subject to FERPA.