

# Teaching Online and FERPA

## ❖ WHAT IS THIS RESOURCE?

A brief overview of legal requirements of FERPA that are particularly relevant to university faculty teaching online. For a broader review of FERPA, see [the USC Registrar's website](#).

## ❖ HOW DO I USE IT?

Review the document before teaching an online course, to become familiar with the requirements of FERPA. For assistance, contact the USC Registrar's Office, [registrar@usc.edu](mailto:registrar@usc.edu).

## FERPA Basics

---

The Family Educational Rights and Privacy Act (FERPA) is a federal law that limits access to a student's educational records. Most relevant to faculty, FERPA restricts the sharing of personally identifiable educational records with anyone but the student and school officials with "legitimate educational interest."

FERPA prohibits the sharing of student educational records with a student's parents or other students. Students may allow individuals (such as their parents) access to their educational records by providing electronic authorization permitting the access.

Educational records covered by FERPA include

- Grades and exam scores
- Grade point average (GPA)
- Courses enrolled
- Test scores (SAT, GRE, etc.)
- Academic progress reports
- Disciplinary status
- Social Security number and ID number
- Personal information including birth date, religious affiliation, citizenship, ethnicity, gender, marital status

## Implications for Online Teaching

---

- Student grades (and other educational records) cannot be discussed or displayed in the presence of others, including during online class sessions in Zoom or during office hours.
- Grades may be posted only on FERPA-compliant platforms, such as the Blackboard Grade Center.
- Recorded Zoom sessions qualify as educational records for FERPA, because student names and images are displayed. Consequently, Zoom class recordings cannot be shared by the instructor with anyone not enrolled in the course.
- The USC Student Handbook ([SCampus 11.12](#)) prohibits students from recording classes and sharing course materials outside of the course, without permission of the instructor.
- Educational records may only be stored or communicated to students with ITS-approved applications, which include
  - Official USC learning management systems (LMS), including Blackboard and other LMS platforms used by individual USC schools.
  - USC Zoom (again, provided no other students are present in the Zoom room)
  - USC Slack
  - USC OneDrive/Microsoft Office 365, including Outlook
  - Email to the student's USC email account using the Instructor's USC email account.  
Note: When using email there is no guarantee of confidentiality.
- The following applications are **not** approved by ITS to store or communicate student education records
  - Google Drive, including USC-provided accounts
  - Dropbox, including USC-provided accounts
  - Email to non-USC email accounts
  - Online applications that have not been certified by USC ITS as FERPA-approved
- If a faculty member is discussing a student's educational record in a Zoom meeting, they are obligated to ensure that no one can overhear the conversation on the faculty member's side. You may wish to use the [Zoom lock meeting function](#) for meetings that discuss issues that are FERPA-protected.
- Online exam-proctoring services should only be used if FERPA-approved by USC ITS.

## Software and FERPA at USC

---

### ZOOM

Considerations for FERPA-compliant Zoom use are included above. Zoom has also published a [FERPA Guide](#).

### BLACKBOARD

Considerations for FERPA-compliant Blackboard use are included above. Blackboard has published a statement on their [response to FERPA](#).

### SLACK

Slack is approved to use in accordance with USC's FERPA and student-privacy policies. Please note there are specific requirements related to disclosing identifiable student information to others. Contact [usc-ciso@usc.edu](mailto:usc-ciso@usc.edu) or [compliance@usc.edu](mailto:compliance@usc.edu), if you have questions.

## TURNITIN

Turnitin is approved to use in accordance with USC's FERPA and student-privacy policies. Turnitin has published a statement on their [response to FERPA](#).

## OFFICE 365

USC-provided OneDrive (Microsoft Office 365) accounts are approved for the storage of many types of restricted information, including data covered under HIPAA and FERPA. For more information see [Storage at USC](#).

## GOOGLE DRIVE

USC-provided Google Drive accounts are approved for the storage of public and internal use only data; they are **not** approved for the storage of confidential data, including HIPAA- and FERPA-regulated data. For more information see [Storage at USC](#).

## DROPBOX

USC-provided Dropbox accounts are approved for the storage of public and internal use only data; they are **not** approved for the storage of confidential data, including HIPAA- and FERPA-regulated data. For more information see [Storage at USC](#).

## FAQ

---

What do I say to a parent who contacts me about their child's grades?

- Inform the parent that federal law restricts you from sharing the student's educational records and direct them to the USC Registrar's [FERPA for Parents page](#).

Can I put student information in a letter of recommendation?

- Written permission of the student is required for a letter of recommendation if any information included in the recommendation is part of the "education record" (grades, GPA, and other non-directory information). Ask students to request the letter of recommendation in an email, and save the email.

Can I allow people outside the course, such as guest lecturers, in a Zoom class session?

- Yes, people outside the course can participate as guest lecturers, but guests should not have access to student grades, other personal information, or the Zoom session recording.

Does it violate FERPA if a student shares a Zoom class recording with someone outside the class?

- No; because FERPA describes institutional obligations, it does not directly violate FERPA. However, such sharing is prohibited in The USC Student Handbook ([SCampus 11.12](#)).

Can I share course averages, or grade distributions for the class?

- Yes. FERPA only applies to personally identifiable information. Anonymized information may be shared, as long as it is not feasible to associate a grade with a particular student.

How do I know if an online technology tool or application is FERPA-compliant?

- Contact the TrojanSecure team at [TrojanSecure@usc.edu](mailto:TrojanSecure@usc.edu).

Who are school officials with "legitimate educational interest."

- A university official has a "legitimate educational interest" whenever they are performing a task specified in their position, description, or by a contract agreement; performing a task related to a student's education; performing a task related to the discipline of a student; providing a service or benefit relating to the student or student's family (such as health care, counseling, job placement or financial aid); or disclosure of information in response to a judicial order or legally issued subpoena. (NOTE: At USC all subpoenas are first reviewed by the Office of General Counsel to determine an appropriate response.)

Does FERPA apply to assignments where students are required to write a letter to the editor, a public blog, or social-media post?

- Yes, but the assignment can be FERPA-compliant as long as the student work does not identify their status as a USC student or their enrollment in a USC course.

## Informational Resources

---

[USC FERPA Information from the Office of Academic Records and Registrar](#)

[USC SIS Access Requests](#)

[U.S. Department of Education FERPA Information](#)

[Turnitin](#)

[Blackboard](#)