

Ask Professor FERPA

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Dear Professor FERPA,

I have a professor who wants to launch a research project comparing face-to-face classes to online classes. He wants grade rosters for classes showing the student name and corresponding grade in class. He has assured me he will not publish any student identity information. Can I provide the professor with the requested information?

Curious Registrar

Hello Curious,

§99.31(a)(1) is the exception to signed consent that generally permits a school official to access student education records. However, the official must be accessing them for a legitimate educational interest, which does not appear to be the case in your example.

This is because the project is for the official rather than a responsibility of the official's position at the University. There is another exception to signed consent found in §99.31(a)(6) – The Studies Exception – which permits the institution to agree to a study, but it requires a written agreement setting forth the purpose and scope of the “study,” and the conditions that apply. The exact written agreement conditions can be found in the regulations at §99.31(a)(6)(iii)(C), or on pages 160-161 in the *2012 AACRAO FERPA Guide*.

Good luck,

[The FERPA Professor](#)
