

Date: August 10, 2020

To: College Deans, Department Chairs, and Program Coordinators

From: William Watkins, Vice President for Student Affairs & Dean of Students
Diane Guido, Associate Vice President for Faculty Affairs



Re: Public Dissemination of Student Grades

Questions about the posting or dissemination of student grades and possible Family Educational Rights & Privacy Act (FERPA) and other privacy issues have been raised both on this and other campuses. This letter has been prepared to provide guidance to faculty on these matters and your assistance in sharing this information is requested.

Faculty members who post student grades on office doors or in other public areas or otherwise distribute class grade information, have done so primarily as a convenience to students or in an effort to acknowledge student success or improvement. Although well-intentioned, public dissemination of information about students' grades, be it electronically, by distribution of grade sheets, or even by informal announcement in class or elsewhere is a disclosure of private student records and constitutes a violation of FERPA.

Beyond these obvious violations, questions have arisen about other examples of public dissemination of student grade information. For example, what if, in an effort to protect students' privacy, a faculty member copies course rosters with student names deleted and posts grades using rosters which only show the grades and student identification numbers. A similar question has come up at other colleges and universities, where grades have been posted using students' social security numbers or portions thereof such as the last four digits. The issue is whether such posting, which does not include the students' names, could be construed as FERPA violations.

The U.S. Department of Education has advised that using even a portion of the social security number is forbidden under FERPA as a disclosure of student records with "personally identifiable information." Indeed, the definition of "personally identifiable information" under FERPA is not limited to names or social security numbers. Under Section 99.3 (D) of the Act, personally identifiable information is defined to include a "personal identifier, such as the students' social security number or student number." It should be noted that CSUN Policy Number 650-30 contains similar language ("student file number"). Thus, whether it is a student's social security number, student file number, or any portion of either one, there should not be disclosure.

For many faculty members, the question of publicly posting grades is no longer an issue. Students can access their final course grades electronically shortly after they are submitted. Faculty members who wish to continue to publicly post student grades are advised to use identifiers that are not associated with information in the student's record and are known only by the student and the faculty member. Among strategies that meet this standard are to generate numbers which are randomly assigned to students for use only during a particular course or to use identifiers created by the individual students and provided to the faculty member for use only in that particular course. Even with such identifiers, efforts should be made to avoid association of the identifier with a particular student, e.g., grades should be posted in a randomized order rather than alphabetically based on students' last names.

Should you have any questions about student records privacy, please feel free to contact either of us.

cc: Dianne F. Harrison, University President
Mary Beth Walker, Provost and Vice President for Academic Affairs
Michael Neubauer, Faculty President