FERPA Research Guidelines Within NAU

Thank you for your interest in conducting research using protected student information. For your research to proceed, you must meet the criteria listed below and provide a written response which details how your research adheres to the criteria. Your response will be evaluated by the Registrar’s Office who will respond via email, with approval or revisions, within 10 business days. To submit questions or clarifications, you may contact the Registrar’s Office at Joseph.Wright@nau.edu.

**Purpose:** To ensure the information is obtained by the investigator in such a manner that the identity of the human subjects cannot readily be ascertained directly or through identifiers linked to the subjects.

**Requirements for accessing and de-identifying education records:**

1. Specify the purpose, scope, and duration of the study or studies and the information to be disclosed;

2. Explain the conduct of the study which does not permit personal identification of parents and students by anyone other than representatives of the organization with legitimate interests;

3. Explain the steps taken to remove all personally identifiable information and determine that a student’s identity is not personally identifiable, whether through single or multiple releases, and considering other reasonably available information;

4. Explain the steps taken to de-identify student level data from education records for the purpose of education research by attaching a code to each record that may allow the recipient to match information received from the same source; and explain adherence to the following:
   a. do not disclose any information about how the institution generates and assigns a record code that would allow a recipient to identify a student based on a record code;
   b. the record code is used for no purpose other than identifying a de-identified record for purposes of education research and cannot be used to ascertain personally identifiable information about a student; and the record code is not based on a student's social security number or other personal information.

5. Identify the name(s) of the additional parties to which the receiving party may disclose the information on behalf of the educational agency or institution; and the legitimate interests under which each of the additional parties has in requesting or obtaining the information;

6. Require the parties receiving the information not disclose the information to any other party without the prior consent of the parent or eligible student.