



What Districts Need to Know About Directory Information and Use in Educational Resources

Directory information (DI) is information contained in a student's education records that would not generally be considered harmful or an invasion of privacy if disclosed.

Directory information is opt-out. Districts may release student directory information unless the parents submit a request to withhold it. (Directory Information Exception)

Educational records are opt-in. Districts must obtain prior written consent before releasing unless another exception applies. (School Official Exception)

DI is typically used for school-sponsored publications like yearbooks, sports and class photos.

Directory information is opt-out.

Can release unless there is a request to withhold it.

Sharing educational records are opt-in.

Can release only with prior written consent.

DI **does not include** a student's



Social Security Number



Student Identification Number



Grades/Academic Performance



Disciplinary Records



Student Content



Disability Status



Medical Records

The district must disclose specific DI in their notice. [PTAC Guidance](#) - To disclose student information under this exception, individual school districts **must establish the specific elements or categories of directory information** that they intend to disclose and publish those elements or categories in a public notice. While the directory information exception can seem to be an easy way to share PII from education records with providers, this approach may be insufficient for several reasons. First, **only information specifically identified as directory information in the school's or district's public notice may be disclosed under this exception.**

DI is opt-out per the FERPA Directory Information Exception, and districts **must** list the information they want to qualify as directory information as part of one of their **annual FERPA notices.**

DI ceases to be DI once it is **linked to non-directory PII** such as student content, or in-app performance data (e.g. ed-tech tools). This alone makes it unusable for most edtech apps.

Considerations before using directory information with third parties.

- If parents opt out, can the district/teacher provide the same experience for those students?
- Is any other non-directory information (e.g., student content, app inferences, etc.) being created?
- DI requires administrative time to process and maintain. Districts should ensure there is a procedure to document and honor any opt-outs that they receive.
- Is other PII that is not listed in your DI accessed?
- **Directory information may not be disclosed when linked to non-directory PII**, as this could indirectly reveal confidential data.
 - The [U.S. Department of Education's Dear Colleague Letter GEN-07-05](#) explicitly states that linking directory information to non-directory data, such as financial aid status, constitutes a disclosure of non-directory information and thus **requires authorization**. This rule ensures that even seemingly harmless data points do not become tools for identifying or exposing sensitive personal information.

Best Practices

- Use the School Official Exception and include ed-tech vendors in the district's annual notice under school officials.
- Obtain student data privacy agreements (NDPA) for resources sharing student PII.
- Any form of consent (opt in or opt out) should only be used for programs that are truly optional or which the school can track and manage.

In the best interest of the district, parents and students, obtaining a student data privacy agreement which includes the school official exception is the desired option when sharing PII with third parties.

We encourage districts to research directory information and use this information as guidance only.

Sources:

Consultation with the [Student Data Privacy Consortium](#) (SDPC)
[Protecting Student Privacy While Using Online Education Services: Requirements and Best Practices](#)
[U. S. Department of Education – Directory Information](#)
[34 CFR 99.3 – What definitions apply to these regulations?](#)
[U.S. Department of Education - FERPA](#)
[Fixing FERPA](#)
[Protecting Privacy of School Directory Information](#)
[Federal Register Rules and Regulation – Directory Information Update](#)
[Directory Information Limited to Identify Students in School Sponsored Activities](#)