

PSC Solution: TIP0055

Date: 11/24/2010

Application: ESS

School Year: N/A

File Specifications: N/A

Solution Type: Technical Tip

Title: Methods for protecting student data classified as PII

Issue Description:

This article discusses what methods states can use to protect students' Personally Identifiable Information (PII).

Under the Family Education Rights and Privacy Act (FERPA), an education agency is responsible to protect students' PII from disclosure when publishing data. **Currently, there is no single recommended method for protecting data**, so each agency must determine its own, appropriate method.

The "[Federal Committee on Statistical Methodology's Statistical Policy Working Paper 22](#)" is a comprehensive resource that describes the strengths and weaknesses of different methods for protecting students' PII and can help educational agencies design and implement strategies appropriate for their particular situation.

The following is an excerpt from the most recent regulations concerning FERPA, published in December 2008:

In response to requests for guidance on what specific steps and methods should be used to de-identify information (and as noted in the preamble to the NPRM, 73 FR 15584), it is not possible to prescribe or identify a single method to minimize the risk of disclosing personally identifiable information in redacted records or statistical information that will apply in every circumstance, including determining whether defining a minimum cell size is an appropriate means to protect the confidentiality of aggregated data and, if so, selection of an appropriate number. This is because determining whether a particular set of methods for de-identifying data and limiting disclosure risk is adequate cannot be made without examining the underlying data sets, other data that have been released, publicly available directories, and other data that are linked or linkable to the information in question. For these reasons, we are unable to provide examples of rules and policies that necessarily meet the de-identification requirements in Sec. 99.31(b). The releasing party is responsible for conducting its own analysis and identifying the best methods to protect the confidentiality of information from education records it chooses to release. We recommend that State educational authorities, educational agencies and institutions, and other parties refer to the examples and methods described in the NPRM at page 15584 and refer to the Federal Committee on Statistical Methodology's Statistical Policy Working Paper 22, www.fcsm.gov/working-papers/wp22.html, for additional guidance.