

School-official exception review

School and district privacy officers, education IT and procurement

[Read the complete guide on aona.ai](#)

An AI vendor is not a FERPA school official simply because a school buys its product. The exception requires the relevant institutional function, direct control over record use and maintenance, and applicable use and redisclosure restrictions. Check the school's notice criteria and limit access to legitimate educational interests.

An invented district considers a vendor for administrative drafting with student-record excerpts. Its proposed terms leave several required conditions unestablished.

Synthetic district, vendor and terms. No real FERPA exception, contract or institutional approval is determined.

Your review

Reviewer: _____ Date: _____

Organisation or team: _____

☐ **Name the institutional task**

Explain which service the school would otherwise use employees to perform.

☐ **Review enforceable control**

Document actual terms and procedures for use, maintenance and onward disclosure.

☐ **Match interest and access**

Apply the annual-notice criteria and limit the feature to the users and records needed.

Checked items record your review, not a compliance approval or an installed-product test result.

Notes and next actions

Decision and scope: _____

Evidence to collect: _____

Owner and next review date: _____

Review matrix

Condition	Fictional evidence	Outcome or next step
Institutional service or function	The school describes a limited administrative drafting task normally handled by employees.	Record that exact task; do not extend the scope to unrelated vendor uses.

Condition	Fictional evidence	Outcome or next step
Direct control	The proposal gives the vendor broad reuse discretion and no demonstrated school control over record maintenance.	Condition is not established in this case; resolve the arrangement before disclosure.
Use and redisclosure	Onward access by a connected service is not explained.	Identify recipient and purpose restrictions under the applicable rules.
Annual notice criteria	The district's actual notice criteria have not been compared in the example.	Check school-official and legitimate-interest criteria with the institutional owner.
Access limitation	Only the assigned team needs the specific administrative record.	Define users, records and feature permissions; a whole-school licence is insufficient evidence.
Illustrative decision	Required direct-control and onward-use facts remain unresolved.	Do not send student records on this route based on the school-official exception yet.

Four checks before relying on the exception

- **Function:** A defined institutional task
- **Control:** Use and maintenance under school control
- **Restrictions:** Permitted use and onward disclosure
- **Access:** Legitimate interest and notice criteria

Conditional decision path

- All applicable school-official conditions established: record the institution's scoped decision and safeguards.
- A required condition is not met: do not rely on this exception for the proposed disclosure.
- A material condition is unknown: resolve it before sending education records, or identify another applicable lawful route.

Safe alternative

Practise the administrative wording task with invented student information while the actual disclosure authority is assessed. This document does not obtain consent or approve a provider.

Sources and scope

Sources checked 2026-09-21. Review the current requirements and your actual agreement before using this workbook for a real decision. General information, not professional approval or a completed control test. It does not designate school officials, establish consent or approve FERPA disclosure exceptions.

[US Department of Education: FERPA regulations](#). 34 CFR 99 definitions, annual notice, school-official exception, legitimate educational interests and use/redisclosure restrictions.