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Washington Office of Superintendent of  
**PUBLIC INSTRUCTION**  
Chris Reykdal, Superintendent

ospi.k12.wa.us

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( ) Action Required  
(X) Informational

## BULLETIN NO. 016-26 DATA ANALYSIS AND SUPPORT

TO: Educational Service District Superintendents  
School District Superintendents  
School District Business Managers

FROM: Chris Reykdal, Superintendent of Public Instruction

RE: Student Directory Information: FERPA Requirements and OSPI Collection

CONTACT: Rhett Nelson, Director Student Information - Data Foundations  
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## PURPOSE/BACKGROUND

This bulletin is intended to:

1. Remind school districts of directory information obligations under the Family Educational Rights and Privacy Act (FERPA).
2. Clarify the required use of student directory information under Washington law.
3. Provide advance notice regarding the Office of Superintendent of Public Instruction's (OSPI) upcoming changes to student directory information collection.

### FERPA Requirements for Directory Information

Under FERPA, districts may designate certain student information as "directory information," which may be disclosed without prior written consent only if specific conditions are met. In particular, 34 C.F.R. § 99.37 requires districts to provide annual public notice to parents and eligible students that:

- Identifies the categories of information the district has designated as directory information.
- Describes the purposes for which directory information may be disclosed.
- Explain the right of a parent or eligible student to opt-out of directory information disclosures, including how and by when they must notify the district.
- Directory information may not be disclosed for any purpose that is not included in the district's public notice and opt-out requests must be honored.

### Disclosure to OSPI for Postsecondary Information Sharing

Washington state law requires school districts to provide high school student directory information to OSPI.

**RCW 28A.150.515** directs OSPI to share this directory information with eligible institutions of higher education and other authorized partners for limited purposes related to postsecondary education, including college awareness and outreach; admissions and enrollment information; and postsecondary education and financial aid opportunities.

This disclosure is allowable through FERPA's directory information framework. As a result, districts' annual FERPA notices must identify this disclosure to OSPI (and subsequent sharing for postsecondary purposes) as one of the purposes for which directory information may be released. Districts must honor parent and student opt-out requests.

## **OSPI Student Directory Information Collection**

In fall 2026, OSPI will again collect student directory information from school districts to support this statutory data sharing. Districts submit this information annually through the Education Data System (EDS) by uploading a formatted spreadsheet.

This collection occurs outside of CEDARS because directory information sharing depends on individual FERPA opt-out decisions, ensuring that directory information is only shared for students whose parents (or eligible students who) have not opted out.

**New for this collection cycle:** OSPI's student directory information collection will include student grade level as a required data element to allow institutions of higher education and other authorized partners to better target their outreach messages. This new data element is in addition to the existing elements of student id, student name, student and guardian contact information including mailing address, phone number and email.

To prepare for this collection, districts must ensure:

- Local policies defining "directory information" are current and include all data elements shared with OSPI, including grade level.
- Annual FERPA notices and opt-out communications clearly inform parents and eligible students that directory information is disclosed to OSPI and shared for postsecondary education outreach purposes under RCW 28A.150.515.

## **Resources**

Districts may find the following resources helpful when reviewing FERPA requirements, district directory information policies, and OSPI's student directory information collection:

- [EDS Application User Guides](#) for the most recent Student Directory Data Guide (OSPI)
- [Bulletin No. 005-24: High School Student Directory Information – Sharing with Higher Education Institutions](#) (OSPI)

- [RCW 28A.150.515](#) – High school directory information—Transmittal to the Office of Superintendent of Public Instruction
- [34 C.F.R. § 99.3](#) – FERPA definition of directory information
- [U.S. Department of Education – FERPA Model Directory Information Notice](#)

## INFORMATION AND ASSISTANCE

For questions regarding this bulletin, please contact Lisa Ireland, Lead Data Analyst, at 360-725-6358 or email [AskSI@k12.wa.us](mailto:AskSI@k12.wa.us). The OSPI [Telecommunication Relay Services](#) number is 711 or 1-800-833-6384.

This bulletin is also available on the [Bulletins](#) page of the OSPI website.

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Student Information – Data Foundations

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