

Safe AI Use with Student Data

WHY THIS MATTERS

FERPA protects personally identifiable information in student education records, and pasting it into an unapproved AI tool can count as an **improper disclosure**. The safe path is simple: use approved tools, strip identifiers, and check your work before and after.

1

Before you use a tool

2

Remove direct identifiers

3

Check for indirect clues

4

After the AI responds

1

Before you use a tool

- ☐ The tool is on my district's **approved list**.
- ☐ The district has a signed **data privacy agreement (DPA)** with the vendor.
- ☐ I'm signed in with my **school account**, not a personal one.
- ☐ The vendor does **not** use student data to train its AI models.
- ☐ If a tool isn't approved, I use only fully de-identified material, or I don't use it.

2

Before you paste: remove direct identifiers

Replace each with a code like **Student A, Student B**. Keep your key on paper or in a secure school file, **never in the AI chat**.

- | | |
|---|---|
| ☐ Student names, nicknames, and initials | ☐ Student ID numbers, usernames, and email addresses |
| ☐ Parent or guardian names, phone numbers, and addresses | ☐ Birthdates and photos |
| ☐ School, district, teacher, and class section names | ☐ File names that reveal who the document is about |

Check, then check again

3 Second pass: check for indirect clues

Removing names is not enough. In a small school, a detail or two can point to one child. Ask: **could someone in our community tell who this is?**

- ☐ Unique life events (a move, a family loss, an accident, a court matter)
- ☐ Health, disability, IEP, 504, or counseling details
- ☐ Discipline incidents or behavior records
- ☐ Rare combinations (the only student who plays trumpet and just moved from Ohio)
- ☐ Personal stories in student essays or journals
- ☐ **When in doubt**, generalize the detail or leave it out

4 After the AI responds

- ☐ I read and **fact-check everything** before using it.
- ☐ Grades, placements, and IEP decisions are **mine, not the AI's**.
- ☐ I put real names back only in my own secure school files.
- ☐ I delete chats that held student work if the tool allows it.
- ☐ I don't share AI outputs about students outside approved channels.

Rules of thumb

The newspaper test

If this prompt showed up in the local paper, would a family recognize their child?

Approved beats scrubbed

A district-approved tool with a DPA is safer than scrubbing and using a free tool.

Scrubber tools help but aren't perfect

Extensions that swap names for codes still miss indirect clues, so do the second pass anyway.

Not sure? Ask first

Check with your district technology coordinator or data privacy contact before you paste.