



# AACRAO

**American Association of Collegiate  
Registrars and Admissions Officers**

1108 16th Street, NW, Suite 400 | Washington, DC 20036  
(202) 293-9161 MAIN | (202) 872-8857 FAX | [www.aacrao.org](http://www.aacrao.org)

May 24, 2024  
Brad Jewell  
Chief Financial Officer & Treasurer  
The Honor Society of Phi Kappa Phi  
7576 Goodwood Blvd.  
Baton Rouge, LA 70806

Dear Mr. Jewell,

This letter is in follow up to my consultation visit to the Honor Society of Phi Kappa Phi (the Society) on March 8, 2024. The purpose of that consultation was to provide the Society an independent third-party evaluation of its Nimble AMS invitation process system from a Family Educational Rights and Privacy Act (FERPA) compliance perspective. The review included all facets of the process, with particular emphasis on those areas with FERPA relevance involving the collection, use, and protection of education records. The results of this review allow me to conclude that the FERPA issues are being successfully addressed by the Society. Below is a discussion of the FERPA issues considered in this review and how they are met by the Society.

FERPA requires that postsecondary institutions protect the privacy of student education records in their possession as well as provide the student access to such education records. However, the Society does not contract with or act on behalf of the institutions. Rather, it forms campus chapters which work directly with faculty sponsors who serve as chapter officers. Any education records provided to the Society by chapter officers consists exclusively of directory information. Directory information is defined in FERPA as “information contained in an education record that would not generally be considered harmful or an invasion of privacy if disclosed.” See §99.3 “Directory Information,” §99.31(a)(11), and §99.37. The Society only asks for directory information listed on the institution’s website and the template provided to chapter officers only includes those items. Depending on the institution’s directory information notice, this can include student name, home address, email address, grade level, and honors received (honor roll). While the Society may maintain the limited student information it receives for up to three years, because the information was received as directory information or provided directly from the student applying for membership, none of it is subject to FERPA.



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In addition, and as an added protection, the Society has policies and procedures in place for the handling and use of this student information. This includes a prohibition on accepting social security numbers or student grade point averages (GPA's). If this information is inadvertently provided, it is immediately deleted from their system.

In summary, because the student information discussed above is disclosed by campus chapter officers as directory information or is provided directly by the students in the membership application process, FERPA would not apply to the student information the Society's Nimble AMS invitation process system maintains. I trust the above analysis responds to any FERPA questions which might arise relating to the Society. I, of course, remain available to assist you should you have additional questions concerning this FERPA compliance review.

Sincerely,

A handwritten signature in black ink that reads "LeRoy Rooker". The signature is fluid and cursive, with a long horizontal line extending to the right.

LeRoy Rooker  
Senior Fellow  
AACRAO