

Disclosing Student Information in a Health or Safety Emergency

Who Can Release Information:

Utilizing the health or safety emergency exception for external reporting is the responsibility of school officials in these units:

- University of Arizona Police Department (UAPD)
- Office of Public Safety
- Campus Health
- Dean of Students (via submitted CARE reports)
- Other units as authorized by the Office of the Registrar

Examples of Health & Safety Exceptions:

- Reporting a health crisis to a parent (ex: a student has been hospitalized because of a sudden illness while living in a dorm)
- Reporting a threat to law enforcement outside of UAPD (ex: an online student living outside of Tucson has made threats about a local community organization via email, and UAPD contacts that local entity)
- Sending a UAlert to the campus community about an ongoing or impending incident

When is it permissible to utilize FERPA's health or safety emergency exception for disclosures?

In some situations, school administrators may determine that it is necessary to disclose personally identifiable information (PII) from a student's education records to appropriate parties in order to address a health or safety emergency. FERPA's health or safety emergency exception permits such disclosures **when the disclosure is necessary to protect the health or safety of the student or other individuals**. See 34 CFR §§ 99.31(a)(10) and 99.36. The exception to FERPA's general consent requirement is **limited to the periods of the emergency and generally does not allow for a blanket release of PII from a student's education records**. Rather, These disclosures must be related to an actual, impending or imminent emergency, such as a natural disaster, a terrorist attack, a campus shooting, or the outbreak of an epidemic disease.

From: <https://studentprivacy.ed.gov/faq/when-it-permissible-utilize-ferpa%E2%80%99s-health-or-safety-emergency-exception-disclosures>



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FERPA, the federal statute that generally requires the University to obtain the consent of students before disclosing information about them to others, contains several exceptions permitting disclosure *without* student consent, including **two that are particularly relevant in the context of a threat to health or safety:**

1. FERPA's "**school official**" exception allows University personnel to share student information *internally* with other University personnel who need the information in order to carry out their University functions. Common examples of such permitted sharing include faculty reporting student grades to the Registrar's Office for the purpose of official recording, the Registrar's Office in turn sharing that information with the Office of Scholarships and Financial Aid for the purpose of determining continuing eligibility for aid, and any number of units sharing student fees and charges with the Bursar's Office for the purpose of posting to the students' financial accounts. Under this exception, any University personnel who have any concerns at all that a student may present a threat to the health or safety of the student or others may – *and should* – report those concerns to the [Dean of Students Office](#), the [Threat Assessment and Management Team](#), and/or [University Police](#), which are the University offices specifically charged and prepared to assess and address such concerns. The easiest and fastest way to do so is to submit a [CARE report](#) to the Dean of Students Office.

2. FERPA's "**health and safety emergency**" exception also allows the University to share relevant student information about a significant threat of substantial harm to the health or safety of the student or others with anyone who can help to respond to the threat or needs the information to avoid the threat. Such disclosures may be made to a broader audience internally than that described above, such as to those who may be impacted by the threat, as well as *externally* to local law enforcement, the relevant student's parents, and potentially others. (Additional detail on this exception is available in the sidebar.) **Whenever reasonably possible, disclosures under *this* exception should be made *only* by the Office of Public Safety, University Police, Campus Health, the Dean of Students Office, and any other office specifically authorized to do so by the Registrar's Office.**

Resources

- CARE Report: https://arizona-advocate.symplificity.com/care_report/index.php/pid423338?
- UAPD: <https://www.uapd.arizona.edu/>
- Critical Incident Response Team: <https://cirt.arizona.edu/>

Questions or Guidance: registrar@arizona.edu



Office of the Registrar