

FERPA's Recordkeeping Requirement (34 CFR § 99.32)

We informally contacted eight school officials – three officials at elementary/secondary school districts and one official at an elementary school and four officials at postsecondary institutions. Most of the schools we contacted use a paper-based system for recordkeeping, while some of the postsecondary institutions use both paper-based and electronic. From our informal review, it is clear that the recordkeeping is done at the individual school (as opposed to the school district at the elementary/secondary level) and the individual postsecondary institution. We estimate that an average of .0833 hours (5 minutes) per disclosure is required for the recordkeeping requirement. The average number of disclosures per year is based on responses from the eight school officials. (Based on the type and size of the school, the number of releases vary.) Following is a breakdown of individual schools (public elementary, secondary, or combined) and postsecondary institutions:

No. of Schools:	97,382	
<u>Burden Hours: x</u>	<u>.0833</u>	
	8,111.92	
<u>Average No. of Disclosures: x</u>	<u>192</u>	
Total Burden Hours =	1,557,488.60	
No. of Postsec. Inst.:	6,463	
<u>Burden Hours: x</u>	<u>.0833</u>	
	538.37	
<u>Average No. of Disclosures: x</u>	<u>192</u>	
Total Burden Hours =	103,367.04	
Elementary/Secondary School Burden Hours:		1,557,488.60
<u>Postsec. Inst. Burden Hours: +</u>	<u>103,367.04</u>	
Grand Total Burden Hours:		1,660,855.64
Notification Grand Total Burden Hours		5,157.25
<u>Recordation Grand Total Burden Hours +</u>	<u>1,660,855.64</u>	
Total Burden Hours		1,666,012.89

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