PlannedQuest Inc.

FERPA Kit for Schools

Version 1.1 · Effective November 12, 2026 · plannedquest.com/legal/ferpa-school-kit

This kit is for the school, district or program that uses PlannedQuest. It gives you wording for your annual FERPA notice, explains what PlannedQuest holds and why, and shows how a parent or eligible student can see or correct a record. You may copy any part of it into your own notices.

> **In plain language.** Your school owns its student records. PlannedQuest holds them for you as a school official, uses them only to run PlannedQuest for you, and never sells them, advertises with them, or uses them to train AI. Requests from families go to you, and we help you answer them.

There is no FERPA certification, seal or audit, from the U.S. Department of Education or anyone else. This kit, our Data Privacy Addendum and our privacy policy describe what we do, and you can hold us to them.

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1. Wording for your annual FERPA notice

FERPA lets you share education records with a service provider without parent consent when your annual notice says who counts as a school official and what a legitimate educational interest is (34 CFR 99.7 and 99.31(a)(1)). If your notice already has this wording, check that it covers contractors like PlannedQuest. If not, you can paste the text below and replace the bracketed parts.

School officials. A school official is a person employed by [School or District] as an administrator, supervisor, instructor or support staff member; a person serving on the school board; and a contractor, consultant, volunteer or other party to whom [School or District] has outsourced a service or function it would otherwise use its own employees to perform. That party must be under the direct control of [School or District] with respect to the use and maintenance of education records, and must be subject to 34 CFR 99.33(a) on the use and redisclosure of personally identifiable information. For example, [School or District] uses PlannedQuest Inc. to provide a college and career planning platform for students and the staff and families who support them.

Legitimate educational interest. A school official has a legitimate educational interest if the official needs to review an education record to fulfill a professional responsibility, including providing a service the school has engaged the official to provide, such as college and career planning.

2. What PlannedQuest holds, and why

PlannedQuest holds only what your school gives it or what students and staff create while using it, and uses it only to run the service for you.

What	Examples	Why
Account and roster	Name, school email, role, school, grade level, school-assigned student ID, and a state student ID where you supply one	To create accounts and place each person in the right school
Student work	Saved careers, colleges and programs, plans, portfolio entries, assessment and survey responses, reflections	To deliver the planning work your school assigns
Things a student chooses to share	The situation checklist (see section 4) and any note the student adds	So staff can point the student to the right support
Staff notes	Notes a counselor, teacher or coach attaches to a student	So staff can support the student
Use of the site	Pages viewed, sign-ins and security events, IP address	To keep the service working and secure

The full list, with how long each is kept, is in section 6 of our privacy policy and in Annex A of the Data Privacy Addendum. The companies that process data for us, and where, are listed on the privacy policy. We never sell student data, never use it for advertising, and never use it to train an AI model.

Who can see a student's records. Inside PlannedQuest, staff see the students they are responsible for: teachers see their classes, counselors their caseload, and School Admins their school or district. A linked and verified parent sees their own child. Every request is checked on our servers against the person's current role. Our own support staff reach a student's records only to support and repair the service, and those reads are recorded.

3. Directory information

PlannedQuest never publishes student information. It has no public profiles, no public links to a student's work and no student directory, so nothing we hold is released as directory information.

What this means for your directory-information policy (34 CFR 99.37):

- You share records with PlannedQuest as a school official, not under the directory-information exception. A family's directory opt-out does not stop that sharing, and you do not need to treat PlannedQuest as a directory recipient.
- A student's portfolio can be seen by another organization the student belongs to only if the student turns that on.
- If your notice lists the people you share directory information with, PlannedQuest does not need to be on that list.

4. Sensitive questions and the PPRA

PlannedQuest offers students an optional situation checklist so staff can point them to support. Some items touch topics the Protection of Pupil Rights Amendment (PPRA) protects, such as mental health,

family income, pregnancy or parenting, and involvement with the justice system. Students choose whether to answer, and skipping everything does not reduce what the platform does for them.

What your school controls today:

- You can make the checklist optional, turn it off, or hide individual items for your organization.
- Answers are visible to the student's assigned staff, can be listed and exported by staff, and are not shown on a linked parent's home view. Where the platform builds a plan, up to three items can appear in the plan's "Considerations for you" section, which a linked parent can see. You can turn that off for your whole organization.
- We make every checklist and questionnaire available to you, so you can let families review them and opt out through you, as the PPRA expects.

Suggested sentence for your PPRA notice: "[School or District] uses PlannedQuest for college and career planning. Students may choose to answer optional questions about their circumstances, some of which touch protected topics. Parents may review these questions and ask that their child not be offered them by contacting [office or email]."

5. When a parent or eligible student asks

The records are yours, so families ask you, and we help you answer quickly. An eligible student is one who is 18 or older, or attends a postsecondary institution.

To see a student's records (inspection, 34 CFR 99.10). You must respond within 45 days. A School Admin can download one student's records from the School Admin portal under More, "Student records". If your portal does not show that option yet, write to privacy@plannedquest.com and we prepare the records for you within 10 business days. We leave out other students' information.

To ask for a correction (34 CFR 99.20 to 99.22). The family asks you, and you decide whether the record is inaccurate or misleading, including any hearing. Your staff can correct most information in PlannedQuest themselves. For anything they cannot change, write to privacy@plannedquest.com and we make the change within 10 business days.

To see who has opened a student's records (34 CFR 99.32). We keep a record of access each time staff open a student's records. School Admins, District Admins and Organization Admins can see it under More, "Who opened a record". If your portal does not show that option yet, ask us and we send it to you.

To delete a student's records. Write to privacy@plannedquest.com from a School Admin account. We delete within 30 days and confirm in writing, except the records our Data Privacy Addendum lists as kept for a stated reason.

When a student turns 18. FERPA rights move from the parent to the student. Your school decides what that means for any parent link in PlannedQuest.

6. How to reach us

- Privacy questions and requests: privacy@plannedquest.com, subject line "Privacy Request"

- Security concerns: security@plannedquest.com
- Phone: 949 685 7029

If someone at your school should receive our privacy notices, such as a notice of a new subprocessor, write to privacy@plannedquest.com with their name and email. If you have not named anyone, we send notices to your School Admins.

PlannedQuest Inc. · privacy@plannedquest.com · security@plannedquest.com · support@plannedquest.com