# Ask Professor FERPA: Does a web search for plagiarism have FERPA implications?

Dear Professor FERPA,

A speaker at a recent education conference I attended mentioned that professors putting student's words from a paper into Google to check for plagiarism is not appropriate because it is a public search engine and that information entered is collected in a server outside of institutional control. In such cases, the speaker argued, instructors often do not get permission from the students, so it is a violation of FERPA.

Is this practice actually a violation of FERPA? Does it make a difference if a program like Safe Assign or Turn-It-In is used?

Sincerely,

A FERPA Follower

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Dear FERPA Follower,

Submitted student papers by a professor to a plagiarism service would not have FERPA implications so long as *all personally identifiable information is removed*. This would be the same whether Google, Safe Assign, Turn-It-In, or any other service is used.

The issue here is that these services maintain the papers for their own future use which, in personally identifiable form, is not permitted under FERPA. They are not maintaining on behalf of the institution, but rather for their own proprietary purposes. §99.31(b)(1) De-identified records and information says, in part, that an educational institution or agency may release education records or information contained in education records without the consent required by §99.30 if, and only if, all personally identifiable information has been removed from the release. As such, papers could be submitted with a number that identifies a student at the institution; however, this code could not be shared with the plagiarism service, and the student's identity could only be known by the institution.

Hoping that clears things up,

Professor FERPA