

October 2, 2015

Kathleen M. Styles, JD, CIPP-G  
Chief Privacy Officer  
U.S. Department of Education  
400 Maryland Ave., SW  
Washington, D.C. 20202

*Via Email: [FERPA.Comments@ed.gov](mailto:FERPA.Comments@ed.gov)*

Re: Comments on August 18, 2015 Draft Guidance  
*Dear Colleague Letter to School Officials at Institutions of Higher Education*

Dear Ms. Styles,

Thank you for the opportunity to comment on the draft guidance regarding FERPA. The University of Northern Iowa concurs with the comments submitted on September 29, 2015, by the American College Health Association.

We would like to comment further on one point. Most of our discussion has revolved around the idea that various state laws and codes of ethics for counseling and health professionals would ensure medical records privacy and would appear to trump anything FERPA would say about an institution's ability to share or release a record. In other words, physicians and counselors in our Health Center are going to hold students' records private because their licensure requires it, regardless of what FERPA suggests is allowable. We wonder why the question of privacy obligations of providers has not been articulated as part of the discussion and suggest that it would be appropriate to address.

We would be pleased to respond to any questions you might have.

Sincerely,



Patricia L. Geadelmann, Ed.D.  
Assistant to the President for  
Board and Governmental Relations