

School Resource Officer (SRO) Data Sharing

School Resources Officers (SROs) provide important safety support for schools across the Commonwealth. In some instances, it may be necessary for schools or districts to share limited student data with SROs to help facilitate their work. This guidance document reviews important considerations for SRO data sharing.

General Considerations for Data Sharing

Access to student data is governed by the Family Educational Rights and Privacy Act (FERPA). While the general rule under the FERPA is that the release of data that includes personally identifiable information (PII) requires written consent from parents or guardians, there are limited exceptions for school staff who have an educational need to know. Data that includes PII may be shared without prior consent under the following circumstances:

(1)(i)(A) The disclosure is to other school officials, including teachers, within the agency or institution whom the agency or institution has determined to have *legitimate educational interests*.

(B) A contractor, consultant, volunteer, or other party to whom an agency or institution has outsourced institutional services or functions may be considered a school official under this paragraph provided that the outside party—

(1) Performs an institutional service or function for which the agency or institution would otherwise use employees;

(2) Is under the direct control of the agency or institution with respect to the use and maintenance of education records; and

(3) Is subject to the requirements of §99.33(a) governing the use and redisclosure of personally identifiable information from education records.

(ii) An educational agency or institution must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate educational interests. An educational agency or institution that does not use physical or technological access controls must ensure that its administrative policy for controlling access to education records is effective and that it remains in compliance with the legitimate educational interest requirement in paragraph (a)(1)(i)(A) of this section.

(2) The disclosure is, subject to the requirements of §99.34, to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for purposes related to the student's enrollment or transfer.

Depending on local arrangements, SROs may meet one or more of these exemptions, allowing for the sharing of student records. As local leaders are charged with supervising access to data, local districts should consult their Board Counsel when determining whether an SRO meets the exemption criteria and subsequently developing data sharing agreements.

Federal Guidance Related to SRO Data Sharing

The U.S. Department of Education’s Privacy Technical Assistance Center’s (PTAC) published a helpful guidance document “[School Resource Officers, School Law Enforcement Units, and the Family Educational Rights and Privacy Act \(FERPA\)](#).” This document contains numerous frequently asked questions and answers to help school districts navigate when they may share PII with SROs and other law enforcement units, as well as the types of information that may be shared.

Additional Considerations for Data Sharing Agreements

As education records are highly sensitive, local districts should consider the following when developing data sharing agreements and procedures with SROs.

- Data sets that include PII should only be shared with individuals with a clear educational need to know. Local leaders should consider the scope of work assigned to the SRO when determining which data elements may be appropriate to share.
- In instances where the SRO is not a district employee, local leaders should establish clear data sharing agreements that outline exactly which data elements will be shared, the method for sharing the data, and considerations for storing and destroying data. Since FERPA requires that a contractor be “under the direct control of the agency or institution with respect to the use and maintenance of education records” the Memorandum of Agreement (MOA) or contract for an SRO’s services should address the sharing of FERPA protected information with an SRO, and bind the SRO to applicable school district policies for the confidentiality of FERPA protected information.
- If records are downloaded and shared with SROs, districts should ensure that records that include PII are shared through secure file transfer processes, such as email encryption with password, Adobe encryption with password, or the use of secure document transfer sites.

Procedures for Accessing Transfer Records

A student transferring into a district and who has behavior in a prior district will have a Behavior Summary as a transfer document in the Student Records Transfer (SRT) section of Infinite Campus (IC). Reference KDE’s [Student Records Transfer Data Standards](#).

SRO Data Sharing November 2025

Status: Records released.

Transfer Documents		Data imports
Transcript	Term 1 - Progress Grade 1	Transcript Import Wizard
Census Contact Summary	Term 1 - Progress Grade 2	Extended Census Import Wizard
Extended Census Summary	Term 1 - Semester Grade	Enrollment History Import Wizard
Enrollment History	Term 2 - Progress Grade 1	Assessment Import Wizard
Schedule	IEP	Immunization Import Wizard
Attendance Period Detail	Special Ed Evaluation	Health Condition Import Wizard
Assessment Summary	IEP Documents	Health Screening Import Wizard
Behavior Summary	PLP	IEP Import Wizard
EL Document	PLP Documents	Special Ed Evaluation Import Wizard
Gifted & Talented Documents	Health Documents	Special Ed Documents Import Wizard
Homeless Services Documents	Counseling Documents	PLP Import Wizard
Gifted	ILPA	PLP Documents Import Wizard
Health Condition Summary	ILPA Documents	Health Documents Import Wizard
Health Screening Summary	English Learners (EL)	Counseling Documents Import Wizard
Health Immunization Summary	EL Services	Gifted Documents Import Wizard
Homeless Summary	EL Accommodations	ILPA Import Wizard
Homeless Service Summary	Adult Ed	ILPA Documents Import Wizard
	Early Learning	KY State Reporting Import Wizard
		English Learners (EL) Import Wizard

Once the transfer document is imported, the document is available for viewing in the student's behavior management tool as an Adobe file via Student Information | General | Behavior.

Behavior ☆

Student Grade: 11 DOB

Print Current Calendar
 Print All Years
 Behavior Management
 Detention
 Transfer Doc 115 Christian County 10/27/2025