Data Sharing Decision Tree

Student data is protected under three federal laws which dictate how and with whom it may be shared: The Federal Educational Rights and Privacy Act of 1974 (FERPA); the Higher Education Act of 1965, as amended (HEA); and the Privacy Act.

Depending on the choices your campus makes about administering its emergency aid program, you may find it necessary to share student data between offices. Use this decision tree to ensure that your campus-wide emergency aid collaboration efforts are compliant with federal student datasharing rules. You should also ensure compliance with any applicable state privacy laws.

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Does the data you plan to share consist of aggregate statistics, rather than individual, personally-identifiable data?

- Yes
- No

If Yes:

- Is the information being requested only available to the institution via the FAFSA (such as the student’s income)?
  - No
  - Yes

If No:

- Has the student provided written consent for disclosure of the data in question?
  - Yes
  - No

If Yes:

- Will the information be used for the application, award, and/or administration of Title IV funds, state aid, and/or institutional aid programs?
  - Yes
  - No

If No:

- Is the information being requested considered directory information (if the student hasn’t opted out)?
  - Yes
  - No

If Yes:

- Is the disclosure to other school officials determined to have a legitimate educational interest in the disclosed information?
  - Yes
  - No

If No:

- Has the student provided explicit written consent?
  - Yes
  - No

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Disclosure is permitted

Disclosure is not permitted