

Financial Aid Data & Data Sharing Restrictions



The University of Vermont

Restrictions on use of financial aid data

- Data can be used for the application, award, and administration of aid awarded under federal student aid programs, state aid, or aid awarded by eligible institutions.
- Generally speaking, any released data needs to be de-identified and aggregated unless it can be demonstrated that it is for the purpose of awarding or administering financial aid.
- School officials receiving financial aid data must demonstrate a legitimate educational interest in the information.
- Some allowances: organizations conducting research on behalf of the institution; accrediting agencies; parents of dependent students; judicial orders, scholarship agencies (with student's written permission)



Increased Oversight on Financial Aid Data Sharing

- Data requests will be funneled through the Data Sharing Decision Tree produced by the National Association of Student Financial Aid Administrators (NASFAA). Some cases will require a judgement from the SFS Compliance Officer and the SFS Director.
- There is a newly-released Data Sharing Decision Tree which expands release criteria to include scholarship agencies with student's written permission.
- Likely a new focus for Federal Program Reviews and annual student aid audits.



Consequences of failure to comply

- Jeopardize eligibility for Title IV Federal Student Aid programs
- Fines for non-compliance
- Reputational risk
- Legal implications for President and Chief Aid Officer



No Title IV Federal Funding



Our role as data stewards and analysts

- Our obligation is to the individual student, to do no harm
- Need to maintain consistency in how and when data is captured and reported
- Determine if data use and release is permissible and ensure it remains protected
- Providing data context
- Translating data requests: what is requested versus what the requester actually wants or needs

Case Study #1

An institution's housing office requests financial aid award data to determine if a student qualifies for a housing fee deferral.

Solution: Any type of award data is FAFSA data and thus is subject to HEA restrictions. Because the purpose of the disclosure is related to the effective administration (disbursement) of financial aid, the financial aid office may disclose the requested information. However, in a case such as this, it is advisable to provide the minimal amount of data required.



Case Study #2

Institutional Research is seeking income data for all incoming first-year students to determine trends in a student's persistence to graduation based on income level.

Solution: The income data from the FAFSA will not be used to award student aid or for the administration of aid, so this is not a permitted use of the FAFSA data under the HEA restriction. However, the financial aid office would be permitted to disclose aggregated, de-identified data presented as a descriptive statistic.



Case Study #3

The office of undergraduate studies has contracted an outside entity to review student data and make recommendations to increase retention. The outside entity requests financial aid recipients' award information, but not necessarily income or other FAFSA data. The office of undergraduate studies would like to provide the award data.

Solution: Data from the FAFSA has not been requested, but award information has. This information may not be released to the outside entity, since it will not be used for the administration of an aid program.



No Soup for you!

We cannot provide student level data



Student ID	First Name	Last Name	Grade	Enrollment	Aid
aaaaaaa	Jim	Davis	11	86,254	\$ -
bbbbbb	Chris	Wilson	11	94,234	\$ 2,000
cccccc	Chris	Dog	11	43,230	\$ 10,000
ddddd	Liz	Wilson	11	75,289	\$ 8,000
eeeee	Jon	Huckle	11	23,567	\$ 16,000

No Soup for you!

- Department requests a list of Pell Grant eligible students so that they can give students school supplies
- Current vendors request financial information about students that have enrolled, what financial aid they were given and family income
- Foundation is seeking financial information on parents to target development efforts (not a UVM scenario)

Questions?