

## University of Alaska Financial Aid Data-Sharing Policy

### Background

Financial aid officers collect, manage, and have access to a vast amount of confidential student and parent data. This data includes information from the Free Application for Federal Student Aid (FAFSA), the Institutional Student Information Record (ISIR) and the National Student Loan Data System (NSLDS). It also includes information from other sources, such as tax returns, professional judgment documents, student progress data and other private and sensitive information.

Laws and guidelines that control the release of student data:

1. Higher Education Act (HEA), as amended
  - a. Section 483(a)(3)(E)
  - b. Section 485B(d)(2)
2. Family Educational Rights and Privacy Act (FERPA)
3. Privacy Act
4. IRC Code
5. NASFAA Statement of Ethical Principles
6. Alaska Constitution (Art. 1, §22)
7. Alaska Personal Information Protection Act (APIPA)

### Policy

FAFSA data contains sensitive financial and personal information of students and their families. It is the responsibility of all personnel with access to such data to maintain strict confidentiality and adhere to all applicable privacy laws and regulations.

Only authorized personnel within the Financial Aid Office and Institutions shall have access to FAFSA and Federal Tax Information (FTI) data. Access to this data shall be granted on a need-to-know basis for the sole purpose of processing financial aid applications and administering financial aid programs.

FAFSA data shall not be shared with individuals or entities outside the Financial Aid Office unless explicitly authorized by the student or required by law. This includes, but is not limited to, a general prohibition against sharing FAFSA data with other departments, faculty, staff, students, third-party vendors, or external organizations. The Higher Education Act sections 99.31(a)(3)(iii), 99.35 and 483(a)(3)(E) allow the University of Alaska to report student personally identifiable information, including FAFSA data, on federal reports. These reports are used to evaluate federal education programs, such as IPEDS, NPSAS and Gainful Employment reporting.

The Financial Aid Office shall implement appropriate technical, physical, and administrative safeguards to protect FAFSA data from unauthorized access, disclosure, alteration, or destruction. These measures shall be intended to comply with industry best practices and applicable laws and regulations.

All personnel with access to FAFSA data shall be required to complete annual training on the importance of confidentiality, data security procedures, and their responsibilities under this policy. Regular training sessions and updates shall be provided to ensure ongoing awareness and compliance. Any violations of this policy shall be reported to the appropriate authorities within the institution.

Appendix:  
Data Sharing Decision Tree

[https://www.nasfaa.org/uploads/documents/NASFAA\\_Data\\_Sharing\\_Decision\\_Tree.pdf](https://www.nasfaa.org/uploads/documents/NASFAA_Data_Sharing_Decision_Tree.pdf)

