

FAFSA Data Sharing Case Studies

Scenario #1: Sharing student data to proactively identify eligibility for public benefits

An institution's Single Stop or other similar wraparound student services center seeks to proactively identify students who may be eligible for public benefits such as free or subsidized health care, housing, or nutrition benefits, and wants a list of students with dependents whose incomes fall below a certain level.

Solution: Student income and whether the student has dependents is FAFSA data, the authorized sharing of which falls under 483(a)(3)(E) of the Higher Education Act (HEA). Prior to the 2019 data-sharing authority expansion, sharing would not have been permitted, even with student permission. The new statutory language passed in the FY 2019 spending package, however, would permit the sharing of this information (with the student's written permission) because the data-sharing would be for the purpose of assisting the student in applying for and receiving federal, state, or local financial assistance for a component of the Cost of Attendance. The Family Educational Rights and Privacy Act (FERPA) also applies in this instance because the financial aid office is sharing the student's personally identifiable information (PII). However, because the student's permission to share PII was granted with their signed consent, sharing is permitted under FERPA as well. Because the nature of this request is to be proactive vs. in response to the student having initiated a process, student permission would likely have had to have been obtained separately, possibly via an institutional admissions or financial aid application, or through the institution's student portal.

Scenario #2: Data-sharing for emergency aid programs administered by the school's foundation

An institution's emergency financial aid program is administered by their foundation. Their criteria require that a student have unmet financial need in order to qualify for emergency aid, and request access to this information.

Solution: If the foundation considered unmet need to be the difference between Cost of Attendance (COA) and estimated financial aid (EFA), as one would calculate private loan eligibility, data sharing is permitted under FERPA provided the institution has obtained the student's written consent. HEA data sharing rules would not apply because ED does not consider either COA or total EFA to be FAFSA data. However, if the foundation considered unmet need as the difference between COA, EFA, and Expected Family Contribution (EFC) and those items were disaggregated, HEA data sharing rules would apply. The FY 2019 expanded data-sharing authority permits disclosure of FAFSA data like EFC to organizations assisting the student in applying for and receiving federal, state, local, or tribal financial assistance for any part of the Cost of Attendance and, as such, would be permitted with the student's written consent.

Scenario #3: Sharing student data to prioritize applications or determine eligibility for on-campus child care

An institution provides on-site child care for students with dependents. They offer subsidies on a sliding scale based on family income, and/or prioritize placements based on need and would like access to student income and/or EFC information in order to make their decisions, without requiring the student to complete a separate application.

Solution: FAFSA data like income and EFC could previously only be shared for purposes of applying for, awarding, and administering Title IV funds, state aid (interpreted as only state student financial assistance), and institutional aid. If the child care subsidy came from federal CCAMPIS funds or from a state fund, sharing income and EFC data would not have been allowed prior to the 2019 change in statute. With the new HEA language introduced in the FY 2019 spending bill, however, sharing of income and/or EFC data would be permitted (with written student permission) to the child care center, regardless of the source of the subsidy. FERPA requirements regarding sharing of PII would be satisfied with the student's written consent.

Scenario #4: Sharing student data with the institutional housing office to identify students who might qualify to live on campus during breaks

An institution's housing office wants to conduct outreach to students with housing insecurity to notify them of the option to stay on campus during scheduled breaks. They would like to know which students have self-identified as homeless or at risk of homelessness on the FAFSA.

Solution: Since these questions appear on the FAFSA, they are FAFSA data and are subject to the HEA data-sharing rules. The information will not be used for the application, award, or administration of Title IV, state, or institutional aid programs, and will not go to an organization assisting the student in applying for or receiving federal, state, local, or tribal assistance. In this case, data-sharing is not allowed. The financial aid office could, however, offer to reach out on behalf of the housing office to at-risk students without disclosing to the housing office exactly what criteria were used to identify them, and students could then follow up on their own with the housing office.