Information Sharing Policy and Procedure

Due to the nature of our work, the Financial Aid Office is entrusted with highly sensitive information about each student and his/her family. Our staff is obligated to safeguard this information in compliance with three applicable laws that govern access to, disclosure of and use of student financial aid information. The three applicable laws include:

• The Family Education Rights and Privacy Act (FERPA)
• The Higher Education Act of 1965, as amended (HEA)
• The Privacy Act of 1974, as amended (Privacy Act)

FERPA protects the privacy of students, in part by prohibiting post-secondary institutions from disclosing personally identifiable information (PII) contained in education records to any third party – including the student’s parents – without permission. FERPA applies to all post-secondary institutions that receive federal funds.

The HEA specifically prohibits the use of FAFSA data for any reason other than the application, awarding, and administration of financial aid awarded under federal, state or institutional student aid programs.

The Privacy Act of 1974 governs the collection, maintenance and use of records maintained by federal agencies and generally prohibits agencies from disclosing data contained in those records. The Privacy Act can impose restrictions on institutions as well if a federal agency lawfully provides the institution with records or access to records.

WHAT DOES THIS MEAN FOR ICC STUDENTS?

According to recent guidance from the US Department of Education’s Privacy Technical Assistance Center (PTAC), data that ICC is allowed to release to a third party entity is limited. Section 483(a)(3)(E) of the Higher Education Act of 1965 (HEA) limits the use of FAFSA application data to the application, award, and administration of Title IV funds, state aid, and institutional programs. PTAC’s guidance clarifies that the HEA restriction applies broadly to FAFSA data, ISIR data, key processing results, expected family contribution (EFC), awards derived from FAFSA data/results, and the student’s financial aid history.

Due to this new restriction, ICC cannot release these data elements to a third party (such as housing assistance programs, federal/state/county benefit programs, outside scholarship providers, etc.), even with the student's permission. However, ICC can release this data directly to the student. When a form is received from a third party, the ICC Financial Aid Office will send a response letter letting the agency know of our information sharing policy and that requested data will be coming from the student directly.

Students wanting to share information pertaining to their FAFSA or award letter data with third-party entities can bring the agency request form to the ICC Financial Aid Office. ICC will complete the form with the data requested and contact the student once the form is completed and ready for pick-up. If requested, ICC will mail the form to the student using the address information we have on file, not to the agency requesting the data. ICC cannot fax or e-mail these forms directly to the agency. In addition, ICC staff/faculty cannot mail or fax these forms on behalf of students using school envelopes or office fax machines. This mitigates any conflict in whether data was shared with the third-party agency by the school versus the student. It is the student’s responsibility to deliver the form to the requesting agency. A notation will be made on each completed form indicating 1) that the form was given to the student directly and 2) the date the form was provided to the student.

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Itasca Community College is committed to a policy of nondiscrimination in employment and education opportunity. No person shall be discriminated against in the terms and conditions of employment, personnel practices, or access to and participation in, programs, services, and activities with regard to race, sex, color, creed, religion, age, national origin, disability, marital status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local commission as defined by law. This information is available in alternative formats to individuals with disabilities. Consumers with hearing or speech disabilities may contact us via their preferred Telecommunications Relay Service - ann.vidovic@itascacc.edu or 218-322-2433 or 1-800-996-6422.