**Decision Tree for Sharing ("Disclosing") Financial Aid Data**

Adapted from the NASFAA Decision Tree

**Important Notes:**
- Consult IU General Counsel for subpoenas, court orders, law enforcement, and public records requests.
- When in doubt, consult your campus financial aid director or the University Financial Aid Director.

### START: Are you providing the student’s own financial aid data to the student seeking or receiving financial aid?

- **Yes**: Disclosure permitted
- **No**: Next question

### Has the student provided explicit written consent to share this financial aid data with the requestor?

- **Yes**: Disclosure permitted
- **No**: Next question

### Is the information being requested considered directory information with no FERPA data sharing restriction from the student? Note that financial aid award information and FAFSA information are NOT directory information, so for these answers no to this decision point.

- **Yes**: Disclosure permitted
- **No**: Next question

### Will the information be used for federal Title IV, state, and/or institutional financial aid programs? Example: For any request that asks for a flag that individual students received a particular award, see the box to the right (decision tree path of Yes) to make sure an IU financial aid director has given approval.

- **Yes**: Disclosure permitted
- **No**: Next question

### Are you providing the student’s financial aid data to other IU officials whom the IU financial aid director has determined to have a legitimate educational interest in the requested information?

- **Yes**: Only de-identified aggregate statistics disclosure is permitted (headcounts < 11 are masked).
- **No**: Next question

### Are you providing the student’s financial aid data to any of the following?

- **Yes**: Disclosure permitted
- **No**: Next question

#### - Judicial order or subpeona
#### - Financial Aid officials at an institutions other than IU where the student seeks to enroll and related to the student’s enrollment or transfer?
#### - Authorized representatives of the US Comptroller General, US Attorney General, US Secretary of Education, or state educational authorities?
#### - Accrediting agency (e.g. Higher Learning Commission) as required for their accrediting functions?
#### - Parent of dependent student as defined by the IRS (Title 26 U.S. Code Section 152) requests access using [https://studentcentral.indiana.edu/personal-information/give-access.html](https://studentcentral.indiana.edu/personal-information/give-access.html)

### Are ALL of the following true?

- The data are for a scholarship granting organization, tribal organization, or other organization that is helping the student apply for/receive federal, state, local, or tribal financial assistance,
- AND the financial aid is for the standard costs of attendance,
- AND the student provided explicit written consent.

- **Yes**: Disclosure permitted
- **No**: Disclosure NOT permitted

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**Institutional Analytics/Compliance and Reporting**

[https://iuia.iu.edu/](https://iuia.iu.edu/)

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