

Office of Student Financial Aid

Privacy Policy

Under the Program Participation Agreement (PPA) and the Gramm-Leach-Bliley Act (15 U.S. Code § 6801), Roger Williams University is committed to protect student financial aid information by ensuring the security and confidentiality of student financial aid records and information. Furthermore, the Family Educational Rights and Privacy Act of 1974 (as amended), commonly referred to as the Buckley Amendment, sets forth the educational information of a student and how that information should be treated to protect student privacy.

Privacy of Personal Information

The Office of Student Financial Aid recognizes that specific items of information about current (as well as former) individual students and their families must be collected, maintained, and used for the awarding of financial aid. It is our policy that such information be controlled and safeguarded in order to ensure the protection of personal privacy to the extent permitted by the law.

Records Management & Retention

In addition to the Financial Aid Office, the offices of the Bursar, Registrar and Admissions are responsible for maintaining records required by federal and state regulations. For records maintained by offices other than Financial Aid, please see the respective policies and procedures guides for those departments.

An electronic file is made for all students who apply for financial aid. These files are kept on a secured site that has limited access. Other documents that are kept in paper form are kept in either a vault or secure filing cabinet.

Records kept electronically are accessible on the Roger Williams University networks and are frequently backed-up for security and loss prevention.

Use of Personal Information

Under the Higher Education Act of 1965, the Office of Student Financial Aid is allowed to use the information students provide on the FAFSA to determine eligibility to receive federal, state, and institutional student financial aid. Sections 483 and 484 of the Higher Education Act of 1965, as amended, give us the authority to ask you and your parents these questions, and to collect the Social Security Numbers of you and your parents. We use your Social Security Number to verify your identity and retrieve your records, and we may request your Social Security Number again for those purposes.

State and institutional student financial aid programs may also use the information that you provide on the FAFSA to determine if you are eligible to receive state and institutional aid and the need that you have for such aid.

Roger Williams University respects and follows the FERPA regulations. The Registrar's Office is responsible for all outside requests for information on students.

Use of Personal Identifiable Information

As stated on the FAFSA, without your consent, we may disclose information that you provide to entities under a published "routine use." Under such a routine use, we may disclose information to third parties that we have authorized to assist us in administering the above programs; to other federal agencies under computer matching programs, such as those with the Internal Revenue Service, Social Security Administration, Selective Service System, Department of Homeland Security, Department of Justice and Veterans Affairs; to your parents or spouse; and to members of Congress if you ask them to help you with student aid questions.

If the federal government, the U.S. Department of Education, or an employee of the U.S. Department of Education is involved in litigation, we may send information to the Department of Justice, or a court or adjudicative body, if the disclosure is related to financial aid and certain conditions are met. In addition, we may send your information to a foreign, federal, state, or local enforcement agency if the information that you submitted indicates a violation or potential violation of law, for which that agency has jurisdiction for investigation or prosecution. Finally, we may send information regarding a claim that is determined to be valid and overdue to a consumer reporting agency. This information includes identifiers from the record; the amount, status and history of the claim; and the program under which the claim arose.

Disclosure of Personal Information (Internal)

The Financial Aid Office will only release a student's financial aid information to offices that are directly involved with the student financially. This would include the Bursar, the Vice President of Finance and, on a limited basis, the Registrar's Office, Center for Academic Services, and Student Affairs. No information can be given to instructors or academic advisors without the student's written permission. Internal requests are accepted in writing or in person and can be handled by any member of the financial aid staff.

Disclosure of Personal Information (Students and Custodial Parents)

Requests for student information must be in writing and sent to the Registrar's Office. Requests for student information from the Department of Education regarding a loan can be handled directly by the Office of Financial Aid and are disseminated to the appropriate counselor.

In order to disclose financial aid information, the student and the custodial parent (if dependent) must sign a FERPA release form. This form states who is to receive the information. The student can rescind the consent in writing at any time.

Disclosure of Income and Tax information from the FAFSA with the applicant (and, if applicable, his or her spouse or parents) unless the FAFSA applicant (and, if applicable, his or her spouse or parents) can only be done after authenticate their identity.

Information about a student's financial aid is confidential and can only be given to the student directly or via mail. Only general information will be given over the phone or by e-mail. In addition, if the student is over the age of eighteen and is not claimed on the parent's taxes, no information can be released to the parent or guardian without a Financial Aid FERPA release.

Information Release In-Person

In order to disclose information from the FAFSA (income and tax information) to the student or parent in person, we must follow security protocols:

A FAFSA applicant (or custodial parent) appearing in person and presenting an unexpired, valid government issued photo identification (e.g. a driver's license, non-driver's identification card, other State issued identification, or U.S. passport) is a secure way of doing so for purposes of disclosing FAFSA information. A student can also present their RWU ID as a form of identification. For non-custodial parents or others (not on the FAFSA), we will require a FERPA Release form as well.

Information Release via Telephone

In order to disclose information from the FAFSA (income and tax information) to the student or parent over the phone, we must follow security protocols.

For student/ parent requests for information on the FAFSA, we must inform the student and/or parent that due to security reasons and for authentication, they must provide the following information: name, last four digits of the social security number, date of birth, and zip code. Phone requests for academic information are not accepted. Phone calls can be directed to the Registrar's Office for further assistance.

Information Release via E-mail

In order to disclose information from the FAFSA (income and tax information) to the student or parent via e-mail, we must follow security protocols. Only general information can be released by e-mail.

For student/ parent requests for information on the FAFSA, we must inform the student and/or parent that due to security reasons and for authentication, we can only release general information by e-mail. Personal Identifiable Information will not be shared via e-mail.

Students and parents can contact the office for specific information as it relates to the FAFSA. Security protocol for release of information via phone must be followed.

Disclosure of Personal Information (Non-Custodial Parents)

In order to disclose financial aid information, the student and the custodial parent (if dependent) must sign a FERPA release form. The form states who is to receive the information. The student can rescind the consent in writing at any time. Copies of all consent documents are kept on file with the Registrar's Office. Financial Aid FERPA releases are kept by the Financial Aid office.

Data Security/Privacy Incidents

In order to protect personal information of residents of the Commonwealth of Massachusetts (201 CMR § 17.00) and residents of the State of Rhode Island (R.I.G.L. § 11-49.3-1), and in compliance with any other applicable law or regulation (the "Regulations"), Roger Williams University ("RWU") has developed the following Written Information Security Program (the "Program") to address the requirements of the Regulations.

The Program's goal is to set forth effective administrative, technical and physical safeguards for personal information; to provide an outline to assure the ongoing compliance with the Regulations; to protect personal information from unauthorized access, use, modification, destruction or disclosure; and to position RWU to comply with future privacy and safety regulations as such may develop.

To safeguard personal information, the Chief Security Officer will conduct a risk assessment. The initial risk assessment will seek to reveal the following potential and actual risks to the security and privacy of personal information:

- Unauthorized access of personal information by an employee not entitled to the information.
- Compromised system security as a result of unauthorized access by a third party.
- Interception of personal information during transmission.
- Unauthorized access to paper files containing personal information.
- Unauthorized access to personal information through mobile personal devices.

The Chief Security Officer will discuss findings and recommendations resulting from the periodic reviews with relevant RWU personnel.

The Chief Security Officer will evaluate RWU's security practices to determine where improvement is necessary to limit risks, including, but not limited to, ongoing employee training, employee compliance with security policies and procedures, means for detecting and preventing security system failures, and the upgrade of safeguards, if necessary, to limit risks.

Disposal

RWU has implemented a record retention policy and schedule. When disposing of files containing personal information, RWU will follow its policy and schedule, which will include:

- Shredding all hard copies of files containing personal information when such information is no longer required or needed to be maintained by RWU.
- Destroying all electronic files containing personal information when such information is no longer required or needed to be maintained by RWU, including the destruction of residual electronic data on computers and other electronic devices.