Project: Family Educational Rights and Privacy Act (FERPA) Authorizations

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Background

Students currently elect to provide access to their student records as permitted by FERPA, using several disparate methods:

- Submitting paper FERPA release form per Financial Aid,
- Granting access through the Banner Proxy Portal, and/or
- Granting access through TouchNet.

However, each of these mechanisms creates a disjointed and siloed experience for students and their authorized users.

A single approach to managing FERPA authorizations will improve user experience for both students and staff.

Terminology

In this document, we talk about several terms that are described here for easy reference:

- **Family Educational Rights and Privacy Act (FERPA)**[1] is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education…FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level.
- **Eligible Students** are students to whom the rights have transferred from their parents for one of the reasons outlined in the Family Educational Rights and Privacy Act. *Because SHSU is a "school beyond the high school level," any enrolled student— regardless of age—is an Eligible Student.* Therefore, any student is an Eligible Student.
- **Authorized Users** are those individuals who have been granted access to an Eligible Student's records.
- **FERPA authorizations** occur when an eligible student grants an Authorized User access to the Eligible Student's records.

Goals

Use low-code tools to:

- Design and implement a process to collect authorization for release of FERPA information from authenticated students.

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[1] https://www2.ed.gov/ferpa

- Provide an interface for employees to search for and access FERPA authorization selections by SamID.
- Provide an interface for employees to make a record of the specific information communicated to authorized users.
- Maintain a history of FERPA authorizations by students for audit purposes.

Data Needs

Student Data collected:

- SHSU Login

Data for authorized individuals:

- Name
- Permanant Address
- Email
- Phone number

Categories of information authorized to release:

Financial Aid and Scholarships	Student Account Records	Student Academic Record Information Release
•FAFSA/TASFA Application status •Scholarship application status •Verification requirements and status •Status of awards •Eligibility for aid (Satisfactory Academic Progress) •Eligibility for earning aid paid (Attending classes) •Financial Aid Hold Information	•Billing Statements •Account Activity •1098Ts •Payment Activity and Payment History (Includes cash like payments, state exemptions, waivers, third party contracts, external scholarships, disbursed financial aid, electronic check and card payments) •Payment Plan and Payment Communications •Financial Enrollment Drop Status •Financial Refund Activity (This does not allow authorized users to pick up or receive refund payments)	•Grades •Academic Standing •Degrees •Transcripts •Enrollment Status (registration/resignation) •Graduation status •Class Schedules •Registration holds •Excessive hours

Eligible Student Stories

The following stories refer to an app designed for use by Eligible Students. Although the final name may vary, we refer to this app as *FERPA Authorization Self-Service* to distinguish it from the administrative interface described later in this document.
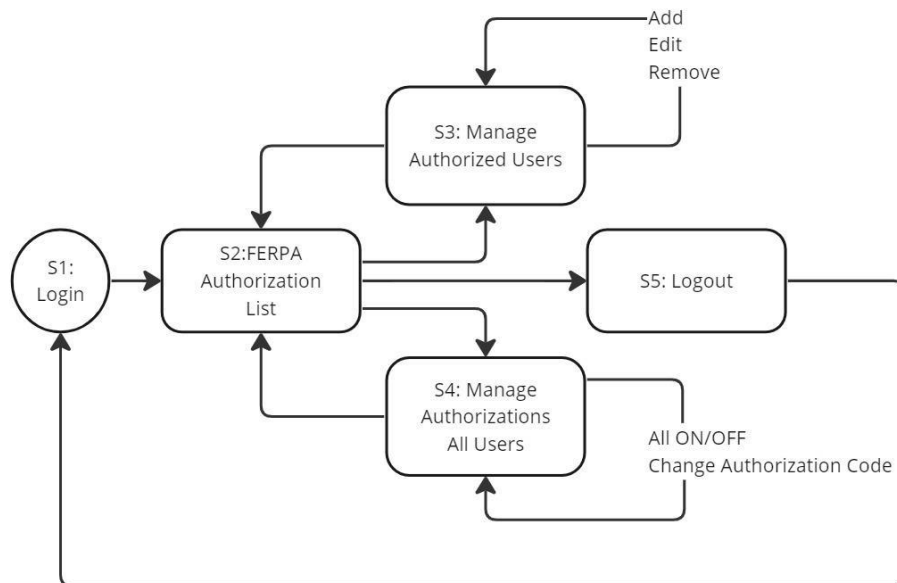
Figure 1: FERPA Authorization Self-Service Application Flow

S1. Student Login

When a student enters their credentials into *FERPA Authorization Self-Service*, she wants to authenticate so that she can manage her FERPA Authorizations.

Implementation Details

- Students must authenticate using their valid SHSU username and password.

Acceptance Criteria

Scenario: Invalid login

Given a student accesses *FERPA Authorization Self-Service*
When a student unsuccessfully authenticates by entering invalid credentials
Then they receive an error message that their credentials are invalid.

Scenario: Valid login

Given a student accesses *FERPA Authorization Self-Service*
When a student successfully authenticates by entering valid credentials
Then they are presented with the FERPA Authorization List.

S2. FERPA Authorization Dashboard post-login

When a student successfully completes login to the *FERPA Authorization Self-Service*, she wants to see a listing of both Authorized Users and the Access Levels so that she may maintain who is allowed to see her student records and what level of access they have.

Implementation Details

- Students can enter an unlimited number of authorized users.

Scenario: Student has no current Authorized Users and/or no current Access Levels.
Given has successfully authenticated into the *FERPA Authorization Self-Service*
When the student accesses the FERPA Authorization Dashboard
      And they have no authorizations on file.
Then they are presented with a message that they have no Authorized Users
      and/or no current Access Levels on file
      and instructions for how to enter authorizations.

Scenario: Student has existing Authorized Users and/or no current Access Levels.
Given has successfully authenticated into the *FERPA Authorization Self-Service*
When the student accesses the FERPA Authorization Dashboard
      And they have FERPA authorizations on file.
Then they are presented with a table of authorized users
      and they are presented with a list of authorized access
      and instructions for how to update authorizations.

S3. Manage Authorized Users

When a student chooses **Manage Authorized Users**, she wants to enter, update, or inactive the information for authorized users so that they can discuss her student records with SHSU personnel.

Implementation Details
- All authorized users have the same level of access to the student's data
- The student may specify the level of access (all or none) for all authorized users – rather than separate permissions per user.

Acceptance Criteria
Scenario: Add New User – Success
Given a student chooses Add New on the Manage Authorized Users
When they enter the required fields with acceptable data
Then the data is saved to the system
      and the student receives a confirmation that the data was successfully saved.

Scenario: Add New User – Failure
Given a student chooses Add New on the Manage Authorized Users
When they enter unacceptable data
Then the data is not saved to the system
      and the student receives a confirmation that the data was not saved.

Scenario: Update User – Success
Given a student chooses an existing user on the Manage Authorized Users
When they enter the required fields with acceptable data
Then the data is saved to the system
      and the student receives a confirmation that the data was successfully saved.

Scenario: Update User – Failure

Given a student chooses an existing user on the Manage Authorized Users

When they enter unacceptable data

Then the data is not saved to the system

and the student receives a confirmation that the data was not saved.

Scenario: Inactivate User

Given a student chooses an existing user on the Manage Authorized Users

When they check the ON/OFF selection to OFF

Then the authorized user is removed from the Authorized User list

and is listed in the inactive list

and the student receives confirmation that the data was successfully saved.

S4. Manage Authorizations

When a student chooses **Manage Authorizations**, she wants to identify the level (all or none) of permissions her Authorized Users should have so that those Authorized Users may contact SHSU to discuss those authorization levels for which they have been authorized.

Implementation Details

- All authorizations are displayed as toggles all authorization level where:
  - **On** is equivalent to **Authorized** and
  - **Off** is equivalent to **Not Authorized**.
- Authorizations default to **Off** if not previously chosen.
- Previously saved authorizations are loaded and displayed to students when returning to **Authorized Users List**.
- Eligible Students must choose all authorization levels (**On** or **Off**) prior to saving.
- The **Authorization Code** which is shared with all Authorized Users may be changed here.

A sample design could be:

Acceptance Criteria

Scenario: First-Time User

Given a student chooses Manage Authorizations
            and has not previously added
When the student adds an Authorized User
Then they receive a tutorial page on filling out the information

Scenario:
Given a student
When the student
Then they

Scenario:
Given a student
When the student
Then they

Eligible Employee Stories

The following stories refer to an app designed for use by Eligible Employees. Although the final name may vary, we refer to this app as FERPA Authorization Admin.
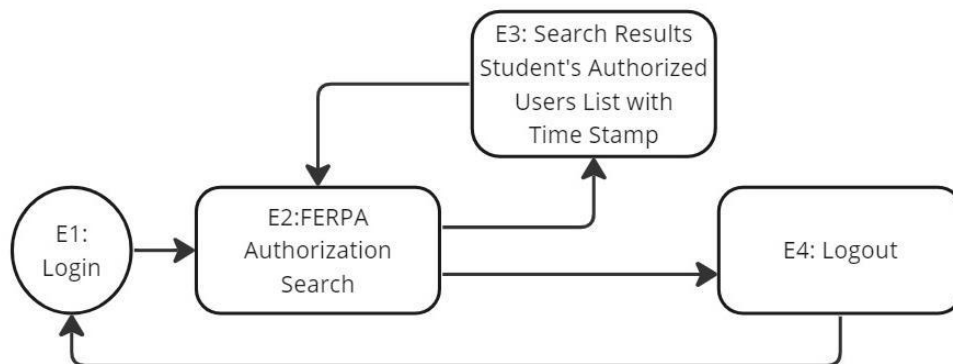
Figure 2: FERPA Authorization Admin Application Flow

E1. Employee Login

When an employee enters their credentials into FERPA Authorization Admin, she wants to authenticate so that she can view a student's designated FERPA Authorizations and Authorized Users.

Implementation Details

- Employees must authenticate using their valid SHSU username and password.

Acceptance Criteria

Scenario: Invalid login

Given an employee accesses *FERPA Authorization Admin*
When an employee unsuccessfully authenticates by entering invalid credentials
Then they receive an error message that their credentials are invalid.

Scenario: Valid login

Given an employee accesses *FERPA Authorization Admin*
When an employee successfully authenticates by entering valid credentials
Then they are presented with the FERPA Authorization Dashboard.

E2. Employee Search and Display of FERPA authorizations

When an employee enters a SamID and chooses **Search**, they want to locate the record for that student's authorizations, so that they can understand the authorizations the student has saved via *FERPA Authorization Self-Service*

Implementation Details

- A SamID belongs to a single student.

Acceptance Criteria

Scenario: Employee search for student – Success

Given an employee enters a SamID into the search field

When they enter a valid SamID
Then they are presented with a *Search Result* with a table of the student's FERPA authorized users and a timestamp of the student's FERPA authorizations

Scenario: Employee search for student – Failure
Given an employee enters a SamID into the search field
When they enter an invalid SamID
Then they are presented with a Search Result indicating the SamID did not match a student

Scenario: Employee return to FERPA Authorization Admin
Given an employee has completed viewing a student's authorizations
When they choose **Return to Search** on the Search Result
Then they are presented with the FERPA Authorization Dashboard

E3. Searchable FERPA Authorization Audit History

When an employee is viewing a *Search Result* and chooses **Audit History**, they want to see a table of historical changes to student authorization selections, so they can have knowledge about the changes students have made to their authorizations over time and clarify misunderstandings.

Implementation Details
- Question – how far back? Determined by ES group

Acceptance Criteria
Scenario: Employee chooses Audit History
Given an employee is viewing a *Search Result*
When they choose **Audit History**
Then they are presented with an *Audit History* for the student

Scenario: Employee chooses Return to Result
Given an employee is viewing an Audit History
When they choose **Return to Result**
Then they are presented with a Search Result for the student

E4. User Documentation for Students and Parents

When a student accesses the system for the first time, they want to access detailed instructions, so they can understand how to make authorizations to their information.

Implementation Details
- On-screen tutorial

Acceptance Criteria
Scenario: Student needs instructions to use FERPA Self-Service
Given a student wants to understand how to use the FERPA Self-Service Application
When they choose **Help**
Then they are presented with FERPA Self-Service on-screen tutorial

Limitations

1. Initially, this will be limited to the departments within Enrollment Success. Other departments will be approached later.

Assumptions

- Access to human and technical resources needed to complete the project.
- Scope of project does not change.