
Recordkeeping and Disclosure

In this chapter, we discuss the requirements for maintaining and disclosing records for the FSA programs.

The General Provisions regulations require schools to maintain records related to their participation in the FSA programs. These records must be made available by schools to representatives of the Department and other specified individuals or organizations in the course of audits, program reviews, investigations, or other authorized reviews.

In addition to the general institutional recordkeeping requirements discussed here, a school must also comply with all program-specific recordkeeping requirements contained in the individual FSA program regulations.

This chapter also describes the rules governing disclosure, including a discussion of the Family Educational Rights and Privacy Act (FERPA). FERPA restricts the disclosure of student records to other parties and requires the school to give a student the opportunity to review his or her records.

REQUIRED RECORDS

A school must keep comprehensive, accurate program and fiscal records related to its use of FSA program funds. The importance of maintaining complete, accurate records cannot be overemphasized. Program and fiscal records must demonstrate the school is capable of meeting the administrative and fiscal requirements for participating in the FSA programs. In addition, records must demonstrate proper administration of FSA program funds and must show a clear *audit trail* for FSA program expenditures. For example, **records for each FSA recipient must clearly show that the student was eligible for the funds received, and that the funds were disbursed in accordance with program regulations.**

The FSA Assessment module that can assist you in understanding and assessing in your compliance with the provisions of this chapter is "Reporting and Recordkeeping," at

<http://ifap.ed.gov/qamodule/ReportingReconciling/AssessmentFpage4.html>

Recordkeeping cite
34 CFR 668.24

Program records

A school must establish and maintain on a current basis any application the school submitted for FSA program funds. A school must also maintain on a current basis program records that document:

- the school's eligibility to participate in the FSA programs,
- the FSA eligibility of the school's programs of education,
- the school's administration of the FSA programs,
- the school's financial responsibility,
- information included in any application for FSA program funds, and
- the school's disbursement and delivery of FSA program funds.

Program Records a School Must Maintain

The program records that a school must maintain include, but are not limited to:

- ✓ Program Participation Agreement
 - ✓ Accrediting and licensing agency reviews, approvals, and reports
 - ✓ State agency reports
 - ✓ Audit and program review reports
 - ✓ Self-evaluation reports
 - ✓ Other records, as specified in regulation, that pertain to factors of financial responsibility and standards of administrative capability
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FISCAL RECORDS

A school must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements. Schools are required to account for the receipt and expenditure of all FSA program funds in accordance with generally accepted accounting principles.

A school must establish and maintain on a current basis:

- financial records that reflect each FSA program transaction, and
- general ledger control accounts and related subsidiary accounts that identify each FSA program transaction and separate those transactions from all other institutional financial activity.

Fiscal Records a School Must Maintain

The fiscal records that a school must maintain include, but are not limited to:

- ✓ Records of all FSA program transactions
 - ✓ Bank statements for all accounts containing FSA funds
 - ✓ Records of student accounts, including each student's institutional charges, cash payments, FSA payments, cash disbursements, refunds, returns, and overpayments required for each enrollment period
 - ✓ General ledger (control accounts) and related subsidiary ledgers that identify each FSA program transaction (FSA transactions must be separate from school's other financial transactions)
 - ✓ Federal Work-Study payroll records
 - ✓ Records that support data appearing on required reports, such as:
 - Pell Grant Statements of Accounts
 - ED Payment Management System cash requests and quarterly or monthly reports
 - FSA program reconciliation reports
 - Audit reports and school responses
 - State grant and scholarship award rosters and reports
 - Accrediting and licensing agency reports
 - Records used to prepare the *Income Grid* on the FISAP
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General records

In addition, a school must maintain the records that pertain to the general administration of FSA program funds (listed on the chart on the following page.)

In addition, participants in the:

- Perkins Loan Program must follow procedures in Section 674.19 for documenting the repayment history for each borrower for that program (see Volume 6 – Campus-Based Programs); and
- FWS Program must follow procedures established in Section 675.19 for documentation of work, earnings, and payroll transactions for the program (see Volume 6 – Campus-Based Programs).

Loan Program Records

Loan program record cite
34 CFR 682.610

There are special record keeping requirements in the Direct and FFEL loan programs. A school must maintain —

- A copy of paper or electronic loan certification or origination record, including the amount of the loan and the period of enrollment.
- The cost of attendance, estimated financial assistance, and estimated family contribution used to calculate the loan amount (and any other information that may be required to determine the borrower's eligibility, such as the student's Federal Pell Grant eligibility or ineligibility).
- The date(s) the school disbursed the loan funds to the student (or to the parent borrower), and the amount(s) disbursed. (For loans delivered to the school by check, the date the school endorsed each loan check, if required.)
- Documentation of the confirmation process for each academic year in which the school uses the multi-year feature of the Master Promissory Note. This may be part of the borrower's file, but acceptable documentation can also include a statement of the confirmation process that was printed in a student handbook or other financial aid publication for that school year. The documentation may be kept in paper or electronic form. There is no retention limit for this documentation; you must keep it indefinitely because it may affect the enforceability of loans.

A school must keep records relating to a student or parent borrower's eligibility and participation in the Direct Loan or FFEL program for three years after the end of the award year in which the student last attended the institution. A school must keep all other records relating to the school's participation in the Direct Loan or FFEL program for at least three years after the end of the award year in which the records are submitted.

General Records a School Must Maintain

A school must maintain records for each FSA recipient that include, but are not limited to:

- ✓ The Student Aid Report (SAR) or Institutional Student Information Record (ISIR) used to determine a student's eligibility for FSA loans
- ✓ Application data submitted to the Department, lender, or guaranty agency by the school on behalf of the student or parent
- ✓ Documentation of each student's or parent borrower's eligibility for FSA program funds (e.g., records that demonstrate that the student has a high school diploma, GED, or the ability to benefit)
- ✓ Documentation of all professional judgment decisions
- ✓ Financial aid history information for transfer students
- ✓ Cost of attendance information
- ✓ Documentation of a student's satisfactory academic progress (SAP)
- ✓ Documentation of student's program of study and courses in which enrolled
- ✓ Data used to establish student's admission, enrollment status, and period of enrollment
- ✓ Required student certification statements and supporting documentation
- ✓ Documents used to verify applicant data, and resolve conflicting information
- ✓ Documentation relating to each student's or parent borrower's receipt of FSA program funds, including but not limited to:
 - The amount of the grant, loan, or FWS award; its payment period; its loan period, if appropriate; and the calculations used to determine the amount of grant, loan, or FWS award;
 - The date and amount of each disbursement or delivery of grant or loan funds, and the date and amount of each payment of FWS wages;
 - The amount, date, and basis of the school's calculation of any refunds/returns or overpayments due to or on behalf of the student; and
 - The payment of any refund/return or overpayment to the FSA program fund, a lender, or the Department, as appropriate.
- ✓ Documentation of and information collected at any initial or exit loan counseling required by applicable program regulations

In addition, a school must maintain records that include, but are not limited to:

- ✓ Reports and forms used by the institution in its participation in an FSA program, and any records needed to verify data that appear in those reports and forms
 - ✓ Documentation supporting the school's calculation of its completion or graduation rates, and transfer-out rates (see chapter 6).
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RECORD RETENTION PERIODS

Records cite

34 CFR 668.24

Additional record retention cite

34 CFR 668.27

Schools must retain all required records for a minimum of three years from the end of the award year. However, the starting point for the three-year period is not the same for all records. For example, some campus-based program records must be kept for three years from the end of the award year in which the funds were awarded and disbursed. **Schools must keep the Fiscal Operations Report (FISAP) and any records necessary to support their data (e.g., the source data for the income grid) for three years from the end of the award year in which the FISAP is submitted.** The most current FISAP, which will contain 2003-2004 data, must be submitted during the 2004-2005 award year, will request 2005-2006 funds, and has a submission date of October 2004. Because this FISAP will be submitted during the 2004-2005 award year, records must be kept until at least June 30, 2008, three years from the last day of the 2004-2005 award year.

There are additional exceptions to the general record retention periods for repayment records for Perkins Loans and records related to a FFEL or Direct Loan borrower's eligibility and participation in those programs. There are also additional record retention requirements that apply to schools granted waivers of the audit submission requirements.

Different retention periods are necessary to ensure enforcement and repayment of FSA loans. Perkins Loan repayment records, including cancellation and deferment records, must be kept for three years from the date that the loan was assigned to the Department, cancelled, or repaid. Perkins original promissory notes and original repayment schedules must be kept until the loan is satisfied or needed to enforce the obligation (for more information, see *Volume 6 – Campus-Based Programs*). Records relating to a borrower's eligibility and participation in the FFEL and Direct Loan programs must be kept for three years from the last day of the award year in which the student last attended the school.

The chart on the next page illustrates the required minimum retention periods for records under the various FSA programs.

A school may retain records longer than the minimum period required. Moreover, a school may be required to retain records involved in any loan, claim, or expenditure questioned in any FSA program review, audit, investigation, or other review, for more than three years (see chapter 12 for information on program reviews and audits). If the three-year retention period expires before the issue in question is resolved, the school must continue to retain all records until resolution is reached.

Minimum Record Retention Periods

FSA Program	<i>End of the award year in which the report was submitted</i>	<i>End of the award year for which the aid was awarded</i>	<i>End of the award year in which the student last attended</i>	<i>The loan is satisfied or the documents are needed to enforce the obligation</i>	<i>The date on which a loan is assigned to the Department, cancelled, or repaid</i>
Campus-based and Pell Grant		3 YEARS			
Except:					
• Fiscal Operations Report (FISAP) and supporting records	3 YEARS				
• Perkins repayment records (after 12/87, includes original repayment schedule, though manner of retention remains same as promissory note)					3 YEARS
• Perkins original promissory notes (before 12/87, included original repayment schedule)				UNTIL	
FFEL and Direct Loans					
• Records related to borrower's eligibility and participation			3 YEARS		
• All other records, including any other reports or forms	3 YEARS				

RECORD MAINTENANCE

Acceptable formats

A school must maintain all required records in a systematically organized manner. Unless a specific format is required, a school may keep required records in

- hard copy
- optical disk
- microform
- CD-ROM
- computer file
- other media formats

Record retention requirements for the Institutional Student Information Record (ISIR) are discussed later in this chapter. All other record information, regardless of the format used, must be retrievable in a coherent hard copy format (for example, an easily understandable printout of a computer file) or in a media format acceptable to the Department. The requirement providing for other media formats acceptable to the Department allows for the use of new technology as it is developed. The Department will notify schools of acceptable media formats; schools should not apply for approval of a media format.

Any document that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be maintained in its original hard copy or in an imaged media format. This includes tax returns, verification statements, and Student Aid Reports (SARs) used to determine eligibility, and any other document when a signature seal, etc., contained on it is necessary for the document to be used for the purposes for which it is being retained.

A school may maintain a record in an imaged media format only if the format is capable of reproducing an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document.

Please note that promissory notes that are signed electronically, must be maintained electronically in accordance with the requirements of 34 CFR 668.24(d) (3) (i) through (iv).

Safeguarding electronic records

The Department is making a continuing effort to provide for the increasing use of technology in the administration of the FSA programs. As new regulations are written they will contain instructions for schools that wish to move toward maintaining FSA records in an electronic format.

As institutions begin developing plans for using electronic recordkeeping in administering other FSA programs, they should keep in mind the safeguards required for electronic certification in the FWS program. Those safeguards include:

- password protection,
- password changes at set intervals,
- access revocation for unsuccessful log-ins,
- user identification and entry point tracking,
- random audit surveys with supervisors, and
- security tests of the code access.

Special requirements for SARs and ISIRs

Special maintenance and availability requirements apply for SARs and ISIRs used to determine eligibility. It is essential that these basic eligibility records be available in a consistent, comprehensive, and verifiable format for program review and audit purposes.

Because the SAR is a hard copy document, it must be maintained and available in its original hard copy format or in an imaged media format. The ISIR, an electronic record, must be maintained and available in its original format, i.e., as it was supplied by the Department to the school on a magnetic tape or cartridge, or as it was

archived using EDEExpress software supplied to the school. A school that uses EDEExpress has the ability to preserve the ISIR data that it has maintained during the applicable award year by archiving the data to a disk or other computer format. A school that receives ISIRs on magnetic tapes or cartridges may make a copy of the file received from the Department.

A school is not required to maintain all required records in its financial aid office. For example, it may be more appropriate for a school to maintain some records in the business office, the admissions office, or the office of the registrar. The responsible administrator in the office maintaining the records should be aware of all applicable record retention requirements.

If a school closes, stops providing educational programs, is terminated or suspended from the FSA programs, or undergoes a change in ownership that results in a change of control, it must provide for the retention of required records. It must also provide for access to those records for inspection and copying by the Department. For a school that participates in the FFEL Program, the school must also provide access for the appropriate guaranty agency.

EXAMINATION OF RECORDS

Location

A school must make its records available to the Department at a location of the institution designated by the Department. These records must be readily available for review, including any records of transactions between a school and the financial institution where the school deposits any FSA funds.

Cooperation with agency representatives

A school that participates in any FSA program, and the school's third-party servicers, if any, must cooperate with the agencies and individuals involved in conducting any audit, program review, investigation, or other review authorized by law. This cooperation must be extended to the following individuals and their authorized representatives: an independent auditor; the Secretary of the Department, the Department's Inspector General, and the Comptroller General of the United States. A school must also provide this cooperation to any guaranty agency in whose program the school participates, and to the school's accrediting agency.

Timely access

A school must cooperate by providing timely access to requested records, pertinent books, documents, papers, or computer programs for examination and copying by any of the agents listed above. The records to which timely access must be provided include, but are not

limited to, computerized records and records reflecting transactions with any financial institution with which the school or servicer deposits or has deposited any FSA program funds.

REASONABLE ACCESS TO PERSONNEL

A school must also provide reasonable access to all personnel associated with the school's or servicer's administration of the FSA programs so that any of the agents listed above may obtain relevant information.

A school or servicer has not provided reasonable access to personnel if the school or servicer

- refuses to allow those personnel to supply all relevant information,
- permits interviews with those personnel only if the school's or servicer's management is present, or
- permits interviews with those personnel only if the interviews are tape-recorded by the school or servicer.

FSA RECIPIENT INFORMATION

If requested by the Department, a school or servicer must provide promptly any information the school or servicer has respecting the last known address, full name, telephone number, enrollment information, employer, and employer address of a recipient of FSA program funds who attends or attended the school. A school must also provide this information, upon request, to a lender or guaranty agency in the case of a borrower under the FFEL Program.

Conditions for disclosure under FERPA cite
34 CFR 99.30

Additional Privacy Requirements

The Federal Trade Commission issued a regulation last year that made most colleges subject to the provisions of the Financial Services Act's Security Provisions (also known as the Financial Services Modernization Act). In the regulation, the commission created a definition of financial institutions that includes most colleges on the basis of the financial relationships they have with students, donors, and others. Consequently, colleges must draft detailed policies for handling financial data covered by the law, such as parents' annual income, and must take steps to protect the data from falling into the wrong hands.

DISCLOSING STUDENT INFORMATION

The Family Educational Rights and Privacy Act (FERPA)

To protect the privacy of students and families, federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the FSA programs. The relevant law is the Family Educational Rights and Privacy Act of 1974. Do not confuse FERPA with the Privacy Act of 1974 that governs the records kept by government agencies, including the application records in the federal processing system.

FERPA restrictions on disclosure of records that are created and maintained by campus law enforcement units (for law enforcement purposes) are discussed in chapter 6.

Department regulations set limits on the disclosure of personally identifiable information from school records, define the responsibilities of the school, and define the rights of the student to review the records and request a change to the records. Under FERPA, a school is required to provide a student with an opportunity to inspect and review his or her education records within 45 days of the receipt of a request. A school is required to provide the student with copies of education records, or make other arrangements to provide the student access to the records, if a failure to do so would effectively prevent the student from obtaining access to the records. While the school may not charge a fee for retrieving the records, it may charge a reasonable fee for providing copies of the records, provided that the fee would not prevent access to the records.

The graphic below notes several important elements of the school's responsibilities and the rights of the student. The regulations apply to all education records the school keeps, including admissions records (only if the student was admitted) and academic records as well as any financial aid records pertaining to the student. Therefore, the financial aid office is not usually the office that develops the school's FERPA policy or the notification to students and parents, although it may have some input.

Prior consent not required cite
34 CFR 99.31

Clarification

Prior consent not required

A school may disclose personally identifiable information from an education record of a student without the student's consent if the disclosure is —

- (1) to other school officials, including teachers, within the institution whom the school has determined to have legitimate educational interests; or,
- (2) is (subject to the requirements of 34 CFR 99.34) to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll.

A school is required to —

- ◆ annually notify students (and parents if applicable) of their rights under FERPA;
- ◆ include in that notification the procedure for exercising their rights to inspect and review education records; and
- ◆ maintain a record in a student's file listing to whom personally identifiable information was disclosed and the legitimate interests the parties had in obtaining the information (does not apply to school officials with a legitimate educational interest or to directory information).

A student has the right to —

- ◆ inspect and review any education records pertaining to the student;
- ◆ request an amendment to his/her records; and
- ◆ request a hearing (if the request for an amendment is denied) to challenge the contents of the education records, on the grounds that the records are inaccurate, misleading, or violate the rights of the student.

The term *education record* does **not** include records that are kept in the sole possession of the maker of the record (often called sole possession records). Sole possession records are

1. used as a memory or reference tool,
2. not accessible or revealed to any other person except a temporary substitute for the maker of the record, and
3. typically maintained by the school official unbeknownst to other individuals.

Records that contain information taken directly from a student or that are used to make decisions about the student are not sole possession records.

The FERPA regulations also establish rules governing the disclosure of student information to parties other than the student. The regulation lists a number of conditions under which *personally identifiable information* from a student's education record may be disclosed without the student's prior written consent. Several of these conditions are of particular interest to the financial aid office.

- Disclosure may be made to authorized representatives of the Department of Education engaged in activities designed to measure a participating institution's compliance with FSA laws and regulations. This includes employees of the Department's Office of the Inspector General, employees of the Office of Federal Student Aid, and other federal, state, and local education authorities engaged in compliance or enforcement activities on behalf of the Department.

Clarification

Representatives of the Department also include research firms under contract with the Department to conduct studies of financial aid procedures using student information provided by the schools selected for the study (including the FSA Public Inquiry Contractor (PIC)).

- Disclosure may be made if it is in connection with financial aid that the student has received or applied for. Such a request may only be granted if the student information is needed to determine the amount of the aid, the conditions for the aid, the student's eligibility for the aid, or to enforce the terms or conditions of the aid.
- An educational institution may release personally identifiable information on an F, J, or M nonimmigrant student to the Department of Homeland Security (formally the Immigration and Naturalization Service (INS)) in compliance with the Student Exchange Visitor Information System (SEVIS) program without violating FERPA.

Clarification

- FERPA permits educational agencies and institutions to disclose — without consent or knowledge of the student or parent (if applicable) — personally identifiable information to the Attorney General of the United States or his designee in response to an *ex parte* order in connection with the investigation of a crime of terrorism. An *ex parte* order is an order issued by a court without notice to the adverse party.

When information is supplied to the Attorney General or his designee pursuant to an *ex parte* order, an institution is not required to record the disclosure of information from the student's education record or notify the student. Rather, the school may respond to the specific requirements contained in the *ex parte* order. Moreover, a school that supplies information pursuant to an *ex parte* order is not liable for that disclosure.

- A health and safety exception permits the disclosure of personally identifiable information from a student's record in case of an immediate threat to the health or safety of students or other individuals.
- Generally speaking, FERPA provides parents or eligible students with the right to access, amend, and provide consent for disclosure of education records. Eligible students are those who are at least 18 or who are attending a postsecondary institution. Thus, when a student turns 18 or attends a postsecondary institution, these collective rights under FERPA transfer to the student.

However, the law makes a limited exception for parents of dependent students as defined by the IRS. **Note that the IRS definition of a dependent is quite different from that of a dependent student for FSA purposes.** For IRS purposes, students are dependent if they are listed as dependents on their parent's income tax returns. The limited exception permits a school to disclose education records of an eligible student to parents if that student is a dependent student under the IRS laws. **(If the student is a dependent as defined by the IRS, disclosure may be made to either parent, regardless of which parent claims the student as a dependent).**

Though for students over the age of 18 parents may obtain the student's education records, they do not have the right to amend or provide consent for the release of such records. Those rights pass to the student exclusively when he or she turns 18 or begins attendance at a postsecondary institution.

FERPA and Subpoenas

In contrast to the exceptions to the notification and recordkeeping requirements granted for law enforcement purposes and described in chapter 6, educational agencies or institutions may disclose information pursuant to any other court order or lawfully issued subpoena only if the school makes a reasonable effort to notify the parent or eligible student of the order or subpoena in advance of compliance, so that the parent or eligible student may seek protective action. Additionally, schools must comply with FERPA's recordkeeping requirements under 34 CFR 99.32 when disclosing information pursuant to a standard court order or subpoena.

Disclosure to parents cite
34 CFR 99.31(a)(8)

Clarification

There are two different FERPA provisions concerning the release of records relating to a *crime of violence*. One concerns the release to the *victim* of any *outcome* involving an *alleged* crime of violence (34 CFR 34 CFR 99.31(a)(13)). A separate provision (34 CFR 99.31(a)(14)) permits a postsecondary institution to disclose to anyone the final results of any disciplinary hearing against an alleged perpetrator of a crime of violence where that student was *found in violation* of the institution's rules or policies with respect to such crime or offense.

Disclosure of requests for information

Recordkeeping requirement cite
34 CFR 99.32

Exception to prior disclosure and recordation requirements

Schools are not required to notify a student in advance or keep a record of the disclosure when the request is received in conjunction with ex parte orders and when this is specifically stated in the ex parte order. In addition, schools are not required to notify a student in advance or keep a record of the disclosure made in conjunction with a grand jury subpoena, and other law enforcement subpoenas when this is specifically stated in the subpoena.

Schools are required to keep a record of each request for access and each disclosure of personally identifiable student information. The record must identify the parties who requested the information and their legitimate interest in the information. This record must be maintained in the student's file as long as the educational records themselves are kept. There are some exceptions to this requirement, and you can find them in the FERPA regulations at 34 CFR 99.32(d).

Schools are not required to notify a student in advance or keep a record of the disclosure when the disclosure of education records is made in compliance with subpoenas or court orders issued for certain law enforcement purposes. The waiver of the advance notification requirement applies only when the law enforcement subpoena or court order contains language that specifies that the subpoena or court order should not be disclosed. While 34 CFR 99.32 of the FERPA regulations generally requires that an educational institution maintain a record of all requests for access to and disclosures from education records, such recordation would not be required so long as the school was successful in its attempt to notify the student of a court order or lawfully issued subpoena in advance of compliance.

Clarification

Sample disclosure statement

If student records are requested by Department reviewers in the course of a program review, for instance, the school **must document in each student's file** that the student's records were disclosed to representatives of the Department. The easiest way for the school to do this is to photocopy a statement to this effect and include it in each student's file. A statement such as the following would be appropriate for a review of the FSA programs conducted by a Department regional office.

These financial aid records were disclosed to representatives of the U.S. Department of Education, Region __, on (Month/Day/Year) to determine compliance with financial aid requirements, under 34 CFR Part 99.31(a)(4).

Redisclosure to other authorized parties

When student information has been disclosed to one of the parties listed above, that party may generally not redisclose that information to additional parties, unless the disclosure is made on behalf of the institution and meets one of the conditions listed in 34 CFR 99.31 and the redisclosure is recorded by the institution. However, when a program review finds evidence that a student may have fraudulently obtained aid, this information may be redisclosed to the Department's Office of Inspector General (OIG) under FERPA's authorized representative exception (34 CFR 99.31(a)(3)) and the provision permitting disclosures in connection with financial aid in order to enforce the terms and conditions of the aid (34 CFR 99.31(a)(4)). (Thus, the OIG would not have to make a separate require to the school for the same information.)

When redisclosure is anticipated, the additional parties to whom the information will be disclosed must be included in the record of the original disclosure. For instance, to continue the example for an FSA program review, the following statement might be added: *The School Eligibility Channel may make further disclosures of this information to the Department's Office of Inspector General, and to the U.S. Department of Justice, under 34 CFR 99.33(b).* Schools should check with the program review staff to find out if any redisclosure is anticipated.

As mentioned earlier, the financial aid office is usually not responsible for developing the school's FERPA policy. However, anyone involved in developing a school's policy or anyone who would like a copy of the Department's model notification for postsecondary schools, may review and download the notification from the Family Policy Compliance Office Web site at

www.ed.gov/policy/gen/guid/fpco/index/html

Limitations on redisclosure cite
34 CFR 99.33

Clarification

