

# Data Protections for FAFSA Information

Last Updated: November 26, 2024

## Overview

The [Free Application for Federal Student Aid](#) (FAFSA) is used to determine eligibility for different kinds of financial support that can help make college more affordable. This can include things like the Pell grant, Federal Work Study, loans, scholarships, and state aid. To calculate the amount of aid a student will receive, the FAFSA collects information about the student, their family, and their financial situation.

Information collected as part of the FAFSA is used primarily to determine aid eligibility. However, there are some circumstances in which information might be shared with people and agencies outside of the Department of Education. This document provides an overview of what information is shared, under what circumstances, and what protections are in place for families' personally identifiable information, or PII.

**This guide helps counselors talk with families about whether or not it is safe to fill out the FAFSA.**



## What information does FAFSA collect?

FAFSA collects information about the student, their financial situation, their family, and their parents or legal guardians (if the student is a dependent).

- The **student PII** includes: name, social security number (SSN), date of birth, student loan account information, contact information (including an email address, mailing address, and phone number), driver's license number (if applicable), and financial information.
- The **contributor PII** includes: name, SSN (if applicable), date of birth, contact information (including an email address, mailing address, and phone number), driver's license number (if applicable), and financial information. A PO box can be used as a mailing address.

**Contributors do not need to provide a social security number to fill out their portion of the FAFSA.** When filling out the FAFSA online, they will need to check a box indicating that they do not have an SSN. On the paper FAFSA, they can enter zeroes in the SSN field. **Contributors do not need to complete the identity validation process at this time.**

**Do not use an ITIN in place of an SSN.** Only enter an ITIN where specifically directed to do so.

## Who can access this information?

Individuals at Federal Student Aid and the Department of Education must pass a security clearance in order to access FAFSA information. Employees of the Department of Education must have justification for accessing any PII. Financial aid departments on the student's application list will also have access to some of this information.

## What other agencies have access to FAFSA information?

There must be an explicit agreement in place whenever information is shared across federal agencies. Currently, the Department of Education shares information with the Department of Homeland Security (DHS) to confirm the status of students who apply for FAFSA as [eligible non-citizens](#). There are currently no agreements in place allowing DHS to use information collected as part of the FAFSA for the purposes of immigration enforcement. The Presidents' Alliance is developing a summary of all current data sharing agreements that will be available soon.

## What laws protect FAFSA information?

The use of FAFSA information is governed by the [Privacy Act of 1974](#). The Privacy Act clarifies that PII cannot be disclosed without written consent. There are 12 exceptions to this. Of these 12 exceptions, two are especially relevant when it comes to FAFSA:

1. **“Routine use”**: This allows agencies to share information for a designated set of purposes. These purposes must be published in the Federal Register.
2. **Law enforcement request**: This allows agencies to request information for civil or criminal law enforcement purposes. Such requests must be made in writing by either the agency head or officials at or above the “section chief” level.

FAFSA information is also protected by the Federal Educational Rights and Privacy Act of 1974 (FERPA). You can find more information about FERPA [here](#).

## How will I know if regulations protecting PII change?

If the Department of Education establishes any new data sharing agreements, these will be published in the [System of Records Notices \(SORNs\)](#). The Presidents' Alliance is monitoring all active SORNs and will publish a summary of what data sharing they authorize. This will be kept up to date in the future and will be emailed out to our [FAFSA Updates listserv](#).

## Is the paper FAFSA more secure?

The paper FAFSA is protected by the same policies that apply to the online FAFSA. **The paper FAFSA is neither more nor less secure than the online FAFSA.** There is one main difference to consider. The paper FAFSA does not require contributors to check a box indicating that they do not have an SSN. There is an SSN field on the form, which you can leave blank or fill with zeroes. Contributors will still need to provide some PII, such as a name, mailing address, and financial information.

## Should concerned students apply for a dependency override?

Students should only apply for a dependency override if they qualify. **Whether a student is classified as dependent or independent** is determined by the questions they answer on the form.

For answers to other common questions, visit the [FAQ page](#) on the Higher Ed Immigration Portal [FAFSA Resource Hub](#).