1. Is ASU disclosing de-identified data?  
   - If Yes: Can disclose to anyone  
   - If No: Can disclose to anyone listed in written consent

2. Is ASU disclosing information on a student?  
   - If No: Can disclose to anyone listed in written consent  
   - If Yes: If Yes

3. Is ASU disclosing directory information?  
   - If Yes: Can disclose to anyone listed in written consent  
   - If No: Has student opted out of directory information disclosure

4. Has student consented to disclosure of information?  
   - If Yes: Can disclose to School Official  
   - If No:

5. Is requesting party a school official with a legitimate educational interest (LEI)?  
   - If No: Cannot disclose  
   - If Yes: Does ASU have reason to believe the school official will redisclose the information?

6. Does ASU have reason to believe the school official will redisclose the information?  
   - If No: Cannot disclose  
   - If Yes:  

7. Will school official de-identify the records before redisclosing and before using them for purposes other than original disclosure?  
   - If No: Cannot disclose  
   - If Yes: Has student opted out of directory information disclosure

*Definitions are on back of this document
*Definitions*

**Consent** means a signed, dated, specification of the records that may be disclosed, the purpose of the disclosure, and identification of the party or class of parties to whom the disclosure may be made. Consent cannot be mandatory by ASU in exchange for education or as a prerequisite to apply for admission. Consent can be mandatory by a Corporate Partner or Sponsor in exchange for tuition benefits.

**De-identified Data** means the information contains no personally identifiable information. De-identified Data must not contain any of the following:

1. Student’s name
2. Name of student’s parents/other family members
3. Address of student or student’s parents
4. Personal identifier, such as student’s SSN, student ID, or biometric record
5. Other indirect identifiers, such as student’s DOB, place of birth, mother’s maiden name
6. Other information that is linked/linkable to a student that would allow a reasonable community member to identify the student
7. Information requested by someone the agency reasonably believes knows the student to whom the record relates.

**Directory Information** means any of the following:

1. Student name
2. Addresses: All addresses on record at ASU (e.g., local, home, mailing) and ASU e-mail, including the directory number
3. Telephone numbers
4. Date of birth
5. Degrees, honors, and awards received (including Dean’s List, National Merit, National Achievement, and National Hispanic Scholars)
6. Academic level
7. Academic major
8. College
9. Dates of attendance
10. Enrollment Status (e.g., undergraduate or graduate, full-time or part-time)
11. Participation in officially recognized activities and sports
12. Most recently attended educational institution
13. Weight/height of athletic team members

**School Official** is a third party who acts in place of ASU and has a legitimate educational interest in obtaining the requested information. In order to meet this definition, the party must satisfy ALL of the criteria below:

1. The third party performs a service that ASU would otherwise perform?
2. The third party has an LEI, which means meeting ANY of the criteria below:
   a. The information is needed in order to complete some task in the student’s own legitimate educational interest; OR
   b. Third party needs access in order to fulfill its professional responsibilities for ASU; OR
   c. the task is an employment responsibility or properly assigned subject for requesting party’s determination; OR
   d. the task is consistent with the purpose for which the record is maintained.
3. The third party is under the direct control of ASU with respect to the use and maintenance of education records?
4. The third party will observe FERPA requirements regarding the use and redisclosure of personally identifiable information?

**Student** means an individual who has not been admitted and registered for classes at ASU. Individuals who are taking classes through Open Scale, Earned Admission, or CPE programs and who have not been “formally admitted” and registered for classes at ASU are not Students under FERPA, but ASU treats them as such for purposes of data sharing with a Corporate Partner or Sponsor.