

BOARD OF REGENTS
BRIEFING PAPER
Handbook Revision: Student Directory Information

BACKGROUND & POLICY CONTEXT OF ISSUE:

The iNtegrate project is creating a new need for a re-examination of system policies as the project ties together institutions and their data. Directory information and the right to nondisclosure require systemwide collaboration as the fields stored in the universal ID must be identical and synchronized across all institutions. A student may, under FERPA, choose to limit release of directory information as defined by the institution or in our case, NSHE. A student's decision to "opt out" of directory information initiated at one NSHE institution will for the first time apply to all NSHE institutions. As a result, the directory information choices must be consistent at all NSHE institutions. In addition, changes to FERPA necessitate updating the annual notification to students regarding their rights to restrict the use of their directory information. This amendment of the Board's current policy (*Title 4, Chapter 1, Section 26*) addresses consistency in student directory information, a systemwide "opt out" provision, the definition of "school officials," and the recent FERPA revisions.

SPECIFIC ACTIONS BEING RECOMMENDED OR REQUESTED:

Amend Title 4, Chapter 1, Section 26 to:

1. Make the decision to "opt out" of directory information systemwide at all NSHE institutions and ensure that students are so informed;
2. Make the list of directory information items consistent across all NSHE institutions;
3. Revise the annual notification to students according to FERPA recommendations; and
4. Move the actual notice that must be given to all NSHE students out of the Handbook and into the Policy and Procedures Manual.
5. Make the definition of "school officials" consistent with the definition currently in the Procedures and Guidelines Manual

(See the attached Policy Proposal.)

IMPETUS (WHY NOW?):

The implementation of the iNtegrate software will require a number of changes to Board policy to accommodate functionality and ensure consistency at all NSHE institutions. Directory information is one such change and is being addressed as part of the Peoplesoft implementation.

BULLET POINTS TO SUPPORT REQUEST/RECOMMENDATION:

- The implementation of the iNtegrate software is a systemwide implementation, and decisions and policies need to be revised to bring consistency across all institutions.
- A student's choice to limit his directory information that can be released will now apply and be consistent at all NSHE institutions, an advantage to students who co-enroll or transfer in mid-year.
- Changes to FERPA require the student notification of directory information to be revised.
- The language of the notice to students is best placed in the Procedures and Guidelines Manual.
- Students who are appointed to institution committees or involved in other administrative tasks should be included in the definition of "school officials" for those purposes.

POTENTIAL ARGUMENTS AGAINST THE REQUEST/RECOMMENDATION:

None have been presented.

ALTERNATIVE(S) TO WHAT IS BEING REQUESTED/RECOMMENDED:

Institutions continue to administer directory information nondisclosure requests locally with “opt out” decisions applicable at only that institution and bear the additional cost of a modification to the software.

COMPLIANCE WITH BOARD POLICY:

- Consistent With Current Board Policy: Title #_____ Chapter #_____ Section #_____
- Amends Current Board Policy: *Title 4, Chapter 1, Section 26*
- Amends Current Procedures & Guidelines Manual: *Chapter 6, Section 13*
- Other: _____
- Fiscal Impact: Yes _____ No _____
Explain: _____

POLICY PROPOSAL
TITLE 4, CHAPTER 1, SECTION 26
Disclosure of Student Education Records and Directory Information

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 26. Disclosure of Student Education Records and Directory Information

The Family Educational Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student educational records of both current and former students. Each NSHE institution is required to comply fully with the law. The Act makes a distinction between a student's education record and information classified as directory information. FERPA gives parents certain rights with respect to their children's education records. These rights transfer solely to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are defined as "eligible students" in the Act.

1. Education Records. Institutions must have written permission from the parents or eligible student in order to release any personally identifiable information from a student's education record. However, under certain conditions FERPA allows institutions to disclose those records, without consent, to the following parties or under the following conditions:

- [•]a. School officials¹ with legitimate educational interest²;
- [•]b. Other schools to which a student is transferring;
- [•]c. Specified officials for audit or evaluation purposes;
- [•]d. Appropriate parties in connection with financial aid to a student;
- [•]e. Organizations conducting certain studies for or on behalf of the institution;
- [•]f. Accrediting organizations;
- [•]g. To comply with a judicial order or lawfully issued subpoena, provided that the institution makes a reasonable attempt to notify the student in advance of compliance;
- [•]h. Appropriate officials in cases of health and safety emergencies; and
- [•]i. State and local authorities, within a juvenile justice system, pursuant to specific state law.

¹*The NSHE definition of "school official" is "a person employed by the institution in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the institution has contracted as its agent to provide a service instead of using institutional employees or officials (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks."*

The NSHE definition of a school official is a "a person employed by the University/College in an administrative, supervisory, academic, or support staff position (including law enforcement unit and health staff); a person or company with whom the University/College has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or assisting another school official in performing his or her tasks."

² For NSHE purposes, a school official is determined to have legitimate educational interest if the information requested is necessary for that official to (a) perform appropriate tasks that are specified in his or her position description or by a contract agreement; (b) perform a task related to a student's education; (c) perform a task related to the discipline of a student; (d) provide a service or benefit relating to the student or student's family, such as health care, counseling, job placement, or financial

2. Directory Information. Under the provisions of FERPA, institutions may disclose, without consent, directory information to individuals upon request *for enrolled and former students of the institution only*. *A disclosure of directory information is discretionary on the part of the institution*. [~~NSHE institutions must set a definition for its directory information, which may be more restrictive than provided in FERPA.~~] Directory information is defined in the Act as information contained in an education record of a current or former student which would not generally be considered harmful or an invasion of privacy if disclosed. [~~The Act defines such information as including, but not limited to:~~ *The Nevada System of Higher Education designates the following information as directory information for students:*

- a. *Name;*
- b. *Participation in officially recognized activities and sports;*
- c. *Address;*
- d. *Telephone number;*
- e. *Weight and height of members of athletic teams;*
- f. *E-mail address;*
- g. *Degrees, honors, and awards received;*
- h. *Major field of study;*
- i. *College;*
- j. *Dates of attendance;*
- k. *Date of graduation;*
- l. *Undergraduate or graduate status;*
- m. *Most recent educational agency or institution attended; and*
- n. *Enrollment status (full-time or part-time).*

- ~~Name;~~
- ~~Address;~~
- ~~Telephone [number];~~
- ~~Date and place of birth;~~
- ~~Major field of study;~~
- ~~Participation in officially recognized activities and sports;~~
- ~~Weight and height of members of athletic teams;~~
- ~~Dates of attendance;~~
- ~~Degrees, and awards received; and~~
- ~~Most recent [previous] educational agency or institution attended.]~~

3. Notification Requirements. Each NSHE institution shall annually disclose [~~its~~] *the* definition of directory information in writing and provide a form on which students may elect to be removed from the directory listing under three options. The annual notification and form must be published within the first 5 pages of the institutional catalog and each class schedule. A common statement about the uses of directory information shall be provided on the form.

- a. Privacy Statement. *The Chancellor shall develop a privacy statement that shall be included on the institutional form used by students for requesting the non-disclosure of directory information*. [~~The following statement must appear in boldface type in a box on the form used by students for requesting non-disclosure of directory information. Additional clarifying language may be added to this statement by the institution.~~]

~~[In accordance with institutional policy and the U.S. Family Education Rights and Privacy Act of 1974 (FERPA), the [Name of Institution] vigorously protects the privacy of student education records. The institution does not release private records of individual students, such as grades and class schedules, without prior written consent of the student.~~

~~As permitted under federal law, the sole exception to the above practice is the release of “directory” information considered to be public in nature and not generally deemed to be an invasion of privacy. At [Name of Institution], the following categories are defined as “directory” information: [_____]~~

~~Students have the right to request non-disclosure of directory information. If they do not restrict release of this information, it is probable that the information will be released or disclosed. [Name of Institution] uses directory information for noncommercial, educational purposes, such as to mail notices to students about changes in policies, services, or opportunities. Directory information may also be provided for commercial purposes to businesses affiliated with the institution, honor societies, the alumni association and foundation, or other individuals for purposes that may be beneficial to students. The institution exercises discretion in responding to requests for directory information and may or may not provide such information when requested, depending on the intended purpose of the request. The institution does not sell or rent student information for a fee.~~

~~It is important to consider carefully the potential consequences of restricting the release of directory information. If a student restricts release for non-commercial educational purposes, the institution will be unable to place the student’s name in publications such as honors and graduation programs; to confirm graduation and dates of attendance to potential employers; to verify enrollment with organizations such as insurance companies; or to send notifications about specialized scholarships without the express written authorization of the student.~~

~~If, after due consideration, you wish to restrict the release of directory information, complete this form and submit it to the Office of _____. This directive will apply permanently to your record until you choose to reverse it by submitting a written authorization.]~~

- b. Request for Non-disclosure of Directory Information. Students shall be permitted until the end of the first 6 weeks of the fall or spring semester to submit a ~~written~~ request for non-disclosure of their directory information. The deadline shall be published in the academic calendar of each institution. ***The submission of a request for non-disclosure of directory information at one NSHE institution will apply at all NSHE institutions.*** Students shall be permitted to select one of three non-disclosure options:

- i. Non-disclosure for commercial purposes.
- ii. Non-disclosure for non-commercial (educational) purposes.
- iii. Non-disclosure for both commercial and non-commercial (***educational***) purposes.

“Commercial purposes” is defined as the use of directory information by any person, including, without limitation, a corporation or other business, outside of the NSHE to solicit or provide facilities, goods, or services in exchange for payment of any purchase price, fee, contribution, donation, or other valuable consideration.

Non-commercial educational purposes may include, but are not limited to, placing the student's name in publications such as honors and graduation programs; confirming graduation and dates of attendance to potential employers; verifying enrollment with organizations such as insurance companies; or sending notifications about specialized scholarships without the express written authorization of the student.

- c. Applicability. The request for non-disclosure shall apply permanently to the student's record *at all NSHE institutions* until or unless the student or former student requests [~~in writing~~] to reverse the non-disclosure order.

4. Sale of Directory Information. Student directory information for current and former students cannot be sold or rented for a fee by a NSHE institution.

NSHE Procedures and Guidelines Manual

CHAPTER 6, SECTION 13

Student Directory Information – Non-Disclosure Statement

Additions appear in *boldface italics*; deletions are [~~stricken~~ and bracketed]

Section 13. Student Directory Information – Non-Disclosure Statement

The following statement must appear in boldface type in a box on the form used by students for requesting non-disclosure of student directory information.

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

(1) The right to inspect and review the student's education records within 45 days of the day the institution receives a request for access.

A student should submit to the registrar, dean, head of the academic department, or other appropriate official, a written request that identifies the record(s) the student wishes to inspect. The institution official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the institution official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

(2) The right to request the amendment of the student's education records that the student believes to be inaccurate, misleading, or otherwise in violation of the student's privacy rights under FERPA.

A student who wishes to ask the institution to amend a record should write the institution official responsible for the record, clearly identify the part of the record the student wants changed, and specify why it should be changed.

If the institution decides not to amend the record as requested, the institution will notify the student in writing of the decision and the student's right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

(3) The right to provide written consent before the institution discloses personally identifiable information from the student's education records, except to the extent that FERPA authorizes disclosure without consent.

The institution discloses education records without a student's prior written consent under the FERPA exception for disclosure to school officials with legitimate educational interests. A school official is a person employed by the institution in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the institution has contracted as its agent to provide a service instead of using institutional employees or officials (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks.

A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the institution.

Upon request, the institution also discloses education records without consent to officials of another school in which a student seeks or intends to enroll.

The Nevada System of Higher Education has designated the following information as directory information:

- a. Name;*
- b. Participation in officially recognized activities and sports;*
- c. Address;*
- d. Telephone number;*
- e. Weight and height of members of athletic teams;*
- f. E-mail address;*
- g. Degrees, honors, and awards received;*
- h. Major field of study;*
- i. College;*
- j. Dates of attendance;*
- k. Date of graduation;*
- l. Undergraduate or graduate status;*
- m. Most recent educational agency or institution attended; and*
- n. Enrollment status (full-time or part-time).*

Students have the right to refuse to let NSHE designate this information as directory information and have until the end of the first six weeks of the fall or spring semester to submit a request for non-disclosure of the above items. A request for non-disclosure submitted at one NSHE institution will apply to all NSHE institutions.

(4) The right to file a complaint with the U.S. Department of Education concerning alleged failures by the institution to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

*Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-5901*

University of Nevada, Las Vegas

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Educational Computer Services (ECSI)	Student loan service	This information is for current and former students with outstanding debts.
Nelnet Business Solutions (NBS)	Electronic student billing and payment service	No solicitation of students.
Tuition Management Systems (TMS)	Payment plan services	Information for current and new Students is provided and controlled by Student Accounts office and Student Affairs.
Bank of America	Affinity Credit Card	Current Students are NOT solicited. Solicitations are only sent to alumni of the institution. UNLV Alumni Association approves all content before mailing and controls the distribution of this information by providing the data contained in UNLV's database of alumni to our affinity partner for a one-time use (written agreements in place).
Liberty Mutual	Auto and Home Insurance	Current Students are NOT solicited. Solicitations are only sent to alumni of the institution. UNLV Alumni Association approves all content before mailing and controls

Commercial Entity ¹	Goods or services provided ²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution. ³
		the distribution of this information by providing the data contained in UNLV's database of alumni and donors to our affinity partner for a one-time use (written agreements in place).
Account Control TechNologies (ACT) Collection Agency	Collections of Account Receivables, Tuition, fees,	This information is for current and former students with outstanding debts.
Coast Professional Collection Agency	Collections of Account Receivables, Tuition, fees,	This information is for current and former students with outstanding debts.
Gila Corporation Collection Agency	Collections of Account Receivables, Tuition, fees,	This information is for current and former students with outstanding debts.
Off-Campus Solutions (OCS)	Runs the off-campus vendor program for RebelCard	<u>Current</u> students receive mailings listing the off-campus vendors available. The Registrar provides.
Career Link	Links students via the internet to potential employers	No students are solicited. <u>Current and former students who are alumni members</u> voluntarily go to Career Services and enter their information.
VITA Tax Program	Student information is submitted to the IRS or to various states' tax departments for tax returns	<u>Current</u> students provide their information and sign a waiver authorizing the use of the IRS

Commercial Entity ¹	Goods or services provided ²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution. ³
		Software and transmission to the IRS regional office or the state's office.
Collegiate Concepts Inc.	Provides rental of mini-fridges, safes, etc. to students living in the dorms	Sends <u>current</u> student and parents promotional information. Housing controls the release of information.
Cedar Crestone	iNtegrate consultants sign Confidentiality Agreement forms.	Receives student directory information. iNtegrate controls release of information. No students are solicited.
Various insurance companies	Processing auto accident claims	Police Services is contacted for police reports and release <u>current</u> student names, etc as part of the requested report. Polices Services controls the release of information.
Associated Insurance Plans International, Inc. (AIP)	Processes medical claims for students who have the insurance	AIP sends out promotional materials to <u>current</u> students. AIP receives directory information from Cashiering & Student Accounts.
fasAtlas	Immigration system which sends data to the government	No solicitation of students. Information is distributed from the International Students & Scholars Office.
RIM Solutions	Document imaging for Enrollment & Student Services	No solicitation of students. Information would be distributed from Enrollment & Student

Commercial Entity ¹	Goods or services provided ²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution. ³
		Services.
Hobson's Apply Yourself	On-line application process for students	Students would access via UNLV's website to enter their application information.
Bank RFP for RebelCard (RFP is still in Purchasing)	Will enable those who have bank accounts with the bank to use their RebelCard as a debit card	<u>Current</u> students would be solicited. Information would be from the BlackBoard system and would be controlled by RebelCard.
Sodexo	Campus Dining Services	Communicates/solicits <u>current</u> students via RAVE.
Barnes & Noble Bookstore	Campus Bookstore	Does not solicit students. Does not receive any student directory information.
RuffaloCody	Solicits donations via phone call for UNLV, under contract with the UNLV Foundation.	Gift solicitations may include former students and would be controlled by the UNLV Foundation.

- ¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.
- ². Exclude contracts for internships and clinical education affiliation agreements.
- ³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is "yes", specify if you provided the list to the commercial entity or controlled the distribution yourself.

University of Nevada, Reno

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Bank of America	Credit card services	Yes – Former Students only; Bank of America
GEICO	Insurance	Yes – Former Students only; Geico
GoNEXT (a travel/tour company providing programs exclusively through associations)	Travel programs	Yes – Former Students only; GoNEXT
NCAA	Information on student athletes provided for media guides, academic honors, press releases, NCAA waivers, etc. Students sign waivers that allow for the release of information.	Yes; NCAA

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

Nevada State College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Nevada Credico, Inc	Collection Services	Collection Efforts Only-NSC
General Revenue Corp	Collection Services	Collection Efforts Only-NSC
Coast Professional, Inc	Collection Services	Collection Efforts Only-NSC

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

College of Southern Nevada

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Account Control Technology (ACT)	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Coast Professionals	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Credit Interchange Receivable Management	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Gila Corp.	Collection of outstanding accounts	This information is for current and former students with outstanding debts
NCO Financial	Collection of outstanding accounts	This information is for current and former students with outstanding debts
Educational Computer Services (ECSI)	Student Loan Service	This information is for current and former students with outstanding debts
Follett Bookstores	Campus Bookstore	Current students are not solicited by the vendor. CSN provides to vendor ID number and award amounts of individual students

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Cedar Crestone (I don't think we have an individual contract with them. I think it is NSHE)	iNtegrate consultants sign Confidentiality Agreement forms	Receives student directory information. iNtegrate controls release of information. No students are solicited
National Student Loan Clearinghouse	Provides Student Enrollment Data	Current and former students are not solicited by vendor
NG Websolutions	Provides web-based scholarship application	Current and former students are not solicited by vendor

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is "yes", specify if you provided the list to the commercial entity or controlled the distribution yourself.

Great Basin College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Liberty Mutual	Provides GBC alumni with discounted insurance policies	Yes, once a year, the GBC Foundation Director requests a list of GBC graduates for the past two years. The list is comprised of students who have recently graduated. Some of the students continue in other programs of study. Thus, current students who have already graduated may be solicited. (Written agreement in place.)

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

Truckee Meadows Community College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Herf Jones Photography	Commencement photos	No
Endeavor Software	Voyager Library	No. Students opt-in for library accounts.
12 Horses	Applicant and student in	Yes. Automated TMCC phone message re: enrollment dates, etc. Names provided by TMCC.
Bank of America	Student banking transactions	No. Student and employee information provided by TMCC.
Follett Bookstore	Textbooks, misc.	No. Student completes postcard for any additional service.
Allegra Printing	Print postcards for students	Yes. General info. and recruitment. Names controlled by TMCC.
Alexander Clark	Print postcards for students	Yes. General info. and recruitment. Names controlled by TMCC.
Dyna Graphic Printing	Brochures/schedules	Yes. Names controlled by TMCC.
DigiPrint	Print recruitment pieces	Yes. Recruitment brochures. Names provided by TMCC.

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
GRC, GBE Group, B&P Collection Services	Collection agencies for delinquent accounts receivable	Yes. Names provided by TMCC.
Certified Background	Background checks for Allied Health placement	No

¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.

². Exclude contracts for internships and clinical education affiliation agreements.

³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.

Western Nevada College

Commercial Entity¹	Goods or services provided²	Are CURRENT or FORMER students solicited? If so, specify who controls the distribution.³
Bank of America	Student Banking – electronic transfer of funds (performed at written request of student)	Neither

- ¹. List the commercial entities with which your institution (home institution, alumni association, foundation, athletics, etc.) has an established relationship that in any way involves current or former students. For example, a credit card offered to alumni, a payment plan for fees for current students, collection agencies, student banking transactions, commencement photos, etc.
- ². Exclude contracts for internships and clinical education affiliation agreements.
- ³. For each commercial entity provided, indicate whether solicitations are sent to current or former students. If the answer is “yes”, specify if you provided the list to the commercial entity or controlled the distribution yourself.