Credit Interoperability and Blockchain Solutions

Considerations for Privacy and Security of Student Information

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Webinar Logistics

- Phone lines will be muted during the content portion of the presentation.
- We will have time for questions after each section. Please use the chat window to type your question if you wish.
- The recording of this webinar will be made available on the Department's Student Privacy website: https://studentprivacy.ed.gov/

Agenda of this Presentation

- What is “Reverse Transfer?”
- FERPA and Reverse Transfer
- Consent in facilitating Information Sharing Across a Blockchain Solution
- Use Case and Real-World Implementation
- Can Blockchain Improve Credit Transfer?
- Ongoing Challenges

The Concept of Credit Interoperability – AKA Reverse Transfer

Reverse transfer is the means by which students are awarded associate degrees when transferring from 2-year institutions to four year institutions. Students who make this transfer prior to completing their associate degree will often become eligible for them in the process of obtaining their bachelor's.

The Concept of Reverse Transfer

A student may also be eligible for their associate degree if they transfer to the four year institution but do not complete their coursework and leave the institution. If the student completed enough credits at the four year college, they may be eligible for that associates degree from the community college.

Reverse Transfer in Action

Reverse Transfer in Action

enough edits
for an Associates
Degree!

Requests Consent

Provides Consent

Transfer of Credit Information

FERPA

ALERT!

Questions?

What is FERPA?

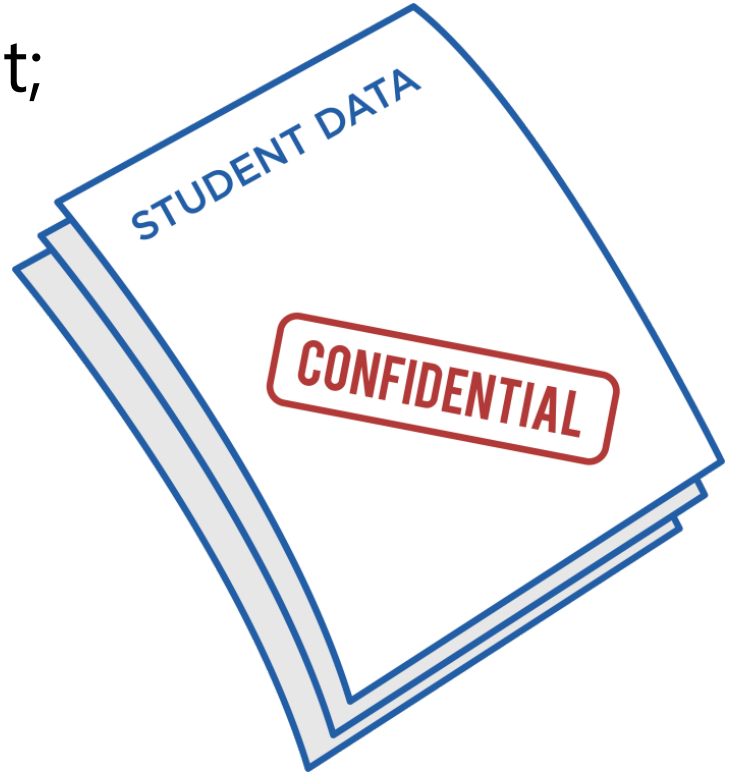
A federal privacy law that affords parents the right to:

- have **access** to their children's **education records**,
- seek to have the records **amended**, and
- **consent** to the **disclosure** of **personally identifiable information** from education records, **except** as provided by law.

Just what is an education record?

"Education records" are records that are:

1. directly related to a student; and
2. maintained by an educational agency or institution or by a party acting for the agency or institution.



Generally, Consent is the Easiest Option

- Reverse Transfer can be accomplished under a number of different methods, but consent is generally the easiest way to facilitate the transfer.
- Certain exceptions generally do **NOT** permit records to be transferred for the purposes of degree verification or award.
- Letter to SUNY explains in more detail.

Exception: Disclosure to officials of another school

- Consent is not required to disclose personally identifiable information from education records to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll, or where the student is already enrolled so long as the disclosure is for the purposes related to the student's enrollment or transfer.

Why this Doesn't Work For Reverse Transfer

- The records would have to flow backward, to a school where the student is no longer enrolled in order to check for eligibility for a degree.

- Consent from the student would be required to have these records disclosed.

Exception: School official

- Schools may disclose PII from education records without consent if the disclosure is to other school officials within the school, including teachers, whom the school has determined to have legitimate educational interest.
- Annual notification of FERPA rights must include criteria for determining who constitutes a school official and what constitutes a legitimate educational interest.

Why this Doesn't Work For Reverse Transfer

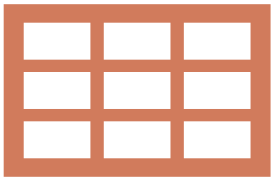
- Even if the colleges are part of the same "State system" they can often be wholly separate entities and be considered (from ED's perspective) to be separate schools.

- Degree completion reviews are another issue entirely though!

Questions?

A Technical Overview of Blockchain

Distributed Peer to Peer Database that stores transactional data



Comprised of "blocks" of data arranged in chronological order like a financial ledger

Each block has a unique fingerprint that is intrinsically tied to all the blocks that came before it

Participating computers each maintain a copy of the blockchain

How can this apply to Reverse Transfer?

Reverse Transfer poses some challenges under FERPA that Blockchain can potentially address:

- FERPA disclosure complications
- Obtaining and verifying consent
- Increasing transparency & accountability
- Enhancing trust in the data

How can this apply to Reverse Transfer?

Obtaining consent under FERPA has its own challenges that blockchain may help to alleviate:

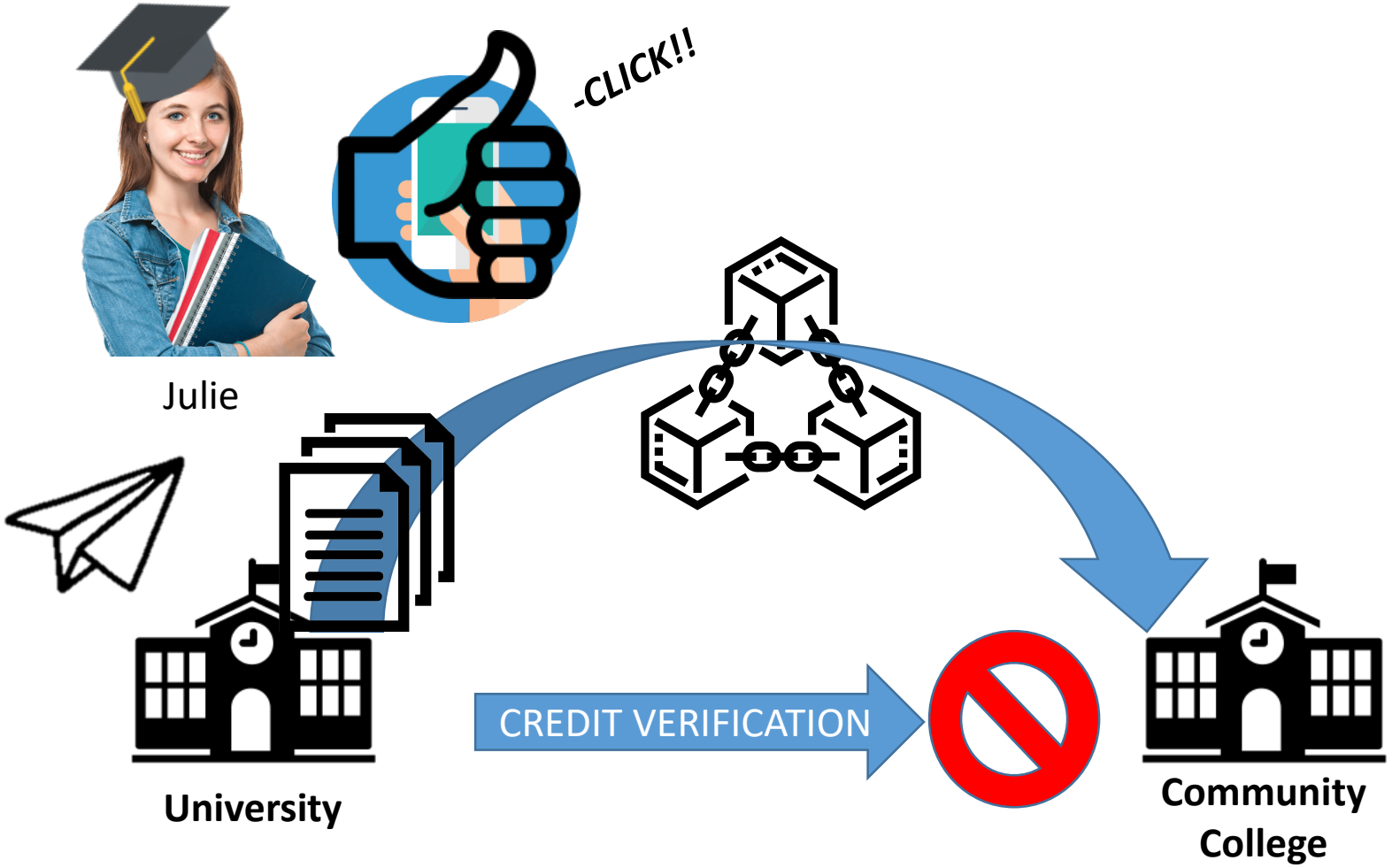
- May not be feasible to fax or mail paperwork
- Consent under FERPA has some "must haves"
- Managing consent over time

How can this apply to Reverse Transfer?

Adopting a blockchain enabled dynamic consent model might:

- Enable schools to obtain real time, verifiable consent
- Provide more agency for students over their education records
- Greater transparency and privacy

Dynamic Consent



Questions?

Next in the PTAC/OET Webinar Series!

Topic: Blockchain implementation in the larger education ecosystem

Date: May 28th

Registration information coming soon!

CONTACT INFORMATION

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