



National Student  
Clearinghouse<sup>®</sup>

# **Directory Block & Privacy FAQs**

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## What is the Privacy Block Setting (PBS) and which legislations does it help my institution comply with?

The Privacy Block Setting (PBS) is a reportable value that your institution can use to communicate to the Clearinghouse that a student's enrollment and/or degree record is restricted from certain uses by the Clearinghouse due to the requirements of a state or federal data privacy law (or, even in some cases, the law of a foreign jurisdiction). With the growing trend in new data privacy legislation – from the European Union's General Data Protection Regulation (GDPR) to California's Consumer Data Privacy Act (CCPA) to future legislation likely to arise in the coming years – the Clearinghouse wants to provide institutions, subject to such laws, with a means by which they can utilize Clearinghouse services in a compliant manner.

## What is the difference between Directory Block Indicator (FERPA) and Privacy Block Setting?

The Privacy Block Setting is separate from the Clearinghouse's long-standing Directory Block Indicator, which is designed to protect student rights under the Family Educational Rights and Privacy Act (FERPA) and ensure FERPA compliance. The PBS is a block that is applied to the *individual* record reported by the institution. The Directory Block Indicator is a block that is applied to the *entire* student's history at an institution.

Due to both the uncertainty of what future privacy legislation might require, as well as the operational complications involved in making the PBS record-specific, the Clearinghouse has chosen at this time to construct the PBS so that it blocks the *entire* enrollment and/or degree record of a student once the PBS is submitted on a single record for that student.

## How do I get started reporting the Privacy Block Setting to the Clearinghouse?

In order to report the Privacy Block Setting to the Clearinghouse, your institution will need to enter a contract addendum with the Clearinghouse governing its use.

The determination of whether records submitted to the Clearinghouse are subject to privacy laws, and any restriction from their use within Clearinghouse services, is a determination your institution needs to make. The Clearinghouse cannot provide legal advice to assist you in making that determination. If you assess that 1) state, federal, and/or foreign privacy laws apply to enrollment and/or degree records you submit to the Clearinghouse and 2) compliance with those laws requires you to communicate with us that a student's enrollment and/or degree record is restricted from certain uses by the Clearinghouse, please contact [schoolops@studentclearinghouse.org](mailto:schoolops@studentclearinghouse.org) before you begin using the PBS.

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## How does the Privacy Block Setting impact the Clearinghouse's products and services?

- **Compliance reporting under Title IV of the federal Higher Education Act:** There will be no impact to compliance reporting due to the PBS value on the student's record.
- **Postsecondary Data Partnership (PDP):** A Privacy Block Setting of 01 (block from research) and 03 (block from research and verifications) will impact the Analysis Ready files sent to participating institutions for their fall and spring data submissions. The next submission window is fall 2020; participating institutions will receive their Analysis Ready files beginning in December 2020. The PDP team are working to ensure the parameters of the Privacy Block Setting are implemented in preparation for that deliverable. As for the PDP platform itself, because the data is de-identified and aggregated, the Privacy Block Setting will have no impact.
- **Verification Services:** The Clearinghouse does not use the student's personally identifiable information in enrollment and/or degree records for its Verification Services (e.g., DegreeVerify, EnrollmentVerify) if the student has not consented to these data uses. Incoming requests without the student's consent receive an "Unable to Confirm" response.
- **Myhub:** The Clearinghouse's Privacy Block Setting will have no impact on student data reflected in Myhub.
- **Course Exchange and Reverse Transfer:** The Clearinghouse's Privacy Block Setting will have no impact on student data in our Course Exchange and Reverse Transfer services.

## Are we required to submit a Privacy Block Setting for each student record?

The Clearinghouse does not require your institution to populate the PBS field for your students. However, depending on the student's request and privacy regulations, you may want to send PBS values for the enrollment and/or degree record you submit to the Clearinghouse. If your institution programs your extract to include the Privacy Block Setting, you can include "00" for students who do not have a block to confirm that there is no PBS on their student records.

If you report the student with a Privacy Block Setting equal to the 00 value (no PBS), you will not be able to report that student with a blank PBS value going forward. We will continue to carry forward the 00 value until such a time as your institution reports a new value (01, 02, or 03) for this student.

## What Privacy Block Setting values can we submit for a student record?

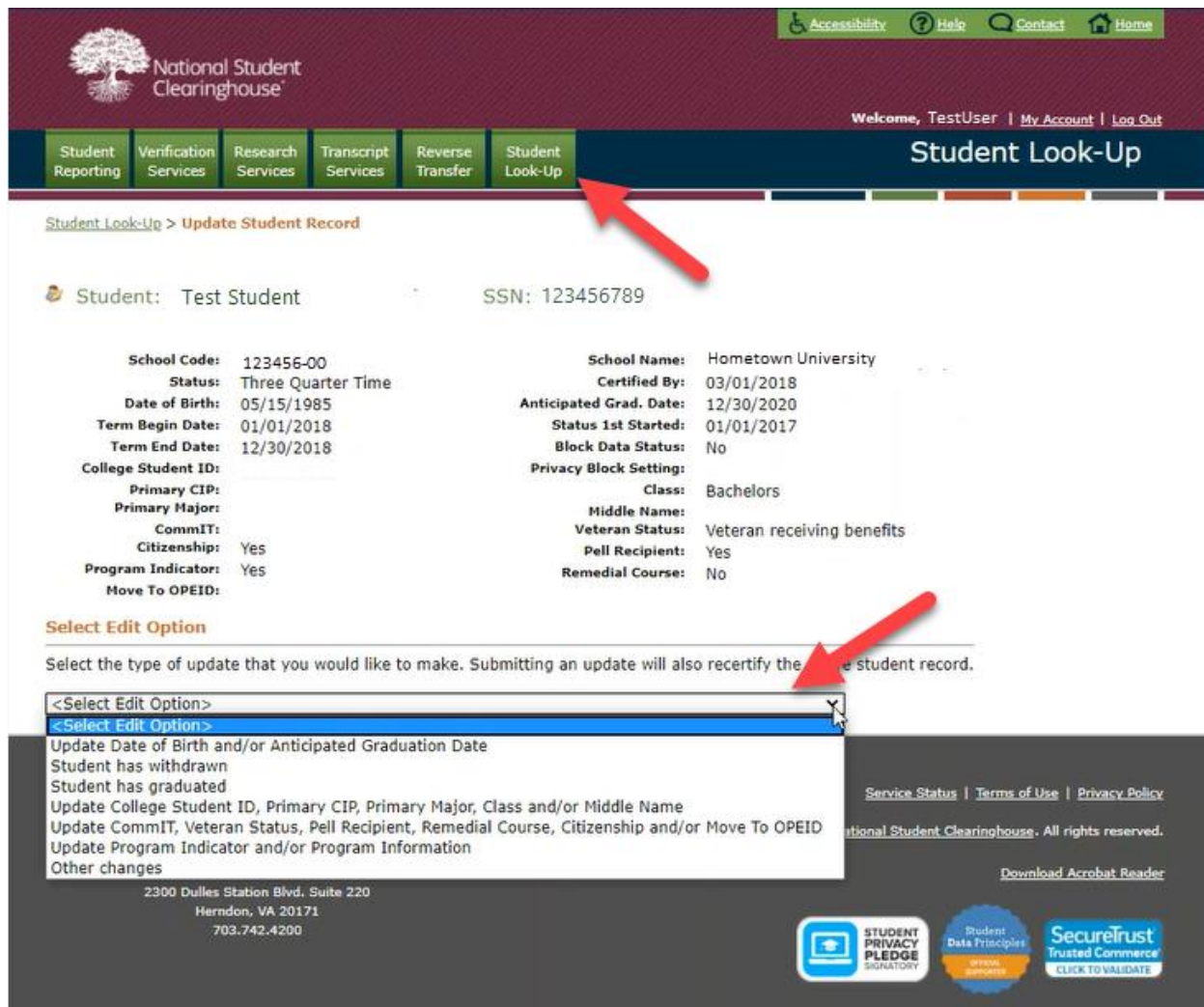
A description of each Privacy Block Setting is provided in the table below.

Setting	Description
<b>Blank</b> (default)	Default value for Privacy Block Setting. A blank PBS means that the student has no Privacy Block Setting and/or your institution has not programmed the Privacy Block Setting for all students. NOTE: Once you populate the privacy block with another value (00-03), it cannot go back to being blank again.
<b>00</b> (no PBS)	Student has no Privacy Block Setting. This is used whenever your institution programs for the Privacy Block Setting values and/or changes from a higher value to no block.
<b>01</b>	Student detail containing Personally Identifiable Information (PII) for which the consent to use has <i>not</i> been received is blocked from use for research purposes. Student data can be used in de-identified and aggregate reports as well as research reports with student consent.
<b>02</b>	Student data blocked from use in non-consented verifications.
<b>03</b>	Student detail containing Personally Identifiable Information (PII) for which the consent to use has <i>not</i> been received is blocked from use for research purposes <i>and</i> in non-consented verifications. Student data can be used in de-identified and aggregate reports as well as both research and verifications with student consent.

## How do we send a Privacy Block Setting to the Clearinghouse?

You can use the [Individual Student Update option](#) on the Student Look-Up tab of our secure site to send us a Privacy Block Setting value.

1. After you log in, click on the “Student Look-Up” tab.
2. Search for the student by entering the Social Security number or College Student ID.
3. Update the PBS by selecting the most relevant “Edit Option” from the drop-down menu (as shown on the following screen shot).



## Can we include the Privacy Block Setting on our enrollment file submissions?

Yes, the Clearinghouse updated the enrollment file layout so institutions can start submitting PBS values via fixed width enrollment file types. You will need to work with either your Student Information System vendor or IT department to ensure they can include the field in the extraction process.

Please refer to the latest [Enrollment Reporting Programming and Testing Guide](#) (version 2.7 and up) for the most recent information on the file layout. NOTE: We do not currently support PBS submission via EDI, delimited or excel formats. If you use any of these file formats, you can submit a PBS for your students online via our [Individual Student Update option](#).

### How can we change the Privacy Block Setting for a student after it is submitted?

Once submitted, the PBS value for a student can be updated online via our [Individual Student Update option](#). If you submitted a block and want to remove it, you should update the PBS value to “00.”

### Are there any new errors or warnings related to the Privacy Block Setting that we should be aware of? If so, how do we resolve them?

An error code 215 will be logged for students who have a privacy block but appear on a file without a block. This error indicates that there is blank PBS value for a student who was previously submitted with a PBS value of 01, 02 or 03.

An error 216 will be logged for students who have an invalid value populated in the PBS field on a submission file.

Please watch the tutorials for Error 215 and Error 216 available at [Enrollment Reporting: Error resolution](#).

### Should we submit a Privacy Block Setting for a student’s degree?

If the student requested a Privacy Block Setting, it is important you continue to submit this value in each submission until the student’s PBS election changes or your institution’s policy dictates otherwise. Student degrees for which data use is restricted should be submitted via the web so you can provide the PBS value. We are working on adding the Privacy Block Setting field to the degree file layout.

### If I have questions about the Privacy Block Setting, what other resources are available?

- [Enrollment Reporting Programming and Testing Guide](#)
- [Enrollment Reporting: An Introduction](#): Please watch the tutorial on “Privacy Block Setting”
- [Enrollment Reporting: Error resolution](#): Please watch the tutorials on “Error 215 – Privacy Block Setting Previously Reported” and “Error 216 – Invalid Privacy Block Setting”