



# Administrative Capability 1.6.1

## Identity Authentication

---

### POLICY STATEMENT

In order to ensure that only authorized individuals gain access to education records, the NSC Office of Financial Aid will follow the procedures detailed in this policy to identify and authenticate the identity of all requesters of such information. This policy applies to transactions conducted between agents of the NSC Office of Financial Aid in person, by telephone and by electronic mail. Separate authentication policies for electronic information systems are maintained by the NSC Office of Information Technology Services.

---

### REASON FOR POLICY

The Family Educational Rights and Privacy Act (FERPA) requires educational agencies and institutions to use reasonable methods to identify and authenticate the identity of parents, students, school officials, and other parties before disclosing or permitting access to personally identifiable information (34 CFR §99.31[c]).

---

### PROCEDURES

The following protocols will be followed by all agents of the NSC Office of Financial Aid in authenticating the identity of any requesters of information contained in an education record, including, but not limited to, financial aid award information. Agents should refer to NSC's FERPA policies to determine which type of information is permitted to be released to various requesters. Depending on the method of inquiry, the agent should follow the appropriate protocol before releasing any information when the identity of requester is not otherwise immediately known to the agent (e.g., an in-person request from an individual who was previously known to the agent).

#### 1. In-person request

- a. Student must provide name and NSHE ID number and must present a student ID or government-issued ID and confirm one of the following:
  - i. preferred email;
  - ii. address;
  - iii. date of birth; or
  - iv. last 4 of SSN
- b. If student is unable to provide NSHE ID number or cannot present a valid student ID or government-issued ID, then the student must confirm two of the following:
  - i. preferred email;
  - ii. address;
  - iii. date of birth; or
  - iv. last 4 of SSN

2. Phone request by student

- a. Student must provide name and NSHE ID number and confirm one of the following:
  - i. preferred email;
  - ii. address;
  - iii. date of birth; or
  - iv. last 4 of SSN
- b. If student is unable to provide NSHE ID number, then the student must confirm two of the following:
  - i. preferred email;
  - ii. address;
  - iii. date of birth; or
  - iv. last 4 of SSN

3. Phone request by parent

- a. Parent must provide student's name and NSHE ID number or SSN and
  - i. FERPA release password, or
  - ii. Parent SSN listed on the FAFSA

4. Email request by student

- a. Should come from the student's preferred email address and include NSHE ID.
  - i. If student is unable to email from their preferred address, they should update their preferred email address in the system before information is exchanged via that address.

5. Email request by parent

- a. Should come from either:
  - i. student's preferred email address;
  - ii. parent's email address from FAFSA; or
  - iii. parent's email address from the FERPA release in PeopleSoft.

## CONTACTS

SUBJECT	CONTACT	PHONE	EMAIL
Primary Contact(s)	Anthony Morrone	702-992-2156	Anthony.morrone@nsc.edu
Subject	Jenna Eastman	702-992-2155	Jenna.eastman@nsc.edu

## DEFINITIONS

**Authentication** is a mechanism used to identify and validate the identity of an individual with the required degree of confidence that the person is who he or she purports to be.

**Education records** are those records that are directly related to a student and maintained by an educational agency or institution, or by a party acting on behalf of the agency or institution. For more information, see the Family Educational Rights and Privacy Act regulations, 34 CFR §99.3.

**Personally identifiable information** includes information that can be used to distinguish or trace an individual's identity either directly or indirectly through linkages with other information. For more information, see the Family Educational Rights and Privacy Act regulations, 34 CFR § 99.3.

---

## HISTORY

Created December 1, 2017