

Compliance Notice



University Compliance Notices provide actionable guidance and general education on University compliance requirements. All employees are responsible to comply with this notice and supervisors are responsible to promote the understanding of this notice and take appropriate actions to comply with it.

Subject: Sharing/posting student information (names, photos, email, field of study, courses, etc.) on department websites or other means.

Purpose: This notice describes how to comply with University policies in regard to sharing/posting student information on department websites and other means.

Details: Departments often share/post graduate and undergraduate student photos and information on their websites and other means (e.g., performance programs/brochures). While this is an effective way to help build a department network and publicize activities and accomplishments, departments must verify the information posted complies with the University FERPA Policy and the Restricted Information Policy.

Student information that falls within the University FERPA Policy's definition of Directory Information (e.g., name, photo, email address, and major field of study) may be disclosed to third parties without the written consent of the student. However, students can restrict the release of Directory Information to third parties by initiating a directory block in the Banner self-service web portal. Student information that does not fall within the definition of Directory Information generally may not be disclosed to third parties without the written consent of the student.

Implications of a student invoking a directory block in Banner include, but are not limited to:

- Student Directory information cannot be posted on a department's website or shared with third parties by other means unless the student has provided prior written consent.
- The student's name and email cannot appear in the public People Directory on the Brown website and Gmail address book.

Departments can check for student directory blocks, also called confidentiality flags, by reviewing either the Concentrators and Grad Students report, or any Class List report, in the Cognos Analytic Reporting Tool.

Additionally, all departments must ensure they do not share/post Brown Restricted Information, as defined by the University Policy on the Handling of Brown Restricted Information, which includes, but is not limited to: addresses, driver's license numbers, passport information and credit card numbers.

For more information on this topic please review the [University FERPA Policy](#) and the [University Policy on the Handling of Brown Restricted Information](#).

Actions/Responsibilities: Each department is responsible for the content of their website and other material that they produce. Therefore, departments are responsible to ensure their website and other mediums only share appropriate student information by:

1. Ensuring all student information that is shared/posted complies with the [University FERPA Policy](#).
2. Verifying a student has not requested a directory block. If a student has a directory block, do not post/share their Directory Information with third parties unless the student provides prior written consent.
3. Ensuring student information posted/shared complies with the [University Policy on the Handling of Brown Restricted Information](#).

Questions:

- For policy specific questions please use the contact information listed in the related policy.
- For questions on the Cognos Analytic Reporting Tool visit the [CIS Service Center](#) or email the [Registrar's Office](#) (registrar@brown.edu).
- For FERPA specific legal questions please contact the [Office of General Counsel](#).
- For general compliance questions please contact [University Compliance](#).