From: LeRoy Rooker <rookerl@aacrao.org>
Sent: Wednesday, June 2, 2021 12:17 PM
To: Mund, Catherine <cmund@usf.edu>
Subject: Re: Florida's Graduate Candidate Identification System (GCIS)

Catherine,

A very interesting email you sent. I reviewed the attachment from the SUS as well as your proposed solutions for moving forward. Your first listed option of having the students opt in to the process could work so long as it is done through each institution's SIS. It would be important to make it an active "opt in" rather than an "opt out." The only time FERPA permits an opt out is with directory information, which limits the type of information that can be disclose. Disclosing items such as GPA, race, and gender would generally require a signed consent from the student. However, by doing the opt in through the SIS, the required pin or password could serve as an electronic consent. You would need to be sure to note the non directory items, listed above, that would be included on those students who did opt in to the disclosure.

Concerning the second listed option, this one would not work under FERPA unless the disclosures were limited only to each institution's permitted directory information items. As such, GPA, race, and gender could not be included in the disclosures.

I hope this is helpful in answering your questions on how FERPA would apply in this undertaking.

All the best,

LeRoy Rooker
AACRAO Senior Fellow
Director of Department of Education Family Policy Compliance Office (FPCO)
National Leading Authority on FERPA

On 6/1/2021 12:43 PM, Fund, Catherine wrote:

Hi Leroy!

I hope you're well. I am emailing you on behalf of the State University System Registrars of Florida for your guidance on this issue below. Specifically, are you aware of any other States that may have set up something similar that we can look to our borrow from as a best practice?

Background: The GCIS used to be a file that we were required to send to the Florida Board of Governors (BOG) to create a joint file of student information to use to recruit from for graduate program recruitment across the State University System institutions of Florida. Attached, you will see the file layout. Because this was a required State report, we had no FERPA concern.

The BOG has decided not to support this file share anymore, so the SUS institutions have gotten together to see how we can continue this partnership. As usual, the registrars raised significant FERPA concerns.

While we're all individually consulting our General Counsels, my registrar friends asked that we reach out to you as well. Here's what I'm thinking:

1. If home institution sends an email to all graduating students with an opportunity to opt in to this process, there would be no FERPA concern. (However, the eligible population of students would be much smaller.)
2. We could all add this to our Student Record Policies as an exception; assuming then that we would exclude any student who has asked for additional privacy on their student record.

Would appreciate your thoughts on this; can you see any other solutions to this need?

Thank you,
Catherine

Catherine Mund
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From: Rebecca Augustyniak <raugustyniak@admin.fsu.edu>
Sent: Monday, March 29, 2021 2:34 PM
To: Kim Barber <kabarber@fsu.edu>; bhodge@fau.edu; agatha.onwunli@famu.edu; bscholten@ncf.edu; dgrayckowski@floridapoly.edu; dubeltra@fiu.edu; clearch@unf.edu; Mund, Catherine <cmund@usf.edu>; csaxby@fgcu.edu; bcboyd@mail.ucf.edu; lwilson2@uwf.edu; Pritz, Steve <spritz@ufl.edu>; akonapelsky@floridapoly.edu
Cc: Amy Finley <afinley@fsu.edu>; Blair Monroe <bmonroe@admin.fsu.edu>; Jarrett Terry <jlterry@fsu.edu>
Subject: Florida's Graduate Candidate Identification System (GCIS)

Dear Registrars:

The purpose of this message is to engage you and your campus in determining the future direction and governance of Florida's Graduate Candidate Identification System (GCIS). GCIS was developed by the Florida Board of Governors' Graduate Admissions Task Force two decades ago as a means for universities to identify potential graduate students from the pool of juniors and seniors in the State University System (SUS). Task force members felt that such a database could be a valuable tool in enhancing diversity in graduate programs, creating a pipeline to graduate education, and encouraging high-caliber students to remain in Florida for their graduate education. They also believed that a database could make recruitment of all students more efficient and effective.

The State University System (SUS) Board of Governors has provided governance for GCIS and the application and database have been managed by the Center for Information Management and Educational Services (CIMES) at FSU since the inception of the GCIS. In 2019, the BOG determined they no longer had the budget to support the application and they asked CIMES to continue with the system hosting and maintenance. (Attached is a document developed by the BOG that provides information about the following: history of GCIS, CIMES, database features and operating procedures, security measures, formatting of data, and data dictionary. It also includes a privacy form.)

I recently met with representatives from all the SUS universities about how to provide governance for GCIS moving forward. The most favorable solution is to create a GCIS Governance Committee comprised of two representatives from each university: the individual responsible for maintaining the integrity of all student data (typically the University Registrar or assignee), and 2) a campus individual well versed in utilizing GCIS and the data for graduate recruitment. The latter could be a director or coordinator of graduate recruitment, Graduate School personnel, an admissions representative, or other university appropriate employee. I have asked the university Registrars to assist in identifying these two representatives.

This committee will be responsible for reviewing the current system and security and developing rules for system usage and maintenance and for how the committee will operate. Please provide the two designees for your university by April 12.

Best regards,
Rebecca

Rebecca Augustyniak |Executive Director | 850.339.7323 | cimes.fsu.edu

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