

Illinois Student Assistance Commission
GAP Access Data Security and Data Protections Annual Review

The Illinois Student Assistance Commission (ISAC) has strict security and confidentiality policies and procedures in place to protect the integrity of student records. ISAC will share and receive applicant or recipient information with approved partner educational institutions for the purposes of administering student financial aid, subject to restrictions regarding data confidentiality, use and security. [(110 ILCS 947/70(g)) (23 IL Admin Code 2700.55)].

ISAC Gift Assistance Programs Access (GAP Access) is the portal through which online interactions for the purpose of data inquiries and submissions, eligibility announcements and payment requests for ISAC-administered programs are conducted. ISAC File Transfer System is used by participating institutions to send and receive files. GAP Access portal and ISAC File Transfer System contains personally identifiable information and care must be taken by partner institutions to protect the access and use of this information.

Annually, ISAC will require all GAP users to review and endorse ISAC’s data security and protection policies and procedures, as outlined in ISAC Administrative Rules, PART 2700 – General Provisions: Section 2700.55 Use, Security and Confidentiality of Information, as well as Further GAP Access Guidance to protect access to the portal.
23 IL Admin Code 2700.55

The personally identifiable information of an ISAC program applicant, participant or anyone named in any materials related to program participation, or personally identifiable information of an individual that ISAC accesses, receives or maintains in relation to its research or other activities, is considered confidential personal information and shall be governed by applicable State and federal privacy laws.

All educational institutions, lenders, holders, servicers and other entities participating in ISAC-administered programs or activities shall be expected to know and comply with all applicable federal and State laws that govern the privacy, use, access and security of the confidential information. (See, e.g., the Data Processing Confidentiality Act [30 ILCS 585], the Family Educational Rights and Privacy Act of 1974 (20 USC 1232g), the Identity Protection Act [5 ILCS 179] and the Gramm-Leach-Bliley Act (15 USC 6801-6809).

The confidential information shall not be sold or used, shared or accessed for any purpose other than that which is directly related to the purpose for which the confidential information was provided to the participating entity. Participating entities shall be responsible for implementing appropriate security procedures to protect the integrity of the confidential information when accessed, stored, transmitted or received.

FURTHER GAP ACCESS GUIDANCE

ISAC requires that a Primary Administrator (FA Director, High School Principal, or authorized facility staff member) is named for each institution to review and authorize GAP Access users

and determine user privileges. The GAP Access Administrator will ultimately be responsible for monitoring passwords, staff access, and security for a variety of ISAC programs. All GAP Access users need a valid GAP Access ID and password, and all will be required to use a 2-factor authentication security measure to gain access to the portal.

If you have any questions regarding these GAP Access Data Security and Data Protections 2025 Annual Agreement, **please contact**.

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8 a.m. - 4:30 p.m., CST