

SECTION 3, COMPREHENSIVE STANDARD 3.4.11

The institution protects the security, confidentiality, and integrity of its student academic records and maintains special security measures to protect and back up data.

JUDGMENT OF COMPLIANCE

Compliant

Partially Compliant

Noncompliant

RATIONALE FOR JUDGMENT OF COMPLIANCE

Through application of policies developed by the institution and by the Board of Regents, and in accordance with the Family Educational Rights and Privacy Act of 1974 (FERPA), North Georgia College & State University safeguards its student academic records.

The Board of Regents is committed to protecting the privacy of confidential information (*BOR Academic Affairs Handbook*, Section 3.10 [1] and BOR Business Procedures Manual [2]); NGCSU affirms and supports this commitment. Though the institution collects student social security numbers as permanent identifiers, these numbers are not used to access student academic information, but rather computer-generated identification numbers.

Disclosure of information from student education records requires written consent of the student except in certain stipulated circumstances. The terms under which student records may be disclosed are outlined in the *NGCSU 2005-2006 Student Handbook & Calendar* (p. 38) [3, p. 40]; FERPA guidelines, detailing to whom student education records may be released, are available on the Registrar's web pages [4]. The *NGCSU Faculty Handbook*, Section 5.19 [5] also states the University's commitment to privacy of student educational records, emphasizing that student records are not to be released to unauthorized individuals. Finally, *NGCSU's Computer and Network Usage Policy*, Sec. 2.2 [6] stipulates that access to information requires specific authorization from the department responsible for the information.

The institution has enacted policies for the purpose of restricting access to student academic records to those with a need to know. Access to the

database containing student records is controlled by userid and password; currently proposed are mechanisms to evaluate individuals' access roles annually or more often and to adjust or remove access rights for individuals who have changed positions within the university or left the university. For more information pertaining to the creation and maintenance of accounts please refer to *Enterprise Application Account Creation and Maintenance Policy* [7].

In its *Computer and Network Usage Policy, Sec. 6.1* [8], NGCSU has assigned student academic records to the data classification "private sensitive data." According to the policy, such data "must be kept on centrally supported servers." If transferred over the network, the data must be encrypted. While information of this sort may be stored temporarily on workstation computers, it must be protected from unauthorized access, and if printed, must be shredded when it has served the intended purpose. The policy *Safeguarding Confidential Information* [9] covers all state- and federal-compliant data sets including, but not limited to, FERPA and GLBA. Student academic data are stored on the Banner Database Server, which is backed up onto tape daily. The manual for backup and recovery of data is stored in a fireproof safe in the server room (see *NGCSU Information Security Plan*, pp. 34-35 [10]). The institution has specified procedures to ensure physical security of the server room and remote tape storage sites (see "Information Security Management Plan," *NGCSU Security Plan*, pp. 160-162 [11]).

Physical student academic records are stored in the vault in the Registrar's Office. The vault is open during normal business hours, when the office is staffed, and access to the vault is restricted to authorized personnel.

Document Reference:

Number	DB Num	Document Title	Resource
1		Board of Regents Academic Affairs Handbook, Section 3.10, Social Security Number	http://www.usg.edu/academics/handbook/section3/301-310/301-310.phtml#3.10
2		Board of Regents Business Procedures Manual	http://www.usg.edu/fiscal_affairs/bpm_acct/bpm-sect12.pdf
3		NGCSU 2005-2006 Student Handbook & Calendar, Access to Student Records	http://www.ngcsu.edu/Stu_Lif/Handbook/2005_06_handbook.pdf , p. 40 in PDF, p. 38 in hard copy.
4		Office of the Registrar: Family Educational Rights	http://www.ngcsu.edu/enrollment/registrar/ferpa.shtml

Number	DB Num	Document Title	Resource
		and Privacy Act	
5		NGCSU Faculty Handbook	http://www.ngcsu.edu/VPAA/Fcltybk/chapter5.htm#5.19
6		NGCSU Computer and Network Usage Policy	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/usage.htm#authorizedusers
7		Enterprise Application Account Creation and Maintenance	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/AccountCreation1301.pdf
8		NGCSU Computer and Network Usage Policy	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/usage.htm#securityprocedures
9		Safeguarding Confidential Information	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/SafeguardingConfidential.pdf
10		NGCSU Information Security Plan	http://www.ngcsu.edu/sacs/Reference_Room/documents/NGCSU_documents/NGCSU_Security_Plan_12-27-2004.pdf , pp. 34-35 in PDF.
11		NGCSU Information Security Management Plan	http://www.ngcsu.edu/sacs/Reference_Room/documents/NGCSU_documents/NGCSU_Security_Plan_12-27-2004.pdf , pp. 160-162 in PDF.