

SECTION 3, COMPREHENSIVE STANDARD 3.9.2

The institution protects the security, confidentiality, and integrity of its student records.

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, North Georgia College & State University safeguards its student records.

North Georgia College & State University recognizes the confidential nature of the student information that it collects and maintains. In accordance with the *Family Educational Rights and Privacy Act of 1974*, students are notified annually of the types of records that are maintained and custodians for each type of record. Information concerning the types of records as well as policies concerning access, disclosure, and correction of records is provided in the *NGCSU 2005-2006 Student Handbook & Calendar*; (pp. 38 - 41 of the print document) [[1](#), pp. 40 - 43]; FERPA guidelines are available on the Registrar's web pages [[2](#)]. The *NGCSU Faculty Handbook*, Section 5.19 [[3](#)] also states the University's commitment to privacy of student records. Finally, *NGCSU's Computer and Network Usage Policy*, Sec. 2.2 [[4](#)], 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* [[5](#)].

Individual departments have established policies for record retention and confidentiality that are consistent with the Regents record retention policies.

In its *Computer and Network Usage Policy, Sec. 6.1* [6], 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* [7] covers all state and federal compliant data sets including, but not limited to, FERPA and GLBA. Student academic data is stored on the Banner Database Server, which is backed up onto tape daily, with thirty daily tapes and one monthly tape. The manual for backup and recovery of data is stored in a fireproof safe in the server room (see *NGCSU Security Plan*, pp. 33-35 [8]). 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 [9]).

Other student data is also stored on the Banner Database Server, which is backed up onto tape daily, with thirty daily tapes and one monthly tape. The manual for backup and recovery of data is stored in a fireproof safe in the server room (see *NGCSU Security Plan*, pp. 33-35 [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]).

To assist in protecting the confidentiality of student records, the university has discontinued the use of students’ Social Security Number as the primary identifying key in the Banner Database. A unique student identification number [12] is now assigned to all students. Students may also elect to restrict access of their directory information by submitting a written request to the Registrar’s Office.

Physical student records are maintained in locked filing cabinets in designated student affairs offices. Access to files is restricted to authorized personnel.

Document Reference:

Number	DB Num	Document Title	Resource
1		NGCSU Student Handbook & Calendar, 2005-2006	http://www.ngcsu.edu/Stu_Lif/Handbook/2005_06_handbook.pdf , pp. 40 – 43 in PDF, pp. 38-41 in hard copy.
2		Office of the Registrar: Family Educational Rights and Privacy Act	http://www.ngcsu.edu/enrollment/registrar/ferpa.shtml
3		NGCSU Faculty Handbook	http://www.ngcsu.edu/VPAA/Fcltybk/chapter5.htm#5.19
4		NGCSU Computer and Network Usage Policy	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/usage.htm#authorizedusers
5		Enterprise Application Account Creation and Maintenance	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/AccountCreation1301.pdf
6		NGCSU Computer and Network Usage Policy	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/usage.htm#securityprocedures
7		Safeguarding Confidential Information	http://www.ngcsu.edu/Adminsrv/Infotech/usage_policy/SafeguardingConfidential.pdf
8, 10		NGCSU Security Plan	http://www.ngcsu.edu/sacs/Reference_Room/documents/NGCSU_documents/NGCSU_Security_Plan_12-27-2004.pdf , pp. 33-35 in PDF.
9, 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.
12		NGCSU Information Technology, NgcsuID	http://www.ngcsu.edu/adminsrv/infotech/ngcsuid/index.htm