

3.9.2 The institution protects the security, confidentiality, and integrity of its student records and maintains security measures to protect and back up data. **(Student records)**

Compliance Partial Compliance Non-Compliance

Narrative:

Chattahoochee Valley Community College (CVCC) protects the security, confidentiality, and integrity of student records and maintains special security measures to protect and back up data.

Security

Student Records are any permanent hard copy or electronic format records, created to assist the divisions of Student Services with regard to potential, existing and previous students. Student records are maintained by the offices of Admissions, Financial Aid and Business Services. Permanent hard copy records, those kept in perpetuity, are maintained in a locked vault with assigned keys to limited personnel. The software utilized by administrative staff has established security [policies](#) and processes to ensure protection of student electronic format records. Record retention is maintained according to State Board Policy [214.01](#).

Student electronic format records are restricted by departmentalized, coded-access. In addition, all personnel require a unique password to access the mainframe where electronic student records are maintained. The mainframe allows the Information Systems Coordinator to set parameters on use of passwords and monitor all user activity to enhance the College's security measures. Also, the proxy network server utilized by the College forms a barrier between the College's network and the Internet, allowing only regulated network traffic in or out.

Confidentiality

The Office of Admissions maintains permanent student records. As noted in the [College Catalog and Student Handbook](#), official and unofficial copies of student educational records are not released without the expressed written consent of the student, written request in the form of a court order, and/or provisional exceptions as outlined in the [Family Educational Rights and Privacy Act of 1974 \(FERPA\)](#) and State Board Policy [809.01](#). Other conditions excepting the release of student record information without student consent are as follows:

1. To college officials for legitimate education purposes,
2. To accrediting organizations to perform their accrediting functions,
3. To parents of a student if the parent(s) claim the student as a dependent and proof of dependency is furnished, or
4. Proof of Power of Attorney is presented.

Authorization is a written request bearing the signature of the student. Electronic signatures are not accepted as proper authorization. Student permanent records held by the College are accessible to students when requested. However, students may not remove or reproduce any permanent record content(s) unless formally [challenged](#). Additionally, students may view permanent records only in the presence of Admissions personnel or authorized parties. All Admissions personnel and authorized parties must sign a confidentiality agreement on file in the Office of Human Resources and the Office of the Director of Admissions/Registrar. Further, the Financial Aid and Business Office personnel are required to sign [confidentiality agreements](#), which are also maintained in the Office of Human Resources. Assessments and related information received on students with disabilities and special needs are confidentially

maintained by the Director of Student Development/Student ADA Coordinator.

In order to ensure that new faculty and staff members are aware of regulations related to FERPA, this information is covered by the Dean of Student Services during [New Employee Orientation](#). Every new employee must participate in this orientation within six months of their date of hire. Also, although information on FERPA is provided to students in the *College Catalog and Student Handbook*, which is also available on the website, it was determined that this needs to be included in New Student Experience as well. With the revamping of this activity in Fall of 2012, facts related to FERPA will now be covered with new students as a part of the Dean of Student Services presentation as well. The first New Student Experience to include FERPA will occur in the Spring 2013 semester.

Integrity

Permanent records of students who anticipate enrollment in a given semester are manually reviewed following said semester for completeness and accuracy. In addition, student records missing required information/documentation when the student was enrolled for the semester will be placed on hold until the required information/documentation is received. All permanent records not archived are manually verified for accuracy and completeness every ten years. Prospective students' files with absolute inactivity are purged every three years. Any inconsistencies with regard to student electronic format records are verified against the permanent hard copy record for resolution. Also, changes made to a student's record require a written request bearing the student's signature.

Security Measures and Backups

The College uses an IBM System i5 to store software and data primarily in what is known as libraries. However, it does store some data within its own network file system known as directories. These libraries and directories are backed up locally on a weekly basis. In addition, each night, all of the data is encrypted and backed up off site to a tier 4 data center located in Baton Rouge, LA.

The IBM i5 operating system is considered to be one of the most secure Network Operation Systems in the world. In addition, it sits behind a Sonicwall 2040 Pro Firewall with traffic restricted to authorized personnel.

SUPPORT DOCUMENTATION
Information Technology Policies
State Board Policy 214.01: Records: State Records Commission
College Catalog and Student Handbook, Records – Page 43
Family Educational Rights and Privacy Act (FERPA) of 1974
State Board Policy 809.01: Student Records – General
College Catalog and Student Handbook, Confidentiality – Page 231
Confidentiality Agreement
New Employee Orientation Presentation – FERPA