

## 3.9.2

### Student Affairs and Services: Student records

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

#### Judgment

Compliance    Partial Compliance    Non-Compliance    Not Applicable

#### Narrative

Tennessee Technological University (TTU) protects the security, confidentiality, and integrity of student records as required by Tennessee Board of Regents Policies 3:02:03:00 [1] and 3:02:04:00 [2] and TTU Policy 265 Confidentiality of Student Records and FERPA Compliance [3]. Information on the student's right to privacy regarding educational records is available online on the Policy Central website [3], in the Student Handbook [4] and on the office of the Registrar's website [5]. The office of the Registrar provides an online tutorial regarding FERPA policies [6] and also includes FERPA information in its new faculty orientation [7].

#### Record Storage and Policies

TTU gathers, stores, and maintains a variety of information related to students as part of its mission including, but not limited to

- Directory information such as the student's name, address, telephone listing, date and place of birth, major field of study, participation in officially recognized activities and sports, weight and height of members of athletic teams, dates of attendance, degrees and awards received, digitized Eagle Card photo, and the most recent previous educational agency or institution attended by the student
- Admissions and enrollment data, including withdrawals, grades, retention, and academic standing
- Transcripts
- Financial aid documents
- Payment and disbursement records
- Student disciplinary records
- Student housing records
- Medical and mental health records
- Student employment records
- Research approvals and documents
- Student advisement records
- Documentation of student performance in field experiences, internships, externships, and co-operative work experiences

Other academic records (such as student advisement forms, comprehensive examinations, etc.) are kept in the respective colleges, schools, and/or departments. Non-academic records not kept in the office of the Registrar may be found in the following offices: Dean of Students (disciplinary records), Counseling Center, Financial Aid, Health Services, Disability Services, and Residential Life.

The University maintains policies related to accessibility, storage, and emergency recovery contingencies for student records in accordance with federal and state laws and regulations [8]. These policies and supporting controls apply to both physical (e.g., paper) and electronic records. Security and integrity controls that have been implemented include, but are not limited to

- Physical data security relating specifically to electronic records include hosting data in a secured data center with limited physical access and environmental controls.
- Secure data transmission between systems as well as secure data storage. The University has implemented encrypted storage and communication technologies for all systems that store or process student records. This ensures that only authorized systems and users can access student records.
- Select medical and mental health records kept by Health Services are subject to the provisions of the Health Insurance and Portability and Accountability Act (HIPAA).
- Students are afforded the right to restrict disclosure of directory information each semester when registering for courses via a form available from the office of the Registrar.
- Paper records are kept in locked, secure file systems.
- Computers and student records access is managed via Role Based Access Controls (RBAC) that assign access based on least privileged security principles per TTU Policy 802 Access Control.
- Electronic portable storage media, such as discs or detachable drives, are kept in secured locations and governed by University records security policies and protocols.
- Outgoing emails include confidentiality statements.
- Annual state audits of the TTU office of the Registrar help to ensure security and integrity of records.
- The TTU office of Internal Audit conducts institution-wide monitoring of compliance with policies related to the security and integrity of records [9].
- Papers and other ephemera containing protected information are disposed of via secure receptacles serviced by the Cintas company under contract to TTU. Cintas personnel later shred these materials under secure conditions.
- To ensure data availability in the event of a disaster, TTU systems hosting critical student data and TTU's authentication systems are securely replicated and electronically transferred continuously to an offsite co-location hosted by neighboring Middle Tennessee State University. This approach reduces the recovery time of critical systems. Redundant databases are maintained as warm standbys via log shipping at 15-minute intervals while servers hosting critical applications can be recovered in less than 60 minutes. Co-location systems are accessible only to authorized individuals.

University administration periodically informs and reminds administrators, faculty, and staff of policies regarding the security of student records and notifies them of any changes.

## Conclusion

The university maintains policies and practices protecting the security, confidentiality, and integrity of student records in compliance with state and federal laws, rules, and guidelines. Documentation confirms that TTU is in compliance with Comprehensive Standard 3.9.2.

## Sources

-  [1] TBR Policy Confidentiality of Student Records\_3\_02\_03\_00
-  [2] TBR Policy Student Rights and Freedoms\_3\_02\_04\_00
-  [3] Policy 265 Confidentiality of Student Records and FERPA Compliance
-  [4] Privacy Rights of Students
-  [5] FERPA Notice\_Office of the Registrar
-  [6] FERPA for Faculty\_Office of the Registrar
-  [7] New Tenure-Track Faculty Orientation Schedule
-  [8] Information Technology Policies\_Policy Central

