# Section 12.5 Student records

The institution protects the security, confidentiality, and integrity of its student records and maintains security measures to protect and back up data. The institution also ensures that independent contractors or agents that have access to or maintain student records are governed by the same principles and policies as institutional employees.

Compliance Non-Compliance Partial Compliance

Narrative:

Florida Gulf Coast University (FGCU) enforces policies and procedures to safeguard the security, confidentiality, and integrity of its student records. Most broadly, FGCU Policy [3.006](./evidences/FGCUPolicy3.006EducationRecords.pdf): Educational Records Policy establishes FGCU's position on the release of students' educational information. The University will not release or permit access to educational records and personally identifiable information on a student except as otherwise permitted by law. The policy defines practices for protecting directory information, nondisclosure, and requirements for the request of student information.

##### Types of Records Stored

[Records and Registration](./evidences/DepartmentofRecordsRegistrationwebpage.pdf) oversees the maintenance of student records through the use of the student information system which at FGCU is Ellucian Banner. Any physical educational records are stored in secure storage in accordance with best practice and digitized as part of the regular business practice. The educational records kept by Records and Registration are academic in nature and may include all or any of the following: application for admission, transcripts, test scores, third party access forms, change of address forms and residency affidavits.

##### Policies and Procedures

Providing a computing and networking environment that ensures the security, integrity, and confidentiality of student records is the responsibility of Information Technology Services (ITS) in the Division of Administrative Services and Finance. In collaboration with the University's office of General Counsel, ITS has drafted specific policies regarding confidentiality and security protection, including FGCU's University Technology Resources Policy [3.022](./evidences/policy3.022.pdf) and FGCU Policy 3.042 [Restricted Data.](./evidences/Policy3042RestrictedData.pdf) FGCU's policies and procedures were developed in accordance with guidelines established by the American Association of Collegiate Registrars and Admissions Officers (AACRAO); the Family Educational Rights and Privacy Act ([FERPA](./evidences/StudentRightsFERPAPolicieswebpage.pdf)), as outlined by the U.S. Department of Education's Family Policy Compliance Office; and Florida statutes ([1006.52](./evidences/FS1006.52Educationrecords.pdf), [119.01](./evidences/FS119.01PublicRecords.pdf), [1002.22](./evidences/FS1002.22EducationRecordsK12.pdf)) guidelines, and general provisions concerning educational records and access to those records.

Each unit (school, college, institute, center, or division) of the FGCU community that has access to student records is responsible for adhering to all related federal, state, and local laws, and FGCU rules, regulations, and policies. Because these laws and policies are subject to amendment and change, the units must ensure that their understanding remains current. The implementation and enforcement of FGCU's policies and procedures are coordinated by Academic Affairs, the Office of General Counsel, and the Division of Administrative Services and Finances, in collaboration with Records and Registration, the Information Technology Services (ITS) department, and other pertinent academic units.

The institution maintains and keeps current an [online listing](./evidences/OfficeoftheGeneralCounselWebpage.pdf) of all University policies and regulations pertaining to privacy and security practices and processes. Access to student data is restricted to those with a legitimate educational interest. All access is removed from individuals prior to departure from FGCU employment (FGCU [Policy 3.035](./evidences/FGCUPolicy3.035LockandKey.pdf)). Additionally, several areas including Records and Registration and [Information Technology Services](./evidences/InformationTechnologyServices.pdf) are routinely audited for security procedures by both University and state auditors (Operations Audit, [November 2022](./evidences/2023055.pdf)).

Records and Registration is the central repository for all academic records, relevant supporting documentation, and general educational records at FGCU. Located in Howard Hall , the office is in a secure area. Physical documents (paper) are maintained in secure storage. Additionally, the building is locked down automatically at the end of the business day and remains so until the start of the next business day.

All new employees must agree to the [Signature Statement](./evidences/WorkdayConfirmReadofCodeofResponsibility.pdf) in Workday indicating their understanding and willingness to comply with all rules and regulations governing security, confidentiality, and integrity of many types of records. Employees must adhere to [Code of](./evidences/EmployeeCodeofResponsibilityforStudent.pdf) [Responsibility](./evidences/EmployeeCodeofResponsibilityforStudent.pdf) for Student, Finance, and Human Resources & Payroll Info and must be approved for specific access.

Students are informed through several channels about measures taken by the University to protect their records. These channels include the [Academic Catalog](evidences/Academic_Catalog_Records_Registration.pdf), the Records and Registration [website](./evidences/DepartmentofRecordsRegistrationwebpage.pdf), and the Center for Academic Achievement [website](./evidences/CAAWebpageFERPA.pdf). In addition, students and parents are educated at orientation as to their FERPA rights and responsibilities in addition to the FGCU web resources of these policies.

##### Authorization and Security

No one can access Florida Gulf Coast University's information technology resources without proper authorization. By logging in to the FGCU network and/or Gulfline system, a user agrees to abide by all applicable federal, state and local laws, Florida Board of Governors rules, and University rules, regulations, and policies as documented in FGCU’s University Technology Resources policy. The login process requires users to have a university issued email address and password for access. Process that access confidential records and student information require [two-factor authentication](./evidences/TwoFActorauthenitication.pdf), FGCU has partnered with Duo Security.

The underlying enterprise resource information system used by FGCU to conduct and keep student records related to admission, student records, student financial aid, student finance, enrollment, and academic progress (including grades and transcripts) is Banner. At FGCU, access to Banner, Tableau, and other systems within the FGCU network [require authorization](./evidences/AccesstoBannerWebpage.pdf), which is granted to individuals on a need-to-know basis . Employee access to various systems is determined and approved by the various data custodians through [Student Systems Security Request Form](./evidences/StudentSystemsSecurityRequestForm.pdf).

The student information system is protected behind a firewall and the data contained there is backed up nightly. Backups to disk on cloud storage are scheduled daily to ensure that a copy of all data exists in geographically disparate cloud storage in the event of a disaster. The FGCU database server and its student data are physically secure. The database server is located in a secure environment that provides extensive backup and recovery procedures. Restricted and limited access is granted to this server and security, backup, and recovery procedures are audited and certified annually to ensure a high level of security and compliance. Full backups of the student information system are performed nightly to cloud storage that stores daily copies for 30 day, weekly copies for 90 days and monthly backups for 180 days. Additionally, a business continuity plan is in place which includes equipment configurations, system recovery priorities, activation, and testing.

##### Training

An important safeguard of the confidentiality of FGCU's student records is the training and education of all users of the administrative electronic information system. Records and Registration in collaboration with General Counsel provide FERPA [training](./evidences/GeneralCounselTrainings.pdf) to the University community. Employees requesting access to electronic student records through the Records and Registration must be approved for specific access by their supervisor.

Security awareness training is conducted through the Workday Learning system and is required for all employees (an example Workday [Transcript](./evidences/WorkdayTrainingTranscriptexampleforanemployee.pdf)) . The training and curriculum are reviewed on an annual basis and updated if necessary. Training covers such items, as phishing emails, social engineering, and safe computing advice.

Access to student data records is maintained by a restricted group of data custodians. [Security access review requests](./evidences/FinancialAidSecurityAccessReviewResponseneededRedacted.pdf) are sent by ITS to the supervisors of the employees to confirm, review, update access as necessary to ensure continuing security conditions are met.

FGCU also ensures that independent contractors or agents that have access to or maintain student records are governed by the same principles and policies as institutional employees. A clause for compliance with FERPA is included in all contracts with the third-party vendors. (An example [contract](./evidences/HelioCampusMSAandSOW6.2.23Signed.pdf), page 6)

##### Summary

FGCU enforces strict policies to safeguard the security, confidentiality, and integrity of student records. FGCU’s Educational Records Policy limits the release of student information unless permitted by law, detailing practices for protecting directory information and handling student data requests. The Department of Records & Registration manages student records using the Ellucian Banner system and ensures secure storage of physical records. Information Technology Services (ITS) ensures the security of computing and networking environments, adhering to federal, state, and university policies. FGCU’s security policies are developed in accordance with guidelines from AACRAO, FERPA, and Florida statutes. Access to student data is restricted to those with legitimate educational interests, and regular audits ensure compliance. The university employs extensive training programs to educate employees on safeguarding student records, requiring specific authorization for access and implementing two-factor authentication and other security measures. Backup and disaster recovery plans are in place to maintain data integrity and continuity.

##### Documents Linked:

[Academic Catalog](evidences/Academic_Catalog_Records_Registration.pdf)

[Access to Banner Webpage](./evidences/AccesstoBannerWebpage.pdf)

[CAA Webpage FERPA](./evidences/CAAWebpageFERPA.pdf)

[Department of Records Registration Webpage](./evidences/DepartmentofRecordsRegistrationwebpage.pdf)

[Employee Code of Responsibility for Student](./evidences/EmployeeCodeofResponsibilityforStudent.pdf)

[FGCU Policy 3.006 Education Records](./evidences/FGCUPolicy3.006EducationRecords.pdf)

[FGCU Policy 3.035 Lock and Key](./evidences/FGCUPolicy3.035LockandKey.pdf)

[FGCU University Technology Resources Policy 3.022](file:///D:\Downloads\SACSCOC%20COMPLIANCE%20CERTIFICATION%20(22)\Final\Section_12_5_Student_records\evidences\policy3.022.pdf)

[FS 1002.22 Education Records K12](./evidences/FS1002.22EducationRecordsK12.pdf)

[FS 1006.52 Education Records](./evidences/FS1006.52Educationrecords.pdf)

[FS 119.01 Public Records](./evidences/FS119.01PublicRecords.pdf)

[Financial Aid Security Access Review Response Needed Redacted](./evidences/FinancialAidSecurityAccessReviewResponseneededRedacted.pdf)

[General Counsel Trainings](./evidences/GeneralCounselTrainings.pdf)

[Helio Campus MSA and SOW 6-2-23 Signed](./evidences/HelioCampusMSAandSOW6.2.23Signed.pdf)

[Information Technology Services](./evidences/InformationTechnologyServices.pdf)

[Office of the General Counsel Webpage](./evidences/OfficeoftheGeneralCounselWebpage.pdf)

[Operational Audit 2023-055](file:///D:\Downloads\SACSCOC%20COMPLIANCE%20CERTIFICATION%20(22)\Final\Section_12_5_Student_records\evidences\2023055.pdf)

[Policy 3.042 Restricted Data](./evidences/Policy3042RestrictedData.pdf)

[Student Rights FERPA Policies Webpage](./evidences/StudentRightsFERPAPolicieswebpage.pdf)

[Student Systems Security Request Form](./evidences/StudentSystemsSecurityRequestForm.pdf)

[Two Factor Authentication](./evidences/TwoFActorauthenitication.pdf)

[Workday Confirm Read of Code of Responsibility](./evidences/WorkdayConfirmReadofCodeofResponsibility.pdf)

[Workday Training Transcript Example for an Employee](./evidences/WorkdayTrainingTranscriptexampleforanemployee.pdf)