

**3.9.2** The Institution protects the security, confidentiality and integrity of its student's records. (**Student Records**)

### **Judgment of Compliance**

Compliance

### **Narrative**

Albany State University protects students' rights to privacy and provides appropriate protection and rights under FERPA- Family Educational Rights & Privacy Act. This protection and privacy is required as it relates to hard copy and electronic records. The Registrar's Office keeps abreast of FERPA requirements and changes by attending meetings and by making regular references to the FERPA Guide. FERPA information is located in the hard copy and electronic versions of the university catalog, undergraduate [\[1a\]](#) and graduates [\[1b\]](#).

### **Security**

Hard copy and microfilmed records for students enrolled since 1996 are maintained in a secure system managed by the Registrar's Office. Hard copy records prior to 1996 are maintained in an isolated area in the university's records management storage. Electronic records are maintained in conjunction with the university's Information Technology department. There is an off campus back up system for electronic academic records managed by the university Chief Information Office (CIO).

Hard copy records are being scanned into an imaging system. The scanning includes all hard copy records which are inactive, graduated, active. These records are secured under supervision of staff in the records center.

Transcript security paper is stored in a locked system in the Registrar's Office. At the end of the work day any staff member with unused security paper is responsible for moving the paper from a desk or copier to the locked system.

### **Confidentiality and Integrity**

The university maintains strict adherence to securing and protecting student records. Any university employee with access to student records is required to support the protection of student records. Workshops and training is provided for new faculty/staff at points of entry; faculty/staff Fall Conference presented by Information Technology staff, and others on an as needs basis; and on-going training session when the need is identified. Each department with authorized users of access to student records is required to manage and monitor security and protection of student records. The Registrar reviews regularly with the CIO and the Vice President for Academic Affairs the authorized users list for the Banner registration form. Only those individuals identified as admissions staff members and work-study students who have signed a University Confidentiality and Security Access Agreement [\[2\]](#), have access to this area. Student workers only have access for the purpose of filing.

The Registrar's Office requires university officials and authorized users with access to hard copy records to provide a signature and date indicating access was given. This information is on file in the Registrar's Office.

Agencies from outside of the university who request student specific information from records must present official documents for release purposes and provide appropriate identification before receiving data requested.

The Vice President for Academic Affairs and the University Legal Counsel may be contacted for input involving certain specific requests.

### **Special Security**

Special security for back up of all academic records is in progress. Identification of all hard copy records and their location is being recorded in a hard copy version for security and maintenance during catastrophic disaster. The necessary campus authorities will be infused into the campus disaster major plan.

A number of non-academic confidential records are created and maintained by several offices reporting to either the Vice President for Enrollment Management and Student Affairs or the Vice President for Academic Affairs.

### **Office of Recruitment and Admissions**

- All document, transcripts, admissions applications, test scores and applicant recommendations received by the Office of Recruitment and Admissions are stored in a secure file cabinet that is located out of the view and access of the general public. Only those individuals identified as admissions staff members and work-study students who have signed the University Confidentiality and Security Access Agreement [\[2\]](#), have access to this area. Student workers only have access for the purposes of filing. Other related areas such as the Director of Financial Aid and the Registrar may request access upon approval of the Director of Admissions to review an applicant's file for validation of information. In accordance with students' rights and responsibilities, an applicant has the right to request to review his/her application folder.

At a designated time, after students have enrolled at the university, their records are submitted to the university's registrar office who then takes the responsibility of securing all enrolled students folders.

### **Office of University Student Health Center**

- The University Student Health Center has numerous policies such as those on the release of medical health records, medical records retention and destruction, facsimile transmission of health records, transmission of health information and the treatment of minors. The student health center complies with HIPPA rules and regulations. All staff of Student Health Services must complete the federal government Health Insurance Portability and Accountability Act training regarding confidentiality. Student Health Services maintains records associated with a Rapid HIV Testing Model Grant. These records are kept separate from the

student's health records. The records are kept in a locked file in a locked room. Only the personnel involved in HIV Testing have access to these records.

### **Office of University Counseling Center**

- The University Counseling Center is organized to ensure privacy, security, and confidentiality of psychological records at all times. State and national rules, laws and professional standards specifically stress the importance of confidentiality and security of client information. The ASU Counseling Center adheres to client privilege and confidentiality issues as addressed in the Code of Georgia, and the Code of Ethics of the American Counseling Association. Confidentiality issues are also specifically state in the Counseling Center's policy statement, Student Information and Consent Form that students read and sign before counseling begins. Each Professional Counselor maintains caseload files in a locked file cabinet and can not be accessed by anyone other than the counselor or in case of emergency Counseling Center Director. In accordance with the Counseling Center Confidentiality Policy [\[3\]](#), all student workers and graduate interns are trained on the Center's Confidential Policy.

### **Office of University Career Services Center**

- The University Career Services Center maintains student records for recruiting and advising files. These files can be accessed only by authorized Career Services staff. Student files are centrally located in locked file cabinets in a locked room. All students sign a consent form [\[4\]](#) before the Career Center releases any information to recruiters.

### **Office of Disability Student Support Program**

- The Office of Disability Student Support Program (DSSP) maintains student records for students enrolled in the program for accommodations and services. These records are accessible only to authorized program staff. Appropriate physical security is maintained at all times. The records are located in a locked file cabinet in the office of the University Disability Coordinator. In accordance with the Counseling Center Confidentiality Policy, all student workers and graduate interns are trained on the Center's Confidential Policy.

### **Office of Housing and Residence Life**

- The Office of Housing and Residence Life, and all units within that operation, protect the security, confidentiality, and integrity of student records. Housing records include room assignment and some financial information. Any information in regard to student records or information is handled in accordance with the Family Educational Rights and Privacy Act requirements and University Public record policies. Procedures for handling student records are included in all manuals and handbooks [\[5\]](#). Residence Hall Directors and other staff members who have responsibilities for student files are instructed about proper methods in their initial training. Continuous training and seminars are conducted throughout the academic year reminding all staff of the necessity of protecting student information.

**Office of Student Life and Judicial Affairs**

- The Office of Student Life and Judicial Affairs complies fully with the Family Educational Rights and Privacy Act of 1974 in its treatment of student educational records and the obligation of the university, primarily in the areas of release of the records and the access provided to these records. Disciplinary records maintained by the Office of Student Life are strictly confidential and all disclosures are governed by the Family Educational Rights and Privacy Act of 1974 (FERPA). A student has the right to make a request to inspect and review his/her disciplinary file at any time. A student may also request for his/her disciplinary information released to a third party. Disciplinary files are retained for a period of seven years and may be kept longer due to special circumstance such as, suspension or expulsion or as deemed necessary by the Director of Student Life, the Vice President for Enrollment Management and Student Affairs and/or University Legal Counsel. Records are maintained in locked file cabinets in the Office of the Director of Student Life.

**Supporting Documentation**

- [1a] [Family Educational Rights and Privacy Act of 1974 Guide, Undergraduate Catalog page 46,](#)
- [1b] [Family Educational Rights and Privacy Act of 1974 Guide Graduate Catalog, page 23](#)
- [2] [Albany State University Confidentiality and Security Access Policy](#)
- [3] [Counseling Center Confidentiality Policy](#)
- [4] [Career Center Consent Form](#)
- [5] [Residence Hall Guidelines](#)