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WICHITA STATE
UNIVERSITY

Audit Update

A Newsletter from the
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Fall 2009

Security of Student Education Records

Many employees (including student employees) are placed in a unique position of trust and obligation with reference to having access to student records and files and the security and confidentiality of said records and files. The University's **Security and Confidentiality of Student Records and Files Policy** at Section 3.12 of the *WSU Policies and Procedures Manual* clarifies employees' responsibilities in fulfilling this obligation.

Not all University departments maintain student education records, but many do. Student education records should be considered to include any information, in any format or medium, kept by any unit of the University that can be connected to an individual student.

The University Registrar's Office is the official repository for "permanent file" information. Permanent file information includes any information needed to verify enrollment, classes, academic standing, grades, GPA, or graduation. The Registrar's Office outsources most requests for this information to the National Student Clearinghouse, which charges inquirers a fee (except for student loan providers). Occasionally, someone will attempt to obtain student education information directly from a department in order to avoid the fee. Caution is in order whenever there is an outside request for information from a student education record.

Policy Statement

Section 3.12 contains the following provisions (refer to the *WSU Policies and Procedures Manual* for the full text):

1. Employees are expected to maintain a clear understanding of the type of information which can be released without the student's consent. The Registrar's Office periodically conducts training on the Family Educational Rights and Privacy Act of 1974, (FERPA).
2. No employee may make unauthorized use of any student information in files maintained, stored, processed or accessed by any University Office.
3. Employees may not seek personal benefit or allow others to benefit personally by knowledge of any student record which has come to them by virtue of their work assignment.
4. Employees may not exhibit or divulge the contents of any record or report to any person except in the conduct of their work assignment or in accordance with office and University policies and procedures.
5. No employee may knowingly include or cause to be included in any student record a false, inaccurate, or misleading entry. No employee may knowingly alter or expunge from any student record, or cause to be altered or expunged, a true and proper entry.

Recommended Procedures

It has been our experience that while University employees are generally familiar with the need for student records security, few departments have adopted written procedures to guide their handling of student education records. The basic procedures detailed below can serve as a guide. Feel free to edit these basic procedures so they can be adopted as written procedures that are specific to your department.

1. All department personnel should be familiar with the University's Security and Confidentiality of Student Records and Files Policy (Section 3.12 of the *WSU Policies and Procedures Manual*).
2. One person should be designated as the person with primary responsibility for the maintenance of student education records in the department. A second person should be designated to serve in the first person's absence.
3. Student education records include, but are not limited to, academic evaluations, examinations, transcripts, test scores, scholarship applications, and general counseling and advising records.
4. All student education records should be maintained in a secure area. File cabinets containing student education records should be locked whenever the person with primary responsibility for the records is away.
5. Access to student education records should be monitored by the person with primary responsibility for the records, and a check-out procedure should be used to track all student education records removed from the department's files.
6. Student education records should never be left unattended in areas open to third parties. Computer monitors should be positioned so that a student's electronic record cannot be viewed by unauthorized persons.
7. All personnel who have access to student education records must attend the University's FERPA training.
8. All inquiries related to the release of student education records should be directed to the person with primary responsibility for the maintenance of student education records in the department, the University Registrar's Office, or the University General Counsel's Office.
9. The University is required to maintain a record of all outside requests for and/or disclosure of information from a student's education record. Directing outside requests to the Registrar's Office or the General Counsel's Office will eliminate the need to keep these records in the department.