

Procedures for Information Security

Appendix A

General College Compliance Procedures

The College instructs employees to take basic steps to maintain the security, confidentiality and integrity of student financial information, such as:

- locking rooms and file cabinets where paper records are kept;
- using password-activated screensavers;
- using individual passwords for computer access;
- referring calls or other requests for customer information to designated individuals who have authority to release such information;
- regularly reminding employees of MCAD's policy, and the legal requirement, to keep customer information secure and confidential;
- Recognizing any fraudulent attempt to obtain customer information and reporting it to the proper administrator who will in turn report it to the proper authorities as necessary.

The following departments have considerable access to student and/or employee information. Safeguards to ensure the security and confidentiality of customer information within these departments are outlined below.

Business Office

The Business Office is protected by a security alarm. The door to the Business Office is locked when the office is closed. The front door and payment window of the Business Office are monitored at all times by Public Safety staff by way of security cameras. All monies entrusted to the Business Office are maintained in a locked fireproof safe whenever Business Office staff is away from the office.

Accounts Receivable

Student payments (other than financial aid awards) are received in the form of cash, checks, and/or credit cards. These payments are received by the Business Office staff, and entered into the student information system by the Bursar. All postings and related supporting documentation is maintained in a secure filing cabinet, and older records are stored in a storage closet that is locked at all times.

Donor payments are brought to the Business Office from the Development Office. These are deposited and entered into specified accounts by the Payroll Specialist. Donor credit card payments are initiated in the Development Office with the individual donors, and a "Credit Card Charge" form is provided to the Business Office so that the credit card transaction may be run through the charge card processing machine and posted to the proper ledger account. All postings and related supporting documentation is maintained in a secured filing cabinet.

Perkins loans are processed by the Bursar after a directive is received from the Financial Aid Office. All student information is maintained in a secure filing cabinet in the Business Office.

Accounts Payable

Accounts Payable maintains files that have paid invoice records. These records include a copy of the check, invoice, and supporting documentation. Within this file are payments to 1099 vendors that include their personal address and social security numbers. These records are stored in a secure filing cabinet in the Business Office and in the locked storage closet.

Office Services

Copies of credit card information regarding cards issued to MCAD employees are maintained in the business office in a secure filing cabinet.

Payroll

Student and staff payroll information is collected by the Payroll Specialist prior to each payroll for submission to Ceridian, the outside payroll processor for MCAD. The Human Resources office provides all faculty and staff information to the Payroll Specialist. After the payroll is processed, the Payroll Specialist maintains all relevant data. Employee checks are kept in the Business Office safe until distributed. The Financial Aid Office monitors all student workers' pay for each payroll period.

On payday, all faculty and staff paychecks are distributed either to the head of the department or to the individual mailbox. The mailboxes are located in the Mailroom, which is monitored when open and locked when closed. Student employee checks are distributed to the head of the department by which the student is employed. Unclaimed checks are mailed to each employee. Unclaimed direct deposit notifications are destroyed after a reasonable period.

All payroll records are maintained by the Payroll Specialist and kept in a locked filing cabinet within the Business Office.

Financial Aid

Third parties with whom Financial Aid interacts include lending agencies as well as federal and state governments. These agencies follow federal guidelines resulting from the Privacy Act and the Higher Education Act.

Student information that is located in the Financial Aid office is stored in locking filing cabinets. Office doors are always locked when a staff member is not present. Any obsolete materials are shredded within the office or through an outside shredding company.

Records Office

All student information is archived under the direction of the Registrar. A student may receive a transcript upon written request that is dated and signed by the student. To

ensure that the information provided is to the proper student, the birth date and social security number must be included on all requests.

Student identification numbers are assigned by the Records Office or by the Admissions Office. To ensure confidentiality of students' personal information, these numbers are totally different from the students' Social Security Numbers.

The Records Office is charged with the compliance of all FERPA regulations as they relate to MCAD.

Continuing Studies

The Continuing Studies Office receives tuition payments and enrollment forms through the mail and over the phone. The tuition is in the form of cash, check, and/or credit card payment. These payments are handled by the Records Office and delivered to the Business Office for processing after they have been documented as received. The enrollment forms are forwarded to the records office with the payments.

Any student information is kept in secure filing cabinets that are constantly monitored during business hours. The office door is locked after hours or when there is no one present in the office. The enrollment forms and payments are walked to the records office for processing. Redundant materials are shredded in the office or by an outside shredding company. The Continuing Studies Office strictly adheres to all FERPA regulations as they relate to MCAD.

Admissions Office

The Admissions Office receives application fees and tuition deposits. These come in the form of cash, check, and/or credit card payment. These payments are handled by the office coordinator and delivered to the Business Office for processing after they have been documented as received.

All student information is kept in secure filing cabinets that are constantly monitored during business hours. The office door is locked after hours. When files are completed before orientation, they are securely moved to the Records Office. Redundant materials are shredded in the office or by an outside shredding company. The Admissions Office strictly adheres to all FERPA regulations as they relate to MCAD.

Career Services Office

The Career Services Office manages the registration of for-credit student internships annually. Students complete a Learning Contract that includes their name, address, phone number, major, year in school, and the logistics of the internship. The completed contract is signed by the student, internship site supervisor, the MCAD faculty sponsor, and the MCAD Division Chair. A copy of the completed form is sent to the internship site, MCAD Faculty Sponsor, and the MCAD Records Office. Original copies are filed in the Career Services Director's office that is either locked or staffed at all times. Career Services staff will discuss a student's internship activity with the internship site and/or the faculty who are grading the student.

The Career Services Office does not distribute any information about students unless requested by the student. With the student's permission, resumes may be used to provide strong samples for students developing their own resume. Students working in the Career Services Office sign an MCAD Career Services Agreement, stating they understand and will adhere to the professional conduct standards of the Career Services Office, and that no student information is to be copied, distributed, or discussed outside of the office.

Housing Office

Student information located in the MCAD Housing Office is stored in filing cabinets and on computer. The MCAD Housing Office door is always locked when no staff members are present. All MCAD Housing staff members (one director, eight student resident assistants, and one student office assistant) are trained to keep all date of birth, address, and phone number information confidential. Student staff members sign a statement that they understand and will adhere to FERPA guidelines.

Employee Management and Training

Realizing that employees are the ones who ensure the success of any information security, the Human Resources Department will perform background checks prior to hiring regular employees who will have access to customer information. In addition, the Employee Handbook, the Faculty Administrative Handbook and the Adjunct Faculty Handbook all contain a section on confidentiality that expressly prohibits the disclosure of confidential information.

Information Systems and Processing

Network and Software Design

MCAD uses financial, student, and development software (produced by Jenzabar, Ceridian, and Great Plains) which is designed for password and "permissions" access only; this limits access to those users who have a need to use particular sections of the software and prevents unauthorized actions.

Each employee chooses a password with which to gain access to the computer terminals and software. These passwords are maintained by the Information Technology Department.

Information Processing, Storage, Transmission, and Disposal

Information is processed daily, and backed up five days a week in the early morning hours. The server room is kept locked and can only be accessed with the permission of the Accounting Department or the Information Technology Department.

Information contained on the server is accessible only by the Information Technology Department and is protected by passwords.

Software Backup Plan

All data residing on the Jenzabar, Ceridian and Great Plains software is backed up using a rotating schedule. The backup tapes are stored in a separate secured location during the rotation. In addition, the backups that are made on Friday night are stored with Iron Mountain, a company specializing in securing data.

Managing System Security

The Information Technology Department manages system security. This ensures that staff on the technology team implement and carry out required responsibilities relating to the academic, student, and financial software and hardware needs of the campus.

The “backbone” of the system is outfitted with security filters that include access lists to help ensure the integrity of the system and the information residing therein.

Third Party Service Providers

MCAD continually strives to control the risks associated with third party service providers that receive, maintain, process, or otherwise are permitted access to student and/or employee information through their services to the institution. The following third parties have been identified as providing services to the College whereby access to student and/or employee information is provided, either directly or indirectly, through access to MCAD’s records so that the service providers can fulfill their contractual obligation to the institution. MCAD has requested individual safeguards rules from the third party service providers:

- Credit Bureau Enterprises (collection agency)
- Williams and Fudge (collection agency)
- Northland Credit Control (collection agency)
- Outsourcing Solutions Inc. (collection agency)
- IPEDS (government reporting agency)
- TIAA-CREF (employee pension investments)
- Lincoln National Life (employee pension investments)
- Sheffield Olson McQueen (employee benefit administrator)
- Great Plains Dynamics (software provider)
- Ceridian Employer Services (payroll service)
- National Student Loan Clearing House (NSLC)
- Key Education Resources (payment plan provider)
- Veterans Administration
- Sales Force (Admissions’ CMS system)