

SAFEGUARDING STUDENT FINANCIAL INFORMATION POLICY – GENERAL FORT HAYS STATE UNIVERSITY

Effective 05/23/03

General

Fort Hays State University ("FHSU") has adopted this policy in compliance with the Gramm-Leach-Bliley Act (GLB Act, Sec 16CFR Part 314). This policy will be reviewed and adjusted as necessary, at least on an annual basis. The FHSU Internal Compliance Coordinator will report to the Vice President of Administration and Finance in written form at least annually or more frequently if material events warrant.

Providing Safeguarding Policy Notices

FHSU will provide safeguarding student information policy notices as required by the GLB Act. Students will be sent initial safeguarding student information policy notices to their permanent addresses. Thereafter, students will be sent safeguarding student information policy notices at least annually. New students will receive safeguarding student information policy notices at the time of application or approval of services. Safeguarding student information policy notices will be provided in a form that the student may access at a later time.

Collection of Student Information

FHSU collects information about students in many ways. Information is provided by students to FHSU on admission applications, financial aid applications, and through a variety of other forms and services. FHSU also receives information when processing student transactions such as clearing checks, ACH transfers, debit transactions, and more. Students also provide information in response to questions posed by FHSU or in their correspondence to FHSU. All nonpublic personal information collected is subject to the confidentiality provisions of this policy.

Confidentiality and Security of Student Information

FHSU will undertake reasonable measures to protect the confidentiality and security of student information. Physical security of documents, restricted access to information, and proper handling of information form the basis of FHSU's procedures.

- FHSU employees will verify students' identity before releasing information or processing transactions for students.
- FHSU employees will also maintain control and security of documents that contain student information. After processing, documents with nonpublic personal information will be properly filed or discarded.
- FHSU employees are allowed access to students' information as needed to fulfill students' requests or conduct FHSU business as may be appropriate.
- FHSU maintains physical, electronic, and procedural safeguards to protect student information.

Application to Former Students

FHSU's disclosure policies are applied to former students in the same manner as they are to current students.

NPI collected by FHSU

FHSU collects only nonpublic personal information that is needed for the transaction or service a student requests. FHSU may collect this information from the following sources:

- Information FHSU receives from a student's application or other forms;
- Information about a student's prior transactions with FHSU or others;
- Information FHSU receives from a consumer reporting agency, if any.

Types of NPI FHSU Discloses and to Whom FHSU Discloses NPI

Although FHSU does not generally disclose a student's nonpublic personal information to outside parties, we may disclose any of the nonpublic personal information we collect under the following circumstances:

1. When a student asks or gives FHSU permission to do so;
2. In furtherance of the transaction or service a student requests;
3. As otherwise permitted or required by law. For example, a disclosure made to an entity to which a student has identified FHSU as a credit reference if such disclosure is limited to information related to the student's specific transactions or experiences with FHSU.
4. To Third Party Affiliates. For example, FHSU may disclose a student's nonpublic personal information to its agents, but only to the extent necessary to further the transaction or service, such as a Collection Agency or Credit Bureau.

Pretext Calling

FHSU prohibits its employees from obtaining, attempting to obtain, or causing to be disclosed, student financial information relative to another person by use of false or fraudulent practices. These practices include:

1. Making a false statement to an employee of FHSU,
2. Making a false statement to a student of FHSU, or
3. Providing, to an employee of FHSU, a document that a person knows is false, stolen, fraudulently obtained, or contains a false representation.

Inquiries made to FHSU shall require the verification of the identity of the requesting party, a determination of the reasons information is being requested, and a determination of the authorization of the student to disclose the information. Authorization by the student may include the issuance of a check, an application for credit, and express authorization for verification, or other means that may be deemed reasonable.

Training

FHSU employees with access to student financial information defined by the GLB Act will participate in training on safeguarding student information. This issue will be covered as part of employee orientation and as needed in departmental meetings. Student privacy issues, FHSU's privacy policy, and appropriate procedures will be reviewed annually with all employees.

Applicable employees are trained to respect students' privacy through compliance with FHSU's policies and procedures. Failure to comply will subject employees to disciplinary action.

Security Statement

FHSU is committed to ensure the confidentiality of student's online transactions. FHSU banking products incorporate designed-in security features for safeguarding student accounts and the information students transmit to FHSU during a session. FHSU's detailed security features can be viewed on-line at www.fhsu.edu/policies/.

Approved by President's Cabinet 06/04/03