



Internal Audit Report

STUDENT RECORDS SECURITY – FERPA AWARENESS AND COMPLIANCE

Report No. SC-13-11
May 2013

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Approved
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I. EXECUTIVE SUMMARY

Internal Audit & Advisory Services (IAS) has completed an audit of student records security to determine the level of awareness and adequacy of controls within the colleges, divisions, and academic departments for ensuring campus compliance with the Family Educational Rights and Privacy Act (FERPA) and university policy.

Overall, campus staff who worked with students were knowledgeable and trained on FERPA. Student records maintained by staff were generally managed in compliance with FERPA and university policy.

In addition, controls over electronic and paper student records maintained by staff and faculty that we reviewed, were in compliance with FERPA with the exception of the exchange and disposition of student coursework as described below.

Opportunities existed for strengthening an awareness of FERPA within the faculty and of appropriate access to FERPA data to help ensure the privacy of student's records and campus compliance with FERPA requirements.

The following issues requiring management corrective action were identified during the review:

A. Lack of Faculty Awareness with Access to FERPA Data

A large number of faculty responding to our survey indicated they were either not familiar with FERPA, had not taken FERPA training, or rated their knowledge level of FERPA as low, but had access to FERPA data.

B. FERPA Training

FERPA training is not required for faculty and the majority of faculty surveyed had not had formal FERPA training. Opportunities existed for improving the delivery and tracking of FERPA training.

C. FERPA Materials Stored in Cloud Services

Faculty and staff were not always familiar with the security considerations when storing FERPA data using cloud services.

D. Security over Student Course Work

The manual exchange and disposition of paper student coursework was not always conducted in a secure manner.

Management agreed to all corrective actions to address risks identified in these areas. Observations and related management corrective actions are described in greater detail in section III of this report.

II. INTRODUCTION

Purpose

The purpose of this audit was to determine the level of awareness and adequacy of controls within the colleges, divisions, and academic departments and associated advising offices, for ensuring campus compliance with the Family Educational Rights and Privacy Act (FERPA) and UC Policy.

Background

FERPA is a federal law that protects the privacy of student education records and establishes a student's right to inspect, review, and correct errors in their education records. Generally, schools must have written permission from the student in order to release any information from a student's education record.

However, schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance.

At UCSC, the Registrar's Office is generally responsible for student records, administering FERPA compliance and distributing FERPA and student records related information. The Registrar's Office publishes a variety of information about FERPA and student records for staff, faculty, parents and students.

FERPA training is required for staff who work with students, but FERPA training for faculty is generally not required. The Registrar's Office administers FERPA training in the form of an online FERPA quiz.

While most student records exist in the enterprise Academic Information System (AIS), eCommons, or the Data Warehouse; nearly all staff and faculty who work with students create, receive, and store some records outside of these systems. These records are not directly managed by any central office and little oversight is provided other than the information and links referenced in periodic emails from the registrar. These distributed records were the focus of this review.

Students are granted a right under FERPA to restrict the university from disclosing any information about them including their name and that they are a student. To exercise this right a student must file a non-release of public information request (NRI). The university must ensure that no information about students who exercise this right is disclosed except to university officials who have a legitimate educational interest in the information. UC policy also states¹

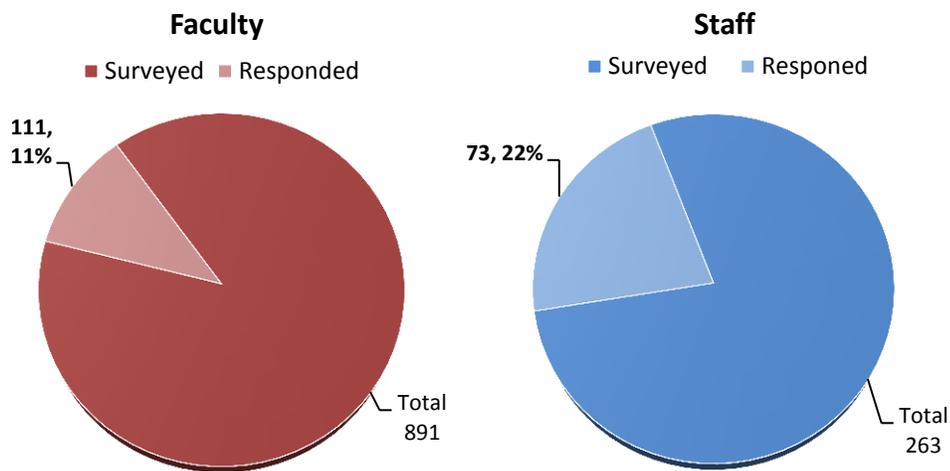
¹ *University of California Policies Applying to Campus Activities, Organizations, and Students October 9, 2009* (Section 130.11 updated 7/20/2010) <http://www.ucop.edu/ucophome/coordrev/ucpolicies/aos/toc.html>

“When the law is silent, the campuses shall be guided by two principles: (1) the privacy of an individual is of great weight, and (2) the information in a student's file should be disclosed to the student on request.”

Scope

A survey tool was distributed to 891 faculty members and 263 staff to understand the level of awareness and the nature and extent of controls for ensuring compliance with FERPA and university policy. Approximately 16% of those surveyed responded. Refer to Exhibit 1 – Survey Response Rate.

Exhibit 1- Survey Response Rates



The survey questions and responses were compiled and summarized in Appendix B – Student Record Survey Results. The makeup of faculty and staff responded to the survey was summarized by title code in Appendix C – Student Record Survey Demographic.

Follow-up meetings were conducted with six selected faculty (1 lecturer, 2 associate professors, and 3 professors) and 14 staff responding to the survey to discuss electronic and paper record security, workstation configuration and security, and student record management practices.

In addition, building walk-throughs were performed in faculty and advising areas at selected colleges/academic divisions including: School of Engineering, Kresge, Porter, Cowell, College Nine and the Theatre Arts Complex to observe student records management and disposition practices.

We did not perform a detailed IT review of individual workstations. In addition, we did not specifically review AIS or eCommons security, but did review how permissions and use of these systems impact the overall management and compliance environment.

This review focused on the privacy of distributed student records. Our review of NRI compliance was limited to inquiries made during interviews with faculty and staff.

III. OBSERVATIONS REQUIRING MANAGEMENT CORRECTIVE ACTION

A. Lack of Awareness and Access to FERPA Data							
A large number of faculty responding to a survey indicated they were either not familiar with FERPA, had not taken FERPA training, or rated their knowledge level of FERPA as low, but had access to FERPA data.							
Risk Statement/Effect							
A lack of FERPA knowledge combined with access to FERPA data could result in the unintentional disclosure of student information and violation of Federal Regulations.							
Agreement							
A.1	<table border="1"> <tr> <td rowspan="3">The Vice Provost and Dean of Undergraduate Education (VPDUE) and the Vice Provost and Dean of Graduate Studies (VPDGS) will collaborate with the Academic Senate, divisions, departments, and programs, and faculty members having electronic access to protected records, to increase the level of familiarity with FERPA and in seeking the goal of achieving full participation in FERPA training within 3 years.</td> <td>Implementation Date</td> </tr> <tr> <td>12/31/2013</td> </tr> <tr> <td>Responsible Manager</td> </tr> <tr> <td></td> <td>VPDUE/VPDGS</td> </tr> </table>	The Vice Provost and Dean of Undergraduate Education (VPDUE) and the Vice Provost and Dean of Graduate Studies (VPDGS) will collaborate with the Academic Senate, divisions, departments, and programs, and faculty members having electronic access to protected records, to increase the level of familiarity with FERPA and in seeking the goal of achieving full participation in FERPA training within 3 years.	Implementation Date	12/31/2013	Responsible Manager		VPDUE/VPDGS
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	Responsible Manager						
	VPDUE/VPDGS						

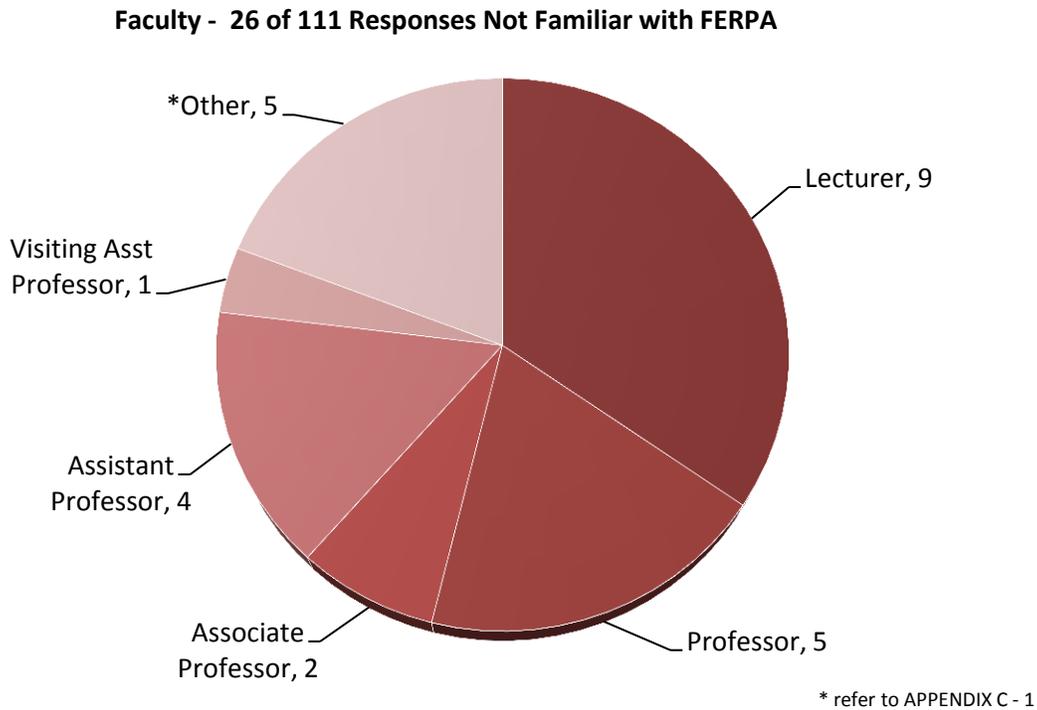
A. Lack of Awareness and Access to FERPA Data – Detailed Discussion

We distributed a survey to 891 faculty members identified by faculty title code series and 263 staff members identified as typically working with student data with the purpose of gathering information on the awareness of FERPA requirements. Refer to Appendix C – Survey Response Demographic.

Faculty Awareness and Access to FERPA Data

Twenty-six of the 111 faculty (22%) who responded to our survey reported that they were not familiar with FERPA (Refer to Exhibit 2 - Faculty Not Familiar with FERPA Demographic, below) and 43 responded that their knowledge of FERPA was low. Over half of the faculty responding to the survey reported that they had never participated in formal FERPA training. (Refer to Appendix B – Student Record Survey Results).

Exhibit 2 – Faculty Not Familiar with FERPA Demographic



Faculty at UCSC can view student name, major, gender, grade basis (pass/no pass), email address and student ID number for all UCSC students (class roster information). Faculty can also view grades, college, and class enrollment status for any students that have been in their own classes (grade roster information).

Faculty access at some other UC campuses is more restrictive. For example, at UCB and UCLA faculty only have systems permissions to access information about their own students, and FERPA training is required before access is granted for information on all students. Refer to Table 1: Faculty FERPA Training by UC Campus, in section III. B.

We were informed that the Registrar’s Office contacts faculty each quarter by email about privacy of student records, including links to the FERPA information and quiz. However, it appears as though this approach may not been bringing about sufficient awareness of FERPA.

In addition, newly hired senate faculty (approximately 3 to 20 people per year) are provided with a New Faculty Quick Guide maintained by the Academic Personnel Office that includes a link to the UCSC Policy on Privacy of Student Records (on the Registrar’s Office web page). Opportunities were identified for improving the visibility over FERPA information and the FERPA quiz for this small subgroup of newly appointed faculty by including specific reference to FERPA within the New Faculty Quick Guide. We were informed by APO that FERPA referencing has been subsequently added.

If faculty are not adequately familiar with FERPA and continue to have broad access to FERPA data, there is a risk that information might be unknowingly and inappropriately released and/or may not be managed with due care.

Staff Awareness and Access to FERPA Data

Of the seventy-one staff who responded to our survey, all but one was familiar with FERPA. However, nine indicated that they had not taken the registrar's FERPA quiz. Through further inquiry, four supervisors confirmed that the staff had indeed taken the training. The remaining five were all long term employees who may have taken the training, but there are no records to document that they were trained. Since the training is not tracked, it falls upon staff to self-report that they have completed the training.

Unlike faculty, who are not required to take FERPA training, staff members who are granted access to enterprise student information systems, including AIS, eCommons and Data Warehouse are required to take FERPA training, which includes reviewing FERPA information and taking a short FERPA quiz on the Registrar's Office web page. This may help explain the difference in FERPA awareness rates between faculty and staff surveyed.

B. FERPA Training		
FERPA training is not required for faculty and the majority of faculty surveyed had not had formal FERPA training. Opportunities existed for improving the delivery and tracking of FERPA training.		
Risk Statement/Effect		
Without effective delivery and tracking of FERPA training, the campus has less assurance that faculty and staff are aware of FERPA requirements. An inability to demonstrate who has completed FERPA training could increase the scrutiny placed on the campus if challenged by external regulators, such as the Department of Education.		
Agreements		
B.1	The Registrar will maintain electronic FERPA training materials and enable tracking functionality over FERPA quiz training.	Implementation Date
		12/31/2013
		Responsible Manager
		Campus Registrar
B.2	The Registrar will assure that FERPA quiz tracking documentation is provided to AIS, Data Warehouse and any other departments that need to verify training has occurred.	Implementation Date
		12/31/2013
		Responsible Manager
		Campus Registrar

B. FERPA training – Detailed Discussion

The Registrar’s Office hosts an assortment of FERPA and student record related information, such as the general UCSC policy on privacy of student records, a policy quick reference guide, a document titled essential information for faculty, FERPA for parents, and online FERPA quiz, which serves as the campus FERPA training program.

In addition, the FERPA quiz provides a method for increasing the awareness of FERPA for those taking the test by providing immediate feedback and an explanation as to why certain answers are correct or incorrect. The FERPA quiz in essence, is the primary training tool on campus over FERPA. However, there is no designated methodology for staff or faculty to review these materials before taking the quiz.

In our interviews, we found many people were not familiar with these documents and some faculty had gone so far as to develop their own student records/FERPA guides which they shared with others in their academic departments.

It might be useful if an outline or overview existed to guide trainees through these other documents to provide a more comprehensive set of FERPA background materials and provide trainees with a greater awareness of FERPA educational resources.

FERPA Tracking

The largest challenge with the FERPA quiz is that it does not log who has completed it and therefore the university lacks any documentation that training has been provided. Establishing a method to track who has taken the FERPA quiz has been a priority for the Registrar’s Office, but due to competing demands and lack of resources it has not been implemented. The UC Learning Management System or the campus eCommons system are both capable of tracking who has taken the quiz and could be used for administering and tracking the FERPA quiz.

If complaints of FERPA violations were to occur, a well-documented training program would likely result in less onerous corrective actions. If it is determined that faculty should receive FERPA training it will be even more critical that a tracking mechanism exists to ensure all faculty complete the training.

FERPA Training at other UC Campuses

We compared FERPA training programs at all UC campuses, (see table below). We found that some campuses require all faculty to take FERPA training and others do not. One campus does not have an on-going training program, but they provide FERPA information to all newly hired faculty.

Table 1: Faculty FERPA Training by UC Campus (based in interviews with campus Registrar’s offices)

Campus	Required	Comments
UC Berkeley, UCB	Yes	Only train faculty who are given system access to all students, similar to the level of access as UCSC faculty.
UC Los Angeles, UCLA	Yes	Only train faculty who are given system access to all students, similar to the level of access as UCSC faculty.
UC Santa Barbara, UCSB	Yes	Provides FERPA training to all faculty.
UC Davis, UCD	No	
UC Irvine, UCI	No	Provides FERPA information to newly hired faculty, but does not have an on-going training program for existing faculty.
UC Merced, UCM	No	
UC Riverside, UCR	Yes	Provides FERPA training to all faculty.
UC San Diego, UCSD	Yes	Currently implementing a training program for all faculty.
UC San Francisco, UCSF	No	
UC Santa Cruz, UCSC	No	Provides FERPA information to newly hired faculty.

While FERPA legislation does not specifically require a training program, it is a logical assumption that in order to reduce the risk of the inappropriate release of student information, some level of training is needed. Business and Finance Bulletin IS-3 states:

E. Education and Security Awareness Training

Department heads and supervisors shall ensure that appropriate security awareness training is routinely conducted for all members of the university community.

- Training programs should include review of university and campus security policy, guidelines, procedures, and standards, as well as departmental procedures and best practices established to safeguard sensitive information.*
- Training shall be in conformance with regulations governing specific categories of restricted information, such as student data subject to FERPA...*

C. FERPA Materials Stored in Cloud Services						
Faculty and staff were not always familiar with the security considerations when storing FERPA data using cloud services.						
Risk Statement/Effect						
Un-contracted cloud storage services, such as DropBox™ may not necessarily provide the data security desired for FERPA information. When student records are placed in un-contracted cloud storage, the university loses control of the data, and may be legally liable should the data be misused or breached.						
Agreement						
C.1	<table border="1"> <tr> <td rowspan="4">The Registrar has updated FERPA materials and training to include references to cloud storage risks, links to ITS guidance on cloud storage services, and other information to assure training is appropriate and complete, and will make available to campus.</td> <td>Implementation Date</td> </tr> <tr> <td>12/31/2013</td> </tr> <tr> <td>Responsible Manager</td> </tr> <tr> <td>Campus Registrar</td> </tr> </table>	The Registrar has updated FERPA materials and training to include references to cloud storage risks, links to ITS guidance on cloud storage services, and other information to assure training is appropriate and complete, and will make available to campus.	Implementation Date	12/31/2013	Responsible Manager	Campus Registrar
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	12/31/2013					
	Responsible Manager					
	Campus Registrar					

C. FERPA Materials Stored in Cloud Services – Detailed Discussion

Nineteen of 111 faculty who responded were using DropBox™ (un-contracted cloud storage) for file sharing and storage purposes, and those interviewed were generally unaware of the risks and campus guidance related to free and low-cost services for cloud storage.

Information & Technology Services (ITS) has published guidance for the use of free and low-cost services, including contracted (e.g. Google Drive) and non-contracted (e.g. DropBox™) cloud storage, which has not been referenced or included in the Registrar’s Office FERPA information or FERPA quiz.

The Registrar could update FERPA information and quiz to include references to ITS guidance on free and low-cost services.

D. Security over Student Course Work		
The manual exchange and disposition of paper student coursework was not always conducted in a secure manner.		
Risk Statement/Effect		
If security over student course work is not maintained, student privacy could be compromised resulting in a violation of FERPA.		
Agreement		
D.1	The Vice Provost and Dean of Undergraduate Education (VPDUE) and the Vice Provost and Dean of Graduate Studies (VPDGS) will work with the registrar in establishing and communicating to faculty that exchanging course work with students and disposing of written course work should be done in a secure manner.	Implementation Date
		12/31/2013
		Responsible Manager
		VPDUE/VPDGS

D. Security over Student Course Work – Detailed Discussion

We observed that a number of faculty members returned graded papers and accepted papers from students in envelopes or boxes in the hallway outside their offices or they left boxes of papers in another office such as the advisor’s office for students to pick up when they are away.

Some of these graded student papers, computer account request forms and other documents contained the student’s name and student ID number. Grades and student ID numbers are considered non-public information.

The registrar’s document titled, *“Essential Information for Faculty, Teaching Assistants & Readers” from the UC Council of Registrars and the UC Office of General Council* specifically states:

“Do not place graded, identifiable student work in the hallway or an unmonitored area for students to pick up.”

We also observed that in one instance, graded course work was placed in an open recycle can in the hallway outside faculty offices. There was no shredding bin in this building, but there was one in the adjoining building near the departmental office.

A faculty member in another department also told us that he had observed that the recycle bins outside his academic department office were “full” of student course work after midterms or finals.

There was a shredding bin adjacent to the recycle bins noted, but they were behind a locked door and the academic department had the key. This second academic department agreed to post a sign by the recycle bins stating that student course work should be shredded.

The FERPA quiz addresses this issue. One of the questions in the quiz asks about leaving boxes of graded course work for students to sort through to pick up their own course work. The answer to this question states:

“Leaving... graded papers for students to look through is unacceptable. Any information which contains personally identifiable information must be protected”

We noted in our review that some departments provide locked mail boxes with slots for students to submit course work for specific classes. These boxes were seen both outside faculty offices and in central departmental locations in some academic divisions. We consider this to be a best practice that could be used as a model by departments with less secure methods of accepting course work.

APPENDIX A – Summary of Work Performed and Results

Review of Student Records Management Policies, Training, and Guidance	
Work Performed	Results
<p>1. Reviewed campus policies and procedures related to student records management and use and FERPA requirement.</p> <p>2. Reviewed campus FERPA training requirements and training materials on the registrar’s web page.</p>	<p>We learned that FERPA training materials are a series of documents published on the Registrar’s Office web page as resources that includes:</p> <ul style="list-style-type: none"> • FERPA for Parents • FERPA for Faculty • FERPA and eCommons • FERPA Quiz • Employee Statement of Understanding Privacy of Student Records • Authorization to Release Education Record Information • Annual Notification of Student Privacy Rights Under FERPA • UCSC Administrative Procedures Applying to Disclosure of Information from Student Records • UC Policies Applying to Disclosure of Information from Student Records • "FERPA 101: FERPA at the University of California" - Presentation by the UC Office of the President • UC Guidelines for Assuring Privacy of Personal Information in Mailing Lists and Telephone Directories • UC Legal Requirements on Privacy and Access to Information • Office of Privacy Protection - State of California • Family Compliance Office - U.S. Department of Education <p>The FERPA quiz is the only document that is published as a training tool. The quiz does provide immediate feedback with reasons that the answers are right or wrong, but it is only 15 questions and does not contain all the information published in these other documents.</p> <p>There is no structured training that instructs faculty or staff what to read to assure they are adequately trained on FERPA. The FERPA for Faculty is listed as FERPA training for faculty on some links, but aside from these link titles this has not been designated as official faculty training.</p>

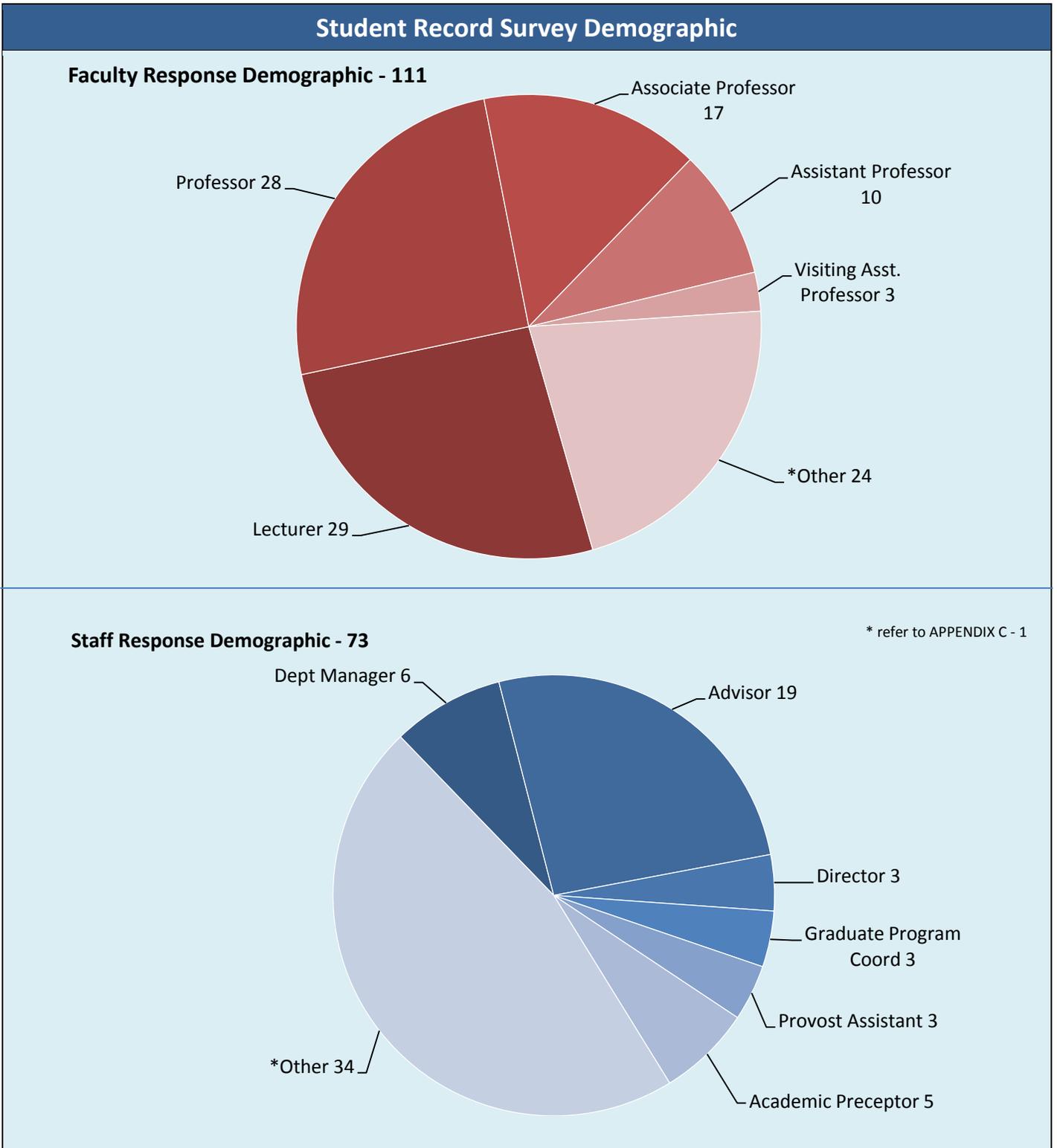
Work Performed	Results
<p>3. Reviewed material from Department of Education web site related to FERPA including Privacy and Technical Assistance Center Data (PTAC) Security Checklist, Identity authentication best practices and related documents.</p>	<p>We reviewed the PTAC checklists, such as the Data Security Checklist, and incorporated these criteria into the questionnaire we used for our interviews and testing conducted as follow-up to our initial survey.</p>
<p>4. Surveyed UCSC faculty, student advisers, and college staff working with student records to understand how student related records outside of AIS are created, shared and managed.</p>	<p>We sent a survey to 1154 faculty and staff, and received 184 responses. See appendix B.</p>
<p>5. Based on responses to survey (see 4.) determined appropriate follow-up detailed testing.</p> <p>6. Interviewed six faculty and seventeen staff members; and conducted on-site inspections of faculty and advising areas within selected colleges/divisions including: School of Engineering, Kresge, Porter, Cowell, and the Theatre Arts Center.</p>	<p>We found most electronic records were either stored on ITS managed computers or were on AIS or eCommons.</p> <p>Because of the functionality offered by the MYUCSC AIS portal and eCommons the faculty we interviewed keep very few electronic records outside of those systems. The only issue identified with electronic records was that some staff and faculty store sensitive FERPA data to cloud storage like DropBox™. They were unaware that ITS has published guidance on Free and Low Cost Cloud Services and the FERPA reference and training materials have not been updated to include this guidance.</p> <p>Most paper records that are maintained by the limited faculty and staff we interviewed were well managed securely locked up and access by students and others is restricted appropriately. The only issue observed with paper records is that some faculty exchange coursework and other documents with their students in an insecure manner that is not in compliance with FERPA.</p>

Other Steps	
Work Performed	Results
<p>7. Determined impact to campus if violations of FERPA occur by phone inquiry to US Department of Education Privacy and Technical Assistance Director. Also discussed training requirements for faculty and expected college training programs.</p>	<p>Department of Education can technically withhold federal funding for FERPA violations and complaints, but more commonly requires corrective actions by the university should complaints or violations occur. We were informed that having a documented FERPA training program is viewed favorably by the federal agency and would most likely result in less onerous management corrective actions if an audit were to result in reportable findings.</p>
<p>8. Surveyed other UC campuses to determine if and how staff and faculty are trained on FERPA.</p>	<p>UCSB, UCR and UCD require FERPA training for all faculty members before they are granted access to enterprise student information systems. UCB and UCLA require FERPA training for faculty who are granted access to data on more than their own students. When FERPA training is required it is tied to granting student information system accounts so that if training is not completed system accounts are not setup.</p>
<p>9. Surveyed ACUA users group about FERPA training on their campuses.</p>	<p>We surveyed the Association of College & University Auditors on-line user group about FERPA training for faculty. The responses we received indicate that University of Florida, Collin Community College in Texas, and Texas Tech University require all faculty members to take FERPA training. Given that these three schools and five UC campuses have mandatory training requirements it would appear that it is within these universities’ authority to require FERPA training.</p>
<p>10. Interviewed APO staff and reviewed the New Faculty Quick Guide, provided to all new faculty, to determine if new faculty employees are informed about student record privacy and FERPA</p>	<p>Newly hired senate faculty (approximately 3 to 20 people per year) are provided with a New Faculty Quick Guide maintained by the Academic Personnel Office. This guide includes a link to the UCSC Policy on Privacy of Student Records maintained on the Registrar’s web page.</p> <p>During the course of the review, the APO added a specific reference to FERPA and the FERPA quiz to improve the visibility over FERPA requirements.</p> <p>We discussed with APO the need to maintain an updated New Faculty Quick Guide resulting from changes in FERPA information and training rolled out by Registrar’s Office, the VPDUE and the VPGDS.</p>

APPENDIX B – Student Record Survey Results

Survey Question/Responses							
1. Do you know of any student related information maintained and/or used outside of AIS?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No	Faculty		
Staff		■ Yes ■ No					
Faculty							
2. Do you create, share, or store student related information (records) outside of AIS?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No	Faculty		
Staff		■ Yes ■ No					
Faculty							
a. What format is used to store student related information outside of AIS?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Electronic* ■ Paper ■ NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table> <p>* 19 of the 111 faculty & staff used un-contracted cloud services (DropBox™) for electronic storage. Refer to C. FERPA Materials Stored in Cloud Services.</p>	Staff		■ Electronic* ■ Paper ■ NR	Faculty		
Staff		■ Electronic* ■ Paper ■ NR					
Faculty							
3. Do you ever share or discuss student related information with non-UC employees (including students/parents) by phone or in response to emails?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No	Faculty		
Staff		■ Yes ■ No					
Faculty							
4. Are you responsible for others who might have access to student related information maintained outside of AIS?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No	Faculty		
Staff		■ Yes ■ No					
Faculty							
5. Are you familiar with Family Educational Rights and Privacy Act (FERPA)?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No	Faculty		
Staff		■ Yes ■ No					
Faculty							
a. What is your familiarity level and knowledge of FERPA?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ High ■ Med ■ Low ■ NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ High ■ Med ■ Low ■ NR	Faculty		
Staff		■ High ■ Med ■ Low ■ NR					
Faculty							
b. Have you ever received training on FERPA?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No ■ NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No ■ NR	Faculty		
Staff		■ Yes ■ No ■ NR					
Faculty							
c. Would you consider any of the student related information that you create, share, or store outside of AIS to be subject to FERPA?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No ■ NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No ■ NR	Faculty		
Staff		■ Yes ■ No ■ NR					
Faculty							
d. Are you familiar with the student option requesting Non-Release of Public Information (NRI)?	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No ■ NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No ■ NR	Faculty		
Staff		■ Yes ■ No ■ NR					
Faculty							
6. Do you ever create, share, or store any of the following?: <i>Social Security &/or Drivers License Information</i>	<table border="0"> <tr> <td>Staff</td> <td></td> <td>■ Yes ■ No/NR</td> </tr> <tr> <td>Faculty</td> <td></td> <td></td> </tr> </table>	Staff		■ Yes ■ No/NR	Faculty		
Staff		■ Yes ■ No/NR					
Faculty							

APPENDIX C – Student Record Survey Demographic



APPENDIX C - 1 – Student Record Survey Demographic Detail

Faculty - Response Demographic - 111		Staff - Response Demographic - 73	
Title	Count	Title	Count
Lecturer	29	Department Manager	6
Professor	28	Advisor	19
Associate Professor	17	Director	3
Assistant Professor	10	Graduate Program Coordinator	3
Visiting Assistant Professor	3	Provost Assistant	3
*Other	24	Academic Preceptor	5
Adjunct Professor	1	*Other	34
Assistant Specialist	1	Academic Editor	1
Associate Dean of Engineering for Technology Dept	1	Associate College Admin Officer	2
Campus Provost & EVC	1	Assoc. Coordinator of Advising, colleges	1
Career Adviser	1	Associate Director of Operations	1
Dean of Social Sciences	1	AVC of Enrollment Management	1
Director- Senior Lecturer	1	C9 & C10 Senior Academic Preceptor	1
Distinguished Professor	1	CAO	1
Graduate Student	2	Classroom Specialist	1
Oakes Core Class Faculty	1	College Assistant	1
PhD Candidate	1	Committee Analyst	1
Professor & Chair	2	Coordinator for Residential Education	2
Professor & Department Chair	1	Cosmos Residential Program Manager	1
Professor Emeritus	1	Credential Analyst	1
Research Professor	2	Crown & Merrill Colleges	1
**Senior Lecturer	1	Director of Orientation	1
Teacher Supervisor	1	Graduate Coordinator	2
Vice Provost & Dean of Undergraduate Education	1	Honors & Awards Coordinator	1
Vice Provost for Academic Affairs	1	Interim Executive Director	1
Visiting Associate Professor	1	Interim Program Coordinator	1
Writing Program Chair	1	International Scholar/Student Advisor	1
Other Subtotal	24	Manager	1
Grand Total	111	Merrill College Assistant	1
		Politics Asst. &UCDC Program Staff Coord.	1
		Program Manager	1
		Project Director	1
		Publications Coordinator	1
		Regional Director	1
		Science Director	1
		Senior Academic Preceptor	1
		Student Employment/PPS Manager	1
		Undergraduate Program Coordinator	1
		Other Subtotal	34
		Grand Total	73
Note: Some of the positions listed under "Other" could also be associated with a specific title listed above.			

APPENDIX D – Student Record Survey Template

Student Records Survey

Internal Audit & Advisory Services is working with the Divisions of Undergraduate Education and Graduate Studies to conduct a review of student related information and records not stored in the campus' enterprise Academic Information System (AIS) or eCommons learning management system.

Your username (**deb@ucsc.edu**) will be recorded when you submit this form. Not **deb**? [Sign out](#)

1. Do you know of any student related information maintained and/or used outside of AIS?

- Yes
 No

If Yes, do you know why the student related information is used outside of AIS?. Please list the types and uses if possible.

2. Do you create, share, or store student related information (records) outside of AIS?

If you answer No, skip to question #3

- Yes
 No

2a. What format is used to store student related information outside of AIS?

Select all that apply.

- Email (local computer, email server, file server, other)
 Database (local computer, email server, file server, other)
 Spreadsheet
 Web
 Paper copy
 Google Drive/Google Docs
 Dropbox or other cloud storage
 Portable electronic media such as USB drive or portable hard drive

If Other, please describe what format is used.

2b. Where is student related information stored?

Select all that apply.

- Local computer
- Email server
- File server
- Paper copy
- Other

If Other, please describe where this student related information is stored.

3. Do you ever share or discuss student related information with non-UC employees (including students/parents) by phone or in response to emails?

- Yes
- No

If Yes, Please describe the process used for verifying the identity of non-UC employees (including students/parents) requesting student related information

4. Are you responsible for others who might have access to student related information maintained outside of AIS?

- Yes
- No

If Yes, how do you ensure those with access are authorized?

5. Are you familiar with Family Educational Rights and Privacy Act (FERPA)

If you answer No, skip to question #6

- Yes
- No

5a. What is your familiarity level and knowledge of FERPA?

- High
- Medium
- Low

5b. Have you ever received training on FERPA?

- Yes
- No

5c. Would you consider any of the student related information that you create, share, or store outside of AIS to be subject to FERPA?

- Yes
- No

5d. Are you familiar with the student option requesting Non-Release of Public Information (NRI)

- Yes
- No