ADMINISTRATIVE REGULATIONS
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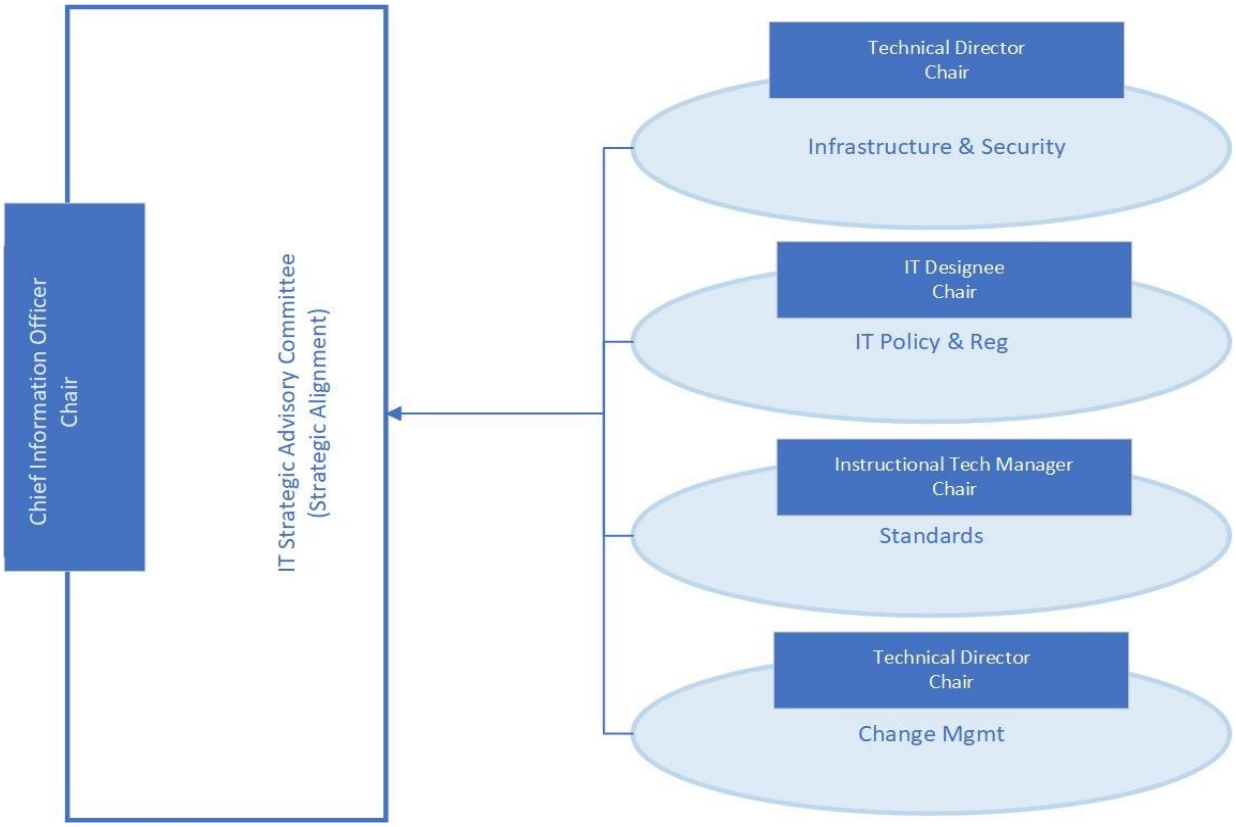
INFORMATION TECHNOLOGY **Regulation 8100**

Introduction and Governance

The Board of Trustees authorizes the use of information technology to support an effective and efficient environment for high-quality instruction and information and to enhance communication, access, and the College's ability to meet the needs of students and other stakeholders.

The Information Technology Services Advisory Committee (ITSAC) provides institutional strategic alignment by establishing priorities and recommending policies and regulations, and is accountable and transparent to the college community. The ITSAC, including subcommittees, advises the Chief Information Officer. The Chief Information Officer submits recommendations to the President, the Executive Leadership Team, or College Council as appropriate.

IT Governance is comprised of the main governing body (ITSAC) and subcommittees. The subcommittees make recommendations to the ITSAC. This committee shall meet as needed to review all recommendations of the subcommittees. The structure is as follows:



1. Information Technology Services Advisory Committee
2. Infrastructure and Security
3. IT Policy and Regulations
4. Standards
5. Change Management

Additional ad hoc task forces may be formed for special purposes.

The IT governance structure and responsibility:

1. Information Technology Services Advisory Committee (ITSAC)
    a. Meeting frequency: as needed.
    b. Chairperson: Chief Information Officer
    c. Agenda: Developed by chairperson, distributed two days prior to scheduled meeting.
    d. Document and review IT Service Catalog.
    e. Overseeing the development and prioritization of a two-year technical roadmap.
    f. Routinely measuring and monitoring the Return on Investment (ROI) of new and ongoing technology service or solution initiatives.
    g. Review and approval of recommendations of subcommittees for alignment with IT tactical and strategic plans, as well as institutional strategic plan and initiatives.
    h. Document and submit committee recommendations to the president, Executive Leadership Team (ELT), or College Council as appropriate.
2. Infrastructure and Security (ITSAC-I)
    a. Meeting frequency: monthly or as needed.
    b. Chairperson: IT Designee
    c. Agenda: Developed by chairperson, distributed two days prior to scheduled meeting.
    d. Develops, recommends and evaluates technologies for the development, support, management, and maintenance of the college IT infrastructure.
    e. Creates task forces to investigate and to develop recommendations for college-wide IT infrastructure initiatives, when appropriate or necessary.
    f. Identifies and assesses college cyber security, privacy and compliance needs and assist with their development and implementation.
3. IT Policy and Regulations (ITSAC-P)
    a. Meeting frequency: based on annual review schedule.
    b. Chairperson: IT Designee
    c. Agenda: Developed by chairperson, distributed two days prior to scheduled meeting.
    d. Evaluates, authors, reviews, and recommends to ITSAC information security regulations that address risk and align with applicable federal and state regulations, as well as college policy, insurance and compliance requirements.

e. Evaluates, authors, reviews, and recommends to ITSAC technology use regulations that address risk and align with applicable federal and state regulations, as well as college policy, insurance and compliance requirements.
f. Evaluates, authors, reviews, and recommends to ITSAC enterprise applications use regulations that address risk and align with applicable federal and state regulations, as well as college policy, insurance and compliance requirements.
g. Evaluates, authors, reviews, and recommends to ITSAC instructional and academic technology regulations that address risk and align with applicable federal and state regulations, as well as college policy, insurance and compliance requirements.
h. Create task forces to investigate and develop recommendations for policy and regulation on new or emerging technologies, when appropriate or necessary.

4. Standards (ITSAC-S)
    a. Meeting frequency: quarterly, or as needed.
    b. Chairperson: Instructional Technology Manager
    c. Agenda: Developed by chairperson, distributed two days prior to scheduled meeting.
    d. Supports the development and maintenance of standards that enable a college-wide technology deployment that can be efficiently and strategically managed.
    e. Establishes standards that formally guide the acquisition, maintenance and operations of information technology systems and infrastructure to make sure they are available, secure, cost effective and interoperable (as appropriate to business and academic requirements).
    f. Create task forces to investigate and develop recommendations for college-wide IT hardware, software, and infrastructure initiatives, when appropriate or necessary.
5. Change Management (ITSAC-C)
    a. Meeting frequency: Monthly, or as needed.
    b. Chairperson: IT Designee
    c. Agenda: Developed by chairperson, distributed two days prior to scheduled meeting.
    d. Ensures that standardized methods and procedures are used for technical changes.
    e. Minimizes the impact of change-related incidents upon service quality, and consequently improves the day-to-day operations of the organization.
    f.

IT Governance Values

The IT governance committees will use the RACI responsibility model.

- R – Responsible: Governance structure must focus on decision-making and results more so than implementation and project management.
- A – Accountable: Committees and task forces must be held accountable for delivering on their responsibilities. Clear escalation paths for issue resolution must be defined and outlined in charter documentation.

- C – Consulted: Governance committees work with and in all areas of the college with the purpose of understanding expectations.
- I – Informed: Communication must occur into, out of, and across the committees and with campus.

Additional values include:

- Transparency: Governance structure and process must be clear. How decisions are made and how users communicate with ITSAC must be readily apparent to campus.
- Appropriate Representation: Constituency groups across campus must be represented.

The ITSAC membership includes the following members:

- Chief Information Officer, chair
- Designee appointed by the Vice President for Finance and Administration
- Faculty designee appointed by the Vice President of Academic and Student Success
- Technical dean or department chair designee appointed by the Vice President of Academic and Student Success
- Institutional Research Director or designee appointed by the Executive Director of Institutional Effectiveness
- Professional staff designee appointed by the Dean of Student Services
- Classified staff designee appointed by the Dean of Student Services
- Designee appointed by the President
- ITS managers, non-voting, ex-officio

(Revised 3/2019; 04/09/24)

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INFORMATION TECHNOLOGY **Regulation 8200**
(Policy 8200)

Appropriate Use

State Fair Community College (SFCC) shall provide technological resources to the campus community of students, faculty, staff, and the public to support its educational mission. SFCC technology can provide access to resources on and off campus, as well as the ability to communicate with other users worldwide. This access is a privilege and requires that individual users act responsibly. Users shall respect the rights of other users, respect the integrity of the systems and related physical resources, and observe all relevant laws, regulations, and contractual obligations. SFCC technological resources shall always be used in compliance with all international, federal, state, and local laws.

This regulation applies to all users of SFCC technological resources including faculty, staff, students, guests, external individuals or organizations and individuals accessing external network services, such as the internet via college facilities. Preserving the access to information resources is a community effort that requires each member to act responsibly and guard against abuses. Therefore, both the community as a whole and each individual user have an obligation to abide by the following standards of acceptable and ethical use:

- Use only those technological resources for which you have authorization.
- Use technological resources only for their intended purpose.
- Protect the access and integrity of technological resources.
- Abide by the applicable laws and college policies and respect copyrights and intellectual property rights of others, including the legal use of copyrighted software.
- Respect the privacy and personal rights of others.

Failure to comply with the appropriate use of these resources threatens the atmosphere for the sharing of information, the free exchange of ideas and the secure environment for creating and maintaining information property and subjects one to discipline. Any member of the college community found using technological resources for unethical and unacceptable practices has violated this policy and is subject to disciplinary proceedings including the suspension of system privileges, expulsion from school, termination of employment, and/or legal action as may be appropriate.

SFCC reserves the right to limit or restrict the use of its technological resources based on institutional priorities and financial consideration, as well as when it is presented with evidence of a violation of college policies, contractual agreements, or state and federal laws.

Although members of the community have an expectation of privacy, if a user is suspected of violating this policy, their right to privacy may be superseded by the college's requirements to protect the integrity of technological resources, the rights of all users and the property of the college. The college, thus, reserves the right to examine material stored on or transmitted through its facilities if there is cause to believe that the standards for acceptable and ethical use are being violated by a member of the college community. See Regulation 8210 Access to Accounts and Information.

User Responsibilities

Use of college technological resources is granted based on acceptance of the following specific responsibilities:

- Use only those technological resources for which you have authorization.
  For example: it is a violation
  - to use technological resources you have not been specifically authorized to use.
  - to use someone else's account and password or share your account and password with someone else to access files, data or processes without authorization.
  - to purposely look for or exploit security flaws to gain system or data access.

- Use technological resources only for their intended purpose.
  For example: it is a violation
  - to send forged electronic messages including but not limited to e-mail or instant messaging.
  - to hide their identity, or to interfere with other systems or users.
  - to use electronic resources for harassment or stalking other individuals.
  - to send bomb threats or "hoax messages."
  - to send SPAM or Phishing messages to intercept or monitor any network communications not intended for you.
  - to use technological resources for advertising or other commercial purposes.
  - to attempt to circumvent security mechanisms.
  - to use privileged access for other than official duties.
  - to use former privileges after graduation, transfer or termination.

- Protect the access and integrity of technological resources.
  For example: it is a violation
  - to distribute a virus, ransomware, malicious script, malicious program or worm that damages, harms or compromises a system or network.
  - to prevent others from accessing an authorized service.
  - to attempt to deliberately degrade performance or deny service.
  - to corrupt or misuse information.
  - to alter or destroy information without authorization.

- Abide by applicable laws and college policies and respect the copyrights and protected intellectual property rights of others.
  For example: it is a violation
  - to make more copies of licensed software than the license allows.
  - to download, use or distribute without permission copyrighted software.
  - to operate or participate in pyramid schemes.
  - to distribute pornography or to upload, download, distribute or possess pornography in public spaces.
  - to distribute, download or possess illegal content including but not limited to images, video, audio, files or software.
  - to not abide by all licensing agreements or terms of use applicable to technological resources.

- Respect the privacy and personal rights of others.
  For example: it is a violation
  - to tap a phone line or run a network sniffer without authorization.
  - to access or attempt to access another individual's account or data without explicit authorization.
  - to intercept or possess another individual's authentication factor including but not limited to passwords and tokens.
  - to access or copy another user's electronic messages, data, programs, or other files without permission.

- Report suspicious or unlawful activity, system defects/bugs, or policy and regulation violations to Information Technology Services (ITS).
- Users are expected to cooperate with any investigation of policy or regulation abuse.
- Handle college data in accordance with Policy and Regulation 8400.

System Administrator Responsibilities
System administrators and providers of college computing and information technology resources have the additional responsibility of ensuring the integrity, confidentiality, and availability of the resources they are managing. Persons in these positions are granted significant trust to use their privileges appropriately for their intended purpose and only when required to maintain the system. Any private information seen in carrying out these duties must be treated in the strictest confidence, unless it relates to a violation or the security of the system.

Security Caveat
Be aware that although technological resource providers are charged with preserving the integrity and security of resources, security sometimes can be breached through actions beyond their control. Users are therefore urged to take appropriate precautions such as safeguarding their account and password, taking full advantage of file security mechanisms, backing up critical data using approved tools and promptly reporting any misuse or violations of the policy.

Violations
Every member of the college community has an obligation to report suspected violations of the above guidelines or of the Information Technology Policies - 8000. Reports should be directed to the unit, department, school, or administrative area responsible for the system involved.

If a suspected violation involves a student, a judicial referral may be made to the Dean of Student Services. Incidents reported to the Dean will be handled through the college's Student Code of Conduct.

If a suspected violation involves a staff or faculty member a referral will be made to the individual's supervisor and the Human Resources Department.

(Revised 6/29/23)

Access to Accounts and Information

State Fair Community College (SFCC) offers electronic services and the use of its electronic equipment and systems, including but not limited to servers, computers, mobile devices, telephone systems, and cloud-hosted storage (collectively, "technological resources"), to students, faculty and staff for educational, research and administrative purposes in furtherance of its mission.
SFCC has the legal right to access, preserve, and review all information stored on or transmitted through its technological resources. SFCC endeavors to afford reasonable privacy for Users (as defined in Policy and Regulation 8200) and does not access information created and/or stored by Users on its technological resources except when it determines that it has a legitimate operational need to do so. Examples of legitimate operational needs include, but are not limited to, the "reasons for access" articulated in Reasons for Access.

If SFCC determines, in its sole judgment, that it requires access to the account, device, or information of an individual user without prior notice to the user, SFCC may access the account, device, or information as provided in this Access to Accounts and Information Regulation 8210 and document the transaction for compliance purposes.

Who Is Affected by This Policy

This Regulation applies to all students, faculty and staff. It also applies to all other individuals and entities granted use of SFCC's technological resources, including, but not limited to, contractors, temporary employees, volunteers, and the public (collectively, "Users").

Reasons for Access

SFCC may access User accounts and information when, in SFCC's sole judgment, doing so is reasonably necessary to achieve a legitimate operational need. Examples of such needs include, but are not limited to:

- evaluating or responding to health or safety risks
- ensuring continuity of operations during the unavailability of a user unexpectedly or for a prolonged period, or after the departure or death of a User
- when necessary to identify, diagnose or correct technological resources security vulnerabilities and problems, or otherwise preserve the integrity of technological resources
- investigating a possible violation of law or SFCC policy and regulations
- complying with federal, state, or local law or rules
- complying with validly issued subpoenas, governmental information requests, warrants, court orders, and discovery obligations in a pending or reasonably anticipated legal proceeding. In securing such access, SFCC officials will follow the request and approval procedures described in Procedures for Access.

Procedures for Access

The following procedure will be implemented when the college needs to access, preserve or review a User's electronic account or information.

For business continuity needs

Whenever access to information or resources stored in an SFCC IT system is temporarily unavailable due to the absence of a User, and immediate access is necessary to accomplish an institutional objective or program, an administrative leader for the affected department (department chair, director, or equivalent) submits an Access Request and includes the following information:

- the name of the account holder whose existing information is to be exported, accessed or shared
- the reason why the access and data is needed
- the precise description of the information needed, including a date range

Information Technology Services (ITS) receives the request and confers with the requestor as needed and seeks approval as follows:

- for employees, an email is sent to the Executive Director of Human Resources or designee for review and approval.
- for students, an email is sent to the Dean of Student Services, FERPA Officer, or designee for review and approval.

ITS will use a ticket request for documentation purposes. ITS staff will promptly and confidentially access the account or information to provide the department leader a copy of the requested information. Depending on the circumstances and when necessary for business continuity needs, ITS may provide access to an account (for example, if the requester requires access to an Outlook calendar) and/or arrange for the temporary forwarding of emails to another email account.

For requests other than business continuity needs

Requests should flow to ITS (via email at networkservices@sfccmo.edu) through an authorized college official, as follows:

- for employees, an email is sent to the Executive Director of Human Resources or designee for review and approval, who then provides the official request to ITS.
- for students, an email is sent to the Dean of Student Services, FERPA Officer, or designee for review and approval, who then provides the official request to ITS.
- for legal issues, an email is sent to the President's Office or designee for review and approval, who then provides the official request to ITS.
- for safety or security requests, an email is sent to the President's Office or designee, who then provides the official request to ITS.

The Access to Accounts and Information Form should be used to provide the official request to ITS. Before the requested information is provided, Human Resources must evaluate the request of the respective Dean or Vice President or their designee and concur that it is consistent with applicable laws and college policies. Once the Chief Information Officer (CIO) or designee has received the approved request and verified authorization from the appropriate authorized college official, the CIO or designee will work with the appropriate technical personnel to implement the request.
The CIO will follow instructions from the appropriate authorized college official regarding the preservation and archiving of requested data, and will document the request, disclosure details, the name and title of the requestor, and the reason for the request.

*No restricted or confidential information is ever to be documented in the ticketing system. Requests must be reviewed and, if necessary, modified to ensure confidentiality.

Requesting "Out of Office" Messages for an Unavailable Employee

When an employee is unexpectedly unavailable to receive and respond to email, and legitimate operational needs require continuity of communication, an administrative leader from the employee's department (department chair, director, or equivalent) or Office of Human Resources Manager has the authority to request ITS to enable an "Out of Office" message from the employee's email account by submitting an "Out of Office" request to the Help Desk.
ITS receives the request and confers with the requestor as needed. ITS will use the ticket request for documentation purposes. ITS staff will confidentially access the email account for the sole purpose of creating and enabling the "Out of Office" message. The technical staff notifies the CIO and the original requestor, schedules the removal of the "Out of Office" message per the agreed upon date, and then closes the ticket.

Definitions

Phishing - The fraudulent practice of sending emails or other messages purporting to be from reputable companies or individuals in order to induce individuals to reveal personal information, such as passwords, bank accounts or credit card numbers.

Private space - Personal residence rooms in the Residence Halls.

Public space - All spaces not considered private space.

SPAM - Unsolicited usually commercial messages such as emails, text messages, or Internet postings.

Technological resources- SFCC offers electronic services and the use of its electronic equipment, systems and applications, including but not limited to servers, computers, mobile devices, wired and wireless networks, telephone systems, and cloud applications and services

(Approved 6/29/23)

Access

Computing and networking resources shall be provided for the educational, academic, and administrative purposes of the college. Some computer labs, networks, systems, and other resources shall be restricted to students who are enrolled in specific courses or programs or employees who have specific work assignments. Computer users shall learn and follow the access regulations for each resource used and shall use the resources appropriately and consistently with access regulations.

The use of these computers/networks/applications is a privilege granted to members of the college community. When using this account, you are agreeing to:

1. Take no actions which violate the Information Technology Appropriate Use Regulation 8200, Employee Handbook, or other applicable policy or law.
2. Use these resources only for purposes consistent with the college's mission and applicable policy or law. Inappropriate use includes, but is not limited to:
    a. sending harassing messages or in any way harassing other computer users
    b. gaining OR attempting to gain access to accounts or files without permission on any computer or network system
    c. making unauthorized copies of any copyright protected software, or other copyrighted or trademarked material, regardless of source
    d. taking actions which threaten the security or capacity of computer or network systems, or which destroy, damage or overload these resources
    e. violating any applicable law or policy

Failure to abide by these policies will result in revocation of your privileges to use computing and network resources. Although we have backup procedures in place for shared systems, use of these resources is at your own risk since recoverability and security of data cannot be guaranteed. Files, data and disks may be considered SFCC property and are therefore subject to access by the college. Certain data may also be subject to access pursuant to Missouri Public Records statutes, via subpoena, or consistent with other state or federal law including but not limited to FERPA and GLBA.

Definitions

FERPA – Family Educational Rights and Privacy Act of 1974 otherwise known as the Buckley Amendment.

GLBA – Gramm-Leach-Bliley Act.

(Revised 2/2023; 05/07/24)

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Authentication

Authentication is the process by which users or service accounts provide proof of who they claim to be. State Fair Community College (SFCC) shall maintain authentication services that securely identify users and service accounts to minimize the chance of improper authentication.

Authentication Level

Authentication levels used are dependent upon data and system classification within Regulation 8400. Authentication levels must be implemented whenever technically possible. All exceptions to the regulation must be documented as part of a risk assessment. Authentication levels must be considered during the procurement of new systems and upgrades of existing systems.

Strong Authentication

Strong authentication is the requirement to use multiple factors to verify the identity of a user accessing networks and/or applications, as opposed to the traditional method which requires only one factor of authentication (username and password solely).

Standard Authentication

Standard authentication is the requirement to use a single factor to verify the identity of a user accessing networks and/or applications typically requiring username and password solely.

No Authentication

No authentication does not have the requirement to use factors to verify identity of a user for accessing public information.

Authentication time out and Re-authentication

Authentication time-out and re-authentication are necessary to prevent unauthorized use through stealing open sessions both physically (leaving a computer unlocked) or virtually (session hijacking). SFCC-managed computers and laptops are locked after 15 minutes of inactivity or when the computer goes to sleep (whichever occurs first). Confidential and internal data must use strong authentication with an idle time-out of no more than 75 minutes.

Encryption

All authentications must be configured with encryption using industry standards and best practices.

Authenticators

When feasible authenticators must use the listed authentication methods against the SFCC Active Directory through Single-Sign-On (SSO).

Preferred authentication methods (in preferential order):

- Single-Sign-On (SSO)
  - SAML2.0
  - Azure/ADFS
- TACACS
- RADIUS

Acceptable but less desirable:

- LDAPS (Secure Lightweight Directory Access Protocol)

MFA (Multi-Factor-Authentication)

Strong authentication counters the weaknesses inherent in traditional, one-factor authentication methods because they are:

- Harder to duplicate
- Cannot be re-generated
- Cannot be easily guessed
- Cannot be re-used
- Physically stored independently from the other factor of authentication, thereby deterring simultaneous use by an unauthorized user

Accepted MFA methods:

- Hardware OTP (one-time passphrase)
- Software OTP
- SMS (text messaging)
- Voice Call
- U2F AuthN
- Biometric

Lost or stolen MFA hardware including hardware tokens, cell phones and SIM chips must be reported immediately to Information Technology Services (ITS) for deactivation or revocation.

When using a cell phone for MFA a security lock screen should be set.

Password policy

Passwords are made up of various alpha numeric characters, which can be broken down into four-character groups. These are uppercase alphabetic, lowercase alphabetic, numeric, and special characters. Increasing the length and complexity of passwords increases the time necessary to crack passwords exponentially.

Passwords must:

- Contain:
  - English Uppercase Alphabetic (A - Z)
  - English Lowercase Alphabetic (a - z)
  - Numeric digits (0 – 9)
  - Special characters (e.g., exclamation point [!], dollar sign [$], pound sign [#], percent sign [%], asterisk [*], etc.)
- Be at least 12 characters

Good password ideas:

- Long unique phrases
- Multiple random words
- Random passwords generated by an approved password manager

Bad/prohibited passwords:

- Directory information such as your name, address, date of birth, username, nickname, or any term that could be easily guessed.
- Related to the job or personal life, e.g., not a license plate number, spouse's name, telephone number, etc.
- Commonly used passwords (e.g., p@ssw0rd, etc.).
- Proper names or places.
- Characters that are fixed combined with characters that predictably change. For example, users may not choose passwords like "boxtop01" and "boxtop02" or "x345JAN" and "x345FEB", etc., or identical or similar passwords the user previously chose.
- Keyboard paths or patterns such as "12345678" or "qwerty."

Password Lifetime Requirements

The purpose for requiring password lifetime restrictions is to prevent users from using their favorite password until it expires and changing their password more times than the system remembers, and cycling back to their favorite password, thus circumventing the system.

Password Expirations

- Accounts using standard authentication must reset their password on a regular basis according to industry best practices.
- Accounts protected with strong authentication are exempted from password expiration.

Password Length

All passwords shall be at least 12 characters in length, except within legacy systems that cannot support 12-character passwords.

Password Ownership Requirements

Passwords for all systems are subject to the following password ownership rules:

- Users shall not disclose their password to anyone. ITS employees will never ask for a user's password.
- If passwords must be sent electronically, the corresponding username must be sent over a different electronic communication to avoid interception.
- User-initiated password reset shall be supported by systems.
- Systems must be configured to log all password resets by users and administrators.
- Password reset requires identity verification.
- Only authorized individuals shall be granted rights to reset other users' account passwords.

Password Storage Requirements

- Systems are to store passwords using industry encryption best practices.
- Passwords must not to be stored in clear text.

Password Managers
A password manager is a program that encrypts and stores usernames and passwords for multiple applications and systems under a single username and password. Contact ITS for a list of approved password managers.

Login Failure Limits
Systems must be configured to limit the number of login failures resulting in account lockout. Login failure limits prevent "brute force" attacks.

Definitions

Active Directory Federation Service (ADFS) – is a software component created by Microsoft to provide Windows Server operating systems Single Sign-On to users. It is a feature that allows sharing of identity information outside a company's network.

Authenticator – The means used to confirm the identity of a user, processor, or device (e.g., user password or token).

Authentication – Verifying the identity of a user, process, or device, often as a prerequisite to allowing access to resources in an information system.

Authentication Factor – A security credential such as a password, PIN or token that is used to prove the identity of a user. Factors may include something you know, something you have or something you are.

Microsoft Active Directory – is Microsoft's centralized identity-based identity-services system. Active Directory uses multiple protocols to authenticate and manage user and computer accounts, services, and resources.

Multi-Factor Authentication (MFA) – Authentication using two or more distinct factors to achieve authentication. Factors include: (i) something you know (e.g., password/PIN); (ii) something you have (e.g., cryptographic identification device, or token); or (iii) something you are (e.g., biometric).

One Time Passphrase (OTP) – May include various methods to electronically verify possession of a physical device or identity. Examples of which are cryptographically synchronized numbers (PINs) or tokens that are provided via SMS, voice or mobile applications.

Password Manager – is a program that encrypts and stores usernames and passwords for multiple applications and systems under a single username and password.

Remote Authentication Dial-In User Service (RADIUS) and **Terminal Access Controller Access-Control System (TACACS) –** are protocols that enable network devices and applications to communicate with a central server to authenticate remote users, authorize their access t the requested system, and record accounting of the activity. Wherever possible, SFCC uses these protocols in combination with MFA to further secure these connections.

Secure Lightweight Directory Access Protocol (LDAPS) – is a protocol that uses SSL (Secure Sockets Layer) or TLS (Transport Layer Security) to encrypt and authenticate the data exchanged between an LDAP client and an LDAP server. SSL and TLS are cryptographic protocols that create a secure channel between two parties, preventing eavesdropping, tampering, or forgery. When using LDAPS, the client and the server establish a SSL/TLS session before sending any LDAP requests or responses. This way, the data is protected from interception and modification by anyone who does not have the proper credentials.

Security Assertion Markup Language (SAML) 2.0 – is an open standard created to provide cross-domain single sign-on (SSO). In other words, it allows a user to authenticate in a system and gain access to another system by providing proof of their authentication.

Standard Authentication – is the requirement to use multiple factors to verify the identity of a user accessing networks and/or applications, as opposed to the traditional method which requires only one factor of authentication (username and password solely).

Strong Authentication – is the requirement to use multiple factors to verify the identity of a user accessing networks and/or applications, as opposed to the traditional method which requires only one factor of authentication (username and password solely).

System or Service Account – An account used for single purposes such as running programs in a scheduled or automated manner.

Terminal Access Controller Access-Control System (TACACS) – see Remote Authentication Dial-In User Service (RADIUS).

U2F AuthN – Universal 2nd Factor Authentication standard.

(Added 2/2023; Revised 05/07/24)

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Identification

Securely and uniquely identifying individuals who make use of SFCC resources helps ensure that access to information and resources can be limited to those individuals who have a legitimate reason. All users will be assigned a unique identity to securely authenticate to SFCC information technology resources to which they have been authorized.

The SFCC unique identity is a Microsoft Active Directory username. Usernames are created by Banner and fed to Active Directory and other systems through automation. Alternative unique identifiers may be used by systems if they are linked backed to the Active Directory username.

System and/or application administrators may be issued additional unique identities for the separation of administrative job functions, roles and rights from their "standard" SFCC unique identity. The purpose of this is to limit security risks from compromised systems and accounts.

A system or service account is an account used by an application to interact with the operating system. System/service accounts may be used under these conditions:

- Documentation for the account must include usage, purpose, lifecycle and ITS owner
- Password changed as needed
- Monitored through auditing/logging
- Single use
- Annually reviewed
- Decommissioned at end of the lifecycle

Definitions

Identification – The method of uniquely identifying a user of a system or application.

Microsoft Active Directory – Microsoft's centralized identity-based identity-services system. Active Directory uses multiple protocols to authenticate and manage user and computer accounts, services, and resources.

System or Service Account – An account used for single purposes such as running programs in a scheduled or automated manner.

(Added 2/2023; Revised 06/11/24)

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Authorization

The SFCC unique identity shall be issued after the request is authorized appropriately and documented adequately. SFCC unique identities shall be deactivated, disabled and/or deleted as soon as reasonably possible after authorized notification of termination of contract, employment, or relationship with the college. Access to information in information technology system resources will be granted on a "need to know" or "minimum necessary" basis and must be authorized by the immediate information owner.

User Authorization should be based on "least privilege"

User authorization access control procedures should require:

- Documented procedures which facilitate the implementation of the access control policy and associated access controls
- Access to the information system based on:
  - A valid need-to-know that is determined by assigned duties
  - Intended system usage
  - Data owner's and/or manager's approval

Account Life Cycle

SFCC unique usernames are generated by Banner through an automated process triggered upon student admittance, completion of the employee hiring process, or registration as contractors or associated staff. Usernames are disabled/deleted pursuant to table 1.

Guest access usernames are created with information provided at the time of the registration and are disabled and deleted within the guidelines below. Guest access usernames are considered temporary identification and provide limited access to unclassified data or services pursuant to Policy and Regulation 8400.

Table 1: Account Disable/Deletion Conditions

Account Type	Creation	Disabled	Delete
Student	**Condition:** Admitted as a Student **Processing period:** 24 hours	**Condition:** Not enrolled in courses. Registered but dropped all classes Death **Time period:** 12 months	**Condition:** Disabled and not enrolled in courses. **Time period:** 6 months
Pre-student /Fin Aid Appl	**Condition**: Started an application **Processing period:** 1 hour	**Condition**: Not fully admitted **Time period**: 12 months	**Condition:** Disabled **Time period:** 6 months
Access Only Students	**Condition:** Apply as access only for specific courses **Processing period:** 24 hours	**Condition:** End of course **Time period:** 1 term	**Condition:** No reenrollment for a term **Time period:** 1 term
Employee	**Condition:** Completion of Hiring process **Time period:** 1 hour	**Condition:** Last work date **Time period:** Immediate	**Condition:** Termination/retirement **Time period:** 6 Months
Affiliated Staff	**Condition:** Completion of HR paperwork **Time period:** 1 hour	**Condition:** Last work date **Time Period:** Immediate	**Condition:** Disabled **Time Period:** 6 months
Service	**Condition:** Application/service setup **Time period:** 1 hour	**Condition:** Termination of application/service **Time Period:** Immediate	**Time Period:** Quarterly review of disabled service accounts

Guest Wifi	**Condition:** Completion of online request **Time period:** Immediate	**Time Period:** up to 48 hours	**Time Period:** 48 hours
Guest Account	**Condition:** Account issued upon completion of online request **Time period:** Immediate	Condition: Password is reset when past the date entered in the request	n/a
Public	n/a	n/a	n/a

Definitions

Authorization - The official management decision given by an organizational official to authorize operation of an information system and to explicitly accept the risk to organizational operations (including mission, functions, image, or reputation), organizational assets, individuals, other organizations based on the implementation of an agreed-upon set of security controls.

Data Owner – See Regulation 8400.

Deleted Account – An account that has been removed from the system.

Disabled Account – An account that has been deactivated but still exists. It cannot be used unless re-enabled.

Identification – The method of uniquely identifying a user of a system or application.

System or Service Account – An account used for single purposes such as running programs in a scheduled or automated manner.

(Added 2/2023; Revised 06/11/24)

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Data Security and Retention

Data is necessary to conduct the business of State Fair Community College (SFCC). The life cycle of data includes collection, classification, responsibilities and access, storage and transmission, retention, and destruction of data. This regulation establishes the process, procedure and definition for each portion of the data lifecycle for the security and privacy of the constituents/community of the institution. All members of the SFCC community are responsible for protecting data in the lifecycle from unauthorized change, destruction, or disclosure. SFCC complies with all applicable laws and regulations regarding the dissemination and protection of data that is confidential including, but not limited to the Family Educational Rights and Privacy Act (FERPA) of 1974 and Gramm-Leach-Bliley Act (GLBA).

Violations of any part of this regulation may result in disciplinary action as prescribed by SFCC policies and regulations.

Prior to purchasing systems, resources, transmitting applications, or cloud services to be used for the purpose of storing or transmitting data, the tool must be vetted by ITS to verify it meets the technical requirements defined within Policy and Regulation 8400.

Data Lifecycle

Figure 1: Data Lifecycle

Collection

- All data ingested by the college must move through the data life cycle process.
- Data is evaluated and assigned to an appropriate existing business process. If no business process exists a new process must be created as defined in this regulation.
- Upon collection all appropriate care must be taken to securely receive and store the data if the data potentially will be classified as Internal Use or Confidential. Follow the appropriate Storage/Transmission requirements outlined in this regulation.

Classification

Maintaining and identifying the following information classifications for all college data:

Public

- Information or documents which are available to the public.
- For example, information hosted on the public website (www.sfccmo.edu), directory information (as defined per FERPA), press releases, policies and regulations, academic calendar, sports statistics, social media information…
- Collecting:
  - Security – no requirements
  - Assign Data Owner
- No security storage requirements

Internal Use Only

- Information or documents restricted for use within the college which relates to the institution's business. Computer generated reports listing students, employee and financial data are primarily for internal use only. Documents and data of this kind need not be kept under lock and key although reasonable care should be taken to keep it from public view. Precautions must be taken when these data are transferred to another individual or destroyed.
- This data may be available to the public per MO Sunshine Law.
- For example, but not limited to: work schedules, faculty roster, vendor information, business and operations information, electronic surveillance, salary information
- Any information that is reasonably not public
- Collecting:
  - Should be securely stored and transmitted
  - Assign Data Owner
  - Set retention policy
- Should be securely stored and transmitted during the entire life cycle

Confidential

- Personally Identifiable Information (PII) is data that would breach reasonable privacy expectations or data that could be detrimental to all members of the SFCC community if improperly disclosed. Regulated by law.

- These data are made available only to those individuals whose job responsibilities require such data. This kind of data, when printed on paper, must be kept under lockand key and carefully safeguarded. Precautions must be taken when these data are transferred to another individual or destroyed.

- Examples of PII, include but not limited to:
  - Student – FERPA, student data, criminal data, foster care, homelessness, applications and appeals
  - Financial PCI DSS – Credit Card data, bank account information, tax documentation and payroll
  - Health – Health data, HIPAA and ADA
  - HR (Human Resources) – criminal background checks and personnel records
- Collecting:
  - Must be securely stored and transmitted
  - Assign Data Owner
  - Set retention policy
- Must be securely stored and transmitted during the entire life cycle

Responsibilities and Access

- Staff who maintain data and handle computer-generated documents must:
  - Comply with all FERPA, HIPAA, GLBA, local, state, federal, and international laws
  - Use data and data access only as required in the performance of their jobs
  - Disclose Confidential and Internal Use Only data to other staff on a need-to-know basis
  - Exercise due care to protect data from unauthorized use, disclosure, alteration, and destruction
  - Utilize disk encryption software for all SFCC laptops, and for office PC and portable storage for Banner users (for example Bitlocker)
  - Follow established data processing practices, policies and regulations when using SFCC information systems including, but not limited to, the following:
    - Workstations are not to be left unattended after logging-in
    - Log off all public/lab workstations after use
    - Record passwords only in SFCC authorized password managers per Regulation 8310
    - Disclosing login account and password to anyone, including ITS personnel, is prohibited per Regulation 8310
    - Encrypt confidential and Internal use only data when transmitting data.
    - Will not use 3rd party unapproved systems
- Selling or transferring e-mail addresses, mailing labels, or other serial data to outside agencies or vendors is prohibited unless approved by the President's Office.
- Institutional Research (IR) is responsible for sending external reporting data to off-campus entities. Data reported externally should be validated with the Data Owner and/or IR prior to release.
- Public data is to be released/published in accordance with Marketing and Communications (MarComm) Policy and Regulation 9000.
- Institution-wide statistical data must be validated by IR including but not limited to:
  - Survey date definitions
  - Source for "official" federal, state, IPEDS (Integrated Postsecondary Education Data System), accreditation comes from each department, but IR coordinates gathering the data between multiple departments.
  - Read only access to data.
  - Extracts data – Data Analyzer – analysis/reporting

- Data custodianship defined by State, Federal, and international regulations and laws supersede roles defined within this regulation.

  Roles
  - **Data User** – Employees who have access to internal use only and confidential data in order to conduct college business and operations. Data Users encompass Data Executives, owners, stewards, analyzers, and custodians; Data Users also include faculty or staff who access internal use only and confidential data.

    Typical responsibilities include:

    - Understanding and complying with college policies and regulations for the access, use, disclosure, and protection of institutional data.
    - Alerting Data Owners to data discrepancies, inaccuracies or data validation concerns.
    - Alerting Data Owners and custodians immediately to any security incidents.
  - **Data Executive** – Employees who are the highest-ranking individuals accountable for what happens with and to college data. Data Executives are usually administrative-level positions, including but not limited to, the president of the college or other designated employee(s).

    Typical responsibilities include:

    - Providing authority for setting policies and regulations related to data use and oversight.
    - Addressing data-related issues that escalate to the highest level.
    - Authorizing the release of confidential and internal use data, per applicable regulatory and legal requirements, to outside entities.
    - The legal custodian of the information remains responsible for ensuring that data constituting a college record is handled appropriately.
  - **Data Owner** – Employees who have planning and high-level responsibility for the management of data within their functional areas. Data Owners are usually vice presidents, deans or directors.

    Typical responsibilities include:

    - Authorizing access to Data Stewards.
    - Ensuring the data collected are accurate, reliable and properly captured.
    - Addressing data discrepancies, inaccuracies or other data validation concerns.
    - Establishing processes for data collection and accountability.
    - Ensuring compliance with regulatory or other legal requirements.
    - Reviewing annual data access summaries and removing access from anyone who is no longer authorized.
  - **Data Steward** – Employees who use data as part of their assigned duties within the college. Data Stewards are usually subject matter experts on specific sets of data within their functional areas.

Typical responsibilities include:

- Entering, maintaining and manipulating data.
- Ensuring the data collected are accurate, reliable and properly captured.
- Alerting Data Owners to data discrepancies, inaccuracies, or other data validation concerns.

- **Data Analyzer** – Employees who are granted access to data for analysis and reporting purposes. Data Analyzers are usually, but not limited to, employees within the IR department.

  Typical responsibilities include:

  - Practicing due diligence in ensuring data reported are accurate, reliable, and in compliance with regulatory or other legal requirements.
  - Alerting Data Owners to data discrepancies, inaccuracies, other data validation concerns, and new reporting requirements.
  - Working with Data Owners to meet "official" data definition requirements for the purpose of reporting/surveying.
  - Assisting Data Owners in defining data collection processes as related to outcome reporting and analysis.
- **Data Custodian** – Employees who are responsible for the maintenance and operation of systems that serve as repositories of institutional data. Data Custodians are usually, but not limited to, employees of the Information Technology Services department.

  Typical responsibilities include:

  - Providing a secure infrastructure in support of data management including, but not limited to, backup and recovery processes and secure transmission of data.
  - Granting access privileges to users as authorized by Data Owners.
  - Controlling levels of access to ensure individuals have access only to information for which they have been authorized, and that access is removed when no longer needed.
  - Installing, configuring, patching, and upgrading hardware and software used for data management.
  - Alerting Data Owners to data discrepancies, inaccuracies, and data validation or security concerns.
  - Building data systems to meet the classifications of data as well as Data Owner specifications.
  - Advising Data Owners regarding the data collection process, including but not limited to, assessing existing and future data structures, organization, systems and storage constraints.
  - Providing annual access summaries to Data Owners.
  - Note: It is not the responsibility of Data Custodians to disseminate data to anyone on or off campus. Data dissemination is the responsibility of Data Executives, owners, stewards, and analyzers within the constraints of their respective roles.

Storage and Transmission

Data is in one of two states:

- **At-rest -** stored physically or saved electronically somewhere.
- **In-motion -** being transmitted or moved between multiple places or electronic storage.

At-rest: storage

- Store information in repositories that cannot be accessed by unauthorized individuals.
- Physical media should be stored in locked drawers and cabinets when not in use.
- Encryption of all digital information is encouraged.
- Limit the number of copies of data to the minimum possible and do not retain longer than needed.
- Confidential data has specific requirements:
  - Data must be encrypted with the decryption key stored separately
  - Departments and Data Owners are responsible to comply with all applicable laws and regulations regarding the dissemination and protection of data that is confidential including, but not limited to the Family Educational Rights and Privacy Act (FERPA) of 1974 and GLBA.
  - An inventory of physical media containing confidential information must be maintained by the department in accordance with all applicable laws and regulations. The inventory must include the description, Data Owner, current location of the media, date of destruction (length of retention), the classification of data and the purpose for keeping the data.
- Secure data storage meets these requirements
  - Physical data (such as paper documents or removable media) must be kept under lock and key.
  - Electronic data must be encrypted using industry best practices when at rest.
  - Mobile devices storing secure data must be encrypted using industry best practices including but not limited to BitLocker.
- As Data Custodians ITS maintains backups of data on site, remotely and offline for DR.

In-motion: Physical Media Transmission

- Avoid printing confidential data unless necessary.
- Use care when printing to ensure the paper copies are not left unattended, for example on printers or desks.
- Shred printed copies when they are no longer needed.
- Ensure mailings are addressed carefully and sent in sealed envelopes.
- Do not save confidential or internal use data to unencrypted removable or unapproved physical media such as:
  - USB thumb drives
  - CD-ROM discs
  - External hard drives

In-motion: Electronic Transmission

- Encryption should be used during transmission.
- Confidential data must be encrypted during transmission.
- Use secure e-mail encryption systems when e-mailing confidential data.
- Avoid faxing confidential data.

- Use care to ensure paper copies are not left unattended when using fax machines and are promptly secured or shredded when no longer needed.
- Avoid saving or making extra copies of data outside of approved backup systems.
- Compensating controls must be formally documented and the reason for the exception.
- Maintain a network and computer system that provides safeguards against unauthorized access of these data.
- Maintain software and hardware encryption software for the enterprise.

Data Classifications

- **Public Data**
  - Data Security is not required.
- **Internal Use Data**
  - Should not save to "personal devices" such as thumb drive or personal phone.
  - Should be encrypted in-motion when transmitted over the Internal network.
  - Should be encrypted at-rest.
  - Must not be saved to non SFCC approved cloud or 3rd party systems.
  - Must be encrypted in-motion over the Internet.
  - Must be encrypted at-rest on mobile devices.
- **Confidential Data**
  - Should be encrypted in motion when transmitted over the Internal network.
  - Must not save to personal devices.
  - Must not be saved to non SFCC approved cloud or 3rd party systems.
  - Must be encrypted in-motion over the Internet.
  - Must be encrypted at-rest on mobile devices.
  - Must be encrypted at-rest on internal systems.

Retention

- Data should be retained for as long as is required to achieve the purpose for which data were collected and processed pursuant to GDPR (General Data Protection Regulation) Article 5.
- All data must have a retention definition.
- Data Owner must be aware of all legal requirements for retaining and documenting data.

Data Backups

- Information Technology Services maintains documentation on the back-up and retention procedures and ensures that those policies and procedures are followed consistently. The retention policy specifies the amount of time that a particular item of data can be recovered after it has been deleted but in no case shall it exceed 120 days for data, or 18 months for e-mail.
- Responsibilities
  - **Data Custodian**
    - The central IT organization at the college and at each college location will establish and publish retention schedules for any back-up and deleted data managed by those groups. This will include, but is not limited to, systems such as the central email servers and Banner.
  - **Data Executive and Owner**
    - The legal custodian of the information remains responsible for ensuring that data that constitutes a college record is handled appropriately.

- **Data Owners**
  - Administrative, academic and other divisions or departments that provide or manage central storage service for their users must document their back-up and retention policies or procedures.

Table 1: Data Backup and Archive retention periods

Type of Record	Description	Official Repository	Duration
communications	Employee E-Mail	Information Technology Services	18 Months
communications	Student E-Mail	Information Technology Services	0 Days
data	File Server	Information Technology Services	120 days
data	Log files	Information Technology Services	120 days
data	User files and databases stored on campus servers	Information Technology Services	120 days
communications	Phone call detail logs	Information Technology Services	120 days
communications	Voicemail	Information Technology Services	0 Days
communications	Instant Messaging	Information Technology Services	7 days

Data Archive

- All email sent to and received from employee SFCC email accounts are automatically archived for 18 months (sliding window). This is within the requirements for archiving of electronic communications in the regulation set forth by the Missouri Secretary of State, Section 109, RSMo.

Cloud Systems

- All cloud systems retention processes must be documented.
- Cloud systems should be configured to meet SFCC retention requirements.

Destruction

Once data and/or data systems have reached the end of their data life cycle, they will be destroyed per the following guidelines.

Follow all Missouri state and Federal laws, guidelines, and recommendation for destruction of physical media.

- Electronic files
  - When electronic records have reached the end of their data life cycle the record should be deleted.
- Physical Electronic Media Destruction
  - Follow all State laws, guidelines, and recommendation for destruction of physical electronic media.
  - Departments must ensure that tapes or other forms of media scheduled for destruction are disposed of properly. - non its managed systems.
  - Examples include but are not limited to:
    - Removable media such as usb thumb drives
    - Mobile device, computer and server hard drives

- Non-electronic Physical media
  - Departments are responsible for all physical paper destruction per all State and federal laws, guidelines, and recommendations for destruction of physical media.
  - Destroy paper media using a cross-cut shredder or similar appropriate technology and then recycle or discard.
  - Including but not limited to:
    - paper
    - microfiche records
- Data Archive
  - Configured to automatically delete based upon a sliding window.
- Data stored with a Cloud vendor
  - Document proof of destruction.

Definitions

3rd party systems - A vendor or entity not of SFCC.

All members of the community - Employees, students, alumni, donors, board members and volunteers.

Archive - Longer term storage of data after its active life.

At-rest - Electronic Information which is saved or stored physically in any electronic form (e.g., databases, data warehouses, spreadsheets, archives, tapes, off-site backups and mobile devices).

Authorization – See Regulation 8330. The official management decision given by an organizational official to authorize operation of an information system and to explicitly accept the risk to organizational operations (including mission, functions, image, or reputation), organizational assets, individuals, other organizations based on the implementation of an agreed-upon set of security controls.

Authentication – See Regulation 8310. Verifying the identity of a user, process, or device, often as a prerequisite to allowing access to resources in an information system.

Backup - (1) The process of making duplicate copies of electronic data, typically for security reasons. Different from the process of archiving a record. Backups of electronic information are made in case of equipment failure, etc. to ensure the availability of active records for ongoing administrative purposes. (2) A substitute or alternative. May refer to a disk or tape that contains a copy of data, or to a person authorized to act in the absence of another person.

Cloud - System or provider that stores SFCC data somewhere other than physically on an SFCC owned system.

Compensating controls - Alternative mechanisms that are put in place to satisfy the requirement for a security measure that is determined to be impractical to implement at the present time.

Data collection - Identifying and defining the process and framework for entering and accumulating data.

Data entry - Inputting & entering data into systems per defined collection process.

Disaster recovery (DR) - An organization's method of regaining access and functionality to its IT infrastructure after events like a natural disaster, cyber-attack, or even business disruptions related to the COVID-19 pandemic. A variety of disaster recovery (DR) methods can be part of a disaster recovery plan. DR is one aspect of business continuity.

Disk encryption software - Computer security software that protects the confidentiality of data stored on computer media (e.g., a hard disk, floppy disk, or USB device).

Encryption - Any procedure used in cryptography to convert plain text into cipher text to prevent anyone but the intended recipient or owner from reading that data.

FERPA - Family Educational Rights and Privacy Act of 1974 otherwise known as the Buckley Amendment.

GLBA - Gramm-Leach-Bliley Act.

GDPR - General Data Protection Regulation.

Hardware - Physical Server data storage, CPU, Memory, Network devices.

In motion - When data is transmitted between two systems either by a user or through automation.

Internal (local) - SFCC internal network main campus and remote campuses.

Internal systems - Systems and devices physically connected to the SFCC network.

IR – Institutional Research Department.

Log files - Computer-generated data files that contain information about usage patterns, activities, and operations within an operating system, application, server or another device.

Maintenance - Any act that either prevents the failure or malfunction of equipment or restores its operating capability.

Personal devices - Devices not directly owned by SFCC.

Personally Identifiable Information (PII) - information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

PCI DSS – Payment Card Industry Data Security Standard.

Retention – The act of keeping or storing information/data for a particular time period.

Sliding window – The concept in archiving data where the storage system is configured to automatically delete data past a certain time period such as 18 months from current date.

(Revised 2/2023 – RR)

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Data Security – Gramm-Leach-Bliley Act Safeguards Rule

This document describes how the college's information security program is in accord (and supports compliance) with the Gramm-Leach-Bliley Act Safeguards Rule (GLBA) and provides references to additional materials and for applicable policies and guidelines.

GLBA Objectives and Requirements

In compliance with the Gramm-Leach-Bliley Safeguards Rule and regulations issued by the Federal Trade Commission pursuant to that Rule, the college has established this Information Security Plan to:

- Ensure the security and confidentiality of customer information.
- Protect against anticipated threats to the security or integrity of customer information.
- Guard against unauthorized access to or use of customer information that could result in harm or inconvenience to any customer.
- Comply with applicable Gramm-Leach-Bliley rules as published by the Federal Trade Commission.

Consistent with its efforts to meet these objectives, the college will:

- Designate one or more staff members to oversee and coordinate the Information Security Plan.
- Conduct proactive risk assessments to identify foreseeable internal and external risks that could lead to unauthorized disclosure or misuse of confidential information.
- Implement plans to control the risks.
- Contractually require third-party service providers to implement and maintain confidentiality safeguards.
- Periodically evaluate and adjust the Information Security Plan to ensure ongoing protection of confidential information.

Coordination of the GLBA Information Security Plan

The following staff play a role in coordinating the various aspects of the information security plan:

- The Technical Director coordinates the college-wide Information Technology security program and assists units in their security implementation, in accordance with SFCC regulations 8300 and 8400.
- The Information Technology Services Advisory Committee (ITSAC), chaired by the Chief Information Officer, oversees the subcommittees IT Policy and Regulations (ITSAC-P) and Standards (ITSAC-S). The subcommittees evaluate specific GLBA-required standards to ensure they are incorporated into the plan. Any recommendations are made to the GLBA compliance Officer, the Director of Financial Aid.
- The Director of Financial Aid oversees compliance with the GLBA and receives and reviews all recommendations for change.

GLBA's required information security elements are addressed as follows:

Requirement		How/where addressed
1.00	Designates a qualified individual responsible for overseeing and implementing the institution's information security program and enforcing the information security program in compliance (16 CFR 314.4(a)).	See *Regulations 8300 Access*, *8310 Authentication*, *8320 Identification*, *and 8450 Gramm-Leach-Bliley Act*.
2.00	Provides for the information security program to be based on a risk assessment that identifies reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information (as the term customer information applies to the institution) that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assesses the sufficiency of any safeguards in place to control these risks (16 CFR 314.4(b)).	See *Regulations 8300 Access*, *8310 Authentication*, *and 8450 Gramm-Leach-Bliley Act*.
3.00	Provides for the design and implementation of safeguards to control the risks the institution identifies through its risk assessment (16 CFR 314.4(c)). At a minimum, the institution's written information security program must address the implementation of the minimum safeguards identified in 16 CFR 314.4(c)(1) through (8).	See *Regulations 8320 Identificatio*n and *8400 Data Security*.
4.00	Provides for the institution to regularly test or otherwise monitor the effectiveness of the safeguards it has implemented (16 CFR 314.4(d)).	See *Regulation 8200 Appropriate Use*. Additionally, the college uses a third-party tool to provide cyber awareness training, phishing testing, proactive risk assessments, and reporting. Routine tests are performed to assess and proactively prevent external and internal targeted threats.
5.00	Provides for the implementation of policies and procedures to ensure that personnel are able to enact the information security program (16 CFR 314.4(e)(1)).	See *Regulation 1525 Executive Leadership Team*.
6.00	Addresses how the institution will oversee its information system service providers (16 CFR 314.4(f)).	See *Regulation 8400 Data Security*. Additionally, the college oversees information system service providers via contractual agreements.
7.00	Provides for the evaluation and adjustment of its information security program in light of the results of the required testing and monitoring; any material changes to its operations or business arrangements; the results of the required risk assessments; or any other circumstances that it knows or has reason to know may have a material impact the institution's information security program (16 CFR 314.4(g)).	Testing is conducted monthly by an external service. Results are reviewed monthly by college staff, and action is taken upon high priority findings.

(Approved 10/2022; Revised 4/5/24)

Hardware and Software Approval, Purchasing, and Support

The college shall maintain a list of supported computer hardware and software. Purchases of products on the college's approved standards list will be supported by Information Technology Services (ITS) in terms of compatibility, installation, training, maintenance, troubleshooting, and upgrades. The Chief Information Officer will review and approve all purchases of hardware and software. Please go to the hardware and software purchasing standards web page for the up-to-date list of standards.

For software and hardware not included on the standards list, employees may request an exemption or a new standard through the Information Technology Services Advisory Committee – Standards Sub-Committee (ITSAC-S) by following the process outlined on ITS's hardware and software purchasing standards web page. If requesting an exemption, ITSAC-S can approve, and if requesting a new standard, the request will be forwarded to the Information Technology Services Advisory Committee (ITSAC) for approval. ITSAC-S's decision on an exemption may be appealed to ITSAC. ITSAC's decision on a new standard may be appealed to the Executive Leadership Team (ELT).

Purchasing and Support

Hardware and software fall into one of three categories: standard, Software as a Service (SaaS), or approved exemption. Purchasing and support varies for each category as follows:

Standard - Standard hardware and software must be quoted and purchased through ITS; however, no prior approval is required before purchasing. Standard hardware and software are fully supported by ITS.

Software as a Service (SaaS) - SaaS requires ITS involvement prior to selection and purchase in order to ensure compatibility, integration, and support.

Approved Exemption – Hardware and software exemptions must be approved by ITSAC-S. Prior to obtaining quotes, purchasers shall work with ITS to ensure compatibility and requirements are included. ITS support of approved exemptions is limited.

All other software and hardware purchased without ITSAC approval will not be supported.

Definitions

Approved Exemption (Software/Hardware) – Software/hardware that has been approved by the ITSAC-Standards Sub-committee; the department is responsible for purchasing and support of the hardware/software; ITS is responsible for limited support of approved exemptions

Cloud-Based Software – see *Software as a Service (SaaS)*

Hardware - The external and internal devices and equipment that enable you to perform major functions such as input, output, storage, communication, processing, and more. Examples include physical server data storage, laptops/desktop computers, monitors, printers, and network devices.

Software - A set of instructions, technically referred to as programs, that perform operations and specific tasks based on the commands of the user

Software as a Service (SaaS) - A method of software delivery and licensing in which software is accessed online via a subscription, i.e., cloud-based, rather than bought and installed on State Fair Community College devices; ITS involvement prior to selection and purchase is required to ensure compatibility, integration, and support.

Standard Software/Hardware - Software and hardware currently approved as a standard by ITSAC and supported by ITS

(Approved 3/26/24)

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Electronic Communications

The college provides electronic communication services, such as e-mail and collaboration tools, for faculty and staff to use when engaging in activities related to college business. Users shall accept and comply with the individual responsibilities relating to computer and information technology set forth in the State Fair Community College (SFCC) Appropriate Use Policy and Regulation 8200. Users are expected to read, and shall be presumed to have received and read, all official SFCC communications.

This regulation covers all uses of the college's electronic communication services. Any user of these services consents to all provisions of this regulation and agrees to comply with all the terms and conditions set forth herein, all other applicable college policies, regulations, and procedures, and with applicable local, state, and federal laws and regulations.

Users of college's electronic communication services whose actions violate this regulation, or any other college policy or regulation, may be subject to revocation or limitation of privileges as well as other disciplinary actions or may be referred to appropriate external authorities.

Acceptable Use:

SFCC provides electronic communication services for activities and associated administrative functions supporting its mission of learning, discovery, and engagement. Modest personal use of these services is allowed.
Policies and regulations that apply to other forms of communications at the college also apply to electronic communications. In addition, the following specific actions and uses of college electronic communication services are improper:

1. Concealing or misrepresenting names or affiliations.
2. Altering source or destination addresses.
3. Conducting commercial or private business for purposes that have not been approved.
4. Organizing or soliciting political activities.
5. Harassing or threatening of other individuals.
6. Degrading or demeaning other individuals.
7. Interfering with college activities or functions.
8. Disrespecting the image or reputation of SFCC.

Public Record and Privacy:

Any electronic communications may be public and may be subject to disclosure. SFCC does not monitor the content of electronic communications as a routine procedure. The college reserves the right to inspect, copy, store, or disclose the contents of electronic communications, but will do so only when these actions are necessary to:

1. Prevent or correct improper use of college electronic communication services.
2. Ensure compliance with college policies, procedures, or regulations.
3. Satisfy a legal obligation.
4. Ensure the proper operations of college electronic communication services or the SFCC data network. An SFCC administrator must first obtain the written approval of an appropriate administrative authority (Reference Regulation 8210 - Access to Accounts and Information) to inspect, copy, store, or disclose the contents of electronic communications.

Use of Electronic Communications for SFCC Business:

Because the contents of electronic communications are subject to laws governing public records, users will need to exercise judgment in sending content that may be deemed confidential. Transmissions, such as e-mail, may not be secure and contents that are expected to remain confidential should only be sent by secure methods. IT Services can provide guidance on secure methods of electronic communications. Common examples of confidential contents include the following: student grades, personnel records, individual donor gift records, data subject to the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Family Educational Rights and Privacy Act (FERPA) regulations, and the Gramm Leach Bliley Act (GLBA).
Broad-based or college-wide electronic communications are subject to all college policies, regulations, and procedures (Reference Regulation 9400 – Employee Communication).

Disclaimers of confidentiality included in electronic communications do not protect the sender if confidential information is shared or disclosed inappropriately.

Definitions

Collaboration Tool – software or application for real-time collaboration and communication, meetings, file and app sharing

Confidential Information – personal information shared for a designated purpose. Information shared cannot be used for personal gain or given to unauthorized third parties. Examples include but are not limited to the following: student grades, personnel records, or individual donor gift records.

Electronic Communications - any form of communication that's broadcasted, transmitted, stored or viewed using electronic media, such as computers, phones, email or collaboration tools.

(Approved 3.26.24)

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