

INFORMATION and GUIDELINES for HANDLING SENSITIVE and RESTRICTED DATA

Also check the following Purdue's web pages

<http://www.purdue.edu/securepurdue/policies/dataConfident/restrictions.cfm>

http://www.purdue.edu/registrar/FERPA/FERPA_.html

Please view rather than print this information.

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Information

The use of student data such as PUIDs, grades, etc. is covered by federal law (= FERPA) and state laws as well as Purdue rules. Purdue classifies student and other data in three categories:

- **public data:** information that may or must be open to the general public and can be disclosed without violating local, national and international legal restrictions
examples: course catalog, class meeting times
- **sensitive data:** information whose access must be guarded due to proprietary, ethical, or privacy considerations even though there may not be a civil statute requiring this protection
examples: date of birth, ethnicity, PUIDs
- **restricted data:** information protected because of protective statutes, policies or regulations or for which the "Information Owner" (which could be the student or Purdue University) has exercised his/her right to restrict access.
examples: students' academic records, social security numbers

Data on class lists and grade records is clearly to be considered sensitive. Purdue University not only requires its employees to treat sensitive and restricted data appropriately. This includes handling such data so that it does not become available to others by "accident". The following are examples (but by no means a complete list) of instances where an employee could be held responsible for the loss of sensitive data:

- the theft of or other forms of access by others to printed, faxed or electronically sent sensitive data
- the theft of a home computer, lap top, flash drive, etc. on which sensitive data is stored
- the theft of a home computer or lap top which contains "ghost" or "temporary" files created by software such as web browsers and that contain sensitive data (even if the actual data is not stored on the device)

The latter is hard to deal with since knowing which software does what behind the "scenes" is rarely well documented. Because of this the Department has guidelines in place on how instructors should handle class lists and grade related data. These guidelines, if followed, should minimize the risk to you. Please contact <http://www.math.purdue.edu/help> if you need technical help.

Please note that (to my knowledge) Purdue's guidelines have not addressed whether ensuring that sensitive data stored on a laptop (for example by using file fault on a Mac) is "treating sensitive data appropriately". Until this is (officially) clarified, I strongly recommend to assume the answer is "no".

Guidelines on what to do and not to do with class lists (and grade related data)

- **Download class lists** from *myPurdue* using the terminal in your office or one of the terminals in a departmental computer lab and while being logged on banach or hardy. Using a computer in a Purdue computer lab is acceptable. In any case, do not leave the computer unattended while logged in to *myPurdue*. When done, always log out of *myPurdue*, quit the browser application and log out of your terminal or computer session, even if using the terminal in your office.

Using other computers is not considered safe unless you only use them to access the departmental sunray servers - banach and hardy. Go to <http://www.math.purdue.edu/resources/computing/> for information on how to do this.

- **Store class lists and grade records** on the departmental servers or on a Purdue server managed by ITaP. We cannot vouch for servers kept by other departments.

Never store class lists or grade records on home computers, lap tops, flash drives or thumb drives, etc.

- **Enter grade related data** only while being logged on banach or hardy. Using a computer in a Purdue computer lab is acceptable. Do not leave the computer unattended while doing this. When done, always quit the application and log out of your terminal or computer session, even if using the terminal in your office.

Using software installed on other computers to enter grade related data might not be safe, even if the data is stored on a secure server. Some software programs create temporary or ghost files on the host computer. These files are not necessarily deleted when quitting the application or even logging out. ***In particular***, do not use a web browser on your home computer, lap top, etc. to enter grades in ***web-based on-line homework systems*** such as *WebAssign*.

- **Sending grade records** via unencrypted e-mail are not allowed under Purdue policies. Purdue's *FileLocker* is the recommended way to send sensitive data to other Purdue users. ***If you are a grader or recitation instructor, please ask the instructor first whether you sending grade records using FileLocker is acceptable.*** If there is a problem, send me e-mail (naughton@math.purdue.edu). Below are instructions for *FileLocker*

To ***upload*** a file to *FileLocker*:

- log on to banach or hardy
- in the web browser, type <https://filelocker.purdue.edu> - bookmark the page if used frequently
- login using your Purdue (career) login and password
- (the first time) read the terms to use *FileLocker* and, if you agree, click on "accept"
- you should get a page called "My Files" with some help links on the bottom right - you might have to scroll down to find them
- to upload a file, click on "upload"; you should get a new small window; follow the instructions
- after uploading the file, you should automatically be back in "My files" and see the file in a scrollable pane towards the middle of the screen
- click on the arrow on the right of the file line to get a drop-down menu; click on "share this file"
- a new small pop-up window will open; towards the right is a message "search for users by ..."; click on the "name" tab and start typing the first and last name of the person in the box underneath; choose the person's name from the dropdown list that appears as you type
- click on the "share" button; make sure the "notify by email" is chosen
- if everything is OK, the small window should close itself and you should be back to "My files" and be done - make sure to log out of *FileLocker*, quit the browser and log out of your terminal

To ***download*** a file to *FileLocker*:

- follow the same instructions as to upload a file to get to "My files"
- look for the file in the scrollable pane towards the middle of the screen; click on the arrow on the right of the file line to get a drop-down menu; click on "download"
- make sure to download the file to banach or hardy or an ITaP server, to log out of *FileLocker*, quit the browser and log out of your terminal

- **Print grade records** only if absolutely necessary. (It will be necessary to do so in order to turn them in to MATH 842 at the end of the semester.) Do not print them unless you are able to retrieve them immediately from the printer.

- **Paper copies of grade sheets** as well as **graded quizzes, homework** and **exams** contain sensitive data and must be handled carefully, even more so if they also have PUIDs on them. Do not let leave them in plain view on your office desk, or at home if you have housemates. Keeping offices locked when unoccupied is not only secures sensitive data but also reduces the theft of personal effects. TAs from other departments and Limited-Term Lecturers should not leave sensitive data in the offices they use since these offices are often kept unlocked and have a high occupancy.
- **Faxing grade records** is only allowed if the fax machine you are sending to has physical access controls so only the intended recipient may view the document. Therefore this method should used rarely and only with my express permission. If faxing is necessary, please send me e-mail (naughton@math.purdue.edu) before doing it, explaining why *FileLocker* cannot be used instead.
- **Disposing of sensitive data** should also be done "securely". There are secure paper recycling bins available in the department, for example on the 4th, 6th, 7th and the 8th floor. Keep in mind that exams must be kept until the deadline for a grade appeal is passed. The department recommends giving exams to MATH 242 for secure storage at the end of the semester.
- **Sending a student's grade by unencrypted e-mail** is forbidden under Purdue policy. Due to the level that Purdue holds individual instructors responsible, I strongly encourage you only to give a student his/her grade by using *FileLocker* and only if (a) the student asks for it by e-mail (= in writing) and (b) does so using a Purdue e-mail address that matches the e-mail address on the class list in *myPurdue*.

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