

# Tennessee College of Applied Technology McKenzie

## Institutional Information Security Plan

### Gramm-Leach Bailey Act Plan

The administration of the Tennessee College of Applied Technology McKenzie (TCATM) is aware of the importance and objectives of the Gramm-Leach-Bliley Act (GLB) with regard to its importance to activities, services, or programs which use information with identifiable student numbers such as Social Security Numbers and protecting such data from unauthorized access to a student or employee's financial information. It is likely in some areas of school operations that information is maintained or shared internally and with third parties, thus having the recognized danger for unauthorized access, breach of confidentiality, or at least weaknesses that should be addressed.

Campus departments and activities identified as those which may house or provide a gateway to identifiable student numbers or financial information include:

- Admissions
- Financial Aid
- Records and Grading
- Fiscal Operations.

Each of these areas must be reviewed and evaluated concerning current policies and procedures in regard to security of confidential information. This review and evaluation will include data stored and disposed of internally as hard copy and electronically. Third party access or transmission will also be addressed including review of contracts for language regarding the security of data.

During daily operations, it is often necessary to verbally communicate confidential information. It is important that all TCATM employees are aware of the risks of verbal communication and open viewing of computer screens to protecting confidential information. Training of TCATM staff and faculty will be conducted annually in regards to protecting confidential information.

#### Restrictions on Use of Information

The Tennessee College of Applied Technology McKenzie restricts access to nonpublic personal information about student and employee information to those employees, independent contracting agents, and other affiliated entities or individuals who need to know that information to provide services to you. Their right to further disclose and use that information is limited by our employee conduct rules, applicable law, and disclosure agreements where appropriate. The school maintains physical and electronic nonpublic personal information.

Physical Security

- All areas where files are maintained are behind closed locked doors when not in use.
- All documents containing sensitive information are destroyed in accordance with Tennessee Board of Regent's guidelines.
- School is protected by a video surveillance system.
- Security measures will be reviewed and tested annually.
- The school has no third party contracts. If any were entered into, the participant would have to adhere to Gramm-Leach Bliley Act.

GLB 2

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- School will maintain a close inventory of school's computers. Change password periodically; do not post passwords near computers.
- All calls or other requests for student and employee information should be forwarded to appropriate administrative personnel.