

CHANCELLOR'S CLARIFICATION

08-02

September 8, 2008

The Chancellor's Clarifications are presented as a series of explanations and reminders to ACC employees, vendors, students and others affiliated with our colleges regarding board policies, regulations, and administrative procedures and their implementation. Please retain the clarifications as a quick guide to ACC policies and procedures. As always, please let me know if you have further questions or recommendations for improvement.

TOPIC: EMPLOYEE AND STUDENT INFORMATION

PURPOSE:

To provide guidance on appropriate access to, and use and disposal of employee and student information

ACC SHARED VALUES: Integrity, Accountability

SCOPE:

All ACC employees and students

CLARIFICATION

All of us as members of the ACC have an obligation to act with integrity in the access to and use and disposal of student and employee information, including names, home addresses, birth dates, Social Security Numbers and other information that reasonable people consider sensitive and private. Some of our job duties require us to have access to individual student and employee information through paper documentation, the HRS (employee) and SIS (student) computer systems, and other sources. This information shall be accessed, used or released only in the performance of our assigned duties in carrying out official ACC business. Employees also shall not allow unauthorized access, viewing, use, or improper disposal of this information by anyone else.

Examples of prohibited actions include accessing or disclosing an employee's age or salary, or a student's financial aid information or class schedule, out of curiosity, or for any reason other than performing assigned duties in carrying out official ACC business.

Protecting employee and student information includes proper disposal methods. Employees, including workstudy students, must shred any document containing individual employee or student information before putting it into a wastebasket, dumpster, or recycle container, and transfer storage media (hard drives, flash drives, CDs, etc.) containing such information to the college or district services information technology (IT) department to be disposed of properly.

All requests for information must be handled according to the appropriate procedure. All public information requests must be transmitted immediately to the District Office of Legal Affairs for disposition.

CONSEQUENCES:

The unauthorized disclosure of student or employee information may in some cases make a person liable for civil and criminal penalties under federal and state law. Unauthorized access or release of such information may also result in loss of computer system access and other disciplinary action.

APPLICABLE LAW, POLICIES, AND OTHER REQUIREMENTS:

Note: The following is a representative list of references. It may not be a complete list.

FEDERAL LAW:

Family Educational Rights and Privacy Act (FERPA)
Health Insurance Portability and Accountability Act (HIPAA)

STATE LAW:

1 TAC §202 - Information Security Standards for Institutions of Higher Education

ACC CODE OF CONDUCT:

TRUSTWORTHINESS
STEWARDSHIP
CONFIDENTIALITY


ACC POLICIES:

FLB(LOCAL) - Student Rights and Responsibilities: Student Conduct

OTHER ACC GUIDELINES:

ACC Ethics Handbook: "Confidentiality", page 9
"Using Computer and Network Resources", page 20
ACC Employee Handbook: Section 701 "Employee Conduct and Work Rules"
ACC Acceptable Computer Use: "Appropriate Acceptable Computer Use", page 4

APPROVED:



Dr. Bruce H. Leslie, Chancellor