

Student Services Manual (SSM)

SSM 107–02: Lost, Stolen, or Inappropriately Disclosed Student Records Information

Effective: 1/27/2003 Revised: 7/1/2020

Purpose

To provide guidelines for reporting the loss, theft, or inappropriate disclosure of student education records containing personally identifiable information protected from disclosure by the federal *Family Educational Rights and Privacy Act of 1974*, as amended

Sources

Family Educational Rights and Privacy Act of 1974 (also referred to as the Buckley Amendment or FERPA), 20 United States Code § 1232g, as amended

University Registrar Services Office of General Counsel

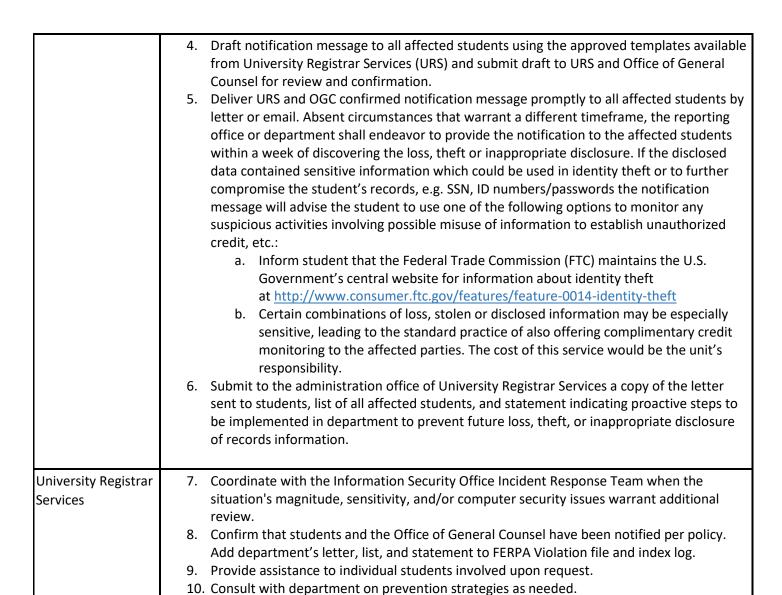
Information Security Office

Policy

Offices, departments, staff, or faculty that experience the loss, theft, or inappropriate disclosure of student education records information are responsible for notifying the police, the individual students, University Registrar Services, the Office of General Counsel and the Information Security Office in a timely manner. Affected departments are also required to develop procedures to avoid future loss, theft, or inappropriate disclosure.

Procedure

Responsibility	Action	
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Office or department reporting loss, theft, or inappropriate disclosure	1. 2.	File police report with appropriate jurisdiction, immediately upon detection, if theft has occurred. Report to the Information Security Office (ISO) per the "Incident Response Standard" policy at https://tech.asu.edu/security-policies/policy/incident-response-standard , when the records theft, loss, or inappropriate disclosure potentially pose a significant risk or could cause significant impact to University systems, assets or personnel. a. ISO will determine if the situation's magnitude, sensitivity and/or computer security warrants additional review by the Incident Response Team. b. ISO must be notified if SSN and/or userids/passwords are part of the data that was lost, stolen or inappropriately disclosed. c. ISO may be required to report certain data breaches or exposures to the Arizona Board of Regents. Notify the administration office of University Registrar Services and the Office of General
]	Counsel of any loss, theft, or inappropriate disclosure as soon as possible.



Cross-Reference

For related information, see <u>SSM 203–08</u>, "Affidavit of Dependency for Release of Records."