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# **Student Data Transfer Protocol**

# When to use the Student Data Transfer Protocol

This document is to be consulted when employees need to send or receive digital student information to another party, internal or external. Refer to Roles and Contacts if questions arise.

Information that includes student or employee data that is sensitive (people may feel upset if the data was revealed) or contains FERPA information should not be sent by email. Exceptions include situations where the student's identity has been verified (contact Registrar for proper protocols), subpoenas, and situations where the student has a release on file. FERPA information includes Student ID, Social Security Number (SSN), transcripts, financial aid records, etc. Contact the Registrar for additional information.

When needed, directory information can be sent via email and includes: full name, enrollment status, enrollment dates, verification of certificate/degree/honor/award, residency status, major/program, and athletic participation (including height and weight of team members), unless a student has requested this information remain restricted. Contact the Registrar for additional information.

Examples that outline common business cases are included in the Appendix.

# **Options for Transferring FERPA and Sensitive Data**

# Internal Transfer:

Note. Do not send FERPA or sensitive data via email.

- Employees who utilize TeamDynamix and are transferring data from a ticket-related request can attach data files to the ticket. Email the recipient and ask them click on the ticket URL to access the data file within TeamDynamix. Do not send the attachment through email.
- Use Teams. Utilize the chat feature or create a Team for ongoing file sharing. Access Microsoft's training to learn how to share files or how to use Teams.
- Some recurring business processes may be best managed in Docuware. <u>Contact ITS</u>.

# External Transfer:

**Note.** Do not send FERPA or sensitive data via email. Do not use third-party applications (e.g., Dropbox or GoogleDrive) to transfer or store data externally. Ensure any party receiving CCC data has a legitimate

need (e.g., is a vendor, is a research partner, etc.) and has a contract in place if needed. Contact the Registrar with questions.

- Utilize SFTP. <u>Contact ITS</u>.
- Some recurring business processes may be best managed in Docuware. <u>Contact ITS</u>.
- If an external party has another method they wish to use to transfer data, verify the security of this method with CCC's ITS department **prior** to transferring files. If another method is approved, document this approval in your department's files.

# How to Manage Teams Groups for Data Transfer

- For ad hoc data transfers, no group management is needed. Simply create a chat with the person or persons who need to receive the file(s) and send.
- For established groups those who transfer data on a regular basis designate one person who is the group manager. This person is responsible for completing or delegating the following tasks:
  - Audit the group membership on a regular basis (at least annually) by adding and removing members from the group as needed to support business processes.
  - Keep the files organized using a method that works for the group. This may include keeping all files in Teams (OneDrive), or moving them to a local drive (e.g., I Drive).

# **Technical Notes**

# TeamDynamix

- TeamDynamix is encrypted end-to-end.
- A single file upload can be up to 20MB, multiple file uploads (at once) can add to 200MB, and there is no storage limit for the whole system.
- Training is currently available. <u>Contact ITS</u>.

# Microsoft Teams

- Teams utilizes OneDrive for Business file storage which is encrypted end-to-end.
- Employees will need a OneDrive account to transfer data files using Teams. If an account has not yet been set up, <u>submit a ticket to ITS</u>. If you receive an error when trying to add files to Teams but you do have a OneDrive account, you simply need to login with your CCC credentials to activate your account at this location: <u>https://onedrive.live.com/about/en-us/signin/</u>
- Teams allows users to share files securely with external (non-CCC) users. Refer to the <u>How To</u> <u>article</u> for step-by-step instructions.
- Join <u>TEAMS Help and FAQ</u> on Teams to ask questions of our Online Learning staff and to find a printable Getting Started handout. You can also <u>watch Microsoft's Teams training videos</u> (closed captions included).
- Learn how to manage permissions within Teams.

# **Roles and Contacts**

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Access, Retention, and Completion Committee	<ul> <li>Owner of the Student Data Transfer Protocol</li> <li>Maintains the Student Data Transfer Protocol documentation, with input from contacts on this page.</li> <li>Communicates changes to the college community.</li> </ul>
<b>Registrar</b> Chris Sweet (Student Data Business Owner)	<ul> <li>Responds to inquiries by employees related to student data to help determine if the Data Transfer Protocol should be followed.</li> <li>Maintains the "When to use the Data Transfer Protocol" section.</li> </ul>
Human Resources Aldene Okihara (Employee Data Business Owner)	<ul> <li>Responds to inquiries by employees related to employee data to help determine if the Data Transfer Protocol should be followed.</li> </ul>
Business Office Elizabeth Cole (Financial Data Business Owner)	<ul> <li>Responds to inquiries by employees and external public records requests related to vendor data to help determine if the Data Transfer Protocol should be followed.</li> </ul>
Applied Information Technology (AIT) Stephen Brouwers	<ul> <li>Assists employees who need to transition student-data processes to follow the Data Transfer Protocol.</li> </ul>
Information Technology Services (ITS) Primary contact: ITS Service Desk Additional support: Systems Team & Information Security Team	<ul> <li>Maintains the Data Transfer Protocol documentation.</li> <li>Serves as a consultant to users needing assistance in sharing files externally using Teams after users have read the provided user documentation.</li> <li>Assists users by setting up OneDrive access.</li> <li>Leads the response to any data breaches, whether the Data Transfer Protocol has been followed or not.</li> <li>Leads projects that need to utilize SFTP.</li> <li>Leads projects that need to utilize Docuware.</li> </ul>
Online Learning and Technology (OLET) Daisy Calvert	<ul> <li>Maintains the Teams Help and FAQ within Teams.</li> <li>Responds to inquiries related to Teams features within Team and via email.</li> </ul>

# **Appendix: Use Case Scenarios**

# Case 1: Emailing a student about their grades

#### Scenario

A student emails you from their student email account and asks about their grade in your class.

# Response

Unless there is something in the email that makes you suspicious, it is acceptable to assume the student is who they say they are as they will have logged into the CCC student email account with a password. Respond to the student via email.

# Case 2: Providing student-level data to a colleague, Example 1

#### Scenario

Your department chair is concerned about students in your program who have not re-enrolled in classes for the following term and they want you and a colleague to reach out to those students. You've pulled the list of students onto your CCC computer and this list contains Student IDs, names, email addresses, and phone numbers.

# Response

As your file contains Student IDs, you're working with FERPA data. Do not send the file by email. You can either place the file in a shared drive and let your colleague know where they can find it, or you can drop the file into Teams. The Teams chat feature is the easiest.

# Case 3: Providing student-level data to a colleague, Example 2

#### Scenario

You are looking at the enrollments in two course sections and notice that some data needs to be cleaned up for three students. You can't clean it up yourself.

# Response

You submit a Service Desk ticket to the AIT Team and provide the Student IDs and a description of what needs to be corrected. The Service Desk is part of TeamDynamix which is fully encrypted.

Case 4: Exchanging student-level data with an external group, Example 1

# Scenario

You partner with an organization that provides training for our students and needs to send us lists of those students and their enrollment to create student accounts and to collect FTE.

# Response

As your files contain FERPA data, do not send this information via email or use another application like Dropbox. Use Teams to send these files securely. Contact AIT if you need assistance transitioning this process.

# Case 5: Exchanging student-level data with an external group, Example 2

# Scenario

You are conducting a research project with another institution and are sharing lists of students who are participating at both sites. You have gone through the IRB at the other institution, but those documents don't stipulate how the participant (student) data is to be transmitted.

# Response

As your files contain data related to a research study, do not send this information via email or use another application like Dropbox. Follow the instructions in the How To article that outlines how to securely send files to external groups via Teams.

# Case 6: Uploading student-level data for mandatory reporting

#### Scenario

You upload student-level data on a quarterly basis to a federal database for mandatory reporting.

# Response

Continue providing the data as it is mandatory. If you are concerned about the security of the data submission portal, submit a Service Desk ticket to ITS and they will review the security protocols.