

The Instructor’s Guide to Information Security

Use this study guide to find out more about sensitive student data, how to handle this information securely, and what steps you can take to protect your office and computer environment against potential security breaches.

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Learning Objectives

By the end of this section, you will know:

- What qualifies as public versus confidential student information at UMass Amherst
- What constitutes a FERPA violation
- What you can do to avoid breaking the law

Section One: Student Information at UMass Amherst

Use this section to learn more about FERPA (the Family Educational Rights and Privacy Act) and its relevance in instructional contexts.

What is FERPA anyway?

FERPA (the Family Educational Rights and Privacy Act) is a federal law that protects the confidentiality of student records.

At UMass Amherst, most student information is *confidential*, and cannot be made public without the student's consent. The FERPA confidentiality requirements apply to all current and former students, starting once a student matriculates.

Note: These confidentiality requirements are based on the University's official interpretation of the FERPA law and other relevant state laws. FERPA may be interpreted and applied differently at other institutions.

FERPA Violations

FERPA violations can have serious repercussions for you, your students, and the University. In addition to legal consequences, (accidentally) releasing FERPA-protected information may also compromise students' safety. Making your class roster public, for example, confirms students' schedule and can help locate them on campus. This is a serious issue, especially for those students who restrict access to their information for personal safety reasons (e.g., stalking, harassment, etc.).

Assume all student information is confidential

Although portions of a student's record are public (see directory information below), we recommend that you work with students' information as if their entire record were confidential. This means declining to give out any student information to anyone (including parents) and referring any information requests to the Registrar's Office.

Directory Information

Typically public, unless the student has a "privacy flag".

Personal & Contact Details

- Name
- Date & place of birth
- Weight & height
(members of athletic teams only)
- Local address
- Home address
- Telephone numbers
- Email Address

Academic Details

- Dates of attendance at UMass
- Major
- Participation in officially-recognized University activities and sports
- Degrees, certificates and awards
- Student employment status
- Most recent previous educational institution or agency attended

**FERPA Violations**

- Leaving attendance sheets that identify your class and your students in a public area.
- Confirming a student's enrollment in your class to anyone, including the student's parents, spouse, or employer.

Directory Information**Students' directory information is typically public**

At UMass Amherst, directory information is available via the print and online directories.

Students can request that their directory information be kept private

Privacy requests are filed with the Dean of Students Office (undergraduate students) or the Graduate School (graduate students). Students can choose between withholding a portion of their directory information (e.g., address only) and restricting access to their entire directory record.

To find out whether a student has a privacy request on file with the University and whether this is a full or partial 'privacy flag', check with the support staff in your department. Student privacy information is available to these staff members in SPIRE.

Directory Information in the Classroom**Privacy flags apply to the outside world, but not within the classroom**

Students can expect that their directory information be protected from the outside world, but not from other students in the same class. This means that it is acceptable for instructors to use:

- Attendance sheets with students' names
- Email lists with students' email addresses

Students' enrollment in your class is always confidential

Students' names may be public, but their class schedule is not. You cannot publicly link students' names with your class without their consent since this confirms part of their class schedule and may help locate them on campus.

Honor your students' privacy requests

Although FERPA does not protect the directory information of the students taking the same class (even for those students who request a full privacy flag), it is always a good idea to keep this information confidential when your students specifically request it.

What is Moodle?

Moodle is the learning management system (LMS) for on-campus courses at UMass Amherst. It offers tools for the development, delivery, and administration of course materials and online interaction.

Because students have to log in with their NetID (OIT Account user name) and can only participate in LMS courses for which they are registered, the LMS can be considered an extension of the classroom for FERPA purposes.

This means that activities that are acceptable in the classroom (e.g., circulating an attendance sheet) are also acceptable in an LMS (e.g., participant lists).

Privacy-Friendly Communication Tools

Moodle News Forum, Quickmail & Collaborative Tools

Moodle provides a secure environment for online communications.

- Instructors can use the *News Forum* to email announcements to all class participants, or use *Quickmail* to send email to individuals, group members, class-section members, or the entire class without disclosing recipients to each other.
- Instructors can allow students to use *Quickmail* to send emails to other course members without requiring them to reveal their contact information. (Moodle provides the option to display your name in the 'From' field, but show the 'Reply to' field as *NoReply@moodle.umass.edu.*)
- *Forum*, *Wiki*, and *Chat* activities also provide secure environments for student online discussion and collaboration.
- Instructors can set up guest access to their Moodle courses, but guests cannot see student names or contact information, cannot view content authored by students, and cannot interact with students.

For more see An Overview of Communication Tools in Moodle:

<http://www.oit.umass.edu/support/moodle/overview-communication-tools-moodle>

To get started in Moodle see:

<http://www.oit.umass.edu/support/moodle/a-guide-building-a-new-course-moodle> or contact the Instructional Media Lab at (413) 545-2823 or instruct@oit.umass.edu.

SPIRE Class Email Lists

Use SPIRE to create an email list that reaches all students enrolled in your class. Class email lists have an automatically-generated list name that identifies the class, but not individual list members.

Note: Class email lists cannot be created for separate groups within the same class, meaning that the entire class receives messages intended for a specific group.

Learn more about Class Email Lists from:

<http://www.oit.umass.edu/support/spire/instructors-manage-your-class-email-lists>

Electronic Mail Lists

Use Mailman, OIT's list management software, to create email lists for specific groups of students or the entire class. Like SPIRE class email lists, Mailman lists do not identify members by name or email address.

Learn more about Mailman Lists from:

<http://www.oit.umass.edu/support/email/request-manage-electronic-mailing-list>

The 'Bcc:' Field

Add your students' email addresses in the 'Bcc:' field of a message, and use the 'To:' field for your own email address. This ensures that your students will only see one recipient (you) for your emails.



FERPA Violations

- Posting a class photo on your public blog or course Web site.
- Forgetting printouts of UCard photos in your classroom or any public area.
- Using a portion of students' UMass IDs on the exam score list posted on your office door.

Photos & ID Numbers

Students' photos and 8-digit UMass IDs are always confidential. No exceptions.

Do not use UMass IDs (or a portion of these IDs) to identify students on public grade lists and exam score sheets

Grades and exam scores can be posted in public only if they are not ordered alphabetically and they do not contain any personal information. If you usually post exam scores on your office door or upload grades to your public course Web site, consider assigning a random number to each student at the beginning of the semester.

Do not post class photos in public online spaces

In public online spaces, anyone with an Internet connection could identify your students. You may upload class photos only to online services that allow you to restrict access to your materials (e.g., Moodle, a password-protected Web site, etc.).

Use students' UCard photos exclusively for academic purposes

You can access your students' UCard photos in SPIRE once you complete the *Security Quiz* and earn your *Security Certificate*.

Use UCard photos to confirm attendance or to match names and faces, but make sure they remain confidential at all times. This means that you cannot:

- Share these photos with anyone, including your colleagues, Teaching Assistants, or other students enrolled in your classes.
- Post these photos on your blog, public Web site, or even a secure learning management system (e.g., Moodle).

Identity Management in the Classroom: Give Students Control over their Information

Avoid breaking the law by letting your students control the information they share with the class and the outside world:

Encourage your students to edit their Moodle profile

Students can decide whether their profiles will include their email address, a photo, etc.

Alert students about the public nature of certain instructional technologies

Blogs, wikis, public course Web sites, social networking services may reveal personal information about contributors. Students concerned about their privacy can choose user names that do not identify them by their real name and explore any built-in privacy options (if available).

Make group photos optional

If you plan on uploading a class photo to a public online space, allow your students to 'opt in' and do not penalize them if they choose not to participate.

Students' Academic Records

The following are confidential and may not be shared with others without the students' explicit permission.

Class materials (any materials for which students receive a grade)

- Class assignments: exams, research papers, reports, art projects, experiment results
- Supplementary materials: discussion posts, blog entries, assignment drafts

Grades, exam scores, and any related information that indicates a student's progress in a class.

Instructor's evaluation of a student's work: feedback, comments, or suggestions delivered in any format (formal/informal) and via any medium (in person, on paper, or on the Web).

Academic Records

Students' academic records are always confidential

To share academic records information with others, you need the student's consent first.

Academic records are not limited to students' grades

In instructional contexts, academic records also include assignments and the instructor's feedback on students' class work.

Academic Records in the Classroom

Do not post grade lists in public

Under FERPA, you can make grade lists public only if the list is scrambled (i.e., not alphabetical) and it does not identify students by any personal information.

Consider using the Gradebook in Moodle

Because students can access only their own grades, Moodle provides an appropriate venue for distributing grades securely.

Do not leave graded assignments in public areas

A common practice is to leave final assignments in departmental mailrooms or outside office doors for students to pick up at the end of the semester. This compromises confidentiality since it enables students to see their peers' grades and makes grade information publicly available.

We recommend that you leave graded projects in individual envelopes with the support staff in your department. These staff members can check students' UCards before handing out their assignments.

Keep your feedback private

Communicate your feedback to students directly, via email or in person; avoid public online spaces where comments are available to anyone (e.g., blogs, wikis, Flickr, etc.).

Exceptions based on 'legitimate educational interest'

In classes where students and instructors assess individual projects as a group (e.g., speeches, art projects), the instructor's feedback is often public. This is not considered a FERPA violation as long as these critiques are necessary for students' learning (i.e., they serve a 'legitimate educational interest'.)

If you are teaching a class that involves collective feedback, make sure:

- Your syllabus briefly describes these sessions
- Your feedback does not mention a student's grade in public
- The contents of these sessions are not available to the outside world

'Legitimate Educational Interest'

FERPA requires that faculty and staff have a 'legitimate educational interest' in order to access or make students' records public without their prior consent.

The term has a broad legal definition that includes acting in the student's educational interest and an employee's need to fulfill job-related responsibilities.

At UMass Amherst, 'legitimate educational interest' refers to "academic status check or evaluations, research, curriculum evaluation or development, institutional/ statistical evaluation and analysis, student placement, public safety, and admissions evaluations." (Academic Regulations, 2007-2008)



FERPA Violations

- Telling a student's mother that she is failing your class.
- Posting evaluations of your students' projects in a public online space (e.g., wiki, blog, Web site, etc.)
- Leaving graded assignments in your department's mailroom at the end of the semester.

Use Moodle to Deliver Grades & Assignments

Because students can access only their own information, Moodle provides a secure and confidential venue for distributing grades and digital files. Use Moodle's:

- **Gradebook** to distribute grades and exam scores
- **Assignment Tool** to accept and return assignments

Find Moodle tutorials in the OIT Support Center:

<http://www.oit.umass.edu/support/moodle> or contact the Instructional Media Lab at (413) 545-2823 or instruct@oit.umass.edu.

FERPA & Advising

Obtain the Student's Consent First

Parents often contact advisors about students' academic progress. In some cases, the parent already works with the student on 'getting back on track'.

Before you reveal any information to a parent, we recommend that you have a release form with the student's signature on file.

Students can request access to their advising record

Under FERPA, students have the right to review their personal and academic records. The University is required to provide students with copies of their records and consider requests to amend any inaccurate information that these records may contain.

Your advising notes are part of a student's academic record and can be reviewed any time. It is important that you keep them factual (support your recommendations with concrete information) and explicit (are your abbreviations intuitive enough?). Don't forget to date your comments!

Publicizing Students' Class Work: FERPA vs. Copyright

If your conference presentation or research paper uses work that students developed in your classes, and you are crediting these students by name, FERPA requires that you obtain the students' consent before publicizing their work.

This principle applies to any medium in which student work is showcased (e.g., at conferences, in journal articles, on departmental Web sites, in brochures and other print materials, etc.). In this context, 'student work' refers to any material developed as part of a class for which students were evaluated (e.g., reports, drawings, discussion posts, etc.).

The FERPA & Copyright Catch-22

- It is a FERPA violation to publicly link students' names with class work, for which they were graded, without their consent.
- It is a copyright violation to use students' class work without crediting them by name.

FERPA questions?

Contact:

The Registrar's Office (545-0555)

- or -

The Dean of Students Office (545-2684)

Section Two: Storing Student Information

Learning Objectives

By the end of this section, you will know how to:

- Choose a safe storage location for confidential information
- Protect your computer against security breaches
- Restrict access to sensitive data

Use this section to learn how to store (student) information securely. Find out more about our preferred storage options and what you can do to maintain a secure information environment.

Do I really need to save this information?

This should be your first question *before* storing any FERPA-protected information in your office or on your computer.

Do not save any student information unless absolutely necessary. If you need to save student information (e.g., transcripts, assignments, grade lists), follow the guidelines below for saving digital and paper files.

Guidelines for Saving Digital Files

Not all storage options are created equal

Use caution when saving confidential documents on laptops, portable storage devices (e.g., CDs, USB drives), or shared computers. If you choose one of these storage options, consider using passwords or encryption as an extra security layer.

Protect your software and hardware

Make sure that you routinely use anti-virus software and that your operating system is updated with the latest security patches and updates. Do you always keep your hardware in a secure physical location?

Use UDrive to store confidential files

Use UDrive to store your students' assignments, projects, and grades, or your own personal records. Access your UDrive files from on or off-campus, from any computer with an Internet connection.

Guidelines for Saving Paper Documents

Choose a safe location (e.g., a locked drawer)

Do not forget copies of confidential documents on your desk or in your classroom.

Shred any copies you no longer need

Recycling without shredding is not a good idea in this case.

What is UDrive?

UDrive, OIT's Web-based file storage and sharing system, provides a secure storage alternative for sensitive information.

We recommend storing FERPA-protected documents on UDrive because:

- **They're safe.** UDrive uses the appropriate security protocols to protect your files.
- **They can't get lost.** UDrive gives you the flexibility of a portable storage device without the 'easy-to-lose' factor. No need to worry about losing or misplacing a disk or drive.

Learn more about UDrive from <http://www.oit.umass.edu/udrive/>

Secure Your Computer

Security breaches occur most often on computers that are not up-to-date and that do not use the most recent anti-virus software. The most important steps you can take to secure your computer are to use anti-virus software and to keep your operating system updated.

See our Security Checklist for Personal Computers:
<http://www.oit.umass.edu/support/security/security-checklist-personal-computers>

Protect your Mac!

Macs play a critical role in a secure information environment. Did you know? Even if not infected, Macs can help transmit viruses to Windows computers.

Don't take your Mac for granted!

- **Use your anti-virus software.** Run a full scan of your computer at least once a semester. Configure your anti-virus application for automatic scans and updates.
<http://www.oit.umass.edu/virus/software/virex7.html>
- **Stay informed.** Check the OIT Web site and the Apple Web site for the latest security news and advisories.

Install Protective Software

Viruses and other malicious software can infiltrate your machine and perform unwanted tasks, compromising your documents and computer programs.

Install the appropriate version of anti-virus software for your computer

Anti-virus software is available to members of the University community at no charge from the OIT Web site.

<http://www.oit.umass.edu/security/use-anti-virus-software>

Update your virus definitions

Keeping your virus definitions updated ensures that your anti-virus software recognizes new forms of malicious software and detects new virus strains.

Enable automatic scans and on-access scanning

Automatic scans help you to routinely monitor your computer for any suspicious activity. On-access scanning provides continuous scanning and virus detection when new files are opened or saved to your computer.

Note: In addition to automatic and on-access scans, we recommend that you run a full scan of your computer at least once a semester.

Keep Your Software & Operating System Updated

Security breaches occur most often on systems that are not up-to-date. It is critical that you:

Install security patches

Software vendors routinely release patches and fixes that cover known vulnerabilities and security holes. Protect your computer by keeping it updated with the latest patches, updates, and drivers.

Enable automatic updates

By enabling automatic updates, your computer will receive critical patches every time you connect to the Internet.

Learn more about security patches and updates:

Macintosh: <http://www.oit.umass.edu/support/security/keep-your-computers-operating-system-up-date-windows>

Windows: <http://www.oit.umass.edu/support/security/keep-your-computers-operating-system-up-date-macintosh>

Protect Your Computer against Malware

Watch out for malware (a.k.a. spyware and adware). Malware is a generic term for various types of malicious software, known for corrupting Windows operating systems, causing conflicts with legitimate software, and leaving your computer vulnerable to worms and other viruses. Malware are also known for hijacking personal information and relaying it to advertisers and other third parties.

Use spyware detection programs

Choose between McAfee VirusScan (which comes with a built-in spyware detection and removal feature) or other reputable software (e.g., Malwarebytes, or SpyBot Search & Destroy).

Note: At this time, OIT offers direct support only for McAfee VirusScan.

Download software from reputable sources

Be particularly suspicious of 'personalized offers', 'scare tactics', and software that claim to speed up your Internet connection.

Restrict pop-up ads

Some malware infiltrate your computer via random pop-up windows. By enabling your browser's pop-up blocker, you win twice: you avoid aggressive online advertising and protect your computer against malicious software!

Learn more about malware from:

<http://www.oit.umass.edu/security/malware-viruses-spyware-adware-other-malicious-software>

Protect Your Hardware

These are basic safety rules, but how many times have you wondered whether you locked your office door?

- **Lock away your CDs, USB Drives** and any other storage media
- **Use a laptop security cable** to lock your laptop to your desk. Most computer retailers have them available at accessible prices.
- **Lock your office door at the end of the day!**

Use UMASS-SECURE1X for wireless access on campus

UMASS-SECURE1X is fast, convenient, and secure. Use our setup wizard to configure your computer, then connect automatically from any wireless coverage area on campus.

For help setting up UMASS-SECURE1X see:

<http://www.oit.umass.edu/wireless>



FERPA Violation

Sharing your OIT NetID and password.

By sharing your OIT NetID and password, which you use to log on to SPIRE, you put your students' information at risk. You will lose your SPIRE access if the Registrar's Office detects any FERPA violations associated with your SPIRE profile.

If you absolutely must write down your password....

- **Write down password hints**, not the actual passwords.
- **Keep your ID and password information separate**: do not save user names and passwords in the same place.
- **Consider password storage software** that keeps all your passwords in one central location

(Mac OS X)

Enable the key chain feature (be careful, if you forget your master password, all your passwords will be unrecoverable).

(Windows)

Consider a commercial product similar to the key chain component for Macs.

Learn how to set up User Accounts for Windows and Macintosh:

<http://www.oit.umass.edu/support/security/protect-against-viruses-security-threats>

Restrict Access to Your Data

Use Strong Passwords

Passwords are the weakest link in maintaining your computer's security. It is critical that you:

Choose strong passwords

Password-guessing software often use 'dictionary attacks' (i.e., trying every combination of characters) to break passwords. Your passwords should always include letters, numbers, and characters. Never use full words or personal information.

Change your passwords on a regular basis

To guard against 'dictionary attacks', remember to change your passwords at least twice a year (once every semester).

Always say 'No' when prompted to save a password

Some browsers offer to save your passwords. Get in the habit of always saying 'No'.

Do not recycle passwords

No matter how tempting, do not use the same password for different accounts. It's bad if your email is hacked. It's even worse if your email *and* bank account are broken into.

Do not write down passwords

Storing your passwords on a post-it note on your monitor is an open invitation to access your computer. We believe that no location is safe enough for storing passwords.

Do not share your passwords

By making passwords available to others (even people you trust), you put your personal information at risk and make it vulnerable to misuse.

Password-protect Your Files

Use passwords to 'lock' individual documents

Passwords allow you to add an extra layer of security to files that contain sensitive information. Consider assigning passwords to all documents containing student information that you store on disks, thumb drives, and other portable storage devices.

Set up User Accounts

Users who log in as 'Administrators' for every computer session put their computers at risk because viruses and trojans are most harmful if they enter via an Administrator Account. We recommend that you create a User Account for everyday use and save Administrator access for "administrator-level" tasks such as software installation.

User Accounts should always be used on shared computers. This ensures that any student information you may have saved on your machine remains confidential and is not accessible to others.

Learn how to enable screen saver passwords from:
<http://www.oit.umass.edu/support/security/password-protect-your-computer-files>

Use Password-protected Screen Savers

Once you have enabled a User Account, you can restrict access to your computer when you step away from your desk. Password-protected screen savers allow you to temporarily 'lock' your computer without shutting it down. The screen saver will prompt you for your User Account password when you are ready to resume your work.

"Sanitize" Old Computers and Media

Before you sell, recycle, or get rid of your computer, sanitize it first, i.e., be sure your hard drive is completely erased ('wiped') and its contents are permanently removed.

Tossing your files in the 'Recycle Bin' is not enough. Placing files into the computer's trash and then emptying the trash deletes only the visible portion of these files. Their contents are still retrievable using readily available data recovery software.

Stay current with the UMass Data and Computing Policies. Data purging is required when disposing of any University-owned electronic media. Disposal refers to recycling, salvaging or transferring ownership of computer and other technical equipment.

Learn more from: <http://www.massachusetts.edu/policy/>

'Data Purging' Options

To purge your computer, use one of the options described below.

Note: Data purging irretrievably erases the contents of your hard drive. You will not be able to recover any information once your computer is 'purged'.

- **OIT Software Support**
Our consultants will use data-shredding software to decommission your computer. Stop by A118 LGRC LR during regular business hours.
(M-F, 8:30 a.m. – 5:00 p.m.)
- **Digital shredding software**
Digital shredding packages are available from various online vendors, for example *Active@KillDisk*:
<http://www.killdisk.com>
(Not currently supported by OIT)
- **Use the Disk Utility built into the Mac OS X operating system**
Macintosh computers come with a program that can be used to completely erase disks. Look for **Disk Utility** under *Applications > Utilities*.

Section Three: Sharing Student Information

Learning Objective

By the end of this section, you will know the dos and don'ts of sharing student information securely.

Use this section to learn more about sharing (student) information securely. Find out more about our preferred communication tools and what you can do to avoid a security breach.

Email & Instant Messaging (IM)

Use UDrive

UDrive's sharing capabilities make it a convenient alternative to sending email attachments. Keeping the data file on your UDrive space and controlling access to it is better than sending out attachments that may get forwarded or stored in insecure locations.

Use UDrive for:

- Collecting grades from your Teaching Assistants
- Providing feedback to your students
- Receiving and returning assignments

Use Encrypted Email (such as UMail)

Not all email services are created equal

The security protocols used to protect your information often vary by email provider. UMail, OIT's email service, uses encryption to scramble messages, making them useless if intercepted en route. Commercial email services that do not provide encryption are much less secure and should not be used to discuss or transfer confidential student information.

Use UMail or your departmental email address for communicating student information

These campus email services use the appropriate level of encryption to keep your messages secure.

Avoid sending highly sensitive information via email

Because even encrypted email can be forwarded, printed or otherwise end up in an insecure location, we do not recommend sending the following information via email:

- Account names and passwords
- Sensitive personal information such as Social Security Numbers
- Files containing grades or personal data about an entire class

Do not Use Public Instant Messaging (IM)

Public instant messaging is not a secure option for communicating any sensitive information; this includes your students' grades, IDs and passwords, as well as your Social Security and bank account number.



FERPA Violation

Emailing your entire grade roster to the OIT Help Desk. When looking for grading help, use samples from your grade rosters to illustrate your problem. Do not send us the entire roster!