



US FEDERAL LOANS – INFORMATION SECURITY POLICY

Academic Registrar

 SMT

Next Review

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Introduction

Title IV is Federal Student Financial Aid for US citizens or eligible non-citizens. It is funds the US government allows students to apply for to assist with college tuition and expenses.

Norwich University of the Arts (NUA) is a participating institution in the Federal Direct Loan Programme (Title IV loans). The US Department of Education has regulatory oversight of these loans, but the funds are directly administered by NUA for students wishing to study here.

Responsibility

The International Department have a duty of care in terms of managing personal data for those applying for Title IV (T4) Direct Loans.

These are detailed by the US Department of Education (USDE) Federal Student Aid (FSA)

- Dear Colleague Letters [GEN-15-18](#) and [GEN-16-12](#)
- Further detail is given in the [FSA US Loans Handbook](#) which is updated each year.
- [Amendment to Audit Guide: Student Information Security](#)

As participants of Title IV loans US system NUA have access to sensitive personal information about borrowers. We have a duty of care for that information and how NUA record and store it for the purposes of administering loans.

The rules and regulations for Title IV Federal Student Financial Aid are set by the US Government and data retention requirements as detailed in the Code of Federal Regulations. The University does not have any discretion to alter these Regulations. As with all student information NUA are bound by UK Data Protection legislation in how NUA manage and retain information about students. This is similar to that of US law and the Gramm-Leach-Bliley Act.

Security

Using US systems

All US Loans systems require two factor authentication (TFA) – password and additional numeric key. Two-factor authentication is a security process in which the user provides two means of identification from separate categories of credentials. One is typically something you know, such as a password, and the other is something you have, such as a security code from a portable token key or download from a mobile device.

US Loans regulations

The University is subject to legislation under US law in relation to T4 loans. The [Federal Student Aid Handbook](#) Volume 2 – *School Eligibility and Operation*, Chapter 7, *Record Keeping, Privacy & Electronic Processes*, has details about good practice in being compliant with record keeping.

The Gramm-Leach Bliley (GLB) Act: Under our Program Participation Agreement (PPA) and GLB (Public Law 106-102), NUA must protect student financial aid information, with particular attention to information provided to us by the US Department of Education (USDE) or otherwise obtained in support of the administration of the federal student financial aid (FSA) programs.

Family Educational Rights and Privacy Act (FERPA) deals with requirements relating to the privacy and security of Personally Identifiable Information (PII) in student records. The combination of FERPA and GLB is very similar to that of our own data protection legislation Data Protection Act (2018) and General Data Protection Act (GDPR) (2018).

Access controls

The [Student Aid Internet Gateway](#) (SAIG) is the method by which NUA access online portals for processing T4 loans. Our [SAIG Agreement](#) includes a provision about how NUA must protect data and systems that NUA use.

NUA US loans borrowers records are held in. These could be in the form of:

- Paper files
- Emails
- Electronic records
- Restricted shared folders

All of our paper records are held in secure storage – locked cupboard – with only 2 key-holders within the International Department who have authority to administer Title IV Loans.

Electronic records are only accessible by designated staff within the International Department, Primary Destination Point Administrator and Destination Point Administrator.

Care should be taken when sending emails and personally identifiable data should not be openly emailed without password protection / encryption.

Training

All NUA staff must undergo online training for:

- Information Security
- Data Protection
- Unconscious bias
- Equality and Diversity

In addition to this, staff using Title IV loans software are required to undertake relevant online security training. This must be renewed regularly and you will be prompted to do this when logging into US systems.

Data security Incidents

The USDE encourage Universities to inform their students about any breaches of security in relation to Title IV loan records and information. The USDE may consider any breach to the security of T4 student records and information as a demonstration of a potential lack of administrative capability, for which NUA can be fined or lose our institutional licence.

NUA also have a duty to notify FSA about any T4 loans data breaches to:

- FSASchoolCyberSafety@ed.gov and copy in
- CPSSAIG@ed.gov

In the first instance all T4 data breaches should be reported immediately to the International Manager (Primary Destination Point Administrator for T4 loans).

They will then liaise with necessary parties, including the Compliance Manager and IT Services Manager. The Information Security Incident reporting procedure will be followed. This is located within our Information Security Policy.

Related NUA Policies

- Data Protection Policy
- IT Acceptable Use Policy
- Information Security Policy (Including Information Security Incident reporting procedure)

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