THE UNIVERSITY OF TEXAS AT DALLAS
Quarterly Compliance Report to the Institutional Compliance Committee

Report for the Quarter Ending: November 30, 2006

High Risk Area: Student Confidentiality Non-Directory Information

Responsible Person: Sue Sherbet

Incidents of Non-Compliance this Quarter*:*
Yes ☒
No ☐

If yes, briefly describe any known incidents of non-compliance and attach back-up documentation as appropriate.

August 15, 2006 – Student complained to Registrar's Office that her summer grades were sent to her uncle. Registrar staff researched the student's parent certification history and found a parent certification form completed by the student's father and the student but did not find one completed by the student and the uncle. The student did list the uncle as an emergency contact on her admission application. This entry caused confusion while processing the parent certifications since the uncle's name was the name listed in the parent certification database. The situation was complicated in that the father and the uncle had the same residence. It was determined that a former employee was the one who made the error. The Office of the Registrar has reviewed the parent certification process and has made the necessary changes to assure such an occurrence does not happen again. Registrar staff members were also required to go through re-training on FERPA and the parent certification process.

August 22, 2006 – An attorney requested the transcript of an international student who had been detained. A Registrar employee believed that because the request was from the student's attorney that it was okay to honor it. The employee was told that since there was not a signed release from the student to make the transcript available to the attorney, this was a violation of FERPA. The attorney was contacted immediately and asked either to return the official transcripts to send a release signed by the student via FAX. The attorney secured the signed release from the student and returned it to the Registrar's Office. The Registrar employee in violation of FERPA received a written reprimand for the incident and the Registrar staff participated in additional FERPA training.

Status of Previous Incidents of Non-Compliance: *(If you reported "Incidents of Non-Compliance" in your previous report(s), briefly describe their status)*

Areas of concern: *Briefly describe any concerns you wish to discuss related to your area of responsibility. This would **not** include an incident of non-compliance discussed above.*

July, 2006 – A Global MBA student sent a letter to the Provost complaining about several issues he had with UTD. Among the complaints he issued was that a certified letter requesting return of financial aid loan proceeds was mailed to a relative's address in California when it should have been mailed directly to the student in The Netherlands. He is complaining that this is a violation of his FERPA rights. This complaint did not make its way to me until September, 2006, after Richard Huckaba had investigated the matter. The letter in question was, in fact, mailed to a California address, but it was addressed to the student by name. The fact that the relative received and opened the letter on behalf of the student cannot be controlled by UTD. Since the California address was the one recorded in the information system, this is not likely a violation of the student's rights under FERPA.

Training Conducted: *(Indicate date, topic, trainer, audience, number trained)*

A number of FERPA training sessions were conducted for faculty, students, and staff. The training sessions were delivered by the Registrar.

Training Received: *(Indicate date, topic, conference or meeting attended and who was trained. This section is for indicating the training received by persons responsible for high-risk areas, including their staff.)*

Registrar's staff received refresher training on FERPA.

Monitoring Method: *Briefly describe the method of monitoring that took place during this quarter to insure compliance and what follow-up action was taken if non-compliance was found.*

The Registrar continued to monitor for compliance through periodic walk-arounds and observations in various offices on campus.

The first meeting of the FERPA Compliance Subcommittee was held on November 2, 2006. Committee members reviewed FERPA regulations, forms and processes and discussed ways we can provide for more education and more comprehensive monitoring of FERPA compliance across campus.

Have you identified any new high-risk areas?
Yes ☐
No ☒

If yes, briefly describe.

This form was prepared by Sue Sherbet
on November 1, 2006.
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Quarterly Compliance Report to the Institutional Compliance Committee

Report for: **FY 2007, 2nd Quarter**

High Risk Area: Student Confidentiality Non-Directory Information

Responsible Person: Sue Sherbet

Incidents of Non-Compliance this Quarter:
Yes ☒
No ☐

If yes, briefly describe any known incidents of non-compliance and attach back-up documentation as appropriate. An incident of non-compliance is defined as something that you found as part of your monitoring procedures. Areas of concern are listed below.
February 2, 2007 - Director of Information Security reported grade rosters containing last four digits of SSN and/or partial UTD-ID numbers posted by 4 different faculty members (Drs. Taesun Kim, Charles Bernardin, Marco Tacca, John Burr) on public websites.

What did you do as a result of the incident(s) of non-compliance? *Briefly describe the action taken on the above incidents of non-compliance.*
February 2, 2007 - Information Security Office blocked public access to the websites and notified the FERPA Compliance Officer. Ms. Sherbet contacted each of the 4 faculty members and found that 3 of the 4 rosters were from prior years. These 3 faculty members indicated they had just failed to get them pulled off the websites and assured Ms. Sherbet that their practices for posting grades are different now. They either use the secured WebCT system or, in the case of one professor, assign and use a random class ID number to each student to post grades. Ms. Sherbet is still working with the fourth professor to resolve the problem.

Status of Previous Incidents of Non-Compliance: *(Review your previous reports. If you reported "Incidents of Non-Compliance" in your previous report(s), briefly describe their status).*
All previous incidents have been resolved and controls have been reviewed and changed, where deemed necessary to avoid such incidents in the future.

Areas of concern: *Briefly describe any concerns you wish to discuss related to your area of responsibility.* This would **not** include an incident of non-compliance discussed above.
How to provide adequate training to the appropriate individuals, monitor the entire campus for compliance and get the campus community to understand the importance.

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Training Conducted: *(Indicate date, topic, trainer, audience, number trained, as per your RAMP)*
The following FERPA Training Sessions were conducted:
January 3, 2007 - Delivered by Registrar Staff to 60 students at New Student Orientation
January 4, 2007 - Delivered by Jimmy Casey to 100 students at International Orientation
January 4, 2007 - Delivered by Registrar Staff to 60 TAs at TA Orientation
January 4, 2007 - Delivered by Dondreae Gray to Katie Defusco
January 8, 2007 - Delivered by Jimmy Casey to 30 students at International Orientation
January 16, 2007 - Delivered by Dondreae Gray to Jennifer Nichols and Andrea Moody
January 31, 2007 - Delivered by Shella Hayes to Cristen McClure
February 9, 2007 - Delivered by Registrar staff to Waterview Staff (17 people)

Training Received: *(Indicate date, topic, conference or meeting attended and who was trained. This section is for indicating the training received by persons responsible for high-risk areas, including their staff.)*
February 5, 2007 Leah Teutsch attended UT Information Security Officers' Council meeting where they discussed implications of FERPA to information security initiatives.

Monitoring Method: *Briefly describe the method of monitoring that took place during this quarter to insure compliance and what follow-up action was taken if non-compliance was found.*
1. FERPA Compliance Subcommittee met on February 8, 2007 to review issues and discuss ways to monitor the entire campus for FERPA compliance more efficiently and effectively.
2. Information Security Office monitoring public websites for sensitive information.
3. Registrar, Karen Jarrell, conducted routine observations and spot checks in her office to ensure that staff members were utilizing motion sensor screen savers and that they did not have sensitive documents in open view of the public or passersby.
4. Updated FERPA notification to employees; added a FERPA form within NetID website. Employees are now required to read and indicate they have read the information before changing their NetID password.
5. Sent email to all faculty and staff about their FERPA responsibilities, how to report incidents of non-compliance and the new requirement for employees to sign the "FERPA University Constituent Access to Student Academic Information" form anytime they are requesting computer access.
6. Annual notification to students through studentbody@utdallas.edu in February and will be done each semester.

Have you identified any new high-risk areas?
Yes ☐
No ☒

If yes, briefly describe.

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Assessment of Risk: *What is YOUR assessment, as responsible person, of the control structure as either:*

Well controlled ☐
Opportunity for enhancement ☒
Significant opportunity for enhancement ☐

RAMP Priority Ranking (note changing definition)
1=High - Needs **immediate** effort, currently dedicating resources ☒
2=Medium – Currently dedicating resources to get under control ☐
3=Low – Under control ☐

This form was prepared by Sue Sherbet on 2/7/07
on 1/26/2007
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Quarterly Compliance Report to the Institutional Compliance Committee

Report for: FY 2007, 3ʳᵈ Quarter

High Risk Area: Student Confidentiality Non-Directory Information (FERPA)

Responsible Person: Sue Sherbet

Incidents of Non-Compliance this Quarter*:*
Yes ☒
No ☐

If yes, briefly describe any known incidents of non-compliance and attach back-up documentation as appropriate. An incident of non-compliance is defined as something that you found as part of your monitoring procedures or an instance of non-compliance with the policies and procedures that are defined in your RAMP. Areas of concern are listed below.
 Feb. 20, 2007 - Received a report from a student about Professor Carare distributing and collecting graded papers to students by leaving them in a stack on an unattended table.

Feb. 22, 2007 - The staff physician in the Student Health Center passed on confidential information to one student about another student.

What did you do as a result of the incident(s) of non-compliance? *Briefly describe the action taken on the above incidents of non-compliance.*
Feb. 20ᵗʰ incident - Professor Carare was notified that he had violated the FERPA rights of his students by leaving graded papers unattended for students to pick up. FERPA regulations were reviewed with him. Professor Carare apologized and said he would make sure it would not happen again.

Feb. 22ʳᵈ incident - Director of the Health Center discussed the incident with the physician and reviewed FERPA regulations with him. The physician also completed the FERPA module in the Training Post. The physician was later terminated.

Status of Previous Incidents of Non-Compliance: *(Review your previous reports. If you reported "Incidents of Non-Compliance" in your previous report(s), briefly describe their status).*
Feb. 2ⁿᵈ incident related to grade rosters being posted on the Web by faculty members. All professors have now been contacted and have been made aware of the violation. The professors have given assurances that their practices for posting grades have changed and they will no longer post rosters with identifying information on the Web.

Areas of concern: *Briefly describe any concerns you wish to discuss related to your area of responsibility.* This would **not** include an incident of non-compliance discussed

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above. This would include a concern that relates to your high-risk area that could be a potential issue in the future, an issue that is not necessarily a compliance issue, etc.

Training Conducted: *(Indicate date, topic, trainer, audience, number trained, as outlined in your RAMP)*

Date	Trainee	Trainer	Topic
2-19-07	43 attendees	Jennifer/Karen/Mitzie	Registration and FERPA
2-21-07	62 attendees	Jennifer/Karen/Mitzie	Registration and FERPA
2-22-07	51 attendees	Jennifer/Karen/Mitzie	Registration and FERPA
3-5-07	Sheri Conley	Shiella	Registration and FERPA
3-5-07	Lynn Hankins	Shiella	Registration and FERPA
3-8-07	Ben Williams	Dondreae'	Registration and FERPA
3-13-07	Ngan Wedemeier	Shiella	Registration, SIS, and FERPA
3-15-07	Eric Lavin	Shiella	Front Desk and FERPA
3-15-07	Farah Veerjee	Shiella	Front Desk and FERPA
3-15-07	Byron Spencer	Shiella	Front Desk and FERPA
3-15-07	Haseeb Jangda	Shiella	Front Desk and FERPA
3-15-07	Steven Tung	Shiella	Front Desk and FERPA
3-15-07	Sheri Conley	Shiella	Front Desk and FERPA
3-15-07	Andrea Younger	Shiella	Front Desk and FERPA
3-16-07	Kay Van Alstine	Shiella	Registration, SIS, and FERPA
3-16-07	Elizabeth McCabe	Shiella	Registration and FERPA
3-22-07	Inga Musselman	Shiella	Registration, SIS, and FERPA
3-23-07	Chien Paden	Shiella	Registration and FERPA
4-12-07	Cathy Von Noy	Shiella	Registration and FERPA
4-12-07	John Caudell	Dondreae'	Registration and FERPA
4-16-07	Laagabka Tchindebbe	Dina & Dondreae'	FERPA
4-17-07	Trudi McKay	Dondreae'	FERPA
4-19-07	Alem Ghebrikirstose	Dina & Shiella	Registration and FERPA
4-19-07	Elizabeth Evans	Andrea & Shiella	Registration and FERPA
4-26-07	Avery Ausborne	Dina & Mareze	FERPA
5-10-07	Blake Hamaker	Andrea & Mareze	FERPA
5-15-07	Tomeka Myles-Odom	Dina	FERPA
5-16-07	John Foxworth	Shiella	FERPA
5-17-07	Franklin Casey	Andrea & Shiella	FERPA
5-18-07	Andrianne Blaskey	Shiella	FERPA

Training Received: *(Indicate date, topic, conference or meeting attended and who was trained. This section is for indicating the training received by persons responsible for high-risk areas, including their staff.)*
None

Monitoring Method: *Briefly describe the method of monitoring that took place during this quarter to insure compliance <u>and</u> what follow-up action was taken if non-compliance was found.*

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Walkthroughs Conducted:
Enrollment SVCS: January 9 & 23; February 1 & 15; March 5 & 19; April 3 & 20; May 3 & 8
Financial Aid: January 9 & 23; February 1 & 15; March 5 & 19; April 3 & 20; May 3 & 8
Bursar: January 9 & 23; February 1 & 15; March 5 & 19; April 3 & 20; May 3,4,9,10
Registrar: January; January 9 & 23; February 1 & 15; March 5 & 19; April 3 & 20; May 3 & 8

Have you identified any new high-risk areas?
Yes ☐
No ☒

If yes, briefly describe.

This form was prepared by Sue Sherbet
on 5/18/2007

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Quarterly Compliance Report to the Institutional Compliance Committee

Report for: **FY 2007, 4th Quarter**

High Risk Area: Student Confidentiality Non-Directory Information (FERPA)

Responsible Person: Sue Sherbet

Incidents of Non-Compliance this Quarter*:*
Yes ☒
No ☐

If yes, briefly describe any known incidents of non-compliance and attach back-up documentation as appropriate. An incident of non-compliance is defined as something that you found as part of your monitoring procedures or an instance of non-compliance with the policies and procedures that are defined in your RAMP. Areas of concern are listed below.

July 11, 2007 - It was reported that a staff member of the International Student Services Office released information to a student's attorney through a forwarded email without the written consent of the student. She realized immediately that she should not have done so. She called the student the next morning to tell him that she needed a signed release authorizing her to share any further information with the student's attorney; the student provided a signed "Third Party Release of Information" form within an hour of that call.

What did you do as a result of the incident(s) of non-compliance? *Briefly describe the action taken on the above incidents of non-compliance.*
The Director spoke with the staff member about the incident, documented the incident in writing and told the staff member if there were other such incidents within the following 6 months, a formal letter of reprimand would be sent to Human Resources. The Director also conducted refresher FERPA training for the entire staff of the International Student Services Office.

Status of Previous Incidents of Non-Compliance: *(Review your previous reports. If you reported "Incidents of Non-Compliance" in your previous report(s), briefly describe their status).*
No previous incidents without closure.

Areas of concern: *Briefly describe any concerns you wish to discuss related to your area of responsibility.* This would **not** include an incident of non-compliance discussed above. This would include a concern that relates to your high-risk area that could be a potential issue in the future, an issue that is not necessarily a compliance issue, etc.
No new areas of concern reported.

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Training Conducted: *(Indicate date, topic, trainer, audience, number trained, as per your RAMP)*
The following FERPA training sessions were conducted during the 4th quarter by staff of the Registrar's Office::

May 2007
Blake Hamaker
Amanda Ingram
Casey Lang
Adrianne Blaskey
Tandice Emswiler
Vicki Jennings
Ryan Fellers
Karla Lopez
Marlonda Malcolm
Auburn Rutledge
Jerry Alexander
Cynthia Walder
Danielle Edwards-Crandall

June 2007
David Clark
Anuja Ghimire
Ajay Grover
Cassandra Gipson
Sonja Miley
Dr. Doug Watson

July 2007
James Avery
Dongjing Zhang
Jeri Heckathorn
Deborah Samac
Lynda Blaylock
Chris Cody
Megan Greene
Anthony Rainey
Rais Bhuiyan
Dewayne Mark Salmon
Sabrina Shi
Deidra Bettley-Madrid
Suzanne Newsom
Sandra Zemcik

July 27, 2007 The Director of the International Student Services Office Staff conducted a FERPA refresher sessions for the entire staff of that office.

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Training Received: *(Indicate date, topic, conference or meeting attended and who was trained. This section is for indicating the training received by persons responsible for high-risk areas, including their staff.)*
None reported

Monitoring Method: *Briefly describe the method of monitoring that took place during this quarter to ensure compliance <u>and</u> what follow-up action was taken if non-compliance was found.*

Registrar walkthroughs were conducted as follows:
Enrollment Services Office: May 3 & 8; June 5, 12, 21; July 3, 12, 25
Financial Aid Office: May 3 & 8; June 5, 12, 21; July 3, 12, 25
Bursar's Office: May 3,4,9,10; June 5, 12, 21; July 3, 12, 26
Registrar's Office: May 3 & 8; June 5, 12, 21; July 3, 12, 26

June 1, 2007 - Notice of "Your rights under FERPA" sent to studentbody@utdallas.edu

Have you identified any new high-risk areas?
Yes ☐
No ☒

If yes, briefly describe.

Assessment of Risk: *What is YOUR assessment, as responsible person, of the control structure as either:*

Well controlled ☐
Opportunity for enhancement ☒
Significant opportunity for enhancement ☐

RAMP Priority Ranking
1=High - Needs **immediate** effort, currently dedicating resources ☐
2=Medium – Currently dedicating resources to get under control ☒
3=Low – Under control ☐

This form was prepared by Sue Sherbet
on 7/27/07

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