

BUSINESS POLICY

TO: All Members of the University Community 2009:07

DATE: March 2009

INFORMATION SECURITY POLICY (Supersedes 2005:03)

I. POLICY

It is the policy of Ferris State University to comply by the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act (HIPAA), the Family Rights and Privacy Act (FERPA), and the Payment Card Industry (PCI) Data Security Standard, and any amendments that may be adopted under the Acts, which generally requires institutions to ensure the security and confidentiality of personal information. Violators of this policy will be subject to discipline by the University, up to and including termination of employment and dismissal from the University.

II. COMPLIANCE

Ferris State University has developed a written information security guideline that describes our plan to protect customer information. The guidelines are appropriate to the institution's size and complexity, the nature and scope of its activities, and the sensitivity of the customer information it handles. As part of the guidelines, Ferris State University will:

- Designate one or more employees to coordinate the guidelines;
- Identify and assess the risks to customer information in each relevant area of the company's operation, and evaluate the effectiveness of the current safeguards for controlling these risks;
- Design and implement a safeguards program, and regularly monitor and test it;
- Select appropriate service providers and contract with them to implement safeguards; and
- Evaluate and adjust the program in light of relevant circumstances, including changes in the firm's business arrangements or operations, or the results of testing and monitoring of safeguards.

III. AUTHORITY

Authority is delegated to the Vice President of Administration and Finance or his/her designee(s) to create and maintain an Information Security Guidelines for Ferris State University.

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