

Valparaiso University Information Security Plan

Institution

This plan ("Plan") is prepared and adopted by The Lutheran University Association, Inc. d/b/a Valparasio University (University).

Purpose

The purpose of this Plan is to comply with the Information security and safeguarding provisions of the Gramm-Leach-Bliley Act (GLB).

Definitions

"Customers". As used in GLB and in this document, Customers are University students.

"Information" shall mean the personal information of Customers which is covered by GLB.

Coordinator

The Coordinator of this Plan is the Executive Director of Electronic Information Services for the University.

Privacy Provisions

The University is in compliance with the Family Educational Rights and Privacy Act (FERPA) of 1974. [University FERPA Provisions](#) are published in the Student Handbook and in the University policies on the University intranet.

Information Safeguards

A. The objectives of University information safeguards are:

1. To ensure the security and confidentiality of Customer Information;
2. To protect against any anticipated threats to the security or integrity of such Information;
3. To guard against unauthorized access to or use of such Information that could result in substantial harm or inconvenience to any Customer.

B. Risks Addressed by Safeguards

The following risks have been identified as potentially arising and existing in the normal course of the University's operations:

1. Physical access by unauthorized people
2. Electronic access by unauthorized people
3. Natural or man-made disasters (fire, flood, storm, etc.)
4. Unintentional compromise by authorized people
5. Negligence on the part of authorized people
6. Malicious acts by authorized people

The University believes that current safeguards protect the Customer Information from these risks. This Plan will serve to strengthen and, in some instances, formalize the policies and procedures.

C. Implementation Practices

1. Employee Training and Management

The purpose of employee training and management is to forestall unintentional or negligent acts on the part of authorized people; to reduce the risk of access by unauthorized people; and to minimize the effects of natural or man-made disasters and malicious acts.

The University's Employee Training and Management policies may be found in [IT SOP 9.1.3 Workforce Security](#) and its subsections.

2. Safeguards for Physical Documents

a. Physical Security

- i. Physical records will be kept in lockable cabinets, which are locked when unattended and/or cabinets will be kept in lockable rooms, which are locked when unattended;
- ii. Critical files will be kept in fire-retardant cabinets;
- iii. Storage areas will be protected against destruction or potential damage from physical hazards, like fire or floods;
- iv. a records retention manager will be designated within each office storing Customer Information to supervise the disposal of records containing non-public personal information;
- v. Customer Information recorded on paper will be shredded and recycled;
- vi. the University will promptly dispose of outdated Customer Information.

b. Access Security

- i. Access to data will be provided on a "need to know" basis.

3. Safeguards for Electronic Information

a. Physical Security:

- i. Physical Facilities shall be secured in accordance with [IT SOP Number 9.2.1.2: Facility Security Plan](#)
- ii. Access to physical facilities will be limited in accordance with [IT SOP Number 9.2.1.3: Facility Access Controls and Validation Procedures](#).
- iii. Data and files are physically backed up in accordance with [IT SOP Number 9.1.7.1: Data Backup Plan](#)
- iv. Devices and media shall be disposed of in accordance with [IT SOP Number 9.2.4.1: Device and Media Disposal](#)

b. Electronic Security:

- i. The University's computing and networking environment shall be electronically secured in accordance with [IT SOP Number 9.3.6.1: Electronic Security Plan](#).
- ii. Sensitive data in transmission shall be protected in accordance with [IT SOP Number 9.3.5.2: Transmission Security - Encryption](#)
- iii. Security shall be monitored in accordance with [IT SOP Number 9.1.1.4: Information System Activity Review](#)

c. Access Security:

- i. Unique UserIDs will be established in accordance with [IT SOP Number 9.3.1.1: Unique User Identification](#)
- ii. Access will be authorized in accordance with [IT SOP Number 9.1.4.2: Access Authorization](#)
- iii. Access will be established and modified in accordance with [IT SOP Number 9.1.4.3: Access Establishment and Modification](#)

4. Offices Storing and Handling Physical Documents and/or Electronic Information

The following offices do or do not store and handle physical documents and/or electronic information, as indicated; and if they do, they shall supplement this Plan with their own specific plans, which are incorporated into this Plan by reference (links to specific office plans are provided where available):

Units highlighted in red have not submitted current security plans and, until they do so, are not authorized to request computer

account access changes.					
Department	Report	Paper	Electronic	Unit Plan	Reviewed
Admission	VPAF	Yes	Yes	Unit Plan(VPSA)	12/06/07
Air Force Reserve Officer Training Corp	PROV	Yes	Yes	Unit Plan	10/25/07
Alumni Relations	VPIA	Yes	Yes	Unit Plan (VPIA)	02/06/06
Army Reserve Officer Training Corp	PROV	Yes	Yes	Unit Plan	10/25/07
Art	CAS	Yes	Yes	Unit Plan	08/29/06
Associated New American Colleges	AO				
Athletics	VPAD	Yes	No	Unit Plan	09/12/05
Biology	CAS	Yes	No	Unit Plan	09/23/05
Brauer Museum of Art	PROV	No	No	Unit Plan	08/25/05
Career Center	SA	Yes	Yes	Unit Plan	09/09/05
Center for Church Vocations	AO	Yes	Yes	Unit Plan	02/21/07
Chapel	PRES	No	No	Unit Plan	09/17/05
Chemistry	CAS	Yes	Yes	Unit Plan	09/15/05
Chinese/Japanese Studies	CAS	No	No	Unit Plan	01/25/07
Christ College	PROV	No	No	Unit Plan	01/08/07
Church Relations	VPIA	Yes	Yes	Unit Plan	02/03/06
Civil Engineering	COE	Yes	Yes	Unit Plan	11/03/06
College of Arts and Sciences	PROV	Yes	Yes	Unit Plan	11/22/05
College of Business Administration	PROV	Yes	Yes	Unit Plan	05/02/06

College of Engineering	PROV	Yes	No	Unit Plan	09/19/05
College of Nursing	PROV	Yes	Yes	Unit Plan	09/06/05
Communication	CAS	Yes	No	Unit Plan	08/29/05
Community Outreach Partnership Center	PROV				
Continuing Education and Graduate Studies	PROV	Yes	Yes	Unit Plan	02/23/06
Continuing Education	CED	Yes	Yes	Unit Plan (CED)	01/11/06
Counseling Services	SA	Yes	Yes	Unit Plan	09/12/05
Cresset	PRES	No	No	Unit Plan	09/02/05
Dean of Students	SA	Yes	Yes	Unit Plan	09/06/05
Dining Services	VPAD	Yes	No	Unit Plan	09/14/05
Economics	CAS	No	No	Unit Plan	09/09/05
Education	CAS	Yes	Yes	Unit Plan	09/01/05
Education and Formation of People in Faith	PROV	No	No	Unit Plan	09/19/05
Electrical and Computer Engineering	COE	Yes	Yes	Unit Plan	09/03/05
English	CAS	No	No	Unit Plan	09/15/05
Finance Office	VPAD	Yes	Yes	Unit Plan	07/05/06
Financial Aid	VPAF	Yes	Yes	Unit Plan (VPAF)	05/12/06
Foreign Languages and Lits	CAS	Yes	No	Unit Plan	09/02/05
Geography and Meteorology	CAS	Yes	Yes	Unit Plan	11/02/06
Graduate Division	CED	Yes	Yes	Unit Plan (CED)	01/11/06

Greek Affairs and Volunteer Programs	SA	Yes	Yes	Unit Plan	09/14/05
Guild	PRES	No	No	Unit Plan	09/17/05
Health Center	SA	Yes	Yes	Unit Plan	09/29/05
History	CAS	No	No	Unit Plan	09/13/06
Housekeeping Services	VPAD	Yes	Yes	Unit Plan	03/07/06
Human Resources	VPAD	Yes	No	Unit Plan	06/21/07
				Unit Plan	08/22/05
Information Technology	PROV	Yes	Yes	IT Cybersecurity Plan (Access limited).	07/01/06
Initiative for Schools, Industry and Science	PROV	No	No	Unit Plan	11/28/05
Institute for Liturgical Studies	AO				
Institutional Advancements	VPIA	Yes	Yes	Unit Plan (VPIA)	06/20/07
Interlink Language Center	AO	No	Yes	Unit Plan	09/15/05
International Economics & Cultural Affairs	CAS	Yes	Yes	Unit Plan	01/10/06
International Service	PROV				
International Studies Program	PROV	Yes	Yes	Unit Plan	03/07/06
Kade-Duesenberg German	PROV	No	No	Unit Plan	09/20/05

Cultural Center					
Law Library	SL	Yes	Yes	Unit Plan (SL)	08/25/05
Library	PROV	Yes	Yes	Unit Plan	09/19/05
Lilly Fellows Program	PROV	Yes	No	Unit Plan	09/21/05
Lumina Center	CAS	No	No	Unit Plan	02/17/06
Lutheran Deaconess Association	AO	Yes	Yes	Unit Plan	09/30/06
Mail Center	PUR	No	No	Unit Plan	09/19/05
Master of Business Administration	CBA	Yes	Yes	Unit Plan (CBA)	09/13/05
Mathematics and Computer Science	CAS	Yes	No	Unit Plan	08/30/06
Mechanical Engineering	COE	No	No	Unit Plan	09/18/05
Music	CAS	Yes	No	Unit Plan	09/07/05
Office of Multicultural Programs	SA	Yes	Yes	Unit Plan	09/09/05
Payroll	VPAD	Yes	Yes	Unit Plan	09/19/05
Philosophy	CAS	No	No	Unit Plan	08/25/05
Physical Education	CAS	Yes	No	Unit Plan	09/20/05
Physical Plant Services	VPAD	Yes	Yes	Unit Plan	09/02/05
Physics and Astronomy	CAS	Yes	Yes	Unit Plan	08/16/06
Political Science	CAS	Yes	Yes	Unit Plan	08/25/05
President's Office		Yes	Yes	Unit Plan	09/16/05
Provost's Office	PRES	Yes	Yes	Unit Plan	09/06/05
Psychology	CAS	Yes	Yes	Unit Plan	09/08/05
Purchasing and Support	VPAD	Yes	Yes	Unit Plan	09/08/05

Services					
Registrar's Office	PROV	Yes	Yes	Unit Plan	09/09/05
Reserve Officers Training Corps	PROV	No	No	Plan Not Needed	09/20/05
Residential Life	SA	No	No	Unit Plan	09/02/05
School of Law	PROV	Yes	Yes	Unit Plan	08/25/05
Social Work	CAS	No	No	Unit Plan	09/10/05
Sociology and Criminology	CAS	No	No	Unit Plan	11/16/06
Theatre	CAS	Yes	No	Unit Plan	06/18/07
Theology	CAS	No	No	Unit Plan	09/19/05
Union	SA	Yes	Yes	Unit Plan	02/22/07
University Book Center	AO	No	No	Unit Plan	03/20/06
University Development	VPIA	Yes	Yes	Unit Plan (VPIA)	02/03/06
University Marketing	UM	Yes	Yes	Unit Plan	05/08/07
University Relations	PRES	No	No	Unit Plan	09/09/05
Valparaiso University Center for the Arts Support	CAS	Yes	No	Unit Plan	09/14/05
Valparaiso University Police Department	VPAD	Yes	Yes	Unit Plan	09/08/05
Vice President for Administration and Finance	PROV	Yes	Yes	Unit Plan (FO)	07/05/06
Vice President for Admission, Financial Aid, and Marketing	PROV	Yes	Yes	Unit Plan	05/12/06
Vice President for Institutional	PRES	Yes	Yes	Unit Plan	02/03/06

Advancement					
Vice President for Student Affairs	PROV	Yes	Yes	Unit Plan	09/30/05

5. Requirements for Service Providers

These requirements are set forth in [IT SOP 9.1.9 Business Associate \(Outsource\) Contracts and Other Arrangements](#) (login required)

Business Associates (Outsource Service Providers) are listed in [IT SOP 9.1.9.1 Written Contract or Other Arrangements](#) (login required)

6. Managing System Failures

This information is contained in the [IT Disaster Recovery Plan](#) (login required).

7. Review and Evaluation

This Plan shall be reviewed at least annually, and updated as necessary to maintain the requisite level of security and integrity for Customer Information. This evaluation and any attendant adjustment, will be in light of relevant circumstances, including changes in the University's business operations and/or the results of testing and monitoring of the safeguards.

As of May 16, 2006, the review procedure consists of the following steps:

1. Make changes to this document as necessary.
2. Make changes to each document to which this document links, except Unit Security Plans, as necessary.
3. Review Unit table and add or delete units as necessary; for each new unit, contact the head of the unit for a Unit Security Plan (see below).
4. For an annual review (usually conducted in early September), contact head of each unit for an updated Unit Security Plan. Unit heads should fill out the form found at <http://www.valpo.edu/eis/sop/diradm/dirform/glbaform.html>.

When submitted, this form is automatically e-mailed to IT.Office@valpo.edu. The e-mail submission is then manually saved (intact) in /web/intra/htdocs/depts/prov/prov/policy/units/UNIT.html where UNIT is the Datatel abbreviation for the unit, in lowercase. The entry in the Unit table in this document is updated to correspond to the plan.

As of this date, there is no provision for updating an existing Unit Security Plan; the form must be filled out in its entirety each time it is submitted. For the convenience of the unit heads, we have updated unit plans on behalf of unit heads on the basis of their e-mail requests. When this is done, a notation is made in the Unit Security Plan; the date is changed; and the e-mail message requesting the change is appended to the Unit Security Plan.

The Help Desk does not honor requests for access authorization unless the unit has a current Unit Security Plan on file.

At present, Unit Security Plans are not constructed to reflect limited authority (such as permission to request web space only). This is an improvement that may be considered in the future.

5. A Unit Security Plan expires annually or at any change in key personnel. Expired Unit Security plans are unlinked and the table entry in this document is highlighted in red.
6. At each review, annual or otherwise, make the appropriate entry in the table below, and change the dates at the top and bottom of this document.

Valparaiso University Information Security Plan Review Record				
Date	Type of Review	Reason for Review	Person Conducting Review	Comments and Recommendations
12/06/07	change		Dennis A. Trinkle	Admission updated
10/25/07	Initial		Dennis A. Trinkle	Air Force Reserve plan submitted
10/25/07	Initial		Dennis A.	Army Reserve plan

			Trinkle	submitted
06/21/07	Change		Dennis A. Trinkle	Human Resources updated
06/21/07	Change		Dennis A. Trinkle	Institutional Advancement updated
06/18/07	Change		Dennis A. Trinkle	Theatre updated
05/08/07	Initial		Dennis A. Trinkle	University Marketing plan submitted
03/22/07	Change		Dennis A. Trinkle	Admission updated
02/22/07	Change		Dennis A. Trinkle	Union updated
01/25/07	Change		Dennis A. Trinkle	Health Center updated
01/25/07	Initial		Dennis A. Trinkle	Chinese and Japanese Studies submitted
01/08/07	Change		Dennis A. Trinkle	Christ College updated
11/28/06	Change		Dennis A. Trinkle	Lilly Fellows Program updated
11/20/06	Change		Dennis A. Trinkle	Social Work updated
11/16/06	Change		Dennis A. Trinkle	Geography/Meteorology updated
11/16/06	Initial		Dennis A. Trinkle	Sociology and Criminology plan submitted
11/03/06	Change		Dennis A. Trinkle	Civil Engineering updated
11/03/06	Change		Dennis A. Trinkle	Psychology updated
10/19/06	Change		Dennis A. Trinkle	Admissions updated
09/13/06	Initial		Dennis A. Trinkle	History
08/29/06	Change		Dennis A. Trinkle	Admissions updated
08/30/06	Initial		Dennis A. Trinkle	Lutheran Deaconess Association submitted

08/28/06	Initial		Dennis A. Trinkle	Art Department submitted
07/05/06	Change		J. Michael Yohe	Finance Office plan updated
05/16/06	Change		J. Michael Yohe	Review Procedure Documented
05/12/06	Change		J. Michael Yohe	Revised VPAF plan posted
03/20/06	Change		J. Michael Yohe	Line added for UBC
03/07/06	Change		J. Michael Yohe	HKS plan updated; INTS plan added
02/17/06	Change		J. Michael Yohe	Added line for Lumina Center
02/14/06	Change		J. Michael Yohe	Added line for Institute for Liturgical Studies
01/17/06	Change		J. Michael Yohe	Added unit plans for CAS, IECA; replaced unit plan for UNI
01/11/06	Change		J. Michael Yohe	Revised CED (CED, CONT, GRD) plan posted
01/02/06	Change		J. Michael Yohe	Added table entries for COPC, EAST, IECA, ISP
12/22/05	Change		J. Michael Yohe	Changes in CED (CED, CONT, GRD) and HKS staff invalidated Unit Plans
11/28/05	Change		J. Michael Yohe	ISIS plan submitted
9/30/05	Annual		J. Michael Yohe	All departments asked to respond; missing responses are CE, CAS, HIST, ISIS, INTS, MCS, SOCC. Many parts of this plan were made a part of the Cybersecurity Plan and incorporated by reference (hyperlink) in this plan.
05/20/04	Annual		J. Michael Yohe	Departments asked to respond only if needed

06/11/03	Change		J. Michael Yohe	Departments asked to respond only if needed
05/15/03	Initial		J. Michael Yohe	Departments asked to respond only if needed

Previous Plans

- [Fiscal Year 2003 \(First Draft\)](#)
- [Fiscal Year 2003](#)
- [Fiscal Year 2004](#)

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