

Policy and Guidelines for the Handling of Confidential Information

The Florida National University Office of Financial Assistance is committed to safeguarding the confidential information of financial aid applicants and current and past aid recipients. Confidential information is considered to be any non-public information belonging to a student or in some cases parent(s) that if disclosed could place the student or parent(s) at risk of damaging their financial standing, privacy, or reputation. The University is bound by law to protect many types of confidential information. While inclusive of those protections the Office of Financial Assistance operational policy is particularly sensitive to information related to:

- Social Security numbers, driver's license numbers, state identification card numbers, passport numbers, other documents related to immigration status
- Credit and debit card information, and financial account information
- Student records, including but not limited to student education records within the meaning of the Family Educational Rights and Privacy Act
- Information on federal and state income tax returns and associated schedules and forms

Guidelines and Procedures

1. All employees of the Office of Financial Assistance must safeguard confidential information and use it and disclose it only as authorized or required in the course of performing job duties.
2. The Office of Financial Assistance will gather and retain confidential information only to the extent required by federal and state regulations pertaining to the administration of student financial assistance.
3. Confidential information will be disposed of in a secure and safe manner at the conclusion of mandatory retention periods as dictated by federal and state regulations.
4. The Office of Financial Assistance will safeguard confidential data on paper documents by securing the information in individual files locked in restricted storage; confidential information that has been digitize or otherwise presented in an electronic media will be stored in secure formats.
5. Access to the Office of Financial Assistance will be limited to employees who have direct responsibility for the administration of student aid as determined by the Director of Financial. Individuals given access to electronic records will be given unique access credentials and will be required to regularly update passwords.
6. Employees who have any reason to believe or suspect that someone else is using their personal access codes must immediately notify the Director of Financial.
7. Student education records are governed by the Family Educational Rights and Privacy Act (FERPA) and applicable University policy. FERPA-protected student education records must not be disclosed under any circumstances without the written consent of the student (or former student) or as authorized by the University's Registrar.
8. Employees who have access to confidential information will be trained to know and understand associated security requirements and take measures to protect the information.
9. Any employee of the Office of Financial Assistance who is willfully negligent in the handling of confidential information is subject to discipline up to and including termination of employment.