March 13, 2013

MEMORANDUM

To: Deans, Directors, and Chairpersons

Fr: Linda O. Stanford, Associate Provost for Academic Services

Re: Transmission of Personally-Identifiable Information

In order to fulfill usual job responsibilities, often it is necessary to share student and other information that is identifiable as belonging to a specific individual. This memorandum is sent to refer all recipients of this notice to the guidelines to use in order to assure compliance with best practices.

MSU’s Securing Institutional Data website has been updated to include guidelines for transmission of personally-identifiable information via email: http://eis.msu.edu/sid/emailbestpractices.html

For your reference, these guidelines are explained in specific detail below.

MSU is obligated to protect certain types of data. In accordance with the Institutional Data Policy, data are to be used, stored, transferred, disseminated, and disposed of in ways that minimize the potential for their improper disclosure or misuse. Personally-identifiable information may not be transmitted via email, particularly when it is on a regular, scheduled basis. An example of personally-identifiable information is student name and PID.

Alternative approaches include the following:

- transmit PID only or student name only via email
- utilize secure request data boards such as the ones in the Office of Financial Aid and the Office of the Registrar in order to allow individuals to “pick up” their own reports from a secure system
- use password protection for documents sent via email
- burn documents to a CD and hand-deliver
- use a fax machine

The last 4-digits of PID and student name, or PID and only the first and last initials of name (or the first 2-3 letters of student last name) may be transmitted via email under the following circumstances:

- the options above are not feasible or cause undue hardship;
- it is critically important to have personally-identifiable information (e.g. student name and PID) in order to successfully fulfill your job responsibilities; and
- it is a small list of students (i.e. fewer than 10).

If you are the recipient of an email that contains personally-identifiable information, you have the obligation to inform the sender about the appropriate methods for transmitting such data.

For additional information about securing institutional data, please visit: http://eis.msu.edu/sid/.

C: Youatt, Luccock, Davis, Rovig, Ries