

BURRELL COLLEGE OF OSTEOPATHIC MEDICINE

STANDARD OPERATING PROCEDURES

Institutional Data Security		SOP #: IT.002.01
Effective Date	2019-01-15	
Last Revision/Review	12.1.2021	

1. Purpose

This procedure provides for the secure management of Burrell institutional data.

2. Related Policy/Authority

B2050 – Data Security Policy

3. Faculty/Staff Responsibilities

All Burrell employees and contractors are responsible for safeguarding and maintaining the integrity of institutional data.

4. Definitions/Abbreviations

- a. FERPA – Family Educational Rights and Privacy Act
- b. GLBA – Gramm-Leach-Bliley Act
- c. HIPAA – Health Insurance Portability and Accountability Act
- d. Institutional Data - Institutional data is defined as all information, documents and other data, regardless of physical form or location that is used, created, received, maintained or held by or on behalf of Burrell in the course of college business.

5. Procedural Steps

- a. Authorized Access to Institutional Data - Access to, distribution and/or any other use of institutional data is based on an employee's position and duties. Such access shall be granted and monitored through the employee's supervisor by the appropriate records custodian and the appropriate vice president, dean or director. All employees shall comply with applicable federal and state laws, including FERPA, GLBA, and HIPAA, as well as with applicable college policies relating to the secure access, maintenance, distribution, storage or other use of institutional data.
- b. All employees authorized to access Burrell central computer systems, including but not limited to GP Dynamics, CAMS, and AMP, shall be given and shall sign a *Non-Disclosure of Sensitive/Confidential Information Employee Notification* form. The lack of a signed Non-Disclosure form shall not relieve the employee of the responsibility to comply with applicable state and federal law and BCOM policies relating to the secure access, maintenance, distribution, storage or other use of institutional data. Employees with access to institutional data shall not access, distribute or otherwise use such information for any purpose other than those required to perform their job duties.
- c. Transmission of college data to other persons or entities affiliated with Burrell, such as third party vendors, must have prior approval by the appropriate vice president/dean/director and the appropriate records custodian.
- d. Employees shall not transfer their authority for access to institutional data to any person.

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- e. Employees with access to institutional data shall not access, distribute or otherwise use such information for any purpose other than those required to perform their job duties.
- f. Users with access to institutional data shall maintain reasonable measures to ensure the security of the data. The following requirements must be observed:
 - i. Institutional data shall only be stored on Burrell-owned computers or on computers owned by contractors to the college.
 - ii. Institutional data must be removed from computing devices when the data is no longer required.
 - iii. Regular backups shall be performed on computing devices that store institutional data.
 - iv. Institutional data should be encrypted on computing devices that store institutional data.
 - v. Institutional data shall not be stored on removable media unless approved by the appropriate data custodian.
- g. Users with access to institutional data shall maintain reasonable measures to ensure the security of the data. All desktop computers and portable computing devices that hold institutional data, including Burrell-owned devices used at home, shall:
 - i. Have automatic updates enabled to the operating system and virus protection as appropriate.
 - ii. Require a password for access when started or rebooted.
 - iii. Use a password-protected screen saver that locks access when unattended.
- h. Not run file sharing software, in particular software that allows the sharing of music and videos.

6. Reports/Charts/Forms/Attachments/Cross References

7. Maintenance

Reviewed annually by CIO and IT Director

8. Signature

Signature on File

Asst. VP of Administration / CIO

12.1.2021

Date

9. Distribution List

Internal

10. Revision History

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Revision Date	Subsection #	Summary of Changes	New/Cancellation/Replacement Procedure? (if applicable)	Approval Date
2021-12-01		Cited related policy, fixed typographical errors		12.2.2021