Storing PII and FERPA Education Records

A Practical Guide for Instructors

This document supplements the [Data Handling Procedures](#) related to University Policy 97. Not following these guidelines or university policy by storing PII/FERPA data in un-sanctioned locations may introduce you to some level of personal liability in the case of a data breach.

Where to Store PII and/or FERPA Education Records[1] (Yellow Data):

1. On your Mercury personal or departmental folders (i.e. P-drive or H-drive)
2. On your OneDrive storage or in Blackboard
3. On any WCU owned device that is a member of the WCU domain; preferably in you're *My Documents* folder (*Documents* folder on Macintosh computers) or a subfolder under that
4. As an encrypted file using password-protection provided by Microsoft Office, Adobe or WinZip
5. On any device or partition that is encrypted and the encryption key and/or access password is not generally known[2]. This includes removable storage such as external hard drives.

Do Not Store Personally Identifiable Information and/or FERPA Records:
- On "cloud" services not supported by WCU (i.e. something other than OneDrive or Blackboard)
- Never email PII or FERPA Education Records from a non-university email address
- On a personal device or removable storage where the data is not encrypted.

Best Practice:
- You should only store the amount of PII or FERPA Education Records that you need to perform your job duties. For example, student name, Student ID, and student email address are sufficient for most class type files.
- Never store Social Security Numbers, the final four digits of a person's Social Security Number, driver's license numbers, credit card numbers, birthdates, etc.
- Do not "warehouse" PII or FERPA Education Records on your local and/or personal device. Delete, pursuant to University of North Carolina policy[3], any locally stored PII and/or FERPA Education Records when their usefulness has passed.
- Archive prior term PII and/or FERPA Education Records to secure storage on a university maintained server.
- Never transmit PII or FERPA Education Records via an unsecure connection or program.

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[1] FERPA Education Records may include, but are not limited to written documents such as student grades, student assignments, student communication(s), other communication(s) regarding students, and/or any other documentation/information that may be personally identifiable to a student or students.

[2] Please contact the WCU IT Help Desk if you need advice or assistance with regard to encryption.

[3] WCU University Policy 108, "Record Retention and Disposition"