Storing PII and FERPA Education Records
A Practical Guide for Instructors

Where to Store Personally Identifiable Information (PII) and/or FERPA Education Records\(^1\)
(In order of preference):

1. On a WCU network drive designated by WCU Information Technology as secure storage. If a secure location has been designated for the type of file you are creating store your files there. When a location has not been specified `\Mercury` should be used.
2. On any WCU owned device that is a member of the WCU domain; preferably in your `My Documents` folder (`Documents` folder on Macintosh computers) or a subfolder under your `My Documents` (or Macintosh `Documents`) folder.
3. On any device or partition that is encrypted and the encryption key and/or access password is not generally known\(^2\).

Do Not Store Personally Identifiable Information and/or FERPA Records:
- In the “cloud”.
- In a non-university email inbox.

On Non-university Devices
- If you must store PII and/or FERPA Education Records on a non-university device, records must be encrypted.\(^2\)

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, etc.
- Keep any PII or FERPA Education Records stored on local and/or personal devices to a minimum.
- 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 store PII or FERPA Education Records on a portable hard drive.
- Never transfer or transmit PII or FERPA Education Records via an unsecure connection or program (e.g., Dropbox).
- Never email PII or FERPA Education Records to non-university email addresses.

Source: Data Security and Stewardship Committee (DSSC), April 11, 2012

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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”