

***Privacy Procedures for Distance  
Education and Correspondence  
Education***



**Louisiana State University at Eunice**

**January 11, 2023**

# Privacy Procedures for Distance Education and Correspondence Education

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### Statement of Privacy for Distance and Correspondence Education

Louisiana State University at Eunice is committed to protecting student privacy while using technology to provide a safe online experience. LSU Eunice will not disclose student personal information except as may be required to do so by state or federal law. Student records, including academic and financial records, are protected by the Family Educational Rights and Privacy Act and will not be released without the prior written consent of a student, except as permitted by applicable state and/or federal law.

### Family Educational Rights and Privacy Act (FERPA)

LSU Eunice complies with all of the requirements of the Family Educational Rights and Privacy Act and is committed to protecting the privacy of student records independent of course delivery methodology. The LSU Eunice Registrar is the point of contact for all FERPA related issues with information for both [students](#) and [parents](#). Involved parties may also consult the [LSU Eunice Catalog](#)<sup>1</sup> and LSU Eunice [Policy Statement Number 34: Privacy Rights of Parents and Students](#). Questions may be addressed to the Office of the Registrar in the Geaux Center of the Dr. Anthony Mumphrey Center Room 117, 337-550-1302, or at [registrar@lsue.edu](mailto:registrar@lsue.edu).

### Secure Name and Password

New employees of LSU Eunice are issued a unique username and password during the on-boarding process and all LSU Eunice students are issued a unique student identification (ID) number during the admissions process. The student ID number and employee username become the unique identifier for students and employees at LSU Eunice. The student ID number and employee usernames differs from social security numbers, which are never used for academic activity, either online or in-person.

The student ID number and employee username, along with a unique password, are required to access all resources including myLSUE. MyLSUE is the LSU Eunice web-based information system that students, including students enrolled in distance education courses, use for course registration and to access grades, textbook information, financial information, personal directory information, and more. Students or employees needing assistance with username and password are directed to the Office of Information Technology in the Community Education Building Room 204, 337-550-1307, or at [it@lsue.edu](mailto:it@lsue.edu).

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<sup>1</sup> Click on Campus Regulations in the navigation bar to the left and then click on Privacy and Release of Student Education Records.

Students and employees are responsible for keeping their password secret and confidential, and for notifying the Office of Information Technology or other University personnel if they believe that their student number and/or password is being misused.

Students may be charged with violating Behavioral Misconduct for Computer Misuse in the [Student Code of Conduct](#) defined as:

Unauthorized access or entry into a computer, computer system, network, software, or data; alteration of computer equipment, software, network or data; failing to comply with laws, license agreements, and contracts governing network, software and hardware use; using University computing resources for prohibited activities; using University computing resources for unauthorized solicitation or commercial purposes or any violation of University computer policies (see page 24).

Students may also be charged with Behavioral Misconduct for Identity Misuse defined as:

Illegal or unauthorized use of an identification card, password, access code or number; including, but not limited to permitting another student or non-student to use a University or government-issued identification card; alteration or sale of an identification card (see page 26).

Outcomes for violating the Student Code of Conduct range from a warning to an interim suspension when it is determined that a student's continued presence on campus constitutes an immediate threat of harm to student(s), other individuals and/or University premises. Expulsion is also possible depending on the circumstances of the case. Questions on the Student Code of Conduct related to computer or identity misuse may be directed to the Office of Student Affairs in the Dr. Anthony Mumphrey Center Room 112, phone 337-550-1218, or [stuaff@lsue.edu](mailto:stuaff@lsue.edu).

The student information system (SIS) data, including students enrolled in distance education courses, is stored on servers that have limited accessibility. The SIS is hosted in the cloud with LSU Eunice's student system partner Jenzabar. The environment utilizes IBM commercial datacenters with proprietary design and hardened construction offering 24x7 availability, including high availability and fail-over provisioning. The IBM Datacenters are located in Dallas and Washington DC. If there is ever a disaster, the system would be restored to the alternative data center. Jenzabar ensures the following regularly for the environment: SSAE-16 certification with annual SOC-1, -2, and -3 audits, PCI and HIPAA compliance, along with ISO 27001, 27017, and 27018 certifications.

### **Distance Education Security**

Students enrolling in distance education courses at LSU Eunice access the learning environment through the Learning Management System (LMS). The LMS is a set of software tools that provides an online environment for course interactions. Faculty and students access the LMS using a personal login and password. Upon initial login, all users are required to change their password for an added level of security. In addition,

LSU Eunice utilizes Single Sign On whereby faculty, staff, and students must provide a unique login ID and password to gain access. When off campus LSU Eunice utilizes Multi-Factor Authentication requiring faculty, staff, and students to provide additional verification factors in order to gain access.

Several LSU Eunice Policy Statements define the roles and responsibilities of University personnel along with the segregation of duties to further protect the privacy of individual users, including students enrolled in distance education courses.<sup>2</sup> Other Information Technology Policies state that university personnel

- have “least privilege” access meaning that personnel have the necessary privileges to complete their tasks (see [Policy Statement Number 121 Standard 2](#)).
- may use only the single sign on account provided to them and may not share login credentials with other University or unauthorized personnel (see [Policy Statement Number 121 Standard 3](#)).
- must not install any software without approval as outlined in the process for software acquisition (see [Policy Statement Number 121 Standard 3](#))
- must follow applicable laws and are not permitted to perform any type of network analysis, or monopolize shared network resources (see [Policy Statement Number 121 Standard 1](#)).
- must maintain the security of appropriate data and maintain the privacy of computing resources (see LSU Eunice [Policy Statement Number 65.4](#) and [Number 65.5](#)).
- may not share sensitive data to third parties except as required by law (see [Policy Statement Number 124 Standard 4](#)).
- must only transmit sensitive data with the use of encryption (see [Policy Statement Number 121 Standard 3](#)).
- report all security incidents to the Office of Information Technology (see [Policy Statement Number 121 Standard 4](#)).

[Policy Statement Number 34](#): Privacy Rights of Parents and Students states that faculty members are responsible for maintaining the privacy of students’ grades for any course or for any activity (project/test/quiz/paper) which is part of a course and that a violation of the policy occurs if a student’s grade is

- openly discussed in class.
- visible to any other student.
- publicly posted in a personally identifiable manner.
- released over the telephone to anyone other than the student or the parents of a dependent student.

The LMS data, including students enrolled in distance education courses, is stored on servers that have limited accessibility. Only course-specific data is stored on the LMS

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<sup>2</sup> See LSU Eunice [Policy Statement 120 Standard 1](#) for roles and responsibilities; [120 Standard 2](#) for segregation of duties;

server. No financial aid information, transcripts, or other sensitive information is stored on the LMS server. LSU Eunice partners with LSU to have the system hosted in the cloud with Open LMS. The environment utilizes Amazon Web Services' (AWS) cloud environment, which provides nearly limitless resources within a secure hosting environment. The AWS environment leverages multiple "Availability Zones". If a failure occurs on resources in one Availability Zone, servers in the other Availability Zones maintain continuity of service, and additional resources are brought online in other Availability Zones in near-real time to ensure the system maintains the needed capacity. The AWS hosting environment holds compliance certifications including ISO 27001, ISO 9001, SOC, amongst others. Third party AWS SOC assessments of the AWS hosting environment are conducted twice annually. Third party application vulnerability assessments are performed at each release (twice per year).

### **Website Privacy**

This privacy statement applies only to the information collected by web addresses in the lsue.edu domain or by other systems controlled by LSU Eunice and to information collected by or submitted to official LSU Eunice web pages. As a general rule, visitor profiles are not tracked; however, LSU Eunice does analyze traffic and access information for resource management and site planning purposes. LSU Eunice reserves the right to log data to investigate resource management or security concerns.

LSU Eunice receives information via two primary methods:

- Information collected automatically via websites
- Information voluntarily provided by the user in order to receive information and/or services (via web forms and email).

### **Information Collection**

#### **Automatic Collection**

If a user has not taken specific steps to anonymize their personal web traffic (e.g. apply mechanisms such as the Google Analytics Opt-out Browser Add-on that disable the collection of data for analytical purposes), official LSU Eunice websites may collect certain information automatically. This information includes, but is not limited to

- User's Internet protocol (IP) address,
- Internet service provider,
- Operating system,
- The time and date of the visit,
- Browser,
- The site from which the user visited, and
- Cookie information (if applicable).

Any information collected automatically is not associated with any other information held by LSU Eunice (i.e. not linked with information voluntarily provided to LSU Eunice) unless LSU Eunice is required to do so by state or federal law.

## **Voluntary Submission**

In order to provide information and/or services, LSU Eunice may request users to provide personal data, some of which may be personally identifiable information. Information such as name, date of birth, email address, etc. can be collected via voluntary submission to an LSU Eunice entity.

## **Information Use**

Website information that is gathered automatically is utilized to improve the understanding of how LSU Eunice provided websites are being leveraged by the user community. For example, some LSU Eunice websites use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses “cookies” (i.e. files used to track website activity) to determine how users navigate LSU Eunice sites. Google uses this cookie data for various purposes, including the evaluation of website use, reports on website activity, and other services. Please visit the following pages for more information on Google Analytics’ [terms of use](#) and Google’s [privacy practices](#).

Any information submitted to LSU Eunice voluntarily in order to receive services and/or information will only be utilized to conduct official university business. LSU Eunice may disseminate voluntarily submitted information to third parties and offices/departments within LSU Eunice to the extent necessary in order to provide the requested services and/or information. LSU Eunice may also disseminate such information if required by applicable law-enforcement agencies.

LSU Eunice will not disclose any information submitted voluntarily for reasons other than mentioned above, without clear notice and the opportunity to opt-out or otherwise prohibit such uses. LSU Eunice will never sell or trade voluntarily submitted information to other entities unless a prior consent has been obtained and/or such information is shared in response to a subpoena, court order, or legal process.

There is no legal requirement for a user to provide any information to LSU Eunice. However, without certain information, LSU Eunice websites and services may not function as intended and features may be inaccessible.

## **Cookies**

Some LSU Eunice websites use cookies (beyond cookies utilized by Google Analytics), which enable LSU Eunice to further tailor its web services to the needs of the user community. Cookie data assists the University in improving both web content and distribution. Users have the right to refuse the use of cookies by implementing technical configurations in their web browsers; however, functionalities of certain sites may be impacted if such configurations are implemented. In addition, users should log off public computers when their sessions are completed.

Content and tools used in conjunction with LSU Eunice’s LMS may install additional cookies on a user’s computer. This third-party content may include cookies from the content issuer. These third-party sites have separate and independent privacy policies. LSU Eunice therefore has no responsibility or liability for the content and activities of

these linked sites. For a user's protection, LSU Eunice suggests that the privacy and security policies of the company websites be reviewed for each link.

Rejecting cookies still allows the user access to LSU Eunice's website but access to some areas will be limited or denied. LSU Eunice requires the use of cookies to access all computing resources.

### **Links to External Sites**

Some LSU Eunice sites may contain links to external websites not owned by, or officially affiliated with, LSU Eunice in any way. If a user decides to navigate to external links, he/she will leave the LSU Eunice website and thus, the University is not responsible for privacy practices or the content of such websites. Navigating to external links is done at the user's own risk and users should be aware that LSU Eunice's policies no longer apply. LSU Eunice recommends that users review the privacy policy and applicable terms of all sites they visit.

### **Data Security**

LSU Eunice implements stringent security measures wherever possible to promote confidentiality, integrity, and availability of any information in the possession of LSU Eunice. Personal information voluntarily submitted via email cannot leverage encryption in most cases, and thus email is not a mechanism that LSU Eunice recommends for submitting confidential and/or personal data. Users that submit unsolicited confidential and/or personal information via email must do so at their own risk.

LSU Eunice reserves the right to work with third-party vendors and to host this information for LSU Eunice purposes and in accordance with this privacy procedure. Each web page requesting information at LSU Eunice discloses the purposes of that information.

While the security of user data is of the utmost importance to LSU Eunice, due to the nature of Internet communications, no data transmission over the Internet can be guaranteed to be completely secure. Any information transmitted to LSU Eunice by the user is done so at the user's own risk. Once the information is received by LSU Eunice, the University will make every effort to ensure the security of data on LSU Eunice's systems.

### **Louisiana Public Records Law**

LSU Eunice's privacy statement and public records are governed by applicable state and federal laws. Pursuant to Louisiana Public Records Laws, certain records are subject to inspection and disclosure to the public. There is no legal requirement for a user to provide any information at LSU Eunice's website but the website will only work with routing and essential technical information. All email addresses are public records, so if an email is sent to LSU Eunice, the University may be required to release it in response to a public records request.

### **Changes to this Privacy Statement**

LSU Eunice may occasionally update this Statement of Distance and Correspondence Education Privacy, and encourages students and employees to periodically review this Statement to remain informed of how LSU Eunice is protecting distance education students' information.

### **Contact Information**

Questions about website security or data security along with reporting issues or filing a complaint may be addressed to the Office of Information Technology in the Community Education Building Room 204, 337-550-1307, or at [it@lsue.edu](mailto:it@lsue.edu).

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