ELIZABETH CITY STATE UNIVERSITY
Information Security Plan

1. Preamble

Elizabeth City State University (ECSU) has established this plan to comply with the federal law on safeguarding customer financial information. In accordance with the Gramm-Leach-Bailey Act (http://banking.senate.gov/conf/grmleach.htm), ECSU has developed certain administrative, technical or physical safeguards pertaining to accessing, collecting, distributing, processing, protecting, storing, using transmitting, disposing of or otherwise handling customer information, as defined in Section VII.A below. The safeguards collectively constitute the university’s information security program.

2. Information Security Plan Coordinator

The Director of Network Services is designated as the coordinator for ECSU’s information security program.

The coordinator shall assist the university community in identifying reasonable, foreseeable internal and external risks to the security, confidentiality, and integrity of customer information that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information and assess the sufficiency of any safeguards in place to control these risks.

3. Risk Assessment and Safeguards

As part of the risk assessment, the coordinator shall work with all segments of the university community to identify possible or existing risks to security and privacy of customer information. Division heads shall be responsible for conducting periodic data security reviews under the Coordinator’s guidance.

The coordinator, as part of the risk assessment, shall determine possible or existing risks with the university’s information systems, including network and software design, as well as information processing, storage, transmission and disposal.

The coordinator, as part of the risk assessment, shall make reasonable efforts to detect, prevent and respond to attacks, intrusions or other system failures.

The coordinator, as part of the risk assessment, shall design and implement information safeguards to control risks identified through risk assessment and regularly test or otherwise monitor the effectiveness of the safeguards’ key controls, systems, and procedures.
4. Employee Training and Education

Training and education sessions will be developed (by whom) for all university employees who have access to covered data including but not limited to: (1) employees within the Information and Technology Department who have general access to university data; (2) employees who are custodians of covered data and (3) employees who utilize covered data in carrying out job responsibilities.

5. Oversight of Service Providers and Contracts

ECSU shall take reasonable efforts to select Service Providers, as defined in Section 7.B. below, who implement and maintain the required safeguards for customer information. The Office of Business and Finance, in consultation with the Assistant to the Chancellor for Legal Affairs, shall make written requests of all Service Providers to provide assurances of compliance with the GLB Act.

All contracts entered into prior to June 24, 2002 shall be grandfathered until May 24, 2004.


This plan shall be subject to an annual review to ensure continued compliance with applicable laws and regulations.

7. Definitions

A. Customer information refers to any record containing nonpublic personal information as defined by 16 CFR 313.3(n)(1)\(^1\) whether in paper, electronic, or other form than is handled or maintained by or on behalf of ECSU.

B. Service Provider refers to any person or entity that receives, maintains, processes, or otherwise is permitted access to customer information through its provision of services directly to ECSU.

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\(^1\) 16 CFR Part 313.3(n)(1) defines nonpublic personal information as “personally identifiable financial information; and any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publically available.” An example includes information that a student provides on the Free Application for Federal Student Aid (FAFSA).