

**Spring Hill College's
Privacy of Students Enrolled in Distance Education
Security Measures Procedures**

Secure Login Credentials

The learning management system (LMS) for Spring Hill College is Schoology. The College provides a universal login credential to access Schoology, Gmail, and BadgerWeb. Student logins for Schoology, Spring Hill's email system (Gmail), as well as the BadgerWeb student information system, are authenticated via Microsoft Active Directory. This is the same security mechanism that is used for authentication for their academic schedules and records. Initial passwords are randomly generated and contain no identifying information (e.g., Social Security number) that could be linked to the student.

Student numbers (ID) do not contain any identifying information. They are automatically generated serial numbers from the ID record that are created at the time of the record. The ID record is the basic record for all persons and entities such as businesses. Therefore, ID records and ID numbers do not all belong to students. For instance, all accepted prospective students account for more ID numbers than those who enroll. New student IDs may be ascending but not consecutive. For example, 356232 might be a student, 356233 a business, 356234 a high school, and 356235 another student.

Gmail security measures apply to students enrolled in Google Classrooms, a supported alternative LMS for Spring Hill College. For Google Classrooms, enrollment is verified by instructors via BadgerWeb (student information system) rosters. The instructor emails the link to join the Google Classroom. The invite is generated from within the school's email system (Gmail), which is part of Spring Hill College's Google Apps for Education. Only verified educational institutions can participate in Google's Apps for Education program. Google complies with applicable U.S. privacy law, and the Google Apps Terms of Service specifically details obligations and compliance with FERPA (Family Educational Rights and Privacy Act) regulations. (1)

Online Data Protection

Spring Hill College delivers privacy information to students and parents through the Registrar's BadgerWeb page (2). Spring Hill College instructors using online educational resources for grading must post grades securely, visible only by each individual student, in her password-protected account. To further protect the privacy of students, all instructors must contact students using either Spring Hill College email, BadgerWeb, or the designated LMS email tools. Within these secure systems, students cannot view private emails sent to other students.

Schoology and Google utilize role-based data access privileges. This limits access to secure user information on a need-to-know basis for customer support and system maintenance personnel.

Documentation:

1. Google Apps Term of Service regarding FERPA: (See 7.4)
http://www.google.com/apps/intl/en/terms/education_terms.html
2. FERPA Statement

https://badgerweb.shc.edu/ICS/Registrar/Registrar's_Office.jnz?portlet=FERPA_Statement