Data Governance Council Minutes
11-12:30 Wednesday, April 20th 2016
Hamilton Hall 214/WebEx

Jerry Sheehan (Chair)  Joann Stryker  Alisha Schroeder
Paul Lambeth – Not Present  Terry Leist  Dave Bonilla
Chris Fastnow – Ian Godwin delegate  Kathy Attebury  Ron Larsen
Cathy Hasenpflug  Adam Edelman  Kellie Peterson
Laura Humberger  Chris Kearns  Brian Rossmann

I. Call to Order, Announcements

II. Montana State University Policy and Practice Involving the GID

A. Presentation by Legal Counsel

B. Discussion

GID’s are used as an identifier and a credential. GID is currently printed on student (and employee) ID’s.

The institution has been careful about how it handles and manages the GID, secure storage is required (Knox and Box).

Cathy Hasenpflug asked if there is variation in the current practices in terms of employee information. Even though FERPA doesn’t apply to employees, the last 4 digits of a GID can be sent electronically but full GID should not be emailed.

There is a fair degree of variance in the current practice, especially across departments. It is inconsistent across departments and across schools. The GID is a credential and is used as a way to gain access to systems and is also a way to authenticate. Sometimes 3rd party systems require use of the GID instead of NetID for login. MSU preference is to use NetID but with many 3rd party systems that have been around a long time there is still use of GID as credential.

Institutional handling of the GID has historically been directed by legal counsel.

FERPA protects data that can give information about a student that the student would want to keep private. Some information is considered directory information. GID is not designated as directory information unless GID is not used to gain access to education records.

There was discussion regarding designating the GID as directory information. It was discussed this could work if every login required needed a GID and a password. It was also discussed that if GID were designated as directory information and date of birth (DOB) were the other piece of information needed to log in to a system, the DOB credential would have to be changed due to the fact that DOB is designated as directory information.

If GID were designated as directory information and MSU had a breach, MSU would risk losing any federal funding it currently has. There is also the publicity factor – is MSU seen as an institution that doesn’t
adequately protect info about its students? The risk of a breach is a low risk but has a profound penalty if it does happen.

Registrar’s perspective about desire to transmit full GID to students electronically: Chris Kearns stated that one of the big challenges is getting students plugged in at the beginning of the orientation process/summer when they initially need their GID. GID is currently communicated to students and parents through paper. Registrar office staff spend a lot of time answering phone calls and authenticating people over the phone. If GID could be sent electronically to students it would lower the office workload.

The point was made that the GID was meant to be a proxy for social security number. Laura asked if the last 4 digits of the GID could be designated as directory info. MSU sends out an annual notice stating what is considered directory information.

It was discussed that there are several “groups” that GID holders could fit into (Employee, Student, Student Employee), and that all groups should probably be treated the same way since it isn’t always possible to tell who is a student and who is an employee or student employee.

The Library currently uses both GID and NetID but only uses GID for checking out physical materials at the desk. Personnel must key in the entire GID, there is no card scanner. The Library is in the process of moving to a new system. The Library would be happy to use NetID as identifier, but problem is the NetID isn’t on student and employee ID’s (catcards).

Laura stated that her office doesn’t communicate GID at all through email.

Ron brought up the question that if the GID and NetID are both unique ID’s why do we need 2? The bulk of this issue sits in MyInfo which is the front door to all the Ellucian information. Initially there wasn’t a way to crosswalk those systems due to the nature of the password reset. Moves have been made to simplify the way people can log in. The hope is that the identity services that have been promised for a year from Ellucian are in a state where MSU can test against them. Would be ideal to eliminate SS # and GID as being ways users can log in. This would probably take 6-9 months since it is a major transition in terms of infrastructure. MSU also has legacy systems that MSU personnel has self-written. The question is whether or not MSU is willing to accept the risk for those systems. What is likely timeframe for eliminating the GID as authorization token for MyInfo?

The main question is how the GID can get communicated in an efficient way, mainly to external people not on campus. What other problems are presented by the fact that MSU is using, but can’t share the GID electronically? Most systems don’t contain both GID and NetID. Jerry mentioned that there are barriers to ongoing processes that are frustrating as well as barriers on the front end that may be off putting.

Joann agreed that the MSU position regarding the GID needs to be either clarified or changed. She did not have any additional concerns that had not already been raised in the discussion.

Dave added that from the IT side of things, he would like to have a conversation with the Great Falls Registrar and Admissions folks and get back to Jerry with more info.

Alisha didn’t have any additional concerns.
III. Data Stewardship Policy Discussion

200.40 Should authority and responsibility be generic across all campuses at a system level? Certain University personnel are identified as Data Stewards with responsibility for the protection and appropriate use of data across the institution.

200.80 – How do we deal with individual donations? Other campuses need to identify who the financial data person is on their campuses.

The Generated ID - GID

GIDs are used as an identifier and a credential

- As an identifier:
  - Used by nearly every academic and administrative unit on campus to identify individuals and their respective records
  - GIDs are also used by offices such as the IT Service Desk, Human Resources, and the Registrar’s Office as one piece of establishing an appropriate level of assurance that an individual is who they say they are

- As a credential (with PIN):
  - To access MyInfo
  - Other Banner applications (typically containing sensitive information)

GED Handling- Current Approach

Per the Data Stewardship Policy and Standards

- GIDs (along with any other FERPA protected data) should only be stored on Box or Knox
- Cannot be transmitted via email or other unencrypted means
- Cannot be physically posted
- Use of last 4 digits have been allowed, but explicit student permission required
300.00 Jerry will come back with a timeframe for the data stewardship standards.

It was discussed that examples of data need to be spelled out in the footnotes.

**IV. Action Items**

<table>
<thead>
<tr>
<th>Owner</th>
<th>Action</th>
<th>Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dave Bonilla</td>
<td>Have a conversation with the GF Registrar and Admission folks regarding their view of GID, transmitting it electronically, etc.</td>
<td>Next Meeting</td>
</tr>
<tr>
<td>All Campuses</td>
<td>Go back and clarify where the NetID and GID are used from system login perspectives (current practices, current awareness about what is allowed and what isn’t) on each campus so we can better understand risk.</td>
<td>Next Meeting</td>
</tr>
<tr>
<td>All Campuses</td>
<td>Identify and send to Jerry or Desirae who the financial data steward is on each campus.</td>
<td>Next Meeting</td>
</tr>
<tr>
<td>Jerry Sheehan</td>
<td>Edit Data Stewardship Policy based on discussion and feedback in meeting and send out electronically before the next meeting for review. The updated Policy will be taken into the next meeting as a voting item.</td>
<td>Next Meeting</td>
</tr>
<tr>
<td>Jerry Sheehan</td>
<td>Come up with a timeframe for the campus specific standards and procedures</td>
<td>Next Meeting</td>
</tr>
</tbody>
</table>

**Next Meeting: Tuesday, May 24th 2016| 1-2 pm | Hamilton Hall 214/Webex**