

1. **Date:** March 25, 2020
2. **Name:** Louisiana State University at Eunice
3. **Mailing Address:** 2048 Johnson Highway Eunice, LA 70535
4. **Dates of the Committee Visit:** Not Applicable
5. **Type of Report:** Referral Report for Standard 10.6b
6. **Name of Person Submitting the Report:**
Dr. Paul Fowler
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337-305-1792 (cell).

This Referral Report deals with Standard 10.6

(Distance and correspondence education)

This standard expects an institution that offers distance or correspondence education to (a) ensure that the student who registers in a distance or correspondence education course or program is the same student who participates in and completes the course or program and receives the credit; **(b) have a written procedure for protecting the privacy of students enrolled in distance and correspondence education courses or programs**; and (c) ensure that students are notified, in writing at the time of registration or enrollment, of any projected additional student charges associated with verification of student identity.

Fifth-Year Interim Committee Response:

The institution demonstrated its commitment to and adoption of privacy protections offered to students under the Family Education Rights and Privacy Act (FERPA). Institutional policy states these protections apply to all students, regardless of the mode of course or program instruction. However, the Committee could find no evidence that the institution has a written procedure which addresses the privacy issues unique to students enrolled in distance or correspondence education.

The institution should demonstrate that it has such a written procedure which provides for students enrolled in distance or correspondence education the protections outlined in policy.

Louisiana State University at Eunice Response:

The Privacy Procedure for Distance and Correspondence Education is published at:

https://www.lsu.edu/informationtech/it_policies/Final%203-20-2020%20DE%20Privacy%20Rights%20Procedure.pdf

For convenience, a link to the procedure was created on the "[Students](#)" website and the "[Faculty/Staff](#)" website

March 23, 2020 Email to all Students and Faculty/staff

An email was sent to all [current students](#) and [faculty/staff](#) to inform them of the procedure.

The actual privacy procedure follows.

Privacy Procedures for Distance Education and Correspondence Education

Statement of Privacy for Distance and Correspondence Education

LSU 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 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)

Louisiana State University at 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](#) 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 Acadian Center Room 117, 337-550-1302, or at registrar@lsue.edu.

Secure Name and Password

New employees of LSU Eunice are issued a unique user name 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 user name become the unique identifier for students and employees at LSU Eunice. The student ID number and employee user names differs from social security numbers, which are never used for academic activity, either online or in-person.

The student ID number and employee user name, 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 user name 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.

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 LSU Eunice computer policies (see page 19).

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 issued identification card; alteration or sale of an identification card (see pages 20-21).

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 Acadian Center Room 112, 337-550-1218, or studentaffairs@lsue.edu.

According to LSU Eunice [Policy Statement Number 65](#): Administrative Computing Policy, faculty and staff may lose computing privileges, be subject to the normal disciplinary procedures, or face prosecution from state or federal authorities for violations of the University computing policies (see lines 63-67).

Student data, including students enrolled in distance education courses, is stored on servers that have limited accessibility – both electronically and physically – to only those University employees maintaining the servers. The physical location of the student database server is in the vault located in the Information Technology suite. This data is backed up daily at an off-site location. Any damage to the LSU Eunice infrastructure will not affect the server located at the off-site location.

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.

Two LSU Eunice Policy Statements define the responsibilities of university personnel to further protect the privacy of individual users, including students enrolled in distance education courses. [Policy Statement Number 65](#): Administrative Computing Policy states that university personnel

- may use only the computer accounts provided to them.
- must report any attempt a bypassing security mechanisms to the Office of Information Technology.

- may not use or modify sensitive data in a way not explicitly authorized.
- may not permit unauthorized persons' access to the computing facilities (see lines 19-28).

[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.
- publically posted in a personally identifiable manner.
- released over the telephone to anyone other than the student or the parents of a dependent student (see lines 19-25).

In the LMS, faculty are restricted to accessing information within the courses that they teach and students are restricted to faculty-published information in the courses in which they are enrolled. In the secure environment of the LMS, faculty members may post course materials, assignments and exams, and discussion forums for their courses, and students may participate in forum discussions, upload assignments, and take quizzes and exams. Privacy also extends to student likenesses including videos and/or pictures within the course environment. In addition, student privacy must be maintained for course content on platforms such as Google Docs and other widely available platforms.

The Office of Information Technology limits administrative access to University employees that directly manage the LMS including the location of the server in the Information Technology Suite. The Office of Information Technology stores data in electronic form only. Only course-specific data is stored on the LMS server. No financial aid information, transcripts, or other sensitive information is stored on the LMS server. Servers are backed up daily and are protected from outside parties.

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
- 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 being 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.

Posted March 20, 2020