

A7.023     Security Guidelines and Procedures:  
          Student Information Management System (SIMS)

1.     Purpose

To implement the security objectives of the SIMS Data Administration Policy as set forth in Executive Policy E7.104.

2.     Objectives

- a.     To ensure the security and privacy of student records maintained in the University of Hawai'i's (UH) SIMS database.
- b.     To set forth guidelines and standards for responsible and acceptable use of SIMS.
- c.     To supplement existing UH policies/agreements and state and federal laws/regulations.

3.     Policy Statement

Access to SIMS data is to be granted only to UH regular employees who demonstrate that in the course of exercising their officially assigned responsibilities, they have a need for specific information. With special permission, a student researcher may be granted access. Restrictions will apply to all SIMS data stored on the UH administrative mainframe and SIMS downloaded data stored in mini-computers and micro-computers.

4.     Definitions

- a.     Executive Policy E7.104—Establishes a Student Information Management System (SIMS) for

University administration; establishes uniform data standards that ensures consistency, comparability, accuracy and integrity of SIMS information; and ensures security and privacy of student records maintained in the SIMS database.

- b. SIMS—a Student Information Management System that is intended to serve the UH as a whole, not only individual campuses. It provides the UH administration with a technically current, online accessible, central repository of system-wide student information needed for planning, policy making, and decision support. At designated key points in the semester, each campus will upload a "snapshot" of their student database to the central repository for system-wide consolidation, reporting and management information. Since SIMS contains only the latest "snapshots" sent by campuses, it is not intended to service the daily operational needs of individual campuses or to replace existing campus-based student registration systems.
- c. SIMS Data Administration—An executive level functional responsibility, which includes the total management of the University's SIMS data resource.
- d. SIMS Data Administrator—An executive who is responsible for SIMS data administration at the University of Hawai'i and reports directly to the President. The Vice President for Planning and Policy, or a designated representative, serves as the SIMS Data Administrator.
- e. Access Capability—Authority granted to an individual which allows viewing of data residing in a computer system file. Access capability is generally managed through assignment of a user ID and password.
- f. User ID—A character string which identifies an individual to a computer system and enables access.

- g. Read Only Access—Users who are able to view, but not update, information in the SIMS database.
- h. Family Educational Rights and Privacy Act(FERPA) – Federal rules and regulations that set out requirements for protection of the privacy of parents and students under section 438 of the General Education Provisions Act, as amended. It affords students certain rights with respect to their educational records.

5. Security Administration

The SIMS Data Administrator, or designee, is responsible for the data residing in SIMS. The responsibilities of the SIMS Data Administrator are to:

- a. ensure proper operating controls to maintain a secure processing environment;
- b. ensure accuracy and quality of data;
- c. approve all requests for access; and
- d. ensure that system issues impacting the quality of data are reported and adequately resolved.

6. Computing Security Procedures

- a. SIMS Database Security.

Information Technology Services (ITS) will be responsible for the security of the SIMS database and will provide appropriate security measures to control access to the SIMS database.

- b. Establishing Backup and Recovery Procedures.

SIMS backup and recovery procedures should be part of the ITS overall backup and recovery procedures

for administrative computing systems and databases.

c. Protecting and Managing Passwords.

Passwords are a critical component to any computer security program. To properly control passwords and maintain their integrity, the guidelines below are established.

- (1) Users should never give out or share their personal passwords with anyone.
- (2) Passwords will automatically expire at least once a year.

d. Employee Turnover.

When an employee who is an authorized user of SIMS changes assignments or terminates employment with a unit or the University, the guidelines below are followed.

- (1) The employee or employee's supervisor immediately notifies the SIMS Data Administrator of termination so appropriate actions can be initiated to change or terminate access to SIMS and any associated files. This standard practice serves to protect the employee and the University in the event of problems arising from subsequent unauthorized access.
- (2) Reemployment and reinstatement of authorized access will require submitting a new request for access (see item #7) and, upon approval, establishing a new user ID.

7. Requests For Access

- a. **UH Faculty/Staff:** Complete and submit the **SIMS Request for Access Form** (Attachment 1) and **SIMS Security/Non-Disclosure Agreement** (Attachment 2) to the SIMS Data Administrator. Database access will be restricted to **read only**.

- b. **Students:** Personally identifiable information from student educational records maintained in SIMS is restricted to read only and may be accessed by University students conducting research in fulfillment of academic requirements provided all the following conditions are met.
- (1) The student researcher is a classified student who has acquired basic research and statistical skills as an upper-division baccalaureate or graduate student.
  - (2) The student researcher has obtained the approval of the dean of his or her school or college based on submission to the dean of the following information: (Attachment 3)
    - (a) A description of the research project including certification by the supervising faculty member that the research topic is of legitimate educational interest or value to the University and that the research design meets academic requirements;
    - (b) The specific data needed;
    - (c) A statement of the method to be used in protecting the confidentiality of personally identifiable information;
    - (d) A statement of how the results of the research will be used and by whom;
    - (e) The period of time for which access is requested;
    - (f) A signed statement by the supervising faculty member accepting responsibility for the supervision of the student researcher for the use and protection of any personally identifiable data and for

the appropriate dissemination of the results; and

- (g) Two copies of the **SIMS Access Request Form** and **Security/Non-Disclosure Agreement**, one completed and signed by the student and the other completed and signed by the supervising faculty member.
- c. All requests for access must be authorized by the applicable Dean, Director, Provost, Chancellor or Vice President and submitted to the SIMS Data Administrator for action.
- d. The SIMS Data Administrator, or designee, receives all requests for access and may consult and coordinate with campus data custodians prior to approving/disapproving access or determining the specific data access privileges, such as which campus, files, and data elements.
- e. If approved, the SIMS Data Administrator, or designee, will complete and submit the **Administrative Systems Sign On Request Form** (Attachment 4) to the Office of Information Technology Services for implementation.

## 8. User Responsibilities

- a. Users are responsible for safeguarding their identification (ID) codes and passwords, and for using them for the period of time allowed and for stated purposes only. Each authorized user is responsible for all transactions made under the authorization of his or her ID, and for all network activity originating from his or her data jack.
- b. Users are responsible for determining what data are appropriate for distribution, the audience for distribution, and the methods and timing of distribution. In all cases, the provisions of FERPA apply.

- c. Every user shall ensure compliance with any regulatory requirement or UH policy and provide necessary assurances that the provisions of FERPA are observed. Requirements relating to the maintenance of FERPA are contained in 34 C.R.F., section 99.1-99.67; Chapter 20-20, Hawai'i Administrative Rules; and University of Hawai'i Administrative Procedure A7.022. Failure to abide by these provisions will, at a minimum, result in termination of access and denial of further access to the SIMS database.
  
- d. Users will not engage in the following activities. Information and/or evidence to the contrary will, at a minimum, result in termination of access and denial of further access to the SIMS database:
  - (1) Disrupt or interfere with the access or administration of SIMS.
  - (2) Use SIMS for commercial or profit-making purposes without written authorization from the University.
  - (3) Allow access to SIMS by unauthorized users.
  - (4) Use SIMS for illegal activities. Criminal and illegal use may include threats, harassment, theft, and unauthorized access.

9. Enforcement

- a. Suspected or known violations of any provision of the administrative procedure should be reported immediately to the computing unit of the respective UH campus, the SIMS Data Administrator and the applicable Dean, Director, Provost, Chancellor or Vice President who authorized access to SIMS. All actions necessary to secure the SIMS database will be taken.
  
- b. Violations will result in: suspension or revocation of current and future access privileges and associated computer resources; faculty, staff or student disciplinary action; and/or legal action.

**UNIVERSITY OF HAWAI'I  
Student Information Management System (SIMS)  
Access Request Form**

I. Requestor			
Name of User (Last, First) <input type="checkbox"/> Permanent <input type="checkbox"/> Temporary <input type="checkbox"/> Student		SSN	Date
Campus	Department/Office	Position	
Campus Address		Electronic Mail Address	Campus Phone
Existing administrative user of mainframe computer on Manoa Campus? <input type="checkbox"/> Yes    User ID (RACF) _____ <input type="checkbox"/> No			
Description of Intended Use (include campus, data elements and semester/year needed and duration of project). Attach separate sheet if necessary.			
Authorization: Dean/Director/Provost/Chancellor/Vice President			Date
Name _____ (Print or Type)		Signature _____	
<b>Send Access Request Form, Security/Non-Disclosure Agreement and, if applicable, Student Researcher Form to: Office of the Vice President for Planning and Policy  2444 Dole Street, Bachman 110  Honolulu, Hawaii 96822</b>			
II. For OVPPP Use Only			
Consulted with campus data custodian(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No			
Comments:			
<input type="checkbox"/> Access Approved Duration: Campus(es): File(s): Data Elements:			
<input type="checkbox"/> Access Disapproved Reason:			
SIMS Data Administrator or Designee			Date
Name _____ (Print or Type)		Signature _____	



**UNIVERSITY OF HAWAI'I**  
**Student Information Management System (SIMS)**  
**Security/Non-Disclosure Agreement**

Access to personally identifiable information from student education records maintained as part of the University of Hawai'i's Student Information Management System is subject to the requirements of the Family Education Rights and Privacy Act (codified in 20 U.S.C., section 1232g), as amended; federal regulations as adopted by the U.S. Department of Education to implement this act (codified in 34 C.F.R., section 99.1-99.67), as amended; Chapter 20-20, Hawai'i Administrative Rules, entitled "Protection of Educational Rights and Privacy of Students;" and UH Administrative Procedure A7.022. Information related to student academic performance may be accessed by approved users of the University of Hawai'i's Student Information Management System in accordance with the following stipulations:

1. This information will be used solely for curriculum analysis and educational improvement.
2. Personally identifiable information may not be re-disclosed to any other person except authorized education officials with a legitimate educational interest. (See UH Administrative Procedure A7.022 for the definition of *authorized education officials*.)
3. The mention of any personally identifiable information in all written reports, proceedings, memoranda, and minutes is prohibited.
4. Personally identifiable information contained in printed form shall be stored in a secure location.
5. When personally identifiable information is no longer needed, it shall be destroyed in a manner that is consistent with the confidential nature of its content.
6. Each user is responsible for maintaining the integrity and security of his or her individually assigned account, ID/password, or other user identifier. Such individually assigned identifiers shall not be communicated by any means to any other person and should be deleted upon termination of employment with the University of Hawai'i or completion of time-specific research projects.

**I agree to the above stipulations and understand that any unauthorized disclosure of student information may subject me to legal action and University of Hawai'i sanctions including immediate termination of access and denial of future access.**

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

**UNIVERSITY OF HAWAI'I  
Student Information Management System (SIMS)  
Student Research Form**

I. Student Researcher		
Name of Student (Last, First)	SSN	Date
Description of Research Project (attach separate sheet if necessary)		
Specific Data Needed (include campus, semester/year, data elements, cohort)		
Method Used to Protect Confidentiality of Personally Identifiable Information		
How Results of Research Will Be Used and by Whom		
II. Supervising Faculty Member		
Name (Print or Type)	Campus	
College	Department	
<p>As the supervising faculty member, I certify that: the student researcher is a classified student who has acquired basic research and statistical skills as an upper-division baccalaureate or graduate student; the research topic is of legitimate educational interest or value to the University of Hawai'i; and the research design meets academic requirements. Furthermore, I accept responsibility for the supervision of the student researcher, for the use and protection of any personally identifiable data, and for the appropriate dissemination of the results.</p> <p>Signature _____ Date _____</p>		
III. Dean		
<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved		Date
Name _____ Signature _____ (Print or Type)		
<b>Attach two copies of the <i>Access Request Form</i> and the <i>Security/Non-Disclosure Agreement</i> one completed and signed by the student and the other completed and signed by the supervising faculty member and send to: Office of the Vice President of Planning and Policy, 2444 Dole Street, Bachman 110, Honolulu, HI 96822.</b>		

<b>ADMINISTRATIVE SYSTEMS SIGN ON REQUEST FORM</b>		
<b>I. TO MIS APPLICATION MANAGER</b>		
01. Name of System Coordinator  a. Print _____  b. Signature _____	02. Date  a. Current Date _____  b. Effective Date _____	
03. Name of User (Last, First) <input type="checkbox"/> Regular <input type="checkbox"/> Student/Casual <input type="checkbox"/> Other	04. SSN	
05. Department		
06. Campus Address (if non-regular employee)		
07. Existing Administrative User?  <input type="checkbox"/> Yes <input type="checkbox"/> No User ID (RACF) _____	08. Is Employee Terminating From the UH?	
09. Action (check desired action)		
<input type="checkbox"/> Add Activities                      See Back of Form		
<input type="checkbox"/> Delete Activities                      See Back of Form		
<input type="checkbox"/> Change Name	Old Name	Check if Want New User ID Created <input type="checkbox"/>
<input type="checkbox"/> Change Department/Address	New Department/Address (if non-regular employee)	
<input type="checkbox"/> Correct SSN	SSN	
<b>II. For MIS Use Only</b>		
RACF User ID	Initial/Date	Natural Group
Created	<div style="border-bottom: 1px solid black; display: flex; justify-content: space-between; width: 100%;"> <span> </span> <span> </span> <span> </span> <span> </span> </div>	RACF Group
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RACF Password	Comments	

## UH ADMINISTRATIVE SYSTEMS LIST

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**For Fiscal Transaction Update**

Batch From	Range To	Enc (01)	Paymt (02)	Treas Dep (03)	JV/AR (04)	Allot LV4 (05)	Allot LV5/6 (06)
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