

Gramm-Leach- Bliley Act (GLBA) Awareness

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Bursar Operations

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What is GLBA?

- Gramm-Leach-Bliley Act (1999)
- Federal law implemented by Federal Trade Commission applicable to “financial institutions”
- Recipient of Title IV Federal Student Aid (FSA)
- Ensures the security and confidentiality of non-public personal information of customers
- Two components:
 - I. Privacy Rule – satisfied by compliance with Family Educational Rights to Privacy Act (FERPA)
 - II. Safeguards Rule

Safeguards Rule

- Designate employees to coordinate information security program
- Inventory of people, processes, and technologies that store, transmit, or process GLBA-related data and/or personally identifiable information
- Monitor and maintain a safeguards program
- Identify and assess risks to “customer” information
- Monitor mandatory annual employee training
- Maintain an Incident Response Plan

Ongoing GLBA Activities

- Risk assessment planning
- Continuing documentation of data elements and GLBA scope
- Monitor focus areas within GLBA scope
 - I. Financial Aid
 - II. Bursar Operations
 - III. ITS
- Mandatory annual GLBA training
 - I. TIS Access > Student Financials
 - II. FAD Access > Financial Aid

Red Flags Program

- Red Flags
 - I. Situations where sensitive information is requested
 - II. Applicable where identification cannot not be easily established (phone, email, etc.)
- Red Flags Program
 - I. Inventory of sensitive information
 - II. Process for establishing identity
 - III. Rules governing when not to divulge information or do so securely
 - IV. Written policy of the above

GLBA Resources

LSU A&M GLBA Webpage

<https://lsu.edu/administration/ofa/oas/bur/glba/glbainfo.php>

LSU A&M GLBA Committee Charter

https://lsu.edu/administration/ofa/oas/bur/glba/lsu_glba_committee_charter.pdf

LSU A&M GLBA Information Security Policy

https://www.lsu.edu/administration/ofa/oas/bur/glba/lsu_glba_information_security_program.pdf

LSU A&M and University System IT Policies

<https://www.lsu.edu/its/units/it-security/it-policies.php>

Code of Federal Regulations Requirements for a GLBA ISP

<https://www.ecfr.gov/current/title-16/chapter-I/subchapter-C/part-314/section-314.4>

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