

Data Sharing Protocols

Wabash College will protect the privacy of its students, faculty, and staff, and will not share personal data (aside from basic directory information) with external sources except in certain circumstances as described below. These protocols are in addition to Wabash's strict adherence to the Family Educational Rights and Privacy Act (FERPA) and the Health Insurance Portability and Accountability Act (HIPAA).

Internal use of personal data is limited to legitimate College purposes as a requirement of a person's job responsibilities and on a need-to-know basis. Employees granted access to personal data, including student employees working in College offices, must maintain confidentiality and compliance with federal privacy laws and College policies.

Sharing data externally is granted only

- when requested by the student or employee, or
- when required by law enforcement with a court-ordered warrant or subpoena, or
- as part of a state or federal study, audit, or evaluation, or
- as required to share with federal agencies for financial aid, tax, grant, and immigration administration, or
- for a contracted third-party that performs an institutional service or function under the direction of the College and in compliance with Wabash policies.

All requests for personal data will be reviewed for compliance with FERPA and/or HIPAA by the Dean of the College, Registrar, Director of Institutional Research, Dean for Enrollment Management, Chief Human Resources Officer, Dean of Students, or Director of Safety and Security ("Officials"). These individuals will verify the appropriateness and legality of all requests and will coordinate confidential communications with specific campus departments if approved.

Requests for personal data from law enforcement must be issued in writing with current legal documentation before review by College Officials to ensure accuracy and validity. Only then will Officials release information specific to the request if appropriate legal documentation is confirmed to be valid. Should law enforcement agencies request information, please direct them to Director of Safety and Security Buck Waddell (waddelle@wabash.edu or 765-401-1761), whose office is in the Bill and Ginny Hays House at 413 Crawford Street.

Wabash Officials will maintain a detailed record of all data-sharing requests and disclosures.

W.

