

Henry Ford Community College (HFCC) Privacy Practices

HFCC Privacy Practices apply to employees and students and satisfy the following government laws, acts, and guidelines:

- Carl D. Perkins Vocational and Technical Education Act - Source: Section 113 and the Workforce Investment Act of 1998, Section 122.
- Family Education Rights and Privacy Act (FERPA) of 1974 - Source: Federal Register, Vol. 53, No. 69, April 11, 1988.
- Health Insurance Portability and Accountability Act of 1996 (HIPAA)
- Michigan Social Security Privacy Act – Source: Michigan Act 454 of 2004.
- Solomon Amendment – Source: Federal law 10 USC Sec. 983.
- Freedom of Information Act (FOIA), 5 U.S.C. 552
- Bullard-Plawecki Employee Right To Know Act 397 of 1978

Henry Ford Community College holds the privacy of its staff and students of paramount importance. The College's goal is to provide its members with the highest level of service, confidentiality, and security.

HFCC Privacy Practices cover all personally identifiable information collected and stored by the College.

Privacy Practices for Any Media

Access to Student Educational Records

Pursuant to the Family Educational Rights and Privacy Act of 1974 (FERPA), as amended, any person who is or has been in attendance at Henry Ford Community College shall have the right to inspect and review any and all educational records directly related to that person after a request for access to such records has been made in accordance with the approved College procedure for such access. Requests to review general College educational records are to be made at the Admissions, Registration, and Records Office. Requests for information regarding records maintained by a department should be made to the departmental director.

Specifically, the student has the right to:

1. Inspect all of his or her education records maintained by Henry Ford Community College;
2. Prevent the disclosure of personally identifiable information to third parties unless exempted by the Act;
3. Request an amendment to any educational record;
4. Request a hearing to present evidence that a record should be amended;

5. File a complaint with the FERPA Office, Department of Education, 400 Maryland Avenue S.W., Washington, D.C. 20202, regarding Henry Ford Community College failing to comply;
6. Obtain from the Admissions, Registration, and Records Office a copy of the Henry Ford Community College policy regarding FERPA.

Educational records are those records that are directly related to a student and maintained by an education agency or by a party acting for the agency or institution. The term does not include records of instructional, supervisory, and administrative personnel and educational personnel ancillary to those persons that are kept in the sole possession of the maker of the record, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record.

Access to Employee or Student Financial Records

Financial records includes: historical, current or future income, debt, assets, banking, payment, funding requests or related information of an employee or student. The access of such information is limited to appropriate governmental, financial aid, financial services, human resource and/or direct supervisory personnel.

- All financial information and documents will be kept in a secure environment.
- Employees with access to such information will be held to the highest degree of confidentiality.
- Documents that are no longer being used will be shredded or otherwise destroyed prior to disposal.
- No employee, student or other individual is allowed to access or use financial records without written consent from the affected individual or through expressed consent of the institution based on that individual's job responsibilities.
- The College will not keep permanent record of credit card information.

Access to Employee Records

Personnel Files (Operations, Policy 3000)

Henry Ford Community College complies with the Bullard-Plawecki Employee Right to Know Act 397 of 1978. www.legislature.mi.gov/documents/mcl/pdf/mcl-Act-397-of-1978.pdf

It is necessary for the orderly operation of the College to prepare a personnel information system for the retention of appropriate papers bearing upon an employee's duties and responsibilities to the College and College's responsibilities to the employee.

The Board of Trustees requires that sufficient records exist to ensure an employee's qualifications for the job held, compliance with federal, state, and local benefit programs, conformance with College rules, and evidence of completed evaluation. Such records will be kept in compliance with laws of the State of Michigan.

The Board delegates the maintenance of an employee personnel information system to the Director of Human Resources.

A single central file shall be maintained, and subsidiary records shall be maintained for ease in data gathering only. These records shall be maintained or destroyed consistent with the federal and state laws.

A copying cost may be charged for each copy given to the employee upon his/her written request at the rate determined by the President.

In accordance with Michigan law, the employee shall have access to his/her file upon request.

Personnel records shall not be available to Board members except as necessary to conduct disciplinary hearings and shall be available to school administrators as may be required in the performance of their job.

Personnel wishing to review their own records shall:

- A. Request access in writing;
- B. Review the record in the presence of the administrator designated to maintain said records or designee;
- C. Make no alteration or addition to the record nor remove any material there from.

Health Insurance Portability and Accountability Act of 1996 (HIPAA)

Dearborn Schools/Henry Ford Community College (the District) sponsors a group health plan (the Plan). Members of the District's workforce may have access to the individually identifiable health information of Plan participants (1) on behalf of the Plan itself; or (2) on behalf of the District, for administrative functions of the Plan.

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations restrict the District's ability to use and disclose protected health information (PHI).

Protected Health Information. Protected health information means information that is created or received by the Plan and relates to the past, present, or future physical or mental health or condition of a participant; the provision of health care to a participant; or the past, present, or future payment for the provision of health care to a participant; and that identifies the participant or for which there is a reasonable basis to believe the information can be used to identify the participant. Protected health information includes information of persons living or deceased.

It is the District's policy to comply fully with HIPAA's requirements. To that end, all members of the District's workforce who have access to PHI must comply with this Privacy Policy. For purposes of this Policy, the District's workforce includes individuals who would be considered part of the workforce under HIPAA such as employees, volunteers, trainees, and other persons whose work performance is under the direct control of the District, whether or not they are paid by the District. The term "employee" includes all of these types of workers.

No third party rights (including but not limited to rights of Plan participants, beneficiaries, covered dependents, or business associates) are intended to be created by this Policy. The District reserves the right to amend or change this Policy at any time (and even retroactively) without notice. To the extent this Policy establishes requirements and obligations above and beyond those required by HIPAA; the Policy shall be aspirational and shall not be binding upon the District. This Policy does not address requirements under other federal laws or under state laws.

The complete policy is available at the HFCC Human Resources Office.

Personal Information

All requests for information by HFCC are made with the goal of providing better service or in complying with governmentally regulated requests.

HFCC will not give or sell any personal information to any outside agency or company for any use outside of official College business, with the exception of Solomon Act requests (see below), and such use will not be in violation of other provisions of this policy.

HFCC internal practices help protect privacy by limiting employee access to personal information.

Beginning May 2002 the College began keeping the most recently supplied email address as part of student and employee personal files. It is used like a postal address and is maintained to accommodate student requests to keep them informed of pertinent information via email.

Social Security Number Privacy

Students applying and registering for credit courses and employees applying to work at the College are required to supply their social security numbers. International students are required to supply the College with their International Student Identification (ISIN) or comparable unique identification number issued by the U.S.

Uses include, but are not limited to:

- Employee (includes student employees and vendors) tax reporting
- Benefits provision
- Student Federal Financial Aid
- Specific reporting functions as required by the State and Federal government.
- Veteran's certification
- GED testing
- Reporting to the National Student Clearinghouse used for attendance verifications, degree reporting, and loan tracking
- Debt Collectors attempting to collect funding owed the College only.

HFCC, to the extent practicable, ensures the confidentiality of social security numbers and limits that accesses information or documents containing social security numbers.

Only employees with a "need to know" shall have access to student and employee social security numbers. Employees involved include but are not limited to members of Human Resources, Admissions, Financial Aid, Financial Services, Institutional Assessment and Registration.

HFCC does not print social security numbers anywhere except when required by regulations or by necessity for or use by a need to know person as identified above.

All students and employees are issued a unique HFCC (HANK) ID number which limits the need to use social security numbers to identify students or employees. Students and employees may voluntarily identify themselves by their social security number, however. HFCC prefers the use of the HANK ID number.

Should any document containing a social security number need to be disposed of, the document will be shredded or otherwise destroyed prior to disposal.

HFCC prohibits the unlawful disclosure of social security numbers, and any employee found to have violated this rule will be subject to discipline up to and including discharge.

Perkins Act

In order to improve the instruction offered at HFCC and to meet the requirements of the Carl D. Perkins Vocational and Technical Education Act, Section 113 and the Workforce Investment Act of 1998, Section 122, HFCC will use student social security numbers in order to compile summary reports. In no event, will your personal information ever be released.

Section 113 of the Carl D. Perkins and Technical Education Act, 20 USC 2323, and section 122 of the Workforce Investment Act of 1998, 29 USC 2842, requires HFCC and the State of Michigan to assess the effectiveness of vocational and technical education programs aimed at training, placement and retention of student in employment. Although these laws require that performance reports be compiled base on wage record information, neither law requires students to give their social security numbers to the College.

HFCC plans to use student social security numbers in order to gain access to individual wage record and compile required WIA and Perkins Act reports. These reports will assist the College to improve vocational and technical education programs. By improving programs, the College will be better able to serve both employers and employees. Student wage record information is confidentially maintained, based on social security number, by the State of Michigan.

Neither the College nor the State of Michigan will disclose student SSN or wage record data to any unauthorized person or entity unless legally permitted to do so. Any personally identifying wage record data will be destroyed by the College as soon as all required statistical analyses has been performed, or when the information is no longer needed, which ever date comes first.

Solomon Amendment

The Solomon Amendment is part of Federal law that requires public education institutions to release student names and addresses to the United States military upon request. HFCC responds to these requests under punishment of lost of student federal financial aid.

HFCC Online Student and Employee systems

My HFCC WebAdvisor and Online Forms

When using My HFCC WebAdvisor or filling out online forms at HFCC, you will be asked to provide personal information such as name, address, telephone number, HANK ID Number, etc. Each WebAdvisor function and online form has different mandatory fields. These mandatory fields are the minimum information needed to complete a transaction. If you are uncomfortable providing any of this information over the Internet, the College understands. Alternative methods of service, such as touch tone registration and on campus help, are available.

HFCC's Secure Internet Site

My HFCC WebAdvisor and all online forms are designed to give students and employees control over the privacy of their information. HFCC offers the industry standard security measures available through Internet browsers called Secure Sockets Layer (SSL) encryption.

For positive identification, My HFCC WebAdvisor and all online forms web site are registered with site identification authorities to enable Internet browsers to confirm the HFCC Web Server's identity before any transmission is sent. With this technology, the identity of the HFCC site is automatically confirmed behind the scenes prior to the transmission of any form. In addition, if data does not properly reach HFCC, the Internet browser will notify the sender (prior to sending any personal information) that the potential receiving site looks suspicious and should be avoided.

Date encryption is available for security enabled Internet browsers (e.g. Netscape Navigator 2.0 or greater or Microsoft Internet Explorer 2.1 or greater), the information you send us is encrypted, making it extremely difficult to read even if it is wrongly intercepted.

Cookies

At one time HFCC chose to use cookies to track usage of our web site, in order to improve our services. Due to the misuse of cookies by some Internet sites, HFCC has chosen to discontinue this practice. If you find any page on HFCC's web site offering you a cookie, please [let us know](#) at abuse@hfcc.net.