



Worcester Polytechnic Institute

**Personal Identification  
Information  
Policy**

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## Purpose and Scope

Personal Identification Information captured and maintained at Worcester Polytechnic Institute (WPI) should be considered protected data and thorough research needs to be done, before this data is altered by any individual employed by the institution. If handled inappropriately, changes to personal information can have serious negative impact for the individuals as well as for the institution. It is important to maintain the integrity of the data stored in WPI systems as well as for information that is passed back and forth through third-party systems such as SEVIS.

The purpose of this Personal Identification Information Policy is to ensure the security, confidentiality and appropriate use of all personal identification information which is processed, stored, maintained, or transmitted on WPI computer systems and networks. This includes protection from unauthorized modification, destruction, or disclosure, whether intentional or accidental. By law and WPI policy, certain data is confidential and may not be released without proper authorization. This policy is intended to serve as a general procedure on the topic and may be supplemented by other specific policies and regulations such as the Massachusetts Privacy Law, the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA), the Gramm Leach Bliley Act, and other federal or state regulations pertaining to the protection of information.

The Personal Identification Information Policy applies to members of the WPI community who have access to update personal identification information in Banner or external systems.

## Definitions

**Data** – A set of information used in a business process.

**Maintenance access** – Access that enables the user to both view and update data. This access is limited to users directly responsible for the collection and maintenance of data.

**Module** – A collection of objects that support a business process.

**Objects** – Data that is organized in a logical fashion such as databases or database tables/views, file systems and directories, reports and forms

**Personal Information** – Information about an individual including, legal name, nickname, alternative identification, addresses, email addresses, telephone numbers, social security number, gender, citizenship, race and ethnicity, confidential indicator

**Query access** – Access enabling the user to view but not update data.

**System** – A collection of modules. Systems at WPI include but are not limited to: Banner modules including Human Resources, Finance, Student, Financial Aid, Accounts Receivable, Alumni and Development, Operational Data Stores (ODS), Enterprise Data Warehouses (EDW), Luminis, fsaAtlas, and any other related or third-party interfaces to these systems.

## Data Administration

Individuals must adhere to any applicable federal and state laws as well as WPI policies and procedures concerning storage, retention, use, release, and destruction of data.

All WPI data, whether maintained in the central database or captured by other data systems, including personal computers or other storage devices, remains the property of WPI and is covered by all WPI data policies. Access to and use of data should be approved only for legitimate WPI business. Data (regardless of how collected or maintained) will only be shared among those employees who have demonstrated a job related need to know.

## Maintenance Access to Personal Information

Below are the requirements and limitations for all WPI divisions/departments to follow in making changes to personal information owned by WPI.

- All individuals with maintenance access to personal identification information must adhere to the following requirements prior to making any changes to data.
- All individuals with maintenance access to personal identification information must be trained to properly research any change request received.
- All individuals must thoroughly research the individual for whom the change is being made to determine if the individual is:
  - A current staff or faculty member
  - A currently enrolled student (undergraduate, graduate or CPE)
  - A current admissions applicant or recruit
  - Domestic or International
- If it is found that any of the above apply to the individual, the change request must be forwarded to the responsible department listed below (if not the researching department) following the designated hierarchy:
  1. All International students, alumni ,staff and faculty – International House
  2. Currently employed **non-student and** non-international staff and faculty – Human Resources
    - All non-international student employees should be referred to the Registrar’s Office for updates.
  3. Currently non-international students enrolled in **undergraduate, graduate and CPE** credit-based coursework – Registrar’s Office
  4. Current Undergraduate Admissions applicants and Recruits – Undergraduate Admissions
  5. Current Graduate Admissions applicants and recruits – Graduate Admissions
  6. Currently non-international students enrolled in non-credit/CEU based coursework – Corporate and Professional Education and Summer Office.
  7. If it is found that the individual is not currently employed by or enrolled at WPI and is not found to be international, the designated change should be forwarded to the Development Services.

**Individuals making changes to personal information should document the changes made, the source of the information change request and to confirm data with the affected individual prior to making changes of surname, marital status or gender if the affected individual is not the source of the information to be changed. If the above changes with the addition of the confidentiality flag and the legal address are made to the record of current admissions applicants (undergraduate and graduate), students, employees and non-credit seminar attendees a confirmation of the changes made should be sent to the affected individual.**

## Contact for Personal Information Updates

<b>International:</b>	<b>Director of International Students and Scholars</b>
<b>Human Resources:</b>	<b>HR Generalist/HRIS Analyst</b>
<b>UG Admissions:</b>	<b>Coordinator of Admissions Communications</b>
<b>Student (Registrar's Office):</b>	<b>Record Keeping Assistant</b>
<b>Graduate Admissions:</b>	<b>Assistant Director, Operations</b>
<b>Academic and Corporate Development</b>	<b>Manager</b>
<b>Recreation Center</b>	<b>Associate Athletic Director</b>
<b>Advancement and Alumni Relations:</b>	<b>Manager of Development Services Operations</b>

## Regulatory and Policy Standards

Please refer to the document listed below:

WPI Name and Address Standards Guidelines

<https://home.sharepoint.wpi.edu/offices/UDC/Shared%20Documents/Data%20Stewardship%20Work%20Group/Address%20Standards%20Sub-Group/WPI%20BannerDataStandards%20-%20Final.docx>