

## GLBA Safeguards Rule Compliance Questionnaire

### Purpose

As required by the GLBA Safeguards Rule ([16 CFR 314](#)), the University is responsible for developing and maintaining an Information Security Program (ISP) to identify and control risks to the security of customer information as defined in the ISP. This questionnaire should be completed by directors of colleges/administrative units and is designed to provide the ISP Coordinator or designee and Qualified Individual with sufficient information to determine whether areas have identified risks to customer information and have processes in place to protect such information. Please return the completed questionnaire to the Compliance Office for Finance & Administration.

College/Administrative Unit Name \_\_\_\_\_

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

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

No.	Description	Yes	No
1.	Does your college/administrative unit obtain, possess, or maintain customer information as defined in the ISP? If "Yes," go to #2; if "No," go to #8.	<input type="checkbox"/>	<input type="checkbox"/>
2.	Has your college/administrative unit identified and assessed the risks to protecting such information? If "Yes," go to #3; if "No," go to #6.	<input type="checkbox"/>	<input type="checkbox"/>
3.	Has your college/administrative unit developed or begun to develop safeguards designed to protect customer information? If "Yes" or "No", go to #4	<input type="checkbox"/>	<input type="checkbox"/>
4.	Have employees been informed of the ISP and their responsibilities for safeguarding customer information? If "Yes," go to #5; if "No," go to #6	<input type="checkbox"/>	<input type="checkbox"/>
5.	Have employees been trained on how to properly safeguard customer information? If "Yes" or "No", go to #6	<input type="checkbox"/>	<input type="checkbox"/>
6.	Would you like assistance on identifying and/or assessing risks to customer information from the Compliance Office for Finance & Administration? If "Yes" or "No", go to #7	<input type="checkbox"/>	<input type="checkbox"/>
7.	Are there methods, processes, or controls in place to monitor the effectiveness and/or efficiency of the safeguards designed to protect customer information? If "Yes" or "No", go to #8	<input type="checkbox"/>	<input type="checkbox"/>
8.	Does your college/administrative unit contract with a third-party service provider(s) who has access to or has been entrusted to obtain or service accounts with customer information as defined in the ISP? If "Yes," go to #9; if "No," you are done	<input type="checkbox"/>	<input type="checkbox"/>

No.	Description	Yes	No
9.	Is the service provider(s) contractually obligated to safeguard customer information to which it has access? If "Yes," you are done; if "No," go to #10	<input type="checkbox"/>	<input type="checkbox"/>
10.	Has your college/administrative unit contacted the Office of the General Counsel for guidance on compliance with the Safeguards Rule?	<input type="checkbox"/>	<input type="checkbox"/>

11. If applicable, provide examples of risks to customer information in your college/administrative unit

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12. If applicable, please provide examples of administrative, technical, and physical safeguards in your college/administrative unit designed to protect customer information (see examples below).

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Administrative Safeguard: Employees who will be accessing customer information are required to sign an agreement (or agree upon use) to follow the institution's confidentiality and security standards for customer information.

Technical Safeguard: Employee access to screens with customer information is limited to that needed to perform the employee's job duties.

Physical Safeguard: Paper records or files with customer information are locked in a file cabinet or drawer when unattended.

Please provide any comments related to compliance with the GLBA Safeguards Rule for your college/administrative unit.

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Thank you for this valuable information. Please contact the Compliance Office for Finance & Administration for assistance in completing this questionnaire.