In light of the Gen-15-18 and Gen-16-12 Dear Colleague letters regarding protecting student information and to comply with the requirements of those letters, Pomona College is adopting the NIST 800-171 standards. All IT policies will have clear references, or crosswalks, to the NIST 800-171 standards, and security audits will be conducted following the requirements as specified in the NIST 800-171 standards.

The Gen-15-18 and Gen-16-12 Dear Colleague letters apply to all student information and require institutions that obtain Federal Student Aid (FSA) must certify as being compliant with the Gramm-Leach-Bliley Act (GLBA). The further recommendation found within the letters is to apply NIST 800-171 standards, the application of which would guarantee compliance with the GLBA, and thus the FSA requirements. To that end, all information systems and users of those systems at Pomona College must implement the NIST 800-171 standards so that all departments of the College have implemented a consistent level of security.

Adopted by the Data Governance Committee
March 9, 2017