

ACH DATA SECURITY

Centennial BOCES is committed to protecting the confidentiality and integrity of information obtained, created and/or maintained by Centennial BOCES that is considered "protected information" by the rules of the National Automated Clearinghouse Association (NACHA). "Protected Information" includes confidential information maintained as a result of the employer-employee relationship, such as employee home addresses, telephone numbers, social security numbers, and financial information, including bank account numbers, bank routing numbers, and the types and amounts of automated clearinghouse (ACH) transactions.

Centennial BOCES shall ensure appropriate controls are in place across all ACH systems, applications and processes used by Centennial BOCES. Centennial BOCES shall identify critical or confidential data used in its ACH operations and ensure that Protected Information is properly stored and disposed of, as follows:

- ACH files containing Protected Information shall be secured in a password protected file. These files shall be appropriately deleted when no longer needed, unless such file is otherwise required to be retained by applicable law.
- Protected Information in paper form shall be secured in a locked cabinet inside a locked room and appropriately destroyed when no longer needed, unless such documentation is otherwise required to be retained by applicable law.
- Protected Information in electronic form shall only be changed, revised, or deleted by authorized Centennial BOCES employees through password protected software.
- Protected Information shall not be stored on any portable device, such as a USB.

Centennial BOCES shall minimize and monitor the number of Centennial BOCES employees with access to Protected Information and shall also limit employee access to ACH maintenance and transaction support functions. Training shall be provided to appropriate Centennial BOCES employees and the executive director or designee shall be responsible for overseeing and documenting such training.

CROSS REF.: GBJ, Personnel Records and Files

Reviewed: November 16, 2017

Adopted: November 20, 2014