

Applicable to OMB Circular A-130 Appendix III, reviews of SFA’s major applications were performed during the summer of 2000. The Risk Assessment Report dated August 31,2000 noted twelve findings across SFA. Finding number 11 stated that SFA should “Develop a security model that assigns information sensitivity levels and ownership”. Below is a table which shows possible data security levels and federal applicability to that level.

<b>Type</b>	<b>Description</b>	<b>Applicable To</b>
Security Logs	These are the system (host/network/appliance) record of actions performed on the equipment either operational or administrative. Included items should be stated in SFA Model Operational Security Guidelines (does it exist)?	OMB A130 Computer Security Act
Business Logic Data	Information regarding how SFA operates from a business point of view. This may include memorandums of understandings with schools and lenders , operations, and process flow	Proprietary Information
Transactional	Record of transactions performed by an individual or systems against a server such as database, file, web, etc	Federal Records Act
Personal Customer Data	Personal information not publicly available such	Privacy Act
Public Customer Data	Information publicly available from various sources such as address.	
Legal/Grand Jury	After a student defaults are there any legal limitations as to who can get the information	