

## Classification of University Data

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According to University Policy [IT6005: Data Security Policy](#), restricted University data must be protected against physical theft or loss, electronic invasion, or unintentional exposure through a variety of personal and technical means.

In accordance with this policy, when classifying University data, the following criteria for individual data elements, applications or systems must be used. If there is a question about which category data falls under, always assume the highest possible category in classifying the data. Although some of the data listed, or parts of the data listed, may be subject to disclosure under the Open Records Act, that fact shall not change the otherwise applicable classification, and the manner in which we treat the data internally. If you receive an Open Records Act request for the release of data, consult the Office of Legal Counsel before responding to the request.

	<b>Restricted Data</b>	<b>Internal / Limited Access Data</b>	<b>Public Data</b>
<b>Definition</b>	Data protected by federal or state law or regulations, or by contract. Restricted University data includes, but is not limited to, data that is protected by the Family Educational Rights and Privacy Act (FERPA), the Health Insurance Portability and Accountability Act (HIPAA), (PCI-DSS), the Gramm-Leach Bliley Act (GLBA) or Controlled Unclassified Information (CUI) as identified in a law, regulation, or government policy.	Data that would not expose the University to loss if disclosed, but should be protected. Internal/Limited access University data includes, but is not limited to, operational data likely to be distributed across organizational units within the University.	Data available within the University community and to the general public.
<b>Risk</b>	High	Medium	Low
<b>Access</b>	Individuals designated with approved access.	UoM employees and non-employees with a business “need to know”	UoM affiliates and general public with a “need to know”
<b>Examples</b>	<ul style="list-style-type: none"> <li>• Social Security Numbers</li> <li>• Credit Card Numbers</li> <li>• Bank Account Numbers</li> <li>• Driver’s License Numbers</li> </ul>	<ul style="list-style-type: none"> <li>• Information resources with access to restricted data</li> <li>• Research detail or results that are not restricted data</li> </ul>	<ul style="list-style-type: none"> <li>• Campus maps</li> <li>• Directory information (** Note: For those students who restrict their “Directory Data”, even their</li> </ul>

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		<ul style="list-style-type: none"> <li>• Library transactions (e.g., catalog, acquisitions)</li> <li>• Financial transactions which do not include restricted data (e.g., telephone billing)</li> </ul>	<p>“Directory Data” are to be treated in a confidential manner)</p> <ul style="list-style-type: none"> <li>• Student Name</li> <li>• Student U-Number (University ID)</li> <li>• Student Address</li> <li>• Telephone Listing</li> <li>• E-mail address</li> <li>• Major Field of Study</li> <li>• Expected Date of Graduation</li> <li>• Date of Birth</li> <li>• Participation in Officially Recognized Activities and Sports</li> <li>• Weight and Height of Members of Athletic Teams</li> <li>• Dates of Attendance</li> <li>• Degrees, including Date of Graduation</li> <li>• Awards Received</li> <li>• Most Recent Previous Education Agency or Institution Attended by the Student</li> <li>• Student’s Current Enrollment Status (number of enrolled hours, full-time or part-time status)</li> <li>• Student’s Classification (level)</li> <li>• Cumulative earned hours</li> </ul>
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			<ul style="list-style-type: none"><li>• University Student-Employment Status</li></ul>
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## **More Specific Examples of Restricted Data**

Please note that this is not meant to be an exhaustive and is merely to provide examples.

### **Student Information**

All student data in the Student Module and other related systems (e.g., Data Warehouse, Banner Reporting Instance, Banner Student Self-Service, Banner Faculty Self-Service, etc.) are to be treated in a professional manner. Further, all data except “Directory Data” are to be treated in a confidential manner. (\*\* Note: For those students who restrict their “Directory Data”, even their “Directory Data” are to be treated in a confidential manner)

- Grades / Transcripts
- Class lists or enrollment information
- Student Financial Services information
- Athletics or department recruiting information
- Payment History
- Financial Aid / Grant information / Loans
- Student Tuition Bills
- Disability information

### **Donor Information**

- Name
- Address
- Designation of Gift (to what fund was the donation made)
- Amount (what was donated)
- Telephone / Fax numbers
- Email / URLs
- Employment information
- Family information (spouse(s) / children / grandchildren)

### **Research Information**

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- Private funding information
- Human subject information
- Lab animal care information

## General Information

- Confidential legal information

## Employee Information

- Performance Evaluations
- Worker's compensation or disability claims
- Disability information
- Name in association with:
  - Social Security Number
  - Salary or payroll information
  - Bank account number
  - Date of birth
  - Home address or personal contact information
  - Driver's license number
  - Benefits information

## Business Data

- Purchasing card (P-card) numbers
- Privileged contract information

## Management Data

- Detailed annual budget information
- Conflict of Interest Disclosures
- University's investment information
- Non-anonymous course evaluations

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## Library Information

- Library Circulation Transactions

Revision Dates:

Last Reviewed: 2/10/2021