Classification of University Data

According to University Policy UM1691: Campus Data Security, 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.

<table>
<thead>
<tr>
<th></th>
<th>Restricted Data</th>
<th>Internal / Limited Access Data</th>
<th>Public Data</th>
</tr>
</thead>
<tbody>
<tr>
<td>Definition</td>
<td>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), or the Gramm-Leach Bliley Act (GLBA).</td>
<td>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.</td>
<td>Data available within the University community and to the general public.</td>
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<tr>
<td>Risk</td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
</tr>
<tr>
<td>Access</td>
<td>Individuals designated with approved access.</td>
<td>UoM employees and non-employees with a business “need to know”</td>
<td>UoM affiliates and general public with a “need to know”</td>
</tr>
</tbody>
</table>
| Examples         | • Social Security Numbers  
• Credit Card Numbers  
• Bank Account Numbers  
• Driver’s License Numbers | • Information resources with access to restricted data  
• Research detail or results that are not restricted data  
• Library transactions (e.g., catalog, acquisitions)  
• Financial transactions which do not | • Campus maps  
• Directory information (** Note: For those students who restrict their “Directory Data”, even their “Directory Data” are to be treated in a confidential manner)  
• Student Name |
## Classification of University Data

<table>
<thead>
<tr>
<th>Include restricted data (e.g., telephone billing)</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Student U-Number (University ID)</td>
</tr>
<tr>
<td>• Student Address</td>
</tr>
<tr>
<td>• Telephone Listing</td>
</tr>
<tr>
<td>• E-mail</td>
</tr>
<tr>
<td>• Major Field of Study</td>
</tr>
<tr>
<td>• Date of Birth</td>
</tr>
<tr>
<td>• Participation in Officially Recognized Activities and Sports</td>
</tr>
<tr>
<td>• Weight and Height of Members of Athletic Teams</td>
</tr>
<tr>
<td>• Dates of Attendance</td>
</tr>
<tr>
<td>• Degrees and Awards Received</td>
</tr>
<tr>
<td>• Most Recent Previous Education Agency or Institution Attended by the Student</td>
</tr>
<tr>
<td>• Student’s Current Enrollment Status (number of enrolled hours, full-time or part-time status)</td>
</tr>
<tr>
<td>• Student’s Classification (level)</td>
</tr>
<tr>
<td>• Cumulative earned hours</td>
</tr>
<tr>
<td>• Email address</td>
</tr>
</tbody>
</table>
More Specific Examples of Restricted Data

Student Information

All student data in the Student Module and other related systems (e.g., Data Warehouse, Banner Reporting Instance, Spectrum Student Self-Service, Spectrum 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.

- 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

- Private funding information
- Human subject information
- Lab animal care information
Classification of University Data

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

Library Information

- Library Circulation Transactions