

Proposed UH Institutional Data Classification Categories
Draft 10/23/13

Data Category	Definition	Types of Data	Restricted Use?	Level of Risk	Encryption Required?
Restricted <i>(new)</i>	Also referred to as “restricted directory information” for student data. Institutional Data that is used for internal UH business only and will not be distributed to external parties. Institutional Data will be released only under the terms of an established memorandum of agreement or contract.	<ul style="list-style-type: none"> • Student UH email address • Student home address • Student phone number • <i>UH ID number (regardless if for Student or Employee. May also be referred to as: Student UH ID number or Employee UH ID number)</i> • <i>Banner PIDM</i> • <i>ODS PIDM</i> 	Yes	Limited	No
Sensitive	Institutional Data that is subject to privacy considerations or has been classified as confidential and subject to protection from public access or inappropriate disclosure.	<p>Student and employee information:</p> <ul style="list-style-type: none"> • Date of birth • Private home address and phone number • Job applicant records (names, transcripts, etc.) • Confidential salary information • Access codes, passwords, and PINs for online information systems • Answers to “security questions,” such as “what is the name of your favorite pet?” • Confidential information subject to attorney-client privilege • Detailed information about security systems (physical and/or network) • Information made confidential by a collective bargaining agreement <p>Other student record data that is not considered directory or restricted information.</p>	Yes	High	Yes, if not physically secured *

Notes: Student record data that is not listed as either ‘public’ or ‘restricted’ is considered sensitive.
 Aside from student record data, if a particular data description or set of data is not listed in any category, it is considered public.

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Highly Regulated <i>(new)</i>	Institutional Data where inadvertent disclosure or inappropriate access requires a breach notification in accordance with Hawai'i Revised Statutes §487N or is subject to any other federal regulations that may incur financial fines or other sanctions (such as immediate termination of contract/grant or inability to apply for any future contact/grant) if information is breached.	An individual's first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted: <ul style="list-style-type: none"> • Social Security Number • Driver license number or Hawai'i identification card number • Account number, credit or debit card number, access code, or password that would permit access to an individual's financial account • PCI-DSS • Health information, including anything covered by the Health Insurance Portability and Accountability Act (HIPAA) 	Yes	Very high	Yes, if system not hardened in accordance to security specifications in accordance with applicable regulation(s). <i>Technical security requirements may include mandatory security scans for vulnerabilities and personally identifiable information, password audits, etc.</i>

* *Physically Secured: System, electronic media, or paper that contains sensitive information must be physically secured in a non-public, controlled area (room should be locked if no one is in the room, cannot be a freely accessible area such as a classroom or lab area, area is only accessible to a trusted, known group of individuals).*