Classification of University Data

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 it, may be subject to disclosure under the Open Records Act, that fact shall not change the otherwise applicable classification and how 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.

	Restricted Data	Internal / Limited Access Data	Public Data
Definition	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. If this data is exposed to those without a need to know, there could be serious financial and/or legal risk for the University.	Internal/Limited access University data includes operational data likely to be distributed across organizational units within the University. If this data is exposed to those without a need to know, there could be moderate financial and/or legal risk for the University.	If this data is exposed to those without a need to know, there could be limited financial and/or legal risk for the University.
Risk	High	Medium	Low
Access	Individuals designated with approved access.	UoM employees and non-employees with a business "need to know"	UoM affiliates and public with a "need to know"
Examples	• PII data such as Social Security Numbers • Credit Card Numbers • Bank Account Numbers	• Research detail or results that are not restricted data	• Campus maps • Academic catalogs • Schedule of classes

	• Driver's License Numbers See more examples of restricted data in Appendix A.	• Library transactions (e.g., catalog, acquisitions) • Financial transactions which do not include restricted data (e.g., telephone billing) • Student Directory information (** Note: For those students who restrict their "Directory Data", their "Directory Data" are to be treated as Restricted data) • Student Name • Student U-Number (University ID) • Student Address • Telephone Listing • E-mail address • Major Field of Study • Expected Date of Graduation • Date of Birth • Participation in Officially Recognized Activities and Sports • Weight and Height of Members of Athletic Teams • Dates of Attendance • Degrees, including Date of Graduation • Awards Received • Most Recent Previous Education Agency or Institution Attended by the Student • Student's Current Enrollment Status (number of enrolled hours, full-time or part-time status) • Student's Classification (level) • Cumulative earned hours • University Student-Employment Status	• Salaries •

Appendix A: More Specific Examples of Restricted Data

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

Student Information

All student data in university systems are to be treated professionally and should not be shared with someone without a need to know.

- 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
- Student Restricted Directory Data

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

General Information

- Confidential legal information

Employee Information

- Performance Evaluations
- Worker's compensation or disability claims
- Disability information
- Name in association with:
    - Social Security Number
    - 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

Revision Dates:

Last Reviewed: April 2024