ADMINISTRATIVE PROCEDURE

Information Governance: Information Classification

Procedure Contents	
Procedure Contents	**Effective Date:** 22 October 2012
• **Related Policy**	**Last Updated:** 22 October 2012
• **Entities Affected**	**Responsible University Officer:**
• **Procedure Context**	VP Technology/CIO
• **Procedure**	
• **Forms/Instructions**	**Procedure Owner:** J. Kelly Flanagan
	(responsible for developing, implementing, & managing the procedure)
• **Appendices**	
• **Additional Contacts**	
• **FAQ**	**Procedure Contact:** Christine Tolman
• **Related Information**	(First point of contact for procedure users)
• **History**	

RELATED POLICY: Information Security and Appropriate Use Policy

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ENTITIES AFFECTED BY THIS PROCEDURE: Any persons with responsibility for classifying, providing access to, or using university information

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PROCEDURE CONTEXT:

Identification and classification of university information is essential for ensuring that the appropriate degree of protection is applied to university information. This procedure describes how the university classifies information.

PROCEDURE:

Responsibility for Classification:

Information stewards are responsible for classifying the information in their academic or administrative units into one of the three categories defined below. Classifications are to be determined in consultation with appropriate Information Trustees and are then used to govern access and security requirements. In addition, information stewards are responsible for periodically evaluating the classifications assigned and for providing information concerning access or availability of information in their academic or administrative unit.

Information Classifications:

Information is classified into one of the following three categories according to its use, sensitivity, and importance to the university and in compliance with university policy, state and federal regulations, and other obligations regarding privacy and confidentiality of information.

Public—information which may, or must, be available to the general public. It is defined as information with no existing legal or regulatory restrictions on access. (Examples: Course Catalog, directory information)

Confidential—non-public sensitive information whose access must be protected due to proprietary, ethical, or privacy considerations. This classification applies even though there may not be a formal law, regulation, or civil statute requiring this protection. (Examples: Date of Birth, Ethnicity, Donor Contact Information, Contracts**)**
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Restricted—non-public sensitive information protected and/or regulated by statutes, policies, or regulations. It may also represent information for which an Information Trustee has exercised his or her right to restrict access. (Examples: Student Education Records (FERPA), Non-directory Information, Social Security Number, Credit Card Number, Health Insurance Policy ID Number, Driver's License Number)

Considerations when Classifying Information:

Default Classification. All information is considered non-public and classified as **"Confidential"** until classified otherwise.

Aggregated or Combined Data. Some information may have little or no sensitivity in isolation, but may be highly sensitive when combined with other data. For that reason, information stewards may classify aggregated or combined data with a more restrictive classification.

Approvals. All information classifications are subject to final approval by the Information Trustees.

FORMS/INSTRUCTIONS

The key online forms related to this procedure are:

- **Access Request Form**
- **Information Sharing Agreement**

ADDITIONAL CONTACTS

Classification Questions: If you have questions about the **appropriate classification** for any information not specifically mentioned above, please contact your line leader and/or the Office of the General Counsel.

Information Protection Questions: If you have any questions about **appropriate protection** of information, please contact the Information Security Officer.

APPENDICES

- *Examples of Information Classifications*

FREQUENTLY ASKED QUESTIONS

There are no frequently asked questions for this procedure—yet.

RELATED INFORMATION

- ***Access to Student Records Policy***
- ***Access to Student Records Procedure***

- *Institutional Assessment and Analysis; Information/Study Request Policy*
- *Computer and Electronic Communications General Use Policy*

HISTORY

Effective:
22 October 2012

Superseded:
XXXXXXX Procedure