Coppin State University
Information Technology Division
Policies and Procedures

<u>**Policy #:**</u>   **ITD – GEN – 016**   **Version: 02**

<u>**Subject:**</u>   **CSU ITD Data**   **Effective Date: 12/14/2016**
Classification Policy

                                            <u>**Approval Date:**</u>   **04/04/2018**
<u>**Approved by:**</u>

                                            Review Date: **04/04/2018**

I.   Purpose

The purpose of this policy is to provide the basis for protecting the confidentiality of data at Coppin State University. This standard exists in addition to all other university policies and federal and state regulations governing the protection of the university's data. This policy covers all university records, regardless of media form that are made or received in connection with the transaction of university business.

II.   Policy

All data managed by CSU Information Technology Division shall be assigned one of the classifications listed below. Information shall be classified using the most secure classification level of an individual information component when existing within aggregated information. Specific restrictions related to each classification can be found in the Data Use Standard Table (ITD-GEN-016T).

1. **Restricted/Category I**:

    a) Data in any format collected, developed, maintained or managed by or on behalf of the university, or within the scope of university activities.

    b) University data protected specifically by federal or state law or CSU rules and regulations (e.g., FERPA; HIPAA; Sarbanes-Oxley, Gramm-Leach-Bliley; CSU/USM System Policies).

    c) University data that are not otherwise protected by a known civil statute or regulation, but which must be protected due to contractual agreements requiring confidentiality, integrity, or availability considerations (e.g., Non-Disclosure Agreements, Memoranda of Understanding, Service Level Agreements, Granting or Funding Agency Agreements, etc.) Examples

include, but are not limited to social security numbers, credit card numbers, driver licenses, non-directory student records and export controlled technical data.

d) Specific restrictions related to the Restricted/Category I classification can be found in the Data Use Standard Table (ITD-GEN-016T).

2. **Sensitive/Category II:**

a) Data whose loss or unauthorized disclosure would impair the functions of the university, cause significant financial or reputational loss or lead to likely legal liability. Examples include, but are not limited to, research work in progress, financial information, strategy documents and information used to secure the university's physical or information environment.

b) Specific restrictions related to the Sensitive/Category II classification can be found in the Data Use Standard Table (ITD-GEN-016T).

3. **Open/Category III:**

a) Data that does not fall into any of the other information classifications.

b) This data may be made generally available without specific information owner's designee or delegate approval. Examples include, but are not limited to, advertisements, job opening announcements, university catalogs, regulations and policies, faculty publication titles and press releases.

c) Specific restrictions related to the Open/Category III classification can be found in the Data Use Standard Table (ITD-GEN-016T).

III. Procedure

It is Coppin State University policy to provide an appropriate level of access to the electronic (EagleLINKS ERP) data dependent upon role. Access privileges shall be assigned upon hire in accordance with an employee's defined role. Access controls shall be established to ensure access to the systems and information are limited to approved individuals and access limited only to information needed to perform their business roles. Any additional employee access must be requested in writing and approved by the employee's supervisor and the data owner.

VI. Definitions

The following terms apply for the purpose of this policy. Definitions for these terms may be found at https://lookup.coppin.edu/cpd/Pages/home.aspx:

Accountability   *Authentication*

Authorization   *Identification*

Confidentiality   *Integrity*

Data Owner   *Risk*

V. References

- Policy: ITD-GEN-011, CSU IT Security Program
- Policy: ITD-GEN-001, CSU Systems Access Policy
- Form: ITD-GEN-006, CSU Acceptable Use Policy
- Policy: ITD-IS-009, CSU EagleLINKS Data Access Policy
- Table: ITD-GEN-016T, Data Use Standard Table