

UT Health Science Center: GP-002-Data & System Classification	
Version 8	Effective Date: 06/16/2020

Responsible Office: Office of Cybersecurity	Last Review: 05/25/2022 Next Review: 05/25/2024
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Purpose

At UTHSC, protecting our Institutional Information and IT Resources is critical to our mission of teaching, research, clinical care, and public service. This standard is also designed to meet compliance requirements for data regulated by federal or state law. This includes, but is not limited to, security requirements and safeguards for the Family Educational Rights and Privacy Act (FERPA), Health Insurance Portability and Accountability Act (HIPAA), or Gramm-Leach-Bliley Act (GLBA).

This Standard defines requirements for the appropriate classification of Institutional Information and IT Resources to ensure their confidentiality, integrity, and availability. It follows a risk-based approach to prescribe additional controls based on the need to achieve a specific level of protection for each category. UTHSC's investment in security controls is commensurate with the level of need for protection or availability of the Institutional Information

Scope

This policy applies to any form of data, including paper documents and digital data stored on any type of media and the systems or assets used to store, process, or transmit that data. It applies to all UTHSC employees, students, as well as to third-party agents authorized to access UTHSC data.

Definitions

Availability – ensuring timely and reliable access to, and use of, information.

Confidentiality – preserving authorized restrictions on information access and disclosure, including means for protecting personal privacy and proprietary information.

Information Technology (IT) Resources – The collection of data and technology that support the achievement of organizational goals. IT Resources include hardware, software, vendors, users, facilities, data systems, and data.

Integrity – guarding against improper information modification or destruction and includes ensuring information accountability, non-repudiation, and authenticity.

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Security Categorization - The process of determining the security category for data or an information system. Security categorization methodologies are described in Federal Information Processing Standard (FIPS 199) and National Institute for Standards and Technology (NIST) SP 800-60. The security categorization helps identify the appropriate level of controls to be applied to the system or data.

Responsibilities

Data/System/Asset Owner – The owner is usually a senior stakeholder of a University asset/system and is responsible for ensuring that technology functions meet University goals and adhere to University policies and standards. The asset owner is ultimately responsible for ensuring the University security policies are followed and that risks associated with the asset/system are identified and managed to an acceptable level. The owner is ultimately responsible for the data and information being collected and maintained by their department or division. The owner shall address the following:

- **Review and inventory** – Review and inventory IT resources within their areas of responsibility
- **Assignment of data and or system classification labels** – Assign classification based on the system or data type and potential impact level
- **Approval and Review of Access Rights and Permissions** - Ensure that users, groups, and permissions are appropriate and limited to the least amount of privilege needed to perform necessary tasks
- **Risk Management** - Identification and management of risk associated with the data or asset to an acceptable level.

Data/System Custodian - An individual or group within the University that is responsible for the maintenance and operations of the technology asset/system. The asset custodian should know the asset and technical operations very well and be able to advise on the technical impact of a compromised system. The asset custodian coordinates with data owners and system owners to ensure data is properly stored, maintained, and protected. They are responsible for applying required security controls based on the classification, designated in [GP-005-Data Security](#).

Data Users - the person who actually "touches" the information (enter, delete, read, process, etc.). Users are responsible for taking reasonable precautions against

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disclosure of data they have access to. Users should not grant access to data without proper authorizations from the Data Owner.

Campus Units – all units that collect and store data need to document their policies, procedures, and architectures that pertain to use, collection, and/or storage, regardless of the information format (electronic, paper, image, sound, etc.). This documentation should detail account creation and deletion, records retention and destruction, backup retention and destruction, and any other relevant procedures.

Standard

1. Systems/Data need to be classified in each of the areas of Confidentiality (C), Integrity (I), and Availability (A).
2. The process of data and system classification is accomplished by assigning a classification score of 1-3 in the areas of Confidentiality, Integrity, and Availability, with higher scores representing a higher level of sensitivity or criticality. **Public information/data can have a classification level of 0, but all other Information Technology Resources have a minimum classification of 1.** It is acceptable if these are mixed, i.e. Confidentiality 1 (C-1), Integrity 3 (I-3), and Availability 2 (A-2).
3. Each asset will have different levels of security needs and controls based on risk and this classification process allows for the appropriate application of controls. This process follows the NIST recommendations in FIPS 199 by using the high watermark of the classifications in the areas of Confidentiality, Integrity, and Availability. The highest classification in any area will indicate if the system security plan applied is a level 1 (lowest protection level), level 2, or level 3 (highest protection level). This process and examples are illustrated in Appendix A.
4. While selecting classification levels, System/Data Owners should also assign an impact level in the areas of Confidentiality, Integrity, and Availability to quantify the potential impact of an adverse event in each of these areas. This process, along with examples and definitions, is illustrated in Appendix A.
5. Data types should be identified and documented for each type of data that is transmitted, processed, or stored by the system or data set. These data types may have additional statutory requirements that must be assessed regarding security control implementation in addition to the baseline controls outlined in this standard. Data types that may need to be identified and associated with a system or data set are listed in Appendix B.

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6. The classification of data is independent of its format. For example, if personal health information is revealed in a video recording of a lecture, then that video file should be classified as C-3. If paper credit card receipts are stored, then they should be classified as C-3.
7. Questions about classifying or handling the data should be directed to the Data Owner, your supervisor, or the Office of Cybersecurity. The Office of Cybersecurity can assist departmental users in developing appropriate controls and processes to protect data based on the classification rating.
8. Report the misuse or compromise of systems that handle, store, or propagate any classification ranking one or above IMMEDIATELY to the Office of Cybersecurity at itsecurity@uthsc.edu.

Additional considerations:

- Data is scattered everywhere; data is stored, processed, and transmitted across numerous systems, devices, and users. The classification remains with the data and required protections follow that data.
- Context matters: the classification and impact ratings of the system/data depends on factors such as how it used or accessed, who is using it, the volume of data, etc., and not solely on the information alone.
- The Institutional Review Board (IRB) may have additional policies or requirements regarding data associated with IRB approved studies that must be followed based on their compliance procedures.

Appendix A

Classification, Impact, and System Security Plan Assignment

The process of data and system classification can be accomplished by assigning a classification score of 1-3 in the areas of Confidentiality, Integrity, and Availability. **Public information/data can have a classification level of 0, but all other Information Technology Resources have a minimum classification of 1.**

Confidentiality

UTHSC data and IT Resources are classified into one of four levels based on the level of concern related to confidentiality. C-3 requires the most security controls, and C-0 requires none.

The relationship between the confidentiality classification and potential impact can be seen in Figure 1.

Classification Rating	Classification Definition	System Security Plan Assignment	Possible Impact Score	Impact to Confidentiality
				The unauthorized use or disclosure of information resources could be expected to have:
C-0 ***Reserved for publicly released information. All other Information Technology Resources have a minimum classification of C-1***	Data which there is no expectation for privacy or confidentiality and is available for immediate public access. Examples include, but are not limited to: -Public-facing informational websites -Public directory information -Job postings -Published research -Press releases -Campus maps	None	1. Negligible	Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.

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C-1	<p>An asset that stores, processes, or transmits data that is potentially sensitive and is not intended to be shared with the public. C-1 data generally should not be disclosed outside of the University without the permission of the data owner. An asset that stores, processes, or transmits data for which unauthorized use, access, disclosure, or acquisition could result in negligible to minor damage or small financial loss or cause minor impact on the privacy of an individual.</p> <p>Examples include, but are not limited to:</p> <ul style="list-style-type: none"> -Routine business records -Routine email not containing C-2 or C-3 information -Calendar information not containing C-2 or C-3 information -Meeting notes not containing C2 or C3 information -Draft research papers 	Level 1	1. Negligible	<p>Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>
			2. Minor	<p>Minor (minor damage or financial loss or cause minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>

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	<ul style="list-style-type: none"> -Unpublished research using publicly available data -De-identified data not containing C-2 or C-3 information 			
C-2	<p>An asset that stores, processes, or transmits data whose unauthorized disclosure could result in minor to moderate fines, penalties, or civil actions. Institutional Information of which unauthorized use, access, disclosure, or acquisition, could result in minor to severe damage to UTHSC, its students, patients, research subjects, employees, community and/or reputation; could have a minor to severe impact on the</p>	Level 2	2. Minor	<p>Minor (minor damage or financial loss or cause minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>

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	<p>privacy of a small to large group; could result in minor to severe financial loss; or could require legal action. This classification level also includes lower risk items that, when combined, represent increased risk.</p> <p>Examples include, but are not limited to:</p> <ul style="list-style-type: none"> -UTHSC personnel records -IT security information -Security camera recordings -Export-controlled research -Educational records not containing PII -Any type of PII not classified as C-3 -Medical devices supporting diagnostics not containing C-3 information -Industrial control systems affecting operations 		3. Moderate	<p>Moderate (moderate damage or financial loss or cause moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>
			4. Severe	<p>Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant</p>

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				interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.
C-3	<p>An asset that stores, processes, or transmits data whose unauthorized disclosure could result in significant fines, penalties, regulatory action, or civil or criminal violations. Statutory, regulatory and contract obligations are major drivers for this risk level.</p> <p>Other drivers include, but are not limited to, the risk of significant harm or impairment to UTHSC students, patients, research subjects, employees, guests/program</p>	Level 3	3. Moderate	<p>Moderate (moderate damage or financial loss or cause moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>

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	<p>participants, UTHSC reputation, or the overall operation of the Location or essential services. This classification level also includes lower risk items that, when combined, represent increased risk.</p> <p>Examples include, but are not limited to:</p> <ul style="list-style-type: none"> -Credit card information -Financial aid information -Controlled unclassified information (CUI) -Protected health information (patient records) -Limited data sets that still contain some identifying information 			<p>4. Severe</p>	<p>Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>
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	<ul style="list-style-type: none"> -Social security numbers -Sensitive identifiable human subject research data -Authentication information -Sensitive data governed by a contract which may include a DUA, BAA or other contractual obligations -Other PII in large data sets -Medical devices support care -Industrial control systems affecting life and safety 		5. Catastrophic	<p>Catastrophic (regulatory action, civil or criminal violations or significant risk affecting life and safety) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse or unauthorized access to financial, medical, or personal information.</p>
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Figure 1

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Integrity

UTHSC data and IT Resources are classified into one of four levels based on the level of concern related to integrity. I-3 requires the most security controls, and I-0 requires none.

The relationship between the *integrity* classification and potential impact can be seen in Figure 2.

Classification Rating	Classification Definition	System Security Plan Assignment	Possible Impact Score	Impact to Integrity
				The unauthorized, unexpected, or accidental modification, destruction, or deletion of information resources could be expected to have:
I-0 ***Reserved for data only. All other Information Technology Resources have a minimum classification of I-1***	Data for which there is no expectation of integrity or accountability as it relates to unauthorized, unexpected, or accidental modification, destruction, or deletion of the data.	None	1. Negligible	Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification, or deletion of their financial, medical, or personal information.

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I-1	An asset that stores, processes, or transmits data for which there is a baseline expectation of integrity or accountability as it relates to unauthorized, unexpected, or accidental modification, destruction, or deletion to those systems, software, vendor, or data. A loss of integrity would be expected to result in minor adverse impact to stakeholders and basic controls should be in place to prevent, detect, and recover from adverse events.	Level 1	1. Negligible	Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification, or deletion of their financial, medical, or personal information.
			2. Minor	Minor (minor damage or financial loss or cause minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.

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I-2	An asset that stores, processes, or transmits data for which there is a moderate expectation of integrity or accountability as it relates to unauthorized, unexpected, or accidental modification, destruction, or deletion to those systems, software, vendor, or data. A loss of integrity would be expected to result in moderate to severe adverse impact to stakeholders and relative controls should be in place to prevent, detect, and recover from adverse events.	Level 2	2. Minor	Minor (minor damage or financial loss or cause minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.
			3. Moderate	Moderate (moderate damage or financial loss or cause a moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.

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			4. Major	<p>Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.</p>
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I-3	<p>An asset that stores, processes, or transmits data for which there is a mission critical expectation of integrity or accountability as it relates to unauthorized, unexpected, or accidental modification, destruction, or deletion to those systems, software, vendor, or data. A loss of integrity would be expected to result in severe to catastrophic adverse impact to stakeholders and the highest level of controls should be in place to prevent, detect, and recover from adverse events. Statutory, regulatory and contract obligations are major drivers for this risk level.</p>	Level 3	3. Moderate	<p>Moderate (moderate damage or financial loss or cause a moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.</p>
			4. Major	<p>Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student,</p>

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				patient, or study participant interests, data, privacy, and financial future against misuse, modification or deletion of their financial, medical, or personal information.
				5. Catastrophic Catastrophic (regulatory action, civil or criminal violations or significant risk affecting life and safety) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against misuse, modification, or deletion of their financial, medical, or personal information.

Figure 2

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Availability

UTHSC Institutional data and IT Resources are also classified into one of four availability levels based on the level of business impact their loss of availability or service would have on UTHSC. Compromises to A-3 data or resources would cause the highest level of impact; compromises to A-0 would cause none. A-4 requires the most security controls.

The relationship between the *availability* classification and potential impact can be seen in Figure 3.

Classification Rating	Classification Definition	System Security Plan Assignment	Possible Impact Score	Impact to Availability
				The disruption of access to or use of information resources could be expected to have:
A-0 ***Reserved for data only. All other Information Technology Resources have a minimum classification of A-1***	Data for which there is no expectation of availability as it relates to the disruption of access to or use of the data.	None	1. Negligible	Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.

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A-1	An asset that stores, processes, or transmits data for which there is a baseline expectation of availability as it relates to the disruption of access to or use of those systems, software, vendor, or data. A loss of availability would be expected to result in minor adverse impact to stakeholders and basic controls should be in place to prevent, detect, and recover from adverse events.	Level 1	1. Negligible	Negligible adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.
			2. Minor	Minor (minor damage or financial loss or cause a minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.

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A-2	<p>An asset that stores, processes, or transmits data for which there is a moderate expectation of availability as it relates to the disruption of access to or use of those systems, software, vendor, or data. A loss of availability would be expected to result in moderate to severe adverse impact to stakeholders and relative controls should be in place to prevent, detect, and recover from adverse events.</p>	Level 2	2. Minor	<p>Minor (minor damage or financial loss or cause a minor impact on the privacy of an individual) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.</p>
			3. Moderate	<p>Moderate (moderate damage or financial loss or cause moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.</p>

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			4. Major	<p>Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.</p>
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A-3	An asset that stores, processes, or transmits data for which there is a mission critical expectation of availability as it relates to the disruption of access to or use of those systems, software, vendor, or data. A loss of availability would be expected to result in severe to catastrophic adverse impact to stakeholders and the highest level of controls should be in place to prevent, detect, and recover from adverse events. Statutory, regulatory and contract obligations are major drivers for this risk level.	Level 3	3. Moderate	Moderate (moderate damage or financial loss or cause moderate impact on the privacy of a small group) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.
			4. Major	Severe (significant fines/financial loss, penalties or civil actions, damage to UTHSC, its faculty, employees, students, patients, study participants, community and/or reputation related to a breach or compromise; or could require legal action) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student,

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				patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.
				5. Catastrophic Catastrophic (regulatory action, civil or criminal violations, or significant risk affecting life and safety) adverse effect on UTHSC mission, UTHSC department objectives, or UTHSC obligations to protect faculty, employee, student, patient, or study participant interests, data, privacy, and financial future against adverse events impacting the availability of the UTHSC systems, software, vendors, or data.

Figure 3

Appendix B

Data that Must be labeled as “C-3”

“Classified” information

Data in any format that has been determined classified: (i) pursuant to Executive Order 12958 as amended by Executive Order 13526, or any predecessor Order, to be categorized national security information; or (ii) pursuant to the Atomic energy Act of 1954, as amended, to be restricted Data (RD).

Authentication information

Authentication information is data used to prove the identity of an individual, system, or service. Examples include:

- Passwords
- Shared secrets
- Cryptographic private keys
- Hash tables

Protected Health Information (PHI)

Protected Health Information is any information about health status, provision of health care, or payment for health care that is created or collected by a Covered Entity, and can be linked to a specific individual

Electronic Health Information (ePHI)

ePHI is defined as any protected health information (PHI) that is stored in or transmitted by electronic media. Electronic media includes computer hard drives as well as removable or transportable media, such as a magnetic tape or disk, optical disk, or digital memory card. Transmission is the movement or exchange of information in electronic form. Transmission media includes the internet, an extranet, leased lines, dial-up lines, private networks, and the physical movement of removable or transportable electronic storage media.

Payment Card Information (PCI)

Payment card information is defined as a credit card number in combination with one or more of the following data elements:

- Cardholder name
- Service code
- Expiration date
- CVC2, CVV2 or CID value
- PIN or PIN block

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- Contents of a credit card's magnetic stripe

Personal Identifiable Information (PII)

PII is defined as a person's first name or first initial and last name in combination with one or more of the following data elements:

- Social security number
- State-issued driver's license number
- State-issued identification card number
- Financial account number in combination with a security code, access code or password that would permit access to the account
- Medical and/or health insurance information

Family Educational Rights and Privacy Act of 1974 (FERPA)

FERPA defines education records as any record that directly relates to a student and is maintained by an educational agency or a party acting on behalf of the institution. Examples of education records include, but are not limited to:

- Transcripts
- Degree audit reports
- Schedules of classes
- Class rolls
- Academic history reports
- Grade rolls
- Financial records

Financial Student Aid (FSA) Data

FSA data is protected by the Graham-Leach-Bliley Act (GLBA) and other security requirements outlined by the Federal Financial Institutions Examination Council (FFIEC).

Controlled Unclassified Information (CUI)

Controlled Unclassified Information is information that requires safeguarding or dissemination controls pursuant to and consistent with applicable law, regulations, and government-wide policies but is not classified under Executive Order 13526 or the Atomic Energy Act, as amended. CUI is often associated with research having a DFARS or CMMC clause

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General Data Protection Regulation (GDPR) Data

The General Data Protection Regulation (GDPR) is a legal framework that sets guidelines for the collection and processing of personal information from individuals who live in or are citizens of the European Union (EU).

References

1. [NIST 800-53, Security and Privacy Controls for Information Systems and Organizations](#)
2. [NIST Glossary of Terms](#)
3. [UTSA IT Policy IT0115 - Information and Computer System Classification](#)
4. [Standards for Security Categorization of Federal Information and Information Systems \(FIPS 199\).](#)
5. [GP-005-Data Security](#)