



Policies and Procedures Manual

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Title: Data Classification  
Policy Administrator: Director of Information Technology Services  
Effective Date: Apr-29-2010  
Approved by: General Counsel

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**Purpose:**

The purpose of this policy is to explain the default classification for College data.

**Policy:**

**1.0 Legal Requirement and Penalties**

This Data Classification Policy is intended to ensure the College's compliance with all applicable laws and regulations governing the retention and destruction of its records. Federal and state laws and regulations require the College to maintain certain types of records for particular periods. Failure to maintain such records may subject the College and/or individuals to penalties and fines or may compromise the College's position in litigation.

**2.0 Data Covered by Policy**

This policy covers all data produced, collected or used by the College of the Holy Cross, its employees, student workers, consultants, or agents during the course of College business.

**3.0 Responsibilities**

It is the responsibility of each Department to assist in the classification of data in paper or electronic form.

**Procedures:**

**1.0 Data Classification Types**

All data covered by the Scope of this policy will be classified as either: Holy Cross Protected data, Holy Cross Sensitive data, or Holy Cross Public data.

**2.0 Holy Cross Protected data**

Holy Cross Protected data are paper and/or electronic data that contain personally identifiable information concerning any individual; is regulated by local, state, or federal privacy regulations or any voluntary industry standards; or best practices concerning protection of personally identifiable information that Holy Cross chooses to follow. Any paper or electronic data that contain this information must be classified as Holy Cross Protected Data by default.

Regulations may include, but are not limited to:

- Family Educational Rights and Privacy Act (FERPA)
- Gramm-Leach-Bliley Act (GLBA)
- Health Insurance Portability and Accountability Act (HIPAA)

- Massachusetts General Law Chapter 93H and I
- Payment Card Industry Data Security Standards (PCI DSS)

Examples, must include, but are not limited to:

- Social security numbers
- Credit card and debit card numbers
- Bank account numbers and routing information
- Driver's license numbers and state identification card numbers
- Medical records (including pharmaceutical records)

### **3.0 Holy Cross Sensitive data**

Holy Cross Sensitive data are any paper and/or electronic data that are not classified as Holy Cross Protected data which Holy Cross would not generally distribute to the public. The department originating the data is responsible for establishing classification in coordination with the Data Security Manager (College General Counsel).

Examples of the types of data include, but are not limited to:

- Academic advising records
- Student education records
- Admission files, including ACT, SAT and TOEFL scores, and high school and college transcripts and other scholastic records
- Student account data and Perkins loan information
- Financial assistance application files, student federal work-study information, scholarships and Stafford loan information
- Directory Information for those Students requesting FERPA data privacy protection as indicated in the PeopleSoft Student system.
  - Name (first and last name and/or first initial and last name)
  - Address(es) and telephone number
  - College e-mail address
  - Photograph
  - Major and minor field(s) of study, including the college, division, department, institute or program in which the student is enrolled
  - Dates of attendance
  - Grade level (such as freshman, sophomore, junior, senior or graduate level)
  - Enrollment status (undergraduate or graduate, full-time or part-time)
  - Date of graduation
  - Degree(s) received
  - Honors or awards received, including selection to a dean's list or honorary organization Name
  - Intercollegiate Athletics: Injury reports, scholarship contacts, performance records, height and weight information
  - Participation in officially recognized activities or sports
  - College e-mail address

- Budgets
- Salary information
- Alumni Information.

#### 4.0 Holy Cross Public data

Holy Cross Public data are any paper and/or electronic data that Holy Cross is comfortable distributing to the general public. For department-specific data, this classification comes from the Department. If more than one department creates data jointly, the involved departments should jointly classify the data. If they are unable to come to a consensus, the data must be classified as Holy Cross Sensitive Data. For College-wide data, this classification can only come from the Office of the President, the Office of the Registrar, Academic Affairs, Public Affairs or Human Resources.

Examples of the types of data included are:

- Department faculty lists
- Department web and mailing addresses
- Press releases
- The Holy Cross web site content

Any Holy Cross data that does not contain personally identifiable information concerning any individual and that is not Holy Cross Protected data or Holy Cross Sensitive data, is classified as Holy Cross Public data.

#### Forms:

Title
Title

#### Related Information:

M.G.L. c. 93H: <a href="http://www.malegislature.gov/laws/generallaws/parti/titlexv/chapter93h/section3">http://www.malegislature.gov/laws/generallaws/parti/titlexv/chapter93h/section3</a>
M.G.L. c. 931: <a href="http://www.malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter93I">http://www.malegislature.gov/Laws/GeneralLaws/PartI/TitleXV/Chapter93I</a>
Family Educational Rights Privacy Act [FERPA]: <a href="http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html">http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html</a>
Gramm-Leach-Bliley Act [GLBA]: <a href="http://www.fdic.gov/consumers/consumer/alerts/glba.html">http://www.fdic.gov/consumers/consumer/alerts/glba.html</a>
Health Insurance Portability & Accountability Act [HIPPA]: <a href="http://www.hhs.gov/ocr/privacy/">http://www.hhs.gov/ocr/privacy/</a>
Payment Card Industry Data Security Standards [PCI DSS]: <a href="https://www.pcisecuritystandards.org/security_standards/index.php">https://www.pcisecuritystandards.org/security_standards/index.php</a>

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