

Overview

Information accumulates over time: old email, bulging file drawers, folders on a shared server, or files on an old hard drive of a standby computer. Some data can be quite old and now long forgotten, making it more likely to contain personally identifiable information such as social security numbers. Review old files and folders and securely dispose of information no longer needed or archive that which should be saved.

Storing Only Information Needed for College Business

Besides managing old files, it will save time and potential future issues to store only the information needed to perform North Central State College business. Keep this adage in mind when dealing with electronic or paper files to help protect yourself and North Central State College.

Restricted Data Elements

Restricted Data is data protected or regulated by law or critical to college operations. The following data elements have been identified as Restricted Data in advance of the formal data classification process due to the risk associated with unauthorized disclosure of these elements.

I. SSN and Other Personally Identifiable Information

Specific Data Elements:

1. Name (First name or initial and Last name)*
2. Social Security Number
3. Driver's license number
4. State identification card number
5. Financial account numbers such as credit, debit, or bank account information (see below for more information)

* Name is not restricted unless it is stored or displayed with one or more of the other listed data elements.

Justification for Restricted Data Designation

Personally identifiable information is protected by Ohio Revised Code (Sections 1347.12, 1349.19, 1349.191, and 1349.192) from disclosure to unauthorized individuals that might lead to identify fraud or other fraud to the individual.

II. Credit Card Information

Specific Data Elements:

1. Primary Account Number
2. Cardholder Name
3. Service Code
4. Expiration Date

Justification for Restricted Data Designation

Credit card information is protected by Ohio Revised Code (Sections 1347.12, 1349.19, 1349.191, and 1349.192) from disclosure to unauthorized individuals that might lead to identify fraud or other fraud to the individual and as a requirement of the Payment Card Industry (PCI) standards.

III. Bank Account Information

Specific Data Elements:

- Bank Account Number
- Bank Account Routing Numbers
- Bank Account Pins or Passwords
- Bank Account Owner Name

Justification for Restricted Data Designation

Bank Account information is protected by Ohio Revised Code (Sections 1347.12, 1349.19, 1349.191, and 1349.192) from disclosure to unauthorized individuals that might lead to identify fraud or other fraud to the individual.

IV. Student Educational Records

Specific Data Elements:

Examples of Restricted Student Records include:

- Grades/Transcripts
- Class enrollment information
- Student Financial Aid, Grants, and Loans
- Financial account and payment information including billing statements, bank account and credit card information
- Admissions and recruiting information including test scores, high school grade point average, and high school class rank, etc.

Note: North Central State College, in accordance with the FERPA Act, has designated the following information about students as public (directory) information:

- Name
- Address (local, home and e-mail)
- Telephone (local and home)
- Program of Study (including college of enrollment, major and campus)
- Enrollment status (e.g. full-time, part-time, withdrawn)
- Dates of attendance
- Honors awarded
- Previous educational agencies or institutions attended
- Participation in officially recognized activities and sports
- Weight and height of members of intercollegiate athletic teams

Justification for Restricted Data Designation:

The privacy of a student's educational records is protected by the Family Educational Rights and Privacy Act of 1974 (FERPA).

Educational records are records, files, documents, and other materials which contain information directly related to a student that are maintained by an educational agency or institution or by a person acting for such agency or institution.

V. Personal Health Information

Specific Data Elements:

- Information about the individual's past present or future physical or mental health or condition
- Information relating to the provision of or payment for health care
- Information that identifies the individual, or could reasonably be used to identify the individual, including but not limited to: name, address, medical record number, telephone number, birthday, or admission/discharge date

Justification for Restricted Data Designation

Patient Health Information is protected by the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Handling Restricted Information

Access to North Central State College Restricted Information should be limited to those who need the information in order to fulfill professional responsibilities. All members of the North Central State College community who have been granted such access should exercise care and judgment to ensure adequate protection of North Central State College Restricted Information.

Disclosure

Individuals will not disclose any North Central State College Restricted Information that they obtain as a result of their employment at North Central State College to unauthorized persons.

Managing Access to Restricted Information

Strict control should be maintained over access to work locations, records, computer information, cash and other items of value. Individuals who are assigned keys, given special access or assigned job responsibilities in connection with the safety, security or confidentiality of such records, materials, equipment, or items of monetary value should use sound judgment and discretion in carrying out their duties and will be held accountable for any wrongdoing or acts of indiscretion. **Furthermore, information may not be divulged, copied, released, sold, loaned, reviewed, altered or destroyed except as properly authorized within the scope of applicable federal or state laws.**

At the conclusion of employment or affiliation with North Central State College, individuals shall relinquish ownership of all campus documents and records. They shall also maintain the confidentiality of campus information after leaving North Central State College.

If at any time data under your watch is thought to be compromised, the North Central State College ITS department shall be notified immediately. The intentional act of inappropriately accessing data and information or causing information to be compromised through negligence or failure to appropriately safeguard such information and data may result in disciplinary action, up to and including termination.

I have read the above agreement and understand the condition of engagement.

Employee Name (Printed)

Employee Signature

Date

Manager/Supervisor

Date

Cc: Employee File HR, ITS Department