

Institutional Data Classification Category by Role and Level of Sensitivity

The following data classification tables are organized by student and employee data. The tables are not intended to be exhaustive but, rather, are intended to be representative of the types of data elements or data that fall under each category. If a data element or type of data is not listed in any of the tables, and you are unsure which category it falls under, contact the Data Governance Program at datagov@hawaii.edu.

Student

Public – no privacy considerations

- Name
- Major field of study
- Class (i.e, freshman, sophomore, etc.)
- Past and present participation in officially recognized activities (including positions held and official statistics related to such participation and performance)
- Past and present participation in officially recognized sports (including positions held and official statistics related to such participation and performance)
- Weight and height of members of athletic teams
- Dates of attendance
- Previous institution(s) attended
- Full or part-time status
- Degree(s) conferred (including dates)
- Honors and awards (including dean's list)
- Photographs

Notes:

According to UH Administrative Procedure A7.022, Procedures Relating to Protection of the Educational Rights and Privacy of Students, and consistent with federal FERPA regulations which gives institutions the latitude to restrict its list of directory information, *UH email address, address, personal phone number, and UH ID number* of students are NOT considered student directory information at the University of Hawai'i and therefore are not available to the general public.

According to UH Administrative Procedure A7.022, Procedures Relating to Protection of the Educational Rights and Privacy of Students, the University will not release lists of students' directory information, with certain exceptions.

Restricted – used internally within the UH community but not released to external parties without a contract or memorandum of agreement

- UH email address / UH username
- Address (street name and number)
- Personal phone number
- Emergency contact phone number
- Non-UH email address
- UH ID number (may be referred to as Student or Employee ID number)
- Other identifiers for internal use such as Banner PIDM, ODS PIDM, etc.
- Security camera videos

Sensitive – subject to privacy considerations; default category for most data

- Date of birth
- Other education record data that is not considered directory or restricted information, such as gender, ethnicity, grades, course taken, GPA, etc.
- Job applicant records (names, transcripts, etc.)
- Salary and payroll information
- Access codes, passwords, and PINs for online information systems
- Answers to “security questions,” such as “what is the name of your favorite pet?”
- Confidential information subject to attorney-client privilege

Regulated – highly sensitive data that is subject to state breach notification requirements or financial fines

- An individual’s first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted:
 - Social Security Number
 - Driver license number or Hawai’i identification card number
 - Account number, credit or debit card number, access code, or password that would permit access to an individual’s financial account
- Credit cards and other financial information subject to Payment Card Industry Data Security Standard (PCI-DSS) and the Gramm-Leach-Bliley Act (GLBA)
- Health information, including anything covered by the Health Insurance Portability and Accountability Act (HIPAA)
- Financial aid information included on the Free Application for Federal Student Aid (FAFSA) application (e.g., income, asset, and other financial data, marital and dependency status, household size, etc.) and subject to the Gramm-Leach-Bliley Act (GLBA)

Employee

Public – no privacy considerations

- Name
- Compensation (for executive/managerial and faculty only; salary ranges for all other employee groups)
- Job title
- Business address
- Business phone number
- UH email address
- Job description

- Education/training background
- Type of appointment
- Service computation date
- Job code/occupational group/class code
- Collective bargaining unit code
- Department code/description
- Island of employment
- Photographs

Restricted – used internally within the UH community but not released to external parties without a contract or memorandum of agreement

- UH ID number (may be referred to as Student or Employee ID number)
- Non-UH email address
- Other identifiers for internal use such as Banner PIDM, ODS PIDM, etc.
- Security camera videos

Sensitive – subject to privacy considerations

- Date of birth
- Address
- Personal phone number
- Job applicant records (names, transcripts, background checks, etc.)
- Salary and payroll information
- Access codes, passwords, and PINs for online information systems
- Answers to “security questions,” such as “what is the name of your favorite pet?”
- Confidential information subject to attorney-client privilege
- Information made confidential by a collective bargaining agreement

Regulated – highly sensitive data that is subject to state breach notification requirements, financial fines, or other penalties

- An individual's first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted:
 - Social Security Number
 - Driver license number or Hawai'i identification card number
 - Account number, credit or debit card number, access code, or password that would permit access to an individual's financial account
- Credit cards and other financial information subject to Payment Card Industry Data Security Standard (PCI-DSS) and the Gramm-Leach-Bliley Act (GLBA)
- Health information, including anything covered by the Health Insurance Portability and Accountability Act (HIPAA)

Other

- UH research data or other UH intellectual property should be treated as Sensitive
- Administrative/business data used for operational purposes should be treated as Restricted, unless public disclosure is allowed under Chapter 92F-12