



Applies to: Faculty, staff, students, contractors, volunteers, visitors, sponsored guests of academic and administrative units, and affiliated entities who have access to institutional data.

The table below shows the data elements for the Institutional Data Policy, the supporting regulation or university requirement and each element’s classification. In cases where the data element belongs to more than one classification, the highest classification is applicable.

For any data elements not listed below, please use “Internal” as the default classification. Please contact the Institutional Data Classification Committee (IDCC) at idcc@osu.edu with any questions regarding data element classification.

Data Elements	Justification, Policy and/or Regulation	Data Classification**
REGULATORY		
Name + Social Security Number (SSN)	Ohio Revised Code 1347.12	Restricted
Name + Driver’s License Number	Ohio Revised Code 1347.12	Restricted
Name + State ID Card Number	Ohio Revised Code 1347.12	Restricted
Name + Financial Account Numbers ¹ + Access Code	Ohio Revised Code 1347.12	Restricted
Debit or Credit Card Cardholder Data ²	Ohio Revised Code 1347.12 Payment Card Industry (PCI) Security Standards Fair and Accurate Credit Transactions Act	Restricted
Student Education Record ³	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Private
Student Treatment Record ⁴	Family Educational Rights and Privacy Act (FERPA)	Restricted
Student Directory Information ⁵ (if <u>not</u> withheld per student request)	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Public
Student Directory Information (if withheld per student request)	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Private
Protected Health Information ⁶	Health Insurance Portability And Accessibility Act (HIPAA) Health Information Technology For Economic & Clinical Health (HITECH) Act	Restricted
Export Controlled Data ⁷	International Traffic In Arms Regulations (ITAR) Export Administration Regulations (EAR) Export Control Policy	Restricted
Student Loan Application Data	Gramm-Leach-Bliley Act (GLBA)	Restricted
Financial Account Data Associated with Student Loans	Gramm-Leach-Bliley Act (GLBA)	Restricted

** For more information, see “[Institutional Data Classifications: Basics](#)”.



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Data Elements	Justification, Policy and/or Regulation	Data Classification**
UNIVERSITY		
Privileged Attorney-Client Data	Attorney-Client Privilege	Private
Contracts ⁸	Contractual Agreements	Internal
Software License Keys	Contractual Agreements	Internal
Non-Public Network Addresses	Information Security	Internal
Network and System Diagrams and Configurations	Information Security	Private
Information Security Audit and Investigative Data	Information Security	Internal
Business Continuity Plans	Information Security	Internal
Critical Infrastructure Plans and Diagrams	Information Security	Private
Token Numbers / Passcodes Providing Authorization to Information Systems	Information Security	Private
Password, Private Encryption Key, and Identity Management Database or Repository	Information Security	Restricted
Risk and Information Security Assessments ⁹	Information Security	Restricted
Merchant IDs ¹⁰	Information Security	Private
Trade Secret	Intellectual Property	Private
Copyright ¹¹	Intellectual Property	Internal
Patent	Intellectual Property	Internal
Trademark and Licensed	Intellectual Property	Internal
Med Center Badge ID	Financial and/or Facility Access	Restricted
BuckID (Individual IDs)	Financial and/or Facility Access	Private
BuckID Database or Repository	Financial and/or Facility Access	Restricted
Bank Account + Routing Number	Financial and/or Facility Access	Restricted

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Data Elements	Justification, Policy and/or Regulation	Data Classification**
UNIVERSITY (CONTINUED)		
Birthdates	Personally Identifiable Information (PII)	Private
Home Address	Personally Identifiable Information (PII)	Internal
Personal / Home Contact Information	Personally Identifiable Information (PII)	Internal
Birth Location	Personally Identifiable Information (PII)	Private
Emergency Contacts	Personally Identifiable Information (PII)	Internal
Library Circulation Records	Personally Identifiable Information (PII)	Private
Family addresses	Personally Identifiable Information (PII)	Internal
Telephony Call Records	Personally Identifiable Information (PII)	Internal
Vendor Taxpayer ID / EIN¹²	Personally Identifiable Information (PII)	Internal
Ethnicity	Personally Identifiable Information (PII)	Internal
Private email addresses	Personally Identifiable Information (PII)	Internal
Passport #	Personally Identifiable Information (PII)	Private
Donor Information	Personally Identifiable Information (PII)	Private
Employee ID / Student ID	Secondary Identification Data	Internal

** For more information, see "[Institutional Data Classifications: Basics](#)".

¹ Financial Account Numbers include, but are not limited to, bank account; BuckID; credit or debit card number, in combination with access code; and security code or password that would permit access to an individual's financial account. ([Return to table](#))

² Cardholder Data includes the primary card account number, cardholder name, service code (the 3- or 4-digit code on the front or back of a payment card), pin and expiration date. ([Return to table](#))

³ Student Education Record includes name (or other data that can reasonably identify the student) and class enrollment data, student financial aid, grants, loans and award information, admissions data (including test scores, high school grade average, class rank), grades, GPA and transcripts. ([Return to table](#))

⁴ Student Treatment Records are student medical and psychological records created and maintained by health professionals solely for treatment purposes. ([Return to table](#))



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⁵ Student Directory Information includes name, address, phone, program of study, enrollment status, dates of attendance, honors awarded, previous educational agencies or institutions attended, participation in officially recognized activities and sports and the weight and height of members of athletic teams. ([Return to table](#))

⁶ Protected Health Information includes the data below as it is used to associate patient health information:

(A) Names

(B) All geographic subdivisions smaller than a state, including street address, city, county, precinct, ZIP code and their equivalent geocodes, except for the initial three digits of the ZIP code if, according to the current publicly available data from the Bureau of the Census:

(1) The geographic unit formed by combining all ZIP codes with the same three initial digits contains more than 20,000 people; and

(2) The initial three digits of a ZIP code for all such geographic units containing 20,000 or fewer people is changed to 000"

(C) All elements of dates (except year) for dates that are directly related to an individual, including birth date, admission date, discharge date, death date and all ages over 89 and all elements of dates (including year) indicative of such age, except that such ages and elements may be aggregated into a single category of age 90 or older

(D) Telephone numbers

(E) Fax numbers

(F) Email addresses

(G) Social Security numbers

(H) Medical record numbers

(I) Health plan beneficiary numbers

(J) Account numbers

(K) Certificate/license numbers

(L) Vehicle identifiers and serial numbers, including license plate numbers

(M) Device identifiers and serial numbers

(N) Web Universal Resource Locators (URLs)

(O) Internet Protocol (IP) addresses

(P) Biometric identifiers, including finger and voice prints

(Q) Full-face photographs and any comparable images

(R) Any other unique identifying number, characteristic, or code, except as permitted. ([Return to table](#))

⁷ Export Controlled Data includes any information, data, and/or technology controlled under the licensing provisions of the International Traffic In Arms Regulations (ITAR) under 22 CFR 120-130, or the Export Administration Regulations (EAR) under 15 730-774. Export Controlled Data does not include public data or data that results from Fundamental Research. ([Return to table](#))

⁸ Any trade secret information contained in contracts must be treated as "Private" as indicated in the "Trade Secret" data element classification and exempt from public records request and disclosure. ([Return to table](#))

⁹ Restricted classification pertains to those risk and security assessment containing detailed information regarding system, network and device identification and their potential vulnerabilities. ([Return to table](#))

¹⁰ To accept payments online, a Merchant ID is needed. This is required for all businesses that wish to process online card payments. ([Return to table](#))

¹¹ Default internal data classification applies until OSU owner has transferred or licensed externally. ([Return to table](#))

¹² If the Vendor Taxpayer ID/EIN contains a Social Security number that is identifiable to an individual, it must be treated as Restricted. ([Return to table](#))