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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 Data Governance at DataGovernance@osu.edu with any questions regarding data element classification.

Please see the IDP Calculator which compiles the following information from the IDP supporting documents.

Data Elements	Justification, Policy and/or Regulation	Data Classification**
REGULATORY		
Name + Social Security Number (SSN)	Ohio Revised Code 1347.12	Restricted (S4)
Name + Driver's License Number	Ohio Revised Code 1347.12	Restricted (S4)
Name + State ID Card Number	Ohio Revised Code 1347.12	Restricted (S4)
Name + Financial Account Numbers[1] + Access Code	Ohio Revised Code 1347.12	Restricted (S4)
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 (S4)
Student Education Record[3]	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Private (S3)
Student Treatment Record	Family Educational Rights and Privacy Act (FERPA)	Restricted (S4)
Student Directory Information[4] (if not withheld per student request)	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Public (S1)
Student Directory Information (if withheld per student request)	Family Educational Rights and Privacy Act (FERPA) Privacy and Release of Student Education Records	Private (S3)
Protected Health Information (PHI)[5]	Health Insurance Portability And Accessibility Act (HIPAA) Health Information Technology For Economic & Clinical Health (HITECH) Act	Restricted (S4)
Export Controlled Data[6]	International Traffic In Arms Regulations (ITAR) Export Administration Regulations (EAR) Export Control Policy	Restricted (S4)
Export Controlled Data – EAR 99	Export Administration Regulations (EAR) Export Control Policy	Private (S3)
Controlled Unclassified Information (CUI)	Executive Order 13556 – Controlled Unclassified Information and Implementing Regulation – 32 CFR Part 2002 'Controlled Unclassified Information'	Restricted (S4)

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Data Elements	Justification, Policy and/or Regulation	Data Classification**
UNIVERSITY		
Student Loan Application Data	Gramm-Leach-Bliley Act (GLBA)	Restricted (S4)
Financial Account Data Associated with Student Loans	Gramm-Leach-Bliley Act (GLBA)	Restricted (S4)
Privileged Attorney-Client Data	Attorney-Client Privilege	Private (S3)
Contracts[7]	Contractual Agreements	Internal (S2)
Software License Keys	Contractual Agreements	Internal (S2)
Research Health Information (RHI)[8]	Information Security	Restricted (S4)
Non-Public Network Addresses	Information Security	Internal (S2)
Information Security Investigative Data	Information Security	Restricted (S4)
Business Continuity Plans	Information Security	Internal (S2)
Critical Infrastructure Plans and Diagrams[9]	Information Security	Private (S3)
Token Numbers / Passcodes Providing Authorization to Information Systems	Information Security	Private (S3)
Password, Private Encryption Key, and Identity Management Database or Repository	Information Security	Restricted (S4)
Risk and Information Security Assessments[10]	Information Security	Restricted (S4)
Merchant IDs[11]	Information Security	Private (S3)
Internal, credentialed vulnerability scan results	Information Security	Restricted (S4)
External, non-credentialed vulnerability scan results	Information Security	Internal (S2)
Trade Secret	Intellectual Property	Private (S3)
Copyright[12]	Intellectual Property	Internal (S2)
Patent	Intellectual Property	Internal (S2)
Trademark and Licensed	Intellectual Property	Internal (S2)
Photo of physical key – single key	Financial and/or Facility Access	Private (S3)
Repository of photos of physical keys	Financial and/or Facility Access	Restricted (S4)
Med Center Badge ID	Financial and/or Facility Access	Restricted (S4)
BuckID (Individual IDs)	Financial and/or Facility Access	Private (S3)

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Data Elements	Justification, Policy and/or Regulation	Data Classification**
UNIVERSITY (CONTINUED)		
BuckID Database or Repository	Financial and/or Facility Access	Restricted (S4)
Bank Account + Routing Number	Financial and/or Facility Access	Restricted (S4)
FAFSA/ISIR data in its entirety	Higher Education Act (HEA), Student Aid Internet Gateway (SAIG), Privacy Act of 1974	Restricted (S4)
FAFSA/ISIR de-identified (without PII)	Higher Education Act (HEA), Student Aid Internet Gateway (SAIG), Privacy Act of 1974	Private (S3)
Alien Registration[13]	Personally Identifiable Information (PII)[14]	Private (S3)
Birthdates	Personally Identifiable Information (PII)	Private (S3)
Home Address (Non-Student)	Personally Identifiable Information (PII)	Internal (S2)
Personal / Home Contact Information	Personally Identifiable Information (PII)	Internal (S2)
Birth Location	Personally Identifiable Information (PII)	Private (S3)
Emergency Contacts	Personally Identifiable Information (PII)	Internal (S2)
Library Circulation Records	Personally Identifiable Information (PII)	Private (S3)
Family addresses	Personally Identifiable Information (PII)	Internal (S2)
Telephony Call Records	Personally Identifiable Information (PII)	Internal (S2)
Vendor Taxpayer ID / EIN[15]	Personally Identifiable Information (PII)	Internal (S2)
Ethnicity	Personally Identifiable Information (PII)	Internal (S2)
Private email addresses	Personally Identifiable Information (PII)	Internal (S2)
Passport #	Personally Identifiable Information (PII)	Private (S3)
Donor Information[16]	Personally Identifiable Information (PII)	Private (S3)
Employee ID / Student ID	Secondary Identification Data	Internal (S2)

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[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.

[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. This may be classified as S3 (Private) if the customer is redirected to a payment processor for payment (and not redirected by an API). You must validate this via the Ohio State University PCI committee by contacting the Office of Business and Finance at BF-treasury-mgt@osu.edu.

[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.

[4] Student Directory Information includes name, permanent 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.

[5] 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.

[6] 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 CFR 730-774, with the exception of data classified as EAR99 under the EAR. Export Controlled Data does not include public data or data that results from Fundamental Research. Data determined to be EAR99 under the EAR may be subject to additional security requirements stipulated by contract or Technology Control Plan (TCP). For more information contact exportcontrol@osu.edu.

[7] 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.

[8] Research Health Information is defined as information collected about research subjects that pertains to their health or healthcare which either:

    (A) is created or received in connection with research that does not involve a covered health care component or

    (B) has been reclassified and is no longer subject to HIPAA requirements due to a disclosure from an outside covered entity or university or a health care component pursuant to a valid HIPAA research disclosure, such as a valid authorization or waiver or alteration of authorization.

[9] Critical Infrastructure Plans and Diagrams include any graphical representation of utilities and the interiors of buildings. This includes:

    (A) Architectural 2D and 3D floor plans and details

    (B) 2D and 3D drawings and diagrams associated with all building disciplines, which includes but is not limited to: mechanical/HVAC, electrical, plumbing, technology, structural, fire alarm and protection, and life safety.

    (C) 2D and 3D drawings and diagrams representing all underground and above ground utilities that traverse university property, which includes, but is not limited to: compressed gas, chilled water, data communications, cold water, fuel, natural gas, geothermal, hot water, high and low voltage electric, irrigation, sewer, steam, storm, traffic signaling, and tunnels.

The following are not considered critical data and are excluded from the above definition:

(A) 2D and 3D representations of the exteriors of buildings

(B) 2D and 3D campus map information such as roads, sidewalks, trees/landscape, parking, building footprints, amenity points and transportation network information

(C) Aerial imagery

[10] Restricted classification pertains to those risk and security assessment containing detailed information regarding system, network and device identification and their potential vulnerabilities.

[11] To accept payments online, a Merchant ID is needed. This is required for all businesses that wish to process online card payments.

[12] Default internal data classification applies until OSU owner has transferred or licensed externally.

[13] Includes Employment Authorization Document (EAD), USCIS #, and Alien Registration #.

[14] Personally Identifiable Information (PII) is defined as information which can be used to distinguish or trace an individual's identity such as their name, social security number, biometric records, etc. alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual. PII includes the data below as it is used to associate the identity of an individual:

- (A) Names
  - (1) Full name
  - (2) Maiden name
  - (3) Mother's maiden name
  - (4) Alias
- (B) Personal identification number
  - (1) Social security number
  - (2) Passport number
  - (3) Driver's license number
  - (4) Taxpayer identification number
  - (5) Financial account or credit card number
- (C) Address
  - (1) Physical street address
  - (2) Email address
- (D) Personal characteristics
  - (1) Photographic image (especially of face or other identifying characteristics like tattoos, birth marks, etc.)
  - (2) Fingerprints
  - (3) Handwriting
  - (4) Biometric data (e.g. retina scan, voice signature, facial geometry)
  - (5) Ethnicity
- (E) Miscellaneous
  - (1) Birthdate
  - (2) Library Circulation Records
  - (3) Alien Registration
  - (4) Birth Location
  - (5) Emergency Contacts
  - (6) Family Addresses
  - (7) Alumni and Donor Information

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

[16] Donor information includes donor giving history and prospect research information on donors and potential fundraising prospects to facilitate fundraising and engagement with the university.