Sensitivity and Criticality of Data (ISSP-001)

Introduction

The measures put in place to adequately ensure the security of electronic data depend on two parameters: the sensitivity of the data, and the level of criticality of the data. The equipment housing this data inherits the level of criticality and sensitivity of the information it contains. This equipment can be a server, a desktop computer, or a backup tape.

This document offers guidelines for the classification of electronic resources within the University of South Florida according to their level of criticality and sensitivity.

Sensitivity

Sensitivity is a measure of how freely the data can be handled. The sensitivity of a resource falls within 2 categories: restricted or unrestricted.

Restricted Data

Data is considered restricted when access and/or modification of the data is controlled. The scope of this control may vary. Some data may be available to University employees on a need-to-know basis. Others may only be available for use within a specific department. It is the responsibility of the local administrators to understand and implement the types of restriction that must be imposed on such data.

Restricted Personal Data

Regulations such as the Health Insurance Portability and Accountability Act (HIPAA), the Financial Modernization Act (GLB), and the Family Educational Rights Privacy Act (FERPA) require that the University restrict access to certain personal information housed in a University computer. Certain data tokens may not be restricted data when published alone, and yet become restricted when combined with other personally identifiable information. Some examples of data which are considered Restricted Personal Data:

- Social security number
- Credit card number
- Student GPA
- Student citizenship
- Tax return information
- Financial aid information
- Health screening results

Restricted Limited Data

The University may require stricter control over access to data which does not involve personal data. This would include data that, if compromised, could seriously or adversely affect the University through financial loss, loss of confidence, or loss of public standing. Some data may be considered limited if the data proprietor chooses to protect it from general access or modification. Some examples:

- Data obtained through research grants
- Internal audit results
- Departmental budget projections
- Scholarship data

**Unrestricted Data**
Unrestricted data is data for which control is not mandated by Federal or State regulations, University policy, or by the data custodian.
- Directory information, when confidentiality has not been requested
- Student handbooks
- Class catalogue

**Levels of Criticality**
Criticality is a measure of the importance of the data. Data considered sensitive may not necessarily be considered critical. Assigning a level of criticality to a particular data set must take into consideration the answer to a few questions:
1) Will administrators be able to recover the data set in case of disaster?
2) How long will the recovery process take?
3) What is the effect of this downtime, including loss of public standing?

With these questions in mind, data can be placed in the following classes:

**Essential Data**
Data is considered essential when it is critical to the business of the University. When essential data is not available, even for a brief period of time, or its integrity is questionable, the University will be unable to function. The results could be loss of funds for the University and potential liability.
- Financial data
- Human Resources information
- Student records
- Authentication data
- Online courseware data
- Research data

**Required Data**
Data is considered required when it is important to the campus, but University operations would continue for a pre-determined period of time even if the data is not available
- Student email

**Deferrable Data**
Data should be classified as deferrable if the University is be able to operate without it during extended periods of time.
- Student web pages
- Student blogs
- Emailing lists, such as USF-NEWS