

Data Risk Classification

Division: Finance and Management

Responsible Office: Computing and Instructional Technology

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POLICY SUMMARY

Buffalo State University is committed to the confidentiality, integrity, and availability of information important to the university mission. All university data must be classified into one of three categories described in this policy and protected using the appropriate security measures consistent with the minimum standards for the classification category as described in related information/data security policies.

POLICY STATEMENT

Buffalo State has classified its physical and electronic data into three risk-based categories for the purpose of determining who is allowed to access the information and what security precautions must be taken to protect it. This policy facilitates applying the appropriate security controls to university data, and assists data owners in determining the level of security required to protect data on the systems for which they are responsible.

Please note that the following Data Risk Classification Categories and Risk from Disclosure levels use the Federal Information Processing Standards (FIPS) 199. The Minimum Security Standards use the NIST Special Publication 800- 53 Revision 4 Security and Privacy Controls for Federal Information Systems and Organizations.

DATA IS CLASSIFIED INTO THREE CATEGORIES

Data Risk Classification Category	Category 3 - Restricted
Minimum Security Standard	NIST 800-53-III High
Risk from Disclosure	High
Definition	• Protection of the data is required by law/regulation. The loss of confidentiality, integrity, or availability of the data or system could have a significant adverse impact on our mission, safety, finances, or reputation. • Restricted data is defined using the definition of private information in the New York State Security and Breach Notification Act as a foundation: bank

	account/credit card/debit card numbers, social security numbers, state- issued driver license numbers, and state-issued non-driver identification numbers. To this list, university policy adds protected health information (PHI), IT authentication credentials, and passport numbers. Restricted data may be exempt from disclosure/release under the New York State Freedom of Information Law (FOIL). The Information Security Breach and Notification Act requires the university to disclose any breach of the data to affected individuals.
Examples	- Social security number (SSN) - Driver license number - State-issued non-driver ID number - Bank/financial account number - Credit/debit card number (CCN) - Protected Health Information - Passport and Visa numbers - University IT authentication credentials - Documents protected by attorney-client privilege
Data Risk Classification Category	Category 2 - Private
Minimum Security Standard	NIST 800-53-II Moderate
Risk from Disclosure	Moderate
Definition	- Includes university data not identified as Category 3 Data, but includes data protected by state and federal regulations. This includes FERPA-protected student records and electronic records that are specifically exempted from disclosure by the New York State FOIL. - Private data must be protected to ensure that it is not inadvertently or unnecessarily disclosed in a FOIL request. FOIL excludes data that if disclosed would constitute an <i>unwarranted invasion of personal privacy</i>. - The NIST Special Publication 800-171 Protecting Controlled Unclassified Information in Nonfederal Information Systems and Organizations maps to the Category 2 - Private data risk classification.
Examples	Data of the following types that are specifically exempted from disclosure under FOIL: - FERPA-protected data - Gramm-Leach Bliley data - Law enforcement investigation data, judicial proceedings data including student disciplinary or judicial action information - IT infrastructure data - Collective bargaining negotiation data, contract negotiation data

	• Trade secret data • Protected data related to research • University intellectual property • Data protected by external non-disclosure agreements • Inter- or intra-agency data which are not: statistical or factual tabulations; instructions to staff that affect the public; final agency policy or determination; external audit data • University person number (BannerID, SUNYID, NYS Employee ID) • Licensed software • Intellectual property
Data Risk Classification Category	Category 1 - Public
Minimum Security Standard	800-53 Low
Risk from Disclosure	Low
Definition	• Includes university data not included in Category 3 or Category 2 and data that is intended for public disclosure. The loss of confidentiality of this data or the systems containing it would have no adverse impact on Buffalo State's mission, safety, finances, or reputation. • Public data includes any data that is releasable in accordance with FOIL. This category also includes general access data, such as that available on unauthenticated portions of the institution's website. • Public data has no requirements for confidentiality; however, systems housing the data should take reasonable measures to protect its integrity and availability.
Examples	• Network usernames • Information authorized to be available on or through the university's website without network authentication • Policy and procedure manuals designated by the owner as public • Job postings • University contact information not designated by the individual as "private" • Information in the public domain • Publicly available campus maps • External reporting data

All university data stored on Buffalo State resources or other resources where university business occurs must be classified into one of the three categories. Based on the data classification, data trustees, stewards, custodians, and users are required to implement the appropriate minimum-security standards for protecting the data. The standard for protecting the data becomes more stringent as the risk from disclosure increases.

Compliance with the Data Risk Classification Policy and the corresponding minimum-security standards should be incorporated into business processes to ensure data is properly secured. Data that is personal to the operator of a system and stored on a university information technology (IT) resource as a result of incidental personal use is not considered university data. University data stored on non-university IT resources must still be verifiably protected according to respective minimum-security standards.

APPLICABILITY

This policy applies to all members of the university community, as well as to third parties who handle university data.

RELATED PROCEDURES

[Buffalo State Guidelines for Storing and Transmitting University Data](#)

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