Dallas County
Community College District

DCCCD Information Privacy & Security Program Information Classification Scheme

The District, as a public entity, is governed by the Texas Public Information Act, which requires disclosure of information by a public body -- unless the law specifically protects that information. In general, the classification given to information is a shorthand way of determining how this information is to be handled and protected by District school officials. The information classification scheme must be reviewed annually by the District Information Security Officer.

According to the Texas Administrative Code § 202.71, institutions of higher education are responsible for defining all information classification categories except the confidential Information category, which is defined in Subchapter A of § 202.1, and establishing the appropriate controls for each category. These classifications are defined to ensure understanding and consistency in their application. This information classification scheme must be used throughout the District.

The following general categories of information serve to provide guidance for users or recipients in understanding how information is handled and protected by the District.

CATEGORY I - PUBLIC INFORMATION

This information is public and its disclosure is required by law.

Examples of public information include but are not limited to:

- DCCCD Internet Web site contents for general viewing
- Reports pertaining to public fund expenditures
- DCCCD policy statements
- Election information, including candidates' applications and campaign finance reports
- Press releases
- **Student Directory information <u>not marked private</u>:**
  The following information is public unless the student has requested non-disclosure
  (If a directory privacy flag has been requested see CATEGORY II – INTERNAL INFORMATION)
    - Name
    - Home address
    - Home telephone number
    - E-mail Address
    - Field of study
    - Photograph
    - Date and Place of Birth
    - Dates of attendance

- Enrollment status, (i.e., full or part time, graduate or undergrad)
- Degrees, certificates and other honors and awards received
- Type of award received (i.e., academic, technical, Tech-Prep, or Continuing Ed.)
- Participation in officially-recognized activities
- Weight and height of members of athletic teams
- Student classification
- Name of the most recent previous institution attended

- **Employee information <u>not marked private</u>:**
  The following information is Public unless the employee has requested non-disclosure of the items with an asterisk. (If a directory privacy flag has been requested of the items with an asterisk see CATEGORY II – INTERNAL INFORMATION)
  (Note: By law, these asterisked items are non-disclosable for a campus peace officer.)
  - Name
  - Home address*
  - Home telephone number*
  - District provided E-mail Address
  - Gender
  - Ethnicity
  - Job Title
  - Salary
  - Dates of employment
  - Any information that reveals family members of an employee*

For additional examples, see Texas Public Information Act, SectionA552.022. CATEGORIES OF PUBLIC INFORMATION.

CATEGORY II – INTERNAL INFORMATION

This information is generally considered only for internal use by District school officials as needed for their job functions and is not disclosable to the public unless required by law.

Examples of internal information include but are not limited to:

- Internal memorandums or e-mails
- Internal meeting minutes
- Internal (Intranet) Web sites
- Business procedures
- Student ID
- Employee ID
- Driver’s license number
- Personnel records excluding information categorized as confidential
- **Student Directory information <u>marked private</u>:**
  The following information is marked private by the student’s request for non-disclosure
  (If a directory privacy flag has not been requested see CATEGORY I – PUBLIC INFORMATION)
  - Name
  - Home address

- Home telephone number
- E-mail Address
- Field of study
- Photograph
- Date and Place of Birth
- Dates of attendance
- Enrollment status, (i.e., full or part time, graduate or undergrad)
- Degrees, certificates and other honors and awards received
- Type of award received (i.e., academic, technical, Tech-Prep, or Continuing Ed.)
- Participation in officially recognized activities
- Weight and height of members of athletic teams
- Student classification
- Name of the most recent previous institution attended

- **Employee information marked private:**
  The following information is marked private by the employee's request for non-disclosure
  (If a directory privacy flag has not been requested of the items with an asterisk see CATEGORY I – PUBLIC INFORMATION)
  (Note: By law, these asterisked items are non-disclosable for a campus peace officer.)
  - Home address*
  - Home telephone number*
  - Any information that reveals family members of an employee*

For additional examples, see Texas Public Information Act, SUBCHAPTER C. INFORMATION EXCEPTED FROM REQUIRED DISCLOSURE and the Federal Educational Rights and Privacy Act

CATEGORY III – CONFIDENTIAL INFORMATION

This information is private and requires protection with the **highest levels of security**, as prescribed by applicable laws, regulations and standards including, but not limited to FERPA, GLB, HIPAA, PCI Data Security Standard, USA PATRIOT Act and Texas Administrative Code Information Security Standards for Higher Education. This information is available to District school officials on a need-to-know basis (based on applicable laws, regulations and standards).

Examples of private sensitive information include but are not limited to:

- W-4 and W-2 forms
- Information that would give advantage to a competitor or bidder, and audit working documents
- Credit/charge/debit/access device card numbers and security codes
- Social security numbers
- All student records information, including grades
- Certain personnel records information, such as bank account/routing numbers and beneficiary information
- Certain medical and health benefit information, including medical records protected by HIPAA
- Passwords

For additional examples, see Texas Public Information Act, SUBCHAPTER C. INFORMATION EXCEPTED FROM REQUIRED DISCLOSURE

NOTE: Please refer to the District's Board Policies on Student Records, FJ (LOCAL) and FJ (LEGAL), definition and the handling of Student Records.

NOTE: For written requests received for Student Directory Information, notify and send to the Registrar's Office. For all other written requests, fax to District Legal. Questions regarding whether an employee has a "need-to-know" should be directed to the employee's supervisor, the location Information Security Officer, or the District Legal Counsel.

Terms

FERPA: Family Educational Rights and Privacy Act.

GLB: Gramm-Leach Bliley.

HIPAA: Health Insurance Portability and Accountability Act.

Information Classification Scheme: The classification level given to information – according to its use, sensitivity, and importance – that determines how information is to be handled and protected within DCCCD. The three categories of information are as follows:

- Category I – Public Information
- Category II – Internal Information
- Category III – Confidential Information

PCI: Payment Card Industry.

School Officials: Any employees, Trustees, or agents of the District, as well as attorneys, consultants, and independent contractors who are retained by the District. School officials have a "legitimate educational interest" in a student's record when they are working with the student; considering disciplinary or academic actions or the student's case; compiling statistical data; or investigating or evaluating programs.

USA PATRIOT Act: Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism.

Related References

- **Board Policies**
  - CS(LOCAL) Information Security
    CS(REGULATION) Information Security
    Violations DH(LOCAL) Employee Standards of Conduct
    FJ (LOCAL) Student Records
  - FJ (LEGAL) Student Records

- Texas Administrative Code Department of Information Resources Information Security Standards for Institutions of Higher Education

- Texas Public Information Act