

Vincennes University

Data Classification Levels

Confidential	Private (Internal Use)	Sensitive	Public - Directory Information
<ul style="list-style-type: none"> ● Federal tax information received from, or derived from, the IRS or secondary sources (IRS Pub. 1075) Protected Health Information (HIPAA/HITECH) ● Social Security numbers ● Debit or credit card numbers ● Driver’s license information or State identification card information ● Bank account numbers or information with personal identification numbers (PINs) or passwords ● Passport numbers ● Child welfare and legal information about minors (juvenile justice, foster care and/or adoption) ● Witness protection information ● Student education records ● Any HIPAA related records (i.e., medical, counseling center, etc.) ● Passwords 	<ul style="list-style-type: none"> ● Biometric identifiers ● Photographs of individual people ● Pension/Retirement benefit information (actual amounts) ● Personal demographics (race, place of birth, weight, religion) ● Unpublished information about agency personnel ● Information received from and/or about a business (tax information, business plans) ● Security plans, network architecture, etc. ● Dates of birth (if linked to other information about a person) ● Student ID Numbers ● Electronic Signatures ● Video surveillance 	<ul style="list-style-type: none"> ● Business Use ● Agency policies, procedures, and/or standards ● Training materials ● Internal meeting information ● Direct telephone line numbers to staff ● Personal email addresses ● Home telephone numbers ● Employee home address and information ● Aggregated data ● Emergency contact information. 	<p>Directory Information is specific information kept about the student that is considered public. This information may be released without the student's written permission. Directory information at VU includes:</p> <ul style="list-style-type: none"> ● Student Name ● Student Address ● E-mail address ● Date of Birth Classification (FR/SO/JR/SR) ● Enrollment Status (Full-time/Part-time) ● Major field of study ● Dates of Attendance ● Degrees received ● Awards and honors received ● Previous school attended ● Photograph (only for sports, university activities or awards) ¹ ● Weight and height of members of athletic teams ● Participation in officially recognized activities and sports <p>The University may disclose any of these items without the prior written consent of the student, unless notified otherwise in writing by the student each semester by the end of the first week of classes.</p>

For Review: Informed by U South Carolina and Indiana University

¹ FERPA does state that a photograph can be treated as directory information as long the student (or parent if a minor) is given notice. I see that the Registrar does list photograph in their directory info notice. (<https://www.vinu.edu/web/registrar-s-office/directory-information-at-vu>). FERPA allows it because that photo is directly related to the student so it can be part of their education record, which means we must maintain it and use it like any other item that is FERPA protected or considered directory information.

The reason the media office gets a photo waiver form signed, is because the photo may not be directly related to that student. They may incidentally be in the photo, or the photo may be focused on the activity and not the specific student partaking, etc. The University also gets a waiver because we may use the photo for marketing purposes with wide distribution that is for the benefit of the University and not the subject(s) in the photo.