

*Mountwest Administrative Procedure*

## Sensitive Data Protection

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This procedure sets standards for protection of sensitive and/or personally identifiable information (PII). It will:

- Reduce opportunities for unintended release of a person's SSN, or other sensitive data.
- Ensure access to a person's SSN in Banner is provided only to those Banner account holders with a formal "need to know".
- Identify departments on campus utilizing the SSN for business purposes.
- Identify SSN collection points/documents.
- Provide a mechanism for securing additional PII or other sensitive data in the future as needed.

**Procedure:**

**Introduction** Information security is playing an increasingly important role in the life of each individual, and consequently to the Mountwest Community & Technical College (MCTC) community. Access to sensitive data and Personally Identifiable Information (PII) should only be granted on a need to know basis and provided with an expectation of responsible and acceptable use.

**General Principles and Guidelines** The basic premise of this procedure is Banner account holders will NOT be provided access to data the institution categorizes as sensitive, unless access to that data is required in order to perform job duties. These principles and guidelines include, but are not limited to:

- Any Banner account holder that needs access to a person's SSN in Banner will be **required to complete the Banner Sensitive Data Access Request Form**.
- Request must be approved by the Banner account holder's immediate supervisor or Dean.
- Request must be approved by the MCTC Chief Information Officer.
- All completed request forms will be stored in a secure location for future reference.
- Completed request forms will be provided to an auditor upon request.

**Enforcement** Institutional data categorized as sensitive, will be masked in the Banner Information System. To receive an exemption from this procedure, the Banner account holder must complete the Banner Sensitive Data Access Request Form, justify the need for access to the requested data, and receive appropriate approval(s).

*Effective Date: December 1, 2009*

*Revised Effective Date: March 11, 2011*

*Approved by: Dr. Keith Cotroneo, President*

Signature: \_\_\_\_\_

