University of Oregon
SGHE Banner Operational Policy

Policy Statement

Policy Title:
Personally Identifiable Information in the Banner Test Database

Preamble (optional):

There are a number of Banner users in the core offices (including Admissions, Business Affairs, Financial Aid, Human Resources and Registrars) who have the task of testing new releases of the Banner product, as well as modifications and patches to the product. The Banner test database was created by copying the production database and then obfuscating all personally identifiable information, including names and UO IDs. This was done because:

1) The test database does not have the same security as the production database, and

2) There is no oversight of activity in the test database as there is in the production database.

The obfuscation of data creates problems for some of the users who want some personally identifiable information in the test database for testing purposes. In order to ensure both appropriate compliance and efficiency of operations, Information Services requested a UO policy to manage the personally identifiable information in the test database.

At the recommendation of the CFO: a representative from UO Legal Counsel, Student Enrollment Services, Human Resources, Budget and Finance, and Information Services drafted this policy.

Reason for Policy:
The purpose of this policy is to identify what personally identifiable information will be available in the Banner test database, as well as defining appropriate access roles for the users who need access to both the test and production databases.

Who is Governed by this Policy:
(Please mark all that apply)

_X_ Faculty
_X_ Students
_X_ Staff

Any Faculty, Student or Staff whose duties include Banner testing, core office security officers, IS database administrators
Who Should Know this Policy:
1) All core office management, including Admissions, Business Affairs, Financial Aid, Human Resources and the Registrars

2) All users who work in the Banner test database

3) All core office security officers

4) The Information Services Enterprise Administrative Applications group

Policy Statement:
For the purpose of providing users with the data they need while mitigating the risk of exposure of personally identifiable information in the test database:

1. Security officers in the core offices will have the responsibility for maintaining security in both the Banner test and production databases.
   a. Users with Banner testing responsibilities will have the same security access in both the test and production databases.
   b. New users without Banner testing responsibilities will have their security roles set up in the Banner production database only.

2. The following personally identifiable fields will be altered to be unidentifiable in the test database: Social Security Number (SSN)/Tax ID related information, Personal ID Numbers (PINs) (and pin-change Answers), birth dates, email addresses and bank account numbers.

   UO IDs, names and addresses will not be altered.

Procedures:
None

Exclusions and Special Situations:
None

Definitions:

Last Update 12/23/2009
Responsible University Office:
University Office: Enterprise Administrative Applications, Information Services
Contact Name: Susan Hilton, Director
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Related Documents:
None

Frequently Asked Questions:
None

Revision History:
Last updated: March 15, 2010

POLICY CONSULTATION AND REVIEW:

Consultation and review by the following individuals or groups (optional):

Drafted and reviewed by Sue Eveland (Registrar), Doug Park (UO Legal), Laura Hubbard (Budget & Finance), Linda King (Human Resources), and Stephany Freeman and Susan Hilton (IS)

Policy Reviewed and Approved by the Vice President for Finance and Administration, and the Vice Provost and CIO for Information Services.

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<tr>
<th>Print Name/Office</th>
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<td>Frances Dyke/Finance &amp; Administration</td>
<td><em>Frances Dyke</em></td>
<td>4/7/10</td>
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<td>Don Harris/Information Services</td>
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