

BURRELL COLLEGE OF OSTEOPATHIC MEDICINE

STANDARD OPERATING PROCEDURES

Requirements for transfer of PII and other sensitive data (Electronic and or Physical)	SOP #: IT.004.01
Effective Date	9/9/2019
Last Revision/Review	6.10.2024

1. Purpose

This explains the steps followed for encryption and transfer of PII and other Sensitive data.

2. Related Policy/Authority

Policy B2050 Data Security

3. Faculty/Staff Responsibilities

This applies to all faculty and staff at Burrell College Osteopathic Medicine

4. Definitions/Abbreviations

(PII) Personally Identifiable Information is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

5. Procedural Steps

- 1) PII and other sensitive Data being submitted electronically or on media (e.g., flash drive, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). Burrell uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption.
- 2) The Burrell Employee must send an access password to view the encrypted information. The password must be transmitted separately from the encrypted data. The password must meet current Burrell IT complexity standards.
- 3) Hard copy files and media containing PII must be:
 - a. sent via a shipping method that can be tracked with signature required upon delivery
 - b. double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
 - c. labeled with both the "To" and "From" addresses on both the inner and outer packages
- 4) PII data cannot be sent via fax.
- 5) Note – Receiving agencies may have alternative requirements for transmitted data. Standards that are more stringent than the above are acceptable. The Director of Information Systems can provide guidance on acceptable alternatives.

6. Reports/Charts/Forms/Attachments/Cross References

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7. Maintenance

8. Signature

Approved by | 6.10.2024
Assc. Vice-President of Administration/CIO | Date

9. Distribution List

Internal/External

10. Revision History

Revision Date	Subsection #	Summary of Changes	New/Cancellation/Replacement Procedure? (if applicable)	Approval Date
2021-12-01	All	Fixed typographical errors		12.2.2021