

**UNIVERSITY OF HOUSTON SYSTEM  
ADMINISTRATIVE MEMORANDUM**

**SECTION: General Administration**

**NUMBER: 01.D.06**

**AREA: Legal Affairs**

**SUBJECT: Protection of Confidential Information**

---

**1. PURPOSE AND SCOPE**

It is the policy of the University of Houston System (the "System") to ensure that there are guidelines, safeguards, and controls in place to effectively manage and protect confidential information in accordance with applicable laws, regulations, and best practices. Such confidential information includes, but is not limited to, social security numbers, educational records as defined by the Family Educational Rights and Privacy Act ("FERPA"), health care information as defined by the Health Insurance Portability and Accountability Act ("HIPAA"), and customer information as defined by the Gramm-Leach-Bliley Act ("GLB Act").

**2. POLICY**

- 2.1. The General Counsel will serve as the Privacy Officer for the System.
- 2.2. The Privacy Officer's duties include the issuing of guidelines with regard to the use of social security numbers, educational records, health care information, customer information, and other confidential information.
- 2.3. The guidelines will be issued by the Privacy Officer to help ensure that:
  - a. The release, use, display, transmission, and retention of social security numbers are only allowed if permitted by law.
  - b. Information that is considered an educational record (as defined by FERPA) will only be disclosed to someone other than an "eligible student" or an "eligible parent" with the consent of the student or as otherwise authorized by law.
  - c. The use, receipt, or transmission of an individual's health care information (as defined by HIPAA) is allowed only as permitted by law.
  - d. Customer information (as defined by the GLB Act), including financial information, which is collected or maintained, will be safeguarded as required by law.

- e. The use and/or release of any other information determined by the Privacy Officer to be confidential is allowed only as required by and consistent with applicable law.
- 2.4. No person having access to confidential information shall disclose confidential information in any manner except as established in the guidelines issued by the Privacy Officer.
- 2.5. It is the responsibility of each component university of the System to adhere to the guidelines that are issued by the Privacy Officer.
- 2.6. The Privacy Officer will revise its guidelines whenever necessary to conform to changes in applicable law or regulations.

3. REVIEW AND RESPONSIBILITIES

Responsible Party: Vice Chancellor for Legal Affairs

Review: Every three years on or before November 30th

4. APPROVAL

Approved:           Dona G. Hamilton            
Vice Chancellor for Legal Affairs

          John M. Rudley            
Interim Chancellor

Date:           October 17, 2007