Information Handling Guidelines

Cyber Intrusion Command Center (CICC)

Policy Number: IT-017 **Effective Date: 5/19/2016**

Information Handling Guidelines

These Information Handling Guidelines (Guidelines) shall serve as an appendix to the City of Los Angeles' (City) Information Classification Policy.

Categories of Information

Public Information

Public Information includes any data compiled or maintained by City government Under California law, City departments are required to disclose government records to the public upon request, unless exempted by statute (California Public Records Act (CPRA) California Government Code 6250 through 6276.48).

Dissemination of Public Information does not require specific approval from the owner. Public Information can be viewed or copied without restriction. The decision to make a piece of information available public should be deliberate and approved according to the Open Data Policy and the CPRA.

Open Data

As established by the City's Open Data Policy (Policy No. IT-009), Open Data is raw data generated or collected by government agencies made freely available for use by the public, subject only to valid privacy, confidentiality, security, and other legal restrictions. Open Data is data that, if made publicly available, does not violate a statute or regulation, endanger public health, safety or welfare, hinder the operation of government, or impose an undue financial, operational or administrative burden on the City of Los Angeles.

The City has established a citywide Open Data Portal to make City data freely available to companies, individuals, nonprofits, and other government agencies to promote government transparency, accountability, public/private partnerships, technical innovation, and cross-departmental efficiencies. The Open Data Policy sets out the guidelines for City departments to make open data available through the Open Data Portal.

Internal Information

Internal Information is information, the loss, disclosure, or corruption of which is of importance only inside the City and, therefore, would not result in a business, financial

or legal loss, however still requires approval before being distributed. Such information is generally not subject to disclosure under the CPRA. Regarding Internal Information, Departments should proceed with disclosure according to their own disclosure policies and consult the City Attorney as necessary. Internal Information includes:

- Preliminary drafts, notes, or inter-department or intra-department memoranda that are not retained by the City or its Departments in the ordinary course of business;
- Internal newsletters.

Confidential Information

Confidential Information is information that is subject to legal restrictions that exempt it from disclosure under the CPRA. Confidential Information is for use solely within the City or by its designated partners, and it is limited to those with a "need to know." The explicit approval of the information owner is required to release Confidential Information even to those with a need to know. Examples of Confidential Information include:

- Personally Identifiable Information, such as Social Security Numbers;
- Personal Health Information (as defined by the Health Insurance Portability and Accountability Act, “HIPAA”);
- Personal details about minors (as defined by the Family Educational Rights and Privacy Act of 1974. “FERPA”);
- Information not owned or compiled by the City Department that requires appropriate permission to be obtained by the legal owner;
- Information that, if combined with other open data or public data, will reveal private or non-publishable information (known as the mosaic effect).

Restricted Information

Restricted Information is information the loss, corruption or unauthorized disclosure of which would severely harm the City’s reputation or business position, resulting in financial, reputational, and legal loss. The release of Restricted Information requires explicit written approval of the information’s owner, even to those with a need to know. Included in this category is any information that would be considered "insider information." Restricted Information is exempt from disclosure under the CPRA. Restricted Information includes:

- Information that jeopardizes the health or safety of public safety employees (e.g., undercover officers, deployment schedules, location of infrastructure used by public safety communications, etc.);

- Critical infrastructure information that risks damage to critical public services;

- Information on legal proceedings and investigations that is exempt from disclosure under the CPRA.

Policy Identification

All Departments shall clearly identify any information that is classified above Internal (i.e. Confidential and Restricted Information) with the correct information classification title on ALL pages whether in paper or electronic format.

Information Holding Matrix

The following matrix details how each type of information shall be stored, guarded, and transmitted. All City employees and Departments shall adhere to these guidelines unless a Department has its own policies that are more stringent. Such guidelines must be approved by the City Attorney.

	Public/Open Data	**Internal**	**Confidential**	**Restricted**
Electronic Storage Location	No restrictions	All except external Web and external FTP	Managed and monitored servers	City desktop/laptop, corporate file share or corporate database
Electronic Storage Protection	Unprotected	Password authentication	Validated strong passwords or multifactor authentication	Strong multipart authentication and encryption
Physical Storage Protection	No restrictions	Take reasonable precautions to restrict access	Store in a locked container; restrict access to authorized people	Store in a locked container; restrict access to authorized people
Granting of Access	READ: No restrictions UPDATE: Information	READ: Information owner designates by role	READ: Information owner designates by individual	READ: Information owner designates by individual

	Public/Open Data	Internal	Confidential	Restricted
	owner or designee	UPDATE: Information owner designates by role	UPDATE: Information owner designates by individual	UPDATE: Information owner designates by individual
Electronic Transmission	No restrictions	Obfuscated	Encrypted	By information owner only with encryption
Faxing	No restrictions	Take reasonable precautions to restrict access and confirm delivery to recipient	Restrict access to sending machine during transmission, and notify recipient to stand by for receipt of fax and confirm delivery	Restrict access to sending machine during transmission, and notify recipient to stand by for receipt of fax and confirm delivery
Fax Cover Notice	None required	Use wording provided in "Email/Fax Cover Sheet Confidentiality Disclosure" below	Use wording provided in "Email/Fax Cover Sheet Confidentiality Disclosure" below	Use wording provided in "Email/Fax Cover Sheet Confidentiality Disclosure" below
Copying	No restrictions	In-house copying preferred; shred or place spoils and overruns in proprietary waste If outside copying is used, original should be returned to the company and spoils should	In-house copying required; shred spoils or overruns	In-house copying required; shred spoils or overruns

	Public/Open Data	Internal	Confidential	Restricted
		be destroyed by the supplier		
Destruction Method	Any	Shred or place in proprietary waste	Shred	Shred
Labeling	Must be explicitly labeled or defined as "public" in City's information classifications	All unlabeled information should be considered internal unless otherwise labeled or defined.	Label all electronic (Word, Excel, PowerPoint and others) and physical documents; use watermark option where possible in electronic documents	Label all electronic (Word, Excel, PowerPoint and others) and physical documents; use watermark option where possible in electronic documents

Email/Fax Cover Sheet Confidentiality Disclosure

Anytime a Department transmits Internal, Confidential, or Restricted Information it shall include the following confidentiality notice with each transmission:

"Notice: The information contained in this message is proprietary information belonging to the City of Los Angeles and/or its Proprietary Departments and is intended only for the confidential use of the addressee. If you have received this message in error, are not the addressee, an agent of the addressee, or otherwise authorized to receive this information, please delete/destroy and notify the sender immediately. Any review, dissemination, distribution or copying of the information contained in this message is strictly prohibited.

Department Guide to Determining Information Classification

Answers to the questions listed below are provided to assist information owners in properly classifying their information. Departments should rate each question using a High (H), Medium (M) or Low (L) rating scale. As a general rule, the more "High" ratings the information receives, the more restrictive the information classification should be.

Classification Question	Rating
How important is it to the City that this information be known only by authorized people?	
How important is it to the City that this data be accurate?	
How important is it to the City that this information be available to authorized people only?	
How important to regulatory guidelines compliance is this information?	
How important to privacy law compliance is this information?	
How important to regulatory compliance is this information?	
How serious would the impact be if this information reached an unintended audience?	
How likely is it that this information could be used by someone to target employees, citizens, visitors, city businesses, facilities or operations?	
How valuable would this information be to someone intent on causing harm to the City or the citizens, businesses or visitors of the City?	
How likely is it that this information could be used in conjunction with public information to cause harm to the City or its employees, citizens, businesses or visitors?	

Information Classification Guidelines Administration

All questions concerning the classification or dissemination of information should be directed to the City Attorney's Office. All questions concerning this policy should be directed to the Mayor's Office or ITPC.