

# Controlled Unclassified Information

Controlled Unclassified Information (CUI) is information created or owned by the Federal Government which requires special safeguarding, but is not classified information. At our University, we can receive CUI from federal agencies or we can develop it through the course of our work with federal proprietary information.

## **Defining CUI Data**

CUI data must be controlled and have a Nexus with the Federal Government.

- The Federal Government restricts the dissemination of CUI data by law, regulation, or government-wide policy; and the United State Government either owns or creates the data.
- The National Archives and Records Administration (NARA) is the authority on CUI and standardizes how it is marked. They also maintain the <u>CUI Registry</u>, which centralizes data management requirements.
- At UNCCH, <u>Research Compliance Services</u> and <u>ITS Security Office</u> advise on CUI management. We manage CUI carefully to protect our ability to receive federal contracts and to uphold our research integrity.

### Types of CUI, Routing & Marking CUI

CUI is has several categories and subcategories, but all CUI is either considered to be CUI Basic or CUI Specified. When appropriately labeled, all CUI documents must feature a centered banner on the cover page of documents, with either the word "CONTROLLED" OR "CUI". Use the table below to determine how to route different types of CUI at UNCCH for management.

#### **CUI Specified CUI Basic:** CUI-Basic is ONLY subject to the universal control rules set CUI-Specified is subject to BOTH the CUI-Basic controls and a forth in the Code of Federal Regulations (CFR) and NARA CUI secondary regulatory regime (such as Export Compliance Registry. It also requires correct labelling and basic CUI Regulations, HIPAA, etc.) protections. If you believe you may be working with CUI-Specified, contact: If you believe you may be working with CUI-basic, contact: Assistant Vice Chancellor for Research Security Assistant Vice Chancellor for Research Security, and ITS Security, and ITS Security. the University compliance office that manages the After marking the document's coverpage with "CUI" or secondary regulatory regime (such as Export Compliance "CONTROLLED", mark it as being "BASIC". Office or Privacy Office, etc.). After marking the document's coverpage with "CUI" or Marking /Label Example: "CONTROLLED", mark it as being "SPECIFIED" or with the **CUI BASIC** abbreviation of "SP"; use double forward slashes (//) to separate categories and subcategories. Marking / Label Example: **CUI SPECIFIED//DISSEMINATION**

#### Notes:

- If CUI interacts with <u>Public Records Requests</u>, you must also route the information to the <u>Office of University Counsel</u> and the <u>Public Records Office</u>.
- A full list of category markers is available on the <u>NARA CUI Registry</u>. Individual paragraphs can also be annotated for CUI content, but the document-level label is required.

# **Examples of CUI Data**

- Confidential Business Information (CBT), acquired through a government audit of private business.
- Personally Identifiable Information (PII) from Federal Agencies (i.e. Social Security Numbers. Passport Numbers).
- Sensitive data about critical infrastructure (i.e. energy grid documentation, water systems, national inspections).
- Federal projects subject to export compliance regulations.
- Statistical Information (i.e. Census Data).
- Taxpayer Information.

# **Identifying Unmarked CUI**

The University may receive unmarked CUI from Federal partners, or we may create CUI over the course of a project. If you receive contractual language that restricts the ability to share information, beyond normally expected confidentiality language, contact the <u>Research Compliance Services</u> and <u>ITS Security</u> for more information. The following table displays designators or contractual elements that may indicate unmarked CUI:

Туре:	Notable Language:
Clauses restricting the control of Information	Export Compliance
	National Security
	Covered Defense Information (CDI)
	For Official Use Only (FOUO)
	Sensitive but Unclassified (SBU)
	Law Enforcement Sensitive (LES)
Proprietary Information	Proprietary Business Information (PBI)
	Confidential Business Information (CBI)
Personal Information	Personally Identifiable Information (PII)
	Sensitive Personally Identifiable Information (SPII)
Operation of systems on behalf of the government	The management of work purchased by the Federal Government that do not have the ability to be published.

## **Available Resources**

- NARA: CUI Category List
- NARA: CUI Handbook
- Regulatory Reference for CUI Compliance 32 CFR Part 2002