



Policy

UNIVERSITY POLICY P-12.00 – 01/08

TO: The University of West Florida Community

FROM: Dr. John C. Cavanaugh, President

SUBJECT: Personal Identifier Policy

Responsible Office/Executive: President's Office

INTRODUCTION

The threat of identity theft has been growing at an unprecedented rate. The University of West Florida [UWF] commits to provide enhanced security for its students, faculty, staff and other persons who do business with or interact with UWF. Accordingly, the University will no longer use the Social Security Number (SSN) as the primary identifier for an individual in any University information system, business form or process, or records collection.

The collection and use of social security numbers by state agencies is restricted in accordance with Florida law. Section 119.071(5), Florida Statutes permits an agency to collect an individual's social security number where the agency is specifically authorized by law to do so or where collection of the number is imperative for the performance of the agency's duties and responsibilities as prescribed by law. Therefore, social security numbers will no longer be collected or used at UWF unless the use of the Social Security number is authorized by law or a formal exception meeting the requirements of section 119.071(5) has been approved by the President or his or her designee.

PURPOSE

The purpose of the **Personal Identifier Policy** is to:

- ◆ protect the privacy and rights of the UWF community;
- ◆ promote an understanding of the procedures used to ensure the privacy and proper handling of Social Security Numbers [SSN] and other personal information of students, prospective students, faculty, staff, alumni, and other persons officially associated with the University of West Florida;¹
- ◆ generate confidence and awareness within the UWF community that Social Security Numbers and other personal information are handled in a confidential manner; and
- ◆ establish the UWF ID as UWF's approved personal identifier number at UWF.

Beginning in October, 2007 each current member of the UWF community, including employees, students and alumni, will be assigned a UWF ID number. From that date forward, new students, employees and others will be assigned a UWF ID at the earliest possible point of contact between

¹ Certain "other persons officially associated with the University" includes alumni, Trustees, donors, Direct Support Organizations, volunteers, temporary employees of agencies who are assigned to work for UWF, and third party contractors engaged by UWF and their agents and employees.

the individual and the University. The UWF ID will be used in electronic and paper data systems to identify, track, and provide service to individuals associated with the University. It will be permanently and uniquely associated with the individual to whom it is originally assigned.

SCOPE

This policy applies to all UWF colleges, departments, administrative units, and affiliated organizations. For the purposes of this policy, affiliated organization refers to any organization associated with the University that uses university resources to create, maintain, or store data to perform its business functions.

PROVISIONS

The following are UWF **Personal Identifier Policy** provisions:

- The UWF ID will be considered the property of UWF. Its use and governance shall be at the discretion of the University, within the parameters of the law.
- Unless the University is required by law to collect an SSN or a formal exception has been approved by the President or designee, individuals will not be required to provide their SSN (exceptions include employment records, financial aid processing, other government transactions, etc.).
- Existing documents (e.g., completed forms and records) bearing the SSN will not be converted or altered; however, they must be properly secured.
- Existing templates must be modified to use the UWF ID instead of the SSN.
- Access to *records* and *record systems* containing SSN will be limited to those who have a business-related reason to know this information. Ability to view and/or report the entire SSN in a UWF system will be secured at the individual level by staff role, and approved by the Chief Information Officer (CIO).

ENFORCEMENT

Staff, faculty or student-employees who violate this Policy or fail to comply with applicable Personal Identification/ SSN Procedures are subject to disciplinary action, up to and including dismissal.

Approved By: Dr. John C. Cavanaugh, President Date: 1/13/08