

SECTION 6: OTHER PRIVACY POLICIES AND PROCEDURES

6.6 Privacy of University of Florida Identification Numbers (UFIDs)

POLICY

1. University of Florida Identification Numbers (UFIDs) are the property of the University of Florida (UF). Use and governance of these identification numbers shall be at the discretion of UF.
2. Student UFIDs are classified as Restricted Data by UF, whereas UFIDs assigned to UF employees are not. Employee UFIDs are not subject to the following restrictions.
 - a. Student UFIDs – UF classifies Student UFIDs as Non-Directory Information and are thus subject to UF's Restricted Data safeguards.
 - b. Student UFIDs are considered part of the student's "Educational Record" as defined by the FERPA, only when the number can "be used to gain access to education records. For example, only when the ID is "used in conjunction with one or more factors that authenticate the user's identity, such as a personal identification number (PIN), password or other factor known or possessed only by the authorized user" (§ 99.3 - Directory Information(c)(1)).
 - c. Student UFIDs, in whole or in part, may not be used as identifiers to publicly post or display grades or other personal student information.
 - d. Student UFIDs may be included in E-mail communications under specific conditions and for limited purposes. See 5.2 Electronic Mail for more information about emailing Restricted Data.
3. Employees, volunteers, and students may be subject to disciplinary action, up to and including termination of employment or dismissal from the University for violating this policy and/or breaching the confidentiality of UFID's. Any such disciplinary action shall be governed by the regular University policies and procedures applicable to the situation.

DEFINITIONS

1. ***E-mail***: A means or system for transmitting written messages electronically (as between terminals linked by telephone lines, cable networks, or microwave relays).
2. ***Restricted Data***: Data in any format collected, developed, maintained or managed by or on behalf of the university, or within the scope of university activities that are subject to specific protections under federal or state law or regulations or under applicable contracts. Examples include, but are not limited to medical records, social security numbers, credit card numbers, Florida driver licenses, non-directory student records and export controlled technical data. See also: <https://security.ufl.edu/faculty-staff/restricted-data/>
3. ***UFID***: Implemented on January 21, 2003, the UFID is an identifier for all University of Florida faculty, staff and students. The UFID is an eight-digit number displayed using a dash between the fourth and fifth digits as in 1234-5678.

PRIVACY REQUIREMENTS

1. The University of Florida is required to implement appropriate administrative, technical, and physical safeguards to maintain the privacy and security of Restricted Data.

2. Limited Access: Only properly authorized users will be provided access to records and record systems containing restricted data. Access is granted in accordance with the user's employment or professional responsibilities and is limited to those who have an approved business reason to use or disclose this information.
3. Record Disposal: Records containing restricted data must be disposed of in a manner that minimizes the risk of inappropriate access when those documents no longer need to be retained and pursuant to University document retention policies.
 - a. Paper documents containing restricted data should be shredded immediately, or placed in secure containers for shredding later by a licensed document destruction company.
 - b. Record systems and/or electronic media containing restricted data will be sanitized or destroyed in a manner approved by the Information Security Office prior to reuse, repurposing, or when no longer needed.
4. See Frequently Asked Questions and other information regarding UFIDs at, <http://test-apache.erp.ufl.edu/faqs/UFID.shtml>

REFERENCES

1. Title 34: Education (FERPA): § 99.3
2. Florida Statutes: 501.171 Security of confidential personal information; 817.568 Criminal use of personal identification information.
3. UF Policies: [UF Information Security Policies](#)
4. UF Regulations: 1.0103 Policies on Restricted Data; 4.007 Confidentiality of Student Records and Applicant Records

EXHIBITS

1. None