

FLORIDA STATE UNIVERSITY

# INFORMATION RISK MANAGEMENT PROGRAM

## Unit Privacy Coordinator (UPC) Tasks

Information Security & Privacy Office

March 24, 2020

Version 1.9



# **The Unit Privacy Coordinator (UPC) manages a unit's privacy program to meet university policy objectives.**

The dean, director, or department head assigns the UPC role. The person, or persons, designated with the UPC role do not need to have a technical background. Administrative staff, data owners, Principal Investigators, and coordinators are prospective candidates.

The amount of time required to fulfill UPC tasks will vary based on the complexity of the unit's information infrastructure and the information that must be secured. For example, certain unit business processes may require higher allocations of time to meet select privacy obligations such as The Health Insurance Portability and Accountability Act of 1996 (HIPAA).

This document covers the basic functions of the UPC as outlined in the FSU Information Privacy Policy 4-OP-H-12.

## **Policy Defined Tasks Include:**

- 1. Maintain the information identification and classification documentation of unit protected and private information assets.**
- 2. Assess the unit's electronic and physical controls for protected or private information to ensure they meet requirements.**
- 3. Ensure unit staff are trained on the Information Privacy Policy, and specific legislated or contracted privacy requirements.**
- 4. Ensure all unit personnel, e.g., faculty, staff, and students who handle protected or private information sign a Florida State Employee Memorandum of Understanding (or Legacy -Employee Statement of Understanding Regarding Confidentiality).**
- 5. Works with legal resources to ensure contracts and agreements stipulate adherence to FSU policy, federal and state laws, and contractual safeguarding provisions when protected or private information is collected, processed, transmitted, or stored by a third-party vendor.**

# 1. Maintain the information identification and classification documentation of unit protected and private information assets.

The UPC works with users, data owners, data custodians (IT Systems Administrators) and business/function owners to determine the classification required for data and information applications that support unit business processes. If data from enterprise systems (e.g., OMNI, Campus Solutions, Blackboard/Canvas, or building access systems) is downloaded and used locally, that data should be included in the unit inventory. Units must inventory and classify information, within their unit, to execute the assessment process in UPC Task 2.

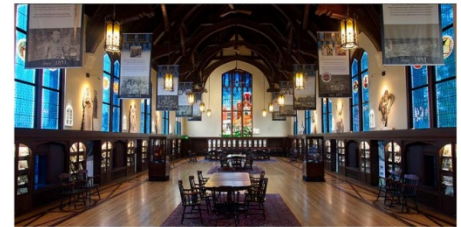
Florida State University

## INFORMATION RISK MANAGEMENT PROGRAM Information Classification Guidelines

Information Security & Privacy Office

June 12, 2017

Version 2.10



1 | Page Information Classification Guidelines March 2017

### Resources:

- A. [University Information Classification Guidelines](#) – Provides instructions for classifying different data and information items based on policy, rules, regulations, and contractual obligations.
- B. **ISPO Information Inventory Worksheet** - Excel based spreadsheet providing a standardized format to log data/information, applications, specific details concerning data/information, and assigned privacy risk to the unit should unauthorized access occur. (Available by Request)
- C. [What is a Dataset?](#) – Examples of datasets used to conduct university business.

### What is a Dataset?



Information Security and Privacy Office (ISPO)  
Risk Assessment Program  
August 2018  
Version 1.1

## **2. Assess the unit's electronic and physical controls for protected or private information to ensure they meet requirements.**

The UPC works with users, data owners, data custodians, and management to review university policy, rules/legislation, and contractual obligations against the data/information collected on the information inventory worksheet. Data owners and data custodians should compare current logical and physical controls to the appropriate legal or contractual obligations and mitigate any control gaps.

### ***Resources:***

- A. [ISPO Information Inventory Worksheet](#)
- B. [Nexpose Vulnerability Scanner \(ISPO Supported-PC/Laptop/Server/Tablet/Network Equipment\)](#)
- C. [Fluke Wireless Analyzers \(ISPO Supported-Rogue wireless detection\)](#)
- D. [University Privacy Policy / University Security Policy](#)
- E. [ISPO Risk Management Survey/Questionnaire](#)
- F. [Its.fsu.edu>ISPO>Support Resources \(links to select privacy legislation and contractual information including HIPAA, FERPA, GLBA, Human Subject Research\)](#)



### **3. Ensure unit staff are trained on the Information Privacy Policy, and specific legislated or contracted privacy requirements.**

The UPC should work with management, data owners, and systems administrators to identify and train individuals handling protected or private information. In addition, any method used to support training should allow the audit of employee completion of training tasks. Documentation may be either in an electronic or paper format. Select legal or contractual provisions may dictate the length of time these records are maintained.



#### ***Resources:***

- A. [University Information Privacy Policy](#)
- B. [University Information Security Policy](#)
- C. [ISPO Provided "Securing the Human" IT Security Awareness Video Training](#)
- D. [Federal Virtual Training Environment-Free Training](#)
- E. [FSU Registrar FERPA Information Website](#)
- F. [Florida Information Protection Act 2014 PowerPoint](#)
- G. [Office of Research-Protection of Research Subjects/Human Subjects](#)
- H. [Its.fsu.edu>ISPO>Support Resources \(links to select privacy legislation and contractual information including HIPAA, FERPA, GLBA, Human Subject Research\)](#)



## 4. Ensure all unit personnel, e.g., faculty, staff, and students who handle protected or private information sign a Florida State Employee Memorandum of Understanding (or Legacy - Employee Statement of Understanding Regarding Confidentiality).

The current Human Resources onboarding process includes the requirement of an employee to sign a Memorandum of Understanding. Legacy employees, hired prior to 2018, should have either a Confidentiality Statement on file or require the employee to sign the FSU Memorandum of Understanding form. The UPC will verify each employee handling "Protected" information has one of these documents on file.

Certain rules, laws, or legislation may require an additional employee confidentiality statement. An example is for The Health Insurance Portability and Accountability Act of 1996 (HIPAA) which requires a HIPAA confidentiality agreement not associated with the general FSU agreement.

### **Resources:**

- A. [Florida State Employee Memorandum of Understanding](#)
- B. [Local Unit Privacy/Confidentiality statement to meet legal or contractual obligation \(HIPAA, etc.\)](#)



#### FLORIDA STATE UNIVERSITY MEMORANDUM OF UNDERSTANDING

**Deduction Waiver for Debts Owed Florida State University 4-OP-D-2-J Accounts Receivable:** I understand that upon termination of employment with Florida State University, the entire balance of any and all debts owed by me to Florida State University shall be immediately due and payable at the option of the University. I authorize Florida State University upon termination of employment to withhold any and all sums necessary to satisfy outstanding debts owed by me to the University and incurred during the period of my employment.

**Employee Benefits Eligibility 4-OP-C-7-C Benefits:** For new FSU Faculty, Executive Service, A&P, or USPS employees (including those appointed in a position with temporary, emergency, or probationary status):

1. Enrollment in the State Life and/or State Health programs must be made during the first 90 days of employment.
2. Participation in the flexible benefits plan (pre-tax) is automatic unless a waiver is completed within 60 days of employment.
3. Participation in the Optional Retirement Program (ORP) or the Florida Retirement System (FRS) for all faculty, Executive Service, and A&P employees is based on eligibility outlined by Florida Statute. Participation in one of these plans is mandatory. Selection and enrollment in ORP must be completed during the first 90 days of employment. Failure to do so will result in automatic participation in the FRS.

My signature below indicates I have been advised of my options and understand the 90-day enrollment limitation, if applicable.

**OPSTemporary employees OP-C-7-H Other Personal Services (OPS):** are not covered under the Florida Retirement System. Some OPS employees (based on hours worked) may be eligible for the staff/faculty insurance group plans.

OPSTemporary employees are also eligible for:

- Enrollment in the State Deferred Compensation Annuity Program (457) and the 403(b) Tax Sheltered Annuity program.
- Mandatory enrollment in the FICA Alternative Plan (401(a)).
- Family Medical Leave in accordance with Federal and State law and FSU criteria.

**Health Coverage Options:** Basic information about the Health Insurance Marketplace Coverage and employment-based health coverage can be found at <https://www.dol.gov/sites/default/files/ebsa/laws-and-regulations/laws/affordable-care-act-for-employers-and-advisers/model-notice-for-employers-who-offer-a-health-plan-to-some-or-all-employees.pdf>. A paper version of this form can be requested by contacting (850) 644-4015.

**Discrimination and Sexual Misconduct Policies 4-OP-C-7-I Equal Opportunity and Compliance (EOC):** My signature below acknowledges receipt and review of the following University policies and statements:

- Sex Discrimination and Sexual Misconduct Policy, found at [policies.fsu.edu/sites/g/files/tpcbrn486/files/policies/president/FSU\\_Policy\\_2-2.pdf](http://policies.fsu.edu/sites/g/files/tpcbrn486/files/policies/president/FSU_Policy_2-2.pdf)
- Title IX Statement, found at <http://titleix.fsu.edu/title-ix>
- Non-Discrimination Policy, found at <http://policies.vpfa.fsu.edu/policies-and-procedures/faculty-staff/equal-opportunity-and-compliance-eoc#13>
- Americans with Disabilities Act (ADA) Policy, found at <http://policies.vpfa.fsu.edu/policies-and-procedures/faculty-staff/equal-opportunity-and-compliance-eoc#11>

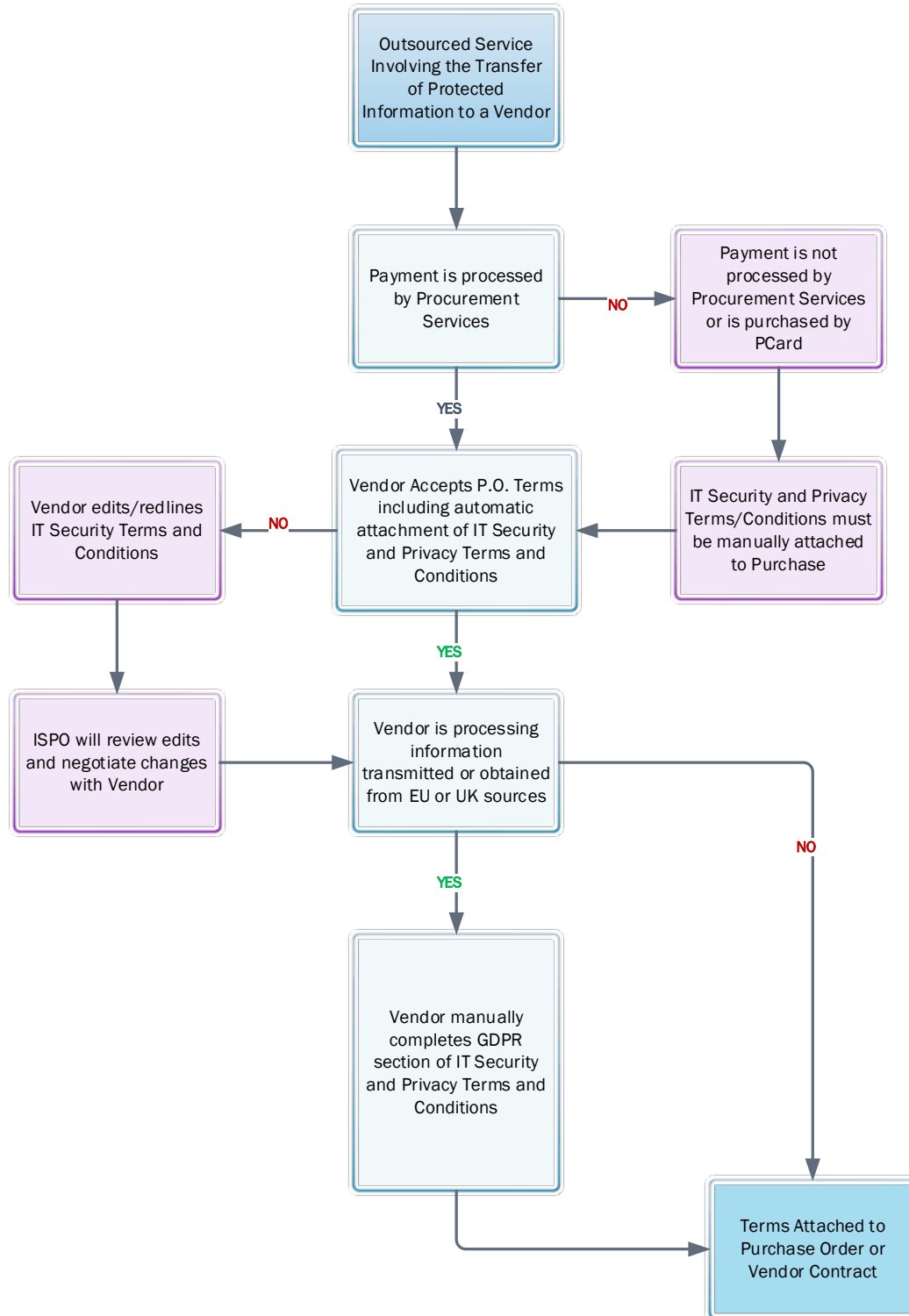
**Direct Deposit Condition of Employment 4-OP-D-2-E Payroll:** As an FSU employee, the use of direct deposit for payroll checks is a condition of employment. Once implemented, the employee's direct deposit information will remain in effect until changed by: (a) the employee, either through employee self-service or in writing; (b) the employee's legal representative, in case of legal incapacity; (c) the financial institution; or (d) Florida State University.

**Workers' Compensation Program Guidelines 4-OP-G-10 Insurance, Risk Management and Workers' Compensation:** I have read the Florida State University rules relative to workers' compensation and understand that all injuries must be reported immediately to my supervisor. I am to obtain authorization from Amerisys should I require any medical treatment unless the need for treatment is an emergency at which time 911 will be called immediately and Amerisys notified. All absences from work must be documented by an authorized physician and I must provide written documentation to my supervisor/department following each medical treatment. Where applicable, my department will work to provide light duty options. I must keep all medical appointments and obtain full duty clearance before returning to my normally scheduled job duties. If I am injured at work or become aware of a workers' compensation injury or illness, I have 30 days in which to report my injury or illness to my employer. Failure to report my injury within 30 days may jeopardize my claim. I have two years from the date of my injury or illness to file a claim for workers' compensation benefits. Failure to report my injury or illness within 30 days may be used as a defense against my claim regardless of the two-year statute of limitations for filing a claim. My eligibility for benefits may also be eliminated one year from the date I last received a wage replacement check or approved medical treatment.

My signature below acknowledges receipt of the Workers' Compensation information for Florida Workers, found at [http://www.myfloridacfo.com/division/wc/pdf/information\\_brochure\\_for\\_injured\\_workers\\_ENG\\_print.pdf](http://www.myfloridacfo.com/division/wc/pdf/information_brochure_for_injured_workers_ENG_print.pdf).

**USPS and A&P Employees Handbook:** My signature below acknowledges receipt of the "FSU and You" employee

**5. Works with legal resources to ensure contracts and agreements stipulate adherence to FSU policy, federal and state laws, and contractual safeguarding provisions when protected or private information is collected, processed, transmitted, or stored by a third-party vendor.**



***Resources:***

- A. [Contract Addendum for University Sharing of any Information Classified as Protected and Private with a 3rd Party Vendor or Service Provider.](#)