



Approved By: President's Cabinet
Effective Date: January 5, 2009

Category: General College
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Social Security Number Policy

PROFILE

Social Security Numbers are highly confidential and legally protected data. Geneseo is committed to protecting the privacy and legal rights of its community members and to protecting community members from identity theft, one of the fastest-growing crimes.

Legal Requirements: Collection, Use, Dissemination and Breach of Social Security Numbers

Federal Privacy Act of 1974

"It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number."

Exceptions

- To comply with another Federal law
- For a computer system in place prior to 1975

In addition, all government agencies must provide a disclosure statement every time they ask for a Social Security Number. That is, whenever a Social Security Number is requested, the electronic or physical form used to collect the number must be clearly marked as to

- whether the request is voluntary or mandatory.
- what authority or legal statute the number is solicited.
- what uses will be made of the Social Security Number.
- the consequences, if any, of failure to provide the information.

FERPA

FERPA protects the privacy of student educational records and requires schools to minimize collection and use of student Social Security Numbers. Social Security Numbers should be collected only for the purpose of processing student loans, employment, and to meet other legal obligations.

NY State Law: Chapter 16, Article 1, Title 1, Section 2b

"Institutions shall not display student Social Security Numbers on public listings of grades, class rosters, student ID cards, student directories, or anything else unless specifically authorized or required by law."

NY State Information Security Breach and Notification Act

Requires the timely notification to citizens regarding any breach of a system containing non-encrypted personal information "in the most expedient time possible and without unreasonable delay."

Policy Purpose

- To protect the privacy and legal rights of the members of the College community.
- To generate broad awareness of the confidential nature of the Social Security Number.
- To reduce the use of the Social Security Number (including partial SSN) for identification purposes.
- To promote confidence by students and employees that Social Security Numbers are handled in a confidential manner.

POLICY

It is the policy at Geneseo that the use of the Social Security Number as a common identifier and the primary key to databases be discontinued, except where required for employment, financial aid, and a limited number of other business transactions.

Disclosure statements will be provided whenever a Social Security Number is requested, in compliance with the Federal Privacy Act of 1974.

TIMEFRAME FOR POLICY IMPLEMENTATION

A phased-in implementation of this policy is needed, since many business processes at the College are currently using Social Security Numbers as key identifiers. Conversion of these systems is needed without causing serious disruptions in College business. A plan for a steady and purposeful movement away from dependency on Social Security Numbers will be developed. Geneseo departments have begun work on reducing the availability and use of personally identifiable information such as the SSN.

Our goal is to discontinue the use of Social Security Numbers as a common identifier and primary key to database except where required for employment, financial aid, and a limited number of other business transactions as soon as possible. An inventory of SSN use is currently being compiled and will be completed by December 31, 2008. Departments must make changes in their use of SSN to be compliant with this policy by July 1, 2009. For more complicated situations where the July 1, 2009 date is unreasonable, an action plan must be in place by July 1, 2009 that provides a timeline and plan for how future compliance will be achieved. As of this date, data custodians will be responsible for maintaining the privacy and confidentiality of SSNs on their business processes as mandated by law.

PROCEDURE

1. Control and approval of the use of Social Security Number in any electronic system or form is assigned to the Information Security team. Social Security Numbers should be collected only for the purpose of processing student loans, employment, and to meet other legal obligations. The collection, use and dissemination of student SSNs or any part thereof for other purposes is strongly discouraged. For SSN access in Banner, a director or department head must submit a *Banner Social Security Number Access Request Form*. To request approval to use SSN on any other electronic system or to request SSN on a form (electronic or paper), a director or department head must submit a *Social Security Number Request to Use Form*. All forms are available on the ISEC web site at http://www.geneseo.edu/info_security.
2. A Geneseo ID Number will be assigned to all students, employees, and associated individuals at the earliest point possible in the individual's contact and association with the College. The Geneseo ID Number replaces the Social Security Number as the preferred common, unique identifier and key to Geneseo databases. Where possible, the Geneseo ID Number will be used in all future electronic and paper data systems to identify, track, and service individuals associated with the College.
3. All forms on which persons are **required** to provide Social Security Numbers must now contain or have appended to them a statement explaining the College request; e.g., the legal obligation on which the request is based, if there is one and the use that will be made of the Social Security Number.

For example, on an employment form, the following text can be used: *The Federal Privacy Act of 1974 requires that you be notified that disclosure of your Social Security Number is required pursuant to the Internal Revenue Service Code. The Social Security Number is required to verify your identity.*

If the Social Security Number is not **required**, but **requested**, the fact that supplying it is voluntary should be noted and the option of assigning a temporary, "dummy number" should be offered.

For example, when SSN is voluntary, the following text may be used: *The Federal Privacy Act of 1974*

requires that you be notified that disclosure of your Social Security Number is voluntary and not required on this form. If you do not choose to disclose your Social Security Number, a temporary identification number will be generated for you.

If the Social Security Number is **not mandated** by law, but is **needed for a business purpose**, e.g., in the early stages of the admissions process (e.g., to match standardized test scores such as SATs, ACTs, etc.), a disclosure statement of the following form may be used: *The Federal Privacy Act of 1974 requires that you be notified that disclosure of your Social Security Number is not mandated by law, however, failure to do so may delay or even prevent your enrollment. The College uses your Social Security Number to match your application with your standardized test scores.*

4. Except where the College is legally required to collect a Social Security Number, individuals will not be required to provide their Social Security Number, verbally or in writing, at any *point of service*, nor will they be denied access to those services should they refuse to provide a Social Security Number. However, individuals may volunteer their Social Security Number, if they wish, if the primary means for identification is unavailable.
5. Social Security Numbers will be stored as a confidential attribute associated with an individual. They will be used as allowed and mandated by law.
6. Social Security Numbers will not be publicly displayed on any list or roster.
7. Encryption of Social Security Numbers is required between server and client workstations and whenever data are transmitted over public unsecured networks. Web applications transmitting SSN must use https encryption.
8. Paper and electronic documents containing Social Security Numbers will be handled, used, and disposed of in a proper fashion. Proper disposal is defined as any method that shreds the record before the disposal of the record; or destroys the personal identifying information contained in the record; or modifies the record to make the personal identifying information unreadable; or takes actions consistent with commonly accepted industry practices to ensure that no unauthorized person will have access to the personal identifying information contained in the record. For more information on handling private information, view the *Information Security Best Practices* document available at http://www.geneseo.edu/info_security/best_practices.
9. Records or reports containing SSNs or other confidential information will not be downloaded or stored on College or personal computers or other electronic devices that are not secured against unauthorized access, in compliance with Geneseo's policy on *Network Connected Devices* available at http://www.geneseo.edu/isu/cms_pdf/cit/NetDevices.pdf.
10. Social Security Numbers will be released by the College to entities outside the College only as allowed by law, when the individual grants permission, when the external entity is acting as the College's contractor or agent and adequate security measures are in place to prevent unauthorized dissemination to third parties or when Legal Counsel has approved the release.
11. Social Security Number breaches will be immediately reported to the Chair of the Information Security Program Team.

COMPLIANCE

An employee or student who has substantially breached the confidentiality of Social Security Numbers will be subject to disciplinary action or sanctions up to and including discharge and dismissal in accordance with College policy and procedures.

Violation may also result in criminal prosecution. It is a felony, punishable by up to 5 years in prison, to compel a person to provide a Social Security Number in violation of Federal Law.