

3359-11-10.6 Social security number use policy.

(A) Introduction.

be assigned at the earliest possible point of contact between the individual and the university. The ID shall be used as the campus ID Card identifier and shall be used in all future electronic systems and on paper documents to identify, track, and provide service to individuals associated with the university. It shall be permanently associated with the individual to whom it is originally assigned. The ID shall be jointly maintained and administered by the registrar, department of residence and the division of information technology services (ITS).

- (2) Personal information shall not be publicly posted or displayed in a manner where either the university ID or the social security number identifies the individual associated with the information.
- (3) Encryption of social security numbers is required between server and client workstations and whenever data is transmitted over unsecured networks.
- (4) All documents (paper and electronic) and any storage media containing social security numbers shall be disposed of in a timely and secure fashion consistent with the university's record retention policy.
- (5) Except in those cases where the university is required to collect a social security number, individuals shall not be required to provide their social security number, verbally or in writing, at any point of service, nor shall they be denied access to those services should they refuse to provide a social security number. Individuals may volunteer their social security number if they wish, however, as an alternate means of locating a record.
- (6) The university shall release social security numbers to entities outside the university (contractors, vendors, service providers) as allowed by law or when the individual grants such permission. University contracts with outside entities shall include, if relevant, language identifying the responsibility and restrictions on the use of social security numbers by the third party.
- (7) Social security numbers may continue to be stored as a confidential attribute associated with an individual. The social security number shall be used as allowed by law; and as an optional key to identify individuals for whom an ID is not known.
- (8) The university division of finance and administration shall assign an existing administrator to oversee social security number use relating to employees and other individuals (anyone other than students, prospective students, parents, and alumni) associated with the university. The division of student affairs shall assign an existing administrator to oversee social security number use relating to students, prospective students, parents and alumni.

- (9) All university forms and documents that request social security numbers shall include an approved disclosure statement, and shall indicate whether the request is voluntary or mandatory. Existing forms and documents shall be modified as they are reprinted. Approved stat

(F) Compliance.

- (1) Compliance with this policy shall be attained through a phased approach. The goal is to attain complete compliance with this policy within three years of its adoption.
- (2) The information technology security officer (ITSO) shall be responsible for monitoring compliance with this policy.
- (3) The university ITSO shall, on annual basis, or sooner if deemed necessary, review the use of social security numbers by all university units. Social security number use will be restricted to functions where such use is deemed necessary by the ITSPC. University units will be responsible to inform the ITSO, in writing, of the need to use or release social security numbers. University units that are denied use of social security numbers may appeal to the vice president for finance and administration, in writing, for permission to use social security numbers.

(G) Enforcement.

An employee or student who knowingly violates this policy and/or in any way breaches the confidentiality of social security numbers may be subject to appropriate disciplinary action or sanctions.

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