SOCIAL SECURITY NUMBER PRIVACY POLICY

SLT 10.6

Date of Last Update:
July 31, 2008

Approved By:

- Senior Leadership Team

Responsible Office:
Office of General Counsel

POLICY STATEMENT

1. **Applicability** This policy applies to all members of the GVSU community including faculty, staff and students.

2. **Access to Social Security Numbers.** GVSU restricts access to information or documents containing social security numbers to members of the GVSU community who have a legitimate university business reason to access such information or documents. The heads of departments having access to records containing social security numbers shall determine which other personnel within their departments have a legitimate reason in the University's ordinary course of business to have access to such social security numbers. Personnel using such records containing Social Security Numbers must take appropriate steps to secure such records when not in immediate use.

3. **Confidentiality of Social Security Numbers**. Members of the GVSU community shall maintain the confidentiality of university information or documents containing social security numbers consistent with the law and this policy. No person shall knowingly obtain, store, transfer, use, disclose, or dispose of social security numbers except in accordance with the law and this policy.

4. **Obtaining Social Security Numbers**. Social security numbers should be collected only where required or permitted by federal and state law or for legitimate university business reasons consistent with law and policy.

5. **Public Display**. No more than four sequential digits of a social security number shall be

on public display. Public display means to post, make visible, or set out for open view to members of the public or in a public manner. This includes open view on a computer screen or device.

6. **Account Numbers**. As of the effective date of this policy, GVSU has undertaken a systematic process to eliminate social security numbers as identification numbers for all current members of the GVSU community. Once assigned an alternative identification number, neither the University nor the individual may return to the use of a social security number as an identification number for that person.

7. **Mailed Documents**. Documents containing more than four sequential digits of a social security number shall only be sent by mail in cases where state or federal law, rule, regulation, or court order or rule authorizes, permits or requires that a Social Security number appear in the document, the document is sent as part of an application or enrollment process initiated by the individual, at the request of or with the permission of the individual, their parent or guardian, or with regard to an employee or heath insurance benefit. Documents containing more than four sequential digits of a social security number, that are properly sent through the mail, shall not reveal the number through the envelope window or otherwise be visible from the outside of the envelope or package. Mail includes delivery by regular US mail, campus mail, or any other delivery service that does not require the signature of the recipient indicating actual receipt.

8. **Freedom of Information Act Requests**. Where more than four sequential digits of a social security number are contained within a document subject to release under the Freedom of Information Act, the social security number shall be redacted or otherwise rendered unreadable before the document or copy of the document is disclosed. Any request for disclosure of documents under the Freedom of Information Act shall be first referred to the Division of Legal, Compliance and Risk Management.

9. **Storage of Documents**. All documents containing social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

10. **Disposal of Documents**. Documents containing social security numbers will be retained in accordance with the requirements of state and federal law and consistent with the legitimate business needs of GVSU. At such time as documents containing social security numbers may be disposed of, such disposal shall be accomplished in a manner

that protects the confidentiality of the Social Security numbers, such as by shredding.

11. **Unauthorized Use or Disclosure of Social Security Numbers**. GVSU shall take reasonable measures to enforce this Privacy Policy and to correct and prevent the reoccurrence of any known violations. Anyone who knowingly obtains, uses or discloses social security numbers for unlawful purposes or contrary to the requirements of this policy, state or federal law, shall be subject to discipline up to and including discharge for employees or expulsion for students consistent with existing disciplinary policies. Additionally, certain violations of the Act carry criminal and/or civil sanctions. GVSU will cooperate with the appropriate law enforcement or administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses or discloses Social Security numbers for unlawful purposes.

12. **Lawful and Required Use.** Nothing in this policy is designed to prohibit the collection, retention or transmission of documents or records containing Social Security numbers as required or permitted by state or federal law, rule or regulation, at the request of or with permission of the individual, for administrative use in the ordinary course of business to verify identity, to pursue legal rights of GVSU, or to provide or administer employee benefits such as health or retirement benefits.