Social Security Number Policy

Approved by: Northeastern State University Executive Cabinet

Responsible Official: Legal Counsel
(918) 444-2008

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Additional References:
Privacy Act of 1974 (P.L. 93-579)

PURPOSE

To establish a policy with regard to the University's collection, maintenance, and distribution of students, faculty and staff Social Security Numbers and to ensure compliance with federal, state and local law.

PROCEDURE

A N number shall be assigned to students and employees. The N number shalt be assigned at the earliest possible point of contact between the individual and the University. The N number 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 to provide service to individuals associated with the University. It shall be permanently associated with the individual to whom it is originally assigned.

Personal information shall not be publicly posted or displayed in a manner where either the N number or the Social Security Number identifies the individual associated with the information.

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 as means of locating a record, document, etc. Alternatively, if electing not to provide a Social Security Number, an individual may be required to provide other identifying information necessary as a means of locating a record, document, etc.

The University shall release Social Security Numbers to entities outside the University (contractors, vendors, service providers, collection agencies, etc.) when required for certain legal and business activities.

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 alternative identification number is not known or has not yet been assigned.

Formal and informal documents which contain Social Security Numbers shall be maintained for the minimum period of time necessary or as required by the Oklahoma General Records Disposition Schedule for State Colleges and Universities. Such documents shall be maintained in a secure manner. Upon reaching the end of the required period, the document must be destroyed pursuant to the Oklahoma General Records Disposition Schedule for State Colleges and Universities.

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DISCLOSURE STATEMENT

The <u>Privacy Act of 1974 (P.L. 93-579)</u> limits the circumstances under which governmental agencies may request social security numbers from individuals.

Whenever a University department designs a form that directly solicits a social security number from an individual, the form is to display a statement explaining whether the disclosure of the social security number is mandatory or voluntary.

Federal statutes and regulations that mandate or authorize the use of social security numbers is attached in Appendix I.

DISCLOSURE WORDING

Please use the following disclosure notice wording for forms requesting social security numbers directly from individuals:

Mandatory Disclosure:

NSU requires disclosure of your social security number on this form. The authority for this mandatory disclosure is found in Appendix I.

Voluntary Disclosure:

It is unlawful for NSU to deny any individual any right, benefit, or privilege provided by law because the individual refuses to disclose his or her social security number except in limited circumstances. NSU requests the voluntary disclosure of your social security number on this form, if provided, NSU will use your Social Security Number for the authorized uses found in Appendix I.

COMPUTING AND TELECOMMUNICATIONS

At no time should a Social Security Number Identifying a specific person (or persons) be transmitted in an unsecured manner within the body or subject line of an email by any employee of the University. Information Technology Services have developed a set of standards and guidelines addressing the handling of Social Security Numbers in electronic systems. Adherence to these guidelines in all future development shall be considered a requirement of this policy statement.

VIOLATION

Any 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 pursuant to NSU and RUSO (Regional University System of Oklahoma) policies and procedures as well as state and federal law.

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