

Social Security Number Privacy Policy

Introduction

Marist College recognizes the importance of maintaining the privacy of our community members and the confidentiality of each individual's personal information; therefore, the College has implemented a campus wide identification system (CWID) for students, faculty, staff, and other individuals associated with the College. This system increases protection against identity theft and enhances individual privacy.

The key objective of the CWID system is to eliminate the use of the Social Security number (SSN) as an individual identifier in the College's administrative systems and records. While the College cannot completely eliminate the use of SSNs due to state and federal reporting requirements, Marist will ensure that individuals and organizational units are in complete compliance with our stringent protection measures.

This policy applies to all individuals and organizational units that collect, have access to, or use an individual's SSN.

Policy

It is the policy of Marist College that the SSN will not be used as the primary identifier or key in any new or existing college systems or databases unless required by law or to meet the institutional obligations that have been approved by the Academic Vice President or the President.

The following safeguards are to be implemented:

- Access to Social Security numbers will only be given to those employees or departments that demonstrated a legitimate business and/or legal need verified through the completion of the SSN Authorization Process. Contact the _____ department for authorization procedures.
- Social Security number data must be physically and technologically secured. This includes:
 - Printed reports and spreadsheets
 - PCs and Servers
 - Boot up passwords
 - Security software
 - Automatic drive overwrite
 - Online screens
 - Downloadable files
 - Portable storage devices
 - Laptops
 - CDs
 - Floppies
 - Pen drives or memory sticks
- All college forms will include only references to CWID, unless collection of SSN is required by law, such as Financial Aid, Payroll, and Human Resources.
- Employees must ask for the CWID, NOT the Social Security number, as proof of identity from an individual.
- SSNs will not be shared with any vendor or non-Marist employee.
- Any transmission of data that contains SSN will be encrypted both at the file level and during transmission. This includes any data feeds to systems outside of the college's Administrative systems.

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- Employees must immediately report any inappropriate disclosure of a SSN to their supervisor. The supervisor will report the disclosure to the IT Security Officer.
- Student's CWID must never be publicly posted, displayed or, in any other way, distributed, i.e. posting grades, leaving papers or tests with the CWID on the front table of the classroom or outside an office, etc.
- Print documents and disposable media, such as CDs and floppies, must be shredded or otherwise destroyed before disposal.

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Issues Related to SSN Privacy Policy

Questions

- Who handles the Authorization process? Where is the process documented?
- Is this policy retroactive? If so, how far back and what type of data, i.e. print, electronic, or both?
- Must students give their SSN to admissions and the college at large (excluding mandatory use, i.e. financial aid)?
 - “Individuals may not required to give their SSN unless specific to a Federal or State statute. Agencies may not deny any right, benefit or privilege to any individual because of their refusal to disclose their SSN. It is incumbent on the institution to inform the individual whether the disclosure is mandatory or voluntary, by what statute or other authority, and what uses will be made of the social security number.” (MGC)

Need

- Policy regarding privacy of CWID, i.e. public display of grades or papers.
 - “Grades and other pieces of personal information will not be publicly posted or displayed in a manner where use of all or part of the CWID or SSN (including use of the last few digits of the SSN) identifies the individual associated with the information” (BSU)
 - “Please alert _____ if your CWID is being used to post grades” (CO)
- Add reference to FERPA regulations and college confidentiality policy.
- FAQ page