

JAMES A. RHODES STATE COLLEGE
HUMAN RESOURCES POLICY STATEMENT

This policy and/or procedure provides operating principles for Human Resources issues at James A. Rhodes State College. It supersedes any prior policy covering the specific subject. This policy and/or procedure may be suspended, modified or cancelled as determined by the College. This policy and/or procedure does not create a contract of employment, nor is it a condition of employment between the College and its employees.

This policy and/or procedure is provided on-line for the convenience of access for College employees. It is created in WordPerfect and is in “read-only” format. The file can be opened, reviewed and/or printed for reference. The original policy will be the governing copy and is on file in Human Resources.

(Specific Policy Follows on Next Page)

SOCIAL SECURITY NUMBER POLICY

Policy 5.14
BOT 5-17-07

Applies to: Faculty, Staff and Students

Purpose

The Federal Privacy Act of 1974 and amendments establish guidelines under which any state agency may request SSNs from individuals. Individuals may not be 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 College 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 SSN [Public Law 93-579, 5 U.S.C. 552e, Section 7(a)(1), (a)(2), (b)].

The SSN was not designed to serve as a universal identification mechanism. Casual use of the SSN has led to the escalation of the crime of identity theft. With the SSN accessible to so many people, it is possible for someone to fraudulently use an individual's SSN to assume another identity and gain access to financial and other personal information, risking an individual's personal credit and confidentiality. For many years, the SSN has been used as an identification number in many computer systems; giving access to private information and allowing an easy way to link database information. Federal Privacy Act compliance serves as a deterrent to identity theft and its consequences. It is the intent of the College to take the necessary precautions to protect the identity of all of its constituents.

A. Oversight

1. The President will assign to the College Executive Staff the responsibility of SSN oversight within their respective areas, serving as the SSN Compliance Administrators. The Compliance Administrators control the use of the SSN and approval will be required from them, in collaboration with the President, to use the SSN in any new electronic system or on any College form. Specific responsibilities are spelled out in the Phased-In Compliance section found in the Appendix. The College Executive Staff will represent the College and provide an institutional perspective to all employees.
2. Each Compliance Administrator will have the responsibility to:
 - a. Oversee and ensure the implementation of this policy statement;
 - b. Provide support, guidance, and problem resolution for offices working with SSNs;
 - c. Serve as an intermediary between campus units and College legal Counsel when an opinion on the release or exchange of SSNs is required;
 - d. Maintain a list of entities, approved by Legal Counsel, to which SSNs may be released;
 - e. Coordinate with the other SSN Compliance Administrators to create an electronic system to function as the central distribution mechanism for information pertaining to SSN usage at the College;
 - f. Coordinate with the other SSN compliance administrators to produce a College-wide educational program to train employees on the handling of SSNs and make students aware of their rights and responsibilities with regard to SSNs; and
 - g. Meet regularly to resolve differences in implementation procedure to ensure uniformity across the College in implementation details, and adherence to the policy.
3. Information Systems (IS) in conjunction with the College's SSN Compliance Administrator will, as part of its data management strategy, develop a set of guidelines addressing the handling of SSNs in electronic systems. Adherence to these guidelines in all future developments will be considered a requirement of this policy statement. These guidelines will explicitly address:
 - a. The display of SSNs on computer terminals, screens, and reports;
 - b. The security protocol required to access SSNs when they are included in part of an electronic database;
 - c. Alternate mechanisms for integrating data other than the use of SSNs;
 - d. The legal requirement to maintain confidentiality of the SSNs imposed by the Family Educational Rights and Privacy Act and the Privacy Act of 1974;
 - e. Obtaining permission to include the SSN in a system from the designated Compliance Administrator (section A.1.).

B. Unique Identification Number

1. A unique identification number (UIN) will be assigned to all Rhodes State students, employees, and other associated individuals, such as contractors or consultants. The UIN (hereinafter identified as RHODES ID) will be assigned at the earliest possible point of contact between the individual and the College.
 - a. The RHODES ID will be considered the property of the Rhodes State College, and its use and governance shall be at the discretion of the College, within the parameters of the law;
 - b. The RHODES ID will be maintained and administered in accordance with the Rhodes State College policy guidelines on the Unique Identification Number;
 - c. The RHODES ID will be a component of a system that provides a mechanism for both the public identification of individuals and a method of authentication; and
 - d. All services rendered by Rhodes State College and through its electronic administrative business systems will rely on the identification and authentication services provided by this system.

C. Collection and Release of SSN

1. Except where the College is legally required to collect a SSN, individuals will not be required to provide their SSN, verbally or in writing, at any point of service, nor will they be denied access to those services should they refuse to provide a SSN. However, individuals may volunteer their SSN if they wish as an alternate means of locating a record.
2. SSNs will only be required from students, employees and individuals with the College in circumstances where the collection is mandated by a government agency.
3. All College forms and documents that collect SSNs will use the language included in D.2 and sections I.A and II.A in the appendix. These sections will indicate whether the request is voluntary or mandatory.
4. Forms and documents will be modified on an as reprinted basis with full compliance by Fall 2008.
5. Paper and electronic documents containing SSNs will be disposed of in a secure fashion.
6. SSNs will be electronically transmitted only through encrypted mechanisms.
7. SSNs will be released by the College to entities outside the College only
 - a. As allowed by law;
 - b. When permission is granted by the individual;
 - c. 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; and
 - d. When Legal Counsel has approved the release.
8. The SSN Compliance Administrators (see A.1.) will maintain the list of approved entities referred to in C.7.
9. The SSNs may continue to be stored as a confidential attribute associated with an individual. The SSN will be used as
 - a. Allowed by law;
 - b. A key to identify individuals for whom a RHODES ID is not known.
10. Grades and other pieces of personal information will not be publicly posted or displayed in a manner where either the RHODES ID or SSN identifies the individual associated with the information.
11. This policy does not preclude, if a primary means of identification is unavailable, Rhodes State College employees from using the SSN as needed during the execution of their duties. The other aspects of this policy statement bind such usage.
12. SSNs collected by Rhodes State College may be used in a variety of ways, such as but not limited to the following:
 - a. To identify such student records as applications for admission, registration related documents, grade reports, transcript and certification requests, medical immunization records, student financial records, financial aid records, and permanent academic records;

- b. To determine eligibility, certify school attendance, and report student status;
- c. To use as an identifier for grants, loans, and other financial aid programs; and
- d. To identify and track employment or medical records.

D. Disclosure Statements

1. As an example, all College forms and documents that collect SSNs will require the use of a disclosure statement. The statements listed in the appendix will be used. It is understood that this language will be implemented on an 'as reprinted' basis for existing paperwork, with a full compliance date of Fall 2008. If situations arise in which the following statements are not appropriate, the Compliance Administrators described in section A.1 will work with Legal Counsel to provide an appropriate alternative statement.
2. Admissions Application Disclosure Statement
 - a. Social Security Number: We are requesting your Social Security Number (SSN) pursuant to Public Law 93-579 for the College's system of student records as well as for compliance with federal and state reporting requirements. A SSN is required if you are applying for financial aid but is not required for admission to the College. The SSN will not be used as the student ID number, but providing a SSN will speed up the processing of your application. Supplying a SSN ensures that you or your parents will be able to claim educational tax credits, if eligible, on you Federal or State tax returns, enable certification of Veterans benefits, and enable the College to provide the information to entities requiring the SSN, including, but not limited to the federal government for financial aid, internal revenue service for tax credits, Immigration and Naturalization Service, and Ohio Board of Regents for audit reporting purposes. The College has a strong commitment to ensuring your privacy and confidentiality of student records and will not disclose your SSN without your consent for any purpose except as required by law or for Federal and State reporting.

E. Policy Enforcement

1. The SSN Compliance Administrators (section A.1.) will be responsible for monitoring compliance with this policy.
 - a. During the implementation of this policy the SSN Compliance Administrators (section A.1.) will jointly produce a biennial report describing the state of adherence to this policy statement, to be presented to the President.
2. An employee or student who has substantially breached the confidentiality of SSNs may be subject to disciplinary action or sanctions up to and including discharge or dismissal in accordance with College policy and procedures.

F. Definitions

1. FERPA: Family Educational Rights and Privacy Act.
2. Phased-in Compliance Strategy: A strategy that attempts to define a multi-tiered approach to achieving compliance.
3. Point of Services: A physical or electronic interaction between the College and either its employees, students or other individuals, during which the College provides physical, educational, informational, or electronic services to the individual.
4. Secure Fashion: In the context of the destruction of paper and electronic documents, this refers to a method that defeats both casual and deliberate attempts at theft, e.g., the shredding of documents containing SSNs and the use of 'confidential' recycling bins. For electronic documents this refers to explicit deletion or storage on an electronic device protected by a password based security system.

APPENDIX

I. Student Forms Disclosure Statement

- A. Use of Student SSNs: Furnishing a SSN is voluntary and not required for enrollment. However, Rhodes State College is required by federal law to report to the Internal Revenue Service (IRS). Federal law also requires the College to obtain and report to the IRS the SSN for any person to whom compensation is paid. Failure to provide such information may delay or even prevent your enrollment. The College will not disclose a SSN for any purpose not required by law or as mandated for Federal and State Reporting, without the consent of the student.

II. Employee Forms Disclosure Statement

- A. Use of Employee SSNs: Rhodes State College is required by federal law to report income along with SSNs for all employees to whom compensation is paid. Employee SSNs are maintained and used by the College for payroll, reporting and benefits purposes and are reported to federal and state agencies in formats required by law or for benefits purposes. The College will not disclose an employee's SSN without the consent of the employee to anyone outside the College except as mandated by law or required for benefit purposes.

III. General Statement for Student Handbooks and Electronic Forms

- A. Rhodes State College is committed to protecting the privacy of its students, employees, and alumni, as well as other individuals associated with the College. At times the College will ask you for your Social Security Number (SSN). Federal and state law requires the collection of your SSN for certain purposes such as those relating to employment and student loans. Whenever your SSN is requested the electronic or physical form used to collect your SSN will be clearly marked as to whether this request is voluntary or mandatory.
- B. Why does the Rhodes State College ask for your SSN when it isn't mandatory, such as at enrollment? The College is required by the IRS to supply them with the name, address, and SSN of every tuition-paying student. The IRS relies on these lists to certify education related tax credits. The College cannot provide the IRS with this information without a valid SSN. Consequently, if you intend to take advantage of any education related deductions it is important that Rhodes State College have a valid SSN for you.
- C. Further, the College is required to have a valid SSN before an individual can be entered into any business system involving financial transactions. Thus, without your SSN the College cannot grant, waiver, or provide employment. Providing the College with your SSN in advance is the safest way to ensure that these services are available with the least delay.
- D. Finally, many of the College's records storage systems and legacy computer systems (those built before the creation of the RHODES ID) rely on the SSN to track a student's academic and financial records. Supplying a valid SSN helps the College maintain these records as accurately as possible.

IV. Phased-In Compliance

- A. Rhodes State College will adopt a phase-in compliance strategy with the goal of attaining complete compliance with this policy statement within two years (Spring 2009) of its adoption (May, 2007).
 1. Phase I generally consists of approving this policy, creating responsible roles, educating College personnel about SSN collection and usage. Specifically phase I is the implementation or adoption of and the policy statement, definitions, and initial implementation of sections A.1, A.2, C.1, C.2, C.5 – C.12, D.2, E.1, E.2 and appendix I.A, and II.A, B, C and D.
 2. Phase II prioritizes systems, points of services, documents out of compliance, and begins remediation or replacing these. Specifically phase II includes the definition and development of the infrastructure necessary to implement all sections of the policy.
 3. Phase III completes remediation or replacement of systems out of compliance, and monitors and supports existing or developing systems and procedures. Phase III will be complete when every section of this policy statement has been implemented or adopted, with a completion date of Fall 2008.