

5.2 SOCIAL SECURITY NUMBER USAGE

Original Date of Issue: 12/20/06
Revised:

1. Purpose

Delaware County Community College recognizes that it collects and maintains confidential information relating to its students, employees, and individuals associated with the College and is dedicated to ensuring the privacy and proper handling of this confidential information. The primary purpose of this Social Security number policy is to ensure that the necessary procedures and awareness exist to guarantee that the College complies with both the letter and spirit of the Family Educational Rights and Privacy Act, and the Privacy Act of 1974. The College is guided by the following objectives:

- Broad awareness of the confidential nature of the Social Security number;
- Reduced reliance upon the Social Security number for identification purposes;
- A consistent policy towards and treatment of Social Security numbers throughout the College; and
- A consistent policy towards and treatment of Social Security numbers throughout the College.

2. Definitions

FERPA – Family Educational Rights and Privacy Act

DCCCID – Delaware County Community College Identification Number is a permanent and unique identification number associated with the individual to whom it is originally assigned.

3. Procedure

A College-wide Identification Number (DCCCID) will be assigned to all students, employees, and other individuals associated with the College. This DCCCID will be assigned at the earliest possible point of contact between the individual and the College. The DCCCID will be used in all electronic and paper data systems to identify, track, and service individuals associated with the College. It will be permanently and uniquely associated with the individual to whom it is assigned.

Social Security numbers may not be displayed on materials or documents that would be widely viewed by others, such as identification cards, time cards, employee rosters, student rosters, bulletin board postings, grade postings, and other materials.

All College forms and documents that collect Social Security numbers will use the language included below:

- **Student**
Use of Student Social Security Numbers: Delaware County Community College is required by federal law to report to the Internal Revenue Service (IRS) the name, address, and SSN for persons from whom tuition and related expenses are received. Federal law also requires the College to obtain and report to the IRS the Social

Security number for any person to whom compensation is paid. Furnishing a Social Security number is voluntary and not required for enrollment; however, failure to provide such information may delay and/or prevent enrollment and/or payment. It is important to note that the College will not disclose a Social Security number for any purpose not required by law without the consent of the student.

- **Employee**

Use of Employee Social Security Numbers: Delaware County Community College is required by federal law to report income along with Social Security numbers for all employees to whom compensation is paid. Employee Social Security numbers are maintained and used by the College for payroll, reporting, and benefits purposes and are reported to federal, state, and local agencies in formats required by law. The College will not disclose an employee's Social Security number without the consent of the employee to anyone outside the College except as mandated by law or required for benefits purposes.

Printed reports and other documents should not list Social Security numbers. If Social Security numbers need to be included in printed documents, such documents should be accessible only to individuals who require the information for the performance of their duties.

Except where the College is legally required to collect a Social Security number, individuals will not be expected to provide their Social Security numbers, verbally or in writing, at any point of service, nor will they be denied access to those services should they refuse to provide a Social Security number. However, they may volunteer their Social Security number if they wish as an alternate means of locating a record.

Social Security numbers will be released by the College to entities outside the College only:

- As allowed by law; or
- When permission is granted by the individual; or
- 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; or
- When approved by the Vice President for Administration and Treasurer.

Social Security numbers may continue to be stored as a confidential attribute associated with an individual.

Social Security numbers will be collected only in circumstances where the collection is mandated by a government agency.

4. Responsibilities

Supervisors must limit access to records containing Social Security numbers to only those employees who need to use the numbers for the performance of their duties as College employees.

If a College employee discovers that Social Security numbers have been disclosed inappropriately and the individuals whose Social Security numbers were disclosed are put at risk of identity theft or

harm, the employee must immediately notify the Vice President for Administration and Treasurer.

The Vice President for Administration and Treasurer is to assure that this policy is reviewed and updated.