SOCIAL SECURITY NUMBER POLICY
Approved by Executive Council 9/9/08

PURPOSE
To ensure that policies and procedures relating to the collection, maintenance and dissemination of social security numbers are implemented and maintained at SUNY Plattsburgh in accordance with state and federal regulations.

PERSONS AFFECTED
All SUNY Plattsburgh faculty, staff, and business associates in connection with the collection, maintenance and dissemination of Social Security numbers (SSNs).

POLICY
Social Security Numbers will not be used as a means of identifying an individual on any campus form or report, print or electronic media, except where required by federal or state law.

Federal Privacy Act of 1974
"It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number."

Exceptions:
To comply with another Federal law

For a computer system in place prior to 1975 In addition, all government agencies must provide a disclosure statement every time they ask for a Social Security Number. That is, whenever a Social Security Number is requested, the electronic or physical form used to collect the number must be clearly marked as to

Whether the request is voluntary or mandatory

By what authority or legal statute the number is solicited

What uses will be made of the Social Security Number

The consequences, if any, of failure to provide the information

Family Educational Rights and Privacy Act (FERPA)

A student's social security number is, by definition, "personally identifiable information" under FERPA. Social Security Numbers (or portions) may not be disclosed without consent with the exception of legal obligations (i.e. processing loans, employment, etc.).

NY State Law: Chapter 16, Article I, Title 1, Section 2b
"Institutions shall not display student Social Security Numbers on public listing of grades, class rosters, student ID cards, student directories, or anything else unless specifically authorized or required by law."

Departments using the SSN will:
Show institutional need
Receive approval from the Information Security Committee (ISC)

Audit their systems on a yearly basis to ensure safe SSN handling

Forms requesting a SSN will include a statement that addresses the need for the SSN and the law requiring the information.

Offices that offer window service will ask for the individual’s Net ID for account access.

Records containing SSNs will not be downloaded or stored on college or personal workstations or other electronic media devices that are not secured against unauthorized access in accordance with Plattsburgh State’s Workstation Use and Security Policy.

Paper and electronic records containing SSNs will be collected, maintained and disposed of in a secure manner in accordance with Plattsburgh State’s Device and Media Controls Policy.

DEFINITIONS - Refer to Information Security Glossary for Definitions
- Access
- Department Steward
- Electronic media
- Sensitive Information
- Use
- Workstation

RESPONSIBILITIES
All members of Plattsburgh State will comply with this policy.

The ISC will be responsible for conducting an annual review of departments using SSNs.

PROCEDURES
Requesting Social Security Number Access (Form or Report)
Department stewards will complete the Request for Access to Social Security Number Form and submit it to the ISC for approval.

Auditing
Departments using SSNs will be audited on an annual basis to determine continued need for access and review of safe procedures.

DOCUMENTS
Request for Access to Social Security Number
Workstation Use and Security Policy
Device and Media Controls Policy