

### **NMC Social Security Number Privacy**

The purpose of this policy is to comply with the State of Michigan Public Act 454 of 2004 to establish the social security number privacy regulations.

1. Employee Social Security Number Protection and Disposal

Northwestern Michigan College, in order to properly secure and protect employee Social Security Number/identification information, holds all employees that use or have access to any employee's Social Security number and information to the highest degree of confidentiality.

Other than authorized users, employees are prohibited from accessing, viewing or using other employees' Social Security information. Prohibited use according to the statute is:

- a. Publicly display all or more than 4 sequential digits of the social security number
- b. Use all or more than 4 sequential digits of the social security number as the primary account number for an individual, other than exceptions in the Public Act
- c. Visibly print all or more than 4 sequential digits of the social security number of any identification badge or card, membership card, or permit or license
- d. Require an individual to use or transmit all or more than 4 sequential digits of his or her social security number over the internet or a computer system or network unless the connection is secure or the transmission is encrypted
- e. Require an individual to use or transmit all or more than 4 sequential digits of his or her social security number to gain access to an internet website or a computer system or network unless the connection is secure, the transmission is encrypted, or a password or other unique personal identification number or other authentication device is also required to gain access to the internet website or computer system or network
- f. Include all or more than 4 sequential digits of the social security number in or on any document or information mailed or otherwise sent to an individual if it is visible on or, without manipulation, from outside of the envelope or packaging
- g. Subject to exceptions in the Public Act, beginning January 1, 2006, include all or more than 4 sequential digits of the social security number in any document or information mailed to a person, unless any of the exceptions in the Public Act apply
- h. No employee is permitted to access or use Social Security numbers without express permission of the college

Only personnel with appropriate authorization may access records and documents both internal and external that contain employee Social Security number and identification information.

Any employee or individual without authorization that accesses Social Security data without authorization or for illegal purposes shall be disciplined up to and including discharge. If illegal intent is determined employees will be referred to authorities for possible criminal prosecution.

All documents and records containing Social Security numbers and information will be kept in a secure environment with need to know access by authorized personnel only. When necessary documents containing this and other confidential information will be properly destroyed through shredding or other means before disposal.

If you have any questions regarding employee Social Security number privacy and security please contact the Human Resources for more information (231-995-1362).

## 2. Student Social Security Number Protection and Disposal

Northwestern Michigan College protects the student's right of privacy of information and recognizes the importance of maintaining the confidentiality of student records while performing effective functioning of the College. In this effort, NMC assigns each student a unique NMC ID to be used in place of the Social Security Number, SSN.

Social Security Numbers are collected from all students and are currently used for:

- a. Financial aid and admissions.
- b. Specific reporting functions as required by the state and Federal government.
- c. Mailing of transcripts displays last four digits of SSN only.
- d. Reporting to the National Student Clearinghouse used for attendance verifications, degree reporting, and loan tracking.

The NMC ID number may be used interchangeably for the SSN whenever the student registers for classes, makes a payment, or other internal functions. When the student gives a SSN, the NMC ID will print on any internal hard copy material such as schedules, rosters, bills, etc. Copies of materials with a student's ID or SSN are destroyed/shredded when not retained in a secure area. Any original hard copy material, such as applications, with the SSN listed, is treated as confidential material and is shredded or destroyed after the student has not registered for seven years.

Faculty and staff are notified annually of privacy procedures and FERPA requirements for any form of communication, printed or verbally. All documents and records containing Social Security numbers will be kept in a secure environment. Only personnel with appropriate authorization may access records and documents both internal and external that contain Social Security number and identification information. Any employee or individual that accesses Social Security data without authorization or for illegal purposes shall be disciplined up to and including discharge. If illegal intent is determined employees will be referred to authorities for possible criminal prosecution.

The Vice President for Educational Services and Executive Director of Human Resources, in conjunction with the appropriate faculty and staff, are responsible for the development and publication of any procedures or guidelines that may be necessary to administer this policy effectively.

President's authorization \_\_\_\_\_ Date 12/20/06

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