## Social Security Number Protection

Effective: October 14, 2005
Updated/Revised: April 15, 2008
Contact: Controller's Department

## 5 Introduction

- 6 Iowa State University recognizes that it collects and maintains confidential information relating to its
- 7 students, employees, and individuals associated with the University and is committed to maintaining
- 8 the privacy and confidentiality of an individual's Social Security Number (SSN). This policy applies to
- 9 all individuals and University organizational units that have access to, collect, or use an individual's
- 10 SSN.

## 11 Policy Statement

- 12 University ID shall replace SSN as the primary identifier used by the university. The university will
- discontinue the use of SSN as the primary identifier. Therefore, the use of SSN as an identification
- 14 number within the university shall be limited as permitted by law.
- 15 To protect the privacy of persons whose SSN is collected, all university offices will follow procedures
- maintained by the policy administrator and managed by university-designated data stewards. These
- 17 procedures were to be implemented by June 30, 2007, with requests for extensions of time to
- implement to be directed to the Policy Administrator prior to that date.
- 19 Persons responsible for breaching the privacy of another person by improperly obtaining, using or
- 20 disclosing a SSN are subject to discipline as provided in the applicable faculty and staff handbooks
- 21 or collective bargaining agreement and the Student Disciplinary Regulations.
- The following rules of conduct apply:
- 23. Employees and students shall comply with the provisions of this policy as well as related institutional
- 24 policies and procedures.
- 25. Employees may not request disclosure of a SSN from an individual if it is not necessary for the
- 26 purposes of the university and the particular function for which the employee is responsible.
- 27. Employees and students shall not disclose the SSN of another person to unauthorized persons or
- 28 entities.
- 29. Employees and students may not seek out or use the SSN of another person for their own interest or
- 30 advantage.
- 31. Employees responsible for the maintenance of records containing SSNs shall observe all
- 32 institutionally-established administrative, technical, and physical safeguards in order to protect the
- 33 confidentiality of such records.

- 35. Employees shall report promptly to their supervisor any inappropriate disclosure of a SSN.
- 36 If SSNs are inappropriately disclosed and individuals have been put at risk of identity theft or other
- harm as a result of the disclosure, the Office of University Counsel shall be notified promptly.
- 38 **Definitions**
- 39 **Primary Identifier**
- The primary identifier is the unique number used for identification.
- 41 University Identification Number
- The University Identification Number (University ID or UID) is an assigned number used for the
- exclusive purpose of identifying those who are affiliated with the university, or those who desire to
- 44 acquire services or access resources owned or operated by the university. The University ID is
- displayed as the middle block of 9 digits on the ISUCard.
- 46 Data Steward
- 47 Data Stewards are university executive officers or their designees who have planning and policy-
- 48 level responsibilities for data in their functional areas. These data stewards, as a group, are
- 49 responsible for recommending policies and establishing procedures and guidelines for university-
- wide data administration activities. Data stewards, as individuals, have management responsibilities
- for defined segments of the institutional databases such as SSN.
- 52 Resources
- 53 Links
- UID / ISUCard
- <u>UID / ISUCard Confidential Data in Electronic Communications</u>
- Office of University Counsel
- Student Disciplinary Regulations
- 58 **Files**
- SSN Protection Procedure [PDF]
- SSN Protection FAQ [PDF]