# Social Security Number Protection

Effective: October 14, 2005Reviewed: July 1, 2019

4 Contact: Controller's Department

## Introduction

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- 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 the
- 8 privacy and confidentiality of an individual's Social Security Number (SSN). This policy applies to all
- 9 individuals and University organizational units that have access to, collect, or use an individual's SSN.

## **Policy Statement**

- 11 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 number
- within the university shall be limited as permitted by law.
- 14 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
- 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.
- 18 Persons responsible for breaching the privacy of another person by improperly obtaining, using or
- 19 disclosing a SSN are subject to discipline as provided in the applicable faculty and staff handbooks or
- 20 collective bargaining agreement and the Student Disciplinary Regulations.
- 21 The following rules of conduct apply:
- Employees and students shall comply with the provisions of this policy as well as related institutional policies and procedures.
- Employees may not request disclosure of a SSN from an individual if it is not necessary for the purposes of the university and the particular function for which the employee is responsible.
- Employees and students shall not disclose the SSN of another person to unauthorized persons or entities.
- Employees and students may not seek out or use the SSN of another person for their own interest or advantage.
- Employees responsible for the maintenance of records containing SSNs shall observe all
- institutionally-established administrative, technical, and physical safeguards in order to protect the
- 32 confidentiality of such records.
- Employees shall report promptly to their supervisor any inappropriate disclosure of a SSN.

- 34 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.

#### 36 **Definitions**

- 37 Primary Identifier
- 38 The primary identifier is the unique number used for identification.
- 39 University Identification Number
- 40 The University Identification Number (University ID or UID) is an assigned number used for the exclusive
- 41 purpose of identifying those who are affiliated with the university, or those who desire to acquire services
- 42 or access resources owned or operated by the university. The University ID is displayed as the middle
- 43 block of 9 digits on the ISUCard.
- 44 Data Steward
- Data Stewards are university executive officers or their designees who have planning and policy-level
- responsibilities for data in their functional areas. These data stewards, as a group, are responsible for
- 47 recommending policies and establishing procedures and guidelines for university-wide data administration
- 48 activities. Data stewards, as individuals, have management responsibilities for defined segments of the
- 49 institutional databases such as SSN.

### Resources

51 Links

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- ISU Card Office
- Confidential Data in Electronic Communications
- Office of University Counsel
- Student Disciplinary Regulations
- 57 Files
- SSN Protection Procedure [PDF]
- SSN Protection FAQ [PDF]