


ADMINISTRATIVE PROCEDURE MANUAL			
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Purpose

This purpose of this procedure is to provide for the confidentiality of social security numbers and other confidential and sensitive information obtained by the College in the ordinary course of business. References in the policy to "social security number" mean an individual's social security number or more than four sequential digits of that number. References in the policy to "documents" include all documents regardless of form (i.e., paper, electronic, microfiche, etc.).

Definitions


“Sensitive Information” means primarily a person’s social security number. However, under certain circumstances, it is also intended to include i) driver’s license number; ii) passport number; iii) military identification number; iv) other financial account number or credit or debit card number; v) information related to an individual’s medical history; vi) health insurance policy numbers; and vii) user names combined with passwords.

Policy Statement


- A. The College expects that the use of the social security number as a common identifier and the primary key to databases be phased out and discontinued, except where required for employment, financial aid and as otherwise required by law. The College expects those with access to Sensitive Information to act ethically, keep such information confidential and only disclose such information as necessary to conduct College business or as otherwise required by law.
- B. A College ID will be assigned to all students and employees. The College ID shall be the preferred identifier and key to the College databases. Where possible, the College ID will be used in all electronic and paper data systems to identify, track and service individuals associated with the College.
- C. All forms on which persons are required to provide social security numbers must contain a statement explaining why the social security number is needed or otherwise provide a link to the following statement: [Statement on Use and Collection of SSN's](#)

Procedure

- A. Access to Sensitive Information - the College restricts access to information or documents containing Sensitive Information to members of the College who have a legitimate College business reason to access such information or documents.
- B. Prohibited Disclosures - members of the College shall maintain the confidentiality of Sensitive Information and documents containing social security numbers. Members of the College shall not do any of the following with the social security number of an employee, student or other individual:

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1. Publicly display the social security number.
 2. Use social security numbers as the primary account number or identification number for a student, employee or any other individual, except as necessary for internal business practices.
 3. Visibly print the social security number on any identification badge, membership card, permit or license.
 4. Email the social security number.
 5. Mail a document containing an individual's social security number unless it falls within one of the following exceptions:
 - a. State or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that the social security number appear in the document.
 - b. The document is sent to establish, confirm the status of, service, amend or terminate an account, contract, policy, or employee benefits, or to confirm the accuracy of a social security number of an individual who has an account, contract, policy or employee benefits.
 - c. The document is mailed in connection with an ongoing administrative use to do any of the following:
 - i. Verify an individual's identity, identify an individual or accomplish another similar administrative purpose related to an existing or proposed account, transaction, product, service or employment.
 - ii. Investigate an individual's claim, credit, criminal or driving history.
 - iii. Lawfully pursue or enforce the College's legal rights.
 - iv. Provide or administer employee benefits, claims or retirement programs.
 - d. The document is mailed by or at the request of the individual whose social security appears in the document or at the request of his/her parent or legal guardian.
 - e. Other exceptions approved by the Office of the General Counsel.
 6. Request an individual to transmit his/her social security number over the Internet or a computer system or network unless the connection is secure, or the transmission is encrypted.
 7. Mail any document containing a social security number that is visible on or from outside the envelope or packaging for the document.
- C. Authorized Disclosures - this procedure authorizes the disclosure of social security numbers where:
1. The disclosure is expressly required by federal or state law or court order.
 2. The disclosure is necessary for the College to perform its duties and responsibilities.
 3. The individual expressly consents in writing to the disclosure of his or her social security number.

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4. The disclosure is made to comply with the USA Patriot Act of 2001, Pub. L. No. 107-56, or Presidential Executive Order 13224.
 5. The disclosure of the social security number is made to a commercial entity for the permissible uses set forth in the federal Driver's Privacy Protection Act of 1994, 18 U.S.C. ss. 2721 et seq.; the Fair Credit Reporting Act, 15 U.S.C. ss. 1681 et seq.; or the Financial Services Modernization Act of 1999, 15 U.S.C. ss. 6801 et seq., provided that the authorized commercial entity complies with the requirements of F.S. 119.071.
 6. The disclosure is for the purpose of the administration of benefits for a College employee, retiree or his or her dependents.
 7. The disclosure is for the purpose of the administration of a pension fund administered for the College employee's retirement fund, deferred compensation plan, or defined contribution plan.
 8. The disclosure of the social security number is for the purpose of the administration of the Uniform Commercial Code by the office of the Secretary of the State.
 9. This policy also does not prohibit the use of social security numbers by the College Security or local law enforcement for criminal investigation purposes or the provision of social security numbers to a Title IV-D agency (child support/support orders), law enforcement agency, court or prosecutor as part of a criminal investigation or prosecution.
- D. Encryption of social security numbers is required between server and client workstations and whenever data is transmitted over public unsecured networks. Web applications transmitting social security numbers must use encryption. Email must be encrypted if transmitting social security numbers over email is unavoidable.
- E. Records, documents or reports containing Sensitive Information shall not be downloaded or stored on non-College personal computers or other electronic devices.
- F. Disposal of Sensitive Information - documents that contain Sensitive Information shall be properly destroyed when those documents no longer need to be retained pursuant to document retention policies. Paper documents containing social security numbers should be shredded or disposed of in the manner consistent with confidential and sensitive documents. Electronic documents containing social security numbers should be destroyed in a manner consistent with guidance issued by the College's Office of Records Management and the Chief Technology Officer (CTO).
- G. Any employee who reasonably believes that there has been an unauthorized disclosure of or access to Sensitive Information shall report the unauthorized access to the Office of the General Counsel or the Information Technology Security office.

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H. Violations of this policy may result in disciplinary action, up to and including dismissal for employees and suspension for students. Individuals who violate this policy may also be subject to the civil and criminal penalties provided for in federal and state regulations.

REFERENCES: F.S. 1001.64, 1001.65, 501.171, 18 U.S.C. §2721, 15 U.S.C. §1681, 15 U.S.C. §6801

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