

DOC 3 - IPA Training 2012 Summary

Social Security Number collection, use or disclosure is permitted only when:

1. Required under State or Federal law, rules or regulations; or otherwise necessary for the performance of the University's duties and responsibilities.
 - a. This is known as Business Imperative and only applies if no alternative information can be used in place of SSN (E-numbers, Date of Birth, Partial SSN, etc).
2. The need and purpose is documented before collection of the SSN.
 - a. Please refer to the University's Social Security Stated Purpose List for more detail.
3. The collection/use is relevant to the documented need and purpose

Restrictions on SSN Use/Disclosure:

You may not:

1. Use SSNs for any purpose other than for which it was collected
2. Use SSNs as a requirement to access a website
3. Sell, lease, loan, trade or rent a SSN to a third party for any reason
4. Publicly post, display or make available SSNs
5. Print SSNs on any card required to access EIU products or services
6. Transmit or require SSNs via the Internet unless connection is secure and SSN is encrypted
 - a. Applies to websites, electronic forms, email messages and all other Internet-based transmissions
7. Print SSNs on any materials mailed to the individual through US Postal Service, EIU Mail Services, any private mail service, email or similar method of delivery unless
 - a. Required by State or Federal law; or
 - b. Part of applications and forms in connection with admission to the University, to establish/amend/terminate contract/policy, or verify accuracy

Restrictions

- SSN may not be printed, whole or in part, on a postcard or other mailer that does not require an envelope
- SSN may not be visible on an envelope without the envelope having been opened.

Documenting SSN Use/Disclosure

To document SSN use and disclosure and provide public notice of use/disclosure, the University has the SSN Stated Purpose.

1. Only those areas identified on the SSN Stated Purpose list may collect, use or disclose SSNs
2. Collection, use or disclosure may only be for stated purpose
3. The ability to use the SSN must be approved with the respective Vice President

Redacting

IGP 133.2 sets two rules with respect to redacting SSNs and public information disclosures two rules

1. SSN collection, use and disclosure must be done in a manner that enables easy redaction such that no more than five sequential SSN digits are accessible
2. All departments must redact SSNs from information/documents prior to allowing public inspection or copying

Protecting Do's and Don'ts

With Respect to Social Security Numbers, don't:

- Collect, use or disclose SSNs unless required by federal or state law or business imperative
- Collect, use or disclose SSNs unless authorized by the University
- Collect, use or disclose SSNs in a way other than authorized
- Publicly post or display SSNs
- Print SSNs on an identification card
- Transmit SSNs electronically, including via email, websites, electronic forms or over the Internet unless encrypted
- Send SSNs through the postal mail, campus mail or via private mail service unless required by State or federal law
- Require SSNs to allow access to a website
- Store documents, physical or electronic, containing SSNs longer than necessary
- Position computer monitors where pass-byers can see the information that is on the screen.

With respect to Social Security numbers, do:

- Collect, use or disclose SSNs only in the authorized manner
- Disclose the purpose of the collection, use or disclosure of SSNs when asked
- Encrypt any SSN sent over the Internet or email
- Use a fully sealed envelope that hides the SSN from view when sending SSNs through postal mail, campus mail or via private mail service
- Keep documents with SSNs in cabinets/areas that are locked at all times
- Document the purpose and need for the collection, use or disclosure of SSNs
- Identify each person within your area that will need to collect, use or disclose SSNs
- Remove SSNs from all paper and electronic documents that do not require this information
- **Use Eastern Illinois University's E-number for all forms and other internal needs unless SSN use is allowed and listed on Stated Purpose list**
- **Store all documents with SSN in a locked cabinet.**

Further information regarding the Act, Contact:

Contact:

Office of General Counsel

217-581-7249

2102 Blair Hall

Eastern Illinois University

To report misuse or handling of SSN, Contact:

Information Security

217-581-1942

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