

**Title/Topic:** Social Security Number Policy

**Number:** 113.02

**Functional Classification:** Institutional Governance & Administration

**Monitoring Unit:**

**Initially Issued:** July 13, 2006

**Last Revised:** April 1, 2016

**Last Reviewed:** April 1, 2016

## **SOCIAL SECURITY NUMBER POLICY**

### **PURPOSE**

To establish policy governing the collection, maintenance, use and disclosure of Social Security Numbers (SSN) and to comply with the Family Educational Rights and Privacy Act [FERPA] and the Privacy Act of 1974.

### **OBJECTIVES**

- Eliminate the use of the SSN as the primary identifier for all individuals associated with the university
- Raise awareness of the confidential nature of the SSN
- Protect privacy interests
- Provide a consistent policy regarding treatment of SSNs
- Promote confidence by the University community that SSNs are handled in a confidential manner

### **GUIDELINES / REGULATIONS**

The Executive Vice President & Provost shall assign to an existing administrator the responsibility of overseeing Social Security Number usage as it relates to students, prospective students, parents and alumni. The Vice President for Finance & Administration and CFO shall assign an existing administrator the responsibility of overseeing Social Security Number usage as it relates to employees and other individuals (other than students, prospective students, parents and alumni) associated with the LSU.

Each Social Security Number Administrator shall be responsible for the following.

- Monitoring compliance with LSU's SSN Policy
- Authorizing the use of SSNs by appropriate persons acting for the University
- Coordinating communications to faculty, staff, and students concerning their rights and responsibilities with regard to collection, maintenance and distribution of SSNs
- Providing support and guidance for offices working with SSNs

- Maintaining a set of disclosure statements for use on University forms and documents that collect SSNs
- Develop a set of standards and guidelines addressing the handling of SSNs in electronic systems

An LSU identification number (LSUID) will be assigned to all students, employees, and other individuals with a need to access University services and facilities. The LSUID will not be the same as, or based upon, the individual's SSN or other unique demographic information. The LSUID will be assigned at the earliest possible point of contact between the individual and the University. The LSUID replaces the SSN as a common, unique identifier and will be used in electronic and paper data systems to identify, track, and provide service to individuals associated with the University. It will be permanently and uniquely associated with the individual to whom it is originally assigned. The LSUID will be considered the property of LSU, and its use and governance shall be at the discretion of the University, within the parameters of the law.

LSU will continue to store the SSN as confidential information associated with an individual. The SSN will be used as provided by law and as a key to identify individuals for whom a LSUID is not known. The Social Security Number may be used to verify information related to an individual and for law enforcement purposes.

The SSN may be used as a key to identify historical records given its past use as the primary identifier. SSNs may not be used as a primary identifier in a University system, including an indexing system for imaged documents, unless permission is granted by appropriate SSN Administrator.

Grades and other pieces of personal information will not be publicly posted or displayed in a manner where either the LSUID or SSN identifies the individual associated with the information.

Any transmission of data containing SSNs by LSU-related individuals over any communication network, including emails, must be transmitted through encrypted mechanisms.

All University forms and documents that request SSNs shall include an approved disclosure statement in compliance with the Federal Privacy Act of 1974. Existing forms and documents shall be modified as they are reprinted. Approved statements shall be available through the appropriate SSN Administrator.

All documents (paper and electronic) and any storage media containing SSNs shall be stored or disposed of in a timely and secure fashion consistent with state, federal and University record keeping policies.

SSNs will be released by the University to entities outside the University only as required or allowed by law, when permission is granted by the individual, or when the external entity is acting as the University's contractor or agent and, in keeping with University policies, adequate security measures are in place to prevent unauthorized dissemination to third parties.

This policy does not preclude, if a primary means of identification is unavailable, LSU employees from using the SSN as needed during the execution of their duties.

## **IMPLEMENTATION**

LSU will adopt a phased-in implementation of this policy since major systems are currently using SSNs as key identifiers. Conversion of these systems should be accomplished without causing serious disruptions in University business. A plan for a steady and purposeful movement away from dependency on SSNs will be developed. It is expected that this policy will be implemented in three years.

## **COMPLIANCE**

An employee, student, or other person who has breached the confidentiality of SSNs may be subject to disciplinary action or sanctions up to and including discharge and dismissal in accordance with University policy and procedures.