Policy

The Privacy Act of 1974 established a set of criteria that must be met in order to solicit a person’s Social Security Number. Additionally, Federal laws such as the Family Educational Rights and Privacy Act (FERPA) place restrictions upon the use and access to private information which Social Security Numbers are considered to be. Finally, retention and storage of items containing Social Security Numbers must also be considered to avoid inappropriate access or the retention of private information beyond the period for which it is legally required.

Generally, faculty, staff and students can be identified by means other than their Social Security Number (e.g. Falcon Account Number). Therefore, the rationale for soliciting a Social Security Number will need to be compelling or the request for such a solicitation will be disallowed.

Authority

The UW-River Falls Chancellor issues this policy in accordance with the Administrative Policy process. The Vice Chancellor for Business and Finance is responsible for the administration of this policy. To request an exception to this policy, mailto: administrative-policy@uwrf.edu.

Sanctions and Appeals Process

Failure to adhere to the provisions of this policy may result in appropriate disciplinary action as provided under existing procedures applicable to students, faculty, and staff, and/or civil or criminal prosecution.

Procedure

The Vice Chancellor for Business and Finance shall review and approve or reject all requests to solicit Social Security Numbers.

University Responsibilities

1. To collect and use Social Security Numbers only as permitted or required by Federal or State law, and only as reasonably necessary for the proper administration or accomplishment of the university’s business, government and educational purposes.
2. To provide notice as required by Section 7(b) of the Privacy Act of 1974 whenever the disclosure of a Social Security Number is requested.
3. To limit access to and display of Social Security Numbers to only those individuals with a valid job-related need to know. Electronic access to Social Security Numbers within UW-RF systems will be reviewed at least every two years.
4. To promptly and securely destroy records and other items containing Social Security Numbers once the legally required time period for retaining such records or items has elapsed. Items or records of historical significance may be excluded from this requirement upon the approval of the Vice Chancellor for Business and Finance.
Department/Unit Responsibilities

1. Departments and units will review and modify all existing and newly created forms or other objects that solicit Social Security Numbers to ensure that those items comply with the Privacy Act of 1974. The document “Guidelines for Soliciting Social Security Numbers” (attached) should be followed to ensure compliance. Any form or object that solicits a Social Security Number must be submitted for approval using the “Request for Approval to Solicit or Grant Access to Social Security Numbers” (attached) form. Electronic access to Social Security Numbers stored within University systems must also be requested using this form.

2. The department or unit administrators must ensure that only persons with a valid job-related need to know have access to Social Security Number information that is solicited or retained by the department or unit.

3. Departments and units should review any stored or retained records or objects that contain Social Security Numbers and, in consultation with the University Archivist, should ensure that said records or objects are properly and securely destroyed in a timely manner at the termination of their legally required retention period or transferred to the University Archives for permanent confidential/restricted storage.

Background

1. Wis. Stat. § 134.98

Contact

To direct questions about this policy, mailto: administrative-policy@uwrf.edu.
Guidelines for Soliciting SSN

Effective 09/01/2006, UW-River Falls will be requiring approval for any solicitation of Social Security Numbers. The solicitation of Social Security Numbers by a university department is allowed only when doing so is necessary to fulfill a record-keeping or reporting requirement. Such a requirement is typically made by a federal or state government agency, such as the Internal Revenue Service. Generally, only the following instances are allowable rationale for solicitation:

- When an individual is being employed and taxes are being collected that must be associated with the individual’s Social Security Number
- Financial assistance transactions are being made that must be reported using an individual’s Social Security Number

The identification of individuals is no longer a valid rationale for soliciting Social Security Numbers.

Electronic versus Paper-based Solicitations
These guidelines apply to both electronic solicitations and paper-based solicitations of Social Security Numbers. There are, however, some special considerations for each type of solicitation. For electronic solicitations, care must be taken to ensure that the electronic form of the SSN is available for viewing only to those individuals with an approved need to know. Additionally, the storage and transmittal of electronic data containing a SSN must be properly protected by encryption and/or firewall technology.

Paper-based solicitation must also be properly secured so that only those individuals with an approved need to know have access to the SSN information contained on a paper document. Storage and transportation of paper records containing SSN information must be done securely so that inappropriate individuals are not able to view the SSN information contained on the records.

Mandatory versus Voluntary Disclosure of Social Security Number Requirement
Per the Privacy Act of 1974 (as amended), any solicitation of Social Security Numbers must contain a disclosure stating to the person whose SSN is being solicited whether or not it is mandatory for them to provide their SSN to you.

Example: “Federal law allows the UW System to request and use your social security number. While you are not legally required to provide your social security number on this form, you are strongly encouraged to do so. You will be required to provide your social security number when you apply for financial aid or the new educational tax benefits.” — UW Application for Undergraduate Enrollment.

Statutory Authority Under Which Social Security Number is Solicited Requirement
Per the Privacy Act of 1974 (as amended), any solicitation of Social Security Numbers must contain information about the statutory or other authority under which the SSN is being solicited.

Example: “Federal law (20 U.S.C. 1232g; 34 C.F.R.s.99.1 et seq.) recognizes the student social security number as “personally identifiable information.” Accordingly, this information may only be disclosed under certain circumstances, including the following: to other institutional officials; to representatives of
state and local educational authorities; in connection with financial aid; for research; to collection agents in connection with university-related business; pursuant to an order from a court of law; and in other circumstances as required by state or federal law.” — UW Application for Undergraduate Enrollment.

**Statement as to Uses of Social Security Number Requirement**

Per the Privacy Act of 1974 (as amended), any solicitation of Social Security Numbers must contain a statement describing the use or uses that the solicitor will make of the SSN.

Example: “If you intend to apply for financial aid, the social security number is required. As applied to financial aid, it may be used for a number of purposes, including verification of identity of the borrower or recipient and as an account number throughout the life of a loan; determination of program eligibility; certification of enrollment and student status; determination of eligibility for deferment, cancellation or repayment by third parties; determination of eligibility for disability or death claims; and, in case of delinquent or defaulted loans, for tracing the borrower and collecting.” — UW Application for Undergraduate Enrollment.

**The following form must be completed and approved prior to requesting any Social Security Numbers**
University of Wisconsin-River Falls

Request for Approval to Solicit or Grant Access to Social Security Numbers

1. Department Requesting Approval:

2. Why is the SSN needed? Why can’t the Falcon account or other system identification number be used instead?

3. a. For solicitations:
   How will this information be stored and safeguarded?
   
   - Electronically
     List all applications and drive locations. Will data be encrypted? How will users be authorized?
   
   - Paper files
     List all physical storage locations used throughout the file’s lifecycle. Will the data be stored in a locked secure location? How will key(s) be distributed and who will have access?
   
   - Other
     Please describe.

   b. For electronic access:
      What system access is needed?

4. Who or what positions will have access to this information? Briefly describe why each position or person requires access.

5. How long will the information be retained? How was this retention schedule determined?

6. How will this information be destroyed at the end of the retention period?

Approvals

Requestor: ________________________________ Date: ________________

Dean or Director: ________________________________ Date: ________________

Vice Chancellor for Business & Finance

Date: ________________