COLUMBIA UNIVERSITY

SOCIAL SECURITY NUMBER (SSN) USAGE POLICY

Published: October 2013
Revised: November 2014

I. Introduction

Columbia University is committed to protecting Social Security Numbers (SSNs) of faculty, staff, students and other individuals associated with the University from unauthorized or unnecessary disclosure. Because the distinctiveness of the SSN as an individual identifier makes SSNs particularly vulnerable to exploitation, federal and state law and regulations require special protections for non-disclosure of SSNs in addition to those afforded Sensitive Data under the Information Security Policies (as such terms are defined in the Columbia University Information Security Charter (the "Charter") http://policylibrary.columbia.edu/information-security-charter.

The purposes of this Policy are to provide consistent and clear guidelines for the acquisition and use of SSNs and eliminate unnecessary storage and use of SSNs in University Information Resources (as defined in the Charter);

Capitalized terms used herein without definition are defined in the Charter.

II. Policy History

The effective date of this Policy is November 1, 2013. This Policy replaces the University's Social Security Number (SSN) and Unique Person Number Usage (UPN) Policy, dated September 10, 2007.

III. Policy Text

The faculty, staff, students and other individuals associated with the University must ensure that the following protections are implemented with respect to the use of SSNs:

1. The collection of SSNs is discontinued unless essential to the conduct of University business and a waiver has been granted by the applicable Information Security Office. Examples of permissible uses of SSNs are listed on Appendix A hereto.

2. Data containing SSNs are encrypted while in transit and in storage, including such Data that are stored on Removable Media as further described in the Columbia University Registration and Protection of Endpoints Policy http://policylibrary.columbia.edu/registration-and-protection-endpoints-policy.

3. No new Information Resource is purchased or developed by the University that uses the SSN as its primary key to a database except where required by law or a business need that has been approved by the applicable Information Security Office.

4. New Information Resources purchased or developed by the University use SSNs only as data elements (not as database keys) when required by law or a business need that has been approved by the applicable Information Security Office.

5. Any request for SSN Data is made for a legitimate purpose and indicates the intended use of such information.

6. The SSN is blanked out or masked in any document, form or online screen when the SSN is not essential to the purpose of the document, form or online screen.

7. No new Information Resource purchased or developed by the University displays SSNs visually, whether on computer monitors or on printed forms or other output, unless required by law or a business need that has been approved by the applicable Information Security Office.

IV.   Cross References to Related Policies

The Information Security Policies referred to in this Policy are listed in Appendix B hereto.

EXAMPLES OF APPROPRIATE USAGE OF SSNs

Tax Reporting

A SSN is required as a taxpayer ID for all tax information reported to the IRS, including wage and withholding data for full-time and part-time faculty, staff and students, for honoraria provided to guests and for individuals working for the University as independent contractors.

Financial Aid

A SSN is necessary to obtain financial information and to identify and confirm the level of financial aid assistance.

Human Resource Services

The Immigration Reform and Control Act of 1986 (IRCA) requires the use of an SSN for I-9 forms, and certain benefit providers, such as health insurance companies, may require an SSN for verification of eligibility and coordination of benefits. Therefore, in addition to the tax reporting reasons, SSNs will need to be collected from all new employees in the new hire process, and may be requested and used for certain human resource services functions when necessary.

Law Enforcement

Federal and state agencies often rely upon SSNs as the primary identifier for law enforcement and criminal information purposes. In the event such agencies request SSN information using proper procedures, and the University has such information, it will be provided following review and approval by the Office of the General Counsel.

Research

The collection and use of SSNs is often necessary for the conduct of research activities (e.g., epidemiological studies collecting mortality statistics). The Columbia University Institutional Review Boards must approve any collection of SSNs.

Health Records and Medical Billing

SSNs are used to identify patients' health records and for purposes of medical billing.

Student Information Systems

SSNs are collected from all students attending the University and maintained in the University's Student Information System.

Related Policies

Information Security Charter
http://policylibrary.columbia.edu/information-security-charter

Registration and Protection of Endpoints Policy
http://policylibrary.columbia.edu/registration-and-protection-endpoints-policy