

HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES

Chapter 2	General Policies and Procedures	Effective:	March 2004
Section 2.2	Information Management	Revised:	December 2008
Policy 2.2.7	Use of Social Security Numbers	Responsibility:	Assistant Vice President for Regulatory Affairs & Compliance

USE OF SOCIAL SECURITY NUMBERS

Policy

The use of the social security number (SSN) as an individual's primary identification number is prohibited, unless required or permitted by applicable law or by a third party. The PeopleSoft system-generated identification number will be the basis for the identifier used by the Health Science Center for employees, students, and non-employees. This number will be referred to as the Health Science Center identifier.

If another unique identifier is used, the identifier can not be derived from the social security number. It must be computationally infeasible to ascertain the social security number from the corresponding unique identifier.

If the collection and use of social security numbers is permitted, but not required by applicable law, the Health Science Center shall use and collect social security numbers only as reasonably necessary for the proper administration or accomplishment of the institution's business, governmental, educational and medical purposes, including, but not limited to:

- As a means of identifying an individual for whom a unique identification number is not known; and,
- For internal identification or administrative purposes.
- Use for verification or administrative purposes by a third party or agent conducting Health Science Center's business on behalf of the University where the third party or agent has contracted to comply with the safeguards in the "Disclosures to Third Parties" section below.

Except in those instances in which an institution is legally required to collect a social security number or a third party requires that social security number is collected, an individual shall not be required to provide his or her social security number, nor shall the individual be denied access to the services at issue if the individual refuses to disclose his or her social security number. An individual, however, may volunteer his or her social security number as an alternate means of locating a record or accessing services. A request that an individual

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provide his or her social security number for verification of the individual's identity where the institution is already in possession of the individual's social security number does not constitute a disclosure for purposes of this policy. Click on the following links for [federal](#) and [state](#) laws that allow for the collection or use of social security numbers. Questions about whether a particular use is required by law should be directed to the Institutional Compliance Officer/Privacy Officer.

Definitions

EMPLOYEE: Includes full-time and part-time workers hired and appointed by the Health Science Center, including student workers, fellows and faculty, in a regular or temporary position.

STUDENT: A person currently enrolled at the Health Science Center, or accepted for admission or readmission to the Health Science Center, or enrolled at the Health Science Center in a prior semester or summer session and eligible to continue enrollment in the semester or summer session that immediately follows.

NON-EMPLOYEE: Individual who is appointed by the Health Science Center in a non-employer-employee relationship and where there is no remuneration for services performed. Includes volunteers, visitors, stipend paid, and consultants.

Health Science Center Identifier

The PeopleSoft system-generated identification number will be the basis for the unique Health Science Center identifier for individuals. The unique identifier shall be used in all electronic and paper data systems and processes to identify, track and serve individuals associated with the Health Science Center. All institutional services and electronic business systems shall rely on the identification services provided by this unique identifier.

Notification Requirements When Collecting the Social Security Number

Each time the Health Science Center requests that an individual initially disclose his or her social security number, the Health Science Center shall provide the notice required by Section 7 of the Federal Privacy Act of 1974 (5 U.S.C. § 662a) (Notice), which requires that the institution inform the individual whether the disclosure is mandatory or voluntary, by what statutory or other authority the number is solicited, and what uses will be made of it. A subsequent request for production of a social

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security number for verification purposes does not require the provision of another notice. Several Notices have been developed:

- [Notice for Request of Disclosure of Social Security Number](#)
- [Notice for Request of Social Security Number for Employment Purposes](#)
- [Notice for Request of Social Security Number for Student Application Process](#)
- [Notice for Voluntary Disclosure of Social Security Number](#)

It is preferable that the “Notice” be given in writing, but if at times it will be given orally, departments shall develop and implement procedures to assure and document that the “Notice” is properly and consistently given.

Existing stocks of forms need not be reprinted with the “Notice”; the “Notice” may be appended to the form. Future forms and reprints of existing stock shall include the “Notice” printed on the form.

In addition to the “Notice” required by the Federal Privacy Act, when the social security number is collected by means of a form completed and filed by the individual, whether the form is printed or electronic, the institution must also provide the notice required by Section 559.003 of the Texas Government Code. That section requires that the institution state on the paper form or prominently post on the Internet site in connection with the form that: with few exceptions, the individual is entitled on request to be informed about the information that the institution collects about the individual; under Sections 552.021 and 552.023 of the Government Code, the individual is entitled to receive and review the information; and under Section 559.004 of the Government Code, the individual is entitled to have the institution correct information about the individual that is incorrect. The State notice is attached to the above Federal notices.

Student Grades

Student grades may not be publicly posted or displayed in a manner in which all or any portion of either the social security number or the unique identifier identifies the individual associated with the information.

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Protection of Social Security Numbers

The social security number may not be displayed on documents that can be widely seen by the general public (such as time cards, rosters, and bulletin board postings) unless required by law. This policy does not prohibit the inclusion of the social security number on transcripts or on materials for federal or state data reporting requirements.

Social security numbers shall not be printed on a card or other device to access a product or service provided by or through the institution.

If the Health Science Center sends materials containing social security numbers through the mail, it shall take reasonable steps to place the social security number on the document so as not to reveal the number in the envelope window.

The Health Science Center shall prohibit employees from sending social security numbers over the Internet or by e-mail unless the connection is secure or the social security number is encrypted or otherwise secured. The instructions for securing e-mail are at [Secure E-mail](#). The institution shall require employees sending social security numbers by fax to take appropriate measures to protect the confidentiality of the fax (such measures may include confirming with the recipient that the recipient is monitoring the fax machine).

The Health Science Center requires all records containing social security numbers be secured and maintained in accordance with the Health Science Center's security plan.

Records or media (such as disks, tapes, hard drives) containing social security numbers shall be discarded in accordance with the *Handbook of Operating Procedures* (HOP), [Section 6.3.3](#), "Deletion of State Property". Information containing social security numbers should be destroyed by shredding, reformatting, erasing or otherwise modifying the material to make it unreadable or indecipherable, and in accordance with the institution's record retention schedule.

Control Access to Social Security Numbers

Each department shall limit access to records containing social security numbers to those employees who need to see the number for the performance of the employees' job responsibilities.

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Each department shall monitor access to records containing social security numbers by the use of appropriate measures as reasonably determined by the Health Science Center.

Each department shall protect the security of records containing social security numbers during storage using physical and technical safeguards (such safeguards may include encrypting electronic records, including backups, and locking physical files).

Records containing social security numbers should not be stored on institutional or personal computers or other electronic devices that are not secured against unauthorized access.

Social security numbers may not be shared with third parties except:

- As required or permitted by law; or
- With the consent of the individual; or
- Where the third party is the agent or contractor for the institution and the safeguards described below under “Disclosure to Third Parties” are in place to prevent unauthorized distribution; or,
- As approved by the Legal Counsel.

**Disclosures to
Third Parties**

When social security numbers are shared with a third party that is the agent or contractor for the Health Science Center, a written agreement should be entered into to protect the confidentiality of the social security number as required by this policy. The Health Science Center should hold the third party accountable for compliance with the provisions of the written agreement through regular monitoring or auditing. The written agreement should:

- Prohibit the third party from disclosing the social security number, except as required or permitted by law; and,
- Require the third party to use adequate administrative, physical, and technical safeguards to protect the confidentiality of records or record systems containing social security numbers.

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**Acquisitions of
New Data
Systems**

All systems acquired or developed after the effective date of this policy must comply with the requirements stated below. If the acquisition or development is in process on the date that this policy was implemented, the system is exempt from these requirements:

- The system must use the social security number only as a data element or alternate key to a database and not as a primary key to a database;
- The system must not display social security numbers visually (such as on monitors, printed forms, system outputs) unless required or permitted by law or permitted by this policy;
- Name and directory systems must be capable of being indexed or keyed on the unique identifier, once it is assigned, and not on the social security number; and,
- For those databases that require social security numbers, the databases may automatically cross-reference between the social security number and other information through the use of conversion tables within the system or other technical mechanisms.

The Institutional Compliance Officer/Privacy Officer, in conjunction with Information Technology will be required to approve any proposed use of social security numbers in any new electronic system to be acquired or developed by the Health Science Center.

**Inappropriate
Disclosure or
Theft of Social
Security Numbers**

The Health Science Center requires all employees to report promptly inappropriate disclosure or theft of information containing social security numbers to their supervisor, who shall report the disclosure to the Institutional Compliance Officer/Privacy Officer and the Information Security Officer.

Reporting by the employee may be anonymous, in accordance with the institution's compliance program, if the employee chooses. Retaliation against an employee who in good faith reports an inappropriate disclosure of a social security number is prohibited. If the supervisor and Institutional Compliance Officer determine that the social security

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number was inappropriately disclosed or stolen, and individuals have been put at risk of identity theft or other harm as a result of the disclosure, the Health Science Center shall take all reasonable steps to promptly notify the individuals affected.

**Employee and
Student
Responsibilities**

Employees and students shall comply with the provisions of this policy. Specifically:

- Employees may not request disclosure of a social security number if it is not necessary and relevant to the purposes of the Health Science Center and the particular function for which the employee is responsible;
- Employees and students may not disclose social security numbers to unauthorized persons or entities;
- Employees and students may not seek out or use social security numbers relating to others for their own interest or advantage; and,
- Employees responsible for the maintenance of records containing social security numbers shall observe all Health Science Center established administrative, technical, and physical safeguards in order to protect the confidentiality of such records.

Failure to comply with this policy may result in disciplinary action in accordance with the HOP, [Section 2.1.2](#), "*Handbook of Operating Procedures*".
