

TEMPLE UNIVERSITY

POLICIES AND PROCEDURES MANUAL

Title: Social Security Number Usage Procedures

Policy Number: 04.75.12

Issuing Authority: Office of the Vice President for Computer and Financial Services, and Chief Information Officer

Responsible Officer: Vice President for Computer and Financial Services, and Chief Information Officer

Date Created: September 30, 2004

Date Last Amended/Reviewed: July 27, 2010

Date Scheduled for Review: July 27, 2015

Reviewing Office: Office of the Vice President for Computer and Financial Services, and Chief Information Officer

These Social Security Number Usage Procedures (“SSN Procedures”) issued by the Office of the Vice President for Computer and Financial Services, and chief information officer implement the Social Security Number Usage policy (“SSN Usage”), policy number 04.75.11, which can be found at <http://policies.temple.edu>.

SSN Procedures:

- I. In place of the Social Security number, a unique Temple University identification number (“TUID”) shall serve as the primary identifier or key for all Temple-related individuals (for whom the university requires an identifier) in accordance with the *Primary Identifier Guidelines* attached hereto as Exhibit A.
- II. The Social Security number may only be collected, maintained, and used as required by law or as required by practical necessity as approved by (i) the cognizant vice president or provost and (ii) the vice president for computer and financial services, and chief information officer. The Office of the Vice President for Computer and Financial Services, and chief information officer shall notify the university privacy officer of all uses of the Social Security number that have been approved based on practical necessity. A list of approved university uses of Temple-related individuals’ Social Security numbers is provided in the *List of Approved Uses of Social Security Numbers* attached hereto as Exhibit B.
- III. All university forms and documents (whether in paper or electronic form) that contain or require an identifier (“University Forms”) will be revised or designed to accommodate the TUID in accordance with the *University Forms Guidelines* attached hereto as Exhibit C.

- IV. Temple University computer and information systems shall be compliant with the guidelines provided in the *Guidelines for Computer and Information Systems* attached hereto as Exhibit D.
- V. Reasonable safeguards, approved by the Office of the Chief Information Security Officer, must be employed to ensure the security and confidentiality of the Social Security numbers collected, used, and maintained by Temple University. Such safeguards include those listed in the *List of Social Security Number Safeguards* attached hereto as Exhibit E.
- VI. Any Temple-related individual who violates the Social Security Number Usage policy or fails to comply with applicable SSN Procedures is subject to disciplinary action, up to and including dismissal or discharge.

Notes

1. Dates of official enactment and amendments:

Adopted by the vice president for computer and financial services, and chief information officer on September 30, 2004.

Amended by the vice president for computer and financial services, and chief information officer on January 26, 2005 (Subsection “k” of Exhibit E deleted).

Amended by the vice president for computer and financial services, and chief information officer on December 5, 2005 (Subsection “e” of Exhibit B added).

Amended by the vice president for computer and financial services, and chief information officer on July 27, 2010 (Subsection “e” of Exhibit B updated; Subsection “a” of Exhibit A updated).

2. History:

Implementation of this policy was accomplished by September 30, 2005.

3. Cross References

Presidential policy #04.75.11, Social Security Number Usage policy

Presidential policy #03.20.11, policy Regarding Confidentiality of Student Records

EXHIBIT A
Social Security Number Usage Procedures
Primary Identifier Guidelines

- a. The TUID, or other unique non Social Security number identifier, will be assigned to each Temple-related individual at his/her earliest point of contact with the university, for which a primary identifier is required (e.g., application for admission or initial employment).
- b. The TUID will be uniquely and permanently associated with the individual to whom it is originally assigned.
- c. The TUID will not be identical to, or derived from, the individual's Social Security number.
- d. A student's TUID will be considered part of that student's education record as defined by FERPA.
- e. The TUID will be used in electronic and paper systems to identify, track, service, and authenticate Temple-related individuals.
- f. The TUID remains the property of Temple University.

EXHIBIT B
Social Security Number Usage Procedures
List of Approved Uses of Social Security Numbers

- a. Identifying and authenticating certain student education records including admissions applications, registration documents, grade reports, transcript and certification requests, medical immunization records, student financial records, student aid programs, and academic records in connection with university business.
- b. Disclosing a student Social Security number to any non-Temple related third party only with the consent of the student in accordance with the university's Student Records Confidentiality policy, or as required by law without the consent of the student.
- c. Disclosing a Temple-related individual's Social Security number to any non-Temple-related third party only with the consent of the individual, or without the consent of the individual as required for reporting employment, enrollment, and financial data to governmental entities as required by law or the university's benefits programs.
- d. Identifying or authenticating individuals for whom a TUID is not known or is otherwise not available.
- e. All computer access allowing a user to view, add, or change Social Security Numbers must have a properly authorized "Access to Social Security Number Approval Form" on file with the university privacy officer. Exceptions to this requirement will be recommended by the vice president for computer and financial services, and chief information officer, and approved by the Office of University Counsel.

EXHIBIT C
Social Security Number Usage Procedures
University Forms Guidelines

- a. All University Forms in use at the time of the adoption of Social Security Number Usage policy will be revised to be consistent with the Social Security Number Usage Procedures and Social Security Number Usage policy.
- b. All University Forms developed after the time of the effective date of Social Security Number Usage policy will be developed consistent with the Social Security Number Usage Procedures and Social Security Number Usage policy.
- c. Only those University Forms that collect Social Security numbers for the purposes outlined in the *List of Approved Uses of Social Security Numbers* may include a field for such collection.
- d. All University Forms that collect the TUID will use the field name “TUID”.
- e. All University Forms requiring the collection of Social Security numbers must include a statement, approved by the university privacy officer, of the intended use of such Social Security numbers.

EXHIBIT D
Social Security Number Usage Procedures
Guidelines for Computer and Information Systems

- a. All computer and information systems purchased or developed by Temple University are prohibited from using or storing Social Security numbers except as permitted under the *List of Approved Uses of Social Security Numbers*, or, except as approved by (i) the cognizant vice president or provost and (ii) the vice president for computer and financial services, and chief information officer, and consistent with applicable laws. All additional approved uses will be sent to the university privacy officer and the Office of the President and added to the list of Approved Uses of Social Security Numbers.
- b. All computer and information systems purchased or developed by Temple University will use the TUID or other unique non-Social Security number identifier as the primary identifier for Temple-related individuals.
- c. All computer and information systems purchased or developed by Temple University will not display Social Security numbers visually, whether on computer monitors or on printed forms or any other system output, except as required pursuant to the *List of Approved Uses of Social Security Numbers*. Access to such displays shall be limited to those with a legitimate “need to know.”
- d. Computer and information systems that store the social security number of any Temple-related individual as permitted under the Social Security Number Usage policy must store the social security number in an encrypted format as approved the vice president for computer and financial services, and chief information officer.

EXHIBIT E
Social Security Number Usage Procedures
List of Social Security Number Safeguards

- a. Social Security numbers must be stored and/or processed on computers (servers or workstations) that are secured using methods approved by the Office of the Chief Information Security Officer, and such secure computers shall be kept in a physically-secure area.
- b. Any transmission of data containing Social Security numbers by Temple-related individuals over any communication network, including emails, must be transmitted through encrypted mechanisms.
- c. Social Security numbers collected through the Internet must use a secure connection as approved by Computer Services.
- d. Any online system that collects Social Security numbers from an end user must include a statement of the intended use of such Social Security numbers, which statement has been approved by the university privacy officer.
- e. Grades shall not be posted using the full, or any portion of, the Social Security number or the TUID.
- f. Service providers must provide adequate safeguards for the protection of the confidentiality of the Social Security numbers they may receive, access, or maintain on behalf of the university.
- g. All paper documents containing Social Security numbers must be stored in a physically-secure and restricted area. This may include storage in a locked room, locked filing cabinet, locked desk, or safe. Access to such documents shall be limited to those with a legitimate “need to know”. Paper documents that are no longer required by law, or by practical necessity, must be destroyed in a secure fashion, either by shredding or by placing the documents in a secure shredding console to await shredding.
- h. All electronic media containing Social Security numbers must be rendered unreadable prior to disposal.
- i. All electronic media (CD/DVD, external hard drives, thumb drives, removable media, etc.) containing Social Security numbers must be properly secured using methods approved by the Office of the Chief Information Security Officer, and shall be kept in a physically-secure area. This may include storage in a locked room, locked filing cabinet, locked desk, or safe.
- j. The Social Security number shall not appear visually or electronically on an identification card issued by Temple University.