



Administrative Policies and Procedures

Procedure Number	Subject	Effective Date	Revised Date
BU-1.1.12	Social Security Number	10/21/2004	

I. Purpose

This policy addresses the requirements of the Federal Privacy Act of 1974 and amendments, regarding requests by the Institute for Social Security Numbers (SSN) and provides guidelines for policy and procedures on the proper use and disclosure of the SSN to ensure that the Federal Privacy Act requirements are met.

II. Background

The Federal Privacy Act of 1974 and amendments establish guidelines under which any state agency may request Social Security Number from individuals. Individuals may not be required to give their SSN unless specific to a Federal or State statute. Agencies may not deny any right, benefit or privilege to any individual because of their refusal to disclose their SSN. It is incumbent on the Institute to inform the individual whether the disclosure is mandatory or voluntary, by what statute or other authority, and what uses will be made of the Social Security Number. (Reference A)

The Social Security Number was not designed to serve as a universal identification mechanism. Casual use of the SSN has led to the escalation of the crime of identity theft. With the SSN accessible to so many people, it is possible for someone to fraudulently use an individual's Social Security Number to assume another identify and gain access to financial and other personal information, risking an individual's personal credit and confidentiality. For many years, SSN has been used as an identification number in many computer systems; giving access to private information and allowing an easy way to link database information. Federal Privacy Act compliance serves as a deterrent to identity theft and its consequences. It is the intent of the Institute to take the necessary precautions to protect the identity of all of its constituents.

III. Collection and Release of the Social Security Number

Student



The Board of Regents (BOR) supports the use of alternate identifiers for students as indicated below in the BOR policy manual.

“The social security number shall be required from all entering students for a permanent and lasting record. When possible, an alternative number will be assigned and used by institutions for all purposes, which do not require the social security number. In no event shall grades be posted by using the social security number. The University System of Georgia is dedicated to insuring the privacy and proper handling of confidential information pertaining to students and employees.”

Bainbridge College will request that a student provide a Social Security Number at the time of application to the Institute. The Social Security Number will not be used as the student ID number but will be provided to entities requiring Social Security Number, including but not limited to the federal government for financial aid and Tax Relief Act (1997) reporting, Immigration and Naturalization Service, Board of Regents of the University System of Georgia for statistical reporting purposes and as required by court order in accordance with the Family Educational Rights and Privacy Act. Information on collection and disclosure of a student social security number can be found in the General Catalog.

Employee

Bainbridge College will require that an employee provide a Social Security Number at the time of employment. The Social Security Number will not be used as an Employee ID number for internal Institute uses, but will be provided to external entities requiring Social Security Number, including but not limited to federal, state and local governments, insurance carriers, and retirement programs. Individuals who are affiliates or vendors will be required to provide a Social Security number for mandated tax reporting purposes.

IV. Regulations

- A. Systems purchased or developed by Bainbridge College will not use Social Security numbers as identifiers unless required by law or business necessity.
- B. All Bainbridge College employees, students and other individuals that require an identifying number, will be assigned a unique identification number that is not the same as, or derived from, the individual's Social Security number.
- C. Systems purchased or developed by Bainbridge College will use Social Security numbers as data elements only, not as keys to databases.



D. Systems purchased or developed by Bainbridge College will not display Social Security numbers visually, whether on computer monitors, or on printed forms or other system output, unless required by law or business necessity.

E. Name and directory systems purchased or developed by Bainbridge College will be tied to an individuals' unique identification number, not social security number.

F. When databases require Social Security numbers, the database will automatically cross-reference between the Social Security number and other information through the use of conversion tables with systems or other mechanical mechanisms.

G. No system or technology will be developed or purchased by Bainbridge College unless it is compatible with these regulations.

Reference. A

DISCLOSURE OF SOCIAL SECURITY NUMBER

Section 7 of Pub. L. 93-579 provided that: '(a)(1) It shall be unlawful for any Federal, State or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security account number. '(2) the (The) provisions of paragraph (1) of this subsection shall not apply with respect to - '(A) any disclosure which is required by Federal statute, or '(B) the disclosure of a social security number to any Federal, State, or local agency maintaining a system of records in existence and operating before January 1, 1975, if such disclosure was required under statute or regulation adopted prior to such date to verify the identity of an individual. '(b) Any Federal, State, or local government agency which requests an individual to disclose his social security account number shall inform that individual whether that disclosure is mandatory or voluntary, by what statutory or other authority such number is solicited, and what uses will be made of it.'