

Pursuant to both state and federal law, it is the policy of this School District to protect the confidentiality of social security numbers. No person shall knowingly disclose, transfer, or unlawfully use the social security number of any employee, student, or other individual.

The Superintendent shall establish rules and regulations to implement this policy. The Superintendent shall ensure that:

1. The confidentiality of social security numbers is maintained to the extent practicable;
2. The unlawful disclosure of social security numbers is prohibited;
3. Access to information or documents containing social security numbers is limited; and
4. Documents containing social security numbers are disposed of properly.

This policy and its rules shall be published in the appropriate handbooks, manuals, and other similar documents. The published document(s) may also be made available electronically.

Persons who violate this policy, or the rules that implement it, may be subject to disciplinary action up to and including suspension or expulsion for students and termination for employees.

Approved:

LEGAL REF: MCL 445.81 *et seq.*; 18 USC 1028; 5 USC 552a (The Privacy Act of 1974)

Public Records

Where a social security number is contained within a document subject to FOIA release, the social security number shall be redacted.

Information Collected

Social security numbers should only be collected where required by federal or state law. If a unique personal identifier is needed, then a substitute for the social security number shall be used such as a District-created student identification number not using the social security number.

Whenever the District collects a social security number, the District shall inform the individual of the purpose for the collection, the intended use, whether the law requires the number to be provided, and the consequences of not providing the number.

Public Display

Social security numbers shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, or any other materials or documents seen by others widely.

Documents, materials, or computer screens that display social security numbers or other sensitive information shall be kept out of public view at all times.

Social security numbers shall not be required for a District employee, student, or staff member to gain access to the Internet or network.

Mailed or Transmitted Documents

Documents containing social security numbers shall only be sent where permitted by state law.¹ Documents containing social security numbers, that are sent through the

¹ A social security number may be included in a mailed document where: 1) It is sent as part of an application or enrollment process initiated by the individual. 2) It is sent to establish, confirm the status of, service, amend, or terminate an account, contract, employee, or health insurance benefit - or to confirm the accuracy of a social security number of an individual who has a account, contract, policy, or employee or health insurance benefit. 3) It is contained in a public record and is mailed in compliance with the freedom of information act. 4) It is a copy of a vital record, which was recorded according to law, and is mailed to a person entitled to receive that record. 5) It is mailed by, or at the request of, an individual whose social security number appears in the document or information or his or her parent or legal guardian.

mail, shall not reveal the number through the envelope window or otherwise be visible from outside the envelope or package.

Social security numbers shall not be sent through email unless the connection is secure or the number is encrypted.

No individual shall be required to send his or her social security number through email unless the connection is secure or the number is encrypted.

Telephonic Communications

District employees shall not disclose any social security number over the telephone or leave a voice mail message disclosing any social security number. If a social security number must be faxed, the Fax message shall be accompanied by a transmittal sheet, which includes the District's name, a "Confidential Notice" stating that the information included is intended to be privileged and confidential, and that it is only intended for the use of the individual or entity named on the transmittal sheet.²

Access to Social Security Numbers

Only those persons authorized by the Superintendent or building Principal shall have access to social security numbers or other sensitive information. Under no circumstances will any student have access to social security number information for either students or staff.

Storage and Disposal

All documents or files that contain social security numbers or other sensitive material shall be stored in a physically secure manner.

Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

Documents or other materials that contain social security numbers or other sensitive information shall not be thrown away in the trash; they shall be discarded or destroyed only in a manner that protects their confidentiality, such as shredding.

² Cf. 4260

When erasing social security numbers or sensitive information from computers, it shall be ensured that the information is erased completely.

The Superintendent shall establish regular intervals when unneeded sensitive information is disposed of properly.

Improper Disclosures

Any individual who suspects that an improper disclosure of a social security number has been made shall inform the Superintendent.

If the Superintendent suspects that an improper disclosure has been made, he/she shall contact the appropriate authorities.

Policy Availability

All current and future District employees shall be given a copy of the above rules. The District Privacy Policy shall be published in an employee handbook, procedural manual, or another similar document, that may be made available electronically.

Accountability

Any person who fails to comply with the District's Privacy Policy shall be subject to appropriate discipline as determined by the Superintendent.