SOCIAL SECURITY NUMBERS
REVIEW - DESTROY - SECURE - COMPLY

Bringing NDSU into Compliance for Protected Data
Laws Governing SSNs

- Federal Privacy Act of 1974
- Federal Information Security Act of 2002 (FISMA)
- Family Education Rights and Privacy Act of 1974
- Gramm Leach Bliley Act of 1999 (GLBA)
- Health Insurance Portability Accountability Act
- Fair Credit Reporting Act
- Children’s Online Privacy Protection Act
- Fair and Accurate Credit Transaction Act of 2003
- Red Flag Rules: Interpretation of 114 and 315 of FACTA

- North Dakota Century Code, Ch. 44-04, Open Records
- North Dakota Century Code, Chapter 52-01-03, Social Security
Statement

• NDSU recognizes that it collects and maintains Social Security numbers
• The University, in the course of its operations, is dedicated to ensuring the privacy and proper handling of this information.
Purpose

- SSNs are highly confidential and legally protected data
- The University is committed to protecting SSNs
- The use of SSNs as identification numbers must be limited
- Standards, guidelines, and procedures have been developed for the proper care, use, and disclosure of SSNs
University’s Responsibilities

- **Identify** the authority that specifies the need for SSNs
- The authority to **Inform** individuals when the collection of SSNs is required
- **Define** the purpose(s) for collection and use of SSNs
- **Outline** the consequences that may occur when SSNs are not provided
Compliance Strategy

Scope/Objectives

- **Increase** awareness of the confidential nature of SSNs
- **Reduce** reliance upon SSNs for identification purposes
- **Ensure** consistent and appropriate handling of SSNs throughout the University
- **Eliminate** non-essential use of SSNs
Roles/Responsibilities

• Each division’s vice president or designee is responsible for:
  • Overseeing and protecting *authorized* SSNs
  • Ensuring that all occurrences of SSNs, where not required, are removed from electronic and hard copy files

• NDSU Office of Ethics, Compliance and Audit is responsible for:
  • Knowing which divisions collect, store, and maintain SSNs both in hard copy and electronic format
  • Auditing and assessing the standards and guidelines
  • Providing education and recommendations to divisions who are not in compliance
Steps to Compliance

• Review
  • Software search tool available

• Destroy
  • SSNs no longer required must be removed from electronic/paper documents, or documents must be properly destroyed

• Secure
  • Auditor must be notified that SSNs are needed and how they are protected

• Comply
  • Certification of compliance filed with auditor
SSN Project Resources

- Web site: www.ndsu.edu/vpfa/ssn_management/
- Operation_Find_Lite application and instructions
  www.ndsu.edu/vpfa/ssn_management/application/
## Contacts

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