

Connecticut State University System



Developing a State of Minds

RESOLUTION

concerning

THE COLLECTION, STORAGE, USE AND DISCLOSURE OF SOCIAL SECURITY NUMBERS

June 14, 2002

- WHEREAS, The Board of Trustees desires to protect the confidentiality and privacy of students and employees of the Connecticut State University System concerning the collection, use and disclosure of Social Security Numbers, and
- WHEREAS, The Board of Trustees deems it appropriate to institute a policy with regard to obtaining, using and disclosing such numbers; now be it
- RESOLVED, That, except in those cases and for those purposes in which Federal or State law permits or requires obtaining, using or disclosing a person's Social Security Number for identification or other prescribed reasons, no person shall be required to provide his or her Social Security Number to the Connecticut State University System or its universities, and no data system in the Connecticut State University System will publicly identify a person with a code or an identifying number that contains a reference to or duplicates a person's Social Security Number or otherwise uses or discloses a Social Security Number unless so permitted or required by Federal or State law, and be it further
- RESOLVED, That offices within the Connecticut State University System may continue to request, collect, store, or maintain Social Security numbers as permitted or required by Federal or State law, and be it further
- RESOLVED, That whenever Social Security Numbers are collected, stored, maintained, used or reported, students, faculty or staff in the Connecticut State University System must be notified, except as otherwise precluded by Federal or State law, (generally or individually, as the case may be) of any use or disclosure of their Social Security Number and personnel responsible for keeping, maintaining or disclosing Social Security Numbers pursuant to applicable Federal or State law must be notified that Social Security Numbers are confidential and must be protected from disclosure except as permitted or required by Federal or State law, and be it further

RESOLVED, That compliance with this policy will be implemented as soon as is practicable.

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William J. Cibes, Jr., Chancellor

ITEM

The Collection, Storage, Use and Disclosure of Social Security Numbers

BACKGROUND

Current administrative practices permit the use of Social Security Numbers (SSN) as the standard identifier for faculty, staff and students of the Connecticut State University System. With identity theft a nationwide problem and responsibility to maintain the confidentiality of student records, many higher education institutions are moving away from the use of the SSN as the standard identifying number to a Personal Identification number to provide greater security and protection of individual SSNs.

ANALYSIS

The Board of Trustees believes it appropriate to institute a policy concerning obtaining, using and disclosing SSNs. The proposed policy provides that:

- no person shall be required to provide his or her Social Security Number to the Connecticut State University System or its universities, unless permitted or required by applicable law;
- no data system in the Connecticut State University System will publicly identify a
 person with a code or an identifying number that contains a reference to or
 duplicates a person's Social Security Number or otherwise uses or discloses a Social
 Security Number unless so permitted or required by Federal or State law;
- offices within the Connecticut State University System may continue to request, collect, store, or maintain Social Security numbers as permitted or required by law;
- students, faculty or staff in the Connecticut State University System must be notified (either in a general notice or individually, as the case may be) of any use or disclosure of their Social Security Number;
- personnel responsible for keeping, maintaining or disclosing Social Security Numbers pursuant to applicable Federal or State law must be notified that Social Security Numbers are confidential and will be required to protect such information from disclosure except as permitted or required by Federal or State law.

Implementation of this policy is to be completed as quickly as practical, recognizing the complexity involved in the transition to the use of non-SSNs as primary identifiers.

CHANCELLOR'S RECOMMENDATION

Approve the policy on the Collection, Storage, Use and Disclosure of Social Security Numbers.