



# *CITY OF GRAND RAPIDS* **ADMINISTRATIVE POLICY**

NUMBER: 05-01	DATE: December 13, 2005
REVISIONS:	
ISSUED BY: City Manager	SIGNED: <i>10/13/05 - J. Kowalski</i>

**SUBJECT: SOCIAL SECURITY NUMBER PRIVACY**

**PURPOSE:** In accordance with the Michigan Social Security Number Privacy Act ("Privacy Act"), 2004 P.A. 454, MCL 445.81 - 445.87, the City of Grand Rapids desires to establish, publish, and enforce a policy regarding how the City and its employees shall obtain, use, retain, disclose, disseminate, and/or dispose of records which contain Social Security Numbers.

**POLICY:**

It is the policy of the City of Grand Rapids to protect the confidentiality of Social Security Numbers obtained, used, retained, disclosed, disseminated, and/or disposed of by the City and its employees, to the greatest extent possible.

It is further the policy of the City of Grand Rapids to reduce reliance upon Social Security Numbers for identification purposes, in order to protect the privacy of individuals and City employees, and also to reduce incidents of identity theft.

The use of Social Security Numbers as a common identifier, primary account number, and primary key to City databases shall be discontinued, unless exemption for such use is permitted under the Privacy Act and such use complies with this Policy and Procedure.

**PROCEDURE:**

A. Obtaining Social Security Numbers. All records containing Social Security Numbers shall be requested, obtained, and/or created by the City and its employees only for legitimate business reasons. Such reasons include, but are not limited to the following:

1. Persons applying for employment with the City may be required to provide their Social Security Number and/or Social Security Card for all Human

Resources purposes related to employment processes and benefit administration, including:

- (a) pre-employment background checks;
  - (b) verification and compliance with state and federal employment laws, including immigration laws;
  - (c) tax reporting purposes; and
  - (d) employee benefit enrollment processes.
2. Persons may be required to provide their Social Security Number as part of any application or enrollment process initiated by that individual.
  3. Contractors and vendors may be required to provide their Social Security Numbers or tax identification number for tax-reporting purposes (e.g. IRS Form 1099).
  4. Social Security Numbers may be obtained in furtherance of other purposes specifically exempted from the scope of the Privacy Act.

**B. Use, Disclosure, and Dissemination of Social Security Numbers.**

1. City employees shall comply with the requirements of the Privacy Act, specifically those set forth at MCL 445.83.
2. City employees are hereby prohibited from unlawfully disclosing Social Security Numbers, and/or otherwise violating the Privacy Act.
3. No City department or employee shall visibly print all or more than 4 sequential digits of a Social Security Number on any identification badge or card, membership card, permit or license.
4. When a City department or employee mails or otherwise sends to an individual a document or record which contains a Social Security Number, the City department or employee shall ensure the following:
  - (a) no such document or record shall contain more than four sequential digits of a Social Security Number, unless the requirements of MCL 445.83(1)(g) are satisfied;
  - (b) no portion of the Social Security Number shall be visible on the outside of the envelope or packaging; and
  - (c) no portion of the Social Security Number shall be visible, without manipulation, from outside of the envelope or packaging.

5. To the extent that any City department or employee is authorized or required to utilize a person's Social Security Number by state or federal statute or some other legal authority, that department or employee may continue to utilize the Social Security Numbers in the manner so authorized.
6. The City and its employees may continue to utilize Social Security Numbers for law enforcement purposes, as part of a criminal investigation or prosecution.
7. The City and its employees may continue to utilize Social Security Numbers in order to provide or administer employee benefits, health insurance benefits, and retirement programs and/or benefits.

C. Retention and Access to Social Security Numbers.

1. All records containing any portion of a Social Security Number, including laptop computers, shall be maintained in a secured location, when not in immediate use. Proper procedures include, but are not limited to the following:
  - (a) Placing such records in a locked desk, locked file drawer, or locked office when not in use; and
  - (b) Utilizing password protection and/or screen-savers on computers and/or computerized records to prevent unauthorized access to or viewing of such records by others.
2. When records or media (such as computer disks, tapes, hard drives, etc.) are discarded, they shall be discarded in such a way that protects the confidentiality of the Social Security Numbers contained therein (e.g., shredding, reformatting, erasing, etc.).
3. Unless otherwise ordered by a court of law, all public records containing Social Security Numbers shall be redacted to remove the Social Security Numbers or to otherwise render the Social Security Numbers unreadable, prior to the release of such records pursuant to the Michigan Freedom of Information Act.
4. Only City employees who have a legitimate business reason for accessing records containing Social Security Numbers shall be permitted such access.
  - (a) Employees whose jobs entail regular access to records containing Social Security Numbers shall be trained in the requirements of Michigan law, as well as the requirements of this Policy and Procedure.

- (b) Unless otherwise legally permitted, where a record containing a Social Security Number is to be disseminated to persons outside of the City organization, to persons within the City organization who are not authorized or trained in this Policy and Procedure, or where the Number is not relevant to the purpose for which the record is being shared, the Social Security Number shall be redacted or otherwise rendered unreadable.
- 5. Inactive records containing Social Security Numbers will be retained in accordance with the requirements of state and federal laws and then disposed of in one of the following ways:
  - (a) the record shall be destroyed in a manner that continues to ensure the confidentiality of the Social Security Numbers; or
  - (b) the record shall be redacted to remove the Social Security Numbers or to otherwise render the Social Security Numbers unreadable.

For purposes of this Policy, “inactive records” include but are not limited to records involving individuals who are no longer current employees, retirees, suppliers, vendors, or contractors of the City, or where no legally permissible retention function continues to exist.

D. Unauthorized Use / Disclosure of Social Security Numbers.

- 1. Any employee who obtains, uses, or discloses a Social Security Number for unauthorized purposes, in a manner contrary to the Privacy Act, or in a manner contrary to the requirements of this Policy and Procedure shall be subject to disciplinary actions and/or sanctions, up to and including discharge.
- 2. The City and its employees shall cooperate with appropriate law enforcement and/or administrative agencies in the apprehension and prosecution of individuals who obtain, use, or disclose Social Security Numbers in violation of state law.

E. Departmental Oversight.

Each City department shall be responsible for overseeing and ensuring the implementation of this Policy and Procedure, within that department.