MEMORANDUM

TO:

All Department Directors

FROM:

April L. McGrath, Director of Human Resources

SUBJECT:

Social Security Policy

DATE:

March 29, 2006

Attached you will find a Social Security Policy for the City of Monroe. Please review and make any necessary changes to your departmental procedures. Also, please make sure all employees needing to see this policy review it as well.

Send me an e-mail or a memo regarding any changes you propose to make for my file. If your department does not utilize Social Security Numbers please send me that statement. This will also serve as proof that you received this policy. I need this information by May 1, 2006.

If you have any questions about how your department needs to comply, please let me know and I will help you.

City of Monroe Social Security Number Privacy Policy Effective: January 3, 2006

I. Policy

Pursuant to Michigan state law, it is the policy of the City of Monroe to protect the confidentiality of social security numbers. No person shall knowingly acquire, disclose, transfer, or unlawfully use the social security number of any employee or other individual unless in accordance with applicable state and federal law and the procedures and rules established by this policy.

II. Administrative Procedures/Rules

A. Social Security Number Defined

As used in this policy, the term "social security number" includes both the entire nine-digit number and more than 4 sequential digits of the number.

B. Public Display

Social security numbers shall not be placed on identification cards or badges, membership cards, permits, licenses, time cards, employee rosters, bulletin boards, or any other materials or documents that are publicly displayed. Documents, materials, or computer screens that display social security numbers or other sensitive information shall be kept out of the public view at all times.

C. Access to Social Security Numbers

Only persons authorized by the responsible department or other administrative unit head shall have access to information or documents that contain social security numbers.

D. Mailed or Transmitted Documents

Documents containing social security numbers shall only be mailed or transmitted in the following circumstances:

- (i) State or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that a social security number appear in the document.
- (ii) The document is sent as part of an application or enrollment process initiated by the individual whose social security number is contained in the document.
- (iii) The document is sent to establish, confirm the status of, service, amend, or terminate an account, contract, policy or employee or health insurance benefit or to confirm the accuracy of a social security number of an individual who has an account, contract, policy, or employee or health insurance benefit.
- (iv) The document or information is a copy of public record filed or recorded with the county clerk or register of deeds office and is mailed by that office to a person entitled to receive that record.

- The document or information is a copy of a vital record recorded as provided (v) by law and is mailed to a person entitled to receive that record.
- The document or information is mailed by or at the request of an individual (vi) whose social security number appears in the document or information or his or her parent or legal guardian.

Documents containing social security numbers that are mailed or otherwise sent to an individual shall not reveal the number through the envelope window, nor shall the number be otherwise visible from outside the envelope or package.

Social security numbers shall not be sent over the internet or a computer system or network (e.g. through e-mail) unless the connection is secure or the transmission is encrypted. No individual shall be required to use or transmit his or her social security number over the internet or a computer system, or to gain access to an internet website, computer system, or network (e.g. through e-mail) unless the connection is secure, the transmission is encrypted, or a password or other unique personal identification number or other authentication device is also required to gain access to the internet website or computer system or network.

E. Storage and Disposal

All documents or files that contain social security numbers shall be stored in a physically secure manner. Social security number shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

Documents or other materials containing social security number 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.

F. Information Collected

Social Security numbers should only be collected where required by federal and state law or as otherwise permitted under the Michigan Social Security Number Privacy Act. If a unique identifier is needed, a substitute for the social security number shall be used.

G. Accountability

Any person who fails to comply with this policy shall be subject to discipline up to and including discharge.

H. Policy Guidance

If any questions regarding social security number privacy and security should arise, contact the Director of Human Resources for policy clarification and guidance. 3/23/08 Date

John Michrina, Interim City Manager