MCCC OMB913

CONFIDENTIALITY OF PERSONAL INFORMATION

Reasons for Policy

- 1. To ensure broad awareness of the confidential nature of Social Security, credit card and bank account numbers;
- 2. To minimize use of Social Security numbers for identification purposes;
- 3. To emphasize the importance of secure use, transmission, and storage of students' and employees' personal information throughout college systems; and
- 4. To increase confidence among students and employees that their personal information will be handled in a confidential manner.

Policy Statement

The College's intent is to protect the privacy of its students' and employees' Social Security numbers and other personal information, to minimize the risk of identity theft. Accordingly:

- 1. Only to the extent required by State and Federal law or regulation, the Social Security number is collected by the College as the individual unique identifier for the purpose of accurately processing and maintaining educational and employment records. Specific exceptions must be provided as required by immigration law, the Privacy Act of 1974 and FERPA.
- 2. The Social Security number may not be used as a common identifier or used as a database key in any electronic information system;
- 3. Once collected, Social Security numbers will only be accessed through procedures and guidelines authorized by the President.
- 4. All records or reports containing Social Security numbers and/or other personal information, whether on-line or off-line, in electronic or hard copy format, are considered confidential information and must be maintained appropriately. Access to records or reports containing Social Security numbers and/or other personal information shall be limited and secure from view from college staff and students not having been granted access to said data. If and when these records or reports are no longer needed, disposal of the records must follow the College Record Retention Policy.
- 5. Unless the College is legally required to collect Social Security numbers, individual students or employees will not be required to provide their Social Security numbers verbally or in writing at any point of service, nor will they be denied access to college services should they refuse to provide a Social Security number. However, individuals may volunteer their Social Security number if they wish as an alternate means of locating a record.
- 6. All employees who are entrusted to handle students' or employees' personal information are responsible for adhering to this policy. Guidance is available as needed from supervisors or from the Compliance office.

Any employee who violates this policy may be subject to disciplinary action, up to and including termination of employment.

Approved

Board of Trustees June 16, 2006