

Volume I1: Information Technology	11.02.4 Identity Protection Effective Date: 04/01/2013 Last Revision: 04/01/2015	Responsible Office: Finance and Administration
Chapter 02: Data Security		Responsible Officer: Vice President for Finance and Administration

POLICY STATEMENT

It is important to safeguard Social Security numbers (SSNs) against unauthorized access and to limit the widespread dissemination of SSNs in order to reduce the potential for identity theft. Northeastern Illinois University (the "University") adopts this Identity Protection Policy pursuant to the Identity Protection Act (5 ILCS 179/1, et seq.).

PURPOSE OF THE POLICY

The purpose of this policy is to comply with State of Illinois and federal regulations related to the collection, use or disclosure of Social Security numbers as defined by the Identity Protection Act (5 ILCS 179/1, et seq.). The Identity Protection Act requires each local and State government agency to draft, approve, and implement an Identity-Protection Policy to ensure the confidentiality and integrity of SSNs the agencies collect, maintain, and use.

WHO IS AFFECTED BY THIS POLICY

All University employees who have access to Social Security numbers.

REGULATIONS

[5 ILCS 179/ Identity Protection Act](#)

[Family Educational Rights and Privacy Act \(FERPA\)](#)
[Fair Credit Reporting Act](#)

[Gramm-Leach-Bliley Act](#)

[Illinois Freedom of Information Act](#)
[Illinois Unemployment Insurance Act](#)

PROCEDURES

Applicability

- 1) Pursuant to the Act, this Policy does not apply to the collection, use, or disclosure of a Social Security number as required by State or federal law, rule or regulation.
- 2) Pursuant to the Act, this Policy does not apply to documents that are recorded with the county recorder or documents that are required to be open to the public.

Embedded Social Security Numbers

Social Security numbers shall not be encoded or embedded in or on a card or document, including, but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology.

Social Security Number Protections Pursuant to Law

Whenever an individual is asked to provide a SSN, the University shall provide that individual with a statement of purpose for which the University is collecting and using the SSN. The University shall also provide the statement of purpose upon request.



The University shall not:

- 1) Publicly post or publicly display in any manner an individual's SSN. "Publicly post" or "publicly display" means to intentionally communicate or otherwise intentionally make available to the general public.
- 2) Print an individual's SSN on any card required for the individual to access products or services provided by the University.
- 3) Require an individual to transmit a SSN over the Internet, unless the connection is secure or the SSN is encrypted.
- 4) Print an individual's SSN on any materials that are mailed to the individual, through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the SSN to be on the document to be mailed. SSN's may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the Unemployment Insurance Act, any material mail in connection with any tax administered by the Department of Revenue, and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the SSN. A SSN that is permissibly mailed will not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope or be visible on (or through) an envelope without the envelope being opened.

In addition, the University shall not¹:

- 1) Collect, use, or disclose a SSN from an individual, unless:
 - i. required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the SSN is otherwise necessary for the performance of the University's duties and responsibilities;
 - ii. the need and purpose for the SSN is documented before collection of the SSN; and
 - iii. the SSN collected is relevant to the documented need and purpose.
- 2) Require an individual to use his or her SSN to access an Internet website.
- 3) Use the SSN for any purpose other than the purpose for which it was collected.

Requirement to Redact Social Security Numbers

The University shall comply with the provisions of Illinois state law with respect to allowing the public inspection and copying of information or documents containing all or any portion of an individual's SSN. The University shall redact SSNs from the information or documents before allowing public inspection or copying of the information or documents.

When collecting SSNs, the University shall request each SSN in a manner that makes the SSN easily redacted if required to be released as part of a public records request. "Redact" means to alter or truncate data so that no more than five sequential digits of a SSN are accessible as part of personal information.

Employee Access to Social Security Numbers

Only employees who are required to use or handle information or documents that contain SSNs will have access. All employees who have access to SSNs shall be trained by the Office of Human Resources to protect the confidentiality of SSNs.

¹These prohibitions do not apply in the following circumstances:

- 1) The disclosure of SSNs to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the governmental entity must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under this Act on a governmental entity to protect an individual's SSN will be achieved.
- 2) The disclosure of SSNs pursuant to a court order, warrant, or subpoena.
- 3) The collection, use, or disclosure of SSNs in order to ensure the safety of: State and local government employees; persons committed to correctional facilities, local jails, and other law-enforcement facilities or retention centers; wards of the State; and all persons working in or visiting a State or local government agency facility.
- 4) The collection, use, or disclosure of SSNs for internal verification or administrative purposes.
- 5) The disclosure of SSNs by a State agency to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.



- 6) The collection or use of SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the Gramm-Leach-Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.

GUIDELINES

State and federal laws and regulations may change at any time. While this document refers the reader to applicable State and federal laws or regulations for the most up-to-date information possible, in order to maintain relevancy, this Identity Protection Policy shall be reviewed annually, beginning one year from the effective date.

APPENDIX

Statement of Purpose for Collection of Social Security Numbers

RELATED POLICIES AND OTHER INFORMATIONAL MATERIAL

[Acceptable Use of Technology
Data Security Breach](#)

[Release of Information Pertaining to Students
Data Standards Document](#)

CONTACT INFORMATION

Please direct questions or concerns about this policy to:

Contact	Phone	E-Mail
Vice President for Finance and Administration	773-442-5100	vpfinance-admin@neiu.edu

DISCLAIMER

The University reserves the right to modify or amend sections of this policy at any time at its sole discretion. This policy remains in effect until such time as the Responsible Officer calls for review. Requests for exception to any portion of this policy, but not to the policy statement, must be presented in writing to the Responsible Officer.



APPENDIX – STATEMENT OF PURPOSE



University Policy

**Northeastern Illinois University
 Statement of Purpose for Collection of Social Security Numbers
 Identity Protection Policy**

The Identity Protection Act, 5 ILCS 179/1 et seq., requires each local and State government agency to draft, approve, and implement an Identity Protection Policy that includes a statement of purpose or purposes for which the agency is collecting and using an individual's Social Security Number (SSN). This statement of purpose is being provided to you because you have been asked by Northeastern Illinois University to provide your SSN or because you requested a copy of this statement.

Why do we collect your Social Security Number?

You are being asked for your SSN for one of the following reasons:

- Student Financial Aid
- Employment matters
- Insurance claim
- Complaint mediation or investigation;
- Vendor services, such as executing contracts and/or billing;
- Law enforcement investigation;
- Child support collection;
- Internal verification;
- Administrative services; and/or
- Other: _____

What do we do with your Social Security Number (SSN)?

We will only use your SSN for the purpose for which it was collected.¹

We will not:

- Sell, lease, loan, trade, or rent your SSN to a third-party for any purpose;
- Publicly post or publicly display your SSN;
- Print your SSN on any card required for you to access our services;
- Require you to transmit your SSN over the Internet, unless the connection is secure or your SSN is encrypted; or
- Print your SSN on any materials that are mailed to you, unless state or federal law requires that number to be on documents mailed to you, or unless we are confirming the accuracy of your SSN.²

¹ Exceptions include but are not limited to: disclosure pursuant to a court order, warrants, or subpoena; disclosure to ensure safety; disclosure for internal verification or administrative purposes; disclosure for collection of delinquent child support or of any state debt or to a governmental agency to assist with an investigation or the prevention of fraud; and disclosure to investigate or prevent fraud, to conduct background checks, to collect debt, to obtain a credit report, as allowable under the federal Gramm-Leach-Bliley Act, to locate missing person, and to file for unclaimed property benefits.

² Exception include, but are not limited to: material mailed in connection with the administration of the Unemployment Insurance Act; material mailed in connection with any tax administered by the Department of Revenue; and documents sent as part of nay application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the SSN.

Questions or Complaints about this Statement of Purpose

Write to:

Northeastern Illinois University
 Vice President for Finance and Administration
 5500 North St. Louis Avenue
 Chicago, IL 60625
 (773) 773-442-5100