

The Right Door for Hope, Recovery and Wellness

Chapter Title Human Resources	Section # HR	Subject # 590	
Subject Title Social Security Number Security	Adopted 12/27/05	Last Revised 6/17/16	Reviewed 12/27/05; 12/17/08; 1/25/10; 4/25/11; 3/26/12; 4/22/13; 7/28/14; 6/22/15 6/27/16; 7/24/17

POLICY

Application

This policy shall apply to all employees of The Right Door for Hope, Recovery and Wellness.

1.0 Purpose

The Right Door for Hope, Recovery and Wellness recognizes that it collects and maintains confidential information relating to its program participants, employees, and individuals associated with our agency and is dedicated to ensuring the privacy and proper handling of this information. The primary purpose of this Social Security Number (SSN) Policy is to ensure that the necessary procedures, safeguards, and privacy training are implemented at this agency in order for The Right Door for Hope, Recovery and Wellness to fully comply with both its own policies, as well as all applicable state and federal confidentiality laws, which may include, but not be limited to, the Family Educational Rights and Privacy Act (FERPA), the Gramm-Leach-Bliley Act (GLBA), the Health Insurance Portability and Accountability Act (HIPAA), and the Michigan Social Security Number Privacy Act (MCL 445.81 et seq).

2.0 Objectives

The Right Door for Hope, Recovery and Wellness is guided by the following objectives:

- 2.1 Broad awareness of the confidential nature of the Social Security number;
- 2.2 Reduced reliance upon the Social Security number for identification purposes;
- 2.3 A consistent policy towards and treatment of Social Security numbers throughout our agency; and
- 2.4 Increased confidence by program participants and employees that Social Security numbers are handled in a confidential manner.

3.0 Guidelines/Policies

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To maintain the privacy of program participants and employees in relation to their SSNs, The Right Door for Hope, Recovery and Wellness will undertake its best efforts to implement the practices outlined in this section of the policy.

3.1 Reducing the collection of SSNs

The Right Door for Hope, Recovery and Wellness will:

- 3.1.1 Collect SSNs only where required or authorized to do so by federal or state law.
- 3.1.2 When collecting SSNs as allowed, but not required by law, do so only as reasonably necessary for the proper administration of the agency programs and activities.
- 3.1.3 If a unique personal identifier is needed that does not require use of an employee's or program participant's SSN, The Right Door for Hope, Recovery and Wellness shall develop its own identifier as a substitute for the SSN.

3.2 Informing individuals when requesting their SSNs

- 3.2.1 Whenever The Right Door for Hope, Recovery and Wellness collects SSNs as required or allowed by law, our agency will inform the individuals of the purpose of the collection, the intended use, whether the law requires the number to be provided or not, and the consequences of not providing the number.
- 3.2.2 The Right Door for Hope, Recovery and Wellness will include these policies concerning SSNs in its written agency policies.

3.3 Eliminating the public display of SSNs

The Right Door for Hope, Recovery and Wellness will seek to maintain the security of SSNs, including:

- 3.3.1 Seek to eliminate public display of SSNs and shall promote a "clean desk/work area" policy requiring employees to properly secure records containing SSNs.
- 3.3.2 SSNs will not be put on documents that are widely seen by others, such as identification cards, badges, time cards, employee rosters, bulletin board postings, and other similar materials.

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- 3.3.3 Documents with SSNs on them will not be sent through the mail, except on applications or forms, or when required by law.
- 3.3.4 When sending applications, forms or other documents required to carry SSNs through the mail, the SSN will not be placed where it will be revealed by an envelope window, and will not be visible on or, without manipulation, from outside of the envelope or packaging. Where possible, any required SSN field on forms and applications will be left blank and the individual will be asked to fill it in before returning the form or application.
- 3.3.5 SSNs will not be sent by email unless the connection is secure or the SSN is encrypted.
- 3.3.6 An individual will not be required to send his or her SSN over the Internet or by email, unless the connection is secure or the SSN is encrypted.
- 3.3.7 Passwords or codes for access to The Right Door for Hope, Recovery and Wellness Internet website, or a computer system or network, will not require individuals to use SSNs, 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.
- 3.4 Controlling access to SSNs

The Right Door for Hope, Recovery and Wellness will:

 - 3.4.1 Limit access to records containing SSNs only to those who need to see the numbers for the performance of their duties.
 - 3.4.2 Use logs or electronic audit trails to monitor employees' access to records with SSNs.
 - 3.4.3 Protect records containing SSNs, including back-ups, during storage by encrypting the numbers in electronic records or storing records in other media in locked cabinets.
 - 3.4.4 Not store records containing SSNs on computers or other electronic devices that are not secured against unauthorized access.

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3.4.5 Avoid sharing SSNs with other agencies or organizations except where required by law.

3.4.6 Promptly notify the individuals potentially affected, if SSNs are disclosed inappropriately and the individuals whose SSNs were disclosed are put at risk of identity theft or other harm.

3.4.7 Require each Department that routinely handles SSNs to develop a written security plan for those departmental record systems that contain SSNs.

3.5 Release of Social Security Numbers to outside Agencies

SSNs will be released by The Right Door for Hope, Recovery and Wellness to entities outside the agency only:

- As required by law;
- As allowed by law; or
- When written permission is granted by the individual.

3.6 Accountability for protecting SSNs

The Right Door for Hope, Recovery and Wellness will:

3.6.1 Provide training and a copy of this policy for employees on their responsibilities in handling SSNs.

3.6.2 Train all new employees, temporary employees, and contract employees as to the agency SSN policies.

3.6.3 Impose discipline on employees for non-compliance with organizational policies and practices for protecting SSNs.

3.6.4 Conduct risk assessments and regular audits of record systems containing SSNs.

3.6.5 The Corporate Compliance Officer will be responsible for ensuring compliance with these policies and procedures for protecting SSNs.

4.0 Employee Disclosure Policies

In order to maintain the security of SSNs, each The Right Door for Hope, Recovery and Wellness employee who has access to this data shall strictly comply with the following requirements.

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- 4.1 Employees shall not disclose another employee's or a program participant's SSN to others unless it is expressly required as part of that employee's job requirements. If an employee questions whether a disclosure of any SSN is required or is authorized, it is the employee's responsibility to obtain clarification as to its appropriateness from their supervisors prior to disclosing the SSN.
- 4.2 Each employee who has access to any SSNs shall keep a "clean desk/work area" so that SSNs shall not be observable to others in the general area, and documents with SSNs shall not be left in an unsecure fashion when the employee leaves the immediate desk or work area.
- 4.3 Employees shall not send SSNs by email or over the Internet unless the connection is secure or the SSN is encrypted. Employees shall be advised by their supervisor or The Right Door for Hope, Recovery and Wellness Information Technology staff of which methods of transmission and sites are secure and/or encrypted and are authorized for use.
- 4.4 Employees shall not leave voice mail messages containing SSNs.
- 4.5 If an employee must send a SSN by fax, special measures to ensure confidentiality shall be taken, including verifying that the receiving fax machine is being attended by a person authorized to receive the fax document.
- 4.6 When possible, employees shall ask individuals (employees, program participants, consumers, etc.) for identifiers other than the SSN when looking up records for the individual.
- 4.7 Employees shall promptly report to their immediate supervisor or to the Corporate Compliance Officer any inappropriate disclosure or loss of records containing SSNs.
- 4.8 When discarding or destroying records in any medium containing SSNs, employees shall do so in a way that is in a secure fashion that protects the records' confidentiality. In the context of the destruction of paper and electronic documents, this refers to a method that defeats both casual and deliberate attempts at theft, such as the shredding of documents containing Social Security numbers and the use of "confidential" recycling bins. For electronic documents this refers to explicit deletion or storage on a device protected by a password based security system.

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- 4.9 Employees may be subject to disciplinary action, up to and including termination of employment or dismissal from The Right Door for Hope, Recovery and Wellness, for violating this policy, such as by breaching the confidentiality of Social Security numbers. Any such disciplinary action shall be governed by the agency policies and procedures applicable to the situation.

5.0 Appropriate SSN Disclosures

The provisions of this Policy are not intended to bar the use or disclosure of SSNs under the following circumstances:

- 5.1 A document or information that includes all or more than 4 sequential digits of the SSN may be mailed to a person by an authorized employee when any of the following apply:
- 5.1.1 State or federal law, rule, regulation, or court order or rule authorizes, permits, or requires that a SSN appear in the document.
 - 5.1.2 The document is sent as part of an application or enrollment process initiated by the individual whose SSN is sent.
 - 5.1.3 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 SSN of an individual who has an account, contract, policy, or employee or health insurance benefit.
 - 5.1.4 The document or information is used or mailed under any of the following circumstances:
 - The document or information is a public record and is mailed in compliance with the Freedom of Information Act, 1976 PA 442, MCL 15.231 to 15.246.
 - The document or information is a copy of a public record filed or recorded with a 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 by law and is mailed to a person entitled to receive that record.

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- 5.1.5 The document or information containing an individual's SSN is mailed by or at the request of that individual or his or her parent or legal guardian.
- 5.1.6 The document or information is mailed in a manner or for a purpose consistent with subtitle A of title V of the Gramm-Leach-Bliley act, 15 USC 6801 to 6809; with the Health Insurance Portability and Accountability Act of 1996, Public Law 104-191; or with Section 537 or 539 of the Insurance Code of 1956, 1956 PA 218, MCL 500.537 and 500.539.
- 5.2 SSNs may be used or disclosed under the following circumstances:
 - 5.2.1 When use of a SSN is authorized or required by state or federal statute, rule, or regulation, by court order or rule, or pursuant to legal discovery or process.
 - 5.2.2 When use of a SSN is by a title IV-D agency, law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution, or providing all or more than 4 sequential digits of a social security number to a title IV-D agency, law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution.
 - 5.2.3 To verify an individual's identity, identify an individual, or do another similar administrative purpose related to an account, transaction, service, or employment; or proposed account, transaction, service, or employment.
 - 5.2.4 To investigate an individual's claim, credit, criminal, or driving history.
 - 5.2.5 To detect, prevent, or deter identity theft or another crime.
 - 5.2.6 To lawfully pursue or enforce a person's legal rights, including, but not limited to, an audit, collection, investigation, or transfer of a tax, employee benefit, debt, claim, receivable, or account or an interest in a receivable or account.
 - 5.2.7 To lawfully investigate, collect, or enforce a child or spousal support obligation or tax liability.

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- 5.2.8 To provide or administer employee or health insurance or membership benefits, claims, or retirement programs or to administer the ownership of other investments.

References

Health Insurance Portability and Accountability Act (HIPAA) of 1996, PL104-191
Family Educational Rights and Privacy Act (FERPA), 200USC, 1232; 34 CFR Part 99
Gramm-Leach-Bliley Act (GLBA) 15 USC 6801-6809
Michigan Social Security Number Privacy Act – MCL 445.81etseq.
Insurance Code of 1956, PA 218, MCL 500.537 and 500.539

Melissa McKinstry, Board Chairperson	Date		