

TEMPLE UNIVERSITY

POLICIES AND PROCEDURES MANUAL

Title:	Social Security Number Usage
Policy Number:	04.75.11
Issuing Authority:	Office of the President
Responsible Officer:	Vice President for Computer and Financial Services, and Chief Information Officer
Date Created:	September 30, 2004
Date Last Amended/Reviewed:	July 15, 2010
Date Scheduled for Review:	July 2014
Reviewing Office:	Office of the Vice President for Computer and Financial Services, and Chief Information Officer

Scope and Applicability

Temple University collects and maintains personal and confidential information, including Social Security numbers, relating to (i) its students and applicants for admission, (ii) employees and applicants for employment, (iii) to some extent, certain other individuals associated with the university. These three groups are referred to collectively, in this policy, as “Temple-Related Individuals”. The university is committed to safeguarding the security and confidentiality of personal and confidential information, and has adopted policies, procedures, and practices to meet compliance with applicable laws, including:

- Family Educational Rights and Privacy Act (“FERPA”, also referred to as the “Buckley Amendment”), 20 U.S.C. §1232g
- Health Insurance Portability and Accountability Act of 1996 (“HIPAA”), and implementing regulations issued by the U.S. Department of Health and Human Services including Standards for Privacy of Individually Identifiable Health Information, 45 CFR Parts 160 and 164 (“Privacy Rule”)
- Gramm-Leach-Bliley Act (“GLBA”) 15 U.S.C §6801 et seq, and implementing regulations issued by the Federal Trade Commission including Standards for Safeguarding Customer Information (the “Safeguards Rule”), 16 CFR Part 314; and The Privacy Act of 1974, 5 U.S.C. § 552a (2000)
- Federal Trade Commission’s Identity Theft Red Flags Rule (“Red Flags Rule”), 16 C.F.R. §§681.1-681.3
- Pennsylvania Breach of Personal Information Notification Act (“PA SB 712”)

This policy does not replace or supersede, but rather is intended to complement (and should be interpreted consistently with) other university policies that deal with privacy and information security.

This policy applies to all Temple-Related Individuals and all Temple University schools, colleges, departments, centers, institutes, administrative units, offices and all other units.

Purpose:

Temple University has implemented this policy to:

- a. Eliminate the Social Security number as the primary identifier at the university.
- b. Ensure that the Social Security number is handled consistently throughout the university.
- c. Increase protection of the personal and confidential information of Temple-Related Individuals.
- d. Provide confidence to Temple-Related Individuals that their Social Security numbers are used properly.
- e. Raise awareness throughout the university regarding the confidential nature of the Social Security number.

Definitions:

“**Certain other individuals associated with the university**” includes alumni, trustees, volunteers, clients, temporary employees of agencies who are assigned to work for Temple University, and third party contractors engaged by Temple University and their agents and employees.

Policy:

The use of the Social Security number as a primary identifier for Temple-Related Individuals shall be avoided, except when required by law or when required by practical necessity as approved by the president or other designated university officers. The vice president for computer and financial services and the chief information officer shall develop and implement procedures for ensuring compliance with this policy (“Social Security Number Usage Procedures” or “SSN Procedures”). SSN Procedures can be found at Social Security Number Usage Procedures, policy number 04.75.12, at <http://policies.temple.edu>.

Enforcement:

Any Temple-Related Individual who violates this policy or fails to comply with applicable SSN procedures is subject to disciplinary action, up to and including dismissal from employment.

Effective Date:

This policy is effective immediately, with Social Security Number Usage Procedures to be fully implemented no later than September 30, 2005.

Notes

1. Dates of official enactment and amendments:

Adopted by the president on September 30, 2004.

Amended by the vice president for computer and financial services and the chief information officer on July 15, 2010 (list of applicable laws and definitions updated)

2. History:

Consistent with the stated purpose above, this policy was adopted to limit the risks associated with the collection and maintenance of, as well as access to, Social Security Numbers under Temple University's care.

3. Cross References:

Social Security Number Usage Procedures, administrative policy #04.75.12

Policy Regarding the Confidentiality of Student Records, policy #03.20.11

Comprehensive Information Security Program, policy #04.72.11

Identity Theft Prevention Program, policy #05.20.01

Temple University Health System Personal Health Information Privacy Practices Notice (<http://www.templehealth.org/privacy-hipaa.html>)