

Delta Township Compiled Policy Manual

Title:	Social Security Number Privacy Policy
Adoption Date:	September 5, 2006
Revision Date:	

General Purpose: This Privacy Policy sets forth Delta Township’s policies and procedures regarding how Social Security numbers are to be obtained, stored, transferred, used, disseminated, disclosed, and disposed.

Summary Statement of Policy: It is the policy of Delta Township to protect the confidentiality of Social Security numbers obtained in the ordinary course of business from employees, vendors, contractors, customers or others. No person shall knowingly obtain, store, transfer, use, disseminate, disclose, or dispose a Social Security number that Delta Township obtains or possesses except in accordance with the Act and this Privacy Policy.

Actual Policy as written:

1. Purpose.

As required by the Michigan Social Security Number Privacy Act, being Public Act 454 of 2004, MCL 445.81 et seq., (hereinafter referred to as “the Act”) the Charter Township of Delta (hereinafter referred to as “Delta Township”) must create a privacy policy concerning the Social Security numbers that Delta Township possesses or obtains.

Pursuant to the Act, the privacy policy must at least:

- a. Ensure to the extent practicable the confidentiality of the Social Security numbers.
- b. Prohibit unlawful disclosure of the Social Security numbers.
- c. Limit access to information or to documents that contain the Social Security numbers.
- d. Describe how to properly dispose of documents that contain the Social Security numbers.
- e. Establish penalties for violation of the privacy policy.

This Privacy Policy sets forth Delta Township’s policies and procedures regarding how Social Security numbers are to be obtained, stored, transferred, used, disseminated, disclosed, and disposed.

2. Policy.

It is the policy of Delta Township to protect the confidentiality of Social Security numbers obtained in the ordinary course of business from employees, vendors, contractors, customers or

others. No person shall knowingly obtain, store, transfer, use, disseminate, disclose, or dispose a Social Security number that Delta Township obtains or possesses except in accordance with the Act and this Privacy Policy.

3. Procedure.

a. Obtaining Social Security Numbers.

Social Security numbers shall be collected only where required by federal and state law, where required by Delta Township Ordinance as permitted by federal and state law, or as otherwise permitted by federal and state law for legitimate reasons consistent with this Privacy Policy.

Legitimate reasons for collecting a Social Security number include, but are not limited to, the following:

1. Applicants for employment with Delta Township, including recreational instructors, recreational officials, scorekeepers, coaches, interns, externs, and contractors, may be required to provide a Social Security number for purposes of a pre-employment background check.
2. Applicants to volunteer with Delta Township, including volunteer youth coaches and volunteer election workers, may be required to provide a Social Security number for purposes of a pre-employment background check.
3. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility to obtain and maintain employment.
4. Social Security numbers may be obtained from employees, including elected and appointed officials, for tax reporting purposes, for new hire reporting or for purposes of enrollment in any Delta Township employee benefit plans, employee retirement benefits, or employee investment programs.
5. Social Security numbers may be obtained from employees, including elected and appointed officials, for payroll records, insurance records, medical records, and other accounting purposes.
6. Social Security numbers may be obtained from employees when necessary for federal, state, or local government sponsored or sanctioned training programs that are verified and monitored by employee Social Security number.
7. Social Security numbers may be obtained by Delta Township for any other administrative purpose related to employment.
8. Social Security numbers may be obtained from creditors or vendors for tax reporting purposes.
9. Social Security numbers may be obtained from persons submitting Homeowner's Principal Residence Affidavits, Request to Rescind Homeowner's Principal Residence Exemption Forms, Personal Property Statements, and other assessing forms and purposes.
10. Social Security numbers may be obtained by Delta Township within various documents recorded with the Eaton County Register of Deeds and forwarded to Delta Township for assessing purposes.

11. Applicants for a permit as required by Delta Township Ordinance may be required to provide a Social Security number for purposes of background checks, to verify an applicant's licensure in a building, electrical, mechanical, or plumbing trade, or for any other purpose related to the activity for which a permit is required.
12. Social Security numbers may be obtained from persons utilizing the services of the Delta Township Fire Department, including but not limited to as a patient, for billing, medical, and identification purposes.

b. Public Display.

All or more than four sequential digits of a Social Security number shall not be placed on any of the following:

1. Employee identification cards, badges, time cards, or rosters.
2. Delta Township bulletin boards.
3. Permits or licenses issued by Delta Township.
4. Materials or documents designed for public display.

Documents, materials or computer screens that display all or more than four sequential digits of a Social Security number shall be kept out of public view at all times.

Delta Township personnel shall ensure that any and all documents, materials or computer screens that display all or more than four sequential digits of a Social Security number but which are required to be viewed by the public shall be properly altered so as to conform with the requirements of this section prior to viewing by the public. Proper alteration shall mean redacting, removing, or otherwise rendering unreadable of a Social Security number.

c. Account Numbers.

All or more than four sequential digits of a Social Security number shall not be used as a primary account number for an individual.

d. Computer Transmission.

All or more than four sequential digits of a Social Security number shall not be used or transmitted on the Internet, by email, or on a computer system or network unless:

1. The electronic transaction or transmission containing a Social Security number is secure using industry standard security protocols.
2. The email or electronic attachment containing a Social Security number is transmitted in an encrypted environment.

e. Mailed Documents.

Documents containing all or more than four sequential digits of a Social Security number shall only be sent by mail where state or federal law, rule, regulation, court order, or court rule

authorizes, permits, or requires that a Social Security number appear in the document. Documents containing all or more than four sequential digits of a Social Security number, that are sent through the mail, shall not reveal the Social Security number through the envelope window or otherwise be visible from outside the envelope or package.

f. Facsimile Transmission.

Documents containing all or more than four sequential digits of a Social Security number shall not be transmitted via facsimile unless such a transmission is required by state or federal law, rule, regulation, or court order, and appropriate safeguards are in place including assurance that the correct fax number is used and that the fax recipient shall not leave the faxed document containing a Social Security number in an unsecured area.

g. Freedom of Information Act.

Where all or more than four sequential digits of a Social Security number are contained within a document subject to release under the Freedom of Information Act (MCL 15.231 et seq.), the Social Security number shall be redacted or otherwise rendered unreadable prior to the document or copy of the document being disclosed.

h. Storage.

All documents or materials containing Social Security numbers shall be stored in a physically secure manner which prevents unauthorized access and ensures confidentiality.

Social Security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.

i. Access to Social Security Numbers.

Only Delta Township personnel who have legitimate business reasons to know will have access to records, documents, or other materials containing Social Security numbers. Delta Township department directors having access to records, documents, or other materials containing Social Security numbers shall determine which other personnel within their respective departments have a legitimate reason in Delta Township's ordinary course of business to have access to such Social Security numbers. All Delta Township personnel, including department directors, using records, documents, or other materials containing Social Security numbers must take appropriate steps to secure such records, documents, or other materials when not in immediate use.

j. Disposal.

Documents and other materials containing Social Security numbers will be retained in accordance with the requirements of state and federal law. At such time as documents and other materials containing Social Security numbers may be disposed of, such disposal shall be accomplished in a manner that protects the confidentiality of the Social Security numbers, including but not limited to shredding.

k. Unauthorized Use or Disclosure of Social Security Numbers.

Delta Township shall take reasonable measures to enforce this Privacy Policy and to correct and prevent the reoccurrence of any known violations.

Any Delta Township employee who knowingly obtains, uses, or discloses Social Security numbers, or who assists another person in doing so, for unlawful purposes or contrary to the requirements of this Privacy Policy shall be subject to disciplinary action, up to and including termination. Additionally, certain violations of the Act carry criminal and/or civil sanctions. Delta Township shall cooperate with appropriate law enforcement and/or administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses, or discloses Social Security numbers through Delta Township for unlawful purposes.

Complaints concerning possible violations of this Privacy Policy shall be directed to the Delta Township Managers Office. If the complaint concerns a staff member of the Delta Township Managers Office, it shall be directed to the Delta Township Supervisor.

l. Severability.

If a court of competent jurisdiction declares any provision of this Privacy Policy to be unenforceable, in whole or in part, such declaration shall only affect the section held to be unenforceable and shall not affect any other part or provision.

m. Repeal of Conflicting Policy Provisions.

All policies or provisions of policies in conflict or inconsistent with the provisions of this Privacy Policy are hereby repealed; provided that any violation charged before the effective date of this policy under a policy provision repealed by this policy shall continue under the policy provision then in effect.

n. Effective Date.

This Privacy Policy shall take effect beginning _____, 2006.