

Social Security Number Privacy Policy

Pursuant to act 454 of the Public Acts of 2004 (MCL 445.81, et seq.), it is the policy of the Romeo District Library to protect the confidentiality of social security numbers.

Accordingly, no person shall knowingly acquire, disclose, transfer, or unlawfully use the social security number of any library employee or other individual unless in accordance with the procedures and rules established by this policy. When used in this policy, the term “employee” includes all full-time, part-time, and temporary personnel.

1. **Public Display Prohibited.** Social security numbers shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, or any other materials or documents designed for public display. Documents, materials, or computer screens that display social security numbers or other sensitive information shall be kept out of public view at all times.

2. **Access to Social Security Numbers.** Only the Administrative Assistant and those authorized by the Library Director shall have access to social security numbers.

3. **Mailed or Transmitted Documents.** Library documents containing social security numbers shall only be sent in cases where state or federal law, rule, regulation, or court order or rule authorizes, permits or requires that a social security number appear in the document. Documents containing social security numbers that are sent through the mail shall not reveal the number through the envelope window or otherwise be visible from outside the envelope or package.

Social security numbers shall not be sent through email unless the connection is secure or the number is encrypted. No individual shall be required to send his or her social security number through email unless the connection is secure or the number is encrypted.

4. **Public Records.** Where a social security number is contained within a document subject to FOIA release, the social security number shall be redacted.

5. **Storage and Disposal.** All documents or files that contain social security numbers shall be stored in a physically secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access. Documents or materials containing social security numbers shall not be thrown away in the trash; they shall be discarded or destroyed only in a manner that protects confidentiality, such as shredding, or by the manner laid out in the Records Retention Guidelines for libraries in Michigan.

6. **Information Collected.** Social security numbers should only be collected where required by federal and state law or as otherwise permitted under the Michigan Social Security Number Privacy Act. If a unique identifier is needed, then a substitute for the social security number shall be used.

Whenever the Library collects a social security number, it shall inform the individual of the purpose for the collection, the intended use, whether the law requires the number to be provided, and the consequence for not providing the number.

7. Accountability. Any person who knowingly and intentionally fails to comply with this policy shall be subject to discipline up to and including discharge.

8. Policy Guidance. If any questions regarding social security number privacy and security should arise, contact the Library Director for policy clarification and guidance.