



3-10-101 Objectives. The University of Northern Colorado recognizes that it collects and maintains confidential information relating to its students, employees, and individuals associated with the University and is dedicated to ensuring the privacy and proper handling of this information.

3-10-101(1) Purpose. The primary purpose of the University of Northern Colorado Student/Employee Identification Number Regulation is to provide the necessary procedures and awareness to ensure that University employees and students comply with both the letter and the spirit of this objective, to the letter and spirit of the Family Educational Rights and Privacy Act (FERPA) of 1974, revised and Colorado Revised Statute 23-5-127 (Identification Numbers for Postsecondary Students).

3-10-101(2) Objectives. The University is guided by the following objectives:

- (a) Reduced reliance upon the Social Security Number (SSN) for identification purposes;
- (b) Increased confidence by students and employees that SSNs are handled in a confidential manner.
- (c) Broad awareness of the confidential nature of the SSN;
- (d) Consistent policy towards and treatment of SSNs throughout the University.

3-10-102 Guidelines/Regulations. The Social Security Number Usage Committee is assigned the responsibility of overseeing the SSN usage at UNC. This committee's approval is required to use the SSN in any printed materials or electronic system. The committee will be composed of the Registrar, Director of Admissions, Director of Human Resources, the Assistant Vice President for Information Technology or designee, and the Director of Institutional Research who will serve as chair of the committee. Specific responsibilities are indicated in the Implementation section

below.

3-10-103 Unique Identifier. The UNC Bear Number is a unique identifier that is used to replace the Social Security Number as the primary identifier in most instances within the University. The Family Educational rights and Privacy Act (FERPA) explicitly includes a student identification number in the list of “personally identifiable information” which would make the student’s identity easily traceable. Therefore, the UNC Bear Number should not be publicly displayed.

3-10-104 UNC Bear Number. The UNC Bear Number will be assigned at the earliest possible point of contact between the individual and the University for all students and employees. It will be permanently and uniquely associated with the individual to whom it is originally assigned.

- (1) All services rendered by UNC and electronic business systems will rely on the identification and authentication services provided by this system.
- (2) The Bear Number will be used in all future electronic and paper data systems to identify, track, and service individuals associated with the University.
- (3) All University forms and documents that collect SSNs will use the language included below and will indicate whether the request is voluntary or mandatory. Forms and documents will be modified on an *as reprinted* basis with full compliance by January 1, 2005.
- (4) Paper and electronic documents containing SSNs and/or the Bear Number will be disposed of in a secure fashion (either shredded or placed in a locked and secure recycle container).
- (5) Non-directory information (as defined by FERPA) will not be publicly posted or displayed in a manner where either the SSN or Bear Number identifies the individual associated with the information.
- (6) Except where the University is legally required to collect and use a SSN, individuals will not be required to provide their SSN, verbally or in writing, at any point of service, nor will they be denied access to those services should they refuse to provide a SSN.

(7) Social Security Numbers will be released by the University to entities outside the University only:

- (a) As allowed by law; or
- (b) When permission is granted by the individual; or
- (c) When the external entity is acting as the University's contractor or agent and adequate security measures are in place to prevent unauthorized dissemination to third parties; or
- (d) When the University's Legal Counsel has approved the release.

(8) The SSN will be used as:

- (a) Allowed by law
- (b) An alternate key to identify individuals whose Bear Number is unknown

(9) The Social Security Number Usage Committee will determine who has a legitimate need to access, collect, and/or store SSNs.

3-10-105 Implementation. The Social Security Number Usage Committee must approve the storage (via any medium) and/or use of a SSN as well as any university form or document that requests a SSN.

3-10-106 Requests. Requests must be submitted on the appropriate form and must provide the following information:

- (1) Name of Unit
- (2) Contact person plus e-mail address and phone
- (3) What is being requested
- (4) Why this is necessary

(5) How it will be used

(6) Who will have access to it

(7) How it will be disposed of

(8) Signature of department head

3-10-107 Denied Requests. Denied requests may be appealed by submitting a written request to meet with the Social Security Number Usage Committee to provide additional documentation and explanation of the necessity to use SSNs.

3-10-108 Approved Forms. All approved University forms and documents that collect SSNs will use the language substantially similar to the language indicated below.

(1) Student: "Use of Social Security Numbers: Providing a Social Security Number is voluntary and is not required for enrollment at UNC. However, the University is required by federal law to report to the Internal Revenue Service (IRS) the name, address and SSN of individuals from whom tuition and expenses are received and to whom compensation is paid. The SSN is required from individuals applying for and receiving financial aid and student employment; utilizing banking services; health services or the student health insurance program. The University will not disclose a SSN for any purpose not required by law without the consent of the student."

(2) Employee: "Use of Employee Social Security Numbers: The University is required by federal law to report income along with Social Security Number (SSN) for all employees to whom compensation is paid. Employee SSNs are maintained and used by the University for payroll, reporting and benefits purposes and are reported to federal and state agencies in formats required by law or for benefits purposes. The University will not disclose an employee's SSN without the consent of the employee to anyone outside the University except as mandated by law or required for benefit purposes."

(3) SSN Statement for Student Handbook and the University's Website: "The

University of Northern Colorado is committed to protecting the privacy of its students, employees and alumni, as well as other individuals associated with it. At times the University will ask you for your Social Security Number (SSN). Federal and state law required the collection of your SSN for certain purposes such as those relating to employment, student loans, and financial aid. Whenever your SSN is requested, the form (both electronic or hardcopy) used to collect your number will be clearly marked as to whether this request is voluntary or mandatory.

“The University is required by the IRS to supply them with the name, address, and Social Security Number of every tuition-paying student. The IRS relies on these lists to certify education related tax credits. The University cannot provide the IRS with this information without a valid SSN.

“The University is required to have a valid SSN before an individual can be entered into any business system involving financial transactions. Thus, without your SSN the University cannot grant an assistantship, waiver, or provide employment.

“Social Security Numbers collected by the University may be used in a variety of ways, such as, but not limited to, the following:

- (a) To identify such student records as applications for admission, transcript and certification requests, medical immunization records, student financial records, financial aid records, health insurance records, and permanent academic records;
- (b) To determine eligibility, certify attendance, and report student status;
- (c) To use as an identifier for grants, loans, and other financial assistance programs; and
- (d) To identify and track employment or medical records.

“The Social Security Number will not be disclosed to individuals or agencies outside the University of Northern Colorado except as allowed by law or with permission from the individual. This statement was created for informational purposes only and may be amended or modified. For a full

description of the University of Northern Colorado's Social Security Number policy, please visit the Board of Trustees website under University Regulations."

3-10-109 Enforcement. An employee or student who has substantially breached the confidentiality of either Social Security Numbers or the Bear Numbers may be subject to disciplinary action or sanctions up to and including discharge, dismissal, or prosecution under federal law as stipulated by FERPA in accordance with University policy and procedures.