

**CITY OF CEDAR SPRINGS
STANDARD OPERATING POLICY**

SUBJECT: Use and Disclosure of Social Security Numbers
Effective Date: July 25, 2005

Policy Number: 9
Amended Date: March 13, 2014

PURPOSE:

The City of Cedar Springs is required by the Michigan Social Security Privacy Act to control how it obtains, uses, disseminates and disposes of records which contain Social Security Numbers. The Privacy Act also requires the City to establish, publish and enforce a policy regarding the use, disclosure and disposal of records which it creates or obtains in the course of its business which contain Social Security Numbers. This Policy sets forth the City's requirements for how such information is gathered, stored, disclosed and ultimately disposed.

POLICY:

It is the policy of the City of Cedar Springs that Social Security Numbers obtained from employees, vendors, contractors, customers or others are confidential information. Such numbers will be obtained, retained, used and disposed of only for legitimate business reasons and in accordance with the law and this Policy.

1. Obtaining Social Security Numbers.

Documents or other records containing Social Security Numbers are to be requested, obtained or created only for legitimate business reasons. Such reasons include, but are not limited to:

- A. Applicants may be required to provide a Social Security Number for purposes of a pre-employment background check.
- B. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment in accordance with the Immigration Reform and Control Act.
- C. Social Security Numbers may be requested from employees for tax reporting purposes (e.g. IRS Form W-4,) for new-hiring reporting, or for purposes of enrollment in the City of Cedar Springs' employee benefit plans.
- D. Social Security Numbers may be obtained from contractors or vendors for tax reporting purposes (e.g. IRS Form 1099.)
- E. Customers/clients may be asked to provide Social Security Numbers for tax reporting purposes of establishing a customer-specific account or other record.

2. Retention and Access to Social Security Numbers.

- A. All records containing Social Security Numbers (whether partial or complete) will be maintained in secured files.
- B. All paper records containing Social Security Numbers must be stamped "Confidential," "Controlled Document," or with some similar identifying mark.
- C. Only personnel who have a legitimate business reason to know will have access to records containing Social Security Numbers.
 - (1) Employees whose jobs entail regular access to records containing Social Security Numbers will be trained in the legal requirements and the requirements of this Policy.
 - (2) Where a record containing a Social Security Number is to be disseminated to persons outside of Cedar Springs, to persons within Cedar Springs who are not authorized or trained in this Policy and Procedure, or where the Number is not relevant to the purpose for which the record is being shared, the Social Security Number should be redacted or otherwise rendered unreadable.
- D. Employees using records containing Social Security Numbers will take appropriate steps to secure such records when not in immediate use. Such steps may include:
 - (1) placing such records in a locked desk or file drawer when not in use.
 - (2) using password protection or screen-savers on computers and computerized records to prevent unauthorized access to or viewing of such records by others.
- E. Inactive records containing Social Security Numbers will be retained in accordance with the requirements of state and federal laws and then destroyed in a manner that continues to ensure their confidentiality. For purposes of the Policy, "inactive records," are those where there is no longer a current employee, supplier or customer relationship.

3. Unauthorized Use/Disclosure of Social Security Numbers.

Any employee who obtains, uses or discloses Social Security Numbers for unauthorized purposes or contrary to the requirements of this Policy shall be subject to discipline up to and including discharge.