

**CALHOUN COUNTY  
BOARD OF COMMISSIONERS  
POLICY STATEMENT**

<b>SUBJECT:</b>  <b>SOCIAL SECURITY NUMBER PRIVACY POLICY</b>	<b>DATE APPROVED:</b>  <b>1/5/06</b>	<b>EFFECTIVE:</b> <b>1/1/06</b>  <b>REPLACES:</b>	<b>POLICY NO.</b> <b>231</b>  <b>NEW</b>
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**I. POLICY**

It is the policy of Calhoun County to ensure to the extent practicable the confidentiality of social security numbers in accordance with the requirements of the Michigan Social Security Number Privacy Act ( hereinafter referred to as the “Act”).

**II. IMPLEMENTATION AND ENFORCEMENT**

The effective date of this Policy is January 1, 2006. The Human Resources Manager has responsibility for the implementation and enforcement of this Policy.

The Act does not apply if the County’s use of a social security number is authorized or required by state or federal statute, rule, or regulation, or by court order or rule, or in litigation. Further, the Act does not apply to use of social security numbers by a title IV-D agency, law enforcement agency, court or prosecutor as part of a criminal investigation or prosecution.

**III. PERMITTED USE OF SOCIAL SECURITY NUMBERS**

It is not a violation of the Act to use all or more than four (4) sequential digits of a social security number if the use is for any of the following:

(a) **Administrative Use in the Ordinary Course of Business.** The County may use social security numbers:

- to verify the individual’s identity, to identify an individual, or for similar administrative purposes related to employment;
- to investigate an individual’s claim, credit, criminal or driving history;
- to detect, prevent, or deter identity theft or other crimes;
- to lawfully pursue or enforce legal rights, such as for audit, collection, investigation or transfer of a tax, employee benefit, claim, debt, receivable or account or an interest in a receivable or account;
- to provide or administer employee benefits or health insurance benefits, claims, or retirement programs or to administer the ownership of shares of stock or other investments;
- to lawfully investigate, collect, or enforce a child or spousal support obligation or tax liability.

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(b) **Primary Account Number.** The County is permitted to use an individual's social security number as the primary account number for identification purposes because it has been continuously doing so since prior to March 1, 2005.

**IV. PROHIBITIONS ON USE AND DISCLOSURE**

The County shall not do any of the following:

(a) **Public Displays.** The County will not publicly or visibly display more than four (4) sequential digits of a social security number on County property or on any County identification badge or similar item.

(b) **Computer Use.** The County will not require employees to use or transmit more than four (4) sequential digits of their social security number over the internet or on a computer system or network unless the connection is secure or the transmission is encrypted. Similarly, the County will not require employees to use or transmit more than four (4) sequential digits of their social security number to gain access to the internet or a computer system unless the connection is secure, the transmission is encrypted, or a password or other unique personal identification or authentication device is also required.

(c) **Mailing of Documents.** Mailing means the use of United States mail or other delivery services that do not require the recipient to sign for the package.

- The County will not include more than four (4) sequential digits of a social security number in or on any document or information mailed or otherwise sent to an individual if it is visible on or without manipulation from the outside of the envelope or packaging.
- The County will not include more than four (4) sequential digits of a social security number in or on any document or information mailed or otherwise sent to an individual unless: (1) the use of social security number is permitted or required under state or federal law, court rule, or court order; or (2) the document is sent as part of an application or enrollment process initiated by the individual; or (3) the document is sent to establish, confirm the status of,

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amend, or terminate an account, contract, policy, employee benefit, or health insurance benefit; or to confirm the accuracy of a social security number of an individual who has an account, contract, policy, employee benefit or health insurance benefit.

- The County will not include more than four (4) sequential digits of a social security number in or on any document or information mailed or otherwise sent to an individual unless the document is mailed under the following circumstances: (1) the document or information is a public record and is provided in compliance with the Freedom of Information Act, MCL 15.231, et seq.; (2) the document or information is a copy of a public record filed or recorded with a county clerk or register of deeds office and is mailed by that office to a person entitled to receive the document; (3) the document or information is a copy of a vital record recorded as provided by law and is mailed to a person entitled to receive the document; (4) the document or information is mailed at the request of an individual whose social security number appears in the document or at the request of the individual's parent or guardian; (5) the document or information is mailed in a manner consistent with specific federal and state regulations identified within the Michigan Social Security Number Privacy Act.

**V. ACCESS TO INFORMATION**

The County limits access to social security numbers to those employees whose job duties require that they use this information in connection with County business. Documents and electronic files containing social security numbers will be maintained in a confidential manner, and will not be disclosed to persons other than those working in departments in which access to the records is necessary for the performance of job duties.

All employees in necessary areas will be provided training on the specific requirements of the Michigan Social Security Number Privacy Act and the provisions of this Policy.

**VI. DISPOSAL OF INFORMATION**

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The County will properly dispose of documents containing social security numbers by ensuring that all such materials are shredded, or erased, or otherwise removed prior to discard. Data stored in electronic format will be rendered irretrievable before computers are discarded or destroyed.

**VII. APPLICATION OF POLICY**

This Policy applies to all County Departments and employees that utilize employee social security numbers, retain copies of social security numbers, or perform any human resource functions necessitating the use, retention or disbursement of employee social security numbers.

**VIII. PENALTIES**

Any employee who has intentionally violated the Michigan Social Security Number Privacy Act or this Policy is subject to disciplinary measures up to and including discharge. A copy of the Act is available upon request.