I. **Purpose:**

Wilkes University 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 confidential information. The primary purpose of this Social Security number policy is to ensure that the necessary procedures and awareness exists to ensure that the University complies with both the letter and spirit of the Family Educational Rights and Privacy Act and the Privacy Act of 1974. The University is guided by the following objectives:

- Broad awareness of the confidential nature of the Social Security number;
- Reduce reliance upon the Social Security number for identification purposes;
- A consistent policy towards and treatment of Social Security numbers throughout the University; and
- Increased confidence by students, employees and individuals associated with the University that Social Security numbers are handled in a confidential manner.

II. **Definitions:**

**FERPA**

**WIN**
Wilkes Identification Number is a permanent and unique identification number associated with the individual to whom it is originally assigned.
III. **Procedure:**

A University wide Identification Number (WIN-Wilkes Identification Number) will be assigned to all students, employees and other individuals associated with the University. This WIN will be assigned at the earliest possible point of contact between the individual and the University. The WIN will be used in all electronic and paper data systems to identify, track and service individuals associated with the University. It will be permanently and uniquely associated with the individual to whom it is originally assigned.

Social Security numbers may be not displayed on materials or documents that would be widely viewed by others, such as identification cards, time cards, employee rosters, student rosters, bulletin board postings, grade postings and other materials.

Social Security numbers will be electronically transmitted only through an encrypted mechanism.

All University forms and documents that collect the Social Security numbers will use language included below and will indicate whether the request is voluntary or mandatory. Forms and documents will be modified with full compliance by December 31, 2005.

Printed reports and other documents should list Social Security numbers; if Social Security numbers need to be included in printed documents, such documents should be accessible only to individuals that require the information for the performance of their duties if those duties include access to Social Security numbers.

Paper documents containing Social Security numbers can only be disposed of by --- shredding the documents to ensure full confidentiality.

Except where the University is legally required to collect a Social Security number, individuals will not be required to provide their Social Security numbers, verbally or in writing, at any point of service, nor will they be denied access to those services should they refuse to provide a Social Security number. However, they may volunteer their Social Security number if they wish as an alternate means of locating a record.
Social Security numbers will be released by the University to entities outside the University only:
- As allowed by law; or
- When permission is granted by the individual; or
- 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
- When approved by Vice President for Finance and Support Operations.

Social Security numbers may continue to be stored as a confidential attribute associated with an individual.

Social Security numbers will only be collected in circumstances where the collection is mandated by a government agency.

All University forms and documents that collect Social Security number will use the language included below. It is understood that this language will be implemented by December 2005. If situations arise in which the following statements are not appropriate, please contact the Vice President for Finance and Support Operations to provide an appropriate alternative statement.

**Student**

**Use of Student Social Security numbers:** Furnishing a Social Security number is voluntary and not required for enrollment. However, Wilkes University is required by federal law to report to the Internal Revenue Service (IRS) the name, address and SSN for persons from whom tuition and related expenses are received. Federal law also requires the University to obtain and report to the IRS the Social Security number for any person to whom compensation is paid. Failure to provide such information may delay and/or prevent your enrollment and/or payment. The University will not disclose a Social Security number for any purpose not required by law without the consent of the student.

**Employee**

**Use of Employee Social Security numbers:** Wilkes University is required by federal law to report income along with Social Security numbers for all employees to whom compensation is paid. Employees Social Security numbers are maintained and used the University for payroll, reporting and benefits purposes and are reported to federal, state and local agencies in formats required by law or for benefits purposes. The University will not disclose an employee’s Social Security number without the consent of the employee to anyone outside the University except as mandated by law or required for benefit purposes.
4. Responsibilities:

Supervisors must limit access to records containing Social Security numbers to only those employees who need to use the numbers for the performance of their duties as University employees.

All persons who have electronic access to Social Security numbers via electronic systems containing Social Security numbers are required to sign a Confidentially Agreement (Attachment A) and have it included in their personnel file in the Office of Human Resource Development.

If a University employee discovers that Social Security numbers have been disclosed inappropriately and the individuals whose Social Security numbers were disclosed are put at risk of identity theft or harm, the employee must immediately notify the Vice President for Finance and Support Operations. Any violations of this policy should be reported to the Vice President for Finance and Support Operations office at 570-408-4500.

The Vice President for Finance and Support Operations Office is to assure that this policy is reviewed and updated.
Routing and Communication Process

<table>
<thead>
<tr>
<th>Committee</th>
<th>Date</th>
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<tbody>
<tr>
<td>Information Technology Advisory Committee</td>
<td>12/2005</td>
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<tr>
<td>Instructional Technology Committee</td>
<td>11/2005</td>
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<tr>
<td>Administrative Process Committee</td>
<td>11/2005</td>
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<tr>
<td>President’s Cabinet</td>
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Communication of policy:

- IT Webstie
- Updated student technology guide
- Faculty and staff technology guide
- Wilkes Today