

Category: 100
Number: 139

Subject: **SOCIAL SECURITY NUMBER PRIVACY POLICY**

1. **PURPOSE:** It may be necessary for the County of Saginaw to obtain social security numbers in the ordinary course of business and in accordance with the law. Based upon this, and pursuant to the Michigan Social Security Number Privacy Act, being MCL 445.81, et seq., it is the policy of the County of Saginaw to protect the confidentiality of social security numbers to the fullest extent practicable. No person shall knowingly acquire, disclose, transfer, or use the social security number of any employee or other individual unless in accordance with the procedures and rules established by this policy and pursuant to Federal and State law.
2. **AUTHORITY:** Saginaw County Board of Commissioners
3. **APPLICATION:** This policy applies to all County employees, pursuant to Policy #301.
4. **RESPONSIBILITY:** The Controller/CAO of Saginaw County shall be responsible for the implementation of this policy. It shall be the responsibility of Department Heads, and Agencies of Saginaw County to administer this policy.
5. **DEFINITIONS:** NONE
6. **POLICY:**
 - 6.1 **Public Display.** 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.
 - 6.2 **Access to Social Security Numbers.** Only persons authorized by the department head shall have access to social security numbers.
 - 6.3 **Mailed or Transmitted Documents.** County 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 social security numbers 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 of the envelope or package. Social security numbers shall not be sent through email unless the connection is secure or the number is encrypted. No person shall be required to send his or her social security number through email unless the connection is secure or the number is encrypted.

- 6.4 Public Records. Where a social security number is contained within a document subject to release under the Freedom of Information Act, the social security number shall be redacted.
- 6.5 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 other 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 their confidentiality, such as shredding.
- 6.6 Information Collected. Social security numbers should only be collected where required by federal or state law or otherwise permitted under the Michigan Social Security Number Privacy Act.
- 6.7 Accountability. Any person who fails to comply with this policy shall be subject to discipline, up to and including discharge.
- 6.8 Accordance with the law. This policy shall be interpreted, and construed in accordance, with the Michigan Social Security Number Privacy Act.

7. ADMINISTRATIVE PROCEDURES: NONE

8. CONTROLLER/CAO LEGAL COUNSEL REVIEW: The Controller/CAO has determined that this policy as submitted to the Board of Commissioners contains the necessary substance in order to carry out the purpose of the policy. County Civil Counsel has determined that this policy as submitted contains content that appears to be legal activities of the Saginaw County Board of Commissioners.

Approved as to Substance:
Saginaw County Controller/CAO

Approved as to Legal Content:
Saginaw County Civil Counsel

ADOPTED: October 25, 2005