

SIU School of Medicine

Identity Protection Act and
Associated SIU Policy

Authority:

Pursuant to Illinois's *Identity Protection Act* (5 ICLS 179/1)

Requires each local or State agency to draft, approve and implement an Identity-Protection Policy to ensure the confidentiality and integrity of Social Security Numbers (SSN) that the agency collects, maintains and uses. The SIU Board of Trustees approved the required SIU system policy at their May 2011 meeting. The various SIU campuses are required to implement the policy no later than May 2012.

SOM Action Plan:

- Identify departments and units where SSNs are Requested, Received, Used or Disclosed. (school-wide survey conducted)
- Determine appropriateness and authority to obtain and use SSNs. (surveys reviewed)
- Conduct education sessions for those employees who have access to SSNs on the regulatory restrictions and prohibitions of the Act and associated SIU policy.

General:

- The SOM is only authorized to obtain, use, and retain SSNs as authorized by state or federal law, rule, regulation and otherwise necessary for the University to conduct its affairs.
- Utilizing SSNs for purposes not authorized or not disclosed to the person whose SSN is being utilized is prohibited.
- Access to SSNs will be limited to only those SOM employees who have a need for the information.
- The SOM is responsible to provide an appropriate level of security for SSNs which are obtained, disclosed, retained and eventually destroyed.
- For those employees who are required to have access to SSNs, these employees are to be trained in the proper procedures for handling such information from the time of collection through destruction.

Requesting or Receiving SSNs:

- The SOM must inform the individual whose SSN is being requested as to the purpose(s) of obtaining the information.
- Paper, electronic, or a written disclosure statement added to a business form are acceptable.
- Units may use the standard Statement of Purpose (see SIU Policy) or modify to meet their specific needs.
- Not required to list specific uses or recipients, a general statement of purpose is sufficient.
- The SOM shall not request nor transmit a SSN over the internet unless the SSN is encrypted. E-mail accounts w/passwords are not considered secure connections.
- Disclosure of SSNs among internal SOM users is permissible, so long as the SSN owner has been provided with a disclosure and data security measures have been taken.

Using or Disclosing SSNs:

- May not utilize or disclose a SSN unless authorized by law or regulation, or necessary for the performance of an authorized SOM function.
- May only use a SSN if the purpose has been disclosed to the individual.
- Do not display a SSN on materials mailed, by any delivery means, unless state or federal laws allow it, it is part of an application for enrollment, in connection with any tax administered by the IRS or IL. Department of Revenue, or to confirm the accuracy of the SSN.
- SSNs may never be included in an email unless encrypted.
- Unless otherwise authorized by law, an individual's SSN must be redacted (blackened out) before releasing the document for public inspection or copying the document.
- For security reasons and whenever practical, the SSN should be completely redacted, but if not possible than limited to four or five sequential characters. i.e. XXX-X1-2345

Destruction of SSNs:

As soon as allowable under state and/or federal law or University policy, a document in either electronic or paper format containing a SSN where the need for the information is no longer relevant, should be securely destroyed as per SOM policy.

Summary:

If this were your SSN, how would you want your information handled?

What does Southern Illinois University do with your Social Security Number?

Statement of Purpose for Collection of Social Security Numbers

Identity-Protection Policy

The Identity Protection Act, 5 ILCS 179/1 *et seq.*, requires each local and State government agency to draft, approve, and implement an Identity-Protection Policy that includes a statement of the purpose or purposes for which the agency is collecting and using an individual's Social Security number (SSN). This statement of purpose is being provided to you because you have been asked by Southern Illinois University to provide your SSN or because you requested a copy of this statement.

Why do we collect your Social Security number?

You are being asked for your SSN for one or more of the following reasons:

- Student Financial Aid
- Employment matters
- Insurance Claim
- Complaint mediation or investigation;
- Vendor services, such as executing contracts and/or billing;
- Law enforcement investigation;
- Child support collection;
- Internal verification;
- Administrative services; and/or
- Other: _____

What do we do with your Social Security number?

- We will only use your SSN for the purpose for which it was collected.¹
- We will not:
 - Sell, lease, loan, trade, or rent your SSN to a third party for any purpose;
 - Publicly post or publicly display your SSN;
 - Print your SSN on any card required for you to access our services;
 - Require you to transmit your SSN over the Internet, unless the connection is secure or your SSN is encrypted; or
 - Print your SSN on any materials that are mailed to you, unless state or federal law requires that number to be on documents mailed to you, or unless we are confirming the accuracy of your SSN.²

¹ Exceptions include, but are not limited to: disclosure pursuant to a court order, warrants, or subpoena; disclosure to ensure safety; disclosure for internal verification or administrative purposes; disclosure for collection of delinquent child support or of any state debt or to a governmental agency to assist with an investigation or the prevention of fraud; and disclosure to investigate or prevent fraud, to conduct background checks, to collect debt, to obtain a credit report, as allowable under the federal Gramm Leach Bliley Act, to locate missing persons, and to file for unclaimed property benefits.

² Exceptions include, but are not limited to: material mailed in connection with the administration of the Unemployment Insurance Act; material mailed in connection with any tax administered by the Department of Revenue; and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the SSN.

Questions or Complaints about this Statement of Purpose

Write to Southern Illinois University:

Carbondale Campus

Southern Illinois University
Vice Chancellor for Administration and Finance
Anthony Hall, Mail Code 4315
Carbondale, IL 62901
(618) 453-2474

Edwardsville Campus

Southern Illinois University Edwardsville
Director of Human Resources
P.O. Box 1040
Edwardsville, IL 62026
(618) 650-2190

Springfield Campus

SIU School of Medicine & SIU HealthCare
Office of Regulatory Compliance
P.O. Box 19683
Springfield, IL 62794-9683
(217) 545-2110