

APPENDIX 1

Information Security Policy

Approved Uses of SSNs and Other Personally Identifiable Information

The primary uses and reasons for collecting SSNs and other personally identifiable information include, but are not limited to, the following:

- **Enrollment:** Those wishing to enroll in academic offerings at Middle Tennessee State University (MTSU) - both credit and non-credit - are required to provide a social security number (SSN) for secondary identification purposes. IRS regulations do require the University to request a SSN as a Taxpayer ID number for use in tax reporting. In addition, any student applying for financial aid must provide a SSN to the University.

If a person enrolling in a University academic offering - credit or non-credit - refuses to provide a SSN, certain services, such as transcripts, enrollment verification, tax reporting, financial aid and other services may not be available to the individual, and MTSU cannot guarantee a complete academic record for the individual.

Historic records may contain a student's SSN, as SSN was previously used as the primary identifier.

- **Employment:** A SSN must be provided on I-9's in accordance with the Immigration Reform and Control Act of 1986 (IRCA), as overseen by the Human Resource Services .
- Any person employed by the University must provide a SSN as the taxpayer ID number as directed by the IRS. This includes all employees, including part-time and student employees. Providing the SSN is a condition of employment. Applicants for employment must also provide a SSN, if requested, for mandatory background checks.
- **Employee Benefits:** If required by a benefits provider, the SSNs of dependents/beneficiaries may be collected to receive service. The University may also release an employee's SSN to benefit providers.
- **Payment for Personal or Professional Services:** Any person providing services to the University as a independent contractor, invited speaker (honorarium) or research subject for which payment will be made, must provide a SSN as the taxpayer ID number per IRS regulations. These taxpayer ID numbers will be stored in the accounting system as part of the vendor record.
- **Planned Giving Donors:** Donors participating in planned giving programs must provide a SSN as the taxpayer ID per IRS regulations.

- **Insurance Providers:** The SSNs of faculty, staff and students continue to be the patient identifier for many health care providers. For example, to enable payment of medical bills, student SSNs are shared with the insurance company providing health coverage.
- **Third Party Sponsors:** Various third-party sponsors of student aid, including several state agencies, require the submission of SSNs for those students in which aid is being provided. In order for the sponsor to make payment to the university, a SSN must be provided for proper verification.
- **Credit Card Information:** Under current Payment Card Industry (PCI) standards, merchants are allowed to maintain customer credit card numbers for a period of time after the transaction has occurred. The allowable time is set in the PCI standards and subject to change periodically.
- **Advancement Services:** SSN is required for certain tax documents. For example, form 8282-Donee Information Return, requires a donor's SSN for gifts of tangible property valued over \$5,000 and sold within two years of the receipt of the gift. Also, donors who make gifts of life insurance may be required to provide a SSN as dictated by the particular insurance company. Historical documents and related databases may contain SSNs since they were previously used as primary identifiers.
- **Student Health Services:** SSN may be employed as patient identifier for referrals and consultation with outside medical providers and for communication with insurance companies.
- **University Police:** Department personnel collect SSN data during an arrest as required by the Tennessee Bureau of Investigation (TBI) and Federal Bureau of Investigation (FBI). Additionally, UP maintains copies of fingerprint cards that contain SSN data, and the "arrest" module of the records database stores SSN data.