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**Lansing Housing Commission
2009-11
Employee Social Security Confidentiality Policy**

General Policy

LHC, as it relates to the social security numbers of its employees, shall:

- Maintain the confidentiality of the social security numbers that it receives and maintains in the ordinary course of business.
- Limit the internal use to those functions where the use of the social security number is the only reliable method available to ensure the correct employee has been identified.
- Limit access, whether in hard copy or electronic format, to those persons within LHC who have a need to access that information.
- Properly dispose of documents that contain social security numbers to ensure their confidentiality.
- Prohibit the unlawful disclosure of social security numbers by its employees.

A. Definitions

The following words and/or phrases shall have the following meaning for purposes of this policy only:

- "Mailed" means delivered by United States mail or other delivery service that does not require the signature of recipient indicating actual receipt.
- "Publicly Display" means to exhibit, hold up, post, or make visible or set out for open view, including, but not limited to, open view on a desk, computer device, computer network, website, or other electronic medium or device, to members of the public or in a public manner.
- "Title IV-D Agency" means the agency in Michigan performing child support and parenting time enforcement functions including an office of the friend of the court or a prosecuting attorney and it includes a person performing those functions under contract with the Title IV-D agency.

B. Prohibited Activities

Neither LHC, nor an employee on behalf of LHC, shall intentionally do any of the following with the social security number of a LHC employee:

- Publicly Display all or more than four (4) sequential digits of the social security number.
- Visibly print all or more than four (4) sequential digits of the social security number on any identification badge, card or membership card.
- Require an employee to use or transmit all or more than four (4) sequential digits of his or her social security number over the Internet, Intranet or a computer system or network unless the connection is secure or the transmission is encrypted.
- Require an employee to use or transmit all or more than four (4) sequential digits of his or her social security number to gain access to an Internet or Intranet website or a computer system or network unless the connection is secure, the transmission is encrypted, or a password or other unique personal identification number or other authentication device is also required to gain access to the Internet, Intranet or computer system or network.
- Include all or more than four (4) sequential digits of the social security number in or on any document or information Mailed or otherwise sent to an employee if it is visible on or, without manipulation, from outside of the envelope or packaging.
- Include all or more than four (4) sequential digits of the social security number in any document or information Mailed to a person, unless any of the following apply:
 - State or federal law, rule, regulation, or court order or rule authorizes,
 - Permits, or requires that a social security number appear in the document.
 - The document is sent as part of an application or enrollment process initiated by the employee.
 - The document is sent to establish, confirm the status, service, amend, or terminate an account, contract, lease, policy, employee, or health insurance benefit.
 - The document or information is Mailed by or at the request of an employee whose social security number appears in the document or information.
 - The document or information is Mailed in a manner or for a purpose consistent with the Health Insurance Portability and Accountability Act (HIPAA) or other applicable law or regulation.

C. Allowed Activities

Use of all or more than four (4) sequential digits of an employee social security number is permissible under the following circumstances:

- A use of all or more than four (4) sequential digits of a social security number that is authorized or required by state or federal statute, rule, or

regulation, by court order or rule, or pursuant to legal discovery or process.

- Providing all or more than four (4) sequential digits of a social security number to a Title IV-D Agency, law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution.
- An administrative use in the ordinary course of LHC business, to do any of the following:
 - Verify an employee identity or for similar administrative purposes related to an account, transaction, service, or employment or related to a proposed account, transaction, service, or employment.
 - Investigate an employee claim, credit, or criminal history or driving history.
 - Detect, prevent, or deter identity theft or another crime.
 - Lawfully pursue or enforce LHC's legal rights, including, but not limited to, an audit, collection, investigation, or transfer of an employee benefit, debt, claim, receivable, or account or an interest in a receivable or account.
 - Provide or administer employee or health insurance benefits, claims, or retirement programs.
- Use of all or more than four (4) digits of a social security number as a primary account number provided LHC began the use before March 1, 2005, and the use is ongoing, continuous and in the ordinary course of business.

C. Disposition of Documentation Containing Social Security Numbers

All documents and/or electronic media containing employee social security number shall be disposed of only by shredding or burning as appropriate for the nature of the media. No documents and/or electronic media containing social security numbers shall be disposed of in any other manner

D. Penalties for Violation of Policy

Employees who violate this policy may be subject to Disciplinary Action up to and including termination.