

Policy 8.13

POLICY TITLE:	Staff Social Security Numbers	POLICY # 8.13	
Topic Area:	HUMAN RESOURCES	Page 1 of 3	REVIEW DATES
Applies to:	Lakeshore Regional Entity (LRE)	ISSUED BY: Chief Executive Officer	3/20/14 1/7/19
Developed and Maintained by:	LRE CEO & Human Resources Coordinator	APPROVED BY: Board of Directors	5/1/15
			8/20/15
			1/23/17
			1/22/18
Supersedes:	N/A	Effective Date: 4/1/2014	Revised Date: 2/21/17

I. POLICY

It is the policy of Lakeshore Regional Entity that Social Security Numbers obtained from employees, vendors, and contractors are confidential information. Such numbers will be obtained, retained, used, and disposed of only for legitimate business reasons and in accordance with the law and this Policy and Procedure.

II. PURPOSE

Lakeshore Regional Entity is required by the Michigan Social Security Privacy Act to control how it obtains, uses, disseminates, and disposes of employee and contractor records, which contain Social Security numbers. This Policy and Procedure sets forth the Agency's requirements for how such information is gathered, stored, disclosed, and ultimately disposed of.

III. APPLICABILITY AND RESPONSIBILITY

All employees and if applicable volunteers, interns and students.

IV. MONITORING AND REVIEW

The LRE shall review at least annually, and as necessary, to maintain an adequate and acceptable standard of compliance and oversight as a Prepaid Inpatient Health Plan.

V. DEFINITIONS

Staff Member: Refers to employees, interns, students, Board members, and volunteers of LRE.

Contractors: Those individuals engaged on a contract basis, rather than through regular employment status, to perform work on behalf of LRE. Contractors receive Form 1099s at the end of the calendar year rather than Form W-2s.

Vendors: Those individuals or companies that sell products or services to LRE.

VI. PROCEDURES

1. Obtaining Social Security Numbers - Documents or other records containing Social Security Numbers are to be requested, obtained, or created only for legitimate business reasons. Such reasons include, but are not limited to:
 - 1.1 Applicants may be required to provide a Social Security Number for purposes of a pre-employment background check.
 - 1.2 Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment in accordance with the Immigration Reform and Control Act.
 - 1.3 Social Security Numbers may be requested from employees for tax reporting purposes (e.g., IRS Form W-4), and for new-hire reporting, or for purposes of enrollment in LRE employee benefit plans.
 - 1.4 Social Security Numbers may be obtained from contractors or vendors for tax-reporting purposes (e.g., IRS Form 1099).
2. Retention & Access to Social Security Numbers
 - 2.1 All records containing Social Security Numbers (whether partial or complete) will be maintained in secured files.
 - 2.2 All paper records (other than those locked in Personnel Files) containing Social Security Numbers must be stamped "Confidential", "Controlled Document", or with some similar identifying mark.
 - 2.3 Only personnel who have a legitimate business reason to know will have access to records containing Social Security Numbers.
 - 2.3.1 Employees whose jobs entail regular access to records containing Social Security Numbers will be trained in the legal requirements and the requirements of this Policy and Procedure.
 - 2.3.2 Where a record containing a Social Security Number is to be disseminated to persons outside of LRE, to persons within the LRE who are not authorized or trained in this Policy and Procedure, or where the Number is not relevant to the purpose for which the record is being shared, the Social Security Number should be rendered unreadable.
 - 2.4 Employees using records containing Social Security Numbers will take appropriate steps to secure such records when not in immediate use. Such steps may include:

- 2.4.1 Placing such records in a locked desk or file drawers when not in use.
- 2.4.2 Using password protection or screen-savers on computers and computerized records to prevent unauthorized access to or viewing of such records by others.

2.5 Inactive records containing Social Security Numbers will be retained in accordance with the requirements of state and federal laws and then destroyed in a manner that continues to ensure their confidentiality. For purposes of this Policy and Procedure, “inactive records” are those where there is no longer a current employment, contractor, or supplier relationship.

3. Unauthorized Use / Disclosure of Social Security Numbers: Any employee who obtains, uses, or discloses Social Security Numbers for unauthorized purposes or contrary to the requirements of this Policy and Procedure shall be subject to discipline up to and including discharge. LRE will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of individuals who obtain, use, or disclose Social Security Numbers for unlawful reasons.

VII. SUPPORTING DOCUMENTS:

None

VIII. RELATED POLICIES AND PROCEDURES

None