



Kalamazoo Public Library

Operational Policy: Social Security Number Privacy

Kalamazoo Public Library will take all necessary steps to ensure compliance with the provisions of the [“Michigan Social Security Number Privacy Act.”](#) This policy shall be effective January 1, 2006.

Kalamazoo Public Library collects and maintains Social Security Numbers and/or other confidential information relating to its employees and patrons and is committed to maintaining the confidentiality and proper handling of this information as a matter of course and in compliance with the Michigan Social Security Number Privacy Act.

Library Patrons

Social security numbers shall not be requested from, maintained, or used in any way with regard to library patrons.

Employees

Kalamazoo Public Library (“the Library”) may use Social Security Numbers:

- as authorized by state or federal statute, rule, or regulation, or by court order or rule, or in litigation;
- to provide to a title IV-D agency, law enforcement agency, court, or prosecutor as part of a criminal investigation or prosecution;
- to use administratively in the ordinary course of business to: (1) verify the individual’s identity, to identify an individual, or for similar administration purposes related to employment, (2) lawfully investigate an individual’s claim, credit, criminal, or driving history; (3) prevent, detect, or deter identity theft or other crimes; (4) lawfully pursue or enforce legal rights, such as for audit, collection,

investigation or transfer of an employee benefit, or a claim, debt, receivable, or account; (5) lawfully investigate, collect, or enforce a child or spousal support obligation or tax liability; or (6) provide or administer employee or health insurance or membership benefits, claims, or retirement programs or to administer the ownership of shares of stock or other investments.

Restrictions on Use and Disclosure

The Library will comply with the following restrictions on the uses and disclosures of Social Security Numbers

(a) Public Displays. The Library will not publicly or visibly display more than 4 sequential digits of a Social Security Number on Library property or on any Library identification badge or similar item.

(b) Computer Use. The Library will not require employees to use or transmit more than 4 sequential digits of their Social Security Numbers over the Internet or on a computer system or network unless the connection is secure or the transmission is encrypted. Similarly, the Library will not require employees to use or transmit more than 4 sequential digits of their Social Security Numbers to gain access to the internet or a computer system unless the connection is secure, the transmission is encrypted, or a password or other unique personal identification or authentication device is also required

(c) Mailing of Documents. Mailing means the use of U.S. mail or other delivery services that do not require the recipient to sign for the package.

- The Library will not include more than 4 sequential digits of Social Security Numbers on the outsides of envelopes or packages, and will not mail documents or information containing more than 4 sequential digits of Social Security Numbers if those numbers are visible without manipulation from the outside of the envelope or package.
- The Library will not include more than 4 sequential digits of Social Security Numbers in documents or information mailed to individuals for purposes other than those set forth in Section III (c) of the Michigan Social Security Number Privacy Act unless: (1) the use of Social Security Numbers is permitted or required under state or

federal law; (2) the document is sent as part of an application or enrollment process initiated by the individual; (3) the document is sent to confirm the accuracy of an individual's Social Security Number for an account, contract, policy or insurance benefit, or to establish, service, amend, confirm the status of, or terminate the account, contract, policy or benefit; (4) the document or information is mailed by or at the request of an individual whose Social Security Number appears in the document or that individual's parent or legal guardian; or (5) the document or information is mailed in a manner consistent with specific federal regulations.

(d) Access to Information and Training. The Library limits access to Social Security Numbers to those employees whose job duties require that they use this information in connection with Library business. The employees who have access to Social Security Numbers are those who work in the following areas:

- Human Resources
- Benefits Administration
- Computer and Information Technology
- Executive Management

Documents and electronic files containing Social Security Numbers will be maintained in confidential manner and will not be disclosed to persons other than those working in the specified areas.

All employees in the designated areas will be provided training on the specific requirements of the Michigan Social Security Number Privacy Act and the provisions of this Policy.

(e) Disposal of Documents and Data. The Library will properly dispose of documents containing Social Security Numbers by ensuring that all such materials are shredded prior to discard. Data stored in electronic format will be rendered irretrievable before computers are discarded or destroyed.

Penalties

Any employee who has intentionally violated the Social Security Number Privacy Act or this Policy is subject to disciplinary measures up to an including discharge.

Adopted: December 12, 2005.

Effective: December 12, 2005.