

Social Security Number (SSN) Privacy Policy

PURPOSE

Grand Traverse County is committed to maintaining the confidentiality of Social Security numbers that it collects during the regular course of business. As required by the Michigan Social Security Number Privacy Act, being Public Act 454 of 2004, MCL 445.81 et seq., (hereinafter referred to as "the Act") Grand Traverse County must create a privacy policy concerning the Social Security numbers that Grand Traverse County possesses or obtains.

Pursuant to the Act, the privacy policy must at least:

- a. Ensure to the extent practicable the confidentiality of the Social Security numbers.
- b. Prohibit unlawful disclosure of the Social Security numbers.
- c. Limit access to information or to documents that contain the Social Security numbers.
- d. Describe how to properly dispose of documents that contain the Social Security numbers.
- e. Establish penalties for violation of the privacy policy.

Accordingly, Grand Traverse County has established this policy to restrict access, disclosure, use and disposal of Social Security numbers that have been collected by Grand Traverse County.

POLICY & PROCEDURE

It is the policy of Grand Traverse County to protect the confidentiality of Social Security numbers obtained in the ordinary course of business from employees, vendors, contractors, customers or others. No person shall knowingly obtain, store, transfer, use, disseminate, disclose, or dispose a Social Security number that Grand Traverse County obtains or possesses except in accordance with the Act and this Privacy Policy.

Obtaining Social Security Numbers

Social Security numbers (SSN) shall be collected only where required by federal and state law, where required by Grand Traverse County Ordinance as permitted by federal and state law, or as otherwise permitted by federal and state law for legitimate reasons consistent with this Privacy Policy.

All employees are required to have a SSN in order to be employed by Grand Traverse County, so that the County can make adequate tax reporting. The County takes each employee's privacy very seriously, and it maintains a strict policy to protect the confidentiality of SSNs that are obtained by or provided to the County and/or its employees, contractors, agents and representatives in the course of their employment, activities, or services performed on behalf of the County. Documents containing SSNs shall be kept in confidential files.

Legitimate reasons for collecting a Social Security number include, but are not limited to, the following:

1. Applicants for employment with Grand Traverse County may be required to provide a Social Security number for purposes of a pre-employment background check.
2. Copies of Social Security cards may be obtained for purposes of verifying employee eligibility to obtain and maintain employment.
3. Social Security numbers may be obtained from employees, including elected and appointed officials, for tax reporting purposes, for new hire reporting or for purposes of enrollment in any Grand Traverse County employee benefit plans, employee retirement benefits, or employee investment programs.
4. Social Security numbers may be obtained from employees, including elected and appointed officials, for payroll records, insurance records, medical records, and other accounting purposes.
5. Social Security numbers may be obtained from employees when necessary for federal, state, or local government sponsored or sanctioned training programs that are verified and monitored by employee Social Security number.
6. Social Security numbers may be obtained by Grand Traverse County for any other administrative purpose related to employment.
7. Social Security numbers may be obtained from creditors or vendors for tax reporting purposes.
8. Social Security numbers may be obtained by Grand Traverse County within various documents recorded with the County Register of Deeds and forwarded to Grand Traverse County for assessing purposes.
9. Applicants for a permit as required by Grand Traverse County Ordinance may be required to provide a Social Security number for purposes of background checks, to verify an applicant's licensure in a building, electrical, mechanical, or plumbing trade, or for any other purpose related to the activity for which a permit is required.

Freedom of Information Act

The Freedom of Information Act (FOIA), as amended at 5 U.S.C.552, is a disclosure statute that requires Federal Executive Branch agencies to make records available to the public. The intent of the FOIA is to prevent agencies from having "secret law" and to make the government accountable to the public for its actions. FOIA requires agencies to publish in the Federal Register statements of its organizations, functions, rules, procedures, general policy, and any changes, and how to get information. In addition, agencies must index and make available for public inspection and copying statements of policy, manuals and instructions, and final opinions and orders in cases, as well as the indexes.

Where all or more than four sequential digits of a Social Security number are contained within a document subject to release under the Freedom of Information Act (MCL 15.231 et seq.), the Social Security number shall be redacted or otherwise rendered unreadable prior to the document or copy of the document being disclosed.

Business Purposes

Except as required by necessary and legitimate business purposes, no employee is permitted to have access to SSNs (including documents that contain any SSNs) or to keep, view, use, copy, disclose, or distribute another person's SSN, or in any other way disclose another's SSN. One who accesses a SSN for necessary and legitimate business purposes is prohibited from using or accessing the SSN in a manner that may permit an unauthorized individual to view, use, or access the number.

When documents containing SSNs are no longer needed and are to be discarded, such documents must be disposed of in a manner that ensures the confidentiality of the SSNs. The County has developed a practice for shredding, electronically deleting, or otherwise disposing of confidential records, including documents containing SSNs.

Violation of this policy is subject to disciplinary action, up to and including discharge.

Note: This policy may differ for those employees who are members of recognized unions, organizations, or associations. Any questions related to the content of this policy, or its interpretation, should be directed to Human Resources.

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